



Sustainable Development Verified Impact Standard

SILVADOR CLIMATE ACTION



GreenRaise

Document Prepared by GreenRaise Consulting GmbH

1010 Vienna, Rudolfsplatz 9/8, Austria

Tel: +1 604 619 1585 Email: admin@green-raise.com Website: www.green-raise.com

Project Title	Silvador Climate Action
Version	V1.5
Date of Issue	18 September 2024
Project Location	Romania, Târgoviște
Project Proponent(s)	Silvador Company SRL, Forest Capital SRL Vlad Chitulescu, v.chitulescu@silvador.ro , +1-407-402-08268
Assessor Contact	EPIC Sustainability Services Private Limited R.B. Venkataramanaiah, Director No.41, Anugraha, 1 st Cross, Sundarnagar, India +91 95909 29936
Project Lifetime	01 August 2020 – 31 July 2050; 30-year lifetime
History of SD VISTA Status	No Historical Status
Other Certification Programs	Verified Carbon Standard (VCS) #4511
Expected Future Assessment Schedule	Not Currently Known

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1 SUMMARY OF SDG CONTRIBUTIONS

Table 1: Summary of Project SDG Contributions

Row number	Estimated Project Contribution by the End of Project Lifetime	SDG Target	SDG Indicator	Net Impact on SDG Indicator	Section Reference	Claim, Asset or Label
1)	100% (1,538 hectares) of Silvador private forest lands are voluntarily accredited and certified to FSC Forest Management Standard.	12.0	Increase in the hectares of land certified to sustainable forest management standards.	Implemented activities to increase.	3.2, 4.2, Impacts #1, 2, 3, 4, 5	Claim
2)	343,978 tonnes of greenhouse gas emissions stored and sequestered over the project lifetime from the project area.	13.0	Tonnes of greenhouse gas emissions avoided or removed.	Increase.	VCS Validation Report 3.2, 4.2, Impacts #6, 7, 8	SD VISTA-labeled VCU
3)	Continuation of halted deforestation on 1,538 ha of forest lands spanning project lifetime 30 yrs. (~241,881 m ³ of avoided harvest throughout the project's lifetime).	15.2	15.2.1 –Progress towards sustainable forest management.	Implemented activities to increase.	3.2, 4.2, Impacts #2, 4, 5	Claim

2 PROJECT DESIGN

2.1 Project Objectives, Context and Long-term Viability

2.1.1 Summary of Project Sustainable Development Objective(s)

Silvador Company SRL and Forest Capital SLR (here on in Silvador) own and manage all related activities on their culturally and ecologically significant forest private lands in Romania. Each property is governed by a forest management plan (FMP) which outlines management practices for sustainable harvest and growth targets, as well as social-economic and ecological objectives as per requirements of the Forestry Code (Law 26/1996)¹.

The project consists of a single Project Activity Instance (PAI) totaling an area of 1,538 hectares (ha) and is composed of 8 private forest land parcels located in the counties of Buzău and Dâmbovița, with 3 future instances to be located in Argeș, Prahova, and Teleorman. Further information on the Silvador Climate Action project (SCA) can be found within the VCS Project Description and Monitoring Report Document, located within the VERRA Registry.

Historically Silvador has managed its forest lands with a focus on timber production. The project will maintain forest management initiatives which curtail regular harvesting within the PAI of the project, in addition to implementing third-party sustainable forest certification to the entirety of all their property holdings (currently 62% project lands are certified). These certified lands require on-going monitoring, reporting, and annual external audits.

These initiatives are being undertaken with the primary objectives of actively managing and protecting the forest lands under their ownership to achieve climate benefits, biodiversity benefits, water benefits, and other ecosystem services benefits.

The SCA will achieve these sustainable development objectives through the following activities:

- Group Activity 1 – Sustainable Forest Management
- Group Activity 2 – Climate Action Initiative

It is expected that Silvador will positively contribute to sustainable development as defined by and tracked against the United Nations Sustainable Development Goals (SDGs). The applicable SDGs include:

¹For more information on Law 26/1996 see: <https://www.fao.org/faolex/results/details/en/c/LEX-FAOC176434/>.

- 12 – Responsible Consumption and Production
- 13 – Climate Action
- 15 – Life on Land

The project outlined within this document follows these steps :

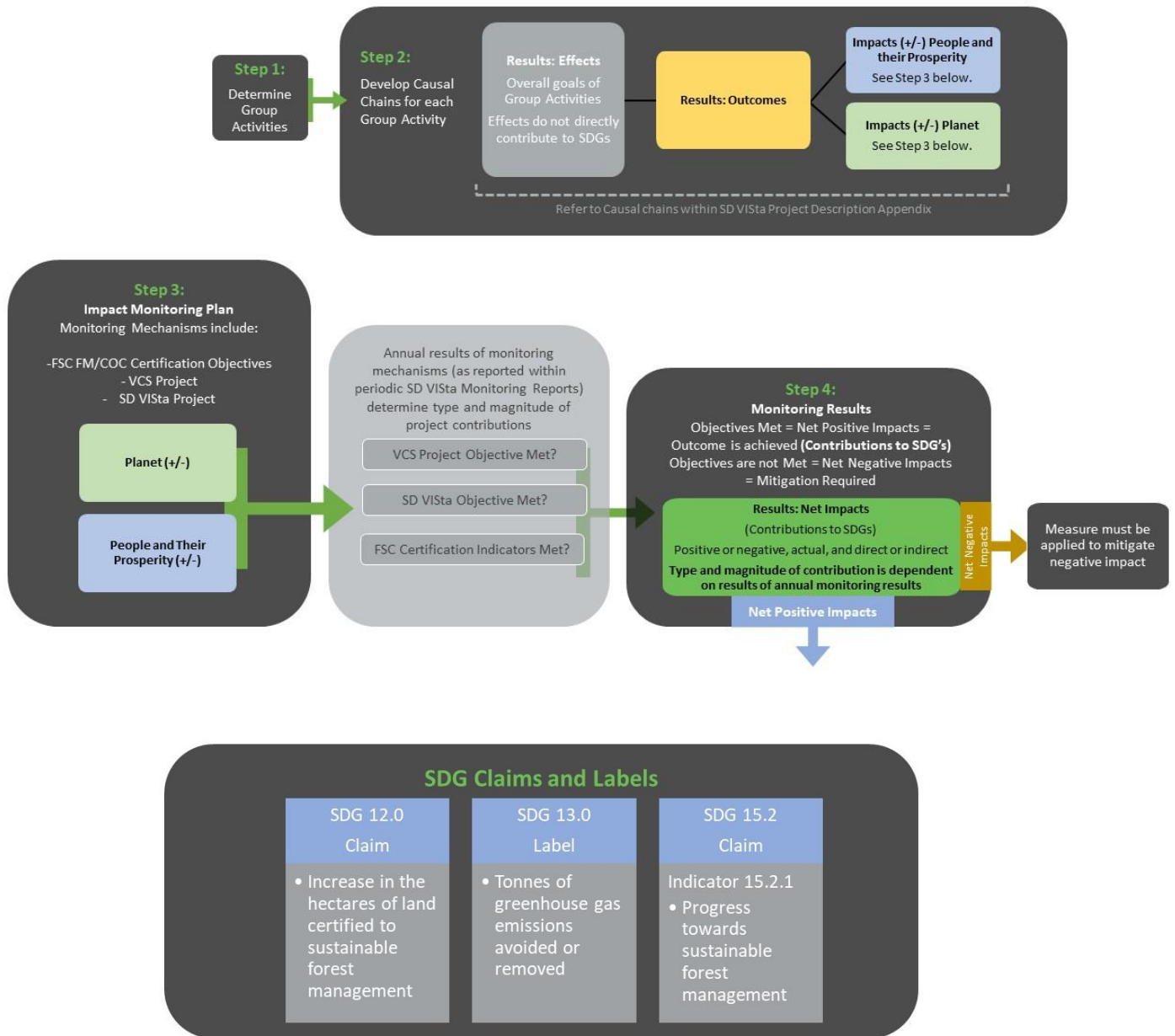






Figure 1: SD VISTA Stepwise Implementation Flow Chart

2.1.2 Description of the Project Activity

Initiatives will be undertaken by Silvador to achieve the noted sustainable development objectives via the following activities:

Table 2: Project Activities

Project Activity	Description	SDG Targets
Group Activity 1 – Sustainable Forest Management	<p>This relates to on-going forest management plan implementation and maintenance, as well as certification of forest lands to a recognized third-party certification standard on lands owned and managed by Silvador. The certification requires mitigation measures to be implemented to protect water quality, biodiversity, wildlife habitat, species at risk and forests with exceptional conservation value. This sustainable forest management certification requires on-going monitoring, reporting and annual external audits (registration and surveillance) by accredited third parties.</p>	  
Group Activity 2 - Climate Action Initiative	<p>As outlined in the VCS Project Description Document (#4511), Silvador intends to implement a carbon offset project to create greenhouse gas (GHG) emission reductions and removals by converting privately owned operational forest lands to protected forest lands. The project will be implemented following the Verified Carbon Standard (VCS) VM0012 – Improved Forest Management in Temperate and Boreal Forests (LtPF), v1.2 methodology.</p> <p>The current PAI Current is within 1,538 ha of private forest lands located within managed forests UP I Constantinescu, UP I Forest Capital (Hodoba, Popescu, Barbu), UP I Manesti, UP I Cornatel, UP I Valea Tisei, and UP V Barbu as established as under the Law No.7 Of March 13, 1996 (Republished) Cadastre and Real Estate Advertising² Romania.</p>	

² Law No.7 of 13 March 1996: <https://www.global-regulation.com/translation/romania/3748442/law-no.-7-of-13-march-1996-%2528republished%2529-cadastre-and-real-estate-advertising-nr.-7-1996%2529.html>

