



Sustainable Development Verified Impact Standard

SILVADOR CLIMATE ACTION SD VISTA VALIDATION REPORT



Document Prepared by EPIC Sustainability Services Private Limited

Report title	Silvador Climate Action-SDVista-Validation report
Date of Issue	03 December 2024
Version	1.3
Report ID	ESSPL/VCS/2023/195
Prepared By	EPIC Sustainability Services Private Limited
Contact	N0. 41, Anugraha, 1st Cross Road, Sundarnagar, Near BEL Circle, Gokula Extension, Bengaluru - 560 054, Karnataka State, India. Phone: +91 95909 29936 Email:enquiries@epicsustainability.com, epicsustainability@gmail.com Website: https://epicsustainability.com
Approved By	Mr. R. B. Venkataramanaiah (Director)
Work Carried Out By	Mr. R. Vijayaraghavan (Lead auditor) Mr. Santhosh D. T. (Auditor) Mrs. Sheela H. K. (Auditor) Mr. Dinesh C. V. (Auditor)
Technical review team	Mr. A Prabu Das Mr. Madhusudhana Reddy B

Client	Silvador Company SRL
Project Title	Silvador Climate Action
Project Location	Buzau and Dambovita counties of Romania

Summary

“Silvador Climate Action” is a forest carbon credit initiative intended to achieve GHG reduction and removals through enhanced carbon sequestration. The project is implemented in the non-contiguous private forest areas situated at Buzau and Dambovita counties of Romania. The project is structured as a grouped project, and the first project activity instance consists of an area of 1538 hectares. Additionally, the project involved two group activities namely Sustainable Forest Management and Climate Action Initiative contributing to 3 sustainable development goals such as Responsible Consumption and Production (SDG-12), Climate Action (SDG-13) and Life on Land (SDG-15).

The Validation is conducted by EPIC and the report details Validation information of project. The purpose of the validation was to independently ascertain the project compliance with the SD VISTa requirements. Following the compliance of the project to the standard, the project proponent is authorized to carry out the SD VISTa claims and SD VISTa labels in addition to the VCS project carbon credits which validated separately. The validation involves a combination of document reviews, interviews with project proponents and other involved entities, and on-site field inspections including interviews with relevant stakeholders. The project complies with the validation criteria set out in the Sustainable Development Verified Impact Standard v1.0 and the SD VISTa Program Guide v1.0.

The Validation team raised 2 CLs, 2 CARs and 2 FARs were reported as part of the validation. All the identified issues were effectively resolved through correction, clearer explanations and additional supporting documents. FARs were raised for consideration in the next verification event.

"Silvador Company SRL commissioned EPIC to validate the compliance of the project "Silvador Climate Action" in Romania, against SDVISTa standards. EPIC confirms that all validation activities, including objectives, scope, criteria, level of assurance and project documentation follow SDVISTa Standard v1.0, and are detailed in this report. EPIC concludes that the project description v1.5 meets the requirements of SDVISTa Standard v1.0 and associated tools.

Further, EPIC confirms that there is a reasonable level of assurance, with an acceptable degree of uncertainty, that the SDVISTa project "Silvador Climate Action" meets all relevant validation compliance requirements. The stated benefits by the project activity and validated by EPIC are expected to be achieved in the project lifetime.

CONTENTS

- CONTENTS2**
- 1 VALIDATION PROCESS3**
 - 1.1 Objective 3
 - 1.2 Scope and Criteria 3
 - 1.3 Level of Assurance 3
 - 1.4 Summary Description of the Project 4
 - 1.5 Validation team Composition 4
 - 1.6 Method and Criteria 5
 - 1.7 Document Review 5
 - 1.8 Interviews 14
 - 1.9 Site Inspections 25
 - 1.10 Public Comments 27
 - 1.11 Resolution of Findings 27
 - 1.12 Forward Action Requests 27
- 2 VALIDATION FINDINGS28**
 - 2.1 Summary of SDG Contributions 28
 - 2.2 Project Design 28
 - 2.3 Stakeholder Engagement 32
 - 2.4 Project Management 39
- 3 BENEFITS FOR PEOPLE AND PROSPERITY46**
- 4 BENEFITS FOR THE PLANET51**
- 5 VALIDATION CONCLUSION58**
- APPENDIX A: FINDINGS.....59**
- APPENDIX B: SAMPLING PLAN70**

1 VALIDATION PROCESS

1.1 Objective

In alignment with requirements detailed in Section 5.2 of the SD VISTA Standard, v1.0, EPIC (The Validation team or assessment team) independently evaluated the project titled “Silvador Climate Action” to ascertain its adherence to program guidelines. The sole purpose of the validation is to evaluate the following.

- The likelihood that the executed project will yield sustainable development benefits, as asserted by the project proponent.
- The project’s compliance with the SD VISTA rules.
- The likelihood that the approaches outlined in the SD VISTA Project Document (PD) will result in issuance of SD VISTA Claims and labels when implemented in combination with the VCS project which is validated independently.

1.2 Scope and Criteria

1.2.1 Scope of Validation

In accordance with the information illustrated in Section 5.1.6 of ISO 14064-3:2019 the scope of the validation includes the following.

- Project activities
- Prior baseline scenario in absence of the project
- Carbon pools and GHGs quantified within project boundaries
- Project crediting period and verification period
- The group activities (Refer Section 1.4 below)

1.2.2 Criteria for Validation

The validation of the project is entirely in conformance with the following documents.

- SD VISTA Program Guide, v1.0, Dated 22nd January 2019
- SD VISTA Standard v1.0, Dated 22nd January 2019
- SD VISTA Program Definitions, v1.0, Dated 22nd January 2019

In addition, interviews with project proponents are conducted to gather information on project activities, stakeholder consultations, grievance redress procedures, management capacity, worker training, and other stated project benefits. On-site inspections are carried out to verify project boundaries, baseline scenarios, species composition, risk mitigation measures, and other relevant factors.

1.3 Level of Assurance

Following the requirements outlined in Section 5.2.3 (1) of SD VISTA Standard, v1.0, the level of assurance was considered reasonable. The assurance assessment was conducted regarding potential material errors, omissions or misinterpretations for any reported SD VISTA claims or labels.

1.4 Summary Description of the Project

“Silvador Climate Action” is considered as a forest carbon credit project situated at private forest parcels within the counties of Buzau and Dambovită of Romania. Historically, Silvador has managed its forest lands with a primary focus on timber production. Under the project, forest management practices are expected to be maintained to limit regular harvesting within the Project Activity Instance (PAI) of the project and implemented an Improved Forest Management initiative with the objective of curtailing the regular timber harvesting and transitioning to the conservation forests for a duration of 30 years of crediting period. These initiatives are expected to be implemented with the primary aim of actively managing and protecting the forest lands under their ownership to achieve climate benefits, enhance biodiversity, improve water resources and provide other ecosystem service benefits.

The project is a grouped project and a single activity instance is implemented as of now in 1538 ha of forest area. During historical forest land management, practices prioritized regular timber extraction and the SD VISta project incorporates two group activities aimed at curtailing the harvest activities in the project area.

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

The aforementioned group activities are expected to support the following three Sustainable Development Goals (SDGs)

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

1.5 Validation team Composition

Table 1. Validation team composition, their qualification and area of expertise.

Sl.no	Validation and Verification team members	Overview of relevant qualification and Area of expertise
1.	Mr. R Vijayaraghavan (Lead Auditor)	BE in Mechanical Engineering, M.Tech in Energy Conservation and Management and MBA in Technology Management. He has around eighteen years of industry experience and is qualified as a lead auditor for various GHG / Energy reduction project audits in various countries under various standards and protocols with relevant sectoral experience (AFOLU)
2.	Mr. Santhosh D T (Auditor)	Graduation and post-graduation in the field of Forestry with more than two years of experience in Forestry Research, Academics, and Carbon Accounting with relevant sectoral experience (AFOLU)
3	Mrs. Sheela H. K (Auditor)	Graduation and post-graduation in the field of Agriculture with more than 5 years of experience in Forestry Research, Academics and Carbon Accounting with relevant sectoral experience (AFOLU)

4	Mr. Dinesh C. V (Auditor)	Graduation and post-graduation in the field of Forestry with experience in Forestry Research, GIS Analysis, Academics, and Carbon Accounting with rrelevant sectoral experience (AFOLU)
5	Mr. Marius Turtica (Technical Expert)	Graduation in Silviculture and Forest Engineering with relevant experience in Forest Stewardship Council (FSC) and Program for the Endorsement of Forest Certification (PEFC) audits, with relevant relevant social and cultural expertise. Currently leading a position of Project Manager and President of the Association for Forest Certification, Brasov, Romania.

