

CCB & VCS PROJECT REVIEW REPORT

Project ID	1650
Project Name	Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary
Project Proponent	Ministry of Environment of the Royal Government of Cambodia
Methodology	VM0015, Methodology for avoided unplanned deforestation, v 1.1
Sectoral Scope(s)	14 AFOLU
Validation/Verification Body (VVB)	Environmental Services Inc.
Registry	Markit

Assessment Criteria	VM0015, v 1.1, VCS Standard v3.7, CCB Standards Third Edition, CCB Program Rules v3.1
Date of First Issue	16 NOV 2018
Date of Final Issue	28 NOV 2018

Summary:

An accuracy review of the Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary issuance and verification request has been conducted by Verra in accordance with Section 4.3 of the *Registration and Issuance Process* and Section 4.3.28 - 4.3.30 of the *CCB Program Rules*.

The accuracy review has raised 2 assessment findings and 4 minor findings, detailed below. The VVB, in coordination with the project proponent, is hereby required to provide a response to the assessment findings presented in Section 1. The 2 assessment findings must be addressed to the satisfaction of Verra. The VVB need not address the minor findings during this review. Please note, however, that where Verra finds consistent minor findings by the VVB in future reviews, minor findings shall be escalated to assessment findings.

This findings report may be made publically available. Confidential information may be provided as separate attachments.

1 ASSESSMENT FINDINGS

Finding 1

Section 4.3.15 of the *CCB Program Rules v3.1* requires that the VVB adhere to all instructional text within the template. Section 1.1 and 1.2 of the *CCB & VCS Verification Report Template* require the VVB to state the objective of the verification and the scope and criteria for conducting the verification.

Section 1.1 of the verification report does not state that an objective of the verification was to assess whether the project complies with the requirements of the CCB Program or community and biodiversity criteria more generally. Section 1.2 of the verification report does not state that the CCB Program and associated requirements were part of the scope of the verification.

The VVB is requested to please update sections 1.1 and 1.2 of the verification report to clarify if the objective and scope of the verification included the CCB Program and associated requirements.

VVB Response:

Thank you for this comment. Section 1.1 of the verification report was updated to clearly reflect the CCB program objective, assess whether the project complies with the requirements of the CCB Program. ESI is unsure regarding Verra's comment on the lack of CCB criteria in Section 1.2 of the verification report as they are listed under bullet points at the end of the section. Please let us know if we have misunderstood the request.

Verra Response:

Sections 1.1 and 1.2 of the verification report have been updated to clarify that the objective and scope of the verification included the CCB Program and associated requirements. This is sufficient to close this finding and no further response is required.

Finding 1

Section G1.10 of the *CCB Standards v3.1* requires that the project identify likely natural and human-induced risks to the expected climate, community and biodiversity benefits during the project lifetime and outline measures needed and taken to mitigate these risks.

Section 2.2.6 of the monitoring report states that the risk analysis is holistic, covering climate, community, and biodiversity benefits. However, it is unclear based on the description given what the risks are and how the VCS AFOLU Non-Permanence Risk Tool identifies risks to communities or biodiversity. Further it is not stated what actions are taken to mitigate the risks. The referenced Annex 2.2 cannot be found.

The PP is requested to please update sections 2.2.6 of the monitoring report to identify the risks to the climate, community, and biodiversity benefits and what actions are taken to mitigate these risks. The VVB is requested to update the verification report as needed to provide an assessment of changes to the monitoring report.

VVB Response:

Section 2.2.6 of the monitoring report was re-submitted to the verification team by the proponents and subsequently re-reviewed in response to this assessment finding. The risk report is a separate document that is not included as an appendix, therefore the reference to Annex 2.2 has been confirmed removed in MIR v3.4. Table 2.1 was confirmed added to section 2.2.6 which lists the project risks and aligning with the VCS AFOLU Non-Permanence Risk Tool and mitigation actions.

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.

Section 1.20.3 of the verification report was updated to provide a summary of the evaluation for the revisions.

Verra Response:

Section 2.2.6 of the monitoring report has been updated to identify the risks to the climate, community, and biodiversity benefits and what actions are taken to mitigate these risks. Section 1.20.3 of the verification report has been updated to provide an assessment of changes to the monitoring report. These changes are sufficient to close this finding and no further response is required.

2 MINOR FINDINGS

Finding 1

Section 1.4 of the verification report states the project has resulted in the benefits as described in Section 1 of the monitoring report. However, this does not include a discussion or conclusion of the validity of the claimed benefits and whether they were substantiated with information in the body of the monitoring report. In the future please provide an assessment of the summary of project benefits in the appropriate section, following the instructional text in the template.

Finding 2

Section 1.13 of the verification report states that nine methodology deviation have been previously applied to the project, but does not provide any information on these deviations. In the future please include at least a brief description of each of the deviations previously applied.

Finding 3

Section 2.2.2 of the monitoring report does not include any references to the nine previously applied methodology deviations. In the future please ensure the PP includes at least a summary of all deviations applied by the project.

Finding 4

Section 2.3.4 of the monitoring report states that consent was given by communities for the project plan and activities. However, there is no discussion as to how the cost, risks and benefits were communicated to the communities. In the future please ensure the PP provides more information about the communication process and methods used to inform the communities of the cost, risks and benefits of the project.

3 ASSESSMENT CONCLUSION

On 16, November, 2018 Verra issued the initial round of findings to the VVB Environmental Services, Inc. (ESI). The findings raised were regarding the objective and scope of the verification and the risks to the project and mitigation actions taken.

On 28, November, 2018 the VVB provided a response to Verra along with updated monitoring report and verification report. The updated monitoring report identified the risks faced by the project and the actions taken to mitigate such threats. The updated verification report clarified the objective and scope of the verification and provided a positive assessment of the project's mitigation actions.

On 28, November, 2018 Verra closed all findings and the accuracy review.