Project Activity	Description	SDG Targets
	<p>This forest carbon project area is non-contiguous, with land parcels located throughout the counties of Buzău, and Dâmbovița</p> <p>Through the curtailment of timber harvesting within the project activity instances, an estimated 343,978 tonnes of carbon dioxide equivalent (tCO₂e) will be reduced from the atmosphere during the life of the project. This project requires on-going monitoring, as well as validation/verification audits by accredited third parties.</p>	

2.1.3 Implementation Schedule

This is the initial SD VISta assessment for the Silvador Climate Action project (SCA). See table below for key dates and milestones in the project's development and implementation, as well as the monitoring and assessment schedules:

Table 3: Project Key Dates and Milestones

Date	Milestone(s) in the Project's Development and Implementation
August 1, 2020	<p>SCA project start date.</p> <p>Climate Action Initiative – Commence curtailment of harvesting activities within project instances.</p>
March 11, 2021	FSC-STD-40-004 V3-1 COC – 000992 Issued (2021-2026) Silvador Company SRL
November 24, 2021	FSC FM-COC – 028522 4th Surveillance Audit by NEPCon OU
April 28, 2022	FSC STD-40-004 Standard for COC – 000992 Certification 1st Surveillance Audit (Silvador)
November 9, 2022	FSC FM COC – 028522 1st Reassessment Audit by NEPCon OU
October 30, 2023	Verified Carbon Standard (VCS) Validation/Verification for periods 2020, 2021, 2022
October 30, 2023	Sustainable Development Verified Impact Standard (SD VISta) validation/verification for periods 2020/2021/2022
2024	FSC FM COC Certification Main Assessment Audit- remainder of project properties

2025	FSC FM COC 1st Surveillance Audit- remainder of project properties
Annually/On-going	Project area monitoring and management
Annually/On-going	Project Verification Audits (VCS, SD VISTA),
Annually/On-going	FSC STD-40-004 Standard Surveillance Audits
Annually/On-going	FSC FM COC Surveillance Audits

2.1.4 Project Proponent

Organization Name	Silvador Company SRL
Role in the Project	Project Proponent
Contact Person	Vlad Chitulescu
Title	Director
Address	Bld, Libertatii nr.1 Targoviste, Dambovita, Romania, 130009
Telephone	+40 0740 208 268
Email	v.chitulescu@silvador.ro

Organization Name	Forest Capital SRL
Role in the Project	Project Proponent
Contact Person	Vlad Chitulescu
Title	Director
Address	Viforata, Silozului Nr.2 Aninoasa, Dambovita, Romania 130007
Telephone	+40 0740 208 268
Email	v.chitulescu@silvador.ro

2.1.5 Other Entities Involved in the Project

Organization Name	GreenRaise Consulting GmbH
Role in the Project	Authorized Representative, Implementation Partner, Project Developer
Contact Person	Jason Zimmerman, RPF
Title	Director
Address	1010 Vienna, Rudolfsplatz 9/8, Austria
Telephone	+1 604 619 1585
Email	jason@green-raise.com
Organization Name	Global Forest Support GmbH.
Role in the Project	Listing Representor, Authorized Representative
Contact Person	Jason Zimmermann, RPF
Title	Director
Address	1010 Vienna, Rudolfsplatz 9/8, Austria
Telephone	+1 604 619 1585
Email	jason@globalforestsupport.com
Organization Name	Zimmfor Management Services Ltd.
Role in the Project	Implementation Partner, Project Developer
Contact Person	Jason Zimmerman, RPF
Title	President
Address	2218-D Airport Drive, Campbell River, BC, V9H 0E2, Canada

Telephone	+1 604 619 1585
Email	jason@zimmfor.com

2.1.6 Project Type

Agriculture Forestry and Other Land Use Sectoral Scope 14
 Improved Forest Management (IFM)
 Logged to Protected Forest (LtPF)

The SCA is a Grouped Project, allowing for the addition of project activity instances (PAI) following project validation.

2.1.7 Project Location

The PAI is located within Silviador's privately owned forest lands. The geographic area includes the counties of Argeş, Buzău, Dâmbovița, Prahova, and Teleorman. Areas bordering the project area include private forest and state lands. The current extent of the Project Area is described by the extent of geodetic coordinates within Table 4 and map below (See Project Description and Monitoring Report document #4511, Appendix 9 for individual polygon coordinates).

Table 4: Project Geographic Boundary

Coordinate System	Extent Coordinates			
	North	South	East	West
GCS_WGS_84	45.274769	44.641421	26.700656	24.957056

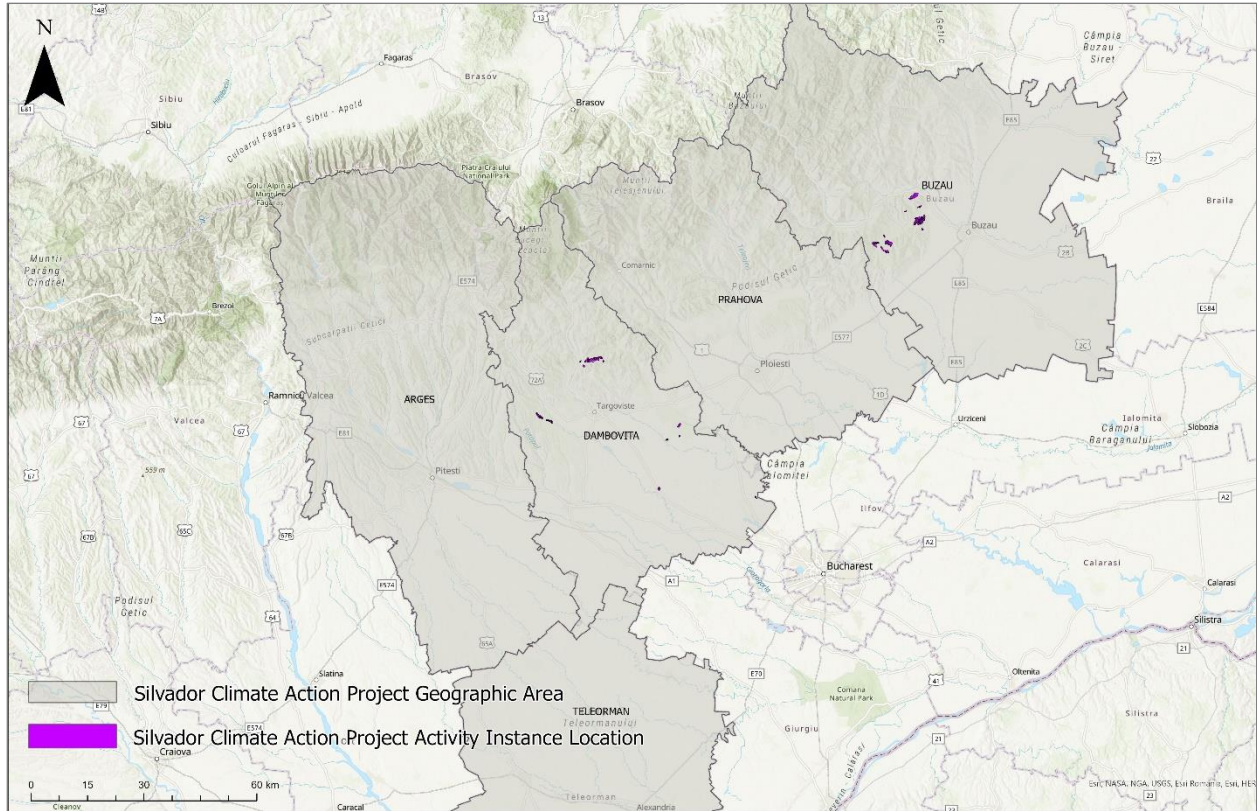


Figure 2: Silvador Climate Action Project Geographic Area

2.1.8 Baseline Scenario

The baseline conditions at the beginning of the project are described as follows. Additional information can be found within sections 3.1 and 4.1.

Social and Economic Capital

Indigenous People

As defined by the United Nations, Indigenous Peoples are those that “have retained social, cultural, economic, and political characteristics that are distinct from the those of dominant societies in which they live³.” Romania is home to inhabitants that have centuries of cohabitation and settlement history which has resulted in an ethnical group majority with equal rights, therefore no such people are classified or identify as indigenous in Romania.

Communities

Silvador SRL and Forest Capital SRL maintain strong relationships with local communities. Public access to privately owned forest lands owned and managed by the project proponents helps to

³ <https://www.un.org/development/desa/indigenouspeoples/about-us.html>

maintain relationships with community members. The project proponents allow privately managed forest lands to be used for hunting and other recreation purposes such as hiking and plant foraging.

Natural Capital and Ecosystem Services

The project area includes mid-elevation foothills and sub-alpine forests of the southern Romanian Carpathian Mountains. The Carpathian Mountains are the second longest mountain system in Europe, spanning seven countries which include Czechia, Hungary, Poland, Serbia, Slovakia, Ukraine, and Romania. The large scale of the Carpathian Mountains makes it a significant source of biodiversity in Europe, hosting Europe's largest populations of brown bears, wolves, lynx, bison, and rare bird species (ADAPT, 2023). This area is a significant source of ecosystem goods and services, including food, fresh water sources, forest products, and also provides a variety of tourism and recreation opportunities. The Southern Carpathian Mountains are also the headwaters of the Olt River and several smaller rivers which feed into the Danube River.

In Romania, the forestry sector has contributed, on average, between 3.5 and 4.5% to the Gross Domestic Product over the last twenty years,⁴ and employed approximately 49,900 persons in 2021⁵. Firewood and other wood-derived products are the primary heating source for over 3 million households. According to Halalisan et al⁶ the following traits of the forestry sector trade were identified:

- Between 1970 and 1980, the emphasis was on technical progress, meaning a minor but constant improvement in the trade balance.
- Between 1980 and 1990, the public debt became noticeable, and the trade balance started to deteriorate.
- After 1990, the trade balance properly mirrored the shift from Communism to a capitalist economy. Additionally, the forestry industry suffered the effects of the 2007 economic crisis, with a slight decline in turnover.

