

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



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**Summary**

Environmental Services, Inc., (ESI) was contracted by the Wildlife Conservation Society (WCS), on 20 February 2018 to conduct the second monitoring period verification under VCS/CCB for the period 01 January 2016 – 31 December 2017 - 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 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-c-s.org/program-documents>. Unless otherwise indicated, the assessment was performed against the most recent version of the relevant VCS guidance document as of October 2018.

A summary of all VCS findings (44 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, ESI confirms that the monitoring conducted by the project proponent, along with the supporting Monitoring Report, are accurate and consistent with all aforementioned VCS Version 3 and CCB Third Edition criteria, the validated PD, and the selected methodology (VM0015). ESI confirms that *Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary* Project Monitoring Report (v3.4 dated 19 November 2018) has been implemented in accordance with the validated PD.

ESI confirms all verification activities, including objectives, scope and criteria, level of assurance, validated Project Description implementation, and project monitoring report adherence to VCS Version

3 (and all associated updates), and CCB Project Design Standards (Third Edition), as documented in this report are complete. ESI concludes without any qualifications or limiting conditions that *Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary* Project Monitoring Report (v3.4 dated 19 November 2018) meets the requirements of VCS Version 3 (and all associated updates) and CCB Project Design Standards (Third Edition) for the verification period/reporting period (01 January 2016 – 31 December 2017 - 2-years). In addition, ESI 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 ESI has resulted in the GHG emissions reduction or removal of 4,523,996 tCO<sub>2</sub> 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% (452,398 tCO<sub>2</sub> equivalents) buffer withholding based on the non-permanence risk assessment tool. This results in 4,071,597 tCO<sub>2</sub> equivalents of credits eligible for issuance as VCUs.

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## 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 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. ESI 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:

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) Below Ground Biomass (included) Deadwood (included) Harvested Wood Products (excluded) Litter (excluded) Soil Organic Carbon (excluded) Sources: Baseline Scenario - Biomass Burning and Livestock Emissions (excluded) 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 Project Crediting Period: 01 January 2010 – 31 December 2069 First Monitoring Period: 01 January 2010 – 31 December 2015 <b>Second Monitoring Period: 01 January 2016 – 31 December 2017</b>

Project Boundary	Monduliri Province, Cambodia Project Area: 166,983 ha (within the KSWC Core Protection Area) 106°55'15.7"E 12°8'13.109"N Communities: 6 Commune Councils, 17 key villages (3 other user villages)
GHG reduction and/or removal	4,523,996 tCO <sub>2</sub> e. This value is gross of the 10% (452,398 tCO <sub>2</sub> 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](http://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 (v3.7, 21 June 2017)*
- *VCS Standard (v3.7, 21 June 2017)*
- *Agriculture, Forestry and Other Land Use (AFOLU) Requirements (v3.6, 21 June 2017)*
- *VCS Program Definitions (v3.7, 21 June 2017)*
- *AFOLU Non-Permanence Risk Tool (v3.3, 19 October 2016)*
- *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). ESI 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 Monduliri Province of Cambodia and is aimed at reducing emissions related to unplanned deforestation. The project is expected to result in emission reductions of at least 14 million tCO<sub>2</sub>e from avoided unplanned deforestation over the next 10 years. 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.

## VERIFICATION PROCESS

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

For VCS/CCB verifications, ESI maintains an experienced internal staff of Lead Verifiers, in addition to Certified Foresters, Registered Professional Foresters, TWS Wildlife Biologists, M.S. and PhD Forest Biometricians, Remote Sensing/GIS Specialists, and VCS approved AFOLU Experts in IFM, REDD, and WRC categories. ESI's own Lead Verifiers and Project Specialists were onsite conducting the field verification activities, and subcontractors included on the audit team were employed for translation services (as applicable). ESI completes all calculation/modeling review in-house with our team of forest biometricians. ESI has been involved in 34 VCS verifications and 31 CCB verifications, including a large number of methodology assessments. ESI has a specialist on staff with 8 years of CCB experience who handles all CCB components for project review. All ESI staff involved in the audit have ecological, biodiversity, natural resources and forestry background to fulfill these requirements.

### 1.6 Method and Criteria

The verification assessed the Project's compliance with VCS Version 3, 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. ESI assessed the Greenhouse Gas (GHG) emission removals for the second monitoring period/verification period (01 January 2016 – 31 December 2017 - 2 years) through Agriculture, Forestry and Other Land Use (AFOLU) criteria, specifically; Reduced Emissions from Deforestation and Degradation (REDD) activities. ESI 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 & 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.

## **1.7 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.

## 1.8 Interviews

Interviews were performed during the verification site inspection and as part of the overall verification process which was additional to that provided in the project description, monitoring report and any supporting documents. 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	Wildlife Conservation Society	Deputy Secretary General & National REDD+ Focal Point
Alistair Mold	Wildlife Conservation Society	Operations Manager
Ken Rotha	Wildlife Conservation Society	Country Program Director of WCS Cambodia
Donal Yeang	Wildlife Conservation Society	REDD+ Specialist
Jeffrey Silverman	Wildlife Conservation Society	Senior Technical Advisor
Tan Setha	Wildlife Conservation Society	Protected Area Management Advisor
Hach Chhom	Cambodian Rural Development Team	Project Manager
Mr. Sarak	Ou Rona Community	Savings Group member

Mr. Hawn Horng	Ou Rona Community	Savings Group member
Mr. Samoeun	Ou Rona Community	Savings Group member
Toem Tach	Ou Rona Community	Water Committee
Mr. Dim Hear	Ou Char Community	Village Leader
Ms. Danh Salon	Ou Char Community	Village Leader
31 Community Members (sign-in sheets on file)	Pu Kong Community	Patrol Group members and other community members.
17 Community Members counted	Andoung Kraloeng Community	Discussions about indigenous land titling
22 Community Members (sign-in sheets on file)	Srae Andol and nearby communities	Meeting to discuss project activities and speak with auditors
Nach Norb	Jahoo Gibbons Camp	Manager/Guide
4 unnamed women	Jahoo Gibbons Camp	Chefs
Khun Diyon	Elephant Valley Project	Director
Mr. Ponlok	Elephant Valley Project	Vice-Director
Mr. Sareth	Elephant Valley Project	Officer
Sam Of Nuth	World Hope	Representative
Ly Sitha	World Hope	Representative

## 1.9 Site Inspections

The verification site inspection followed the VVB's prepared Verification and Sampling Plan process and was conducted on 06-12 May 2018 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: Phnom Penh, Pu Trom, Pu Char, Jahoo camp, Ou Chrar, Andoung Kraloeng, Chakchar, Khmom, and Senmonorom. 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 Non-Permanence Risk score claimed for the project (see Section 1.20.3 of this report for more details)
- Interviewed project staff (see Section 1.8 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

### **1.10 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 five (5) formal round 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 one category:

- 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, forty-four (44) essential VCS findings were identified. Detailed summaries of each VCS finding, including the issue raised, responses, and final conclusions, are provided in Appendix B VCS NCRS/CLS/OFI SUMMARY. Please also see APPENDIX C: CCB NCRS/CLS/OFI SUMMARY for all findings raised during the CCB review. All NCRs/CLs were satisfactorily addressed.

### **1.10.1 Forward Action Requests**

A forward action request (FAR) was raised for the benefit of future verifications regarding Indicator G5.5 for limited land availability in the project zone and local pressures. Future auditors should investigate whether land either titled to indigenous communities or recognized as belonging to indigenous communities is sufficient to sustain the communities. Future community needs may increase pressure on project area lands and reduce the current high levels of cooperation between communities and project developers, unless alternative income opportunities and/or improved agricultural methods are successful. Please also see Appendix C Indicator G5.5 and Section 4.3.12 of this report for additional details.

CCB Indicator G3.12 prescribes worker safety requirements and best practice guidelines to ensure staff are informed of risks and mitigation measures have been considered. The verification team understands that recent events involving patrol members prompted the development of a law enforcement standard operating procedure (SOP). However, since the incident in question did not occur during the monitoring period, a forward action request is issued so the SOP can be examined during the next verification audit. Please see Appendix C for additional details under the indicator.

### 1.11 Eligibility for Validation Activities

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

## VALIDATION FINDINGS

### 1.12 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.

### 1.13 Methodology Deviations

There was one methodology deviation applied for this period 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 permissible 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,<sup>1</sup> available on the VCS website, for details.

### 1.14 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 previous reporting period and was

<sup>1</sup> [https://www.vcsprojectdatabase.org/#/project\\_details/1650](https://www.vcsprojectdatabase.org/#/project_details/1650)

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.

### **1.15 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.

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

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

## **VERIFICATION FINDINGS**

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

The public comment period was held from 25 April 2018 to 25 May 2018. No public comments were received for this project as confirmed by an email from VCS on 29 May 2018, the date after the VCS and CCB public comment period for draft project documents expired.

### **1.18 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.

### **1.19 General**

#### **1.19.1 Implementation Status (G1.9)**

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 second 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, 2016 through December 31st, 2017 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 4,523,996 tCO<sub>2</sub>e.

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.

A single new methodology deviation relating to monitoring and/or measurement of GHG emission reductions or removals was applied by the project developer/identified by ESI 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.

#### **1.19.2 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 confirmed 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.

### 1.19.3 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
- Seima Trust Fund 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.

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

The monitoring report discusses how original project documentation was distributed and discussed, in May 2016 (during this monitoring period). 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,

Table 2.16 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. Some community members said they were briefed by their leaders on the project monitoring report. A small number said they were not. The verification team confirmed that virtually all community members and stakeholders were aware of the project. Many were aware auditors were visiting, though understanding the purpose for visiting was not always clear. A meeting of community leaders of Bunong communities was in progress during the site visit, which the auditors joined. 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. While no posters or announcements of the auditor site visit were seen, little information of any kind seemed to be disseminated this way in the local communities, likely because it would be ineffective in an area with low literacy rates. The methods for dissemination of project information, especially to local communities, appears to be effective.

#### **1.19.5 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.

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

The communities of the project area are indigenous Bunong communities. Since 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. Most community leaders are men, though some community representatives are women. Women participated 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.

#### **1.19.7 Anti-discrimination (G3.7)**

The monitoring report states, “Labor Law article 12, requires that all employers ‘not discriminate against any individual based on race, religion, sex, age, wealth, disability, marital status, parental status, or sexual orientation.’ This also makes sense for sound practical reasons, such as increasing the ability of the project workforce to communicate with local indigenous communities, and to deal with cultural gender barriers. Government staff assigned to the project is selected according to government procedures and policies, which can be assumed to be compliant with the law.” The monitoring report further explains WCS hiring procedures, which is geared toward recruiting under-represented groups.

The verification team reasonably assumes the Cambodian government, which is the project proponent, is following its own laws regarding employment. If WCS hiring procedures are followed, discrimination and harassment in hiring would likely be uncommon.

#### **1.19.8 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.

#### **1.19.9 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 2.14 and 2.15 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 ecotourism-related 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. At least

one local community member interviewed was a ranger with the Ministry of Environment. It is clear to the verification team that the project is building local capacity through job skills training which is on-going.

#### **1.19.10 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 – G4.2 was confirmed through interviews and the is most exhibited in the quality of the development of the project.

#### **1.19.11 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.

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

Indicator G5.1: The MIR states, “The KSWs REDD+ project is one of the country’s first REDD+ demonstration projects and is specifically listed as such in Cambodia’s National REDD+ Readiness Roadmap (RGC 2010). This constitutes evidence of approval from the formal authorities.” 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 anticipates no involuntary relocations of legitimate occupants of the area from either residential land or farmland. 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

Indicator G5.4: The illegal activities that would affect climate, biodiversity and community well-being 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 appears to be very good.

Indicator 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. Several community leaders mentioned there could be a need for more land, as community populations increased.

However, due to limited land availability in the project zone, project developers should pay special attention to whether land use needs of existing communities are growing, and adopting ways of reducing the need for additional land, through improved agricultural techniques, alternative livelihoods, etc. This Indicator was included as a forward action request in Section 2.6.1 of this report.

**1.19.13 Legal Status (G5.6)**

The monitoring report lists 9 national laws and 8 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

**1.20 Climate**

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

ESI 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 review:

<b>Data Unit / Parameter</b>	<b>Accuracy of GHG emission reductions and removals</b>	<b>Whether methods and formulae set out in the PD have been followed</b>	<b>Appropriateness of default values</b>
<i>Ap</i>	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)

<i>ABSLLK</i>	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)
<i>ABSLPA<sub>i,t</sub></i>	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)
<i>ABSLRR<sub>i,t</sub></i>	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)
<i>ABSLPAct,t</i>	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)
<i>ABSLRRct,t</i>	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)
<i>CF<sub>dc</sub></i>	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)
<i>CF<sub>j</sub></i>	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)
<i>cl</i>	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)
<i>d1, d2, ..., dn</i>	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)

<i>DBH</i>	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)
<i>ACPAicl,t</i>	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.
<i>APDPAicl,t</i>	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.
<i>APFPAicl,t</i>	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.
<i>APLPAicl,t</i>	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.
<i>APNiPAicl,t</i>	N/A (parameter not applied this period)	N/A (parameter not applied this period)	N/A (parameter not applied this period)
<i>APSLKfcl,t</i>	N/A (parameter not applied this period)	N/A (parameter not applied this period)	N/A (parameter not applied this period)
<i>AUFPAicl,t</i>	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.

### **1.20.2 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 3, 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.

### **1.20.3 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
<b>Internal Risks</b>		
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.	A risk rating of <b>-2</b> 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 between 4 and 7 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 <b>3</b> is appropriate given the rationale provided and all statements made are substantiated.
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 <b>-2</b> 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	A risk rating of <b>0</b> is appropriate given the rationale provided.

	covers the entire project lifetime. As such, the value applied was appropriate.	
<b>Total Internal Risks</b>		<b>0</b>
<b>External Risks</b>		
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 <b>0</b> 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 <b>-5</b> 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 <b>2</b> is appropriate given the rationale provided.
<b>Total External Risks</b>		<b>0</b>
<b>Natural Risks</b>		
Natural Risk	<p>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.</p> <p>Verification Team agrees that the forests of the project area have a high species diversity and therefore resistant to catastrophic disturbance caused by insect pests or forests diseases.</p> <p>Project proponents appropriately base risk of</p>	A combined natural risk rating of <b>5.0</b> is appropriate given the rationale provided and all statements made are substantiated.

	<p>extreme weather risk rating from the likelihood of wind disturbance which could influence carbon stocks.</p> <p>Local geology (i.e. volcanos, fault lines) are not active in the project area and the risk rating was appropriately given.</p>	
<b>Total Natural Risks</b>		<b>5.0</b>
<b>Overall Risk Rating = 5%</b> <b>Non-Permanence Risk Rating = 10%</b>		

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.

**1.20.4 Dissemination of Monitoring Plan and Results (CL4.2)**

This CCB Indicator is met through successful satisfaction of Indicator G3.1, described in this report Section 4.3.4. 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.

**1.20.5 Optional Gold Level: Climate Change Adaptation Measures (GL1.3)**

This Indicator not applicable.

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

This Indicator not applicable.

**1.21 Community**

**1.21.1 Community Impacts (CM2.1)**

Project actions and positive impacts were listed and described in table 7.1 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.

#### **1.21.2 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, though concern was expressed regarding future land needs that may go beyond the lands being allocated for community use (Please also see indicator G5.5 under Section 4.5.12 of this report).

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

Section 4.1.3 of the monitoring report includes a discussion on the results of the 2017 Basin Needs Survey. A table is also provided, showing the trend for each indicator. For most indicators, the trends are in a positive direction or neutral, especially in comparison with the expected 'no project' trends. 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.

#### **1.21.4 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 it's goals are to protect them. However, if unforeseen impacts occur, HCVs are monitored through remote sensing, through patrols, and also through direct consultation with communities.

#### **1.21.5 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.

#### **1.21.6 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.

#### **1.21.7 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.

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

This Indicator not applicable.

**1.21.9 Optional Gold Level: Smallholder/community member Risks (GL2.3)**

This Indicator not applicable.

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

This Indicator not applicable.

**1.21.11 Optional Gold Level: Net Impacts on Women (GL2.5)**

This Indicator not applicable.

**1.21.12 Optional Gold Level: Benefit Sharing Mechanisms (GL2.6)**

This Indicator not applicable.

**1.21.13 Optional Gold Level: Governance and Implementation Structures (GL2.8)**

This Indicator not applicable.

**1.21.14 Optional Gold Level: Smallholders/Community Members Capacity Development (GL2.9)**

This Indicator not applicable.

**1.22 Biodiversity****1.22.1 Biodiversity Changes (B2.1)**

The monitoring report states that the project seeks to maintain the forest intact swamp through deforestation and degradation prevention, 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.

**1.22.2 Mitigation Actions (B2.3)**

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.

### 1.22.3 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. Several orangutan nests were spotted, and the calls of gibbons were heard during the site visit. 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.

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

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.

### 1.22.5 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 tree species that either have been used or might be used in future tree plantings. The verification team checked that each species was listed on the ISSG.org invasive species database (accessed 20 September 2018) and none are considered invasive in Cambodia.

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

The project proponents state that no non-native species are used in the project, and the list provide was confirmed. No non-native species are used in the project. All species listed in table 5.2 of the monitoring report were checked by the verification team against the IUCN Red List, to see where they were native. All were confirmed listed as native to Cambodia, with the exception of *Dalbergia oliveri*, which is listed as endangered and native to surrounding countries (Vietnam and Thailand). One species was not on the Red List but is included on the Encyclopedia of Life website (EOL.org), which lists it as native to Cambodia.

### 1.22.7 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.

### 1.22.8 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.

### 1.22.9 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.

### 1.22.10 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.

### 1.22.11 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, fecal DNA, 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.

#### **1.22.12 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.

#### **1.22.13 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.

#### **1.22.14 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.

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

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

### **1.24 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.

## **VERIFICATION CONCLUSION**

After review of all project information, procedures, calculations, and supporting documentation, ESI confirms that the monitoring conducted by the project proponent, along with the supporting Monitoring Report, are accurate and consistent with all aforementioned VCS Version 3 and CCB Third Edition criteria, the validated PD, and the selected methodology (VM0015). ESI confirms that Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary Project Monitoring Report (v3.4 dated 19 November 2018) has been implemented in accordance with the validated PD.

ESI confirms all verification activities, including objectives, scope and criteria, level of assurance, validated Project Description implementation, and project monitoring report adherence to VCS

Version 3 (and all associated updates), and CCB Project Design Standards (Third Edition), as documented in this report are complete. ESI concludes without any qualifications or limiting conditions that Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary Project Monitoring Report (v3.4 dated 19 November 2018) meets the requirements of Version 3 (and all associated updates) and CCB Project Design Standards (Third Edition) for the verification period/reporting period (01 January 2016 – 31 December 2017 - 2-years). In addition, ESI 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 ESI has resulted in the GHG emissions reduction or removal of 4,523,996 tCO<sub>2</sub> 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% (452,398 tCO<sub>2</sub> equivalents) buffer withholding based on the non-permanence risk assessment tool. This results in 4,071,597 tCO<sub>2</sub> equivalents of credits eligible for issuance as VCUs.

Monitoring period: From 01 January 2016 to 31 December 2017

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

Year	Baseline emissions or removals (tCO <sub>2</sub> e)	Project emissions or removals (tCO <sub>2</sub> e)	Leakage emissions (tCO <sub>2</sub> e)	Net GHG emission reductions or removals (tCO <sub>2</sub> e)
2016	2,966,841	447,323	0	2,519,518
2017	2,459,511	455,033	0	2,004,479
<b>Total</b>	<b>5,426,352</b>	<b>902,355</b>	<b>0</b>	<b>4,523,996</b>

## APPENDIX A: DOCUMENTS RECEIVED/REVIEWED

Documents received 03 April 2018

- KSWs REDD+ MIR Period 2 v1.0.doc

Documents received 12 April 2018

- 1. Law Enforcement
  - Annual Report
    - SMART
      - Grid Patrol Coverage for LE Team (Jan16 to Jan18).jpg
      - 2016\_SMART Summary Report (1st Jan-31st Dec\_2016).docx
      - 2017 SMART Data for KSWs.xlsx
      - Grid Patrol Coverage for CPT (Jan16 to Jan18).jpg
  - Community Patrol Teams
    - Monthly Reports
      - 2017
        - Monthly report in Dec 2017 - Edit.docx
      - 2018
        - 1. January
        - 2. February
          - Report to KSWs in February 2018.pdf
        - 3. March
          - CPT Report in March 2018.pdf
- 2. Biodiversity
  - Monthly Reports
    - 2017
      - 10. October
      - 11. November
    - 2018
      - 1. January
      - 2. February
        - Monthly report in Feb 2018.pdf
- 3. Community
  - NGOs Partner Reports 2016-2017
    - CRDT
      - Mung bean\_Performance Report\_June 2017.pdf
      - Cambodian-Rural-Development-Team-Annual-Report-2016.pdf
      - Clean Water System in Pu-char\_2017.pdf
      - DAP Report Jan-Dec 2016.pdf
      - Monthly reports to WCS in Jan-July , 2106.pdf
    - Elephant Valley Project (EVP)
      - Annual Report 2016\_KH.pdf
      - Annual Report 2017\_KH.pdf
    - KAFDOC
      - Annual-report-2017.pdf
    - World Hope International (WHI)
      - Annual Report
        - WHI\_AnnualReport\_2016.pdf
      - Newsletter

- WHI\_NL\_1117Web.pdf
    - Newsletter\Water in AK.pdf
  - REDD+ Activities
    - KSWs REDD+ Workshop 2017
      - Minute of Workshop on 24-03-2017 in Senmorom town.pdf
    - REDD+ Benefit Sharing Consultation Meeting 2017
      - Report on REDD+ Benefit Sharing\_27 June 2017.pdf
- 4. Carbon Calculations
  - 05\_2017\_verification\_calculations\_v0.4.xlsx
- 5. Operations
  - KSWs Annual Report to MoE\_KH 2016-2017
    - 2016
      - KSWs annual Report Jun 2016-Jun 2017.pdf
    - 2017
      - Annual Report to GDANCP-MoE 2017.pdf
  - KSWs REDD+ Newsletters 2016-2017
    - 2016
      - Seima REDD Newsletter\_2 January-Marh 2016.pdf
      - Seima REDD Newsletter\_3 April-June 2016.pdf
      - Seima REDD Newsletter\_4 July-Sept 2016.pdf
    - 2017
      - Keo Seima REDD+ Newsletter 6\_Jan-Mar\_2017.pdf
      - Keo Seima REDD+ Newsletter 7\_Apr-Jun 2017.pdf
      - Keo Seima REDD+ Newsletter 8\_Jul-Sep\_2017.pdf
      - Keo Seima REDD+ Newsletter 9\_Oct-Dec 2017.pdf
    - 2018
  - Seima Annual Report Meetings 2016-2017
    - 2016
      - Agenda
        - Agenda Community Meeting.docx
        - Agenda of Community Consultation.docx
      - Attendance list
        - Seima Annual Report Meetings 2016-2017\2016\Attendance list\Att\_8-10\_08\_2016.pdf
        - Attendant list consultation meeting on 15 Aug 2016.pdf
        - Attendance list\Attendant list WCS staff.pdf
      - Photo
        - IMG\_2459.JPG – IMG\_2882.JPG
      - PPTs
        - CRDT presentation in 10 August-2016\_Chhorn.ppt
        - Finance Presentation-Sopheap.pptx
        - Presentation of CPT in 2016\_Em Try.ppt
        - Presentation on ICT progresss update\_Saly Por.pptx
        - WCS Presentation 22\_04\_2015 Jahoo Camp visit\_Seoung.pptx
        - Wildlife Biodiversity conservation in KSWs,2016\_Doeun.pptx
        - Workshop 25Jul16 KSWs benefit sharing model 2016.pptx
        - គម្រោងអង្កេតស្រាវជ្រាវស្តីពីការអភិវឌ្ឍន៍\_Donal.pptx
        - ផែនការគ្រួសារក្នុងស្ថានភាពសហគមន៍\_Rithiny.pptx
      - Report on Annual Consultation Meeting\_KSWs\_2016.pdf

- 2017
  - Agenda
    - Draft
      - 17-06-15\_Schedule for develop KSWs Work P\_DY.docx
      - 17-06-20\_Schedule for develop KSWs Work P\_KH.pdf
      - 17-06-20\_Schedule for develop KSWs Work PI.pdf
    - Attendance List
      - Annual workshop attendent lists at KSWs.pdf
      - Attendent lists at KSWs.pdf
    - Minute
      - English
        - Note Annual Meeting\_26 June.docx
      - Khmer
        - Clean
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Minute\_KSWs\_Draft\_KH\_DY.docx
          - 06.17 Meeting Minute\_KSWs\_Draft\_KH\_DY.pdf
        - 06.17 Meeting Minute\_KSWs\_Draft\_KH\_DY.docx
        - 17-06-26-Minute Annual Work Plan Meeting.pdf
        - Minute Annual Meeting by Ki Heab\_KH.pdf
    - Photo
      - IMG\_1608.JPG - IMG\_1638.JPG
    - PPTs
      - 2017 - June - 26 គម្រោងទេសចរណ៍ធម្មជាតិក្នុងដែន [Repaired].pptx
      - Annual Report KSWs REDD+ Project.pptx
      - Development and Conservation Affort\_WHI.pptx
      - ELIE 2016 Summary presentation - WCS planning Meeting.pptx
      - Presentation ICT Result 2017.pptx
      - WCS Comms Activities & Results\_Khmer.pptx
      - Wildlife monitoring in KSWs Seima, Monulkiri.pptx
      - គម្រោងអង្កេតសត្វព្រៃក្នុងដែនដីសម្រាប់ការអភិរក្ស\_Donal.pptx
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      - LULUC\_2015\_2017.tif.vat.dbf
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        - REDD\_Communes\_polygon.shp
      - Roads

- Seima\_roads.shp
  - Villages
    - REDD\_User\_Villages.shp
- Boundaries
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  - leakage\_belt\_wgs84\_utm48n.shp
  - project\_area\_wgs84\_utm48n.shp
  - project\_area\_wgs84\_utm48n.shp.xml"
- Risk Assessment
  - VCS Non-Permanence Risk Report v2.5.doc

Documents received 13 April 2018

- 009-Wildlife-VCS-CCB\_Verification Sampling Plan\_Finalv1\_signed\_20180412(1).pdf

Documents received 07 May 2018

- VCS Risk Tool KSWs 2017 update v1.0.xlsx
- Audited\_Financial\_Statements\_2017\_WCS.pdf
- Seima Expense and budget Jan-Dec'17.xls
- Seima expense and budget 2016.xls
- VCS Non-Permanence Risk Report 2017 v1.doc

Documents received 03 August 2018

- RS responses.docx

Documents received 06 August 2018

- KSWs\_REDD\_MIR\_Period\_2\_v2.6.docx

Documents received 08 August 2018

- KSWs\_REDD\_MIR\_Period\_2\_v2.6.docx
- 0. VCS and CCBA Findings
  - VCS Findings
    - VO18009\_KeoSeima\_VCS\_Round1Findings\_20180805.xlsx
  - CCBA Findings
    - VO009\_KeoSeima\_CCB\_Round1NCRS\_20180601\_WCS.docx
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- 1. Law Enforcement
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  - Annual Report
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      - Grid Patrol Coverage for LE Team (Jan16 to Jan18).jpg
      - 2016\_SMART Summary Report (1st Jan-31st Dec\_2016).docx
      - 2017 SMART Data for KSWs.xlsx
      - Grid Patrol Coverage for CPT (Jan16 to Jan18).jpg
  - Community Patrol Teams
    - Monthly Reports
      - 2018
        - 1. January- file was empty