1.6 Method and Criteria

The Validation team conducted a combination of document reviews, interviews with relevant personnel, as well as onsite field visits to project areas. The scope and criteria of the validation were in compliance with the requirements specified in Section 1.2 of this report.

The Validation team formulated a sample plan highlighting the “Residual risks” area that associated with potential material deviations, i.e. errors, misinterpretations, and omissions. The risks associated were not collectively prevented or detected by the project controls. Sampling and data collection with testing were carried out to address these associated risks. Meanwhile, the Validation team formulated a comprehensive plan in accordance with the requirements outlined in Section 7 of ISO 14064-3:2019. The sample plan involves identified risk, risk level, justification of identified risk and response to the risk in the validation plan. The detailed sampling plan is provided Is Appendix B of this report.

1.7 Document Review

The project proponent submitted the SD VISTA Project Description and Monitoring Reports (SD VISTA PD & MR v1.5, dated November 2024), which were cross-checked by the audit team for conformance with the validation criteria. Additionally, other key supporting documents were uploaded to the project proponent's server (SharePoint) to facilitate access for the audit team. These documents were reviewed by the audit team prior to the onsite visit.

During the onsite audit, the audit team, with the presence of host country technical expert, reviewed supporting documents related to project design and stated requirements. This included verifying the ownership of lands, training records, and other key project details to confirm the validity and appropriateness of the documentation. References made to these documents are provided in the entire report and are noted through their assigned reference number. All the documents reviewed as part of validation process are detailed in the following table.

Table 2. List of documents reviewed for validation.

Ref No	Documents Reviewed	File / Document name / Weblink
1	VCS Joint PD-MR	<ul style="list-style-type: none"> ▪ Silvador_2_Project_Description_Monitoring_Report v1.5

2	Non-permanence risk reports	<ul style="list-style-type: none"> ▪ Silvador - NPV for Non-Perm Risk Report (Feb '24) ▪ Silvador-Non-Permanence-Risk-Report (Feb '24)
3	Estimated GHG emission reductions or removals (tCO ₂ e)	<ul style="list-style-type: none"> ▪ GHG_Estimate_20240202
4	Project Area (KML)	<ul style="list-style-type: none"> ▪ Silvador_Project_Instance_2023
5	Analysis units (KML)	<ul style="list-style-type: none"> ▪ Silvador_AnalysisUnits_2022
6	Reference of all cadastral shapefiles	<ul style="list-style-type: none"> ▪ Cadastral Shapefiles.zip
7	Registration and Incorporation Certificate for the Company	<ul style="list-style-type: none"> ▪ Incorporation document Forest Capital nr. 996 from 30.04.2020 - page number 2.pdf ▪ Incorporation document Silvador from 26.09.2018 - page number 2 to 10.pdf
8	Proof of Ownership (Land Deed Documents)	<ul style="list-style-type: none"> ▪ 03A-Ownership_20231212.zip
9	Tax invoice documents	<ul style="list-style-type: none"> ▪ 5-Tax Documents.zip
10	Purchase sales contracts	<ul style="list-style-type: none"> ▪ 1-Sales Contract.zip
11	Forest Management Companies (FMCs), their authorization and role in forest management	<ul style="list-style-type: none"> ▪ EVG Registration certificate and Authorization.pdf ▪ OSM Registration certificate and Authorization.pdf ▪ FMUs roles.pdf
12	Proof for project Start date	<ul style="list-style-type: none"> ▪ Forest Capital - FMC Ever Green project notification.pdf ▪ Forest Capital - FMC Muntenia project notification.pdf ▪ Forest purchasing agreement - UP I Constantinescu.pdf ▪ Silvador Company - FMC Ever Green project notification.pdf ▪ Silvador Company - FMC Muntenia project notification.pdf ▪ <u>Project Start Date.zip</u> ▪ (Details) APV Registry - Silvador and Forest Capital(SVD).xlsx
13	Forest management plans (FMPs)	<ul style="list-style-type: none"> ▪ Forest Management Plans.zip
14	Romanian Forest Code	<ul style="list-style-type: none"> ▪ The Forest Code (26_1996) revised as The Forest Code 46/2008

		http://legislatie.just.ro/Public/DetaliuDocument/90768
15	NATURA 2000	<ul style="list-style-type: none"> Natura2000_end2021_epsg3035.kml https://ec.europa.eu/environment/nature/natura2000/index_en.htm
16	FSC – Centralized National Risk Assessment, FSC-CNRA-RO V1-0 EN, Dated 20 September 2017	<ul style="list-style-type: none"> FSC-Centralized National Risk Assessment Romania, 2017.pdf
17	Grievance Redress Procedure - SOP	<ul style="list-style-type: none"> GreenRaise SOP - Grievance Redress Procedure (EN).pdf
18	Stakeholder consultation - SOP	<ul style="list-style-type: none"> GreenRaise SOP-Stakeholder Consultation+Engagement (May '22).pdf
19	List of identified Stakeholders, stakeholder consultation email and other documentation.	<ul style="list-style-type: none"> Stakeholder consultation Email and Documentation.zip
20	SOP - GHG Monitoring	<ul style="list-style-type: none"> SOP - GreenRaise GHG Monitoring (Dec'22).pdf
21	Baseline and Project harvested wood products	<ul style="list-style-type: none"> Silvador - PRJ HWP_20240202.xlsx Silvador - BSL HWP_20231218.xlsx
22	Assessment of high value forest by conservation, Dated, 18 November 2021	<ul style="list-style-type: none"> Addendum Report_PVRC_2021 EN
23	Forest inventory data	<ul style="list-style-type: none"> Silvador_Forest_Inv_GC's_Jan24'23.xlsx
24	Final VCUs calculation data	<ul style="list-style-type: none"> GHG Estimate_20240202.xlsx
25	SD VISTA - PDD	<ul style="list-style-type: none"> SD-VISTA-PDD-Silvador Climate Action v1.5 (Nov'24) - Confidential.pdf
26	SD VISTA - MR	<ul style="list-style-type: none"> SD-VISTA-MR-Silvador Climate Action v1.4 (Nov'24) - Confidential.pdf
27	Personnel worker training records regarding work security and health and emergency situations	<ul style="list-style-type: none"> Fisa PSI Ghinea.pdf Fisa SSM Ghinea.pdf
28	Assessment of safety on workers and Periodic Training	<ul style="list-style-type: none"> Report regarding the assessment of safety on workers.pdf

29	Inspection by Labour Inspectorate regarding training the workers	<ul style="list-style-type: none"> ▪ Inspection record of labour inspectorate.pdf
30	Worker Contracts	<ul style="list-style-type: none"> ▪ Services Agrmt-Implement + Sales Marketing (Silvador ForestCapital + GRC GFS) signed FINAL.pdf
31	<p>Companies internal policy for protection against harassment and discrimination in the workplace</p> <p>Audit Share:20240814</p>	<ul style="list-style-type: none"> ▪ Chapter 5 of internal policy: Internal Regulation Book: Folder 27 - Silvador Internal Regulation full EN.pdf <ul style="list-style-type: none"> ▪ 20240100-Zimmfor HSE Policy.pdf ▪ Zimmfor SWP General (January'23)Final.pdf ▪ BullyingHarrasment Backgrounder.pdf ▪ BullyingHarrasmentEmployer.pdf ▪ BullyingHarrasmentInvestigationsGuide.pdf ▪ BullyingHarrasmentPolicyStatement.pdf ▪ BullyingHarrasmentReportingProcedures.pdf ▪ BullyingHarrasmentWorker
32	Silvador website job notification	<ul style="list-style-type: none"> ▪ Forestry truck driver job notification.png ▪ Forwarder operator job notification.png ▪ Revisal Workers.pdf ▪ Skidder, chainsaw and manual operator job notification.png ▪ Translatedskidder, chainsaw and manual operator job notification.pdf
33	Social dialogue and labour code of Romania specifying equal opportunities and necessary requirements	<ul style="list-style-type: none"> ▪ Article 5, Labour Code – Law nr. 53 from 2023: Anti-Discrimination provisions ▪ Article 2, Law no. 202/2002, Law on the equality of opportunity and treatment between men and women: https://www.ilo.org/dyn/travail/docs/1532/LEGE%20%20Nr.%202022002%20equal%20opportunities%20betw.%20men%20and%20women.pdf ▪ Government Ordinance (GO) no. 137/2000 – preventing and sanctioning all forms of discrimination: https://migrant-integration.ec.europa.eu/library-document/romania-government-ordinance-no-1372000-preventing-and-sanctioning-all-forms_en ▪ International Labour Standards on Equality of opportunity and treatment, International Labour Organization: https://www.ilo.org/global/standards/subjects-