Before the project started, Silvador managed its forest lands for maximum timber harvest production, as determined by forest management plans. This is both a common and historical practice for forest owners in Romania. Much of the timber harvested by the project proponent is sold to local and regional lumber mills. The project proponent has identified key ecological objectives and developed protocols appropriate for its industrial forestlands. These objectives/protocols consider the project proponent's

⁴ External Trade Facts for Romanian Forestry Sector see : https://revistapadurilor.com/wp-content/uploads/2017/09/2.RP000070_Nicorescu_et_al_BT.pdf (accessed on 09.13.2024)

⁵ Trading Economics (2023). Romania Exports of wood and articles of wood, wood charcoal. Trading Economics.com. <https://tradingeconomics.com/romania/exports/wood-articles-wood-wood-charcoal> (mania Exports of wood and articles of wood, wood charcoal)

⁶ Hălălișan A.F., Nicorescu A.I., Popa B., Neykov N., Marinescu V., Abrudan I.V., 2020: The relationships between forestry sector standardization, market evolution and sustainability approaches in the communist and post-communist economies: The case of Romania. *Notulae Botanicae Horti Agrobotanici Cluj-Napoca*, 48, 1–16, doi:10.15835/nbha48312007.

economic objectives, legislative requirements, interactions with adjacent land ownership, and current knowledge of the biological responses to various silviculture practices.

2.1.9 Causal Chain(s)

The SCA is not generating SD VISta assets.

Refer to Appendix 1 for the group activity causal chains describing the SCA's effects, outcomes, and impacts on sustainable development activities.

2.1.10 Threats to the Project

The table below outlines likely natural and human-induced threats to the sustainable development benefits during the project lifetime and their mitigation measures.

Table 5: Threats to sustainable development benefits

Risk	Category	Description and Mitigation Measures
Fire:	Natural and Human Induced Event	<p>Large, intense forest fires are uncommon in Romania (Anfodillo et al., 2008). A fire occurrence would mean a potential loss of forest biodiversity, species habitat, critical and natural ecosystems, and carbon sequestration activities.</p> <p>Humans or natural weather events can cause fires. To mitigate the potential, the project proponent will enact the following fire prevention strategies:</p> <ul style="list-style-type: none"> • Signage and gates to prevent public access to susceptible areas. • Employees trained in fire suppression tactics and equipment usage and dispatched if a fire occurs. • Employed forestry management companies are responsible for monitoring their private lands. • Weather patrols and passive monitoring and communications by adjacent communities and adjacent property owners.
Pest & Disease	Natural Event	Insects and diseases tend to target specific coniferous and deciduous tree species, and

		<p>their impacts are heightened following stressful events in a forest stand, like frost damage, windthrow, or drought. The effects on native ecosystems, habitats, and wildlife diversity can vary from minimal to extreme, as such is the case with spruce beetle infestations.</p> <p>In the project lands owned by the proponent, these preventative processes will be put in place to minimize the damage such as:</p> <ul style="list-style-type: none"> • Monitoring of forest conditions to identify and treat health concerns early on. • Reforest areas using only native species. • Ensure the timely removal of infected trees to prevent further spread of disease or insects.
Extreme Weather Events	Natural Event	<p>Severe weather events are common in Romania (Anfodillo et al., 2008; Turbe et al., 2012), with windthrow being the most common weather-related disturbance. These occurrences generally impact small areas, which means minor effects on native ecosystems, habitats, species, and biodiversity.</p> <p>The project proponent will implement forest management practices to mitigate the damages from severe weather. These will include managing the size of open areas, forest stand density, species structure, and regular area checks by staff.</p>
Geological Events	Natural Event	<p>Geological events such as volcanic eruptions, earthquakes, landslides, and mass floods have a minimal likelihood of occurring.</p> <p>The project properties will be regularly monitored, and incidents will be handled case-by-case.</p>
Political Risk	Human Induced	<p>Any risk to sustainable development benefits from political risk would be</p>

		considered extremely low, as Romania is an Annex I country ⁷ , and party to the United Nations Framework Convention on Climate Change.
Land Ownership Claims	Human Induced	The project proponent owns all of the project lands, therefore there are no threats to any benefits concerning legal ownership risks.
Illegal Harvesting	Human Induced	Illegal harvesting activities can affect natural ecosystems and species' habitats. The project proponent will regularly monitor illegal activities and report occurrences to authorities. To prevent further events, locked gates, signage, and cameras will be installed in such areas.
Stakeholder Engagement	Human Induced	<p>Engagement from all community members is vital for ensuring biodiverse and culturally important areas are identified and protected. The proponent will ensure stakeholder engagement is ongoing by following the procedures below:</p> <p>Identifying and maintaining a stakeholder list of those groups interested in or affected by forest practice activities.</p> <p>Participating in regular Forestry Association board meetings, including those municipality members who may be affected by activities.</p> <p>Notifying the public and previously identified stakeholders at annual meetings to communicate concerns or identify social or environmentally significant areas.</p> <p>Making a comment form available to community members for feedback.</p>

Project Longevity

Threats to project longevity are related to legally binding agreements. None of the activities listed above are under a legally binding agreement to continue management activities, however, all activities are carried out as per the Salvador Field Operating Procedures, and the Oculul Silvic Evergreen

⁷ As listed on the UNFCCC website: <https://unfccc.int/process/parties-non-party-stakeholders/parties-convention-and-observer-states>

Procedures⁸ specific to the Implementation of Certified Forest Management, which is the collective commitment to sustainable management practices. Many measures, both legal and voluntary, have been implemented to ensure continued commitments and actions to achieve sustainable forest management and project activity.

The Silvador corporate governance policy states the “commitment to support responsible forest management practices that protect biodiversity and ecosystem integrity”, which is guidance for all employees and contractors alike. Any deviation from these commitments would be considered an extreme variance of company strategies at the corporate level, which would also require full support from the executive management team. Due to the unlikely occurrence that this would occur, the threat associated with project longevity can be considered low.

2.1.11 Benefit Permanence

The project proponent has planned measures to ensure that the sustainable benefits are maintained and enhanced after project activities have ceased. All forest properties purchased and owned by Silvador are recognized by law as operational forests, and each area must operate under a regulatory-approved forest management plan, which must be renewed every ten years. For each plan, an environmental assessment is carried out to determine sustainable harvest and growth targets and social-economic and ecological objectives. This includes protecting environmentally sensitive areas, important biodiversity habitats, and native ecosystems and identifying and managing other significant non-timber resources.

This is also the case for Forest Stewardship Council (FSC) Forest Management certification on Silvador project properties. Currently, 62% are certified, with 100% certification expected by the project’s end. Under FSC certification, the proponent must comply with all applicable laws, maintain and enhance local communities’ social and economic well-being, and maintain, conserve, and restore natural ecosystem services.

Many legal and voluntary measures will be implemented to ensure continued commitments and actions to achieve sustainable forest management and project activity.

Additionally, refer to 2.1.10 above for mitigation measures implemented to reduce threats to SCA.

2.2 Stakeholder Engagement

2.2.1 Stakeholder Identification

A stakeholder (excluding an interested stakeholder) as defined in the Sustainable Development Verified Impact Standard v1.0 is any person who can potentially be affected by the project.

Initially 34 potential stakeholders were identified geographically, i.e., those within a set buffered distance from the PAI, and by the project proponent, utilizing stakeholder lists already established as

⁸ Information on the specific procedures can be found in document “Procedurile Specifice Implementarii Certificarii Managementului Forestier”, Confor MCMF Vers1/10.08.2017

part of regular business as a forest landowner in Romania as well as utilizing the procedure outlined below.

The proponent provided a categorized description of people potentially impacted by the project. Stakeholder contacts were chosen to:

- Cover national, county, and smaller-scale levels,
- Provide a range of stakeholder organization sizes, from larger institutions through to small organizations and individuals,
- Provide a range in geographic coverage, with a focus on areas where forest management is likely a priority.

Information was collected with the goal to:

- Identify digital contact information (i.e., email addresses), as the primary point of contact (to maximize the duration of consultation, to speed up the response process, and to facilitate responses and information sharing, and
- Provide a sufficient number of contacts, commensurate within available information and the size of the project area.

Once potential stakeholders were identified they were categorized as follows to ensure adequate representation had been achieved across the following categories:

1. Economic
 - Other Forest Owners (adjacent to the project area)
 - Forest Contractors
 - Representatives of Forestry Workers/Industry
2. Social
 - Non-government organizations
 - Community Representatives (local; cultural interest)
3. Environmental
 - Non-government organizations
 - Local Communities
4. Forest Agencies
 - National/Federal
 - State/County

Further analysis was completed to identify stakeholders that could be impacted by the project via the Causal Chain Analysis (refer to Section 2.1.9). All stakeholders identified through the risk ranking process were classified as “impacted” and were further designated as a stakeholder or interested stakeholder by the project proponent. All identified stakeholders were included in all public outreach activities.

As required under SD VISta, stakeholders were further categorized into stakeholder groups based on similar income, livelihood, well-being and/or cultural values and whose values are different from those of other groups.

2.2.2 Stakeholder Description

See Table 6 below for a description of stakeholder groups and their relevance to the project. The stakeholder groups, Male, Female, and Gender (un/non-defined) have been added below to demonstrate gender group visibility and have the potential for multiple group applicability, for example, a Female and an Economic Forest Contractor. No stakeholders were identified as having rights to the land resources associated with the project activities.