- 2. February
      - Report to KSWs in February 2018.pdf
    - 3. March
      - CPT Report in March 2018.pdf
  - 2017
    - Monthly report in Dec 2017 - Edit.docx
- 2. Biodiversity
  - Monthly Reports
    - 2018
      - 1. January – file was empty
      - 2. February
        - Monthly report in Feb 2018.pdf
      - 3. March – file was empty
    - 2017
      - 10. October – file was empty
      - 11. November – file was empty
- 3. Community
  - Social Impacts
    - KSWs\_SIA\_report\_2017.pdf
  - Eco-tourism
    - Monthly Reports
      - 3. March – file was empty
    - Annual Report- file was empty
  - ICT – file was empty
  - NGOs Partner Reports 2016-2017
    - World Hope International (WHI)
      - Newsletter
        - WHI\_NL\_1117Web.pdf
        - Water in AK.pdf
      - Annual Report
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      - Cambodian-Rural-Development-Team-Annual-Report-2016.pdf
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      - Minute of Workshop on 24-03-2017 in Senmorom town.pdf
- 4. Carbon Calculations
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- Minute
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    - Attendant list consultation meeting on 15 Aug 2016.pdf
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    - Presentation on ICT progresss update\_Saly Por.pptx
    - WCS Presentation 22\_04\_2015 Jahoo Camp visit\_Seoung.pptx
    - Wildlife Biodiversity conservation in KSWS,2016\_Doeun.pptx
    - Workshop 25Jul16 KSWS benefit sharing model 2016.pptx
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  - WCS Financial and Anti-Corruption Policies
    - WCS flow chart policy for Purchase Requests\_new.pdf
    - Audit Pages from Global Admin & Finance Manual 01\_2011 Version.pdf
    - WCS flow chart policy for Field Expenses Reports.pdf
    - WCS flow chart policy for Operating Expenses.pdf
    - WCS flow chart policy for Payment Advance.pdf
- 6. Public Comment Period Report
  - CCBA Public Comment Period Report\_May 2018\_Eng.pdf
- 7. KSWS Monthly Report to MoE – this file was empty
- 8. GIS

- Boundaries
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  - KSWs\_boundary\_wgs84\_utm48n.sbn
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      - 125\_051\_20180116\_I8.img
      - 125\_052\_20160228\_I8.img
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- REDD\_User\_Villages.dbf
- REDD\_User\_Villages.prj
- REDD\_User\_Villages.sbn
- REDD\_User\_Villages.sbx
- REDD\_User\_Villages.shp
- REDD\_User\_Villages.shp.xml
- Communes
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  - MDK\_Communes\_polygon.dbf
  - MDK\_Communes\_polygon.prj
  - MDK\_Communes\_polygon.sbn
  - MDK\_Communes\_polygon.sbx
  - MDK\_Communes\_polygon.shp
  - MDK\_Communes\_polygon.shp.xml
  - MDK\_Communes\_polygon.shx
  - REDD\_Communes\_polygon.cpg
  - REDD\_Communes\_polygon.dbf
  - REDD\_Communes\_polygon.prj
  - REDD\_Communes\_polygon.sbn
  - REDD\_Communes\_polygon.sbx
  - REDD\_Communes\_polygon.shp
  - REDD\_Communes\_polygon.shp.xml
- Roads
  - Seima\_roads.shp.xml
  - Seima\_roads.shx
  - Seima\_roads.cpg
  - Seima\_roads.dbf
  - Seima\_roads.prj
  - Seima\_roads.sbn
  - Seima\_roads.sbx
  - Seima\_roads.shp
- 9. Risk Report
  - VCS Non-Permanence Risk Report 2017 v2.0.doc
  - Supporting Documents
    - Menghor Letter.pdf
    - Global Risk Data Platform results.docx
    - KSWs\_financial\_projections\_v2.2.xlsx
    - Large Area Deforestation from Uncontrolled Fire and Disease.docx
  - KSWs-Risk-Report-Calculation v1.1.xls

Documents received 17 September 2018

- KSWs\_REDD\_MIR\_Period\_2\_v2.9.docx
- 0. VCS and CCBA Findings
  - VCS Findings
    - VO18009\_KeoSeima\_VCS\_Round2Findings\_20180918.xlsx
    - VO18009\_KeoSeima\_VCS\_Round1Findings\_20180805.xlsx
    - VO18009\_KeoSeima\_VCS\_Round2Findings\_20180907.xlsx

- CCBA Findings
  - VO009\_KeoSeima\_CCB\_Round1NCRS\_20180601\_WCS.docx
  - 0. Obsolete
    - VO009\_KeoSeima\_CCB\_Round1NCRS\_20180601.pdf
    - VO009\_KeoSeima\_CCB\_Round1NCRS\_20180601.docx
  - CCBA round 2 responses.docx
- 1. Law Enforcement
  - Monthly Reports
    - 2018
      - 201807\_KSWS\_LE\_Report\_July.pdf
      - 201801\_KSWS\_LE\_Report\_Jan.pdf
      - 201802\_KSWS\_LE\_Report\_Feb.pdf
      - 201803\_KSWS\_LE\_Report\_Mar.pdf
      - 201804\_KSWS\_LE\_Report\_April.pdf
      - 201805\_KSWS\_LE\_Report\_May.pdf
      - 201806\_KSWS\_LE\_Report\_June.pdf
    - 2016
      - Note for May-June-July.txt
      - 201601\_SMART\_Patrol\_Report\_Jan.pdf
      - 201602\_SPF\_SMART\_Patrol\_Report\_Feb.pdf
      - 201603\_SPF\_LE\_Report\_Mar.pdf
      - 201604\_SMART\_Patrol\_Report\_Apr.pdf
      - 201608\_KSWS\_LE\_SMART\_Monthly\_Report\_Aug.pdf
      - 201609\_KSWS\_LE\_SMART\_Monthly\_Report\_Sep.pdf
      - 201610\_KSWS\_LE\_SMART\_Monthly\_Report\_Oct.pdf
      - 201611\_KSWS\_LE\_SMART\_Monthly\_Report\_Nov.pdf
      - 201612\_KSWS\_LE\_Report\_Jan.pdf
    - 2017
      - 201712\_KSWS\_LE\_Report\_Dec.pdf
      - 201701\_KSWS\_LE\_Report\_Jan.pdf
      - 201702\_KSWS\_LE\_Report\_Feb.pdf
      - 201703\_KSWS\_LE\_Report\_Mar.pdf
      - 201704\_KSWS\_LE\_Report\_Apr.pdf
      - 201705\_KSWS\_LE\_Report\_May.pdf
      - 201706\_KSWS\_LE\_Report\_Jun.pdf
      - 201707\_KSWS\_LE\_Report\_Jul.pdf
      - 201708\_KSWS\_LE\_Report\_Aug.pdf
      - 201709\_KSWS\_LE\_Report\_Sep.pdf
      - 201710\_KSWS\_LE\_Report\_Oct.pdf
      - 201711\_KSWS\_LE\_Report\_Nov.pdf
  - Annual Report
    - SMART
      - Grid Patrol Coverage for LE Team (Jan16 to Jan18).jpg
      - 2016\_SMART Summary Report (1st Jan-31st Dec\_2016).docx
      - 2017 SMART Data for KSWS.xlsx
      - Grid Patrol Coverage for CPT (Jan16 to Jan18).jpg
  - Community Patrol Teams
    - Monthly Reports
      - 2018

- 201807\_KSWS\_Com\_Report\_July.pdf
  - 201801\_KSWS\_Com\_Report\_Jan.pdf
  - 201802\_KSWS\_Com\_Report\_Feb.pdf
  - 201803\_KSWS\_Com\_Report\_Mar.pdf
  - 201804\_KSWS\_Com\_Report\_April.pdf
  - 201805\_KSWS\_Com\_Report\_May.pdf
  - 201806\_KSWS\_Com\_Report\_June.pdf
- 2016
  - Note for May-June-July.txt
  - 201601\_SPF\_Communtiy\_\_SMART\_Report\_Jan.pdf
  - 201602\_SPF\_Community\_Report\_Feb.pdf
  - 201603\_SPF\_Com\_Report\_Mar.pdf
  - 201608\_KSWS\_Com\_SMART\_Monthly\_Report\_Aug.pdf
  - 201609\_KSWS\_Com\_SMART\_Monthly\_Report\_Sep.pdf
  - 201610\_KSWS\_Com\_SMART\_Monthly\_Report\_Oct.pdf
  - 201611\_KSWS\_Com\_SMART\_Monthly\_Report\_Nov.pdf
  - 201612\_KSWS\_Com\_SMART\_Monthly\_Report\_Dec.pdf
- 2017
  - 201712\_KSWS\_Com\_Report\_Dec.pdf
  - 201701\_KSWS\_Com\_SMART\_Monthly\_Report\_Jan.pdf
  - 201702\_KSWS\_Com\_SMART\_Monthly\_Report\_Feb.pdf
  - 201703\_KSWS\_Com\_SMART\_Monthly\_Report\_Mar.pdf
  - 201704\_KSWS\_Com\_SMART\_Monthly\_Report\_Apr.pdf
  - 201705\_KSWS\_Com\_SMART\_Monthly\_Report\_May.pdf
  - 201706\_KSWS\_Com\_SMART\_Monthly\_Report\_Jun.pdf
  - 201707\_KSWS\_Com\_Report\_Jul.pdf
  - 201708\_KSWS\_Com\_Report\_Aug.pdf
  - 201709\_KSWS\_Com\_Report\_Sep.pdf
  - 201710\_KSWS\_Com\_Report\_Oct.pdf
  - 201711\_KSWS\_Com\_Report\_Nov.pdf
- 2. Biodiversity
  - SMART Reports
    - Drawing.vsdX
    - 2016
      - 201612\_KSWS\_Research\_SMART\_Monthly\_Report\_Dec.pdf
      - 201601\_SPF\_SMART\_Snare\_Report\_Jan.pdf
      - 201602\_KSWS\_Research\_SMART\_Monthly\_Report\_Feb.pdf
      - 201603\_SMART\_Snare\_Report\_Mar.pdf
      - 201609\_KSWS\_Research\_SMART\_Monthly\_Report\_Sep.pdf
      - 201610\_KSWS\_Research\_SMART\_Monthly\_Report\_Oct.pdf
      - 201611\_KSWS\_Research\_SMART\_Monthly\_Report\_Nov.pdf
    - 2017
      - 201712\_KPWS\_Sur\_Report\_Dec.pdf
      - 201701\_KSWS\_Research\_SMART\_Monthly\_Report\_Jan.pdf
      - 201702\_KSWS\_Research\_SMART\_Monthly\_Report\_Feb.pdf
      - 201703\_KSWS\_Research\_SMART\_Monthly\_Report\_Mar.pdf
      - 201704\_KSWS\_Research\_SMART\_Monthly\_Report\_Apr.pdf
      - 201705\_KSWS\_Research\_SMART\_Monthly\_Report\_May.pdf
      - 201706\_KSWS\_Research\_Report\_Jun.pdf
      - 201707\_KSWS\_Research\_Report\_Jul.pdf

- 201708\_KSWS\_Research\_Report\_Aug.pdf
    - 201709\_KSWS\_Research\_Report\_Sep.pdf
    - 201710\_KSWS\_Research\_Report\_Oct.pdf
    - 201711\_KPWS\_Sur\_Report\_Nov.pdf
  - 2018
    - 201807\_KPWS\_Research\_Report\_July.pdf
    - 201801\_KPWS\_Research\_Report\_Jan.pdf
    - 201802\_KPWS\_Research\_Report\_Feb.pdf
    - 201803\_KSWS\_Research\_Report\_Mar.pdf
    - 201804\_KPWS\_Research\_Report\_Apr.pdf
    - 201805\_KPWS\_Research\_Report\_May.pdf
    - 201806\_KPWS\_Research\_Report\_Jun.pdf
- Monthly Reports
  - 2018
    - 7. July
      - 7. Monthly report for July 2018\_KH.pdf
    - 1. January
      - 1. Monthly report in Jan 2018\_KH.pdf
    - 2. February
      - Monthly report in Feb 2018.pdf
    - 3. March (No activities for this month)
    - 4. April
      - 4. Monthly report in April 2018\_KH.pdf
    - 5. May
      - 5. Monthly report for May 2018\_KH.pdf
    - 6. June
      - 6. Monthly report for June 2018\_KH.pdf
  - 2016
    - Report of wildlife outreach in Oct 2016.pdf
    - 6 months Report Jan-Jun 2016.pdf
    - Report July-Dec-2016\_Khmer.pdf
  - 2017
    - 12. Monthly report in Dec 2017\_KH.pdf
    - 1. Monthly report in Jan 2017\_KH.pdf
    - 2. Monthly report in Feb 2017\_KH.pdf
    - 3. Monthly report in March 2017\_KH.pdf
    - 4. Monthly report in April 2017\_KH.pdf
    - 5. Monthly report in May 2017.pdf
    - 6. Monthly report in June 2017\_KH.pdf
    - 7. Monthly report in July 2017\_KH.pdf
    - 8. Monthly report in August 2017\_KH.pdf
    - 9. Monthly report in Sept 2017\_KH.pdf
    - 10. Monthly report in Oct 2017.pdf
    - 11. Monthly report in Nov 2017\_KH.pdf
- 3. Community
  - Social Impacts
    - KSWS\_SIA\_report\_2017.pdf
  - Eco-tourism
    - Reports

- Jahoo gibbon habituation status report March 2017.pdf
  - 6-Month Reports
    - KSWs Eco-Tourism July - Dec\_2017\_KH.pdf
  - Annual Report
    - KSWs Eco-Tourism Annual Report Sept 2016-Sept2017.pdf
  - Monthly Reports
    - 2018
      - 3. Eco-tourism Report March 2018.pdf
      - 1. Eco-tourism Report January 2018.pdf
      - 2. Eco-tourism Report February 2018.pdf
    - 2017
      - 11. Eco-tourism Report November 2017.pdf
      - 4. Ecotourism Report April - 2017.pdf
      - 6. Ecotourism Report June-2017.pdf
      - 7. Eco-tourism Report July 2017.pdf
      - 8. Eco-tourism Report August 2017.pdf
      - 10. Ecotourism Report October 2017.pdf
- ICT – file was empty
- NGOs Partner Reports 2016-2017
  - World Hope International (WHI)
    - Newsletter
      - WHI\_NL\_1117Web.pdf
      - Water in AK.pdf
    - Annual Report
      - WHI\_AnnualReport\_2016.pdf
  - CRDT
    - Mung bean\_Performance Report\_June 2017.pdf
    - Cambodian-Rural-Development-Team-Annual-Report-2016.pdf
    - Clean Water System in Pu-char\_2017.pdf
    - DAP Report Jan-Dec 2016.pdf
    - Monthly reports to WCS in Jan-July , 2106.pdf
  - Elephant Valley Project (EVP)
    - Annual Report 2017\_KH.pdf
    - Annual Report 2016\_KH.pdf
  - KAFDOC
    - Annual-report-2017.pdf
- REDD+ Activities
  - REDD+ Benefit Sharing Consultation Meeting 2017
    - Report on REDD+ Benefit Sharing\_27 June 2017.pdf
  - KSWs REDD+ Workshop 2017
    - Minute of Workshop on 24-03-2017 in Senmorom town.pdf
- 4. Carbon Calculations
  - 09\_2018\_verification\_calculations\_v2.0.xlsx
  - 0. Obsolete
    - 08\_2018\_verification\_calculations\_v0.6.xlsx
    - 05\_2017\_verification\_calculations\_v0.4.xlsx
- 5. Operations
  - WCS Staff Policy and Contracts
    - WCS Employment Policy Manual.pdf
    - Government Counterpart Agreement\_KH\_EN.pdf

- Local Employee Contract\_KH\_EN.pdf
  - Annual Workplans
    - Response on Finance.xlsx
    - FY17 - KSWs Annual Work Plan\_Final\_English.pdf
    - FY17-KSWs Budget Plan.doc
  - Cambodia Anti-Corruption Law
    - Cambodia Anti-Corruption Law 2010.pdf
  - KSWs Annual Report to MoE\_KH 2016-2017
    - 2017
      - Annual Report to GDANCP-MoE 2017.pdf
    - 2016
      - KSWs annual Report Jun 2016-Jun 2017.pdf
  - KSWs REDD+ Newsletters 2016-2017
    - 2018
      - Keo Seima REDD+ Newsletter\_ Jan - March 2018.pdf
      - Keo Seima REDD+ Newsletter April-June 2018.pdf
    - 2016
      - Seima REDD Newsletter\_4 July-Sept 2016.pdf
      - Keo Seima REDD+ Newsletter No. 05 (Oct - Dec 2016).pdf
      - Seima REDD Newsletter\_2 January-Marh 2016.pdf
      - Seima REDD Newsletter\_3 April-June 2016.pdf
    - 2017
      - Keo Seima REDD+ Newsletter 9\_Oct-Dec 2017.pdf
      - Keo Seima REDD+ Newsletter 6\_Jan-Mar\_2017.pdf
      - Keo Seima REDD+ Newsletter 7\_Apr-Jun 2017.pdf
      - Keo Seima REDD+ Newsletter 8\_Jul-Sep\_2017.pdf
  - Seima Annual Report Meetings 2016-2017
    - 2017
      - PPTs
        - Annual Report KSWs REDD+ Project.pptx
        - Development and Conservation Affort\_WHI.pptx
        - ELIE 2016 Summary presentation - WCS planning Meeting.pptx
        - Presentation ICT Result 2017.pptx
        - WCS Comms Activities & Results\_Khmer.pptx
        - Wildlife monitoring in KSWs Seima, Monulkiri.pptx
        - 2017 - June - 26 គម្រោងទេសចរណ៍ធម្មជាតិក្នុងដែន [Repaired].pptx
        - គម្រោងអង្កេតសត្វព្រៃក្នុងដែន\_Donal.pptx
        - របាយការណ៍ស្រាវជ្រាវស្តីពីការអង្កេតសត្វព្រៃក្នុងដែន.pptx
        - សកម្មភាព និងលទ្ធផល ២០១៦និង២០១៧ LE.ppt
        -
      - Agenda
        - 17-06-20\_Schedule for develop KSWs Work PI.pdf
        - Draft
          - 17-06-15\_Schedule for develop KSWs Work P\_DY.docx
        - 17-06-20\_Schedule for develop KSWs Work P\_KH.pdf
      - Attendance List
        - Attendent lists at KSWs.pdf
        - Annual workshop attendant lists at KSWs.pdf

- Minute
  - Khmer
    - Minute Annual Meeting by Ki Heab\_KH.pdf
    - Clean
      - 06.17 Meeting Minute\_KSWS\_Draft\_KH\_DY.pdf
      - \06.17 Meeting Minute\_KSWS\_Draft\_KH\_DY.docx
    - 06.17 Meeting Minute\_KSWS\_Draft\_KH\_DY.docx
    - 17-06-26-Minute Annual Work Plan Meeting.pdf
  - English
    - Note Annual Meeting\_26 June.docx
- Photo
  - IMG\_1638.JPG
  - IMG\_1608.JPG
  - IMG\_1609.JPG
  - IMG\_1610.JPG
  - IMG\_1634.JPG
  - IMG\_1635.JPG
  - IMG\_1636.JPG
  - IMG\_1637.JPG
- 2016
  - Report on Annual Consultation Meeting\_KSWS\_2016.pdf
  - Agenda
    - Agenda of Community Consultation.docx
    - Agenda Community Meeting.docx
  - Attendance list
    - Attendant list WCS staff.pdf
    - Att\_8-10\_08\_2016.pdf
    - Attendant list consultation meeting on 15 Aug 2016.pdf
  - Photo
    - 177 photos
  - PPTs
    - CRDT presentation in 10 August-2016\_Chhorn.ppt
    - Finance Presentation-Sopheap.pptx
    - Presentation of CPT in 2016\_Em Try.ppt
    - Presentation on ICT progress update\_Saly Por.pptx
    - WCS Presentation 22\_04\_2015 Jahoo Camp visit\_Seoung.pptx
    - Wildlife Biodiversity conservation in KSWS,2016\_Doeun.pptx"
    - Workshop 25Jul16 KSWS benefit sharing model 2016.pptx
    - គម្រោងអង្កេតស្រាវជ្រាវកសិកម្មក្រៅសីមា\_Donal.pptx
    - ផែនការគ្រួសារកសិកម្មកសិកម្មសហគមន៍\_Rithiny.pptx
  - WCS Financial and Anti-Corruption Policies
    - WCS flow chart policy for Purchase Requests\_new.pdf
    - Audit Pages from Global Admin & Finance Manual 01\_2011 Version.pdf
    - WCS flow chart policy for Field Expenses Reports.pdf
    - WCS flow chart policy for Operating Expenses.pdf
    - WCS flow chart policy for Payment Advance.pdf
- 6. Public Comment Period Report
  - CCBA Public Comment Period Report\_May 2018\_Eng.pdf
- 7. KSWS Monthly Report to MoE – file was empty

- 8. GIS
  - Boundaries – 32 items
  - Activity Data
    - region\_file\_w84\_48n.tif
    - Accuracy
      - Accuracy\_Assessment\_v4.xlsm
      - 0. Obsolete
        - full\_set.txt
        - Accuracy\_Assessment.xlsm
        - Accuracy\_Assessment\_v3.xlsm
    - Imagery
      - Landsat
        - 125\_052\_20180116\_I8.img
        - 125\_051\_20160228\_I8.img
        - 125\_051\_20180116\_I8.img
        - 125\_052\_20160228\_I8.img
    - 000\_Readme.txt
    - LULUC\_2015\_2017.tif
  - Base Data
    - Villages
      - REDD\_User\_Villages.shx
      - REDD\_User\_Villages.cpg
      - REDD\_User\_Villages.dbf
      - REDD\_User\_Villages.prj
      - REDD\_User\_Villages.sbn
      - REDD\_User\_Villages.sbx
      - REDD\_User\_Villages.shp
      - REDD\_User\_Villages.shp.xml
    - Communes
      - REDD\_Communes\_polygon.shx
      - MDK\_Communes\_polygon.cpg
      - MDK\_Communes\_polygon.dbf
      - MDK\_Communes\_polygon.prj
      - MDK\_Communes\_polygon.sbn
      - MDK\_Communes\_polygon.sbx
      - MDK\_Communes\_polygon.shp
      - MDK\_Communes\_polygon.shp.xml
      - MDK\_Communes\_polygon.shx
      - REDD\_Communes\_polygon.cpg
      - REDD\_Communes\_polygon.dbf
      - REDD\_Communes\_polygon.prj
      - REDD\_Communes\_polygon.sbn
      - REDD\_Communes\_polygon.sbx
      - REDD\_Communes\_polygon.shp
      - REDD\_Communes\_polygon.shp.xml
    - Roads
      - Seima\_roads.shx
      - Seima\_roads.cpg
      - Seima\_roads.dbf

- Seima\_roads.prj
  - Seima\_roads.sbn
  - Seima\_roads.sbx
  - Seima\_roads.shp
  - Seima\_roads.shp.xml
- 9. Risk Report
  - VCS Non-Permanence Risk Report 2017 v2.2.doc
  - Obsolete
    - VCS Non-Permanence Risk Report 2017 v2.0.doc
    - KSWs-Risk-Report-Calculation v1.1.xls
  - Supporting Documents
    - "K:\Projects-Active\2018\VO18009-00-Wildlife-VCS-CCB\Docs\2018-09-17\9. Risk Report\Supporting Documents\Revenue Breakdown v1.2.xlsx
    - Global Risk Data Platform results.docx
    - Joint Approval Workplan MoE WCS FY17.pdf
    - KSWs\_financial\_projections\_v2.2.xlsx
    - Large Area Deforestation from Uncontrolled Fire and Disease.docx
    - Menghor Letter.pdf
  - KSWs-Risk-Report-Calculation v1.2.xls
- Obsolete
  - KSWs\_REDD\_MIR\_Period\_2\_v2.8.docx
  - KSWs\_REDD\_MIR\_Period\_2\_v2.6.docx

Documents received 02 October 2018

- VO18009\_KeoSeima\_VCS\_Round3Findings\_20181002.xlsx
- KSWs\_REDD\_MIR\_Period\_2\_v3.0.docx
- 09\_2018\_verification\_calculations\_v3.0.xlsx

Documents received 05 October 2018

- VCS Non-Permanence Risk Report 2017 v2.3.doc
- 09\_2018\_verification\_calculations\_v3.1.xlsx
- KSWs-Risk-Report-Calculation v1.3.xls
- VO18009\_KeoSeima\_VCS\_Round4Findings\_20181005.xlsx
- KSWs\_REDD\_MIR\_Period\_2\_v3.1.docx

Documents received 14 October 2018

- KSWs\_REDD\_MIR\_Period\_2\_v3.2.docx
- VCS Non-Permanence Risk Report 2017 v2.4.doc
- VO18009\_KeoSeima\_VCS\_Round5Findings\_20181015.xlsx

Documents received 22 October 2018

- 009\_Wildlife\_Cambodia\_CCB\_VCS\_Verification\_Report\_ClientDraft\_20181021 JS.docx
- 009-Wildlife-VCS-CCB\_Verification Sampling Plan\_Finalv2\_20181021 Signed.pdf
- KSWs\_REDD\_MIR\_Period\_2\_v3.2.docx
- VCS Non-Permanence Risk Report 2017 v2.4.doc

Documents received 25 October 2018

- KSWs\_REDD\_MIR\_Period\_2\_v3.3.docx

Documents received 19 November 2018

- KSWs\_REDD\_MIR\_Period\_2\_v3.4.docx

Documents received 20 November 2018

- KSWs\_REDD\_MIR\_Period\_2\_v3.4.docx
- VCS Non-Permanence Risk Report 2017 v2.4.doc

**APPENDIX B: VCS NCRS/CLS/OFI SUMMARY**

<b>Item Number</b>	1
<b>VCS Standard VCS Version 3 Requirements Document 21 June 2017, v3.7</b>	3) Incorporated 24 February 2016 clarification with respect to introduction of joint templates into document text (Sections 3.16.6, 3.19.1, 5.3.6, 5.3.7)
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MIR; VCS website;
<b>ESI Findings - Initial (01 June 2018)</b>	The most recent version of the VCS+CCB Monitoring Report template from VCS' website was not utilized.
<b>Round 1 NCR/CL/OFI</b>	NCR: Please utilize the most recent version of the VCS+CCB Monitoring Report template from the VCS website.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	New template now in use
<b>ESI Findings - Round 1</b>	The verification team reviewed the updated MIR and noted that portions of the MIR do not match the most recent version of the VCS+CCB Monitoring Report template from the VCS website (ex: Sections 2.3, 2.4, 3, 5.4).
<b>Round 2 NCR/CL/OFI</b>	CL: Please follow the appropriate section headings for the most recent version of the VCS+CCB Monitoring Report template from the VCS website.
<b>Round 2 Response from Project Proponent (17 September 2018)</b>	Section headings updated to match template
<b>ESI Findings - Round 2</b>	The verification team reviewed the updated MIR and noted that the MIR's section headings now match the most version of the VCS+CCB Monitoring Report template from the VCS website. This item is addressed.
<b>Item Number</b>	2

<p><b>VCS Standard</b> <b>VCS Version 3</b> <b>Requirements Document 21 June 2017, v3.7</b></p>	<p>2) Where the deviation does not impact the applicability of the methodology, additionality or the appropriateness of the baseline scenario, and the project remains in compliance with the applied methodology, the deviation shall be described and justified in the monitoring report. This shall include a description of when the changes occurred and the reasons for the changes. The deviation shall also be described in all subsequent monitoring reports. Examples of such deviations include changes in the procedures for measurement and monitoring, or project design changes that do not have an impact on the applicability of the methodology, additionality or the appropriateness of the baseline scenario.</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	<p>MIR 4.2;</p>
<p><b>ESI Findings - Initial (01 June 2018)</b></p>	<p>The only PDD deviation noted is that the PP was changed from the Forestry Administration of the Ministry of Agriculture, Forestry, and Fisheries to the Ministry of Environment. The verification team is reasonably assured that this does not impact any applicability or eligibility requirements.</p> <p>However, the requirement is that the MIR shall include a description of the changes that occurred. This description should include a description of when the changes occurred and the reasons for the changes. As the MIR currently stands, the MIR lacks detail regarding the deviation.</p> <p>Verifiers understand that another PD deviation is warranted for use of the Sentinel 2 sensor to monitor changes to LU/LC instead of multispectral Landsat imagery as described in the PD Annex 4.5. Please see points below where the appropriateness of this deviation was evaluated:</p> <ul style="list-style-type: none"> <li>-The deviation does not impact the applicability of the methodology as the intent is to monitor forest deforestation or disturbance which the new sensor provides</li> <li>-Project additionality is not impacted</li> <li>-The baseline scenario remains unaffected as the deviation affects monitoring efforts</li> <li>-Project remains in compliance with the methodology as Sentinel 2 data is an improvement in monitoring data for the period</li> </ul> <p>Verifiers could not confirm that an adequate description and justification has been included in the MIR for this PD deviations, The use of Sentinel imagery PD deviation was confirmed to "not impact the applicability of the methodology, additionality or the appropriateness of the baseline scenario, and the project remains in compliance with the applied methodology."</p>
<p><b>Round 1 NCR/CL/OFI</b></p>	<p>CL: Please add descriptions of the deviations, per the requirements for descriptions of deviations within the MIR.</p>

<b>Round 1 Response from Project Proponent (08 August 2018)</b>	This was addressed in the gap validation issued 4 April 2017 which resulted in an updated PD which has MoE as PP as MoE. Therefore this is not a deviation for this MIR. <a href="http://vcsprojectdatabase.org/services/publicViewServices/downloadDocumentById/26934">http://vcsprojectdatabase.org/services/publicViewServices/downloadDocumentById/26934</a>
<b>ESI Findings - Round 1</b>	ESI agrees that the change of the project proponent is covered by the Gap Validation review and associated report (CCB_VALID_REP_ENG_1650_4APR2017.pdf). However, as this element is still technically a PD deviation it is required to be reported in the MIR following the VCS template, "Describe and report on any project description deviations applied in previous monitoring reports."  No PD deviations are warranted related to imagery.
<b>Round 2 NCR/CL/OFI</b>	CL: Please add descriptions of the project proponent change/Gap Validation PD deviation to the MIR following the VCS template requirements.
<b>Round 2 Response from Project Proponent (17 September 2018)</b>	The project proponent PD deviation has been added the MIR (2.2.4)
<b>ESI Findings - Round 2</b>	A PD deviation related to the change of project proponent and previous approval by the validator was confirmed appropriately added to the MIR Section 2.2.4. The item is addressed.

