

# PROJECT REVIEW REPORT

This project review report includes findings raised during Verra’s review of the project specified below. The VVB must address the findings before the project request can be considered for approval by Verra. The project review report will be made publicly available on the Verra Registry. Confidential information may be provided in separate attachments.

<b>Project ID</b>	3019
<b>Project Name</b>	Regenerating degraded lands in Florida through pongamia
<b>Review Type</b>	Registration & Verification Approval
<b>Program(s)</b>	VCS Program
<b>Verification Period</b>	20 August 2018- 09 January 2024
<b>Project Proponent</b>	Terviva and Cultivo Land PBC
<b>Methodology</b>	AR-AMS0007 A/R Small-scale Methodology Afforestation and reforestation project activities implemented on lands other than wetlands, version 3.1.
<b>VVB</b>	TÜV SÜD (formerly Ruby Canyon Environmental)
<b>Assessment Criteria</b>	VCS Standard, 4.7
<b>Date of First Issue</b>	17 November 2025
<b>Review Conclusion</b>	Approved
<b>Date of Final Issue</b>	07 January 2026

## FINDINGS

#	Finding Description	VVB Response	Status
<b>1</b>	<b>Project Area 2018-2023 KML Not Submitted</b>		
	<p><u>Issue</u></p> <p>The project has not submitted the Project area 2018-2023.kml (Annex 1) which comprises the different plots of lands totalling 502.8 hectares (ha).</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>The VVB must ensure that the project proponent submits the project area 2018-2023.kml which depicts the project area instances totalling 502.8 ha.</li> </ol> <p><u>Program Rule(s)</u></p> <p>VCS Standard, v4.7, Section 3.11.2</p>	<p><b>Round 1</b></p> <p><u>VVB Response</u></p> <p>The VVB is sharing the approved kml file of the PA for a total of 502.8 ha.</p> <p><u>Verra Response</u></p> <p>The KML for the project area has been submitted. This finding has been closed; no further action is required.</p>	Closed
<b>2</b>	<b>Grievance Redress Procedure</b>		
	<p><u>Issue</u></p> <ol style="list-style-type: none"> <li>Section 2.1.4 of the VCS Joint Project Description (PD) and Monitoring Report (MR) and Appendix 16 do not describe which neutral third party will be utilized as external counsel for grievances that require a neutral third party.</li> <li>Section 3.3.1.4 of the Joint V/V Report does not discuss the claim that no grievances were raised during the current monitoring period including an assessment of the evidence used by the VVB to affirm the claim.</li> </ol> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>The VVB must ensure that the project proponent updates the Joint PD/ MR to describe which neutral third party will be utilized as external counsel for grievances that require a neutral third party.</li> </ol>	<p><b>Round 1</b></p> <p><u>VVB Response</u></p> <p>The V/V requested the updates to the Joint PD&amp;MR and updated the corresponding sections of the VV Report, assessing the inclusion of the neutral third party into the Grievance redress procedure and assessing the claim that no grievances were raised during the monitoring period.</p> <p><u>Verra Response</u></p> <p>Section 2.1.4 of the Joint PD/ MR has been updated with the requested information on the neutral third party. Section 3.3.1.4 of the Joint V/V Report has been updated to provide additional information for the assessment of the claim that no grievances were received during the current monitoring period. This finding</p>	Closed

	<p>2. Section 3.3.1.4 of the Joint V/V Report does not discuss the claim that no grievances were raised during the current monitoring period including an assessment of the evidence used by the VVB to affirm the claim.</p> <p>3. The VVB must assess all updates to the Joint PD/MR and update the Joint V/V Report as required.</p> <p><u>Program Rule(s)</u> VCS Standard, v4.7, Section 3.18.4</p>	<p>has been closed; no further action is required.</p>	
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<b>3</b>	<b>Safeguards on risks assessment</b>		
	<p><u>Issue</u> Section 2.2.2 of the Joint PD/MR does not sufficiently assess the risks associated with the project:</p> <ol style="list-style-type: none"> <li>1. <i>Working Conditions</i>: The project does not assess the risk of working conditions during activities such as pruning management, land preparation or harvesting of pongamia beans</li> <li>2. <i>Pollutants</i>: The project does not justify the use of chemical inputs (pesticides and fertilizers)</li> </ol> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB must ensure that the project proponent updates the PD/ MR to:               <ol style="list-style-type: none"> <li>a. Assess risks of working conditions related to activities mentioned above</li> <li>b. Justify the use of chemical inputs and include an assessment of mitigation measures for the associated risks</li> </ol> </li> <li>2. The VVB must assess all updates to the Joint PD/MR and update the V/V Report as required.</li> </ol> <p><u>Program Rule(s)</u></p>	<p><b>Round 1</b></p> <p><u>VVB Response</u> The V/V team confirmed that the Joint PD&amp;MR were updated as requested and updated the VV Report to include more details on the assessment of the Working Conditions and Pollutants risk assessment.</p> <hr/> <p><u>Verra Response</u> Section 2.2.2 of the Joint PD/ MR has been updated with the requested information and the VVB has updated Section 3.3.2.2 of the Joint V/V Report. This finding has been closed; no further action is required.</p>	<p>Closed</p>

	VCS Standard v4.7, Sections 3.19.4, 3.19.7 and 3.19.10		
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<b>4</b>	<b>Stakeholder Consultation and Ongoing Communication</b>		
	<p><u>Issue</u> In Section 2.1.2 of the Joint PD/MR there is no information presented on whether discussions included topics related to:</p> <ol style="list-style-type: none"> <li>a. relevant laws and regulations covering workers rights in the host country</li> <li>b. the costs that may be relevant for stakeholders' participation in the project</li> <li>c. the VCS validation and verification process and the validation/verification body's site visit.</li> </ol> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB must ensure that the project proponent updates the Joint PD/MR to describe if discussions during the stakeholder engagement process included the topics described above.</li> <li>2. The VVB must assess all updates to the Joint PD/MR and update the V/V Report as required.</li> </ol> <p><u>Program Rule(s)</u> VCS Standard v4.7, Sections, 3.18.2 (3), (4) and (7)</p>	<p><b>Round 1</b></p> <p><u>VVB Response</u> The V/V team confirmed that the Joint PD&amp;MR were updated as requested and updated the VV Report to include more details on the assessment of the inclusion of relevant laws and regulations covering workers rights in the host country and the costs that may be relevant for stakeholders' participation in the project in the Stakeholder and communication process.</p> <hr/> <p><u>Verra Response</u> Section 2.1.2 of the Joint PD/ MR and Joint V/V Report has been updated with the relevant information. This finding has been closed; no further action is required.</p>	Closed