Table 6: Stakeholder Groups and Relevance to the Project

Stakeholder Group	Relevance to project
Male	Proponent does or could potentially employ male workers (directly and indirectly).
Female	Proponent does or could potentially employ female workers (directly and indirectly).
Gender (un/non-defined)	Proponent does or could potentially employ workers of un/non-defined gender (directly and indirectly).
Forestry Contractor (Direct)	Direct, forestry contractors are contractors who are currently employed by the project proponent. Includes the following stakeholder categories: Economic.
Forestry Contractor (Indirect)	Indirect, forestry contractors are contractors who are not currently employed by the project proponent, however, could potentially be employed in the future or has been employed in the past by the proponent. Includes the following stakeholder categories: Economic, Forest Agencies
Interested Stakeholder	Interested stakeholders are designated as any person, group or persons, or entity that has shown an interest, or is known to have an interest, in the activities of the project, but that will not be materially affected by those activities (e.g., local or international NGOs). Includes the following stakeholder categories: Social, Environmental

Below is a table of the categorized SCA stakeholder groups contacted by email for initial consultation purposes.

Table 7: SCA Identified Stakeholders

Stakeholder Group	Number of Persons Contacted for Consultation
Forestry Contractor (Direct), Male	1
Forestry Contractor (Indirect), Male	15
Forestry Contractor (un/non-defined gender)	2
Interested Stakeholder	16

2.2.3 Stakeholder Consultation

Stakeholder consultation was conducted through website feedback platforms, publicly attended townhall meetings, and local onsite verification validation interviews. Initial stakeholder consultation was conducted on November 28th and 29th, 2022. Consultation was conducted both via electronic documents, delivered by email on November 23, 2022, as well as in-person invites to “Town Hall” meetings in Romania held on:

- November 28th, 2022, within county of Dambovita at Aninoasa, Viforata, street Silozului nr.2
 - o Approximately 40 invitations; 7 persons attended, all representatives from the forest economic sector.
- November 29th, 2022, within county of Prahova at Ploiesti street Buzaului nr.1
 - o Approximately 40 invitations; 7 persons attended, all representatives from the forest economic sector.

Several other stakeholder consultation meetings were held through the week of January 8th during the project onsite verification and validation. Email notifications were sent out January 3rd and January 5th to approximately 35 stakeholders.

January 8th, 2024, Targoviste at Targoviste Bld.Libertatii nr.1 bloc B2, parter Romania 130009

- o 20+ persons attended, representatives from the forest economic, environmental non-governmental organizations (NGO), and state forest agencies; validation/verification body (VVB) was present.

January 9th, 2024, Targoviste at Targoviste Bld.Libertatii nr.1 bloc B2, parter Romania 130009

- o 10+ persons attended, representatives from the forest economic, environmental NGO, state forest agencies, and social community representatives; VVB was present.

January 10th 2024, Casa Padurarului, Sasensii Vechi Romania 127684

- o 4 persons attended, social community representatives from Vechi; VVB was present.

January 11th 2024, City Hall, Primaria Tisau, No.6 Izvoru Tisau Romania

- o 10+ persons attended, social community representatives from Izvoru; VVB was present.

On February 16th 2024, a follow up town hall occurred at Targoviste Bld.Libertatii nr.1 bloc B2, parter. This gave an opportunity for those stakeholders who were unable to attend any previous meetings to learn about the project, give feedback, and ask questions if any arose. A email invitation was sent out February 8th, 2024 to approximately 45 stakeholders. 4 oersons attended and all were from Silvador Company SRL.

The meetings were organized and chaired by the Project Proponent and attended by the Project Developer and Implementation Partner. Attendance was taken at local Town Hall meetings and is kept on file. Project information relating to the design and implementation, any risks, costs or benefits to local stakeholders, all relevant law and regulations covering workers' rights in Romania was provided in person as well as via the GreenRaise website (<https://green-raise.com/projects/>). Links to the Verra Project Registry are also provided on the Greenraise website.

No marginalized and/or vulnerable groups were identified and therefore no special attention was required to be paid to optimizing benefits to these groups.

Online forms are made available on the GreenRaise website and are used to collect stakeholder comments and feedback. Comments received through other means (i.e., town halls or direct emails) will be collected and stored within the proponent's data base systems.

All public comments received through the online comment form were recorded within the Consultation Database. Response, and any required project design updates to the project design relating to comments received from Stakeholders were also tracked within the Consultation Database. The Consultation Database will be made available to the VVB during project Validation and Verification.

Response, and any required project design updates to the project design relating to comments received from Stakeholders from Verra will also be tracked. All consultation information will be made available to the VVB during project Validation and Verification. Refer to the GreenRaise GHG –Stakeholder Consultation + Engagement SOP for additional details relating to Stakeholder consultation processes.

To date, no comments have been received through the local stakeholder consultation process. If comments are received in the future, they will be summarized, along with the Project Proponent's response and made available to the VVB during validation audits. For privacy reasons, public comment information will not be shared publicly.

2.2.4 Continued Consultation and Adaptive Management

The online feedback forms will remain accessible to the public throughout the lifetime of the project, allowing for continual stakeholder engagement. If required throughout the life of the project, any additional information that is required to be communicated to stakeholders will follow the same process of electronic correspondence via email and information provided via the GreenRaise and Silvador websites as described in Section 2.2.3 above. Additionally, if it is determined that information is not effectively reaching stakeholders, the Proponent's will consider hosting periodic open houses when necessary.

2.2.5 Anti-Discrimination

Measures were taken throughout the stakeholder consultation process to ensure that the project proponent and all other entities involved in project design and implementation are not involved or complicit in any form of discrimination or sexual harassment with respect to the project. Under the Romanian Government Ordinance no. 137/2000, and punishable under the penal code, all persons regardless of their status⁹ are protected against discrimination, harassment, and victimization. Employees and contractors hired by the project proponent fall under the safeguard of regulatory frameworks of the National Labor Code, the Law on Occupational Health and Safety (framework for the OSH), and other government ordinances. These measures, as well as the project proponent's own health and safety program ensure that the proper procedures and training for health and safety and harassment reporting are in place to inform and address discriminatory issues if they arise. No cases of discrimination have been registered against the proponent¹⁰.

Additionally, correspondence was sent out electronically, presented virtually to interested stakeholders, and was made available on a public website; Town Halls were hosted in neutral locations (i.e., not owned by the project proponent) to allow for unimpeded access to project information and the opportunity to provide feedback.

2.2.6 Worker Training

Where required, training content will be tailored to marginalized and/or vulnerable people using visual aids, translation services, and/ or traditional translations.

Silvador hires employees and contractors for its regular business operations, which include forest harvesting and silviculture-related activities. Some of this work may include maintenance activities on project lands, and job postings may require that applicants have previous knowledge and skill sets regarding forestry works and operations.

Upon starting work with the project proponent, new workers undergo generalized training. This includes reviewing general job safety protocols, emergency response requirements, fire suppression, reporting, and equipment operation and identifying potential job risks and hazards.

Any job-specific training tends to be ongoing and determined by work function. Employee supervisors oversee and document this process.

Contractors hired by Silvador must comply with all laws and regulations following the provisions for occupational safety and health for forest activities outlined in the Labor Code.

⁹ Status as defined in GO. No 137/2000 Article 5 paragraph 2: ““(2) based on the criteria of race, nationality, ethnicity, colour, language, religion, social origin, genetic traits, gender, sexual orientation, age, disability, chronic non-contagious disease, HIV infection, political choice, family situation or responsibility, trade union membership or activity, membership of a disadvantaged category, is prohibited.

¹⁰ FSC Forest Management Certification 4th Surveillance Audit Report, November 24, 2021.

2.2.7 Equal Work Opportunities

It is not anticipated that an abundance of work opportunities will be generated from the project activities themselves. Work opportunities provided by the project proponent are posted publicly on newspaper sites or hiring platforms, highlighting the position description as well as the job requirements. The submission of applications for postings is not restricted in any manner besides by a pre-determined time-frame. Once applications are received, and the pre-determined time frame has concluded, applicants are reviewed and assessed based on their qualifications as it relates to the corresponding job posting. From the applicant pool, applicants may then be chosen for in person interviews to further determine the applicants' qualifications for the posted position.

2.2.8 Workers' Rights

Silvador ensures that workers' rights meet all legal requirements including those of the Core Labor Conventions of the International Labor Organization (ILO) (refer to Section 2.3.9 below), via the ILO code on occupational health and safety for forest activities and the National Labor Code of Romania. These rights are communicated to workers through on-going safety and work training programs, the Evergreen FMC Certification Specific Forest Management Certification Procedures, and the Silvador FSC Policy. Additionally, as part of the management system for health and safety at work, there is a designated Safety System Manager (SSM) who is responsible for ensuring employees are trained in safety compliance, aware of occupational risks and hazards, and have appropriate safety equipment. Subcontractors are required to comply with the Occupational Safety Health Law no. 319/2006¹¹, and provide documentation to project proponents that their workers have been trained, made aware of job risks, and have been provided with protective equipment.

2.2.9 Occupational Safety Assessment

Implementation of the project and its associated risks are directly comparable to the risks related to work associated with forestry activities within Romania. These risks are associated with the proponent's "business as usual" and therefore project specific safety measures are not required. Risks associated with forestry work can include but are not limited to exposure to extreme weather (heat, cold, rain/snow), working in remote locations, working alone, wildlife encounters, slips trips and falls, scrapes, and bruises.

The project proponent is legally obligated to put into action work safe measures that identify, mitigate, and prevent undue risk to their employees. Many programs and activities have been established by Silvador, corresponding to workplace Standard Operating Procedures and Health and Safety Procedures. Anyone working on lands owned and managed by the project proponent is required to adhere to the OHS systems in place. As part of an established procedure, risk evaluations are required to be completed for personnel undertaking new job tasks or working in new areas.

¹¹ Government Decision no. 1/1425 of October 11, 2006 (updated), for the approval and provisions of the Occupational Safety and Health Law no 319/2006. Official Gazette, no. 882. <https://rrc.ro/legislatie/SSM/h%201425%202006.pdf>

Project workers are informed of Silvador's standard operating procedures and all health and safety procedures during their first day as an employee. This is a generalized training day upon which all normative acts regarding general employee safety regulations and management aspects are reviewed, including using protective equipment, assessing for risk hazards, and safety documentation and reporting.