<b>Item Number</b>	3
<b>VCS Standard VCS Version 3 Requirements Document 21 June 2017, v3.7</b>	3.11.4 Where projects are eligible to participate under one or more programs to create another form of GHG-related environmental credit, but are not currently doing so, a list of such programs shall be provided to the validation/verification body.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	PRR; MIR;
<b>ESI Findings - Initial (01 June 2018)</b>	The VVB could not locate any reference to if the project is eligible to participate under one or more programs to create another form of GHG-related environmental credit.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify if the project is eligible to participate under one or more programs to create another form of GHG-related environmental credit. If the project is eligible, please provide a list of such programs.

<b>Round 1 Response from Project Proponent (08 August 2018)</b>	Updated in Section 2.19
<b>ESI Findings - Round 1</b>	Section 2.1.9 of the MIR states that there are currently no other crediting programs being conducted in the area. The verification team is reasonably assured that this peat project is not eligible to participate in any other GHG program. This item is addressed.

<b>Item Number</b>	4
<b>VCS AFOLU Requirements 21 June 2017, v3.6</b>	4) Clarified the process for rounding decimals with respect to buffer credit calculations (Table 4)
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	<b>05_2017_verification_calculations_v0.4 ('9 VCUs' tab)</b> <b>05_2017_verification_calculations_v0.4_ESI buffer rounding datacheck ('9 VCUs' tab)</b>
<b>ESI Findings - Initial (01 June 2018)</b>	Table 4 from the VCS requirements states, "Where the net change in carbon stocks is not a whole number, round the calculated VCU and buffer credit volumes down to the nearest whole number. Where the net change in carbon stocks is a whole number, round the calculated buffer volume up, and the VCU volume down, to the nearest whole number."  This rounding rule does not appear to have been implemented in 05_2017_verification_calculations_v0.4 ('9 VCUs' tab). Please note that these rounding rules may affect other files submitted to the verification team such as VCS Non-Permanence Risk Report v2.5, and KSWs REDD+ MIR Period 2 v1.0
<b>Round 1 NCR/CL/OFI</b>	NCR: Please correctly implement rounding rules in Table 4 from the VCS requirements which state, "Where the net change in carbon stocks is not a whole number, round the calculated VCU and buffer credit volumes down to the nearest whole number. Where the net change in carbon stocks is a whole number, round the calculated buffer volume up, and the VCU volume down, to the nearest whole number."  Please correct VCS Non-Permanence Risk Report v2.5, KSWs REDD+ MIR Period 2 v1.0, and 05_2017_verification_calculations_v0.4 ('9 VCUs' tab).
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	Completed

<b>ESI Findings - Round 1</b>	The revised VCU calcs were reviewed in response to the finding. Final calculated VCUs were found to be appropriately rounded down following this requirement and reported correctly. However, the buffer credits do not follow the rounding rules as reported in the risk report and MIR.
<b>Round 2 NCR/CL/OFI</b>	CL: Please address the findings and ensure buffer credit reporting follow VCS rounding rules.
<b>Round 2 Response from Project Proponent (17 September 2018)</b>	This has been corrected, see Table 3.22 KSWs REDD MIR Period 2 v2.8.docx, Section 4.2 of VCS Non-Permanence Risk Report 2017 v2.2.docx, green Ex-post VCUs tab of 09_2018_verification_calculations_v2.0.xlsx. Note: The buffer credit calculation produced using the Verra excel calculation tool rounds the credits up to the nearest 100 (from 452,398 to 452,400) which does not follow AFOLU Requirements v3.6 nor instructions provided in AFOLU_Non-Permanence_Risk_Tool_v3.3. This rounded up number has not been used.
<b>ESI Findings - Round 2</b>	Verifiers independently confirmed that the buffer allocation and VCUs were correctly rounded down. Reporting was confirmed correct in Table 3.23 of the MIR. The item is addressed.

<b>Item Number</b>	5
<b>VCS AFOLU Requirements 21 June 2017, v3.6</b>	3.1.1 As set out in the VCS Standard, default factors and standards used to ascertain GHG emission data and any supporting data for establishing baseline scenarios and demonstrating additionality shall be publicly available from a recognized, credible source, such as IPCC 2006 Guidelines for National GHG Inventories or the IPCC Good Practice Guidance for Land Use, Land-Use Change and Forestry. See the VCS Standard for the full rules and requirements for the use of default factors and standards.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	KSWs REDD+ MIR Period 2 v1.0 section 5.2 and 5.3

<p><b>ESI Findings - Initial (01 June 2018)</b></p>	<p>Default factors and standards used to ascertain GHG emission data and supporting data for establishing baseline scenarios and demonstrating additionality appear to be appropriately sourced from publicly available recognized, credible sources, such as IPCC 2006 Guidelines for National GHG Inventories or the IPCC Good Practice Guidance for Land Use, Land-Use Change and Forestry. However, the following items were noted by the verification team:</p> <p>1) The parameters fcl (Final post deforestation non-forest classes), icl (initial pre-deforestation forest classes), and z (Post deforestation zones having a characteristic mix of final post deforestation classes) reference PD table 4.5.1, however there appears to be no table 4.5.1 in the Validated PD.</p> <p>2) Value used in section 5.3 for CE[p,icl] (Average combustion efficiency of the carbon pool p in the forest class), justification may not be appropriate as two different forest types are referenced. Section 5.3 of the MIR states for this parameter, "<i>Value of 0.30 is used for both open and dense forest. This is the upper bound of the range for drying seasons &lt;6 months (and also the value for drying seasons &gt;6 months) for primary tropical forests in Table 3A.1.14 of the 2003 Good Practice Guidelines for LULULCF Chapter 3.</i>"</p> <p>Table 3A.1.14 of the 2003 Good Practice Guidelines for LULULCF Chapter 3 provides a range of values for Tropical moist (Primary), 0.15 - 0.3 for drying seasons &lt;6 months, and 0.3 for drying seasons &gt;6 months. Verifiers agree that values for 'primary tropical moist forest' are appropriate as those are used for other parameters such as Pburnt[p,icl]. A single value from the 'primary tropical moist forest' forest type should be used based on evidence of drying seasons.</p>
<p><b>Round 1 NCR/CL/OFI</b></p>	<p>CL: Please reference the correct table in the PD for values of parameters fcl, icl, and z in sections 5.2 and 5.3 of the MIR.</p> <p>CL: Please provide a single value for CE[p,icl] (Average combustion efficiency of the carbon pool p in the forest class). The justification of this value should be from the 'primary tropical moist forest' forest type alone, and should be used based on evidence (provided to the verification team) of drying seasons in the project area.</p>
<p><b>Round 1 Response from Project Proponent (08 August 2018)</b></p>	<p>The correct table citations have been added to the Parameters section. fcl 5.3.16, icl 5.3.15, z 5.3.22. They need to be added to the new template. CE[p,icl] was set at beginning of project (see frequency of monitoring) and validated.</p>

<b>ESI Findings - Round 1</b>	References within the MIR for parameters fcl, icl, and z to tables in the PD were re-checked and could not be confirmed as correct. For the latest submission of the MIR sections were updated, these three parameters are now found in Sections 3.1.1 and 3.1.2.  The value for combustion efficiency was confirmed to be the value at validation, and is a parameter set at project start.
<b>Round 2 NCR/CL/OFI</b>	CL: Please reference the correct table in the PD for values of parameters fcl, icl, and z in the MIR.
<b>Round 2 Response from Project Proponent (17 September 2018)</b>	This has been updated in Section 3.1.1 and 3.1.2
<b>ESI Findings - Round 2</b>	Table references to PD values in the MIR are sufficient. The item is addressed.

<b>Item Number</b>	6
<b>VCS AFOLU Requirements June 21 2017, v3.6</b>	3.1.2 Where projects are located within a jurisdiction covered by a jurisdictional REDD+ program, project proponents shall follow the requirements in this document and the requirements related to nested projects set out in VCS document Jurisdictional and Nested REDD+ Requirements.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	KSWS REDD+ MIR Period 2 v1.0 (Section 1.1)
<b>ESI Findings - Initial (01 June 2018)</b>	The MIR (KSWS REDD+ MIR Period 2 v1.0, Section 1.1) indicates that In 2016, the KSWS was transferred to the Ministry of Environment (MoE) as part of a national jurisdictional transfer of all protected areas to MoE management.  It appears that Cambodia is still in the early stages of developing a jurisdictional REDD+ program and it is not clear if the project needs follow the VCS Requirements and the requirements related to nested projects set out in VCS document Jurisdictional and Nested REDD+.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify the stage of Cambodia's development of a jurisdictional REDD+ program. In the monitoring report, provide verifiable detail regarding the status of Cambodia's role in the jurisdictional REDD+ program. Please also clarify if the project needs follow the VCS Requirements and the requirements related to nested projects set out in VCS document Jurisdictional and Nested REDD+ Requirements.

<b>Round 1 Response from Project Proponent (08 August 2018)</b>	Cambodia has not established a jurisdictional program. Clarified in Section 2.5.6
<b>ESI Findings - Round 1</b>	Section 2.5.3 of the MIR was confirmed to now explain the current status of a national jurisdictional REDD+ program. At this time the VCS JNR rules are not applicable. This was further confirmed through a web search. The item is addressed.

<b>Item Number</b>	7
<b>VCS AFOLU Requirements 21 June 2017, v3.6</b>	3.1.3 Implementation of the project activities shall not lead to the violation of any applicable law, regardless of whether or not the law is enforced.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	KSWS REDD+ MIR Period 2 v1.0 (Section 3.1.1)
<b>ESI Findings - Initial (01 June 2018)</b>	<p>KSWS REDD+ MIR Period 2 v1.0 (Section 3.1.1) lists relevant local and national laws. This section does not summarize each laws potential constraint on project area management, and it is unclear how the project has been in compliance with each law during the monitoring period.</p> <p>Further, there are 3 additional laws listed in the MIR, that were not included in the Validated PD including:</p> <p>9. Sub-decree # 83 on Establishment of Keo Seima Wildlife Sanctuary (2016).</p> <p>4. Sor Chor Nor # On the approval to allow the Ministry of Environment to implement the Reducing Emissions Deforestation and Forest Degradation (REDD+) project in Seima Protected Forest and Biodiversity Area (Seima REDD+ Project) (2016)</p> <p>7. National REDD+ Strategy (2018).</p>
<b>Round 1 NCR/CL/OFI</b>	<p>CL: Please provide a summary of each law listed in section 3.1.1 of the MIR, describing potential constraints on project area management.</p> <p>Please also clarify how the project has been in compliance with each law during the monitoring period, and provide evidence where possible.</p>
<b>Round 1 Response from Project Proponent (08 August)</b>	This section edited to only include national and local laws and regulations that occurred since the last verification along with descriptions, program compliance, and evidence as required.

2018)	
<b>ESI Findings - Round 1</b>	Reporting the national, local and other relevant regulations/laws that have changed or otherwise eliminated is in line with the VCS MIR template. The sub-decrees and jurisdictional transfers described in Section 2.5.6 pertain to the change of project proponent which occurred prior to the end of the previous reporting period. A Gap Validation was approved by the previous verifier. The project's compliance with these laws is sufficiently described in the MIR. The item is addressed.

<b>Item Number</b>	8
<b>REDD Requirements Version 1.1</b>	If more deforestation in the leakage belt area is observed during project implementation, this will be considered as activity displacement leakage, and the decrease in carbon stocks and increase of GHG emissions (if emissions from forest burning are included in the baseline) must be subtracted in the calculation of the project's net anthropogenic GHG emissions reductions.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	05_2017_verification_calculations_v0.4.xlsx; Table 6.10 of MIR;
<b>ESI Findings - Initial (01 June 2018)</b>	<p>The "Ex-post CSC LK" tab of 05_2017_verification_calculations_v0.4.xlsx contains leakage calculations within the leakage belt. It is unclear to the verifiers why some calculations within this tab utilize hectareage for one year (ex: cell D17) while some use a sum of hectareage (ex: cell D34). Further, within this tab, years 7 and 8 are missing from the deadwood pool calculations.</p> <p>However, in the calculation of <math>\Delta\text{REDDt}</math> in the "Ex-post VCUs" tab of 05_2017_verification_calculations_v0.4.xlsx, it was noted that leakage (<math>\Delta\text{CLKt}</math>) was set to zero, indicating that <math>\Delta\text{CLKt}</math> was positive. However, <math>\Delta\text{CLKt}</math> was calculated as a negative number in the "Ex-post CSC LK" tab and as displayed in Table 6.10 of the MIR. Setting <math>\Delta\text{CLKt}</math> to zero inflates <math>\Delta\text{REDDt}</math>.</p> <p>It was also noted that Table 6.10 of the MIR was labeled incorrectly.</p>
<b>Round 1 NCR/CL/OFI</b>	<p>CL: Please clarify the noted inconsistency in the "Ex-post CSC LK" tab of 05_2017_verification_calculations_v0.4.xlsx</p> <p>CL: Please clarify why <math>\Delta\text{CLKt}</math> was assumed to be positive in the calculation of <math>\Delta\text{REDDt}</math> in the "Ex-post VCUs" tab of 05_2017_verification_calculations_v0.4.xlsx.</p> <p>CL: Please correct the title of Table 6.10 of the MIR.</p>

<p><b>Round 1 Response from Project Proponent (08 August 2018)</b></p>	<p>SUMs were erroneously introduced to the workbook during a copy and paste operation. This has been corrected. While the ex-post Leakage is positive, the difference between ex-ante and ex-post is negative. To calculate <math>\Delta\text{REDDt}</math> only leakage exceeding the baseline is to be deducted, thus these negative numbers were set to 0. Table 6.10 (now 3.2.3 corrected in the MIR).</p>
<p><b>ESI Findings - Round 1</b></p>	<p>The verifiers reviewed the updated carbon calculations within 08_2018_verification_calculations_v0.6.xlsx. It was noted that the hectare summation issues in the "Ex-post CSC LK" tab were corrected. This item is addressed.</p> <p>The verification team understands the calculation of <math>\Delta\text{REDDt}</math> to incorporate ex-post leakage. As the project calculated leakage for this reporting period ("Ex-post CSC LK" tab), it is unclear to the verification team why leakage is not present in calculation of VCUs through the calculation of <math>\Delta\text{REDDt}</math>. The verification team could not locate language in the VM0015 methodology detailing that only leakage exceeding the baseline is to be deducted from project ex-post VCU calculations.</p> <p>It was also noted that within the "Ex-post CSC LK" tab, year 8 is still missing from the deadwood pool calculations.</p> <p>Table 6.10 (now table 3.13) of the MIR has been correctly titled. This item is addressed. The contents of table 3.13 will be confirmed once the precedent calculations are confirmed.</p>
<p><b>Round 2 NCR/CL/OFI</b></p>	<p>CL: Please provide the language from the VM0015 methodology detailing that only leakage exceeding the baseline is to be deducted from project ex-post VCU calculations.</p> <p>CL: Please clarify why that within the "Ex-post CSC LK" tab, year 8 is missing from the deadwood pool calculations.</p>
<p><b>Round 2 Response from Project Proponent (17 September 2018)</b></p>	<p>There has been a versioning error with the calculation works supplied. Updated the calculation file to v2.0. Year 8 for deadwood pool is correctly included in 09_2018_verification_calculation_v2.0.xlsx.</p> <p>Section 1.2.2 paragraph 1 states "Deforestation above the baseline in the leakage belt area will be considered activity displacement leakage". From this it is assumed that leakage below the baseline will not be considered activity displacement leakage and therefore not deducted from project ex-post VCU calculations.</p>

<b>ESI Findings - Round 2</b>	<p>The verification team reviewed the newly provided carbon quantification spreadsheet (09_2018_verification_calculations_v2.0.xlsx) and noted that within the "Ex-post CSC LK" tab, year 8 is still missing from the deadwood pool calculations.</p> <p>The verification team reviewed the quoted language from the methodology and agree with the project's assessment. The PD was reviewed for validated leakage belt baseline values. It was noted that ex-post leakage was less than ex-ante leakage. It is therefore appropriate to leave leakage out of VCU calculations for the vintages in question. This item is addressed.</p>
<b>Round 3 NCR/CL/OFI</b>	CL: Please clarify why that within the "Ex-post CSC LK" tab, year 8 is missing from the deadwood pool calculations.
<b>Round 3 Response from Project Proponent (02 October 2018)</b>	This error was corrected in new version carbon calculation workbook 09_2018_verification_calculations_v3.0.xlsx and Table 3.20 of MIR. This did not impact final emission reduction calculations as the ex-post leakage remained less than the ex-ante baseline leakage.
<b>ESI Findings - Round 3</b>	<p>This issue was corrected in 09_2018_verification_calculations_v3.0.xlsx. This item is addressed. The values were not reported correctly in the MIR (ex: Table 3.20, Table 3.22)</p> <p>Further, the total net c stock change in all pools in the leakage area for years 7 and 8 were reported incorrectly in table 3.22.</p>
<b>Round 4 NCR/CL/OFI</b>	CL: Please ensure that all leakage values are correctly reported in the MIR, including the specific items mentioned in the finding.
<b>Round 4 Response from Project Proponent (05 October 2018)</b>	Table 3.20 and 3.22 have been updated with correct values. Further relevant information in response to findings 25 and 27.
<b>ESI Findings - Round 4</b>	Table 3.20 and 3.22 have been updated with correct values in the MIR. However, this is pending the finding regarding the calculation of leakage.

<b>Item Number</b>	9
<b>REDD Requirements Version 1.1</b>	Collect medium resolution spatial data <sup>13</sup> (from 10m x 10m up to a maximum of 100m x 100m resolution) from optical and non-optical sensor systems, such as (but not limited to) Landsat14, SPOT, ALOS, AVNIR2, ASTER, IRS sensor data) covering the past 10-15 years
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MIR Section 5.1.2.1

<b>ESI Findings - Initial (01 June 2018)</b>	Table 5.2 of the MIR describes Landsat 8 OLI sensor used for the second monitoring period. However, this data source information does not appear to be relevant for reporting this period as verifiers understand that Sentinel 2 sensor data was used for the LU/LC exercise.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify the correct LU/LC data information, updating reporting as needed.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	Clarified on 2 August 2018 discussion with VVB, MIR updated.
<b>ESI Findings - Round 1</b>	Through discussions with the proponent Landsat 8 sensor data for Feb. 2016 and Feb. 2018 was in fact used for the land cover classification. Sentinel2 sensor data is used for the accuracy assessment. The item is addressed.

<b>Item Number</b>	10
<b>REDD Requirements Version 1.1</b>	<u>Cloud and shadow removal</u> using additional sources of data (e.g. radar, aerial photographs, field- surveys).
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MIR Section 5.1.2
<b>ESI Findings - Initial (01 June 2018)</b>	Landsat 8 OLI sensor data was mentioned in MIR Section 5.1.2 although Sentinel imagery was clarified by the proponent as being used for the LU/LC this monitoring period. The PD mentions cloud specific classification but verifiers were unable to determine clouds/shadows were removed this period.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify whether the remote sensing data required cloud/shadow removal for the LU/LC change detection exercise this period. If so, please describe steps in the reporting documentation.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	Cloud removal was not required for 2018 monitoring data, MIR updated to clarify.
<b>ESI Findings - Round 1</b>	Verifiers independently confirmed Landsat 8 imagery dated 01 February 2018 contains very little clouds or shadows and meets this requirement.

<b>Item Number</b>	11
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<b>REDD Requirements Version 1.1</b>	<u>Radiometric corrections</u> may be necessary (depending on the change-detection technique used) to ensure that similar objects have the same spectral response in multi-temporal datasets
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MIR Section 5.1.2
<b>ESI Findings - Initial (01 June 2018)</b>	It is not clear whether radiometric and haze reduction were necessary pre-processing steps from documentation provided.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify whether radiometric and haze reduction were necessary pre-processing steps.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	Neither radiometric correction nor haze reduction required, MIR updated to clarify
<b>ESI Findings - Round 1</b>	Verifiers independently confirmed Landsat 8 imagery dated 01 February 2018 did not require radiometric corrections and meets this requirement.

<b>Item Number</b>	12
<b>REDD Requirements Version 1.1</b>	As several methods are available to derive LU/LC and LU/LC-change maps from multi-temporal data sets, the methodology does not prescribe any specific method. <b>As a general guidance:</b>
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	
<b>ESI Findings - Initial (01 June 2018)</b>	Section 5.1.2 of the MIR states that the same remote sensing methods as the previous monitoring period were conducted and the land-cover change Annex 4.5 of the PD is referenced. Descriptions of methods for this period are similar to the previous monitoring report. Based on the results of the LU/LC analysis materials provided verifiers assumed an automated classification was used. However, discussions with the proponent suggested this may not be the case as Sentinel 2 imagery was used for the primary LU/LC change detection. Therefore it is not completely clear whether the full processing steps (1-13) described in the MIR reflect the steps followed for this period. Further, the minimum mapping unit is not defined.

<b>Round 1 NCR/CL/OFI</b>	CL: Please address the findings and clarify whether the processing steps described in the MIR are reflective of the LU/LC analysis implemented for this period, updating reporting documentation as needed. Please also clarify the minimum mapping unit.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	Clarified on 2 August 2018 discussion with VVB, MIR updated.
<b>ESI Findings - Round 1</b>	This finding was discussed with the project proponent and methods for derivation of the land cover monitoring were performed as described in the revised MIR. No further action is needed. The item is addressed.

<b>Item Number</b>	13
<b>REDD Requirements Version 1.1</b>	The minimum classification accuracy of each class or category in the Land-Use and Land-Cover Map and Land-Use and Land-Cover Change Map, respectively, should be 80%. If the classification of a class or category is lower than 80%:
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	region_file_w84_48n.tif; LULUC_2015_2017.tif; full_set.txt;
<b>ESI Findings - Initial (01 June 2018)</b>	<p>Verifier reviewed the results of the accuracy assessment for the second monitoring period as applied to the reference file (project area and leakage belt). Several discrepancies and items of clarification were noted:</p> <ul style="list-style-type: none"> <li>a) Some accuracy assessment "map" points (LU/LC results) were found to not be in agreement with "LULUC_2015_2017.tif."</li> <li>b) Very few accuracy assessment points were found to fall within detected deforested areas</li> <li>c) MIR does not report the change categories or the results of the accuracy assessment, appears to report benchmark accuracy assessment results from 2010 map</li> <li>d) Omission/commission errors (producer/user) not reported in MIR</li> <li>e) If Sentinel 2 data was used for the primary LU/LC change analysis it is unclear if the same data source is appropriate for the accuracy assessment</li> <li>f) Site visit observations indicated the following discrepancy; 12°10'34.24"N, 106°57'45.64"E - cleared road construction area (classed open forest)</li> </ul>

<p><b>Round 1 NCR/CL/OFI</b></p>	<p>CL: a) Please explain the disagreement between the results of the LU/LC analysis and the accuracy assessment. b) Please clarify the appropriateness of few points falling in detecting deforestation classes. c) and d) Please report correct results of accuracy assessment in the MIR including errors of omission/commission. e) Please also clarify if the same data source was used for the primary LU/LC change analysis and the accuracy assessment, justifying the appropriateness if warranted. f) Please also explain the road construction LU/LC point as noted in the finding, revising results if warranted.</p>
<p><b>Round 1 Response from Project Proponent (08 August 2018)</b></p>	<p>a. After receiving the points in question and checking against LULUC_2015_2017.tif we do not reach the same conclusion as this finding. A document demonstrating the correct class assignment of these map points provided to the verifier.          B. Deforested areas represent 0.72% of the classified area within the Project Zone. The occurrence rate of sample points in these areas is consistent with this. However to further examine this I generated a sample set of points within the deforestation classed areas. Of 50 attempted 37 met minimum distance apart and distance to edge requirements. The 37 points were sent to the on-site GIS analyst for interpretation. This resulted in 35 out of 37 points correctly identified as deforestation, overall accuracy of 95% which is consistent with overall accuracy of strata classification reported in MIR. These results are available to VVB.          C.&amp;D. The correct matrix has been added along with Users/Producers accuracy          E. The LU/LC change analysis used Landsat 8 and the accuracy evaluated the LU/LC change analysis results against image interpreted points on higher resolution Sentinel 2 imagery.          F. This discrepancy has been confirmed as an error in the classification. Steps have been taken to ensure this area is correctly classified for subsequent verifications.</p>

<p><b>ESI Findings - Round 1</b></p>	<p>a) The disagreement of some points between the classification and accuracy assessment were found to be the result of a conversion error on the part of the verifier. The accuracy assessment results were confirmed to be reasonable through an independent check</p> <p>b) Verifiers agree that dispersion and occurrence rate of accuracy assessment points compared to classification area is roughly proportional. The additional deliberate deforestation classed accuracy points are in line with the overall classification accuracy.</p> <p>c and d) As a result of an adjustment to the accuracy assessment (Accuracy_Assessment_v3.xlsm) the error matrix Table 3.4 in the MIR is slightly incorrect and needs to be updated.</p> <p>e) This element was resolved through discussions with the proponent, no further action needed.</p> <p>f) As the road cleared area is approximately the size of the minimum mapping unit (5x5 pixels, 2.25ha) it can be considered at the next verification event. Verifiers are reasonably assured overall map classification accuracy meets the requirement.</p>
<p><b>Round 2 NCR/CL/OFI</b></p>	<p>CL: Please ensure the accuracy assessment error matrix is reported in line with the results worksheet as noted in the finding.</p>
<p><b>Round 2 Response from Project Proponent (17 September 2018)</b></p>	<p>There has been a versioning error with the calculation workbooks supplied, the updated workbook is Accuracy_Assessment_v4.xlsm. This workbook includes the inclusion of the Change Class as detailed in Table 3.4 MIR, .</p>
<p><b>ESI Findings - Round 2</b></p>	<p>Table 3.4 in the MIR is now reflective of the latest accuracy assessment worksheet. No further action is needed. The item is addressed.</p>

<p><b>Item Number</b></p>	<p>14</p>
<p><b>REDD Requirements Version 1.1</b></p>	<p>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.</p>
<p><b>Evidence Used to Assess (Location in PD/MR or</b></p>	<p>MIR Section 4.3.2</p>

<b>Supporting Documents)</b>	
<b>ESI Findings - Initial (01 June 2018)</b>	Section 4.3.2 of the MIR states 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 however it is not clear if this is activity displaced leakage. Preservation of the original leakage belt boundaries and accounting for all deforestation during monitoring is inherently conservative.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify whether the project has made any adjustments (LB boundaries or otherwise) as a result of ELC presence in the leakage belt.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	No additional ELCs established in the project zone during this verification period. ELCs established during the prior verification period (2012) resulted in an adjusted leakage belt still viable for the 2016-2017 verification.
<b>ESI Findings - Round 1</b>	The response from the proponent states that the leakage belt was not adjusted this period as no new ELCs were granted during the period. We have no evidence to the contrary. As it would be difficult to provide evidence of no additional concessions, and as the project proponent is a branch of the government, this finding is considered addressed.