		<p>covered-by-international-labour-standards/equality-of-opportunity-and-treatment/lang-en/index.htm</p> <ul style="list-style-type: none"> ▪ Romania as part of International Labour Organization: https://www.ilo.org/budapest/countries-covered/romania/lang-en/index.htm ▪ Social Dialogue Law 367 from 2022(SVD).pdf
34	National Statistics of Forestry Workers by Gender	<ul style="list-style-type: none"> ▪ Page 39 and 40, Women and men life and work partnership, National statistics institute: Women and men - from National Statistics Institute.pdf https://insse.ro/cms/sites/default/files/field/publicatii/femeile_si_barbatii_parteneriat_de_munca_si_de_vita_5.pdf ▪ https://genderdata.worldbank.org/indicators/sl-empl-zs/
35	Declaration of working period time to claim workers insurance	<ul style="list-style-type: none"> ▪ Article 1 and Article 2 of Law nr. 346 from 2002, specifying Insurance for work accidents and professional diseases. ▪ Chapter VI, Section 2, Article 30, Law nr. 319 from 2006 – Work security and health
36	Emergency response plan of Silvador and Romanian regulation	<ul style="list-style-type: none"> ▪ Folder 36 - Silvador Emergency Plan full EN .pdf, Dated: 22-07-2020. ▪ First aid personnel – Certificates.pdf
37	FSC Manual: Specifying avoiding usage of chemical substances	<ul style="list-style-type: none"> ▪ FSC Manual - chemical substances.pdf
38	Law for Occupational Health and Safety, (Dated 11 th October 2006) Workers Compensation Act [RSBC 1996] Chapter 492	<ul style="list-style-type: none"> ▪ OHS Law 1425_2006.pdf. https://www.inspectiamuncii.ro/86 ▪ https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/19001_02
39	Social Dialogue law (Dated 19 th December 2022)	<ul style="list-style-type: none"> ▪ Social Dialogue Law (SVD).pdf
40	Labour Code of Romania	<ul style="list-style-type: none"> ▪ Labour Code of Romania.pdf ▪ https://www.ilo.org/dyn/travail/docs/1630/
41	Procedures for designation of conservation areas (10%) and excluded from commercial purchases (5%)	<ul style="list-style-type: none"> ▪ P 623 v1.0 Dated, 01.07.2017: Procedure for Designating Conservation Areas (10%).pdf ▪ Records of the management plots classified as representative samples of natural ecosystems (10%).xlsx

42	Procedures for Forest Management Certification	<ul style="list-style-type: none"> Specific procedures for implementing forestry management - FSC certification.pdf
43	General requirements for FSC accredited certification bodies	<ul style="list-style-type: none"> General Requirements for FSC Accredited Certification Bodies FSC-STD-20-001-V4-0 EN 2015.pdf
44	FSC Forest Management Certification surveillance Report	<ul style="list-style-type: none"> OS Ever Green FSC FM Audit 21 ENG public.pdf
45	Drone Aerial Footage of Representative natural ecosystems recorded during onsite	<ul style="list-style-type: none"> UP I Constantinescu (110 A) - 10%FSC.MOV
46	Drone footage of project area	<ul style="list-style-type: none"> DJI_0215.MOV
47	Fire and Pest management of forests under project from FSC and FMP procedures	<ul style="list-style-type: none"> Section 4.6 of Forestry Management Plan, Ocolul Silvic Ever Green-Forest Management Certification.pdf Section 2 of Silvador specific documentation for emergency situations: Silvador Emergency plan - page 4.pdf Action plan in emergency situations and response capacity: Silvador Emergency Plan.pdf Pg 1-2 of "SOP_EVERGREEN EN v2 - FMC Certification".pdf Indicator 10.6. of FSC Forest Management Certification Manual, v4.0 Dated, 17th November 2021: Manual_certificare_forestiera_EG_V4 pages 72 - 73.pdf
48	Harvest information: Report from all the activities from initiation and termination of harvest activities.	<ul style="list-style-type: none"> Harvest file UP I Manesti year 2018.pdf.
49	FSC list of highly hazardous pesticides, EU, and Romanian legislation of use	<ul style="list-style-type: none"> Section 8.5 of FMP specifying "combating pests and diseases". FSC lists of highly hazardous pesticides, FSC-POL-30-001a EN: FSC-POL-30-001a V3-0 EN FSC Lists of Highly Hazardous Pesticides pages 5-8.pdf. Lists of Highly Hazardous Pesticides, FSC-POL-30-001a EN: https://connect.fsc.org/current-processes/fsc-pol-30-001a-v1-0-fsc-lists-highly-hazardous-pesticides

		<ul style="list-style-type: none"> EU Pesticides Database: https://food.ec.europa.eu/plants/pesticides/eu-pesticides-database_en The EU's chemicals strategy prohibiting the use of the most harmful chemicals: https://www.europarl.europa.eu/factsheets/en/sheet/78/chemicals-and-pesticides
50	Annual illegal felling inspection reports submitted to Forestry Guard (2015-2023)	<ul style="list-style-type: none"> Submitted Illegal Felling Report.zip
51	Prevention of Illegal felling	<ul style="list-style-type: none"> Article 51, Article 52 and Article 107 of Forestry Code Law nr. 46/2008 Forest Services Contract to guard against illegal felling: Service contract UP I Valea Tisei.pdf
52	FSC procedure and reports for illegal felling quantifications, procedures, and actions	<ul style="list-style-type: none"> Page 1-3, 3-3, Specific Procedures Implementation of Certification Management Forestry, Dated 10.08.2017: SOP_EVERGREEN EN v2 - FMC Certification.pdf Criterion 1.4 of FSC-STD-ROU-01-2017 EN Romanian NFSS.pdf FSC Management plan.pdf
53	Emissions by Harvesting and transporting operations	<ul style="list-style-type: none"> Emissions_BSL_Estimate (Feb'24).xlsx Emissions_PRJ_Estimate (Feb'24).xlsx
54	Occupational health and safety laws regarding the registering of work accidents, insurance for work accidents and professional diseases, social dialogue law.	<ul style="list-style-type: none"> Article.175 (1), Article.177 (1), Article.178 (1), Article.179, Article. 180 (1) and Article.181 of Labor Code – Law 53 from 2003: Labor Code (SVD).pdf http://www.mmuncii.ro/j33/images/Documente/MMJS/english/2018_LAW53-2003_Labour-Code.pdf Occupational Safety and Health Law no. 319/2006: OHS Law 1425_2006.pdf. http://legislatie.just.ro/Public/DetaliuDocument/73772 Social dialogue, Law 367/2022: <input type="checkbox"/> Social Dialogue Law 367 from 2022(SVD).pdf Law no. 319/2006, on work health and safety: http://legislatie.just.ro/Public/DetaliuDocument/73772

		<ul style="list-style-type: none"> ▪ Government Decision no. 1425/2006, modified by HG no.955/2010 and Government Decision no. 1242/2011, Standard Method for the implementation of Law no.319/2006: http://legislatie.just.ro/Public/DetaliuDocument/76337 ▪ Government Decision no. 1051/2006 on minimal requirements for work health and safety during the manual handling of volumes which present risks for workers, especially back injuries: http://legislatie.just.ro/Public/DetaliuDocument/74429 ▪ Government Decision no. 1146/30.08.2006 on minimal requirements for health and safety for the use of work equipment by workers: http://legislatie.just.ro/Public/DetaliuDocument/75585 ▪ Government Decision no. 1091/16.08.2006 on minimal requirements for health and safety in the workplace: http://legislatie.just.ro/Public/DetaliuDocument/74708 ▪ Government Decision no. 1048/09.08.2006 on minimal requirements for health and safety for the use of personal protective equipment by workers in the workplace: http://legislatie.just.ro/Public/DetaliuDocument/74559 ▪ Government Decision no. 300 in 02/03/2006 on minimal requirements for health and safety on temporary or mobile sites: http://legislatie.just.ro/Public/DetaliuDocument/69995
55	Global review of forest pest and diseases, 2009	<ul style="list-style-type: none"> ▪ https://www.fao.org/3/i0640e/i0640e.pdf
56	Romania Deforestation Rates & Statistics - Global Forest Watch	<ul style="list-style-type: none"> ▪ Globalforestwatch.org/
57	National Inventory Report - Romania, 2019	<ul style="list-style-type: none"> ▪ Romania. 2019 National Inventory Report (NIR) UNFCCC
58	FAO - Ecological Zones	<ul style="list-style-type: none"> ▪ FAO Ecological Zones.zip