2.2.10 Feedback and Grievance Redress Procedure

Please refer to the Greenraise Grievance Redress Procedure and the Stakeholder Consultation + Engagement for processes relating to the Grievance Redress Procedure. This document will be made available to the VVB during the validation and all subsequent verification audits.

2.2.11 Feedback and Grievance Redress Procedure Accessibility

The GreenRaise Grievance Redress Procedure is made publicly available via the GreenRaise website: www.green-raise.com.

2.2.12 Stakeholders Access to Project Documentation

Project documentation has been made available to stakeholders via the GreenRaise website¹², as well as via the Verra Project Registry¹³. Throughout the lifetime of the project, documentation will continue to be provided to the public in this manner, unless a change in procedure is warranted.

2.2.13 Information to Stakeholders on Assessment Process

Information regarding the process of SD VISta project assessment has been provided to all stakeholders via the GreenRaise website. This information will remain publicly available on the GreenRaise website for the lifetime of the project.

Stakeholders will be made aware of assessor's site visits, as well as how direct and independent communication with the assessor can be achieved, prior to the occurrence via an email notification. If it is determined a stakeholder cannot be reached via electronic means, a notification will be sent out via post mail.

2.3 Project Management

2.3.1 Avoidance of Corruption

The project proponents as listed in Section 2.1.4, are legally incorporated business owners with proof of property ownership registered under the National Agency for Cadastre and Real Estate Advertising as required by Law no. 7/1996.

¹² Information to stakeholders is available at <https://green-raise.com/wp-content/uploads/2023/03/Silvador-Stakeholder-Consultation-Presentation-Mar23.pdf>

¹³ <https://registry.verra.org/>

The project proponents operate all forest regime activities in accordance with governing legislation. All project properties have Forest Management Plans which are a legal prerequisite to timber harvesting and require the approval of an onsite forest official. Timber removed from the forests can only be done via a “document of origin”, and volumes cut are recorded in an electronic timber tracking system implemented by the Romanian government (SUMAL 2.0)¹⁴.

A publicly available anti-corruption procedure has been developed by the project proponents which describe the national implementation and laws regarding anti-corruption, preventative measures, and a company commitment to not receive or offer bribes or goods in relation to employees, clients, or members of authority.

Additionally, the proponents undergo Forest Management and Chain of Custody third party auditing through the Forest Stewardship Council.

2.3.2 Statutory and Customary Rights

Use of lands directly affected by project activities are formally recognized for timber management only. Informally other land uses include hunting, foraging, recreation, and other traditional/heritage practices.

Forest tenure and management in Romania is long established and based on sustainability and close to nature type regeneration practices. Forest lands ownership falls under “state” or “private” owner designation. Ownership includes individuals, municipalities, churches, and the government. The legal right to manage and harvest forest fund properties falls under Law 46/2008, (The Forestry Code), and all forest property owners must adhere to its regulations and ministerial orders.

Forest management activities are carried out according to management plans (mandatory) and administered under the National Forest Administration (Romsilva), or Private Forest District authorities. Proper forest management establishes the economic objectives of productive forest fund stands, while maintaining the biodiversity of natural ecosystems.

Access to the project lands is via forestry (gravel) road networks.

2.3.3 Recognition of Property Rights

Tenure use, land access, and management rights to lands and resources affected by project activities are held by the project proponents and are demonstrated through land title extracts from the Office of Cadastres and Real Estate Publications and FMP documentation in accordance with applicable legislation. These documents are recognized and enforceable by the Romanian Government under applicable laws 18/1991 (Land Resources Law), 169/1997, 1/2000, and 46/2008 (Forest Code).

¹⁴ For a further description see: Rosewood (2021, August 12). Sumal 2.0 Digital Wood Tracking. Forestinnovationhubs. <https://www.forestinnovationhubs.rosewood-network.eu/en/content/digital-wood-tracking>

2.3.4 Free, Prior and Informed Consent

No people live in the project area, and as such, there are no affected individuals whose property rights will be, or are, affected by the project.

2.3.5 Restitution and/or Compensation for Affected Resources

There are no anticipated net negative effects of the project activities, and therefore this section is not applicable.

2.3.6 Property Rights Removal/Relocation of Property Rights Holders

No people live on the land affected by the project activities, therefore there will be no risk of relocation of habitation or livelihood.

2.3.7 Identification of Illegal Activities

Illegal old growth harvesting has been a concern and controversial issue for the state of Romania in recent years, one that has led the European Union (EU) to compel Romania to take urgent action. The majority of reported illegal harvests have occurred in the Făgăraș Mountains and in some designated Natura 2000 sites. To date this issue is still a matter of concern by the EU, who are looking to the Romanian authorities for resolution. Government authorities continue to combat illegal harvesting with revised policies, procedures, and new technologies for timber tracking and monitoring, like SUMAL 2.0.

There is a very low risk of illegal activities occurring that could materially affect the project activities' impacts. The project activities include halting harvesting and project lands do not overlap with any Natura 2000 sites. No illegal harvesting activities have been reported in the PAI to date.

2.3.8 Ongoing Conflicts or Disputes

Romania has undergone multiple land reforms throughout its long and diverse history of ruling factions. From 1947 to 1989, Romania was under a communist regime and private lands were collectivized in order to increase agricultural production and the work force. Many lands became the property of the state or were unjustly expropriated from private landowners¹⁵ and re-distributed to peasants who paid a small fee as the beneficiary.¹⁶

With the fall of communism in 1989, many land conflicts arose regarding original ownership and title. The Romanian government focused its attention on land restitution and compensation through new legislation and regulations in the timelines outlined below. Although not without its own creation of issues, the legislation and land restitutions represent acknowledgement and recompense for the property loss experienced by original land title-holders pre-1947.

1. (1991-1997) Law 18/1991 (Land Resources Law), citizens were able to request and receive restitution of agricultural lands up to 10 ha and forest lands up to 1 ha per family. Land

¹⁵ Wikipedia (2022, December 22). Land Reform in Romania. https://en.wikipedia.org/wiki/Land_reform_in_Romania: https://en.wikipedia.org/wiki/Land_reform_in_Romania.

¹⁶Wikipedia (2023, April 17). Socialist Republic of Romania. https://en.wikipedia.org/wiki/Socialist_Republic_of_Romania

restitution Law 107/1996 former owners allowed to claim forest areas up to 10 ha. (Law of Cadastre and Land Registration), created in order to more accurately document, delineate, record, and publicly share land property boundaries based on technical surveys and deed ownership documents.

2. (1997-2000) Law 169/1997, unresolved legal disputes arising between beneficiary persons and local authorities responsible for law application were transferred to the level of judicial power authority. Law 1/2000, former owners allowed to claim forested lands up to 10 ha.
3. (2000-2005) Law 1/2000, introduction of modality to compensation measures, including land value compensation if repossession of original lands were not feasible and other land disposition unavailable.
4. (2005-Present) Law 247/2005, enforcement and reforms to field ownership and justice regarding disputes.

Currently and over the last 20 years, there have been no ongoing, unresolved conflicts or disputes, or disputes that were resolved, over rights to lands or resources of lands owned by Silvador encompassing the project area ¹⁷.

2.3.9 National and Local Laws and Regulations

There are a range of laws and regulatory requirements on forest lands in Romania. Landowners must ensure that all relevant national legislation is understood and observed. Key Acts and Regulations relevant to private land include, but are not limited to:

Table 8: Legislation Governing Forest Lands

Legislation	General Description
Law 46/2008 (Forestry Code)	Legislation applicable to all forest fund properties in Romania, in particular the ownership rights, management processes and harvest stipulations required for sustainable forest management and environmental practices. Includes mandated Forest Management Plans on forested areas greater than 10 hectares and outlines specifications of plan developments and ownership obligations.
Law No. 18 on Land Fund	This law establishes the land tenure system in Romania. Lands are classified by categories and ownership rights and must be registered in accordance with law. Provisions that are relevant include Procedural provisions IV and V; Use of land for agricultural and silvicultural production, and Land use for agricultural and forestry production.

¹⁷ Tudor, Monica & Rusu, Marioara & Florian, Violeta & Chitea, Mihai & Chitea, Lorena & Rosu, Elisabeta. (2011). Land Related Disputes and Conflicts in Romania. *Agricultural Economics and Rural Development*. 8. 127-145.
https://www.researchgate.net/publication/227360052_Land_Related_Disputes_and_Conflicts_in_Romania

Legislation	General Description
Ministerial Order Nr. 23/2009	This regulation describes the security structures, organizations, and legal obligations of forestry personnel within the framework of forest management and service contracts for the protection of forest funds from illegal activities.
Ministerial Order Nr. 460/2010	The general provision of this order is to establish the certification methodologies for forest management plan development, and the requirements of legal persons applying for the certification of management activities
Ministerial Order Nr. 1039/2010	This order outlines approved methodologies for the technical experts approving and reviewing the quality of forest management planning activities and establishes the conditions of certification for those tasked with creating the management plans.
Ministerial Order Nr. 1540/2011	The required terms, approvals, documents, permits, and collection methods for the harvesting and transportation of timber are outlined in this particular order.
Water Law No. 107/1996	Law providing legal requirements regarding the provisions of water resource use, water management and associated activities, as well as penalties. Forestry aspects include water conservation, soil protection, pollution control, and protected zones around natural waterbodies.
Environmental Protection Law No. 137/1995	Legal framework for the protection and regulations of activities affecting natural resources (water and land environments). Under this law, enforcement is carried out under the authority of the Ministry of Waters, Forests, and Environmental Protection.
Law no. 319/2006, on Work Health and Safety	Law requiring any forest activities concerning health and safety to be monitored by a Labor Inspectorate. The legislation ensures that work environments are safe and outlines challenge procedures for violations of safety requirements.
NATURA 2000	Natura 2000 is a series of ecologically sensitive networks protected throughout the European Union (EU). Its directives recognize and develop sustainable management strategies for birds, animals, and natural habitats via the Bird and Habitat Directives. It is a main driver for biodiversity and nature policies for countries in the EU but does not replace any legally required existing laws. Natura 2000 management plans created for forest lands and wildlife fauna are considered guidelines, not legal obligations.