<b>Item Number</b>	15
<b>REDD Requirements Version 1.1</b>	These are subject to monitoring and accounting, when significant. In this case, under the project scenario it will be necessary to monitor the variables of table 23 <b>Page 83</b> within the project area and to report the results in table 24. <b>Page 84</b>
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	KSWS REDD+ MIR Period 2 v1.0.asd (Section 5.1.2, Task 1.1.3); site visit observations; imagery review

<p><b>ESI Findings - Initial (01 June 2018)</b></p>	<p>Verifiers understand that fires may be a regular occurrence in understory of deciduous forests in project area. Further, fire appears to be a regular tool in clearing for agriculture during land conversion activities and was witnessed on-site. Deforestation for this monitoring period occurred at a similar incidence level as the previous period and emissions from fire were not accounted for at that period. Page 100 of the PD states that non-CO2 emissions from forest fires used to clear forests were included in the baseline however elsewhere in the PD it states that non-CO2 emissions from forest fires were excluded. Page 146 of the PD describes monitoring methods for non-CO2 emissions from forest fires including parameters for Table 23 (and Table 24 if significant) which were found to be absent from the current MR.</p> <p>Section 5.1.2 (Task 1.1.3) of the MIR states, "No significant deforestation from forest fires was observed during the verification period", however the verification team could find no evidence of a significance test using the most recent CDM-approved and VCS-endorsed version of the "Tool for testing significance of GHG emissions in A/R CDM project activities.</p> <p>Significance in VM0015 is assessed using the most recent CDM-approved and VCS-endorsed version of the "Tool for testing significance of GHG emissions in A/R CDM project activities. (see section, SUMMARY DESCRIPTION OF THE METHODOLOGY). If fire is considered significant additional reporting may be warranted following the template tables provided in VM0015 (e.g. Table 25.e).</p>
<p><b>Round 1 NCR/CL/OFI</b></p>	<p>CL: Please clarify whether non-CO2 emissions from forest fires were included in the validated baseline as noted in the finding.</p> <p>CL: Please follow Section 1.1.3 "Monitoring of non-CO2 emissions from forest fires" and provide evidence that the mandatory parameters were monitored.</p> <p>CL: Following the above clarification request, please provide evidence of a significance test on <b>non-CO2 emissions from forest fires</b> in the reporting period, using the most recent CDM-approved and VCS-endorsed version of the "Tool for testing significance of GHG emissions in A/R CDM project activities.</p>
<p><b>Round 1 Response from Project Proponent (08 August 2018)</b></p>	<p>non-CO2 emissions from forest fires were not included in the baseline</p> <p>non-CO2 emissions from forest fires have been added to the carbon calculation workbook. The MIR has also been updated to include the results of this calculation.</p> <p>Significance uses a threshold of 5%, non-CO2 emissions are well below this threshold therefore not significant. The MIR has been updated to demonstrate this.</p>

<b>ESI Findings - Round 1</b>	Verifiers confirm that non-CO2 emissions from forest fires were not included in the baseline. However, it does not appear that this requirement has been met as a demonstration of non-CO2 forest fire emission insignificance could not be found. The MIR contains limited support for forest fire non-CO2 emissions in Section 3.1.3.4. Verifiers were unable to locate the significance threshold analysis as mentioned in the response in the latest MIR or calculation file.
<b>Round 2 NCR/CL/OFI</b>	CL: Please follow Section 1.1.3 "Monitoring of non-CO2 emissions from forest fires" and provide ancillary information and documentary evidence that the mandatory parameters were monitored to support the claim that no significant non-CO2 emissions from forest fires have been emitted during the monitoring period. If warranted, please provide evidence of a significance test on non-CO2 emissions from forest fires as noted in the round 1 clarification request.
<b>Round 2 Response from Project Proponent (17 September 2018)</b>	There has been a versioning error with the calculation works supplied. Updated the calculation file to 09_2018_verification_calculation_v2.0.xlsx. This includes a green tab Ex-post Fire Non-CO2 which follows methodology equations 11,12, and 13 and Table 23, and 24.
<b>ESI Findings - Round 2</b>	Verifiers reviewed the non-CO2 emissions from forest fire calculations provided to address this requirement for monitoring for significance. Non-CO2 emissions from forest fires were found to be generally low as compared to other pools and emission sources. Although T-SIG was not applied here the sum of total changes in pools and increases in emissions ranked does not have non-CO2 emissions from forest fires exceed 5% to be rendered significant. The item is addressed.

<b>Item Number</b>	16
<b>REDD Requirements Version 1.1</b>	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:
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	05_2017_verification_calculations_v0.4.xlsx;
<b>ESI Findings - Initial (01 June 2018)</b>	The "Ex-post CSC PA" tab of 05_2017_verification_calculations_v0.4.xlsx contains leakage calculations within the leakage belt. It is unclear to the verifiers why some calculations within this tab utilize hectarage for one year (ex: cell D17) while some use a sum of hectarage (ex: cell D36).
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify the noted inconsistency in the "Ex-post CSC PA" tab of 05_2017_verification_calculations_v0.4.xlsx
<b>Round 1 Response from Project</b>	SUMs were erroneously introduced to the workbook during a copy and paste operation. This has been corrected.

<b>Proponent (08 August 2018)</b>	
<b>ESI Findings - Round 1</b>	The "Ex-post CSC PA" tab of 08_2018_verification_calculations_v0.6.xlsx contains leakage calculations within the leakage belt. It is unclear to the verifiers why some calculations within this tab utilize hectareage for one year (ex: cell D17) while some use a sum of hectareage (ex: cell D36).
<b>Round 2 NCR/CL/OFI</b>	CL: Please clarify the noted inconsistency in the "Ex-post CSC PA" tab of 08_2018_verification_calculations_v0.6.xlsx
<b>Round 2 Response from Project Proponent (17 September 2018)</b>	The below ground carbon pool continues emissions for a period of 10 years after deforestation, since the emission amount is the same annually it is captured by using cumulative deforested area. See F6 to F13 on 5.3 CSC Per Class (Step 6.12) tab
<b>ESI Findings - Round 2</b>	The verification team is reasonably assured that the cumulative for 10 years approach is acceptable, given that it was previously verified. This item is addressed.

<b>Item Number</b>	17
<b>REDD Requirements Version 1.1</b>	<b>Table 29 Page 92</b> Total <i>ex post</i> estimated actual net changes in carbon stocks and emissions of GHG gases in the project area
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MIR; PDD;
<b>ESI Findings - Initial (01 June 2018)</b>	Table 29 from VM0015 could not be located within the MIR.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify why table 29 from VM0015 is not utilized in the MIR.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	Emissions from non-CO2 sources not included in the baseline, therefore not required to include Table 29
<b>ESI Findings - Round 1</b>	Part 4.4 of the Project Description document includes Table 4.3. Within this table, non-CO2 sources are included in the project activity. Table 29 of VM0015 includes actual non-CO2 emissions. It is unclear to the verifiers why this table should not be included in the MIR, given that non-CO2 emissions are monitored as part of the project activities.
<b>Round 2 NCR/CL/OFI</b>	CL: Please clarify why table 29 from VM0015 is not utilized in the MIR. In particular, please clarify why project activity non-CO2 gasses should not be reported in Table 29 of VM0015.

<b>Round 2 Response from Project Proponent (17 September 2018)</b>	Table 29 is used to add planned deforestation emissions and removals, unplanned deforestation emissions, and non-CO2 GHG emissions. However the project does not include planned deforestation and non-CO2 GHG emissions are not significant, therefore Table 29 is not applicable. Hopefully with inclusion on non-CO2 emission calculations (from finding above) which demonstrate that non-CO2e emissions are not significant (below 5% significance threshold) makes this clear.
<b>ESI Findings - Round 2</b>	The applicable information required by Table 29 is included in project documentation and spreadsheets. This item is addressed.

<b>Item Number</b>	18
<b>REDD Requirements Version 1.1</b>	Table 30.b Ex post carbon stock change in leakage management areas. <b>Page 95</b>
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MIR;
<b>ESI Findings - Initial (01 June 2018)</b>	Table 30.b from VM0015 could not be located within the MIR.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify why table 30.b from VM0015 is not utilized within the MIR.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	The leakage management areas by definition are agricultural and not subject to carbon stock change monitoring. See Section 5.5.1.1 Step 8.1.1 of the PD. Therefore Table 30.b is not required
<b>ESI Findings - Round 1</b>	The validated PD states that Tables 30a-c are not required. This item is addressed.

<b>Item Number</b>	19
<b>REDD Requirements Version 1.1</b>	Table 30.c Ex post net carbon stock change in leakage management areas <b>Page 96</b>
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MIR;
<b>ESI Findings - Initial (01 June 2018)</b>	Table 30.c from VM0015 could not be located within the MIR.

<b>June 2018)</b>	
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify why table 30.c from VM0015 is not utilized within the MIR.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	The leakage management areas by definition are agricultural and not subject to carbon stock change monitoring. See Section 5.5.1.1 Step 8.1.1 of the PD. Therefore Table 31 is not required
<b>ESI Findings - Round 1</b>	The validated PD states that Tables 30a-c are not required. This item is addressed.

<b>Item Number</b>	20
<b>REDD Requirements Version 1.1</b>	Table 31 Ex post parameters for estimating GHG emissions from grazing activities <b>Page 97</b>
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MIR;
<b>ESI Findings - Initial (01 June 2018)</b>	Table 31 from VM0015 could not be located within the MIR.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify why table 31 from VM0015 is not utilized within the MIR.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	No grazing promotion within leakage management therefor no need to monitor CH2 and NO2. See Section 5.5.1.1 Step 8.1.2 of the PD. Therefore Table 31 is not required
<b>ESI Findings - Round 1</b>	The validated PD states that leakage management activities will not focus on the promotion of grazing animals. This item is addressed.

<b>Item Number</b>	21
<b>REDD Requirements Version 1.1</b>	Table 32 Ex post estimation of emissions from grazing animals in leakage management areas. <b>Page 98</b>
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MIR;

<b>ESI Findings - Initial (01 June 2018)</b>	Table 32 from VM0015 could not be located within the MIR.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify why table 32 from VM0015 is not utilized within the MIR.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	No grazing promotion within leakage management therefor no need to monitor CH2 and NO2. See Section 5.5.1.1 Step 8.1.2 of the PD. Therefore Table 32 is not required
<b>ESI Findings - Round 1</b>	The validated PD states that Tables 32-33 are not required. This item is addressed.

<b>Item Number</b>	22
<b>REDD Requirements Version 1.1</b>	Table 33 Ex post estimation of net carbon stock changes and GHG emissions from leakage prevention activities. <b>Page 99</b>
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MIR;
<b>ESI Findings - Initial (01 June 2018)</b>	Table 33 from VM0015 could not be located within the MIR.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify why table 33 from VM0015 is not utilized within the MIR.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	The leakage management activities do not result in emissions over baseline (See Table 5.5.1 of PD). Therefore Table 33 not required. Therefore Table 33 is not required
<b>ESI Findings - Round 1</b>	The validated PD states that Tables 32-33 are not required. This item is addressed.

<b>Item Number</b>	23
<b>REDD Requirements Version 1.1</b>	Activity data for the leakage belt area must be determined using the same methods applied to monitoring deforestation activity data (category I, table 37) in the project area. Monitoring of the categories II and III outside the project area is not required because no credits are claimed for avoided degradation under this methodology.
<b>Evidence Used to Assess (Location in</b>	MIR;

<b>PD/MR or Supporting Documents)</b>	
<b>ESI Findings - Initial (01 June 2018)</b>	Table 37 from VM0015 could not be located within the MIR.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify why table 37 from VM0015 is not utilized within the MIR.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	The Project only monitors ID I of Table 37 (detailed in Section 3.1.3.3) as there are no, for ID II, logging, fuel-wood collection or charcoal production over baseline, and , for ID III, carbon stock increases have been conservatively excluded from monitoring.
<b>ESI Findings - Round 1</b>	Section 3.1.3.3 of the MIR includes the necessary information from Table 37 of VM0015. This item is addressed. Information regarding ID I is assessed elsewhere.

<b>Item Number</b>	24
<b>REDD Requirements Version 1.1</b>	Table 21.c Ex post total net carbon stock changes in the leakage belt (when using method 1 based on activity data per class). <b>Page 79</b>
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MIR Table 6.6;
<b>ESI Findings - Initial (01 June 2018)</b>	MIR Table 6.6 contains the information utilized in Table 21.c from VM0015. Because the project utilized method 1, Table 21.c is utilized. However, per the overarching requirement, the result of the ex post estimations of carbon stock changes were not reported using this table format.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify why the result of the ex post estimations of carbon stock changes were not reported utilizing Table 21.c from VM0015.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	These tables are in the accompanying Ex-post CSC LK table of the carbon calculations workbook "08_2018_verification_calculations_v2.0.xlsx" and, as per precedent since PD validation and 1st verification, not included due to size of tables and formatting issues for inclusion in a print sized document.
<b>ESI Findings - Round 1</b>	The verification team is in agreement with the inclusion of table 21.c in an accompanying workbook to the MIR.  This table is pending the findings elsewhere pertaining to the "Ex-post CSC LK" tab of the carbon calculations workbook.
<b>Round 2 NCR/CL/OFI</b>	

<b>Round 2 Response from Project Proponent (17 September 2018)</b>	
<b>ESI Findings - Round 2</b>	This table is pending the findings elsewhere pertaining to the "Ex-post CSC LK" tab of the carbon calculations workbook.
<b>Round 3 NCR/CL/OFI</b>	
<b>Round 3 Response from Project Proponent (02 October 2018)</b>	
<b>ESI Findings - Round 3</b>	This item is addressed.

<b>Item Number</b>	25
<b>REDD Requiremen ts Version 1.1</b>	Leakage will be calculated as the difference between the ex ante and the ex post assessment. Report the results in table 21.d
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MIR;
<b>ESI Findings - Initial (01 June 2018)</b>	Table 21.d of VM0015 could not be located within the MIR.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify why Table 21.d from VM0015 is not utilized within the MIR.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	21.d has been added to MIR
<b>ESI Findings - Round 1</b>	The verification team could not locate Table 21.d in the MIR.
<b>Round 2 NCR/CL/OFI</b>	CL: Please clarify where Table 21.d of VM0015 is located within the MIR.
<b>Round 2 Response from Project Proponent (17</b>	This has been added as Table 3.20 of MIR

<b>September 2018)</b>	
<b>ESI Findings - Round 2</b>	Table 3.20 of the MIR does not appear to match Table 21.d on page 115 of the methodology. However, it is the verification team's opinion that the information is presented in table 3.20 of the MIR as required by Table 21.d of the methodology. The verification team was unable to locate the source of the values in the "Total baseline CO2 emissions" fields and in the "Ex-Post CO2 emissions" fields for vintages outside of this verification. The verification team reviewed the PD and the previous MIR from VCS's website, but could not locate the above fields' values.
<b>Round 3 NCR/CL/OFI</b>	CL: Please clarify the source of the "Total baseline CO2 emissions" fields for all vintages and in the "Ex-Post CO2 emissions" fields for vintages outside of this verification. Please provide verifiable and/or previously verified documentation to support the values.
<b>Round 3 Response from Project Proponent (02 October 2018)</b>	These values were verified in the previous monitoring report, MONIT_REP_1650_01JAN2010_31DEC2015.pdf and can be found in Table 6.4.1. Ex post net anthropogenic GHG emission reductions ( $\Delta$ REDDt) and Tradable VCUs on pg 96. <a href="https://www.vcsprojectdatabase.org/services/publicViewServices/downloadDocumentById/27567">https://www.vcsprojectdatabase.org/services/publicViewServices/downloadDocumentById/27567</a>
<b>ESI Findings - Round 3</b>	The verification team reviewed the previous monitoring report (MONIT_REP_1650_01JAN2010_31DEC2015.pdf, accessed from Verra's website), and noted that there are differences in Table 6.4.1 of the previous MIR and Table 3.20 of the current MIR.
<b>Round 4 NCR/CL/OFI</b>	CL: Please clarify the noted discrepancies between Table 6.4.1 of the previous MIR and Table 3.20 of the current MIR.
<b>Round 4 Response from Project Proponent (05 October 2018)</b>	While investigating the discrepancy we found that an edit to the carbon calculations workbook made in response to round 1 of finding 8 was done incorrectly thus creating the discrepancy between the Period 1 MIR and Period 2 MIR values. This edit was to remove the cumulative addition of deforested area activity data as applied to the below ground, and dead wood carbon pool emission factors. Below ground and dead wood both continue to emit CO2 for a period of 10 years (see 5.3 CSC Per Class (Step 6.12) after deforestation therefore emission calculations accrue cumulatively for each year. Correcting this results in numbers matching the previously verified MIR. 09-2018_verification_calculations_v3.1.xlsx and KWSW_REDD_MIR_Period_2_v3.1.docx are the corrected versions.
<b>ESI Findings - Round 4</b>	The verifiers reviewed the updated calculations file (09_2018_verification_calculations_v3.1.xlsx). The verification team noted that within the "Ex-post CSC LK" tab that the calculation of leakage had been updated to the previous methods. The verification team is reasonably assured that the leakage is cumulative in the post-deforestation zones up to and including 10 years. However, it is unclear why the post-deforestation zones tables utilize acreages from rows 6-13 in the "Ex-post Activity" tab. These rows for the Leakage Belt only account for one stratum.

<b>Round 5 NCR/CL/OFI</b>	CL: Please address the findings. While doing so, please clarify why the post-deforestation zones tables utilize acreages from rows 6-13 in the "Ex-post Activity" tab of 09_2018_verification_calculations_v3.1.xlsx.
<b>Round 5 Response from Project Proponent (14 October 2018)</b>	There are two defined Stratum, Stratum 1 which is areas impacted by smallholder farming and Stratum 2 which are impacted by Economic Land Concessions ELC. Stratum 2 was used in the reference region only. Neither the projected area or the leakage area contain Stratum 2 (these areas were excised as this is an Unplanned Avoided Deforestation project). The post deforestation state of mixed cropping is the same for open and closed forest thus the sum of both are used for calculation.
<b>ESI Findings - Round 5</b>	The verification team understands that the agent of deforestation for stratum 2 is different than stratum 1. Stratum 2 is therefore excluded from the leakage belt and project area, i.e. reference region only. This is reasonable and was confirmed in the PD. No further action is needed. The item is addressed.

<b>Item Number</b>	26
<b>REDD Requirements Version 1.1</b>	Table 35. Total ex post estimated leakage. <b>Page 101</b>
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MIR;
<b>ESI Findings - Initial (01 June 2018)</b>	Table 35 of VM0015 could not be located within the MIR.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify why Table 35 from VM0015 is not utilized within the MIR.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	Table 35 is intended to show the distribution of leakage types by source. This PD explores only two types of leakage only displaced deforestation and leakage prevention measures. As noted in the PD there are no activities in leakage prevention that cause increases in emission. The other two types grazing, and displaced forest fires are not applicable for this project. Therefore Table 35 is not required.
<b>ESI Findings - Round 1</b>	Verifiers agree that Table 35 is mostly not applicable to this project by virtue of including displaced deforestation (activity) and leakage prevention measures. This was confirmed through review of the validated PD Section 5.5. No further action is needed. The item is addressed.

<b>Item Number</b>	27
<b>REDD Requirements Version 1.1</b>	Table 36: Ex post estimated net anthropogenic GHG emission reductions and VCUs. <b>Page 104</b>

<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MIR Table 6.11;
<b>ESI Findings - Initial (01 June 2018)</b>	While a table is included in the MIR (MIR Table 6.11) that is similar to Table 36 of VM0015, the full Table 36 of VM0015 is not included in the MIR.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify why Table 36 from VM0015 is not utilized within the MIR.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	This is represented in Table 3.2.6 of MIR
<b>ESI Findings - Round 1</b>	The verification team could not locate Table 3.2.6 of the MIR.
<b>Round 2 NCR/CL/OFI</b>	CL: Please clarify the location of Table 3.2.6 of the MIR.
<b>Round 2 Response from Project Proponent (17 September 2018)</b>	Table 3.23, Section 3.2.4.2. Note the previous version did not include the last two columns for formatting reasons. These have been readded and font size reduced to accommodate.
<b>ESI Findings - Round 2</b>	<p>The verifiers reviewers table 3.23 of the MIR and noted that the table does not match the format of Table 36 of the methodology. It is unclear why headings are different. Further, the following issues were noted:</p> <ol style="list-style-type: none"> <li>1. <math>\Delta</math>CBSLPA at t=6 is incorrect.</li> <li>2. The verification team could not locate the source of the "Ex-post Leakage Carbon stock change" fields for the vintages of this monitoring period.</li> <li>3. The verification team could not locate the source of the <math>\Delta</math>REDD fields for all vintages.</li> <li>4. The verification team could not locate the source of the Buffer Credits for previous vintages.</li> <li>5. Cumulative VCUs for the vintages in this monitoring period are incorrect.</li> <li>6. VBC[t] is incorrect for the vintages in this monitoring period.</li> <li>7. VBC is incorrect for the vintages in this monitoring period.</li> </ol>
<b>Round 3 NCR/CL/OFI</b>	CL: Please address the findings. While doing so, please ensure that Table 36 of the methodology is included in the MIR and that all values are traceable, verifiable, and correct.

<p><b>Round 3 Response from Project Proponent (02 October 2018)</b></p>	<p>The error (copy paste mistake) at T=6 has been fixed in the updated MIR. The cumulative VCU error (legacy values) has been fixed. The errors (copy paste mistakes) for VBC have been corrected. Table 3.23 of MIR differs from Table 36 of the methodology in two ways: (1). As non-GHG emissions were determined insignificant the reporting of emissions is not necessary (EBBBSLPA, EBBPSPA, ELK) (2.) The methodology Table 36 example is for ex-ante predictions for PD. For the MIR ex-post values are used instead. The vintage values were verified in the previous monitoring report, MONIT_REP_1650_01JAN2010_31DEC2015.pdf and can be found in Table 6.4.1. Ex post net anthropogenic GHG emission reductions (<math>\Delta</math>REDDt) and Tradable VCUs on pg 96. <a href="https://www.vcsprojectdatabase.org/services/publicViewServices/downloadDocumentById/27567">https://www.vcsprojectdatabase.org/services/publicViewServices/downloadDocumentById/27567</a></p>
<p><b>ESI Findings - Round 3</b></p>	<p>The verification team reviewed the previous monitoring report (MONIT_REP_1650_01JAN2010_31DEC2015.pdf, accessed from Verra's website), and noted that there are differences in Table 6.4.1 of the previous MIR and Table 3.23 of the current MIR. Further, it was noted that the Ex-post leakage carbon stock change for years 7 and 8 are incorrect in Table 3.23, as is Ex-post net anthropogenic GHG emission reductions for years 7 and 8.</p>
<p><b>Round 4 NCR/CL/OFI</b></p>	<p>CL: Please clarify the noted discrepancies between Table 6.4.1 of the previous MIR and Table 3.23 of the current MIR as well as the noted calculated values for years 7 and 8.</p>
<p><b>Round 4 Response from Project Proponent (05 October 2018)</b></p>	<p>See response to 25</p>
<p><b>ESI Findings - Round 4</b></p>	<p>This finding is pending the request for leakage calculations. The verification team noted that cumulative VCUs tradable and annual Buffer credits are reported incorrectly in Table 3.23 of the MIR. (i.e. the table in the MIR and the table in the calculations file ex-post VCU's tab do not match).</p>
<p><b>Round 5 NCR/CL/OFI</b></p>	<p>CL: Please correctly report all values in the MIR, including cumulative VCUs tradable and annual Buffer credits in Table 3.23 of the MIR.</p>
<p><b>Round 5 Response from Project Proponent (14 October 2018)</b></p>	<p>Fixed the paste error. The Table in 0_2018_verification_calculations_v3.1.xlsx on the green Ex-post VCUs tab tradable (columns M,N) and Ex-post buffer (columns O,P) are now the same. Note the round down rule was not applied during the previous verification which has resulted in a single tonne difference (less) between this verification and last verification. As this omission is conservative I have left it.</p>
<p><b>ESI Findings - Round 5</b></p>	<p>Table 3.23 was confirmed corrected in the revised and newly submitted MIR v3.2. The VCUs and buffer amounts align between the calculations worksheet and reporting. The item is addressed.</p>

<p><b>Item Number</b></p>	<p>28</p>
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<b>REDD Requirements Version 1.1</b>	<b>Note:</b> A map showing Cumulative Areas Credited within the project area shall be updated and presented to VCS verifiers at each verification event. The cumulative area cannot generate additional VCUs in future periods.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MIR Section 6.4
<b>ESI Findings - Initial (01 June 2018)</b>	Figure 6.1 of the MIR displays areas credited and deforested for the first and second monitoring periods. However the figure caption states Landsat 8 imagery which is missing and references an incorrect year.
<b>Round 1 NCR/CL/OFI</b>	CL: Please address the findings and include a appropriate map and caption to meet this requirement.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	This has been updated
<b>ESI Findings - Round 1</b>	Figure 3.9 in the MIR now satisfies this requirements. The item is addressed.

<b>Item Number</b>	29
<b>VCS AFOLU Non-Permanence Risk Tool, Version 3.3 19 Oct 2016</b>	Species planted (where applicable) associated with more than 25% of the stocks on which GHG credits have previously been issued are not native or proven to be adapted to the same or similar agro-ecological zone(s) in which the project is located.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	VCS Risk Tool KSWs 2017 update v1.0.xlsx VCS Non-Permanence Risk Report 2017 v1.doc
<b>ESI Findings - Initial (01 June 2018)</b>	Values of "not applicable" were entered in section 1 and throughout the risk report. Section 2.2.1 1) states, "Each project management risk factor set out in Table 1 shall be assessed. Where a risk factor does not apply to the project, the score shall be zero for such factor."  The project monitoring report does not indicate planting of any species. However, no justification or external evidence is provided in the risk analysis for this item though it is required for each risk score provided.

<b>Round 1 NCR/CL/OFI</b>	NCR: Please correct the MS Word version risk report for all items. Where a risk factor does not apply to the project, the score shall be zero for such factor. Additionally, please provide a justification for the selection for each of the values in the risk analysis, and supply evidence as needed to support justifications, including those where a value of zero is given.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	The Risk Tool was completely reassessed for these findings, both the reprot and the calculation tool have been updated and also include justifications added above each Risk Factor table.
<b>ESI Findings - Round 1</b>	"0"s were confirmed to have been placed in in risk ratings to replace "Not Applicable"s where relevant in the revised risk report. The species planted requirement is not applicable to this project. The item is addressed.

<b>Item Number</b>	30
<b>VCS AFOLU Non-Permanence Risk Tool, Version 3.3 19 Oct 2016</b>	Ongoing enforcement to prevent encroachment by outside actors is required to protect more than 50% of stocks on which GHG credits have previously been issued.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	VCS Risk Tool KSWs 2017 update v1.0.xlsx VCS Non-Permanence Risk Report 2017 v1.doc
<b>ESI Findings - Initial (01 June 2018)</b>	<p>Values of "not applicable" were entered in section 1 and throughout the risk report. Section 2.2.1 1) states, "Each project management risk factor set out in Table 1 shall be assessed. Where a risk factor does not apply to the project, the score shall be zero for such factor."</p> <p>This item appears to be applicable to the project as this REDD project faces risk from outside actors entering the project area for the purposes of illegal logging. This was confirmed during the site visit. However, no justification or external evidence is provided in the risk analysis for this item though it is required for each risk score provided.</p>
<b>Round 1 NCR/CL/OFI</b>	NCR: This item is applicable as the project faces risk from outside actors entering the project area for the purposes of illegal logging. Please insert an appropriate risk item b) of internal risk. Please also refer to or supply any evidence that supports the risk score given.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	This has been corrected
<b>ESI Findings - Round 1</b>	This criteria now has a score of "2" appropriately. No further action is needed. The item is addressed.