59	Global Forest Resources Assessment, 2020	<ul style="list-style-type: none"> ▪ https://www.fao.org/3/ca9825en/CA9825EN.pdf
60	Status of Abiotic disturbance in Romania	<ul style="list-style-type: none"> ▪ Anfodillo, et al., 2008. ▪ Turbe, et al., 2012 ▪ Anfodillo, et al., 2008 ▪ Mihai, Savulescu, & Sandric, 2007 ▪ Popa, 2008
61	Status of Geological Risks in Romania	<ul style="list-style-type: none"> ▪ Pavel, Vacareanu, Arion, Aldea, & Scupin, 2021 ▪ Malek, Boerboom, & Glad, 2015 ▪ Roșca, S et.al, 2020 ▪ Codru, I.C. and Niacsu, L., 2022.
62	Ministerial Order Nr. 460/2010	<ul style="list-style-type: none"> ▪ https://legislatie.just.ro/Public/DetaliiDocument/118103
63	Ministerial Order Nr. 1039/2010	<ul style="list-style-type: none"> ▪ https://legislatie.just.ro/Public/DetaliiDocument/120652
64	Ministerial Order Nr. 1540/2011	<ul style="list-style-type: none"> ▪ https://legislatie.just.ro/Public/DetaliiDocument/129446
65	VERRA – Confirmation mail referring no public comments received	<ul style="list-style-type: none"> ▪ Fwd Verra Registry Project Review Status Change SD VISTA 4511 Silvador Climate Action. (Email-outlook)
66	Role of trees and forests in prevention of landslides and rehabilitation of landslide affected areas in Asia, Dated 2011.	<ul style="list-style-type: none"> ▪ https://www.fao.org/3/ba0126e/ba0126e00.pdf
67	FSC Forest Management Standards Certification, Dated Jan 07, 2018	<ul style="list-style-type: none"> ▪ Timestamped_FSC-C139122.pdf
68	SUMAL - Digital Wood Tracking	<ul style="list-style-type: none"> ▪ https://www.forestinnovationhubs.rosewood-network.eu/en/content/digital-wood-tracking ▪ Transport Document of wood material (EN) from forest.pdf ▪ Transport Document of wood material (EN) from warehouse.pdf
69	Anticorruption Law no. 78/2000	<ul style="list-style-type: none"> ▪ https://www.ecba.org/extdocserv/projects/ace/20160114_ACE_CountryreportRomania.pdf

70	FSC- International Generic Indicators, FSC-STD-60-004 V1-1 EN, Dated 2015	<ul style="list-style-type: none"> ▪ https://fsc.org/sites/default/files/2019-05/FSC-STD-60-004%20IGI%20with%20IFL_Indicators_Draft.pdf
71	Romanian legislations to strengthen property rights	<ul style="list-style-type: none"> ▪ Law 18/1991 (Law on Land Resources) https://www.cdep.ro/legislatie/eng/vol48eng.pdf ▪ Law 169/1997 (Amendment of Law 18/1997) ▪ Law 1/2000 (Reconstitution of the rights of owners over Agricultural and Forest lands) https://www.cdep.ro/legislatie/eng/vol48eng.pdf ▪ Law 247/2005 (Reforms in property and Justice) https://www.ccr.ro/wp-content/uploads/2021/07/studiu_en.pdf
72	Silvador worker's registry	<ul style="list-style-type: none"> ▪ Revisal Workers.pdf

1.8 Interviews

The Validation team interviewed the project team, other entities, and relevant stakeholders to gather the information regarding the following.

- The conformance of the activities with the SD VISTA Standard, v1.0, as well as other necessary requirements.
- The evidence provided to the Validation team along with the SD VISTA PD to support validation process.
- Detailed group activity supporting the outlined SDGs.

During the Validation process, the assessment team conducted interviews with the project team. The Validation team gathered the details regarding the following:

- Documentation provided to support project design, project activities, possible impacts and monitoring reports.
- Steps taken to ensure adherence to SD VISTA and other supplementary criteria.
- Planning and implementation of project activities.

Below is a list of individuals interviewed and engaged in the project. The individuals interviewed and involved in the project are listed below.

Table 3. Project participants interviewed during the Validation.

Sl. no	Name	Entity or Organization	Role of the personnel	Topic of Discussion	Date(s) of interview
A	Vlad Chitulescu	Silvador Company SRL	Project proponent	Investment decision, legal status of forest land,	31 st October

		Forest Capital SRL		conservation plan, historical scenario of the project area, Community and ecosystem benefits, Local stakeholder consultation and continuous engagement etc.	2023 to 22 nd February 2024
B	Jason Zimmermann	GreenRaise Consulting GmbH	Director	Additionality, projections of GHG emissions and reductions from Baseline as well as project scenarios	31 st October 2023 to 22 nd February 2024
C	Zoie Richards	Zimmfor Management Services Ltd.	Specialist, Forest Carbon & Management Services	Assessment of monitoring plot, IFM project development, implementation and monitoring, GIS, remote sensing, land mapping, baseline and project maps	31 st October 2023 to 22 nd February 2024
D	Dave Brown	Zimmfor Management Services Ltd.	Specialist, Forest Carbon & Management Services	IFM project development, CBM-CFS3 modelling for baseline and project scenarios, Quantification of GHG emission reduction and removals	31 st October 2023 to 22 nd February 2024
E	Marika Forge	Zimmfor Management Services Ltd.	Specialist, Forest Carbon & Management Services	IFM project development, CBM-CFS3 modelling for baseline and project scenarios, Quantification of GHG emission reduction and removals	31 st October 2023 to 22 nd February 2024
F	Bercaru Marcel	Silvador Company SRL Forest Capital SRL	Legal Counsel	Investment decision, legal status of forest land, Other Romanian legislation, conservation strategies, baseline scenario of the forest area, Local stakeholder consultation, and continuous engagement etc.	31 st October 2023 to 22 nd February 2024

G	Mihai Panutru	Silvador Company SRL	GIS analyst & Forest Engineer	Assessment of monitoring plot, IFM project development, implementation and monitoring, GIS, remote sensing, land mapping, baseline and project maps.	31 st October 2023 to 22 nd February 2024
H	Dragos Paraschiva	Silvador Company SRL	Forest Engineer	Assessment of monitoring plot, IFM project development, Historical harvest practices, management and risk mitigation strategies	31 st October 2023 to 22 nd February 2024
I	Virgil Popescu	Silvador Company SRL	Forest Acquisition	Alternative scenarios, Local stakeholder consultation and community benefits	08 th January 2024 to 13 th January 2024
J	Florea Sergiu	Forest Design	Forest Engineer	Operation of ZEB-SLAM HORIZON Lidar for DBH and Height measurement, biomass quantification, Monitoring plot inventory	10 th January 2024
K	Elena Vosciatinscaia	Silvador Company SRL	Freelancer	Silvador Climate Action website development and maintenance	08 th January 2024 to 13 th January 2024

Additionally, relevant stakeholders were interviewed during on-site visits to gather information communication of project design, risks and impacts due to implementation of the project. Details regarding the individuals interviewed, including their organization, position and interview date will be provided below.

Table 4. Stakeholder's interviewed during the Validation process

Sl. no	Name	Gender (M/F)	Entity/Organization	Role of the Personnel	Topic of Discussion	Date(s) of Interview
--------	------	--------------	---------------------	-----------------------	---------------------	----------------------

AA	Monac Emilian	M	Egger Romania SRL	Fibre board Producer	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	08/01/2024
AB	Alexandru Constantin	M	Primaria Manesti	Mayor	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	08/01/2024
AC	Stoica Mihaela	F	Primaria Valea Lunga	Counselor	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	08/01/2024
AD	Gheorghe Niculae	M	Guarda Forestiera Dambovita	Counselor	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation, Forest management, Inspection of forest areas	08/01/2024
AE	Codroiu Vasile	M	Ocolul Silvic Muntenia	Forest Ranger	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation, Forest management, Inspection of forest areas	08/01/2024

AF	Dinca Alexandru	M	Primaria Ludesti	Counselor	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	08/01/2024
AG	Andrei Gheorghe	M	Ocolul Silvic Muntenia	Forest Ranger	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation, Forest management, Inspection of forest areas	08/01/2024
AH	Murat Hacibektanglu	M	Yildiz Entegre Romania SRL	Purchasing Manager	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	08/01/2024
AI	Mincu Anca	F	ENA WOOD	Production responsible & Manager	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	08/01/2024
AJ	Edebak Erkan	M	ENA WOOD	Production responsible & Manager	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	08/01/2024

AK	Danciu Damian	M	Private FMU	Tornator	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	08/01/2024
AL	Liviu Flusca	M	Private FMU	Tornator	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	08/01/2024
AM	Stan Cristian	M	AJVPS Dambovita	Hunting Association Representative	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation, Hiking and Hunting permission	08/01/2024
AN	Ilina Stefanita	M	Ocolul Silvic Evergreen	Forest Engineer	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation, Forest management, Inspection of forest areas	08/01/2024