2.3.10 Project Ownership

Forest Lands within the SCA are legally owned by the Project Proponents Silvador SLR, and Forest Capital SRL. The management of forest resources and implementation of forest operations and plans fall under the directives of Silvador management representatives in accordance with the Forestry Code (Law 26/1996) and the regulations of the forestry regime and administration of the national forest fund.

Land deed documents verifying ownership of the Silvador properties included in the project area were provided through the National Agency for Cadastre and Real Estate Advertising Institution¹⁸. Ownership of each land parcel is identified by a Cadastral office and number, Land section number, and Parcel number. Samples of specific properties included in the project are provided below. Notarized land sale contracts were provided as well.

Table 9: Supporting Ownership Information [sample]

Cadastre Office	No.	Cadastral No.	Land Section.	Parcel No.	Ownership.
Buzau	A1	25902	35, 36	1486, 1491	Forest Capital
Buzau	A1	22473	11	346	Silvador

2.3.11 Grouped Projects

The SCA is a grouped project to allow multiple PAIs to be established within the established geographic area (See Section 2.1.7). Conditions within the geographic area at the time of validation have been used to create the baseline scenario and determine project additionality. The ex-ante scenario has been completed within one clearly defined geographic area for the project. The current project will include two group activities, and initially one PAI.

Eligibility Criteria for the Inclusion of New Project Activity Instances

Inclusion of additional PAI(s) to the SCA must adhere to the following eligibility criteria:

1. The PAI must adopt and implement the project activities in the same manner as specified in the project description.
2. The new PAI must meet the applicability conditions of the SD VISta asset methodology applied to a project.
3. New PAIs are subject of the same scenarios at project start with respect to stakeholder's well-being as determined for the initial PAI,
4. New PAIs are subject to the same scenarios at project start with respect to natural capital and ecosystem services as determined for the initial PAI.

¹⁸ For Further Information, see The National Agency for Cadastre and Real Estate Advertising Institution: epay.ancpi.ro

5. New PAIs are subject to the same processes for stakeholder engagement described in this Project Description.
6. New PAIs are subject to the same processes for respect for rights to lands, territories, and resources – including free, prior, and informed consent.
7. New PAIs must have similar monitoring elements to those set out in this project description.

For clarity, the current PAI meets the eligibility criteria noted above.

3 BENEFITS FOR PEOPLE AND PROSPERITY

3.1 Condition of Stakeholders at Project Start

The project area is non-contiguous, privately owned, and accessible by forestry roads. There are no communities or other ongoing public use for income or livelihood by any people living or who are independent on resources within the PAI that would be affected by the project activities.

The population in Romania as of January 1, 2021, was ~19,119,880¹⁹ people, with the majority (65%) being considered “of working age” between ages of 15-64. Romanian is the official language spoken, second is English, with Hungarian being the largest minority language spoken²⁰. The top three ethnic groups in Romania are Hungarians, Romani, and Ukrainians. There are no indigenous groups in Romania.

The project lands are located throughout the counties of Buzău and Dâmbovița, Romania. Statistics are calculated at a national level, then further refined at a regional level (delineated by geographic location, density of populations, and historical name references). The regions applicable to the project area are the South-East (Buzău) and South-Muntenia (Dâmbovița) respectively.

According to the National Institute of Statistics (January 1, 2021), the South-East region resident population was 2.35 million with the main employment sectors being services (45.4%), industry and construction (30.3%), and agriculture, forestry, and fisheries (24.3%), with the unemployment rate sitting at 3.6%. There is reportedly a high diversity of ethnic speaking and religious communities present here. Agriculture (vineyards) and fisheries (processing, trading, products) are a historic tradition in this region.

In the South-Muntenia region, the population was 2.87 million and the main employment sectors were services (40.8%), industry and construction (32.4%), and agriculture, forestry, and fisheries (26.8%), with the unemployment rate sitting at 3.3%. This region has a well-developed industrial and

¹⁹ World Bank (2023). Gender Data Portal, Population Number. GenderData. <https://genderdata.worldbank.org/indicators/sp-pop/?gender=total>

²⁰ Wikipedia (2023, March 9). Languages of Romania. https://en.wikipedia.org/wiki/Languages_of_Romania

communication infrastructure, a strong agriculture and tourism industry, and a wide range of skilled laborers. The automotive business is the largest employer (by number of employees), in this region.

Romania has a relatively robust and well-established economy. As of 2022 the national unemployment rate was 5.5%. The top three national economic sector contributors in 2021 were services (43%), industry and construction (27%), and agriculture, forestry, and fisheries (30%)²¹. The minimum wage as of January 1, 2023, went from 15.24 RON to 18.15 RON per hour²². Comparatively the average salary in the agriculture, forestry, and fishery sector is 4,747 RON, which is above the 3,000 RON national monthly minimum set wage.

The forestry sector in Romania provides less than 3% of the GDP total gross revenues earned for the country²³ and employed approximately 49,900 persons in 2021²⁴. The direct and indirect relevant stakeholder group (Forestry Contractors) would be considered a fraction of the cohort compared to the national forestry sector as a whole. The estimated percent of employment representation of genders in the agriculture, forestry, and fisheries sector in 2019 was 21.4% for males, and 21% for females²⁵. The forestry sector encompasses all the stakeholder groups defined in Table 10.

²¹ European Commission (2023, March 9). Labour market information:Romania. Living and Working.

https://eures.ec.europa.eu/living-and-working/labour-market-information/labour-market-information-romania_en

²² WageIndicator Foundation EU (2023). Minimum Wage - Romania. Salariulmeu.org/Romania.

<https://salariulmeu.org/romania/salariu/salariuminim>

²³Trading Economics (2023). Romania Exports of wood and articles of wood, wood charcoal. Trading Economics.com.

<https://tradingeconomics.com/romania/exports/wood-articles-wood-wood-charcoal> mania Exports of wood and articles of wood, wood charcoal)

²⁴Eurostat (2023, February 15). Employment in forestry and forestry based industry. Europa.eu.

https://ec.europa.eu/eurostat/databrowser/view/for_emp_lfs/default/table?lang=en

²⁵World Bank (2023). Employment by Sector %. Genderdata.Worldbank.org. <https://genderdata.worldbank.org/indicators/sl-empl-zs>

Table 10: Stakeholder Groups

Stakeholder Group	Description	Condition at Project Start	Relevance to project
Male	Individuals who identify as male.	In Romania, approximately (48%) of the population is male. The project proponent employs male individuals (97% of the workforce) ²⁶ .	Proponent does or could potentially employ male workers (directly and indirectly).
Female	Individuals who identify as female.	In Romania, approximately (52%) of the population is female. The project proponent employs female individuals (3% of the workforce).	Proponent does or could potentially employ female workers (directly and indirectly).
Gender (un/non-defined)	Individuals who choose not to disclose their gender identity or who identify as a non-binary gender.	Current census data does not capture un/non-defined gender individuals. At this time, the project proponent does not employ any non-binary identified, un/non-defined gendered individuals.	Proponent could potentially employ workers of un/non-defined gender (directly and indirectly).
Forestry Contractor (Direct)	Individuals employed directly within the forestry sector.	The project proponent currently employs approximately 2 direct “forestry contractors”.	Forestry contractors are contractors currently employed by the project proponent (directly).

²⁶ Information from Group OS Ever Green Group Audit (FSC), 4th Surveillance Audit 2021, Section 3.2, pp.13. Company Details

Stakeholder Group	Description	Condition at Project Start	Relevance to project
Forestry Contractor (Indirect)	Individuals employed indirectly within the forestry sector.	The project proponent currently employs approximately 2 indirect “forestry contractors”.	Forestry contractors are contractors who are not currently employed by the project proponent, however, could potentially be employed in the future or has been employed in the past by the proponent (indirectly).
Interested Stakeholder	Individuals who have an interest in project outcomes. They belong to recreational, social, or other groups as they are directly adjacent to or within the same community as the project and indirectly or directly affected by project activities.	The project proponent conducts annual stakeholder meetings with community members.	Interested Stakeholders could potentially be interested in joining the project (directly and indirectly).

3.2 Expected Impacts on Stakeholders

Table 11: Expected Impacts on Stakeholders

Impact #2	Public Health Resource
Type of Impact	Positive, actual, direct, and intended.
Affected Stakeholder Group(s)	(All Genders), Forestry Contractor (Direct), Forestry Contractor (Indirect), Interested Stakeholder

Resulting Change in Well-being	<p>Significant positive health benefits for all stakeholders with access to project lands that have been identified as having high recreational, or aesthetic values. Areas are available to be enjoyed by all nature enthusiasts and recreationalists.</p> <p>Project proponent actively seeks feedback from community and group stakeholders and in participates in identifying culturally significant areas on managed forest lands.</p>
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Impact #4	Support for Local Communities
Type of Impact	Positive, actual, direct, and intended.
Affected Stakeholder Group(s)	(All Genders), Interested Stakeholders
Resulting Change in Well-being	<p>The impacts to, and importance of, socio-economic services provided through forest management are assessed through regular annual consultation with forestry association members and local groups and communities. Any concerns raised during the consultation are addressed and mitigation measures are put in place until resolutions are reached.</p> <p>Significant positive benefits for stakeholders with access to project lands for hunting, foraging of traditional medicines and foods, non-wood permits, and local rights to firewood.</p> <p>Project proponent regularly issues public access authorizations/permits for personal use and consumptions of natural products and resources available on their private lands</p>

Impact #5	Economic Opportunity
Type of Impact	Positive, actual, direct, and unintended.
Affected Stakeholder Group(s)	(All Genders), Forestry Contractor (Direct), Forestry Contractor (Indirect), Interested Stakeholder