<b>Item Number</b>	31
<b>VCS AFOLU Non-Permanence Risk Tool, Version 3.3 19 Oct 2016</b>	Management team does not include individuals with significant experience in all skills necessary to successfully undertake all project activities (i.e., any area of required experience is not covered by at least one individual with at least 5 years experience in the area).
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	VCS Risk Tool KSWs 2017 update v1.0.xlsx VCS Non-Permanence Risk Report 2017 v1.doc
<b>ESI Findings - Initial (01 June 2018)</b>	Section 1.5 of the Validated PD shows the participating organizations have strong track records and a pool of suitably qualified staff. However, no justification or external evidence is provided in the risk analysis for this item though it is required for each risk score provided, or where the project proponent is electing not to apply a risk rating that would raise the score.
<b>Round 1 NCR/CL/OFI</b>	NCR: If electing not to apply this risk score, justification needs to be provided in this section as the risk report is a stand alone document.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	This has been corrected
<b>ESI Findings - Round 1</b>	While the Risk Report now provides a reference to sufficient evidence, VCS requires that the risk report be a stand alone document, so the narrative justification must be provided within the Risk Report.
<b>Round 2 NCR/CL/OFI</b>	CL: Please include justification if electing not to apply this risk score element.
<b>Round 2 Response from Project Proponent (17 September 2018)</b>	Justification text from PD has been added to Risk Report.
<b>ESI Findings - Round 2</b>	The narrative justification was confirmed added to Section 1 of the Risk Report. The item is addressed.
<b>Item Number</b>	32
<b>VCS AFOLU Non-Permanence Risk Tool, Version 3.3 19 Oct 2016</b>	Management team does not maintain a presence in the country or is located more than a day of travel from the project site, considering all parcels or polygons in the project area.

<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	VCS Risk Tool KSWs 2017 update v1.0.xlsx VCS Non-Permanence Risk Report 2017 v1.doc
<b>ESI Findings - Initial (01 June 2018)</b>	Applicable. 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. Table must be corrected to reflect this instead of the "not applicable" score that is currently given.
<b>Round 1 NCR/CL/OFI</b>	NCR: Please change the score in the risk report from "not applicable" to zero if appropriate. Please provide justification for either claiming the score of zero or two.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	This has been corrected
<b>ESI Findings - Round 1</b>	Appropriate justification has now been added stating "d. Management team are located either on-site or in Phnom Penh". Item closed.

<b>Item Number</b>	33
<b>VCS AFOLU Non-Permanence Risk Tool, Version 3.3 19 Oct 2016</b>	Mitigation: Management team includes individuals with significant experience in AFOLU project design and implementation, carbon accounting and reporting (e.g., individuals who have successfully managed projects through validation, verification and issuance of GHG credits) under the VCS Program or other approved GHG programs.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	VCS Risk Tool KSWs 2017 update v1.0.xlsx VCS Non-Permanence Risk Report 2017 v1.doc
<b>ESI Findings - Initial (01 June 2018)</b>	Applicable. <b><u>There were two versions of the project developers risk tool: a word version (VCS Non-Permanence Risk Report 2017 v1.doc) and an excel version (VCS Risk Tool KSWs 2017 update v1.0.xlsx). The two versions, however, do not match for several of the scores.</u></b> Please align these two versions, noting the word version is the required VCS template and must be the final version submitted separately from the Monitoring Report as it is a stand alone document.
<b>Round 1 NCR/CL/OFI</b>	NCR: Please align the two versions (Word and Excel) as their scores do not match for this item.  NCR: Please ensure the word version is the final document as it is the required VCS format.

<b>Round 1 Response from Project Proponent (08 August 2018)</b>	This has been corrected
<b>ESI Findings - Round 1</b>	Appropriate justification has now been added stating "e. WCS Cambodia have both a Senior Technical Advisor and a REDD+ Technical Advisor with extensive experience with REDD+ design, implementation, carbon accounting, reporting, validation, verification etc." Item closed.

<b>Item Number</b>	34
<b>VCS AFOLU Non-Permanence Risk Tool, Version 3.3 19 Oct 2016</b>	Project cash flow breakeven point is less than 4 years from the current risk assessment
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	VCS Risk Tool KSWs 2017 update v1.0.xlsx VCS Non-Permanence Risk Report 2017 v1.doc
<b>ESI Findings - Initial (01 June 2018)</b>	<p>Section 2.2.2.2 of the AFOLU Non-permanence Risk Tool states "The cash flow breakeven point is the year in which the cumulative cash flow is positive (ie, cash flow in exceeds cash flow out) and stays positive." In order to confirm that the project has appropriately assessed breakeven year, a full projection of costs and revenues for the project crediting period needs to be provided. No financial projections for the project crediting period were provided. This should include a projection of all costs (project management costs, periodic verification costs, credit registration fee's, etc.) and revenues (projected credit sales, projected price estimates and support, other project revenue streams if they exist, etc.)</p> <p>While two files ("Seima Expense and budget Jan-Dec'17" and "Seima expense and budget 2016.xls") were provided which appear to show 2017 and 2016 budget and expenditures, they do not show a breakdown of these items. Additionally, in "Seima Expense and budget Jan-Dec'17" the expenditures for all items (carbon and otherwise) exceeds the budget substantially. It is unclear if or how this impacts the breakeven point.</p> <p>It would be helpful to have a full walkthrough call or Skype of the flow of the files provided and of how the files provided address the requirements of the AFOLU Non-permanence Risk Tool.</p>

<b>Round 1 NCR/CL/OFI</b>	CL: Please provide a cash flow for the project over the entire crediting period so breakeven can be confirmed. Please see the findings for specifics. Please also note that the assumptions on revenue from both carbon and other commercial sources (e.g., timber) must be conservative and clearly document the source, pricing assumptions, frequency of verification and other relevant variables.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	A financial projection has been added to the Risk Report/Supporting Documents cloud folder.
<b>ESI Findings - Round 1</b>	<p>Cash flow break even is asserted as 5 years from the current risk assessment, which ensures the project takes a score of 1 for this criteria. The cash flow analysis considers the major sources of revenue and expenditures, but no support was provided to substantiate securement of funding for cash flow in, or cash flow out. Section 2.2.2 (2 - 5) of the Risk Tool v3.3 suggests documentation that may be submitted to satisfy this requirement.</p> <p>The next finding was lumped into this finding for ease of tracking due to their similarities. From the WCS audit statement it was unclear which components pertained to the carbon project.</p>
<b>Round 2 NCR/CL/OFI</b>	CL: Please provide evidence to support the major cash flow in and cash flow out elements used to derive the breakeven point. Please clarify the components within the WCS audit which pertain to the carbon project and contribute to meeting this requirement in response to this finding or via phone if preferred for confidentiality.
<b>Round 2 Response from Project Proponent (17 September 2018)</b>	Please see 9. Risk Report/Supporting Documents/Revenue Breakdown v1.2.xlsx
<b>ESI Findings - Round 2</b>	The Revenue Breakdown v1.2.xlsx and KSWs_financial_projections_v2.2.xlsx worksheets were reviewed in response to this finding. Verifiers confirmed that the score chosen is appropriate for breakeven point in addition to funding securement. Credit sales are expected to weigh heavily on the timing of breakeven. The item is addressed.

<b>Item Number</b>	35
<b>VCS AFOLU Non- Permanence Risk Tool, Version 3.3 19 Oct 2016</b>	Project has secured less than 15% of funding needed to cover the total cash out before the project reaches breakeven

<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	VCS Risk Tool KSWs 2017 update v1.0.xlsx VCS Non-Permanence Risk Report 2017 v1.doc
<b>ESI Findings - Initial (01 June 2018)</b>	<p><b><u>There were two versions of the project developers risk tool: a word version (VCS Non-Permanence Risk Report 2017 v1.doc) and an excel version (VCS Risk Tool KSWs 2017 update v1.0.xlsx). The two versions, however, do not match for several of the scores.</u></b> Please align these two versions, noting the word version is the required VCS template and must be the final version submitted separately from the Monitoring Report as it is a stand alone document.</p> <p>An audited financial statement was provided for 2017 as required by the risk tool. While it does demonstrate that VCS is in good financial standing, as it is a detailed document, it is not clear if this was also intended to be provided as support for funding of the project, and if so, which item in this document shows the Keo Seima project funding.</p> <p>It would likely be helpful to have a walkthrough of the documents supporting that the project has sufficient cash flow.</p>
<b>Round 1 NCR/CL/OFI</b>	<p>NCR: Please align the two versions (Word and Excel) as their scores do not match for this item.</p> <p>CL: Please provide clarity where this document shows that funding has been secured.</p> <p>* Note closure of this item is also pending aspects of the other findings on breakeven point substantiation.</p>
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	A financial projection has been added to the Risk Report/Supporting Documents cloud folder.
<b>ESI Findings - Round 1</b>	Verifiers confirm receipt of the financial projection worksheet to satisfy this requirement. Verifiers' questions regarding the breakeven analysis and support documentation are now consolidated into a single finding. The item is addressed.

<b>Item Number</b>	36
<b>VCS AFOLU Non-Permanence Risk Tool, Version 3.3 19 Oct 2016</b>	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

<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	VCS Risk Tool KSWs 2017 update v1.0.xlsx VCS Non-Permanence Risk Report 2017 v1.doc
<b>ESI Findings - Initial (01 June 2018)</b>	<p>An assessment of the net impacts of the project on the social and economic well-being of the communities who derive livelihoods from the project area was not provided to support this score. See language below requiring this analysis.</p> <p><i>"Where the majority of baseline activities over the length of the project crediting period are subsistence-driven, an NPV analysis is not required, but an assessment of the net impacts of the project on the social and economic well-being of the communities who derive livelihoods from the project area (see Section 2.3.2 of the VCS AFOLU Non-Permanence Risk Tool) <b>shall be undertaken</b>. Based on this assessment, the project shall be assigned an opportunity cost score as set out in Table 3."</i></p> <p>Though the highest risk score was selected, VCS is clear that an assessment of the net impacts of the project on the social and economic well-being of the communities who derive livelihoods from the project area must be provided.</p>
<b>Round 1 NCR/CL/OFI</b>	CL: Please provide the verification team with the required assessment of the net impacts of the project on the social and economic well-being of the communities who derive livelihoods from the project area (see Section 2.3.2 of the VCS AFOLU Non-Permanence Risk Tool).
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	Please see KSWs_SIA_report_2017.pdf in Supporting Documents for MIR 2016-2017/4. Community/Social Impacts in the One Drive Shared Folder
<b>ESI Findings - Round 1</b>	The Social Impact Assessment provided in response to this finding was reviewed. The document examines key social indicators and suggests that baseline subsistence activities (unsustainable resource extraction) does not generate not positive community impacts. As the criteria chosen is the most aggressive and conservative no further action is needed. The item is addressed.
<b>Item Number</b>	37
<b>VCS AFOLU Non-Permanence Risk Tool, Version 3.3 19 Oct 2016</b>	In more than 5% of the project area, there exist disputes over land tenure or ownership

<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	VCS Risk Tool KSWS 2017 update v1.0.xlsx VCS Non-Permanence Risk Report 2017 v1.doc
<b>ESI Findings - Initial (01 June 2018)</b>	There were two versions of the project developers risk tool: a word version (VCS Non-Permanence Risk Report 2017 v1.doc) and an excel version (VCS Risk Tool KSWS 2017 update v1.0.xlsx). <b><u>The two versions, however, do not match for this requirement.</u></b> Please align these two versions, noting the word version is the required VCS template and must be the final version submitted separately from the Monitoring Report as it is a stand alone document.
<b>Round 1 NCR/CL/OFI</b>	NCR: Please align the two versions (Word and Excel) as their scores do not match for this item.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	This has been corrected
<b>ESI Findings - Round 1</b>	The correct score was reported in the Risk Report MS Word document. The item is addressed.

<b>Item Number</b>	38
<b>VCS AFOLU Non-Permanence Risk Tool, Version 3.3 19 Oct 2016</b>	There exist disputes over access/use rights (or overlapping rights)
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	VCS Risk Tool KSWS 2017 update v1.0.xlsx VCS Non-Permanence Risk Report 2017 v1.doc
<b>ESI Findings - Initial (01 June 2018)</b>	There were two versions of the project developers risk tool: a word version (VCS Non-Permanence Risk Report 2017 v1.doc) and an excel version (VCS Risk Tool KSWS 2017 update v1.0.xlsx). <b><u>The two versions, however, do not match for this requirement.</u></b> Please align these two versions, noting the word version is the required VCS template and must be the final version submitted separately from the Monitoring Report as it is a stand alone document.
<b>Round 1 NCR/CL/OFI</b>	NCR: Please align the two versions (Word and Excel) as their scores do not match for this item.

<b>Round 1 Response from Project Proponent (08 August 2018)</b>	This has been corrected
<b>ESI Findings - Round 1</b>	The correct score was reported in the Risk Report MS Word document. The item is addressed.

<b>Item Number</b>	39
<b>VCS AFOLU Non-Permanence Risk Tool, Version 3.3 19 Oct 2016</b>	Mitigation: Where disputes over land tenure, ownership or access/use rights exist, documented evidence is provided that projects have implemented activities to resolve the disputes or clarify overlapping claims
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	VCS Risk Tool KSWs 2017 update v1.0.xlsx VCS Non-Permanence Risk Report 2017 v1.doc
<b>ESI Findings - Initial (01 June 2018)</b>	There were two versions of the project developers risk tool: a word version (VCS Non-Permanence Risk Report 2017 v1.doc) and an excel version (VCS Risk Tool KSWs 2017 update v1.0.xlsx). <b><u>The two versions, however, do not match for this requirement.</u></b> Please align these two versions, noting the word version is the required VCS template and must be the final version submitted separately from the Monitoring Report as it is a stand alone document.
<b>Round 1 NCR/CL/OFI</b>	NCR: Please align the two versions (Word and Excel) as their scores do not match for this item.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	This has been corrected
<b>ESI Findings - Round 1</b>	The correct score was reported in the Risk Report MS Word document. The item is addressed.

<b>Item Number</b>	40
<b>VCS AFOLU Non-Permanence Risk Tool, Version 3.3 19 Oct 2016</b>	Mitigation: The project generates net positive impacts on the social and economic well-being of the local communities who derive livelihoods from the project area

<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	VCS Non-Permanence Risk Report v2.5 (section 2) KSWs REDD+ MIR Period 2 v1.0.asd (Section 2.3.1) PROJ_DESC_1650_29DEC2014.pdf (sections 2.7 and 3.7) Site visit observations
<b>ESI Findings - Initial (01 June 2018)</b>	Item Addressed: It appears that project generates net positive impacts on the social and economic well-being of the local communities who derive livelihoods from the project area, see Sections 2.7 and 3.7. of validated PD. Further, site visit observations confirm this claim and the project is CCB certified.  All benefits the project produces are summarized in Table 6.1. of the PD, however this table was incorrectly referenced in the Risk Report (section , as table 6.1.1
<b>Round 1 NCR/CL/OFI</b>	CL: Please correct the incorrect reference to table 6.1.1 in section 2 of the Risk Report.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	This has been corrected
<b>ESI Findings - Round 1</b>	The PD table reference was confirmed fixed appropriately. The item is addressed.

<b>Item Number</b>	41
<b>VCS AFOLU Non-Permanence Risk Tool, Version 3.3 19 Oct 2016</b>	Fire
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	VCS Non-Permanence Risk Report v2.5 (section 3)

<p><b>ESI Findings - Initial (01 June 2018)</b></p>	<p>It is unclear how insignificant/transient losses were confirmed through remote sensing analysis of historic imagery, and supported by letter from local expert. The documents "Large Area Deforestation from Uncontrolled Fires and Disease/Pest Outbreak, and "letter from a long-term local expert" were never supplied to the verification team. <u>Though fire risk is confirmed at validation, it must also be reconfirmed at each verification to capture instances in which on site conditions change.</u></p> <p>A mitigation score of 0 was incorrectly used.</p>
<p><b>Round 1 NCR/CL/OFI</b></p>	<p>CL: Please clarify how the risk score of 2 was determined for Fire given documents "Large Area Deforestation from Uncontrolled Fires and Disease/Pest Outbreak, and "letter from a long-term local expert".</p> <p>Please supply these two documents to the verification team.</p> <p>Please also input a correct mitigation score in the Risk Report.</p>
<p><b>Round 1 Response from Project Proponent (08 August 2018)</b></p>	<p>These documents have been added to Supporting Documents for MIR 2016-2017/Risk Report. The method was to visually inspect nature of deforestation and estimate size of burn impacts. No large area deforestation from forest fire or pest outbreak was observed around the sample points.</p>
<p><b>ESI Findings - Round 1</b></p>	<p>The project previously applied 2 for fire risk but is now reporting 1. Based on VCS feedback ESI understands that all fire risk (including anthropogenic) is to be accounted for in the natural risk section. Findings have been issued elsewhere in the review regarding forest fire monitored non-CO2 emissions significance. From the descriptions for fire risk in the Risk Report it is not clear whether the likelihood score of 1 is appropriate considering significance (Risk Tool Table 10) or whether anthropogenic fire was considered.</p>
<p><b>Round 2 NCR/CL/OFI</b></p>	<p>CL: Please further justify the appropriateness of the fire risk score, citing the significance chosen from the Risk Tool and considering anthropogenic fire risks.</p>
<p><b>Round 2 Response from Project Proponent (17 September 2018)</b></p>	<p>The risk of 1 was incorrectly selected. The correct selection is 2, anthropogenic fires are more frequent than every 10 years however result in insignificant loss. As raw percentage of forest, the less than 5% threshold, would be for events greater than 8,000 ha of forest (0.05* ~160,000 ha of forest in project area) lost to fire. Nothing approaching this threshold has been observed. This change in value has no impact on final volume of buffer credits. Risk Tool report has been updated.</p>
<p><b>ESI Findings - Round 2</b></p>	<p>The risk rating of 1 for fire was appropriately applied in the updated risk report. Verifiers agree that the threshold for a &gt;5% event is quite low. The likelihood and significance chosen scores are appropriate. The item is addressed.</p>
<p><b>Item Number</b></p>	<p>42</p>

<b>VCS AFOLU Non-Permanence Risk Tool, Version 3.3 19 Oct 2016</b>	Pest and Disease
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	VCS Non-Permanence Risk Report v2.5 (section 3)
<b>ESI Findings - Initial (01 June 2018)</b>	<p>It is unclear how insignificant/transient losses were confirmed through remote sensing analysis of historic imagery, and supported by letter from local expert. The documents "Large Area Deforestation from Uncontrolled Fires and Disease/Pest Outbreak, and "letter from a long-term local expert" were never supplied to the verification team. Though pest and disease risk is confirmed at validation, it must also be reconfirmed at each verification to capture instances in which on site conditions change.</p> <p>A mitigation score of 0 was incorrectly used.</p>
<b>Round 1 NCR/CL/OFI</b>	<p>CL: Please clarify how the risk score of 2 was determined for Pest and Disease given documents "Large Area Deforestation from Uncontrolled Fires and Disease/Pest Outbreak, and "letter from a long-term local expert".</p> <p>Please supply these two documents to the verification team.</p> <p>Please also input a correct mitigation score in the Risk Report.</p>
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	These documents have been added to Supporting Documents for MIR 2016-2017/Risk Report. The method was to visually inspect nature of deforestation and estimate size of burn impacts. No large area deforestation from forest fire or pest outbreak was observed around the sample points. While no areas were observed 2 was selected conservatively.
<b>ESI Findings - Round 1</b>	Verifiers agree that the risk of pest and disease outbreaks is relatively low as supported by the supplied document "Large Area Deforestation from Uncontrolled Fire and Disease.docx." Applying a value of 1 is inherently conservative. The item is addressed

<b>Item Number</b>	43
<b>VCS AFOLU Non-Permanence Risk Tool, Version 3.3 19 Oct 2016</b>	Extreme Weather – Changes in Weather Patterns

<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	<a href="http://preview.grid.unep.ch/index.php?preview=map&amp;lang=eng">http://preview.grid.unep.ch/index.php?preview=map&amp;lang=eng</a>
<b>ESI Findings - Initial (01 June 2018)</b>	How the risk score of 2 was determined given data from UNEP Global Risk Data Platform is unclear. Further, the UNEP Global Risk Data Platform shows significant risk of Landslides in and around the project area.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify how the risk score of 2 was determined given data from UNEP Global Risk Data Platform. It is unclear which likelihood, and which significance score were chosen to determine LS score given the referenced data source. It is also unclear how significant risk of Landslides was included in this determination.
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	As proving is a negative is very difficult, the value of 1 was conservatively selected as no events have been observed by WCS staff in the last 21 years and, as with the fire and pest remote sensing analysis, no loss of forest from extreme weather was observed in the larger reference area. With the exception of landslides, no high risk was detected in the sites provided and no historic "Past Events" recorded. However the risk associated with the site is clearly to do with the Annamites beyond the foothills of the project area. Within KSWS only 7% has greater than 10 degrees slope. Based on no known record nor predicted risk "Every 25 to less than 50 years" was conservatively selected as Likelihood and Minor (5% to less than 25% loss of carbon stocks) impact. A document with screenshots from risk site added to the shared cloud area (Risk Report)
<b>ESI Findings - Round 1</b>	Verifiers agree that the risk of extreme weather is relatively low based on knowledge of the project area region, inland location and topography. Small scale mudslides, flooding, drought and cyclones are unlikely to catastrophically impact carbon stocks. Applying a value of 1 is inherently conservative. The item is addressed

<b>Item Number</b>	44
<b>VCS AFOLU Non-Permanence Risk Tool, Version 3.3 19 Oct 2016</b>	OVERALL RISK Score
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	VCS Non-Permanence Risk Report v2.5 (section 4); VCS Non-Permanence Risk Report 2017 v2.2.doc
<b>ESI Findings - Initial (01 June 2018)</b>	This item remains pending all outstanding elements within the risk review.

<b>Round 1 NCR/CL/OFI</b>	
<b>Round 1 Response from Project Proponent (08 August 2018)</b>	
<b>ESI Findings - Round 1</b>	This item remains pending all outstanding elements within the risk review.
<b>Round 2 NCR/CL/OFI</b>	
<b>Round 2 Response from Project Proponent (17 September 2018)</b>	
<b>ESI Findings - Round 2</b>	This item remains pending all outstanding elements within the risk review.
<b>Round 3 NCR/CL/OFI</b>	
<b>Round 3 Response from Project Proponent (02 October 2018)</b>	
<b>ESI Findings - Round 3</b>	Verifiers noted that the standalone risk report document (v2.2); the overall risk rating by category and total reported in Section 4.1 does not match the risk scores in section 3.2.4.1 of the MIR.  The overall risk rating for Internal risk is incorrectly reported in v2.2 of the risk report document.
<b>Round 4 NCR/CL/OFI</b>	CL: Please clarify the discrepancies between the overall risk rating by category and total reported in Section 4.1 of the risk report and the risk scores in section 3.2.4.1 of the MIR. Please ensure that any changes to the standalone risk report document are reflective of all findings in the risk review including correct reporting of individual criteria risk scores.
<b>Round 4 Response from Project Proponent (05 October 2018)</b>	[Received via email from J. Silverman on 20181005]  Hi - the new versions risk report and MIR now match. I must have neglected to update the findings file.
<b>ESI Findings - Round 4</b>	The revised MIR and Risk Report were re-reviewed in response to the finding. The total natural risk in the Risk Report remains incorrect and natural risk reporting remains incorrect in the MIR.
<b>Round 5 NCR/CL/OFI</b>	CL: Please ensure reporting is correct for all risk scores in both the MIR and Risk Report.

<b>Round 5          Response          from Project          Proponent          (14 October          2018)</b>	The values of 4 for summed Natural Risk were updated to 5 in Risk Report and MIR
<b>ESI Findings          - Round 5</b>	This reporting was confirmed fixed. No further action is needed. The item is addressed.

## APPENDIX C: CCB NCRS/CLS/OFI SUMMARY

### Summary of Verification Findings to Date

	Criterion	Required/ Optional	Conformance Y/N N/A
	General Section		
G1	Project Goals, Design & Long-Term Viability	Required	Y
G2	-Without-Project Land Use Scenario & Additionality	Required	Y
G3	Stakeholder Engagement	Required	Y
G4	Management Capacity	Required	Y
G5	Legal Status and Property Rights	Required	Y
	Climate Section		
CL1	Without-Project Climate Scenario	Required	N/A
CL2	Net Positive Climate Impacts	Required	N/A
CL3	Offsite Climate Impacts	Required	N/A
CL4	Climate Impact Monitoring	Required	N/A
GL1	Climate Change Adaptation Benefits	Optional	N/A
	Community Section		
CM1	Without-Project Scenario for Communities	Required	Y
CM2	Net Positive Community Impacts	Required	Y
CM3	Offsite Stakeholder Impacts	Required	Y
CM4	Community Impact Monitoring	Required	Y
GL2	Exceptional Community Benefits	Optional	N/A
	Biodiversity Section		
B1	Without-Project Biodiversity Scenario	Required	Y
B2	Net Positive Biodiversity Impacts	Required	Y
B3	Offsite Biodiversity Impacts	Required	Y
B4	Biodiversity Impacts Monitoring	Required	Y
GL3	Exceptional Community Benefits	Optional	Y

### Verification Non-conformance/Clarification Request

#### GENERAL SECTION

##### 1.25 G1 Project Goals, Design and Long-term Viability

<p><b>Indicator G1.1</b> – Identify the primary Project Proponent which is responsible for the project's design and implementation and provide contact details.</p>	<p>Royal Government of Cambodia, National Council for Sustainable Development, Ministry of the Environment is the project proponent. Contact is H.E. Dr. Paris Chuop, Deputy Secretary-General/National REDD+ Focal Point. Phone: +855 23 213 908 Email: <a href="mailto:paris.nccg@gmail.com">paris.nccg@gmail.com</a> Address: Ministry of Environment, Royal Government of Cambodia #48 Samdach Preah Sihanouk Blvd.</p>
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	Phnom Penh12301, Cambodia
Evidence Used to Assess Conformance:	Title page, section 1.3 of the monitoring report.
Findings:	The project proponent and contact information was provided in the monitoring report. Item closed, 17 April 2018.
<b>Indicator G1.2</b> – Define the project's climate, community and biodiversity objectives.	<p>The climate objective is to reduce emissions due to unplanned deforestation in the project area (Avoided Unplanned Deforestation).</p> <p>Community objectives include developing alternative livelihoods/income generating activities that will reduce deforestation/poaching pressure, improving food security and incomes by providing ag extension training, strengthening tenure rights through communal land titling and preserving forest areas that provide basic needs and cultural identity to community members.</p> <p>Biodiversity objectives include the preservation of wildlife habitat, reducing poaching and habitat loss through patrols. Over 40 threatened and endangered species occur in the project zone.</p> <p>The objective of the Keo Seima Wildlife Sanctuary is similar, stated as, "A well-managed forest landscape that supports increasing wildlife populations and improving livelihoods for the people who currently live there".</p>
Evidence Used to Assess Conformance:	Title page, section 2.2 of the monitoring report, site visit.
Findings:	The project's objectives are clear: prevent deforestation, patrol and protect habitat, and reduce pressure on the forest resources by attempting to provide training and income opportunities. Additional detail on "sub-objectives" is provided. Item closed 17 April 2018.
<b>Indicator G1.3</b> – Provide the location (country, sub-national jurisdictions(s)) and a brief overview of the basic physical and social parameters of the project.	<p>The project is almost entirely within the Keo Seima Wildlife Sanctuary (KSWS), which is mostly in Mondulkiri Province and partly in Kratie Province of Cambodia. It abuts the Vietnamese border.</p> <p>Elevation ranges from 60 to 750 m above sea level. Northern and western parts of the project area are part of Cambodia's eastern plains. The eastern part of the project area is part of the Annamite range.</p> <p>Soils are briefly described, in terms of fertility.</p> <p>Tributaries of the Mekong drain most of the project area, while southernmost valleys drain to the Dong Nai river system in Vietnam. Many streams dry up during the dry season.</p> <p>Climate is tropical monsoonal, with the dry season stretching from November to April. Annual rainfall is 2200 – 2800 mm.</p>
Evidence Used to Assess Conformance:	Section 1.2 of the monitoring report.