AO	Popa Alexandru	M	ROMSILVA, Pucioasa FMU	Forest Engineer	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation, Forest management, Inspection of forest areas	08/01/2024
AP	Serban Constantin	M	In Colt Supermark et SRL	Wood trader and Processor	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	08/01/2024
AQ	Stanciu Vlad	M	Meladvita SRL	Bee Keeper	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	08/01/2024
AR	Dumitra Silviu	M	Timber Real Wood SRL	Manager	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	08/01/2024
AS	Nicu Barbulescu	M	Ocolul Silvic Muntenia	Manager	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	08/01/2024

AT	Neagu Alin	M	Ocolul Silvic Muntenia	Forest Engineer	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation, Forest management, Inspection of forest areas	08/01/2024
AU	Tudor Alin	M	KRONOSPAN	Purchasing Responsible	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	08/01/2024
AV	Serban Tudor	M	Preffered by Nature	Auditor	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation, FSC Inspection and Certification	08/01/2024
AW	Mihail Caradaica	M	Tomorrow's Forest Foundation	Executive Director	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	08/01/2024
AX	Jipa Daniela	F	Primaria Vernesti	Environmental Operator	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	10/01/2024

AY	Mitrache Ciprian	M	Primaria Vernesti	Cashier	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	10/01/2024
AZ	Jipa Daniel	M	Primaria Vernesti	Financial Inspector	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	10/01/2024
BA	Ionita Mircea	M	Primaria Vernesti	Land Inspector	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	10/01/2024
BB	Nanescu ION	M	Private Winery	Winery Owner	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	10/01/2024
BC	Enescu Felix	M	Even Green	Forest Ranger	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation, Forest management, Inspection of forest areas	10/01/2024

BD	Petre Cristinel Bogdan	M	Tisau Town Hall	Public Acquisitions	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	11/01/2024
BE	Ene Elena Andreea	F	Tisau Town Hall	Social Inspector	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	11/01/2024
BF	Stanciu Elena	F	Tisau Town Hall	Medical Assistant	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	11/01/2024
BG	Mocanu Viorica	F	Tisau Town Hall	General Secretary of Village	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	11/01/2024
BH	Lencaru Corina Mihaela	F	Tisau Town Hall	Land Management Inspector	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	11/01/2024
BI	Andrei Carmen	F	Tisau Town Hall	Documents & Archive	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	11/01/2024

BJ	Diaconu Mariana	F	Tisau Town Hall	Registry Referent	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	11/01/2024
BK	Dragomir Steluta	F	Tisau Town Hall	Documents & Archive	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	11/01/2024
BL	Marina Roxana Elena	F	Tisau Town Hall	H.R. Counsel	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	11/01/2024
BM	Oprea Daniela Luminita	F	Tisau Town Hall	Inspector for Marital Status	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	11/01/2024
BN	Raducanu Adrian	M	Silvador Company Firewood Warehouse	Warehouse and harvesting operations Manager	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	12/01/2024
BO	Raducanu Valentin	M	Silvador Company Firewood Warehouse	Warehouse Manager	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation, Job security	12/01/2024

BP	Manta Vasile	M	Silvador Company Firewood Warehouse	Firewood Worker	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation, Job security	12/01/2024
BQ	Dumitru Adrian	M	Silvador Company Firewood Warehouse	Skidder Operator	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation, Job security	12/01/2024
BR	Dumitru Marian	M	Silvador Company Firewood Warehouse	Chainsaw Operator	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation, Job security	12/01/2024
BS	Brutaru Georgian	M	Firewood Buyer	Firewood Buyer	Awareness of project design, Impacts due to project implementation, Initial Stakeholder consultation	12/01/2024

1.9 Site Inspections

The Validation team conducted onsite inspections for the SD VISTA project combined with the VCS project from 8th January 2024 to 13th January 2024. The purpose and details of the on-site visit is described as follows:

- An onsite audit involving a reviewing of Company registration, Forest Management Plans, FSC certification, extent of project area^{46/} and other supporting documents was conducted in Silvador company SRL office, Targoviste, located in the County of Dambovita, Romania
- Biomass inventory was conducted using ZEB-SLAM HORIZON Lidar technology in selected monitoring plots, calibrated with manual inventory data for quantification of GHG reduction and removals. The monitoring plots were located in the Buzau and Dambovita Counties of Romania.

- Discussions with forest management companies (FMCs) regarding forest management, regular meeting with stakeholders, inspection of illegal felling etc during interviews in Targoviste and in Vernesti, at the Casa Padurarului, and the community center in Vernesti.
- Compliance checks were carried out on marked trees and wood tracking was monitored using a digital portal (SUMAL 2.0, <https://www.mmediu.ro/categorie/sumal-2-0/321>).
- Visit to FSC Certified Forest areas and designated representative natural ecosystems by FSC Forest Management Standard in Tisau, Buzau county,
- Visit to Sawmills and Firewood warehouse to discuss with the workers which is located north-east of Targoviste in Ulmi, Dambovita County.
- Interviews were conducted with different stakeholders' group to gather information regarding the impacts from the project implementation.
- **Table 5. Details of sample monitoring plots visited during onsite inspection.**

Sl. no	Plots/other areas	Species group	Forest Management Plan	County	Co-ordinates from center of the plot	Date of Visit
1	O3-5	Oak	Hodoba	Buzau	45° 15' 50" N 26° 39' 34" E	10 January 2024
2	S3-1	Softwood	Barbu V	Buzau	45° 12' 43" N 26° 39' 52" E	10 January 2024
3	O2-3	Oak	Popescu	Buzau	45° 9' 8" N 26° 32' 12" E	10 January 2024
4	S3-3	Softwood	Constantinescu	Buzau	45° 10' 24" N 26° 32' 42" E	11 January 2024
5	B3-10	Beech	Constantinescu	Buzau	45° 10' 7" N 26° 32' 49" E	11 January 2024
6	O3-3	Oak	Manesti	Dâmbovița	45° 51' 8" N 25° 43' 41" E	12 January 2024
7	B4-4	Beech	Valea tisei	Dâmbovița	45° 3' 1" N 25° 29' 45" E	12 January 2024
8	B2-4	Beech	Valea tisei	Dâmbovița	45° 2' 48" N 25° 28' 43" E	12 January 2024
9	Designated conservation areas	-	-	Buzau	45° 10' 16" N 26° 32' 5" E	11 January 2024

10	Wood sawmill	-	-	Dambovita	44° 51' 53" N 25° 31' 10" E	09 January 2024
11	Firewood warehouse, Ulmi	-	-	Dambovita	45° 00' 16" N 25° 38' 14" E	12 January 2024

1.10 Public Comments

Following the requirements outlined in the Sections 5.3.1 – 5.3.2 of the SD VISTA Standard, v1.0, the project was open to public comments for a period of 30 days (18th August 2023 to 17th September 2023). The Validation team reviewed the VERRA registry and confirmation email received by VERRA to affirm that the project didn't receive any comments during the specified period^{65/}.

1.11 Resolution of Findings

Whichever potential or actual discrepancies identified during the audit process were addressed through the issuance of findings. The type of findings typically issued by EPIC during validation engagement are described as follows:

- **Clarifications (CL):** Additional information is required for clarification on a specific matter.
- **Corrective action requests (CAR):** Indicates a deviation from a specific requirement, and it can only be resolved upon evidence provided that the identified issue has been corrected. Corrective action of all open CAR's is necessary before validation and verification statements can be issued.
- **Forward action requests (FAR):** Matters concerning the project implementation that need examination during upcoming verification of the project activity. These concerns should not pertain to VCS and SD VISTA requirements for registration.

The validation was aimed to address and resolve any remaining clarification and corrective action requests, along with other unresolved issues, before obtaining a positive conclusion from EPIC on the project.

During the assessment process combined on-site visit were conducted to assess Validation and Verification of SD VISTA program. Hence combined findings were raised including 2 CLs, 2 CARs and 2 FARs. All the audit findings have been closed effectively, as detailed in the Appendix A of this report, following the SD VISTA Standard, v1.0.

1.12 Forward Action Requests

The Validation team issued 2 FARs, and the detailed information is provided in the Appendix A.

2 VALIDATION FINDINGS

2.1 Summary of SDG Contributions

The validation team reviewed the information outlined in the Table 1 of the SD VISta PD, VCS PD-MR, GHG Quantification workbooks to affirm that the project is expected to contribute significantly to the three Sustainable Development Goals (SDGs) by implementation of two group activities. The details of the aforementioned is detailed below.