Resulting Change in Well-being	Significant positive benefits for stakeholders, local clients, and owners of timber resource suppliers to communities. Not all lands owned by Silvador and Forest Capitol are in the project, and therefore, both entities still offer employment. There are also opportunities for other small forest owners to supply timber resources to local industry in communities where the project lands have been established.
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Impact #8	Economic Opportunity (Potential job loss)
Type of Impact	Negative, actual, direct, and unintended.
Affected Stakeholder Group(s)	(All Genders) Forestry contractors (direct/indirect)
Resulting Change in Well-being	<p>Minimal negative impact is anticipated due to the geographic distribution across the land base. Workers will still be required for harvest activities outside of the PAI. The potential job losses would most likely be related to the following activities:</p> <ul style="list-style-type: none"> -Harvesting (thinning, yarding crews) -Log transportation (truck drivers) -Silviculture (forestry workers) <p>Mitigation Efforts: Where practicable, forestry contractor workers displaced by harvest deferrals will be given opportunities by the project proponent to continue working in other areas that are not in the project and given preference for maintenance activities that are still required in the PAI as they arise.(windthrow, pest damage, etc.).</p>

3.3 Stakeholder Monitoring Plan

The project proponent will conduct stakeholder group monitoring by monitoring the impacts to stakeholders (identified in Table 6 Stakeholder Groups), annually as previously described in Sec. 2.2.12. Monitoring will be conducted via systems already in place by the organization, i.e., annual FSC surveillance and certification, and annual forest monitoring per FMP. The systems are well established, and roles and responsibilities are already identified throughout the organization. Table 12 below outlines all identified impacts to People and their Prosperity, and how they will be monitored. Refer to tables above for the full description of impacts and the affected stakeholder group(s).

Reporting on monitoring will be completed in the following manner at the designated sampling frequencies:

- VCS – periodically within verification reports (at least every 5 years)
- SD VISta – periodically within verification reports (concurrent with VCS verification events)
- FSC Criterion/Indicators – monitored annually within the FSC Surveillance Audit reports

Table 12: Stakeholder Monitoring Mechanisms

Impact #	Monitoring Mechanism(s)
2	<p>FSC Indicator #4.5.1 – Local Community Relations</p> <p>Stakeholder Groups to be monitored:</p> <p>(All Genders), Forestry Contractor (Direct), Forestry Contractor (Indirect), Interested Stakeholder</p> <p>Monitoring method(s):</p> <p>Annual occurrence of an Evergreen Forestry Association Board of Directors and public consultation meeting</p> <p>Monitoring frequency: Yearly</p> <ul style="list-style-type: none"> - Impact Performance Measure: Annual engagement/on going consultation with local communities and the organization occurs in order to identify significant areas having special cultural, ecological, economic, or spiritual significance to communities. - Target 1: Evergreen Forestry Association Board of Directors, and public consultation meeting per year =1. - Target 2: Community meeting with local stakeholders per year =1.
4	<p>FSC Objective #5.1.2 – Benefits from the Forest</p> <p>Stakeholder Groups to be monitored:</p> <p>All Genders, Interested Stakeholder</p> <p>Monitoring methods:</p> <p>Annual records of volumes of timber deposited at firewood depots for locals in the communities of Buzău and Dâmbovița</p> <p>Monitoring frequency: Yearly</p> <ul style="list-style-type: none"> - Performance Measure: The organization commits to continued support and diversification of local economies through identified benefits and products produced from local ecosystem services within managed forest properties. - Target: cubic meters of firewood to locals for house heating ≥ 7
5	<p>FSC Objective #5.1.1 – Benefits from the Forest</p>

Impact #	Monitoring Mechanism(s)
	<p>Stakeholder Groups to be monitored:</p> <p>(All Genders), Forestry Contractors (Direct), Forestry Contractor (Indirect), Interested Stakeholder</p> <p>Monitoring methods:</p> <p>Annual review of employee and contractor records</p> <p>Monitoring Frequency: Yearly</p> <p>Performance Measure: The organization commits to strengthening and diversifying the local economy through the efficient and sustainable management of forest properties to maintain and enhance the long-term economic viability and the range of social and environmental benefits. Long term sustainability of forest resources means community members and employees can depend on both long-term employment opportunities and the natural ecosystems for years to come. Target: Number of employees ≥ 20</p>
8	<p>SD VISta – Impact #8: Economic Impact (potential job loss)</p> <p>Stakeholder Groups to be monitored:</p> <p>(All Genders), Forestry Contractors (Direct/Indirect)</p> <p>Monitoring Methods:</p> <p>Annual review of employee and contractor records</p> <p>Monitoring Frequency: Yearly</p> <p>Mitigation Effort: Where possible, forestry contractor workers displaced by project harvest deferrals should be re-allocated to other proponent lands for alternate work opportunities.</p>

3.4 Net Positive Stakeholder Well-being Impacts

Due to only identifying one negative impact (Impact #8 – Economic Opportunity (potential job loss)) and 3 positive impacts, it has been determined that there will be a net positive impact to stakeholders’ well-being (see Appendix 2-Summary of SDG Contributions for Monitoring Period-Silvador Climate Action Monitoring Report). Additionally, although the resulting net negative impacts affect the stakeholder groups Forestry Contractors (direct/ indirect), mitigation measures (providing other employment opportunities on other portions of managed lands) are anticipated to neutralize the negative impacts.

4 BENEFITS FOR THE PLANET

4.1 Condition of Natural Capital and Ecosystem Services at Project Start

The project area is located in the counties of Buzău and Dâmbovița, Romania, and encompasses non-contiguous privately owned forest lands within the Temperate Coniferous Forest Global Ecological Zone (as defined by Food and Agriculture Organization of the United Nations (FAO) (FAO, 2001). Historically the Romania region has undergone centuries of various ethnic community settlement spanning centuries. It was first settled by Indo-Europeans as it was at the center of a migratory crossroads, and has been influenced by Greek, Roman, Slavic, Hungarian and Turkish populations.

The landscape of Romania can be described as approximately one-third mountainous (dominated by the Carpathian Mountains), a third forested, and a third composed of hills and plains. The climate is temperate continental and has four distinct seasons. The average annual low temperatures fall between 8-11 °c, with the highs ranging in the mid 20's. Rainfall averages 650mm annually and the soils are generally rich, promoting diverse forest compositions and animal populations²⁷. Forests tend to be multi structured with the main species being beech, oak, pine, and spruce.

The project proponent operates in Romania, EU, on approximately 3,400 ha of privately managed forests. The proponent's forest management plans adhere to strict government regulations for private lands and are subject to the regulations established by Law 46/2008 (the Forestry Code). Forest managers must ensure that the lands are able to sustain periodic harvest activities over the lifetime of the forest. Privately managed forest land is also subject to the Water Law, the Environmental Protection Law, and multiple ministerial orders relating to land use and protection.

The condition of natural capital and ecosystem services specific to the project activities, prior to the project start, are described below:

²⁷ Information sourced from: Britannica (2023). Land of Romania. [www. Britannica.com. https://www.britannica.com/place/Romania/Land](https://www.britannica.com/place/Romania/Land)

Table 13: Natural Capital and Ecosystem Services

Natural Capital/ Ecosystem Service	Condition prior to project start ²⁸	Potential Threats
Forest Ecosystems	Management objectives are to preserve soil fertility and prevent soil erosion, maintain diverse forest ecosystems, ensure the protection of water and riparian areas, optimize industrial wood products in a sustainable manner, and protect and manage non-wood resources for local communities and stakeholders.	Non-adherence to management prescriptions. Climate change related threats (industrial pollution, more frequent extreme weather events leading to habitat degradation). Pests, disease, fire, invasive species.
CO₂ Emissions	No corporate strategies and limited national strategies in place to reduce CO ₂ emission outputs.	n/a
Critical Wildlife Habitat	Protected site locations are available on both the Ministry of Environment and Water and Forests website. Managed lands are compared to identified sites, ensuring there are no overlaps with natural protected areas and field verified. Habitat areas are managed according to legal requirements. Employees undertake on-site environmental assessments before undertaking harvesting activities.	Illegal harvesting, poaching. Non-adherence to management prescriptions. Staff not properly trained in habitat identification leading to misidentification/no identification of critical wildlife habitat.
Forests with High Conservation Values	Forests with high conservation values are special sites identified at both national and regional levels. Forests are managed according to legal requirements and environmental protection laws. Employees complete field assessments before any activities commence and implement prescribed management objectives.	Non-adherence to management prescriptions. Illegal harvesting. Pests, disease.

²⁸ Additional descriptions of prior project conditions can be found in project lands Forest Management Plan

Natural Capital/ Ecosystem Service	Condition prior to project start ²⁹	Potential Threats
Forest Health	Management strategies and objectives are to encourage healthy forests through sanitation and thinning regimes in order to maintain a dynamic forest structure. Stands are regenerated both naturally and artificially with a focus on hygiene cuts to remove damaged, and/or diseased trees, to improve phytosanitary status, and create stands resistant to wind and heavy snow loads.	Pest and disease outbreaks. Extreme weather events (drought, wind, rain). Delayed action to mitigate disease and/or pest impacts.