Findings:	This indicator was addressed in the successfully validated Project Description document and does not need to be re-evaluated during verification. Item closed. 17 April 2018.
<b>Indicator G1.4</b> - Define the boundaries of the Project Area where project activities aim to generate net climate benefits and the Project Zone where project activities are implemented.	GIS files of the project area, strata and the project zone were provided to the auditors. A basic map of the project area appears in figure 1.1. A more detailed map of the project area, zone and leakage belt is provided in figure 4.1, including the location of villages/communities.
Evidence Used to Assess Conformance:	Sections 1.2 and 4.3 of the monitoring report, GIS files provided to the auditors.
Findings:	The project area was defined in the project description document. It has not changed. Therefore it does not need to be re-evaluated during this verification. Item closed. 17 April 2018
<b>Indicator G1.5</b> - Explain the process of stakeholder identification and analysis used to identify Communities, Community Groups and Other Stakeholders.	The process of identifying and analyzing stakeholders was described in section 2.7 of the PDD. Stakeholder analysis was based on Richards and Panfil, 2011.
Evidence Used to Assess Conformance:	Section 2.7 of the PDD.
Findings:	This indicator was closed during the successful project validation process and does not need to be re-examined during this verification event. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	
<b>Indicator G1.6</b> -List all Communities, Community Groups and Other Stakeholders identified using the process explained in G 1.5.	This indicator was successfully closed during project validation. A total of 20 local communities were identified in the validated PDD.
Evidence Used to Assess Conformance:	Sections 2.7. of the PDD and MR,
Findings:	This indicator was successfully closed during project validation. No additional communities have been added to the stakeholders list. This indicator is closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	
<b>Indicator G1.7</b> - Provide a map identifying the location of Communities and the boundaries of the Project Area(s), of the Project Zone, including any High Conservation Value areas	Maps of the community and community-related HCVs were not provided in the monitoring report.

(identified in CM1 and B1), and of additional areas that are predicted to be impacted by project activities identified in CL3, CM3 and B3.	
Evidence Used to Assess Conformance:	Figures 1.2.4 and 1.2.12 of the PDD.
Findings:	No maps indicating the locations of villages or HCVs were found in the monitoring report. However, the PDD includes the locations of the villages in figure 1.2.4 and the location of some of the HCVs in figure 1.2.12. Many of the HCVs are all over the project area, so this map appears to be sufficient. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G1.8</b> - Briefly describe each project activity and the expected outputs, outcomes and impacts of the activities identifying the causal relationships that explain how the activities will achieve the project's predicted climate, community and biodiversity benefits.	<p>The monitoring report goes into great detail regarding the activities and goals of the project. Activities are divided into "direct interventions" and "supporting interventions."</p> <p>Four broad direct interventions are described as:</p> <ol style="list-style-type: none"> <li>1. Development of key legal and planning documents needed for management.</li> <li>2. Reduce crime through direct law enforcement.</li> <li>3. Establish sustainable community use of land and natural resources; adapt to climate change.</li> <li>4. Support alternative livelihoods to reduce pressure on forest and adapt to climate change.</li> </ol> <p>Supporting interventions include:</p> <ol style="list-style-type: none"> <li>1. Effective monitoring</li> <li>2. Effective administration</li> <li>3. Fund raising.</li> </ol> <p>Since the threats to the project lands are unplanned deforestation from illegal logging and illegal land clearing, law enforcement efforts are intended to stop the illegal activities. Community-based land use planning and mapping provides a blueprint for communities to develop without damaging the forest resources. Alternative livelihoods provides alternative sources of income to stakeholders, so they do not have to resort to illegal activities to make a living.</p>
Evidence Used to Assess Conformance:	Section 2.2 of the MR.
Findings:	Project activities are all designed and developed to make the illegal activities that are resulting in forest degradation/loss more difficult and less necessary. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	

Evidence Used to Close NCR:	
Date Closed:	
<b>Indicator G1.9</b> - Define the project start date and lifetime, and GHG accounting period and biodiversity and community benefits assessment period if relevant, and explain and justify any differences between them. Define an implementation schedule, indicating key dates and milestones in the project's development.	<p>Project start date: 1 January 2010  Project lifetime: 1 January 2010 – 31 December 2069  GHG accounting period: 1 January 2010 – 31 December 2069.</p> <p>The PDD includes a complete work schedule in Annex 2.1.</p>
Evidence Used to Assess Conformance:	Sections 1.5 and 1.6 of the MR, Annex 2.1 of the PDD
Findings:	The project start date, project lifetime and the GHG accounting period are in agreement with each other. A work schedule was provided in the PDD. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	
<b>Indicator G1.10</b> - Identify likely natural and human-induced risks to the expected climate, community and biodiversity benefits during the project lifetime and outline measures needed and <i>taken</i> to mitigate these risks.	<p>This indicator is not formally addressed in any single place in the monitoring report. Risks to the climate and biodiversity benefits and measures taken to mitigate the risks are discussed in section 4.</p> <p>Risks to these benefits are the drivers of deforestation. Reducing those drivers reduces the risk to climate and biodiversity benefits.</p> <p>Factors that help drive deforestation include:</p> <ol style="list-style-type: none"> <li>1. Barriers to farm intensification or moving into alternative livelihoods.</li> <li>2. Weak governance/law enforcement.</li> <li>3. Limited ability of local stakeholders to prevent deforestation.</li> <li>4. Low perceived value of standing forests.</li> <li>5. Rising prices for agricultural products.</li> </ol> <p>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 (like REDD+).</p>
Evidence Used to Assess Conformance:	Sections 4.4.3, 4.4.4,
Findings:	Risks to climate and biodiversity benefits and associated mitigating activities are described in the MR, but risks to community-related benefits are either not discussed or were not found by the auditors.
Non-conformance Request (NCR):	Please address risks and mitigation that might threaten the community benefits of the project.
Date Issued:	31 May 2018
Project Proponent Response/Actions	The risks and mitigation will be included in the revised

and Date:	MIR.
Evidence Used to Close NCR:	Revised MIR
Date Closed:	

<b>Indicator G1.11</b> - Describe the measures needed and <i>taken</i> to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime.	<p>Several measures to extend project benefits beyond the project lifetime are discussed:</p> <ul style="list-style-type: none"> <li>• The legal basis for the project is strong, with governmental decrees used to establish it.</li> <li>• ICT titling will strengthen the claim communities have on their respective community lands.</li> <li>• Demarcation measures are being attempted to increase awareness.</li> <li>• Seima Trust Fund was established for long-term financing of the project.</li> <li>• Adaptive management techniques are used to respond to new/developing challenges.</li> <li>• Long-term engagement of communities, including outreach and consultation.</li> <li>• Agricultural extension courses.</li> <li>• Sustainable livelihood pilot projects.</li> <li>• Environmental awareness activities.</li> <li>• Attempts to draw the labor force from the local communities.</li> </ul>
Evidence Used to Assess Conformance:	Section 2.3 of the MR.
Findings:	Measures taken are reasonable, and include both legal aspects protecting the project lands, education and attempts to tie community success to project success. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G1.12</b> - Demonstrate that financial mechanisms adopted, including actual and projected revenues from GHG emissions reductions or removals and other sources, provide an adequate actual and projected flow of funds for project implementation and to achieve the project's climate, community and biodiversity benefits.	Pending analysis of VCS risk assessment of financial planning and mechanisms.
Evidence Used to Assess Conformance:	Insert Evidence Used
Findings:	Insert Findings
Non-conformance Request (NCR):	Insert NCR/CL
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G1.13</b> - Specify the Project Area(s) and Communities that may be included under the programmatic approach, <i>and identify any new Project Area(s) and Communities that have been included in the project since the last validation or verification against the CCB Standards.</i>	N/A
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G1.14</b> - Specify the eligibility criteria and process for project expansion under the programmatic approach <i>and demonstrate that these have been met for any new Project Areas and Communities that have been included in the project since the last validation or verification against the CCB Standards.</i>	N/A
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G1.15</b> - Establish scalability limits, if applicable, and describe measures needed and <i>taken</i> to address any risks to climate, community and biodiversity benefits if the project expands beyond those limits.	N/A
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

**1.26 G2 Without-project Land Use Scenario and Additionality**

<b>Indicator G2.1</b> - Describe the most likely land-use scenario within the Project	According to the validated Project Description, the most likely baseline scenario would be continued management
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Zone in the absence of the project, describing the range of potential land-use scenarios and the associated drivers of land use changes and justifying why the land-use scenario selected is most likely. It is allowable for different locations within the Project Zone to have different without-project land use scenarios.	as an area of production forest and continued and accelerating unplanned deforestation. Recent Landsat images demonstrate the trend. Most deforestation in the region is attributed to land clearance by small holder farmers.
Evidence Used to Assess Conformance:	Section 4.5.1 of the PD, section 4.4 of the MIR Period 2, v1.0.
Findings:	The baseline scenario was established during validation and does not need to be re-examined here. Item closed.

<b>Indicator G2.2</b> - Document that project benefits including climate, community and biodiversity benefits would not have occurred in the absence of the project, explaining how existing laws, regulations and governance arrangements, or lack of laws and regulations and their enforcement, would likely affect land use and justifying that the benefits being claimed by the project are truly 'additional' and would not have occurred without the project. Identify any distinct climate, community and biodiversity benefits intended for use as offsets and specify how additionality is established for each of these benefits.	Additionality was established in the PD using VT0001, the Tool for the Demonstration and Assessment of Additionality in VCS Agriculture, Forestry and Other land use (AFOLU) Project Activities.
Evidence Used to Assess Conformance:	Section 4.6 of the validated PD.
Findings:	Additionality was established when the project was validated. Item closed.

**1.27 G3 Stakeholder Engagement**

<b>Indicator G3.1</b> - Describe how full project documentation has been made accessible to Communities and Other Stakeholders, how summary project documentation (including how to access full documentation) has been actively disseminated to Communities in relevant local or regional languages, and how widely publicized information meetings have been held with Communities and Other Stakeholders.	<p>The MIR discusses how original project documentation was distributed and discussed, in May 2016 (during this monitoring period). The MIR goes on to describe regular ongoing meetings with a wide range of stakeholders, including Vietnamese counterparts, by both the MoE, WCS and other associated government agencies and NGOs,</p> <p>Table 2.16 includes a list of the meetings and consultations between the project and stakeholders that are conducted, and how often meetings are repeated.</p> <p>The MIR states that project documentation was distributed to local community leaders, and that project staff disseminated the information that independent auditors would be visiting.</p>
Evidence Used to Assess Conformance:	Sections 2.2.1.1, 2.7.1, 2.7.2, site visit.

Findings:	<p>From the site visit, it appeared that MIR summaries were discussed and distributed to community leaders, and that local offices had copies of the MIR. Many community members are illiterate, and depend on educated community leaders to disseminate such information to them. Some community members said they were briefed by their leaders on the project monitoring report. A small number said they were not.</p> <p>Virtually all community members and stakeholders were aware of the project. Many were aware auditors were visiting, though understanding the purpose for visiting was not always clear. A meeting of community leaders of Bunong communities was in progress during the site visit, which the auditors joined. No visual announcements of the site visit were seen during the visit.</p> <p>It was apparent that all stakeholders were aware of the project and its implications on their lives. While no posters or announcements of the auditor site visit were seen, little information of any kind seemed to be disseminated this way in the local communities, likely because it would be ineffective in an area with low literacy rates. The methods for dissemination of project information, especially to local communities, appears to be effective. Item closed.</p>
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G3.2</b> - Explain how relevant and adequate information about potential costs, risks and benefits to Communities has been provided to them in a form they understand and in a timely manner prior to any decision they may be asked to make with respect to participation in the project.	The MIR describes the consultation process with communities, done on an ongoing basis. It also reiterates part of section 2.7.4 of the validated PD.
Evidence Used to Assess Conformance:	Section 2.7.4 of the PD, section 2.7.1 of the MIR, site visit.
Findings:	The project appears to have properly informed local communities of the pros and cons of the project and its effect on their lives, according to FPIC principles. The site visit indicated that people remain informed and aware of the project, its benefits and its requirements. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G3.3</b> - Describe the measures	The MIR states that community leaders are regularly
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<p>taken, and communications methods used, to explain to Communities and Other Stakeholders the process for validation and/or verification against the CCB Standards by an independent Auditor, providing them with timely information about the Auditor's site visit before the site visit occurs and facilitating direct and independent communication between them or their representatives and the Auditor.</p>	<p>updated through meetings, and further mentions meetings and methods of communicating with communities for the original validation/verification site visit, in 2014. It goes on to mention what occurred during the site visit, at that time.</p> <p>The MIR states that leaders and communities the auditors wanted to visit were notified a few days in advance of the visit.</p>
<p>Evidence Used to Assess Conformance:</p>	<p>Section 2.7.2 and 2.7.3 of the MIR, site visit.</p>
<p>Findings:</p>	<p>The site visit indicated that communities were aware of the project. The degree to which community members were updated on the auditors' site visit varied by community, but most seemed to know we were coming.</p> <p>Communications between the project and local communities largely depends on word-of-mouth. Community leaders are informed of project activities and events, as are community members directly affected by the project (participants of savings groups, community patrols, project-related employment, etc.). Other community members learn about the project through meetings with local leaders and communications by individuals. The literacy rate appears to be low, and other methods of communications, like posted notices on community bulletin boards, do not seem to be used in the area.</p> <p>Section 2.7.3 states no comments were received, but the comment period did not begin until 25 April 2018.</p>
<p>Clarification Request (CL):</p>	<p>While some of the actions taken to disseminate the monitoring report likely apply to the current monitoring period verification site visit, it is not clear which actions took place for the previous verification site visit and which actions took place for the current one. Please clarify what was done to notify community members of this site visit.</p> <p>It is known that no comments were received through the CCBA website. Please clarify whether any comments were received in suggestion boxes auditors saw in some communities</p>
<p>Date Issued:</p>	<p>31 May 2018</p>
<p>Project Proponent Response/Actions and Date:</p>	<p>During the CCBA public comment period for the project verification in 2018, the project teams visited some villages to explain about CCBA and validation/verification process against the standard. Recently, before the CCBA MIR public comment period, the project teams visited the villages in the project area to distribute the MIR and explain the verification process to the local communities as well. The project hotline numbers were given in the report and also included on the grievance boxes which</p>

	placed in all the 20 villages. The project team visited all the villages to collect community comments on the MIR and there had not been any comments from the communities and stakeholders on the MIR so far.
Evidence Used to Close CL:	The text, provided above, was added to the MIR. No comments were received. Item closed.
Date Closed:	19 September 2018

<b>Indicator G3.4</b> - Describe how Communities including all the Community Groups and Other Stakeholders have influenced project design and <i>implementation</i> through Effective Consultation, particularly with a view to optimizing Community and Other Stakeholder benefits, respecting local customs, values and institutions and maintaining high conservation values. Project proponents must document consultations and indicate if and how the project design and implementation has been revised based on such input. A plan must be developed and <i>implemented</i> to continue communication and consultation between the project proponents and Communities, including all the Community Groups, and Other Stakeholders about the project and its impacts to facilitate adaptive management throughout the life of the project.	<p>The MIR 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.</p> <p>Community members are involved in land use planning for the ICT process, which is being facilitated by the project as a project activity.</p>
Evidence Used to Assess Conformance:	Sections 2.2, 2.7.1, site visit.
Findings:	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. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G3.5</b> - Demonstrate that all consultations and participatory processes have been undertaken directly with Communities and Other Stakeholders or through their legitimate	The MIR and PD describe the outreach, through visits, community meetings, meetings of community representatives and interest/activity groups. It lists the types of meetings held, the periodicity of the meetings and whether or not they are ongoing (most are).
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representatives, ensuring adequate levels of information sharing with the members of the groups.	The site visit interviews revealed that all community members are generally informed about the projects, its requirements and benefits. Most appeared to be up-to-date on project activities/events, like the auditors' site visit.
Evidence Used to Assess Conformance:	Sections 2.7.1 – 2.7.3, site visit interviews.
Findings:	Pertinent information about the project is being well-disseminated by the project, through traditional channels of communication. Adequate levels of information are reaching stakeholders. Item addressed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G3.6</b> - Describe the measures needed and <i>taken</i> to enable effective participation, as appropriate, of all Communities, including all the Community Groups, that want and need to be involved in project design, implementation, monitoring and evaluation throughout the project lifetime, and describe how they have been implemented in a culturally appropriate and gender sensitive manner.	<p>The communities of the project area are indigenous Bunong communities. Since 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.</p> <p>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.</p> <p>Most community leaders are men, though some community representatives are women. Women participated in community meetings/interview with the auditors.</p>
Evidence Used to Assess Conformance:	Section 2.7 of the MIR, site visit interviews.
Findings:	Project personnel are effectively communicating and getting the participation needed from local communities through appropriate ongoing meetings with individuals and local leaders. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G3.7</b> - Describe the measures needed and <i>taken</i> to ensure that the project proponent and all other entities involved in project design and implementation are not involved in or complicit in any form of discrimination or sexual harassment with respect to the project.	The MIR states, "Labor Law article 12, requires that all employers 'not discriminate against any individual based on race, religion, sex, age, wealth, disability, marital status, parental status, or sexual orientation.' This also makes sense for sound practical reasons, such as increasing the ability of the project workforce to communicate with local indigenous communities, and to deal with cultural gender barriers. Government staff assigned to the project is selected according to
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	government procedures and policies, which can be assumed to be compliant with the law.”  It goes on to explain WCS hiring procedures, which is geared toward recruiting under-represented groups.
Evidence Used to Assess Conformance:	Section 2.6.2 of the MIR.
Findings:	It is assumed the government, which is the project proponent, is following its own laws regarding employment. If WCS hiring procedures are followed, discrimination and harassment in hiring would likely be uncommon. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<p><b>Indicator G3.8</b> - Demonstrate that a clear grievance redress procedure has been formalized to address disputes with Communities and Other Stakeholders that may arise during project planning, implementation and evaluation with respect but not limited to, Free, Prior and Informed Consent, rights to lands, territories and resources, benefit sharing, and participation. The project shall include a process for receiving, hearing, responding to and attempting to resolve Grievances within a reasonable time period. The Feedback and Grievance Redress Procedure shall take into account traditional methods that Communities and Other Stakeholders use to resolve conflicts. The Feedback and Grievance Redress Procedure shall have three stages with reasonable time limits for each of the following stages.</p> <p>First, the Project Proponent shall attempt to amicably resolve all Grievances, and provide a written response to the Grievances in a manner that is culturally appropriate.</p> <p>Second, any Grievances that are not resolved by amicable negotiations shall be referred to mediation by a neutral third party.</p> <p>Third, any Grievances that are not resolved through mediation shall be</p>	<p>A grievance procedure was provided in the validated PD, following the 3-stage procedure guidelines provided in the CCB standard.</p> <p>From site visit interviews, it is clear that grievances rarely require redress through the formal procedure. Everyone knows 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.</p> <p>The grievance procedure is in the PD, however there is no indication it was publicized beyond that. It does not appear in the MIR or MIR summaries.</p>
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referred either to a) arbitration, to the extent allowed by the laws of the relevant jurisdiction or b) competent courts in the relevant jurisdiction, without prejudice to a party's ability to submit the Grievance to a competent supranational adjudicatory body, if any.  The Feedback and Grievance Redress Procedure must be publicized and accessible to Communities and Other Stakeholders. Grievances and project responses, including any redress, must be documented and made publicly available.	
Evidence Used to Assess Conformance:	Section 2.7.9 of the validated PD, section 2.7.4 of the MIR. Site visit
Findings:	From site visit interviews it appears that: <ol style="list-style-type: none"> <li>1. Everyone knows who to speak with if there is a problem regarding the project.</li> <li>2. People do not seem to be generally aware of any formal procedure for grievances.</li> </ol> <p>While the need for a formal grievance procedure may never arise for this project, it is required that the procedure by "publicized and accessible."</p>
Non-conformance Request (NCR):	Please take steps to publicize the formal grievance procedure.
Date Issued:	31 May 2018
Project Proponent Response/Actions and Date:	The grievance process shall progress through three stages until a resolution is achieved. The progression will be defined by referrals from Stage 1 to Stage 2 and from Stage 2 to Stage 3. These referrals will be made within established time limits. The project implementation team will take, in good faith, all reasonable steps to meet these limits. The grievance process was carefully explained to the community members and a simple poster in Khmer with photo was made and put in every village with the project hotline numbers so community members can contact for further clarification. The suggestion boxes with hotline numbers were placed in the 20 villages so the community members can write a complaint about the project and the project teams regularly check those boxes to collect any complaints submitted by the communities and no formal grievances registered to date.
Evidence Used to Close NCR:	The grievance procedure is in v2.9 of the MIR. An illustrated poster was also produced (fig. 2.3), and a picture of an example of a grievance box was provided in figure 2.4. Item closed.
Date Closed:	19 September 2018
<b>Indicator G3.9</b> - Describe measures needed and <i>taken</i> to provide orientation and training for the project's workers and relevant people from the Communities	The MIR states that MoE staff, WCS staff and community members employed or working in community patrols are trained according to the needs of their jobs. Tables 2.14 and 2.15 describe the types of training given to employees

with an objective of building locally useful skills and knowledge to increase local participation in project implementation. These capacity building efforts should target a wide range of people in the Communities, with special attention to women and vulnerable and/or marginalized people. Identify how training is passed on to new workers when there is staff turnover, so that local capacity will not be lost.	and community members.  Community trainings include agricultural training, training specific to ecotourist industry workers, GPS use, and training for community patrols.  The MIR also states that community members with recognized ability receive additional training to help advance their careers.  Training is implemented at hiring and on-the-job. All training is described as “ongoing.”
Evidence Used to Assess Conformance:	Section 2.6 of the MIR, site visit interviews.
Findings:	According to both the MIR and site visit interviews of community project employees and volunteers, training is given, including training in cooking/food prep and other ecotourism-related skills. For example, Bunong community members largely run and staff the Jahoo Gibbons Ecotourism camp.  Ag. Extension courses are given to interested farmers. Instruction in chicken and egg production has been provided. Some WCS employees are from the local communities. At least one local community member is a ranger with the MoE.  The project is building local capacity through ag and job skills training. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G3.10</b> - <i>Demonstrate</i> that people from the Communities are given an equal opportunity to fill all work positions (including management) if the job requirements are met. Explain how workers are selected for positions and where relevant, describe the measures needed and <i>taken</i> to ensure Community members, including women and vulnerable and/or marginalized people, are given a fair chance to fill positions for which they can be trained.	The MIR states that governmental positions are advertised and filled under Labor Law article 12, and it is assumed the government is following that law, barring discrimination.  The MIR describes how employment opportunities are advertised and filled through WCS. They are advertised at a national level. Special efforts are made to encourage application from women and minority groups. Locally, this includes via posters, announcements on local networks and word of mouth. Selection is conducted with an emphasis on increasing diversity in the workforce.  The MIR further explains, “Given the difficulty of recruiting directly to more senior positions by local recruitment due to the low levels of formal education prevalent in Mondulkiri, project staff are committed to identifying local people with advancement potential, taking them on as junior staff, interns or volunteers and investing in their professional development. These staff will be promoted to
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	more senior positions as their capacity grows. There is a high proportion of local staff in the more junior levels of the community team, wildlife monitoring team and ancillary support staff (cooks, drivers etc.).”
Evidence Used to Assess Conformance:	Section 2.6.2, site visit interviews with Jahoo Gibbons Camp staff.
Findings:	Several staff members from local Bunong communities were employed by the project as community liaisons and staffing the Gibbons Camp. The manager of the Gibbons Camp, from a local Bunong community, worked his way up from another position. He replaced the previous Bunong manager, who became a ranger. The kitchen staff was hired as described in the MIR. It appears the project is making an effort to hire local people with the intent of building personal capacity for advancement within project. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G3.11</b> - Submit a list of all relevant laws and regulations covering worker’s rights in the host country. Describe measures needed and <i>taken</i> to inform workers about their rights. Provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved.	<p>The MIR lists 9 national laws and 8 local laws and regulations that pertain to the project or project activities. The labor law of 1997 seems to be the only one that pertains to worker’s rights.</p> <p>The MIR states government employees are covered by the employment conditions of their host ministries, and the government is assumed to be following its laws. For NGO staff, the same laws apply, plus conditions of employment contracts. These policies meet or exceed requirements of the law. Staff receives their employment contracts, which outline employee rights. A policy manual is routinely distributed to new staff.</p>
Evidence Used to Assess Conformance:	Section 3.1.1 and 3.1.2 of the MIR.
Findings:	The auditors have no reason to believe employees are not informed of their rights. However, this indicator asks for a demonstration of how compliance is achieved, where relevant.
Clarification Request (CL):	See findings. Please provide a copy of the policy manual and/or an example employment contract, explaining or outlining the employee’s rights.
Date Issued:	31 May 2018
Project Proponent Response/Actions and Date:	Employees of government agencies including the MoE are covered by the employment conditions of their host Ministries. These can be assumed to adhere to all relevant government law and policies, and government employees are informed of their rights and responsibilities through routine government employment procedures. For NGO partner staff, employer-employee rights and responsibilities are governed by the Labor Law (1997), and additionally by their Employment Contracts, and by

	WCS's Internal Policies and Regulations. These policies meet or exceed the requirements of the laws and regulations covering workers' rights and conditions. All staff are given a copy of their employment contracts, which outline their rights, and refer to other relevant documents. A policy manual, working regulations and Site Operating Procedures are routinely distributed to new staff on commencement, and relevant documents are available in Khmer language at project offices.
Evidence Used to Close NCR:	A blank sample contract (file: Local Employee Contract_KH_EN.pdf), written in Khmer with the English translation, was provided to the auditors, along with a copy of the WCS Employment Policy Manual.  The contract outlines employee rights, and includes the clause, "Any terms and conditions of this contract shall be in accordance with the labor laws of the Kingdom of Cambodia and WCS Cambodia Program Employment Policy." Further, signing the agreement also is an acknowledgement that the employee policy manual was received. Item closed.
Date Closed:	19 September 2018

<b>Indicator G3.12</b> - Comprehensively assess situations and occupations that might arise through the implementation of the project and pose a substantial risk to worker safety. Describe measures needed and <i>taken</i> to inform workers of risks and to explain how to minimize such risks. Where worker safety cannot be guaranteed, project proponents must show how the risks are minimized using best work practices in line with the culture and customary practices of the communities.	The MIR includes jobs or roles of stakeholders and the training they receive. This includes safety training for community patrols.  The MIR states that a risk assessment has been conducted for the project and will be formally updated at appropriate intervals. Ecotourism and security workers/volunteers receive safety training on an annual or more frequent basis. Patrol teams are provided with first aid kits and safety information, and are trained and advised by law enforcement personnel.
Evidence Used to Assess Conformance:	Sections 2.6.1, 2.6.3 of the MIR, site visit interviews.
Findings:	Comprehensive assessments of risks to worker safety for various jobs and project tasks were done, though those risks are not described, summarized or reported.  Regular training is employed to inform workers of risks and ways to minimize them. Community patrols interviewed were very safety conscious.  No examples were provided regarding how best work practices are used to minimize risk. No mention as to how risks resulting in recent deaths of a ranger-led law enforcement patrols were handled.
Clarification Request (CL):	While the recent deaths of patrol members, in the line of duty, occurred after the end of this verification period, it would be beneficial to explain how the project changed or reinforced policies to address that unfortunate event, and reduce the risk that a similar event would happen in the

	future.
Date Issued:	31 May 2018
Project Proponent Response/Actions and Date:	The Law Enforcement Standard Operation Procedure (SOP) is being developed and it will be implemented for all the law enforcement activities in the project.
Evidence Used to Close CL:	As stated, the law enforcement SOP is under development. Since the incident in question did not occur during the monitoring period, a forward action request is issued so the SOP can be examined during the next verification audit. Item closed.
Date Closed:	19 September 2018
FORWARD ACTION REQUEST:	During the next verification, auditors should examine law enforcement SOPs that will make the recent tragedy a much less likely occurrence.

### 1.28 G4 Management Capacity

<b>Indicator G4.1</b> - Describe the project's governance structures, and roles and responsibilities of all the entities involved in project design and implementation. For projects using a programmatic approach, identify any new entities included in the project since the last validation or verification against the CCB Standards.	The project proponent is the Minister of the Environment, H. E. Dr. Paris Chuop. WCS Cambodia serves as the lead technical partner and coordinates other NGOs, led by Ken Sereneyrotha. The other NGO partners and contacts are provided.  Table 1.1 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.
Evidence Used to Assess Conformance:	Sections 1.3, 1.4 and 5.1.1.1 of the MIR. Interviews with key officials and players during the site visit
Findings:	The governing structure and the responsibilities of key individuals are described. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G4.2</b> - Document key technical skills required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills. Document the management team's expertise and prior experience implementing land management and carbon projects at the scale of this project. If relevant experience is lacking, the proponents must either demonstrate how other organizations are partnered with to support the project or have a recruitment strategy to fill the gaps.	Technical skills required to implement the project are outlined and described, along with the tasks those skills are needed to address, are provided in table 1.1 of the MIR.  These skills include management skills, understanding government processes, law enforcement skills, land law, skills needed for alternative livelihoods, scientific monitoring, GIS skills, administration and accounting.  Relevant tasks are covered by appropriate organizations with required skills
Evidence Used to Assess Conformance:	Section 1.4 of the MIR, interviews with WCS staff, law enforcement, government officials.