Group activities involved in the project.

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

Sustainable Development Goals (SDGs) associated.

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

2.2 Project Design

2.2.1 Project Objectives

The Validation team reviewed the information outlined in Section 2.1 of the SD VISta PD regarding primary objectives, FMPs and other Key documents to affirm that Silvador and manage culturally and ecologically significant forest lands in Romania. Each property is governed by a forest management plan (FMP) mandated by the Forestry Code (Law 26/1996). The project encompasses a single Project Activity Instance (PAI) spanning 1,538 hectares, comprising eight private forest parcels.

Traditionally focused on timber production, Silvador implemented forest management practices that limit regular harvesting within the project area as a forest carbon initiative. Additionally, the forest areas are certified by FSC Forest Management Standard for 62% of project lands. These certified lands mandated to undergo continual monitoring and reporting.

The objective of the project emphasizes on actively managing and protecting the forest areas in their ownership aiming to achieve benefits relating to climate, biodiversity, water and other ecosystem services. The Validation team affirmed that two group activities were implemented to achieve the significant contribution to three Sustainable development Goals (SDGs) and were detailed in the Section 2.2.2 below.

2.2.2 Project Activities

- 1. Group Activity 1 – Sustainable Forest Management:** The forest management plan (FMP)^{/23/} is a sustainable and close to nature initiative for managing forest lands in Romania. The FMP implementation and maintenance of lands includes an additional certification by recognized third-party certification by FSC Forest Management Standard (Forest Management/Chain of Custody) on forest areas owned and managed by Silvador. The certification mandates implementation of mitigation measures to safeguard water quality, biodiversity, wildlife habitat, species at risk and forests with high conservation value^{/22/}.

SDGs associated with Group Activity 1: SDG 12, SDG 13 and SDG 15

2. **Group Activity 2 - Climate Action Initiative:** “Silvador Climate Action” a VCS forest carbon credit project focuses to achieve greenhouse gas (GHG) emission reductions and removals by transition of privately owned periodic harvest forest lands to protected forest lands. The carbon credit project was enforced following the Applied Methodology VM0012 – Improved Forest Management in Temperate and Boreal Forests (LtPF), v1.2.

SDGs associated with group activity 2: SDG 13

The Validation team affirmed that the project is expected to reasonably attain the specified sustainable development objectives through the execution of group activities operated by the project team.

Table 6. Expected SDG contributions relating to both People and Their Prosperity and the Planet.

Sl. No	SDG Target	Fulfilment of targets in project lifetime	Validation team validation conclusion
1.	12.0	100% of private forest areas owned and managed by Silvador expected to voluntarily accredited and certified to FSC Forest Management Standard.	The Validation team reviewed the FSC Forest Management Standard certification pertaining to the project area. The assessment affirmed that the project implementation will achieve sustainable development contribution through Group activity 1. The SDG target 12.0 specifies the sustainable management and efficient use of natural resources anticipated to be achieved through increase in the hectares of land certified to Sustainable Forest Management Standards. This will also follow the established project level indicator “Responsible Consumption + Production” of forest.
2.	13.0	Around 343,978 tCO ₂ e sequestered by project area encompassing forests throughout the project lifetime.	The Validation team reviewed the VCS PD-MR and GHG Quantification workbooks to affirm that the project implementation will achieve sustainable development contribution through Group activity 1 and Group activity 2. The SDG target 13.0 specifies to “Take urgent action to combat climate change and its impacts”. This target will be achieved by curtailing the timber harvest leading to enhanced carbon sequestration aligning with established project level indicator “Tonnes of greenhouse gas emissions avoided or removed”/20/21/24/.
3.	15.2	Perpetuation of halted deforestation on 1,538 ha of privately owned	The Validation team reviewed the VCS PD-MR and GHG Quantification workbooks to affirm that the

	forest lands owned by Silvador for a duration of 30 years project lifetime. Approximately 265,286 m ³ of volumes of harvest is avoided during entire project lifetime.	project implementation will achieve sustainable development contribution through Group activity 1. The SDG target 15.2 specifies “Promote the implementation of sustainable management of all types of forests, halt deforestation, restore degraded forests and substantially increase afforestation and reforestation globally. This target is achieved following established SDG Indicator 15.2.1 “Progress towards sustainable forest management” ^{24/} .
--	---	--

2.2.3 Implementation Schedule

Silvador Climate Action a project considered the date of curtailing the harvest activities as a project start date (1st August 2020) ^{12/} with crediting period of 30 years (1st August 2020 to 31st July 2050). The Validation team affirms by details in Table 3. of Section 2.1.3 of PD, detailed document review, interviews with project team and relevant personnels that all the information is in conformance with requirements of SD VISta.

2.2.4 Project Proponent and Other Entities Involved in the Project

Considering “Silvador Climate Action” as a project, Silvador Capital SRL and Forest Capital SRL (Silvador) were identified as Project proponents as per information in section 2.1.4 of SD VISta PD. According to section 2.1.5 of the SD VISta PD, GreenRaise Consulting GmbH (“GreenRaise”) was considered as Authorized Representative, Implementation Partner, Project Developer for both VCS and SD VISta project. Additionally, Global Forest Support GmbH (“Global Forest”) acts as Listing Representor and Authorized Representative, Zimmfor Management Services Ltd. (“Zimmfor”) serves as Implementation Partner and Project Developer respectively. The Validation team has determined that Silvador, GreenRaise, Global Forest Support and Zimmfor (“project team”) collectively assume full responsibility for project development.

2.2.5 Project Type

The Validation team determined that the project falls within Sectoral scope 14 – Agriculture, Forestry and Other Land Uses (AFOLU). The carbon credit project is categorized as Improved Forest Management in Temperate and Boreal Forests, within Logged to protected forests (LtPF) as project activity. The project is considered as a grouped project with a single activity instance as of now and the details are described in Sections 2.1.6 and 2.3.1.1 of the SD VISta PD respectively.

2.2.6 Project Location

The Validation team reviewed the SD VISta PD, KML files of the project area, and satellite imagery from Google Earth to confirm the project's location. The project is situated in non-contiguous private forest areas spanning Buzau and Dâmbovița counties in Romania. More specific details about the location, including coordinates, are outlined in Section 2.1.7 of the SD VISta PD^{4/}.

- The project boundary is defined by coordinates 45.274769 N, 44.641421 S, 26.700656 E, and 24.957056 W (in the GCS_WGS_84 coordinate system).

- It was determined that the project consists of grouped private forest area parcels within the specified counties, forming a single Project Activity Instance (PAI) at present.
- KML files of the project areas were accessible via the VERRA Registry and were provided for audit purposes. The Validation team utilized QGIS software to observe the KML files and verify their alignment with on-site observations.
- The Validation team concluded that the project area is non-contiguous private forest lands located in Buzău and Dâmbovița counties in Romania. As of now single project activity instance is in place with the area of 1,538 hectares.

Ultimately, the Validation team confirmed that the project's location aligns with the information provided in the SD VISTA PD and deemed the provided details adequate.

2.2.7 Baseline Scenario

To evaluate the baseline scenario, the Validation team conducted a combination of reviewing the SD VISTA PD, interviews with relevant personnel and reviewing other documents relevant to VCS project activity. The evaluation process also encompasses document review^{/13/14/48/}.

The Validation team reviewed the Forest Management Plans (FMPs)^{/13/}, Harvest folders^{/48/}, information regarding the period of harvesting^{/48/}, The Romanian Forest code^{/14/} and harvest quotas to affirm that the baseline scenario is a Historical practice existed prior to project implementation. Historical practice involves conventional timber extraction from forest fund properties mandated by Forest Management Plan covering a 10-year period. Forest Management Companies (FMCs) are obligated to synchronize their harvest-related activities with the specifications outlined in the FMPs, including confirmation of harvest quotas.

Moreover, the Validation team conducted interviews with project personnel, other relevant entities, and individuals from Forest Management Companies (FMCs) and the Forest Guard to verify this information.

2.2.8 Causal Chain(s)

The SD VISTA project developed 2 distinct causal chains corresponding to each for the group activities aligned with 8 impacts outlined in Section 3.2, Section 4.2 and Appendix 1 of the SD VISTA PD. The two causal chains result in Impacts on People, their Prosperity and Planet contributing to SDG targets as mentioned in the Section 2.2.2 above. Each causal chain is directly associated with the project activity outputs and the details are as follows.