²⁹ Additional descriptions of prior project conditions can be found in project lands Forest Management Plan

4.2 Expected Impacts on Natural Capital and Ecosystem Services

Table 14: Expected Impacts on Natural Capital and Ecosystem Services

Impact #1	Responsible Consumption of Resources
Type of Impact	Positive, actual, direct, and intended.
Affected Natural Capital and/or Ecosystem Service(s)	Forest Ecosystems
Resulting Change in Condition	<p>Significant positive impacts within the project area due to sustainable management of forest resources and ecosystems. These include but are not limited to:</p> <ul style="list-style-type: none"> -Protection of natural communities and ecological important sites -Reduction of forest conversion -Increased forest biomass through halted harvest operations
Impact #3	Protection of Native Ecosystems and Critical Habitats
Type of Impact	Positive, actual, direct, and intended.
Affected Natural Capital and/or Ecosystem Service(s)	Native Ecosystems and Critical Habitats
Resulting Change in Condition	<p>Significant positive impacts within the project area due to:</p> <ul style="list-style-type: none"> -Identification and protection of native ecosystems and critical habitats -Mitigation of important ecosystems losses from disease, and pest damage, through best management practices.
Impact #6	Decreased CO2 Emissions
Type of Impact	Positive, actual, direct, and intended.
Affected Natural Capital and/or Ecosystem Service(s)	CO2 Emissions

Resulting Change in Condition	Significant positive benefits within the project area due to the reduction in CO2 emissions from harvested biomass
Impact #7	Increase in CO2 Sequestration
Type of Impact	Positive, actual, direct, and intended.
Affected Natural Capital and/or Ecosystem Service(s)	CO2 Emissions
Resulting Change in Condition	Significant positive impacts within the project area due to increased carbon sequestration through the deferral of timber harvesting

4.3 Natural Capital and Ecosystem Services Monitoring Plan

Silvador commits to maintaining their FSC certification and will continue to undergo annual FSC third party external audits where performance to all FSC indicators outlined below, will be assessed, and verified by a third party.

The social and ecological objectives of each forest fund property in the PAI is outlined in each respective forest management plan and can be found in the document under Section 5, (Establishing the Social, Economic, and Ecological Functions of the Forest). FSC performance indicators are measured annually by an external auditor.

Reporting on monitoring will be completed in the following manner at the designated frequencies:

- VCS – periodically within verification reports (at least every 5 years)
- SD VISta – periodically within verification reports (at least every 5 years and/or concurrently with VCS verification events)
- FSC Criterion/Indicator – monitored annually within the FSC Audit reports

Impact #	Monitoring Mechanism(s)
1	<p>FSC Indicator #5.2.3 - Benefits from the Forests</p> <p>Monitoring measurements:</p> <p>Forest management plans for sustainable harvest cut rates and volume will be reviewed and compared to actual harvests records.</p> <p>Annual surveillance reports will be reviewed to determine whether additional project lands added to the FSC Forest Management Certification program are included.</p>

Impact #	Monitoring Mechanism(s)
	<p>Monitoring frequency:</p> <p>Harvest volumes will be monitored annually</p> <p>The FSC Forest Management surveillance/certification audit report will be reviewed annually.</p> <ul style="list-style-type: none"> - Performance Measure: The harvest levels in management units are at or below a level that can be permanently sustained. Actual annual harvest (AAC) levels are recorded and do not exceed the expectations of the allowable level established by the forest management plan for its validity period - Target 1: Project lands are certified to FSC Management Standard \geq 62% - Target 2: 100% of project lands have not exceeded their allowable forest harvesting quotas
3	<p>FSC Indicator #6.5.1 – Environmental Values and Impacts</p> <p>Monitoring Measurements:</p> <p>Area of project lands that are designated for biodiversity conservation and excluded from production felling.</p> <p>Monitoring frequency:</p> <p>The FSC Forest Management surveillance/certification audit report will be reviewed annually.</p> <ul style="list-style-type: none"> - Performance Measure: Representative native ecosystems, including primary forests, marginal habitats, and self-regenerating forests, are identified and protected. - Target 1: More than 10% of representative natural ecosystems in the project are identified, mapped, and maintained (based on procedure P651 ver. 1 2019)
6	<p>VCS – Implementation of Improved Forest Management (IFM) project.</p> <p>Monitoring measurements:</p> <p>The amount of CO₂ emissions avoided in the project during the monitoring period</p> <p>Monitoring frequency:</p> <p>Must be monitored at a minimum of once every 5 years.</p> <ul style="list-style-type: none"> - Performance Measure: Periodic generation of verified carbon units (VCUs) via verification audits.

Impact #	Monitoring Mechanism(s)
7	<p>VCS – Implementation of Improved Forest Management (IFM) project.</p> <p>Monitoring measurements:</p> <p>The amount of CO₂e sequestered in the project during the monitoring period</p> <p>Monitoring frequency:</p> <p>Must be monitored at a minimum of once every 5 years.</p> <ul style="list-style-type: none"> - Performance Measure: Periodic generation of verified carbon units (VCUs) via verification audits.

4.4 Net Positive Natural Capital and Ecosystem Services Impacts

There are no negative impacts to the planet as identified through the SCA causal chain analysis (See Appendix 1). It is anticipated that the net impact of the project will be positive for all-natural capital and ecosystem services.

APPENDIX 1 – GROUP ACTIVITY CAUSAL CHAINS

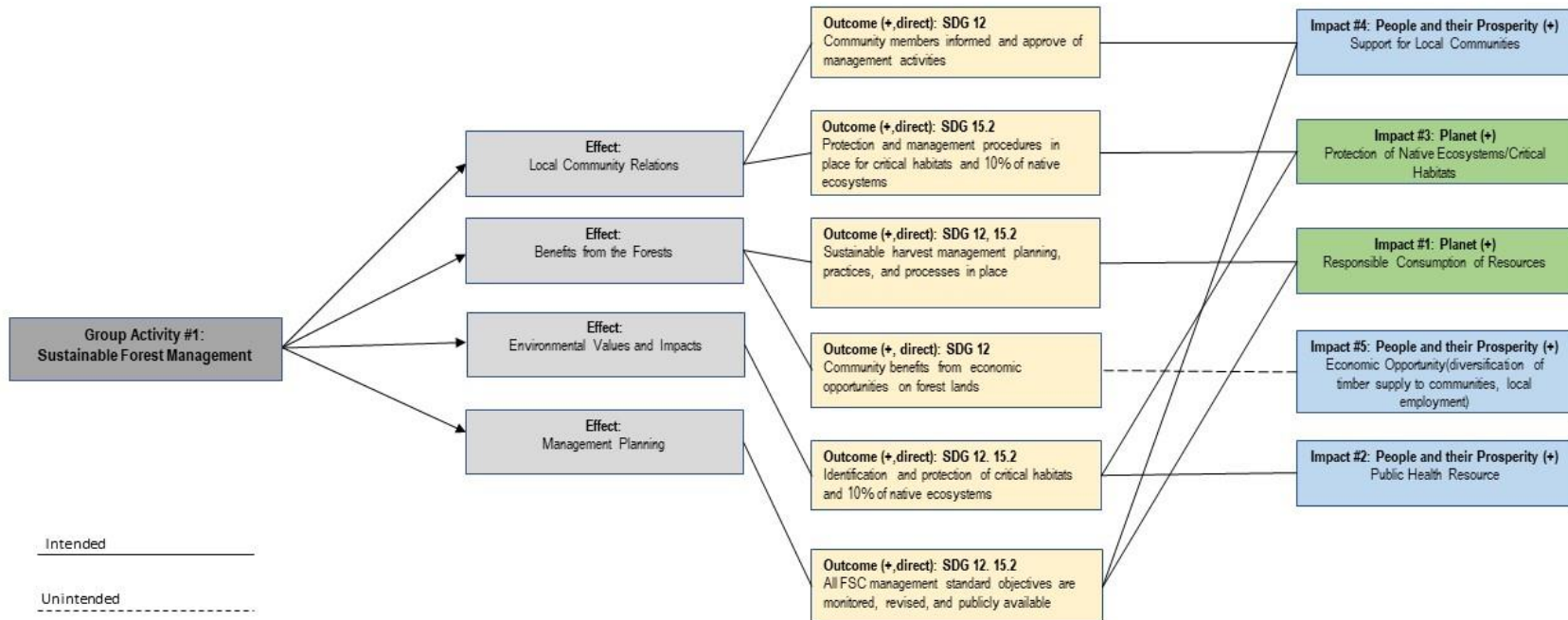


Figure 3: Group Activity #1 Causal Chain

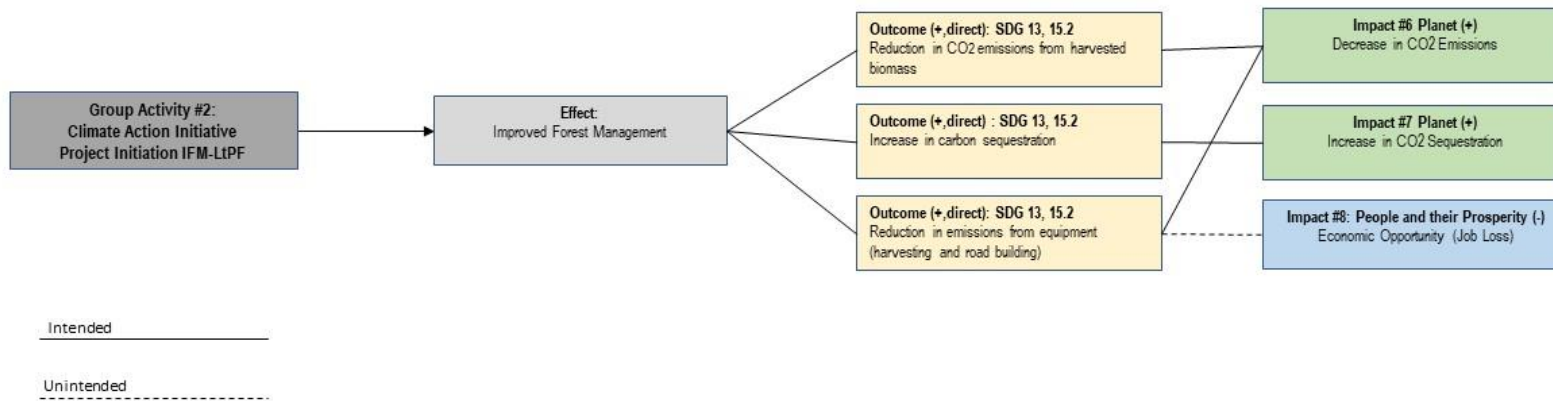


Figure 4: Group Activity #2 Causal Chain

APPENDIX 2 – COMMERCIALLY SENSITIVE INFORMATION

No commercially sensitive information has been excluded from the public version of the project description.