Findings:	WCS staff appears professional and competent. Government officials, at both national and provincial levels are well invested and well-versed in the project and project activities. Law enforcement officials are professional and different agencies are coordinated. Community patrols are supervised. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<p><b>Indicator G4.3</b> - Document the financial health of the implementing organization(s). Provide assurance that the Project Proponent and any of the other entities involved in project design and implementation are not involved in or are not complicit in any form of corruption such as bribery, embezzlement, fraud, favoritism, cronyism, nepotism, extortion, and collusion, and describe any measures needed <i>and taken</i> to be able to provide this assurance.</p>	<p>The monitoring report states that since the Ministry of the Environment is a legally constituted branch of the Royal Government of Cambodia, and therefore receives annual allocations from the national budget, it's basic financial health and stability are strong.</p> <p>The WCS is an internationally recognized non-profit, in operation since 1895. According to the MR, the audited financial statement from 2017 indicates operating revenues of \$320.7 million USD, which exceed expenditures by \$1.2 million USD.</p> <p>The monitoring report further states that total revenues for project implementation in 2016 was \$1,237,072 and \$1,054,895 for 2017.</p>
Evidence Used to Assess Conformance:	Sections 2.5.1 and 2.5.2 of the MR.
Findings:	<p>A consolidated audited financial statement was provided for WCS and it's subsidiaries.</p> <p>While the auditors assume both the government of Cambodia and WCS are financially sound, no budgetary requirements for the project were provided, nor the proportions of funding provided by the government of Cambodia, WCS and other donors.</p> <p>There was no response to the second part of this indicator, regarding corruption.</p>
Non-conformance Request (NCR):	<p>Please provide evidence that moneys allocated by the various funders of the project are sufficient to cover the budget.</p> <p>Please address the second part of this indicator, regarding corruption.</p>
Date Issued:	31 May 2018
Project Proponent Response/Actions and Date:	To strengthen good governance in Cambodia, fighting against corruption is one of the key programs to achieve social justice, sustainable and equitable social economic development in the country. The Royal Government of Cambodia (RGC) adopted an Anti-Corruption Law in 2010 and the Anti-Corruption Unit (ACU) was also established to fight against corruption for whole country. The ACU has set up a complaint mechanism for citizens to report

	<p>corruption cases through: Hotline: 1282; Email: acu@acu.gov.kh and complaint@acu.gov.kh; Website: www.acu.gov.kh.</p> <p>To enhance social accountability, reporting mechanisms have been put at provincial, district and commune offices in the country. Written complaints or requests can be anonymously put in locked boxes and they are designed to respond to the needs of citizens and ensure better governance, better public services, and more citizen participation. At the project level, all relevant stakeholders in the project can report or make a complaint on any corruption case via the hotline number (066 929 006) and project grievance boxes which is set to prevent and deal with possible corruption and misuse of funds. In the article 64 of the Protected Area Law, the Administration officer, an inspection or environment officer, for their negligence, carelessness or failure to abide by the order of the MoE, shall face administrative punishment or shall be prosecuted. The Administration officer, an inspection or environment officer, who conspires with the offender or facilitate the offences, shall receive the same punishment as the offender.</p> <p>WCS is committed to ensuring the integrity of financial information for the benefit of the Board of Trustees, Management, donors creditors, government agencies and other stakeholders WCS expects its Employees to maintain the highest standards of ethical conduct and to ensure their and WCS's compliance with all applicable laws and accounting principles. Any accounting fraud or other fiscal impropriety is strictly prohibited and will be subject to disciplinary action, including possibly termination.</p>
<p>Evidence Used to Close NCR:</p>	<p>According to the financial projections provided (file: SKWS_financial_projections_v2.2.xlsx), the project is expected to break even in 2022, at which point project expenditures will equal project revenues.</p> <p>The section discusses Cambodia's anti-corruption law, passed in 2010, which provides multiple opportunities for citizens to report corruption and misuse of funds.</p> <p>The MIR further states that WCS is "committed to ensuring the integrity of financial information for the benefit of the Board of Trustees, management, donors, creditors, government agencies, and other stakeholders. WCS expects its employees to maintain the highest standards of ethical conduct and to ensure their and WCS's compliance with all applicable laws and accounting principles. Any accounting fraud or other fiscal impropriety is strictly prohibited and will be subject to disciplinary action, including possibly termination." Specific examples of fiscal improprieties are included.</p>

	This is backed up by passages in the WCS employment policy manual on personal conduct.  Item closed.
Date Closed:	20 September 2018

**1.29 G5 Legal Status and Property Rights**

<b>Indicator G5.1</b> - Describe and map statutory and customary tenure/use/access/management rights to lands, territories and resources in the Project Zone including individual and collective rights and including overlapping or conflicting rights. If applicable, describe measures needed and <i>taken</i> by the project to help to secure statutory rights. <i>Demonstrate</i> that all Property Rights are recognized, respected, and supported.	The MIR states, “The KSWs REDD+ project is one of the country’s first REDD+ demonstration projects and is specifically listed as such in Cambodia’s National REDD+ Readiness Roadmap (RGC 2010). This constitutes evidence of approval from the formal authorities.” 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.
Evidence Used to Assess Conformance:	Sections G3.1.1, G3.2 and G3.7.1 of the MIR, site visit interviews.
Findings:	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. Item closed.

<b>Indicator G5.2</b> - <i>Demonstrate</i> with documented consultations and agreements that  a. the project will not encroach uninvited on private property, community property, or government property,  b. the Free, Prior, and Informed Consent <sup>5</sup> <i>has been obtained</i> of those whose property rights are affected by the project through a transparent, agreed process.  Free, Prior and Informed Consent is defined as: - ‘Free’ means no coercion, intimidation, manipulation, threat and bribery; - ‘Prior’ means sufficiently in	The project area is government property. The project proponent is the 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.
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<p>advance of any authorization or commencement of activities and respecting the time requirements of their decision-making processes;</p> <p>- <b>'Informed'</b> means that information is provided that covers (at least) the following aspects</p> <ol style="list-style-type: none"> <li>a. the nature, size, pace, reversibility and scope of any proposed project or activity;</li> <li>b. the reason/s or purpose of the project and/or activity;</li> <li>c. the duration of the above;</li> <li>d. the locality of areas that will be affected;</li> <li>e. a preliminary assessment of the likely economic, social, cultural and environmental impact, including potential risks and fair and equitable benefit sharing in a context that respects the precautionary principle;</li> <li>f. personnel likely to be involved in the execution of the proposed project (including Indigenous Peoples, private sector staff, research institutions, government employees, and others); and</li> <li>g. procedures that the project may entail; and</li> </ol> <p>- <b>'Consent'</b> means that there is the option of withholding consent and that the parties have reasonably understood it.</p> <p>- Collective rights holders must be able to participate through their own freely chosen representatives and customary or other institutions following a transparent process for obtaining their Free, Prior and Informed Consent that they have defined.</p> <p>c. appropriate restitution or compensation has been allocated to any parties whose lands have been or will be affected by the project.</p>	
<p>Evidence Used to Assess Conformance:</p>	<p>Sections 3.2 and 3.7.1 of the MR, site visit interviews.</p>
<p>Findings:</p>	<p>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</p>

	lives. Communities seemed to view the project favorably. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G5.3</b> - Demonstrate that project activities do not lead to involuntary removal or relocation of Property Rights Holders from their lands or territories, and does not force them to relocate activities important to their culture or livelihood. If any relocation of habitation or activities is undertaken within the terms of an agreement, the project proponents must <i>demonstrate</i> that the agreement was made with the Free, Prior, and Informed Consent of those concerned and includes provisions for just and fair compensation.	The monitoring report states, “The project anticipates no involuntary relocations of legitimate occupants of the area from either residential land or farmland. 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.
Evidence Used to Assess Conformance:	Section 3.7.2 of the monitoring report, site visit.
Findings:	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. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G5.4</b> - Identify any illegal activities that could affect the project’s climate, community or biodiversity impacts (e.g. illegal logging) taking place in the Project Zone and describe measures needed and <i>taken</i> to reduce these activities so that project benefits are not derived from illegal activities.	The illegal activities that would affect climate, biodiversity and community well-being 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.
Evidence Used to Assess Conformance:	Sections 2.2.1 and 3.8 of the monitoring report, site visit

	interviews with law enforcement and community patrols, seeing confiscated property taken from illegal loggers/land clearers.
Findings:	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 appears to be very good. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G5.5</b> -Identify any ongoing or unresolved conflicts or disputes over rights to lands, territories and resources and also any disputes that were resolved during the last twenty years where such records exist, or at least during the last ten years. If applicable, describe measures needed and <i>taken</i> to resolve conflicts or disputes. <i>Demonstrate</i> that no activity is undertaken by the project that could prejudice the outcome of an unresolved dispute relevant to the project over lands, territories and resources in the Project Zone.	<p>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.</p> <p>The conflicts that might arise are between the indigenous communities and outsiders seeking to clear forest land for agricultural development.</p> <p>No land use conflicts or disputes are reported between indigenous communities in the project zone.</p>
Evidence Used to Assess Conformance:	Section 3.2 of the MR, interviews during site visit.
Findings:	<p>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.</p> <p>Several community leaders mentioned there could be a need for more land, as community populations increased.</p> <p>Item closed. However, due to limited land availability in the project zone, project developers should pay special attention to whether land use needs of existing communities are growing, and adopting ways of reducing the need for additional land, through improved agricultural techniques, alternative livelihoods, etc.</p>
FORWARD ACTION ITEM:	<p>Future auditors should investigate whether land either titled to indigenous communities or recognized as belonging to indigenous communities is sufficient to sustain the communities.</p> <p>Future community needs may increase pressure on project area lands and reduce the current high levels of cooperation between communities and project developers,</p>

	unless alternative income opportunities and/or improved agricultural methods are successful.
Date Issued:	
Project Proponent Response/Actions and Date:	The household land mapping is being implemented to collect all individual household land plot so further land allocation could be made for those who do not have enough land to sustain their livelihood.
Evidence Used to Close NCR:	This indicator is closed. The forward action item is directed toward future verifiers.
Date Closed:	

<b>Indicator G5.6</b> - Submit a list of all national and local laws and regulations in the host country that are relevant to the project activities. Provide assurance that the project is complying with these and, where relevant, demonstrate how compliance is achieved.	<p>The monitoring report lists 9 national laws and 8 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.</p> <p>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.</p>
Evidence Used to Assess Conformance:	Sections 3.1.1, 3.1.2 of the MR, site visit interviews
Findings:	The auditors find no reason to believe the project is in violation of any local or national laws or regulations. Staff are aware of their rights. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G5.7</b> - Document that the project has approval from the appropriate authorities, including the established formal and/or traditional authorities customarily required by the Communities.	<p>The project is on 100% state owned land, under the territorial mandate of the Ministry of Agriculture, Forest and Fisheries.</p> <ul style="list-style-type: none"> <li>• It was designated a permanent forest estate in 1994.</li> <li>• It was made a conservation area in 2002 by government regulation.</li> <li>• Land status was changed to Protection Forest in 2009</li> </ul> <p>There are 20 communities in the project zone, all of whom are indigenous Bunong communities. Explicit written consent was obtained from all 20 communities. Discussions with the communities are active.</p>
Evidence Used to Assess Conformance:	Section 3.7.1 of the monitoring report, site visit observations and interviews.
Findings:	Community members and leaders appear to be well aware of the project's requirements and demands, and seem to be enthusiastic about the project. Communities visited had agreements with the project. Item closed.
Non-conformance Request (NCR):	
Date Issued:	

Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G5.8</b> - Demonstrate that the Project Proponent(s) has the unconditional, undisputed and unencumbered ability to claim that the project will or did generate or cause the project's climate, community and biodiversity benefits.	<p>The government of Cambodia owns project area lands, as demonstrated by laws and decrees from 1994, 2002 and 2009.</p> <p>When the land classification was changed from production forest to protection forest, in 2009, one of its listed objectives was specified as "Maintain carbon stored in vegetation in order to reduce carbon dioxide (CO<sub>2</sub>) emissions into the atmosphere."</p>
Evidence Used to Assess Conformance:	Section 3.2 of the monitoring report, discussions with government officials during the site visit.
Findings:	<p>While written in a somewhat convoluted manner, the CCB standard states that this indicator is asking whether the project developer has the right to claim any emissions reduction from the project area, rather than requesting a review of additionality.</p> <p>The project developer, the nation of Cambodia, clearly owns the land and has the right to claim any benefits derived from it. Item closed.</p>
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator G5.9</b> - Identify the tradable climate, community and biodiversity benefits of the project and specify how double counting is avoided, particularly for offsets sold on the voluntary market and generated in a country participating in a compliance mechanism.	<p>Tradable benefits include only the climate benefits (emissions reductions) claimed. The project only seeks registration under VCS and CCB.</p> <p>Cambodia is a non-Annex I signatory of the Kyoto protocol and does not have binding limits on CO<sub>2</sub> emissions</p>
Evidence Used to Assess Conformance:	Section 3.3 of the monitoring report.
Findings:	CO <sub>2</sub> emissions reductions are the only tradable benefits the project will produce. Registration through VCS should avoid double counting. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

**CLIMATE SECTION**

Per the *Rules for the Use of the CCB Standards* (December 2013), a Climate Section Waiver is applicable for projects using the *Third Edition*.

” The Climate section of the CCB Standards Third Edition is used to demonstrate a project’s net positive climate benefits and not for claiming greenhouse gas (GHG) emissions reductions and removals units for use as offsets. CL1-4 is not required for projects that have met the requirements of a Recognized GHG Program.

The Validation or Verification Report shall include evidence in the form of a positive validation or verification statement following the procedure of the Recognized GHG Program that the project meets the requirements of the Recognized GHG Program (for the appropriate time period, in the case of verification).

If a project is not successfully validated or verified to the standards of a recognized GHG program at the time of its validation or verification to the CCB Standards, it shall demonstrate conformance with the CCB Standards Climate Section CL1-4.

If a Project meets the requirements of a Recognized GHG Program resulting in a waiver of the Climate section of the CCB Standards, the project must be verified to the CCB Standards at the same time and every time that it is verified to the Recognized GHG Program.”

**1.30 CL1 Without-Project Climate Scenario**

<p><b>Indicator CL1.1</b> - Estimate the total GHG emissions inside the Project Area under the without-project land use scenario (described in G2) using an Approved or Defensible methodological approach. The timeframe for this analysis is the project GHG accounting period or the project lifetime. In the without-project scenario, it is allowable for the analysis to exclude GHG emissions from sources such as biomass burning, fossil fuel combustion, synthetic fertilizers, and to exclude non-CO2 GHG emissions such as CH4 and N2O gases, in cases where this can be justified as conservative. The analysis of GHG emissions or removals must include carbon pools expected to increase significantly under the without-project scenario.</p>	<p>A Climate Section Waiver is applicable as these elements are address via the VCS portion of the verification.</p>
<p>Evidence Used to Assess Conformance:</p>	
<p>Findings:</p>	
<p>Non-conformance Request (NCR):</p>	
<p>Date Issued:</p>	
<p>Project Proponent Response/Actions and Date:</p>	
<p>Evidence Used to Close NCR:</p>	
<p>Date Closed:</p>	

**1.31 CL2 Net Positive Climate Impacts**

<p><b>Indicator CL2.1</b> - Estimate the total</p>	<p>A Climate Section Waiver is applicable as these elements</p>
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GHG emissions expected from land use activities inside the project area under the with-project land use scenario using an Approved or Defensible methodological approach. This estimate must be based on clearly defined and defensible assumptions about changes in GHG emissions under the with-project scenario over the project lifetime or the project GHG accounting period. The GHG emissions estimate must include non CO2 emissions such as CH4 and N2O (in terms of CO2-equivalent), and GHG emissions from sources such as biomass burning, fossil fuel combustion, use of synthetic fertilizers and the decomposition of Nfixing species, etc., if those GHG emissions sources are cumulatively likely to account for more than 20% of the project's expected total GHG emissions in the with-project scenario.	are address via the VCS portion of the verification.
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator CL2.2</b> - Demonstrate that the net climate impact of the project is positive. The net climate impact of the project is the difference between the total GHG emissions or removals in the without-project scenario (including CO2 and non-CO2 GHG emissions) and total GHG emissions or removals resulting from project activities, minus any project-related negative offsite climate impacts ('Leakage' see CL3).	A Climate Section Waiver is applicable as these elements are address via the VCS portion of the verification.
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

**1.32 CL3 Offsite Climate Impacts ("Leakage")**

<b>Indicator CL3.1</b> - Determine the types of Leakage that are expected and estimate	A Climate Section Waiver is applicable as these elements are address via the VCS portion of the verification.
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offsite increases in GHG emissions due to project activities using an Approved or Defensible methodological approach. Where relevant, define and justify where Leakage is most likely to take place.	
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator CL3.2</b> - Describe the measures taken to mitigate Leakage.	A Climate Section Waiver is applicable as these elements are address via the VCS portion of the verification.
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator CL3.3</b> - Non-CO2 emissions must be included if they are likely to account for more than 20% of the total Leakage emissions (in terms of CO2-equivalent) following the procedures for including or excluding non-CO2 emissions described in CL 2.1.	A Climate Section Waiver is applicable as these elements are address via the VCS portion of the verification.
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

**1.33 CL4 Climate Impact Monitoring**

<b>Indicator CL4.1</b> - Develop and implement a plan for monitoring changes in relevant carbon pools, non-CO2 GHGs and emissions sources and leakage (as identified in CL1, CL2 and CL3) using an Approved or Defensible methodological approach and following the defined frequency of monitoring of defined parameters. Emissions sources to monitor must include any sources expected to	A Climate Section Waiver is applicable as these elements are address via the VCS portion of the verification.
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cumulatively contribute more than 20% of total GHG emissions in the with-project scenario (See footnote to CL2.1). Where the methodological approach used to estimate leakage under CL3 requires monitoring, this leakage must be monitored.	
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator CL4.2</b> - Disseminate the monitoring plan and any results of monitoring undertaken in accordance with the monitoring plan, ensuring that they are made publicly available on the internet and summaries are communicated to the Communities and Other Stakeholders through appropriate means.	A Climate Section Waiver is applicable as these elements are address via the VCS portion of the verification.
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

**1.34 GL1 Climate Change Adaptation Benefits**

<b>Indicator GL1.1</b> - Identify likely regional or sub-national climate change and climate variability scenarios and impacts, using available studies, and identify potential changes in the local land use scenario due to these climate change scenarios in the absence of the project.	N/A
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator GL1.2</b> - Demonstrate that current or anticipated climate changes	N/A
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are having or are likely to have an impact on the well-being of Communities and/or the conservation status of biodiversity in the Project Zone and surrounding regions.	
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator GL1.3</b> - Describe measures needed and <i>taken</i> to assist Communities and/or biodiversity to adapt to the probable impacts of climate change based on the causal model that explains how the project activities will achieve the project's predicted adaptation benefits.	N/A
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator GL1.4</b> - Include indicators for adaptation benefits for Communities and/or biodiversity in the monitoring plan. <i>Demonstrate</i> that the project activities assist Communities and/or biodiversity to adapt to the probable impacts of climate change. Assessment of impacts of project activities on Communities must include an evaluation of the impacts by the affected Communities.	N/A
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

**COMMUNITY SECTION**

**1.35 CM1 Without-Project Community Scenario**

<b>Indicator CM1.1</b> - Describe the Communities at the start of the project and significant community changes in the past, including well-being information, and any community characteristics. Describe the social, economic and cultural diversity within the Communities and the differences and interactions between the Community Groups.	<p>Communities were described in the validated project document as mostly part of the Bunong ethnic group, plus a few Stieng households, which are described as a similar group to the Bunong.</p> <p>The population of the area was relocated during the Khmer Rouge regime, in the 70s. Many returned when security improved, between 1979 and 1998.</p> <p>This indicator is not addressed in the current monitoring report.</p>
Evidence Used to Assess Conformance:	Section 1.2 of the PDD.
Findings:	This indicator was addressed during project validation and does not need to be re-examined here. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<p><b>Indicator CM1.2</b> - Evaluate whether the Project Zone includes any of the following High Conservation Values (HCVs) related to community well-being and describe the qualifying attributes for any identified HCVs:</p> <p>a. Areas that provide critical ecosystem services;</p> <p>b. Areas that are fundamental for the livelihoods of Communities; and</p> <p>c. Areas that are critical for the traditional cultural identity of Communities.</p> <p>Identify the areas that need to be managed to maintain or enhance the identified HCVs.</p>	<p>The project proponents identified all three HCVs related to community well-being in the project area. Fish derived from the forests rivers, and the ecosystem that supports a healthy river system are important ecosystem services. Livelihoods include the cash income from resin extraction, rattan, bamboo and wild honey.</p> <p>Culturally important areas have also been identified and mapped, and are important to the spiritual beliefs of the local communities.</p> <p>Activities currently being used by the project to enhance these HCVs include:</p> <ul style="list-style-type: none"> <li>• Increasing security and productivity by developing land use planning at the local level to encourage sustainable use.</li> <li>• Livelihood support activities to reduce pressure to harvest unsustainably.</li> <li>• Law enforcement patrols.</li> <li>• Appropriate zoning to allow NTFP collection.</li> <li>• Village level land-use planning to protect spiritual sites.</li> <li>• Appropriate zoning of KSWs that recognizes spiritual sites.</li> </ul>
Evidence Used to Assess Conformance:	Section 1.2.6 of the validated PDD, sections 2.4 and 5.1.4.4 of the monitoring report.
Findings:	Community-related HCVs were identified and validated previously. These HCVs are being monitored and good faith efforts are being made to protect or enhance them.

	Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<p><b>Indicator CM1.3</b> - Describe the expected changes in the well-being conditions and other characteristics of Communities under the without-project land use scenario, including the impact of likely changes on all ecosystem services in the Project Zone identified as important to Communities.</p>	<p>Section 6.1.1 of the validated PDD describes these predictions for the BAU scenario:</p> <ul style="list-style-type: none"> <li>• Average income likely to increase for most social groups, but the opposite is true for those depending on forest natural resources.</li> <li>• Water supply and quality will decline.</li> <li>• Some farmers will benefit from expansion of land holdings, but indigenous families may experience land alienation, reducing food security from subsistence.</li> <li>• Land fertility is likely to decline.</li> <li>• Indigenous communities will suffer from non-material aspects of well-being through the loss of cultural institutions and spiritually significant forest areas.</li> <li>• Low rate of literacy.</li> </ul> <p>These impacts are not re-addressed in the monitoring report.</p>
Evidence Used to Assess Conformance:	Section 6.1.1 of the PDD.
Findings:	This indicator was successfully addressed during project validation and does not need to be re-examined here. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

**1.36 CM2 Net Positive Community Impacts**

<p><b>Indicator CM2.1</b> - Use appropriate methodologies to assess the impacts, including predicted and actual, direct and indirect benefits, costs and risks, on each of the identified Community Groups (identified in G1.5) resulting from project activities under the with-project scenario. The assessment of impacts must include changes in well-being due to project activities and an evaluation of the impacts by the affected Community Groups. This assessment must be based on clearly defined and defensible assumptions about changes</p>	<p>Project actions and positive impacts were listed and described, to some extent, in table 7.1 of the monitoring report. The positive impacts listed for this verification period include:</p> <ul style="list-style-type: none"> <li>• Prevention of 25,000 ha of deforestation.</li> <li>• Prevention of several proposed extractive projects.</li> <li>• Ensuring long-term access for legitimate users.</li> <li>• Reduced impacts from industrial activities.</li> <li>• Reduced cross-border threats to natural resources.</li> <li>• Reduce threats through increased patrols.</li> </ul>
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in well-being of the Community Groups under the with-project scenario, including potential impacts of changes in all ecosystem services identified as important for the Communities (including water and soil resources), over the project lifetime.	<ul style="list-style-type: none"> <li>Increased coordination between provincial and national authorities to increase effectiveness of patrols and processing of criminal cases.</li> <li>Strengthened tenure security and land use rights.</li> <li>Collaboration between local communities and provincial and national governments.</li> <li>Increased sustainable income opportunities.</li> <li>Ag extension courses.</li> <li>Increased literacy.</li> </ul> <p>Project activities that contribute to these positive impacts are described and seem reasonable.</p>
Evidence Used to Assess Conformance:	Section 7.1 of the monitoring report, site visit observations and interviews.
Findings:	The 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. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator CM2.2</b> - Describe measures needed and <i>taken</i> to mitigate any negative well-being impacts on Community Groups and for maintenance or enhancement of the high conservation value attributes (identified in CM1.2) consistent with the precautionary principle.	The monitoring report does not address this indicator.
Evidence Used to Assess Conformance:	Section 7 of the monitoring report
Findings:	Negative impacts on community groups are not discussed at all in the monitoring report, possibly because none have been identified. However, this is not explained. The site visit did not reveal any obvious negative impacts on community groups, though concern was expressed regarding future land needs that may go beyond the lands being allocated for community use. (See indicator G5.5.)
Non-conformance Request (NCR):	Please address this indicator in the monitoring report. If no negative community impacts were identified, please say so and explain.
Date Issued:	31 May 2018
Project Proponent Response/Actions and Date:	Revised the MIR with VCS template and the indicators have been included in the Benefit Metric section
Evidence Used to Close NCR:	Section 4.1.2 of version 2.9 of the MIR consists of a table which lists each project action with comments on: <ul style="list-style-type: none"> <li>Expected positive impacts</li> <li>Potential negative impacts</li> <li>Most vulnerable groups who might be impacted</li> </ul>

	<ul style="list-style-type: none"> <li>Assessment and threat mitigation</li> </ul> <p>for each project action.</p> <p>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.</p> <p>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. Item closed.</p>
Date Closed:	20 September 2018
<b>Indicator CM2.3</b> - <i>Demonstrate</i> that the net well-being impacts of the project are positive for all identified Community Groups compared with their anticipated well-being conditions under the without-project land use scenario (described in CM1).	<p>This indicator was not addressed in the monitoring report. It is discussed in section 6 of the PDD. The PDD states that the results of a preliminary impact assessment, provided in Annex 5.1, will be used as a “tool to review the occurrence of negative impacts during project monitoring and adaptive management.”</p> <p>No review of potential negative impacts to community groups was found in the monitoring report.</p>
Evidence Used to Assess Conformance:	Section 7.1 and 7.2 of the monitoring report, section 6 and Annex 5.1 of the PDD.
Findings:	This indicator was not addressed in the monitoring report.
Non-conformance Request (NCR):	Please address this indicator by discussing the potential negative impacts identified in the PDD with observations and community monitoring during the monitoring period.
Date Issued:	31 May 2018
Project Proponent Response/Actions and Date:	Revised the MIR and the indicators have been included.
Evidence Used to Close NCR:	Section 4.1.3 of version 2.9 of the MIR includes a discussion on the results of the 2017 Basin Needs Survey. A table is also provided, showing the trend for each indicator. For most indicators, the trends are in a positive direction or neutral, especially in comparison with the expected ‘no project’ trends. Item closed.
Date Closed:	20 September 2018S
<b>Indicator CM2.4</b> - <i>Demonstrate</i> that no High Conservation Values (identified in CM1.4) are negatively affected by the project.	<p>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.</p> <p>Project activities are designed to protect these values through forest protection and land use planning. There is</p>

	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.
Evidence Used to Assess Conformance:	Sections 2.4, 5.1.4 of the MR.
Findings:	If the project is implemented as described, it is doubtful that project activities would negatively affect HCVs, since it's goals are to protect them. However, if unforeseen impacts occur, HCVs are monitored through remote sensing, through patrols, and also through direct consultation with communities.
Clarification Request (CL):	Please definitively state whether impacts to community-related HCVs were detected during the monitoring period.
Date Issued:	31 May 2018
Project Proponent Response/Actions and Date:	Section 4.1.4 of version 2.9 of the MIR states that no project related impacts to HCVs were detected during the monitoring period. Item closed.
Evidence Used to Close NCR:	20 September 2018
Date Closed:	