Table 7. Group activities and their impacts

Group activities	Impact	Description of Impact	Positive/Negative
GROUP ACTIVITY 1 Sustainable Management	Impact # 1	Responsible consumption of resources	Positive, Direct, Intended
	Impact # 2	Public health resource	Positive, Direct, Intended
	Impact # 3	Protection of native ecosystems/critical habitats	Positive, Direct, Intended

	Impact # 4	Support for local communities.	Positive, Intended	Direct,
	Impact # 5	Economic opportunity	Positive, unintended	Direct,
GROUP ACTIVITY 2 Climate Action Initiative	Impact # 6	Decrease in CO ₂ Emissions	Positive, Intended	Direct,
	Impact # 7	Increase in CO ₂ Sequestration	Positive, Intended	Direct,
	Impact # 8	Economic opportunity	Negative Unintended	Indirect,

The Validation team reviewed the documents and conducted interviews with relevant personnel to specify that the causal chain sequence pertaining to the project is appropriate according to SD VISta requirements. The project team identified all the relevant impacts in the causal chain due to implementation of the project activity and allocated the impacts appropriately to respective categories.

2.2.9 Threats to the Project

The Validation team evaluated the potential risk posed by project activities to Sustainable Development Contributions throughout the entire project crediting period. This assessment involved review of the SD VISta PD, research articles, National databases^{/60/61/59/}, along with validating and verifying the associated VCS project documentation. To support the evaluation the Validation team also conducted interviews with stakeholders and project proponent.

Based on the information collected from the SD VISta PD and other supporting documents the Sustainable benefits risks and their mitigation measures are in place including voluntary and legally ensured commitments along with actions aimed to achieve Sustainable Forest Management. Considering the information from the forest-based sector (<https://www.forestplatform.org/forest-based-sector-in-romania>) Romania has a long tradition in the sustainable and close-to-nature-type management(natural regeneration) of its forest resources.

Additionally, it was confirmed that natural and human induced threats and their mitigation measures are identified in specific to project by referring Table 5: Threats to sustainable development benefits in the SD VISta PD ^{/2/16/47/50/51/52//56/57/}.

2.2.10 Benefit Permanence

The Validation team reviewed the Forest Management plans^{/13/}, Reviewed information regarding forest^{/66/} based sector in Romania (<https://www.forestplatform.org/forest-based-sector-in-romania>) and conducted interviews with personnel of FMCs hired by Silvador for forestry management plan and assessments and works on their project lands (Oculul Silvic Evergreen and Oculul Silvic Muntenia)^{/AE/AG/AN/AO/AT/BC/}. It is evident from the aforementioned, that the Romanian forest management plans are created after an environmental assessment and have a long tradition in the sustainable and close-to-nature-type management (natural regeneration) of its forest resources even without the project implementation.

Additionally, >62% of the project area is voluntary FSC Forest management Certified, hence under certification principles, the PP intends to prevent usage of chemical substances and to exclude from

using FSC forbidden substances^{/37/49/}, prevention from fire and pest^{/47/55/}, identify and manage designated natural ecosystems for conservation with no intervention^{/41/45/}.

The audit team affirmed that both voluntary and legal measures are implemented and expected to be implemented to ensure the continual commitments and activities to achieve sustainable forest management and project activities^{/67/}.

2.3 Stakeholder Engagement

2.3.1 Stakeholder Identification

The evaluation of the stakeholder identification process involved a combination of reviewing the SD VISta PD, reviewing the SOP, conducting interviews with the project team and relevant stakeholders and any supporting documents from the VCS project validation and verification.

The Validation team examined the GreenRaise GHG - Stakeholder Consultation + Engagement Standard Operating Procedure (SOP)^{/18/} and concluded that the local stakeholder identification process adhered to the specified criteria.

In conclusion, stakeholders residing within a 20-kilometer radius of the project area were identified to fulfil the requirements of the VCS Non-Permanence Risk Tool. These stakeholders represent various groups including economic, social, environmental, forest agency, and research institute/university entities. They were further classified based on criteria such as income, livelihood, well-being, and cultural values. Stakeholders who expressed interest but were not significantly impacted by the project were excluded^{/18/}.

The proponent categorized potential project-affected individuals to ensure a comprehensive representation of potential stakeholders, including national, county, and local levels. Stakeholder contacts were chosen to encompass a variety of organization sizes and geographic areas relevant to forest management. The purpose was to gather digital contact information, particularly email addresses, to simplify consultation and information sharing. Stakeholders were grouped into economic, social, environmental, and forest agency categories to ensure a diverse representation across all relevant groups.

The Validation team affirmed that the project proponent correctly identified stakeholders, as demonstrated in Section 2.2.1 of the SD VISta PD. This affirmation was based on interviews conducted with project personnel throughout the process and with relevant stakeholders during on-site visits. VVB provided a list of stakeholders identified in the project activity for evaluation^{/19/}.

2.3.2 Stakeholder Description

The Validation team reviewed the GreenRaise stakeholder consultation SOP for stakeholders' identification, reviewed the SD VISta PD and other supporting documents of the VCS project, and conducted interviews with the project proponent.

The identified stakeholder groups and their relevance to the project are as follows:

Male: This group comprises individuals who are or could potentially be employed by the project proponent, both directly and indirectly.

Female: Individuals in this group are or could potentially be employed by the project proponent, directly or indirectly.

Gender (un/non-defined): This group includes individuals of un/non-defined gender who are or could potentially be employed by the project proponent, either directly or indirectly.

Forestry Contractor (Direct): This group consists of direct forestry contractors who are currently employed by the project proponent.

Forestry Contractor (Indirect): Indirect forestry contractors in this group are not currently employed by the project proponent but could potentially be employed in the future or have been employed in the past.

Following the information outlined in the Section 2.2.2 of the SD VISTA PD, the Validation team conducted interviews with stakeholders^{/AA-BS/} and affirmed that the provided categorization of stakeholder groups and allocation of each stakeholder to respective groups was appropriate^{/18/19/}. Additionally, the validation team reviewed the national population statistics on workforce to affirm that the major proportion of workers in forestry sector is male^{/34/}.

2.3.3 Stakeholder Consultation

The Validation team reviewed the SD VISTA PD and conducted interviews with both the project team and relevant stakeholders to ensure that the project proponent conducted local stakeholder consultations in accordance with Sections 2.2.4 to 2.2.17 of the SD VISTA Standard v1.0. Here are the additional details regarding the events and audit conclusions:

- Initially, interviews were held with personnel from Silvador and GreenRaise to verify the content and focus of the Local Stakeholder Consultation. Discussions also covered the timing and methods of communication regarding in-person meetings.
- The team reviewed the email notifications sent to inform relevant stakeholders about the Local Stakeholder Consultation. The consultation occurred through electronic documents delivered via email and in-person meetings held on November 28th and 29th, 2022, respectively, at the town halls of Dâmbovița and Prahova counties. Attendance lists from these consultations were reviewed.
- Interviews were conducted with representative stakeholders from various categories and geographical regions during on-site visits. Feedback received indicated that stakeholders were well-informed about the project design, implementation activities, associated risks, costs, benefits, and relevant laws and regulations.
- Additionally, a follow-up Local Stakeholder Consultation was conducted on February 16th, 2024, at the Silvador office in Targoviste. The Validation team were invited to attend the virtual meeting. Approximately 60 individual stakeholders were invited, and attendance records were reviewed.

Throughout the consultation process, no negative comments were received. Stakeholders provided positive feedback on the project implementation, highlighting increased benefits resulting from the project. Overall, the Validation team concludes through various means that the stakeholder consultation process is found to be satisfactory.

2.3.4 Continued Consultation and Adaptive Management

The Validation team conducted evaluation through reviewing the SD VISTA PD, examining consultation database (<https://green-raise.com/>), Grievance Redress Procedure – SOP^{/17/}, reviewing documents of VCS validation and verification of the project to evaluate the effectiveness of the continuous

communication with stakeholders. In addition, we conducted interviews with project proponent and relevant stakeholders to conclude the same^{/A-1/}.

Silvador intends to maintain ongoing and transparent communication through online feedback forms that remain accessible to the public solely for the duration of the project, allowing for the perpetuation of stakeholder engagement. Project proponent agrees that, if necessary, throughout the life of the project, any necessary information that is supposed to be communicated to stakeholders will follow the electronic correspondence via email and the information will also be updated via the GreenRaise and Silvador websites. Additionally, project proponent agrees to host periodic open house meeting in neutral locations if information is not effectively reaching stakeholders.

The Validation team verified the online feedback database and the availability of connection to communicate through the database in the geographical area. The Validation team concluded that the project proponent's plan for continuous stakeholder consultation and adaptive management is satisfactory.

2.3.5 Anti-Discrimination

The entities involved in the project design and implementation of activities are as follows:

- Silvador Company SRL
- Forest Capital SRL
- GreenRaise Consulting GmbH
- Global Forest Support GmbH
- Zimmfor Management Services Ltd.