### 1.37 CM3 Other Stakeholder Impacts

<b>Indicator CM3.1</b> - Identify any potential positive and negative impacts that the project activities are likely to cause on the well-being of Other Stakeholders.	In the validated PDD, the only negative impacts to other stakeholders that were identified were those who would profit, legally or illegally, from harvesting timber or converting the land to agriculture or other uses.  The MR states, "No negative offsite stakeholder impacts from project activities observed."
Evidence Used to Assess Conformance:	Validated PDD and section 7.2 of the MR. Site visit impressions
Findings:	It is difficult to imagine any negative "other" stakeholder impacts of the project, except in cases where the stakeholders are interested in profiting from illegal activities. Other impacts would either be positive or neutral by leaving the forest basically intact. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator CM3.2</b> - Describe the measures needed <i>and taken</i> to mitigate the negative well-being impacts on Other Stakeholders.	No negative impacts on other stakeholders were observed.
Evidence Used to Assess Conformance:	Section 7.2 of the MR, the nature of the project.
Findings:	Leaving much of the land as it is should have little impact on other stakeholders, and negative impacts are difficult to envision. Indicator closed.
Non-conformance Request (NCR):	

Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator CM3.3</b> - Demonstrate that the project activities do not result in net negative impacts on the well-being of Other Stakeholders.	The monitoring report states, “No negative offsite stakeholder impacts from project activities observed.”  As stated previously, the only conceivable negative impacts would be on those seeking to profit through illegal logging or land clearing.
Evidence Used to Assess Conformance:	Section 7.2 of the MR, impressions during site visit.
Findings:	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. This indicator is closed
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

**1.38 CM4 Community Impact Monitoring**

<b>Indicator CM4.1</b> - Develop and implement a monitoring plan that identifies community variables to be monitored, Communities, Community Groups and Other Stakeholders to be monitored, the types of measurements, the sampling methods, and the frequency of monitoring and reporting. Monitoring variables must be directly linked to the project’s objectives for Communities and Community Groups and to predicted outputs, outcomes and impacts identified in the project’s causal model related to the well-being of Communities (described in G1.8). Monitoring must assess differentiated impacts, including and benefits, costs and risks, for each of the Community Groups and must include an evaluation by the affected Community Groups.	The monitoring plan was not provided in the monitoring report, however it is described in the validated PDD, and exists as separate documents (WCS 2013 and WCS 2015, not reviewed during this audit).  The MR states monitoring is “underway at the time of submission of the PD.”
Evidence Used to Assess Conformance:	Section 8.1.4.2 if the PDD. Section 5.1.4 of the MR.
Findings:	A monitoring plan was developed and previously validated. The monitoring plan does not have to be re-evaluated at this time.
Clarification Request (CL):	Please update the language in the monitoring report to show that the monitoring described to be underway at the

	time of submission of the PD is complete.
Date Issued:	31 May 2018
Project Proponent Response/Actions and Date:	The MIR was updated.
Evidence Used to Close NCR:	Section 4.3 of version 2.9 of the MIR was updated to indicate the preliminary monitoring was completed. Item closed.
Date Closed:	20 September 2018

<b>Indicator CM4.2</b> - Develop and implement a monitoring plan to assess the effectiveness of measures taken to maintain or enhance all identified High Conservation Values related to community well-being.	<p>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.</p> <p>Annual meetings will allow community representatives to comment on impacts.</p>
Evidence Used to Assess Conformance:	Section 8.1.4.5 of the PDD. Section 5.1.4.4 of the MR
Findings:	A monitoring plan for community-related HCVs appears to be in place. Indicator closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator CM4.3</b> - Disseminate the monitoring plan, and any results of monitoring undertaken in accordance with the monitoring plan, ensuring that they are made publicly available on the internet and summaries are communicated to the Communities and Other Stakeholders through appropriate means.	<p>The results of community monitoring are only broadly described in terms of community impacts.</p> <p>Household and demographic surveys were said to be done in 2017. The MR talks about tracking changes when comparison with the 2017 data is possible, yet no analysis of the data is described.</p> <p>Monitoring report summaries were distributed to communities and other stakeholders.</p>
Evidence Used to Assess Conformance:	Sections 5.1.4 and 7.1 of the MR, site visit interviews.
Findings:	The auditors did not receive any results or analysis of community monitoring, though some was scheduled to be done during 2017. Several reports from WCS NGO partners were received, though none of the reports that were translated to English were community monitoring reports.
Non-conformance Request (NCR):	Please provide the results of community monitoring analysis.
Date Issued:	31 May 2018
Project Proponent Response/Actions and Date:	The assessment report can be accessed via this link: <a href="https://goo.gl/wijrMR">https://goo.gl/wijrMR</a>
Evidence Used to Close NCR:	A document titled, "Social Impact Assessment for REDD+ in Keo Seima Wildlife Sanctuary" (file: KSW_SIA_report_2017.pdf) was provided to the auditors. 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. Item closed.
Date Closed:	20 September 2018

**1.39 GL2 Exceptional Community Benefits**

<p><b>Indicator GL2.1</b> - a. Demonstrate that Smallholders/Community Members or Communities either own or have management rights, statutory or customary, individually or collectively, to land in the Project Area. The Smallholders/Community Members or Communities have rights to claim that their activities will or did generate or cause the project's climate, community and biodiversity benefits. OR b. Demonstrate that the Project Zone is in a low human development country OR in an administrative area of a medium or high human development country in which at least 50% of the households within the Communities are below the national poverty line.</p>	N/A
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<p><b>Indicator GL2.2</b> - <i>Demonstrate</i> that the project generates short-term and long-term net positive well-being benefits for Smallholders/ Community Members. Include indicators of well-being impacts on Smallholder/Community Members in the monitoring plan. The assessment of impacts must include changes in well-being due to project activities and an evaluation of the impacts by the affected mallholders/Community Members.</p>	N/A
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<p><b>Indicator GL2.3</b> - Identify, through a participatory process, risks for the Smallholders/Community Members to participate in the project, including those related to tradeoffs with food security, land loss, loss of yields and short-term and long-term climate change adaptation. Explain how the project is designed to avoid such tradeoffs and the measures taken to manage the identified risks. Include indicators of risks for Smallholders/Community Members in the monitoring plan.</p>	<p>N/A</p>
<p>Evidence Used to Assess Conformance:</p>	
<p>Findings:</p>	
<p>Non-conformance Request (NCR):</p>	
<p>Date Issued:</p>	
<p>Project Proponent Response/Actions and Date:</p>	
<p>Evidence Used to Close NCR:</p>	
<p>Date Closed:</p>	
<p><b>Indicator GL2.4</b> - Identify Community Groups that are marginalized and/or vulnerable. <i>Demonstrate</i> that the project generates net positive impacts on the well-being of all identified marginalized and/or vulnerable Community Groups. <i>Demonstrate</i> that any barriers or risks that might prevent benefits going to marginalized and/or vulnerable Smallholder/Community Members have been identified and addressed. <i>Demonstrate</i> that measures are taken to identify any marginalized and/or vulnerable Smallholders/Community Members, whose well-being may be negatively affected by the project, and that measures are taken to avoid, or when unavoidable to mitigate, any such impacts.</p>	<p>N/A</p>
<p>Evidence Used to Assess Conformance:</p>	
<p>Findings:</p>	
<p>Non-conformance Request (NCR):</p>	
<p>Date Issued:</p>	
<p>Project Proponent Response/Actions and Date:</p>	
<p>Evidence Used to Close NCR:</p>	
<p>Date Closed:</p>	
<p><b>Indicator GL2.5</b> - Demonstrate that the project generates net positive impacts on</p>	<p>N/A</p>

the well-being of women and that women participate in or influence decision-making and include indicators of impacts on women in the monitoring plan.	
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator GL2.6</b> - Describe the design and implementation of a benefit sharing mechanism, demonstrating that Smallholders/Community Members have fully and effectively participated in defining the decision-making process and the distribution mechanism for benefit sharing; and demonstrating transparency, including on project funding and costs as well as on benefit distribution.	N/A
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator GL2.7</b> - Explain how relevant and adequate information about predicted and actual benefits, costs and risks has been communicated to Smallholders/Community Members and provide evidence that the information is understood.	N/A
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator GL2.8</b> - Describe the project's governance and implementation structures, and any relevant self-governance or other structures used for aggregation of Smallholders/Community	N/A
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members, and demonstrate that they enable full and effective participation of Smallholders/Community Members in project decision-making and implementation.	
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator GL2.9</b> - Demonstrate how the project is developing the capacity of Smallholders/Community Members, and relevant local organizations or institutions, to participate effectively and actively in project design, implementation and management.	N/A
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

## BIODIVERSITY SECTION

### 1.40 B1 Biodiversity Without-Project Scenario

<b>Indicator B1.1</b> - Describe biodiversity within the Project Zone at the start of the project and threats to that biodiversity, using appropriate methodologies.	The monitoring report does not describe biodiversity at the start of the project. The project area includes tropical evergreen forest as well as the deciduous forest of the eastern plains.  61 species of vertebrates of global conservation concern are known to exist in the project area, including deer and wild elephants. Eight endangered and critically endangered plant species are confirmed in the project zone.
Evidence Used to Assess Conformance:	Section 1.2 of the PDD.
Findings:	The project area was rich in biodiversity at the start of this project. This indicator was closed during project validation, and does not need to be re-examined at this time. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	

Date Closed:	
<p><b>Indicator B1.2</b> - Evaluate whether the Project Zone includes any of the following High Conservation Values (HCVs) related to biodiversity and describe the qualifying attributes for any identified HCVs:</p> <p>a. Globally, regionally or nationally significant concentrations of biodiversity values;</p> <ol style="list-style-type: none"> <li>i. protected areas<sup>108</sup></li> <li>ii. threatened species<sup>109</sup></li> <li>iii. endemic species<sup>110</sup></li> <li>iv. areas that support significant concentrations of a species during any time in their lifecycle.</li> </ol> <p>b. Globally, regionally or nationally significant large landscape-level areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance;</p> <p>c. Threatened or rare ecosystems.</p> <p>Identify the areas that need to be managed to maintain or enhance the identified HCVs.</p>	<p>The PDD states the biodiversity-related HCVs in the project area include HCV 1a – 1c. This is reiterated in the monitoring report.</p>
Evidence Used to Assess Conformance:	Sections 2.4 and 5.1.5.7 of the MR. Section 1.2.6 of the PDD. Site visit observations.
Findings:	The project area possesses HCVs 1a – 1c. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	
<p><b>Indicator B1.3</b> - Describe how the without-project land use scenario would affect biodiversity conditions in the Project Zone.</p>	<p>This is not discussed in the MR, but it is discussed in the PDD.</p> <p>The three threats facing biodiversity in the business-as-usual scenario are:</p> <ul style="list-style-type: none"> <li>• Hunting</li> <li>• Habitat loss through deforestation or other habitat conversion</li> <li>• Selective harvesting/overharvesting of plants.</li> </ul> <p>In the without-project scenario, hunting, especially the use of snares, would likely increase. Patrols have at least</p>

	<p>partially reduced hunting compared to the without-project scenario.</p> <p>Conversion of forest and other natural vegetation types to farmland or residential land completely eliminates the habitat required by the vulnerable species of the project zone. Conversion of lowland grasslands and wetlands to rice cultivation eliminates key habitat for several vulnerable species. In the without-project scenario, forest and habitat clearing would increase.</p> <p>Unmitigated selective logging and overharvesting can eliminate a species from the forest, directly. Also, harvesting can damage remaining habitat. Without patrols, selective logging would likely increase in the without-project scenario.</p>
Evidence Used to Assess Conformance:	Section 4.5.4 of the PDD.
Findings:	The without-project scenario is extensively discussed in the validated PDD and does not need to be re-examined during this verification event. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

**1.41 B2 Net Positive Biodiversity Impacts**

<p><b>Indicator B2.1</b> - Use appropriate methodologies to estimate changes in biodiversity, including assessment of predicted and actual, positive and negative, direct and indirect impacts, resulting from project activities under the with-project scenario in the Project Zone and over the project lifetime. This estimate must be based on clearly defined and defensible assumptions.</p>	<p>This is not directly addressed in the monitoring report. In the PDD, anticipated trends in wildlife populations are described.</p> <p>The comparison is between the current, largely intact ecosystem and a without-project scenario where habitat will gradually, or possibly even quickly, disappear.</p>
Evidence Used to Assess Conformance:	Section 7.1 of the PDD.
Findings:	This indicator was addressed during validation and does not need to be re-examined here. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<p><b>Indicator B2.2</b> - <i>Demonstrate</i> that the project's net impacts on biodiversity in the Project Zone are positive, compared with the biodiversity conditions under the without-project land use scenario</p>	<p>The project area is largely intact forest habitat that the endemic and endangered species rely upon for survival. The with-project scenario maintains that habitat. The without-project scenario results in the eventual elimination of that habitat.</p>
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(described in B1).	
Evidence Used to Assess Conformance:	The nature of the project and the nature of the habitat required by the species that live there.
Findings:	It is obvious 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. Indicator closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator B2.3</b> - Describe measures needed and <i>taken</i> to mitigate negative impacts on biodiversity and any measures needed and <i>taken</i> for maintenance or enhancement of the High Conservation Value attributes (identified in B1.2) consistent with the precautionary principle.	The monitoring report states that no negative impacts on biodiversity were observed.
Evidence Used to Assess Conformance:	Section 8.2 of the MR.
Findings:	No impacts were observed, nor are they likely. Indicator closed.
Non-conformance Request (NCR):	Insert NCR/CL
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator B2.4</b> - <i>Demonstrate</i> that no High Conservation Values (identified in B1.2) are 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. No negative impacts were observed.  Project activities are designed to protect and enhance HCVs
Evidence Used to Assess Conformance:	Section 5.1.5.7 and 7.2 of the MR.
Findings:	Project activities were designed to protect HCVs and monitoring did not detect negative impacts. Indicator closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator B2.5</b> - Identify all species used by the project and <i>show</i> that no known invasive species are introduced into any	Invasive species and non-native species are not discussed in the MR, likely because none are used (according to the validated PDD).
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area affected by the project and that the population of any invasive species does not increase as a result of the project.	
Evidence Used to Assess Conformance:	Section 7.1.3 of the PDD.
Findings:	No list of species used was included in the MR or PDD.
Clarification Request (CL):	Since project activities, including the use of different species, and can change through the project's lifetime, please include a list of all species used in project activities at this time, so this indicator can be checked through the project's lifetime.
Date Issued:	31 May 2018
Project Proponent Response/Actions and Date:	Tree planting activities have been implemented and only native species seedlings are used such as Beng ( <i>Azelia xylocarpa</i> )
Evidence Used to Close NCR:	Section 5.1.5 of version 2.9 of the MIR states that the project does not use non-native species, with the possible exception of ornamental species. Table 5.2 includes a list of the tree species that either have been used or might be used in future tree plantings. Each species was checked on the ISSG.org invasive species database (accessed 20 September 2018) and none are considered invasive in Cambodia. Item closed.
Date Closed:	20 September 2018

<b>Indicator B2.6</b> - Describe possible adverse effects of non-native species used by the project on the region's environment, including impacts on native species and disease introduction or facilitation. Justify any use of non-native species over native species.	This is not discussed in the MR, likely because no non-native species are used in project activities.
Evidence Used to Assess Conformance:	Section 7.1.3.2 of the PDD
Findings:	It is not known whether non-native species are in use in the project.
Clarification Request (CL):	Please respond to the clarification for indicator B2.5. If no non-native species are listed, this indicator will be closed. If non-native species are used, please respond to this indicator, as well.
Date Issued:	31 May 2018
Project Proponent Response/Actions and Date:	Non-native species have not been used in the project.
Evidence Used to Close NCR:	No non-native species are used in the project. All species listed in table 5.2 were checked against the IUCN Red List, to see where they were native. All were listed as native to Cambodia, with the exception of <i>Dalbergia oliveri</i> , which is listed as endangered and native to surrounding countries (Vietnam and Thailand). One species was not on the Red List, but is included on the Encyclopedia of Life website (EOL.org), which lists it as native to Cambodia. Item closed.
Date Closed:	20 September 2018

<b>Indicator B2.7-</b> <i>Guarantee</i> that no GMOs are used to generate GHG	This is not addressed in the monitoring report, but the validated PDD states that no GMOs are currently used in
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emissions reductions or removals.	the project zone and will not be used in project activities. The use of GMOs on farms in the project zone will not be supported by REDD funded ag assistance projects.
Evidence Used to Assess Conformance:	Section 7.1.3.3 of the PDD.
Findings:	Not addressed.
Clarification Request (CL):	Please reiterate the “no-GMO” guarantee in the monitoring report.
Date Issued:	31 May 2018
Project Proponent Response/Actions and Date:	GMO has not been used in the project.
Evidence Used to Close NCR:	Section 5.1.7 of version 2.9 of the MIR 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. Item closed.
Date Closed:	20 September 2018

<b>Indicator B2.8</b> - Describe the possible adverse effects of, and justify the use of, fertilizers, chemical pesticides, biological control agents and other inputs used for the project.	This is not addressed in the MR, but the validated PDD states that the project’s main strategy is to reduce forest loss and agricultural expansion, which reduces the need and use for chemical fertilizers, pesticides and biological control. Agricultural approaches used to increase economic alternatives to timber harvest include fertilizer and chemical pest deterrents.
Evidence Used to Assess Conformance:	Section 7.1.4.1 of the PDD.
Findings:	It does not appear that project activities employ the use of chemical fertilizers, pest control or biological control agents. However, this is not stated.
Clarification Request (CL):	Please reiterate in the monitoring report whether or not project activities employ the use of fertilizers, pesticides or biological control agents.
Date Issued:	31 May 2018
Project Proponent Response/Actions and Date:	The project activities have not employed any chemical fertilizers, pest control or biological control agents.
Evidence Used to Close NCR:	Section 5.1.8 of version 2.9 of the MIR states that most project activities act to reduce the need to use fertilizers and pesticides.  Some activities within the project area, supporting sustainable ag practices as alternative livelihoods include fertilizer and pesticide alternatives, such as compost and plant-based deterrents. Item closed.
Date Closed:	

<b>Indicator B2.9</b> - Describe the process for identifying, classifying and managing all waste products resulting from project activities.	This is not discussed in the monitoring report. However, the PDD states that no harmful wastes have resulted from project activities. Wastes so far have amounted to waste generated from typical human habitation and trash production from day to day living.  A process is described where wastes from any activity are identified upon inception and plans for waste disposal drawn up. The section further describes what has been done with wastes, thus far.
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Evidence Used to Assess Conformance:	Section 7.1.4.2 of the PDD
Findings:	While it is assumed there have been no new types of waste generated by the project or project activities since the PDD was published, this is not mentioned.
Clarification Request (CL):	Please address this indicator by supplying an update on whether any new project activities are resulting in the production of new waste products that must be dealt with.
Date Issued:	31 May 2018
Project Proponent Response/Actions and Date:	There have not been any new activities that generated new waste until now.
Evidence Used to Close NCR:	Section 5.1.9 of version 2.9 of the MIR states that no project activities have generated waste, outside of waste generated by typical human habitation and trash production from day to day living. Item closed.
Date Closed:	20 September 2018

### 1.42 B3 Offsite Biodiversity Impacts

<b>Indicator B3.1</b> - Identify potential negative impacts on biodiversity that the project activities are likely to cause outside the Project Zone.	The monitoring report states that no offsite biodiversity impacts were observed.  The PDD correctly states that the only negative offsite biodiversity impacts from a project of this nature would be from leakage.
Evidence Used to Assess Conformance:	Section 8.2 of the monitoring report, section 7.2 of the PDD.
Findings:	Potential negative impacts were discussed in the PDD. No actual impacts were observed during the monitoring period. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator B3.2</b> - Describe the measures needed and <i>taken</i> to mitigate these negative impacts on biodiversity outside the Project Zone.	N/A (See Indicator B3.1)
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator B3.3</b> - Evaluate unmitigated negative impacts on biodiversity outside the Project Zone and compare them with the project's biodiversity benefits within the Project Zone. Justify and	N/A (See indicator 3.1.)
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demonstrate that the net effect of the project on biodiversity is positive.	
Evidence Used to Assess Conformance:	Insert Evidence Used
Findings:	Insert Findings
Non-conformance Request (NCR):	Insert NCR/CL
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

**1.43 B4 Biodiversity Impact Monitoring**

<b>Indicator B4.1</b> - Develop and implement a monitoring plan that identifies biodiversity variables to be monitored, the areas to be monitored, the sampling methods, and the frequency of monitoring and reporting. Monitoring variables must be directly linked to the project's biodiversity objectives and to predicted activities, outcomes and impacts identified in the project's causal model related to biodiversity (described in G1.8).	A full monitoring plan was developed and implemented, and was reviewed and validated, previously. It is essentially repeated in Section 5.1.5 of the monitoring report.
Evidence Used to Assess Conformance:	Section 8.1.5 of the PDD, section 5.1.5 of the MR.
Findings:	The biodiversity monitoring plan was developed and implemented, as described in the validated PDD, and the plan itself does not have to be re-evaluated at this time. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator B4.2</b> - Develop and implement a monitoring plan to assess the effectiveness of measures taken to maintain or enhance all identified High Conservation Values related to globally, regionally or nationally significant Biodiversity (identified in B1.2) present in the Project Zone.	<p>Monitoring of biodiversity-related HCVs is covered by the overall monitoring plan.</p> <p>HCV1, significant concentrations of biodiversity values, is monitored via line transects, fecal DNA, capture-recapture and occupancy surveys.</p> <p>HCV2, Landscape level forests, is monitored through remote sensing.</p> <p>HCV3, threatened ecosystems, is monitoring through remote sensing and measurements of forest condition during reassessments of the project baseline.</p>
Evidence Used to Assess Conformance:	Section 8.1.5.10 of the PDD, section 5.1.5.7 of the MR.
Findings:	The monitoring plan for biodiversity-related HCVs was developed and published as part of the validated PDD, and it does not need to be re-examined during this

	verification event. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator B4.3</b> - Disseminate the monitoring plan and the results of monitoring, ensuring that they are made publicly available on the internet and summaries are communicated to the Communities and Other Stakeholders through appropriate means.	<p>Monthly reports are published. A report for February, 2018 was supplied to the auditors, in Khmer.</p> <p>The monitoring report includes a table of project actions and their associated positive impacts.</p> <p>The monitoring report also includes some results of transect surveys for 13 species, over several years' time. A number of the bar graphs show decreased encounters with the listed species, but no analysis of the data is provided.</p>
Evidence Used to Assess Conformance:	Sections 2.2.2.1 and 8.1 of the MR, monthly report file, titled, "Monthly Report in Feb 2018.pdf"
Findings:	The monitoring report summary is distributed to village leaders. The auditors were unable to translate the February, 2018 report. Very little biodiversity monitoring data for the verification period was found in project documentation.
Non-conformance Request (NCR):	Please provide biodiversity monitoring summaries and updates that were compiled for this monitoring period. Please provide some descriptions and analysis of the data collected, and discuss how this information will be distributed to stakeholders in the future.
Date Issued:	31 May 2018
Project Proponent Response/Actions and Date:	The summaries and update on biodiversity monitoring were updated in the MIR.
Evidence Used to Close NCR:	SMART Reports and monthly reports were provided to the auditors. Section 5.4.1 of version 2.9 of the MIR includes results of population estimates for trigger species, indicating stable populations. Item closed.
Date Closed:	20 September 2018

**1.44 GL3 Exceptional Biodiversity Benefits**

<b>Indicator GL3.1</b> - Demonstrate that the Project Zone includes a site of high biodiversity conservation priority by meeting either the vulnerability or irreplaceability criteria defined below, identifying the 'Trigger' species that cause(s) the site to meet any of the following qualifying conditions and providing evidence that the qualifying	<p>The project was validated for Exceptional Biodiversity Benefits, based on the vulnerability and irreplaceability criteria.</p> <p>Over 40 confirmed globally threatened species occur in the project zone</p> <p>The project zone holds significant populations of at least 3 restricted range species and large proportions of the world's population of at least 5 other species.</p>
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<p>conditions are met:</p> <p><b>1.1 Vulnerability</b> Regular occurrence of a globally threatened species (according to the IUCN Red List) at the site:</p> <ul style="list-style-type: none"> <li>a. Critically Endangered (CR) and Endangered (EN) species - presence of at least a single individual; or</li> <li>b. Vulnerable species (VU) - presence of at least 30 individuals or 10 pairs.</li> </ul> <p>OR</p> <p><b>1.2 Irreplaceability</b> A minimum proportion of a species' global population present at the site at any stage of the species' lifecycle according to the following thresholds:</p> <ul style="list-style-type: none"> <li>a. Restricted-range species - species with a global range less than 50,000 km<sup>2</sup> and 5% of global population at the site; or</li> <li>b. Species with large but clumped distributions - 5% of the global population at the site; or</li> <li>c. Globally significant congregations - 1% of the global population seasonally at the site; or</li> <li>d. Globally significant source populations - 1% of the global population at the site.</li> </ul>	
<p>Evidence Used to Assess Conformance:</p>	<p>"Project Expected and Achieved Benefits," as part of title page, section 1.1 of the MR. Section 7.3 of the PDD, site visit.</p>
<p>Findings:</p>	<p>There is little question that the project area includes vulnerable species, including the Yellow-cheeked crested gibbon, which was both seen and heard during the site visit, and Asian elephants, which community members mentioned to the auditors. Two endemic frog species have also been found in the project area, as well as several restricted-range bird species.</p> <p>As confirmed during validation, the project area and zone is home to both vulnerable and endemic wildlife species. Item closed.</p>
<p>Non-conformance Request (NCR):</p>	
<p>Date Issued:</p>	
<p>Project Proponent Response/Actions and Date:</p>	
<p>Evidence Used to Close NCR:</p>	
<p>Date Closed:</p>	
<p><b>Indicator GL3.2 - Describe recent</b></p>	<p>This was discussed in the validated PDD. The trigger</p>

population trends of each of the Trigger species in the Project Zone at the start of the project and describe the most likely changes under the without-project land use scenario.	species chosen were the Asian elephant, the yellow-cheeked crested gibbon and the black-shanked douc. Results of line transect surveys indicate stable populations of the primate species. Elephants throughout the region are known to be declining.  The PDD states it is not known whether the primate species are at carrying capacity, so it is anticipated they will either remain stable or the population will increase under effective management. Elephant population trends will likely require regional analysis, as well as the more localized information from the project area.
Evidence Used to Assess Conformance:	Section 7.3.3 of the PDD.
Findings:	This indicator was successfully answered during project validation, and does not need to be re-examined during this verification event. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator GL3.3</b> - Describe measures needed and <i>taken</i> to maintain or enhance the population status of each Trigger species in the Project Zone, and to reduce the threats to them based on the causal model that identifies threats to Trigger species and activities to address them.	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.
Evidence Used to Assess Conformance:	Section 7.3.4 of the PDD, section 8.1 of the MR.
Findings:	The activities designed to reduce the threats of habitat loss and hunting are in effect. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

<b>Indicator GL3.4</b> - Include indicators of the population trend of each Trigger species and/or the threats to them in the monitoring plan and demonstrate the effectiveness of measures needed and taken to maintain or enhance the population status of Trigger species.	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.
Evidence Used to Assess Conformance:	Sections 7.3 and 8.1.5 of the PDD, section 5.1.5.4 of the MR.
Findings:	This indicator was successfully answered during project validation and does not require re-examination during this monitoring period, unless there is reason to believe monitoring indicators are ineffective. Item closed.

Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

**Validation/Verification Report Requirements For Public Comment Period**

CCBA 30 Day Public Comment Period Dates:	25 April 2018 – 25 May 2018
Please describe all ways in which the 30 day comment period was publicized, especially in regard to local stakeholders. Supply copies (newspaper ads, emails, etc.) when possible.	
How many comments were received?	Via CCBA Website: 0  Via local stakeholder meetings/direct contacts: 0
Supply copies of all comments submitted to the auditors, if any were received during the comment period.	Not Applicable
Respond to all comments appropriately, and show whether these comments caused modifications in some aspect of the project or PDD.	Not Applicable