The validation team interviewed employees from these entities regarding their roles in project design, implementation and associated benefits, including anti-discrimination measures. Additionally, the team reviewed national legislation, internal standards and operating procedures for all parties involved and found these measures to be satisfactory. The following details describes the relevant national legislative measures, internal standard operating procedures and disciplinary actions applicable to the project entities, with a focus on the PP, since the project is implemented in Romania.

Every group activity implemented follows the local and national requirements for the employees working within the project. The Validation team reviewed compliance with Romanian Government Ordinance no. 137/2000, which ensures protection against discrimination, harassment, and victimization of all the employees regardless of their status. Employees and contractors employed by project proponent were safeguarded by regulatory frameworks such as National Labor Code, Law on Occupational Health and Safety and other relevant government Mandates.

The Validation team confirmed the implementation of various measures by the PP including Chapter 5 of the Internal policy of Silvador^{/31/} ensuring protection and disciplinary actions regarding harassment and discrimination in workplace. Considering their gender or race. In addition, the validation team reviewed the Romanian Labor Code governs labor relations, jurisdiction, and control, ensuring freedom of labor, prohibiting forced labor and discrimination, and mandating equal treatment for all workers^{/33/40/}.

- Equal opportunities legislation in Romania addresses multiple forms of discrimination, including gender and race, aiming to promote fairness and equality in employment^{/33/}.
- International Labour Standards advocate for equality of opportunity and treatment in employment globally, combating discrimination and promoting diversity, training access, and equitable economic distribution^{/33/}.

- Romania, an ILO member since 1919, received ILO assistance from 1993 to 2008, focusing on labor market reforms, legislative revisions, and social dialogue promotion. Post-EU accession, the ILO continued supporting labor legislation and dispute resolution, with Romania also funding social security projects in Moldova^{/33/}.

All entities involved in the project are governed by national anti-discrimination laws and adhere to internally developed policies that promote a safe work environment and uphold human dignity. These policies include provisions to protect workers from harassment and discrimination, ensuring that any such incidents are appropriately addressed if they occur.

2.3.6 Worker Training

The Validation team reviewed the SD VISta PD, and relevant documentation, and conducted interviews with the project proponent and stakeholders to determine that the project proponent ensures that all new employees receive training and technical proficiency, and prioritizes worker safety. All the information communicated to employees are aligned to Silvador's internal Field Operating Procedures and with the Occupational Health and Safety (OHS) Management System before undertaking any tasks in the forests^{/27/28/38/54/}. When required, Silvador's training content is expected to be tailored to marginalized and /or vulnerable people through the use of visual aids, translation services, or traditional translations.

The assessment team examined the records of inspection by labour inspectorate of the Dâmbovița County. This includes inspection of work safety and health in the companies that have the main activity of harvesting^{/39/}. The Validation team examined the Romanian law regarding the Declaration of working period time to obtain workers' insurance. These regulations specify the insurance for labour accidents and professional illness, General obligation, Protective and preventive services for workers, firefighting and first aid, training of workers and health surveillance^{/35/}.

Additionally, Records of Inspection by labour inspectorate of the Dâmbovița County were reviewed by the assessment team. This includes inspection regarding work safety and health within the companies that have the main activity of harvesting^{/29/}. The Validation team reviewed the Romanian legislation regarding Declaration of working period time to claim workers insurance. These legislations specify regarding the insurance against labour accidents and professional illness, General obligation, Protective and preventive services for workers, firefighting and first aid, training of workers and health surveillance^{/35/}.

The Validation team reviewed the SD VISta PD, relevant documents, conducted interviews with project proponent and stakeholders to determine that the project proponent ensures employees receive training, technical proficiency, and ensures worker safety. All the information conveyed to employees is aligned to Field Operating Procedures and Occupational Health and Safety (OHS) Management System prior to completing any tasks in the forests^{/27/28/38/54/}.

Overall, the Validation team conducted interviews with the workers^{/BN/BO/BP/BQ/BR/} during the onsite visit to affirm that the worker training provided by the project proponent is satisfactory. Additionally, the team confirms that the implemented measures to prevent workplace discrimination or sexual harassment are sufficient.

2.3.7 Equal Work Opportunities

The Validation team discussed with the project proponent and affirmed that it is not expected in the project condition that enormous job opportunities are generated or available. However, the usual procedures for employment under Silvador includes publicly posting the role of job as well as on

newspaper sites or hiring platforms, underlining the description of position including the job requirements. The candidates will be screened based on their equivalent qualification and skills, afterwards will be invited for in person interview to the position offered^{/30/31/32/}.

The Validation team affirms that the procedures for employment were not discriminatory or involves biasness. Despite that, the hiring process will be conducted based on skills and relevant experience in the specified role.

2.3.8 Workers' Rights

The employees under Silvaror ensured the workers' rights meeting all legal requirements specified under core Labor Conventions of the International Labor Organization (ILO), the ILO code on occupational health and safety for forest activities including requirements of the National Labor Code of Romania as well^{/33/39/}.

The Validation team reviewed the worker contracts to validate the worker rights. The rights of workers were detailed including the right for work safety, right for equal opportunities, right to pay for the work done, right to professional training and right to weekly or daily rest. The assessment team conducted interviews with employees^{/BN/BO/BP/BQ/BR/} that workers' rights were supported through communication during on-going safety and work training programs^{/33/40/}.

Additionally, considering the Romanian Labour code the workers have the rights such as a) right to wage for the work carried out; b) right to daily and weekly rest period; c) right to annual leave; d) right to equal opportunities and treatment; e) right to dignity at work; f) right to health and safety at work; g) right to access to vocational training etc (<https://www.ilo.org/dyn/travail/docs/1630/>).

Conclusively, the Validation team affirms that the information of worker's rights and means of communication of their rights to workers were considered satisfactory.

2.3.9 Occupational Safety Assessment

The Validation team conducted several examination to assess a) the occupational safety assessment performed by the project and the measures planned to mitigate the risks identified in the assessment b) details of the steps taken to determine whether the project adequately informed stakeholders about risks and how to minimize such risks c) to conclude and justify whether the project's occupational safety assessment was comprehensive and the measures, where needed, will minimize risk to workers. The examination includes comprehensive review, review of documents, review the information in the SD VISTA PD, supporting documentation review of VCS project, conducted interviews with stakeholders and relevant stakeholders respectively.

The Validation team provide affirmation that associated risks due to project implementation are equivalent to the risks related to regular forestry activities within Romania. The project proponent is required to implement workplace safety measures that identify, mitigate, and inhibit potential risks through legal obligations^{/54/}. The Validation team conducted interviews with relevant stakeholders^{/BN/BO/BP/BQ/BR/} and project team ^{/G/H/} to discuss about the measures implemented to attain occupational safety. The team confirms through above mentioned steps that several programs and actions been executed related to workplace Standard Operating Procedures and Health and Safety Procedures.

The Validation team reviewed the Law for Occupational Health and Safety^{/38/}, (Dated 11th October 2006). This legislation focuses on occupational health and safety. It outlines measures for enhancing workplace safety, including prevention of risks, protection of workers' health, and accident elimination.

The law applies to both public and private sectors, encompassing employers, workers, and their representatives. It defines terms like worker, employer, and occupational accident, emphasizing the importance of prevention and personal protective equipment. Overall, it aims to ensure a safe and healthy work environment for all individuals involved in the workforce^{/36/}. Additionally, Procedures for Forest Management Certification^{/42/} and other Romanian legislations^{/54/} pertaining to occupational safety reviewed to infer that procedure for registering and resolving complaints, registration and settlement of complaints local communities' access to non-timber forest products and management system for occupational health and safety etc.

2.3.10 Feedback and Grievance Redress Procedure

The Validation team reviewed the PD, supporting documents related to VCS project, conducted interviews with project proponent and local stakeholders to assess or evaluate the feedback and grievance redress procedure employed during the project^{/16/}.

The Validation team reviewed the grievance redress website and affirmed that the project proponent has organized a database for feedback and grievance redress information directly accessible to public through GreenRaise website (www.green-raise.com). Overall, the Validation team affirms that satisfactory actions have been initiated by the project proponent to admit for a transparent and solution-based procedure.

2.3.11 Feedback and Grievance Redress Procedure Accessibility

The Validation team conducted several assessments to evaluate a) The steps taken to assess the project's efforts to publicize its grievance redress procedure and how the project will document and made publicly available b) details of documentation assessed and observations made during the site visit c) Conclude and justify whether the project's feedback and grievance redress procedure is accessible to stakeholders. The aforementioned were evaluated by comprehensive review of the SD VISta PD, other supporting documents of VCS project, interviews with project proponent and relevant stakeholders to provide with conclusion.

The Validation team reviewed the grievance redress website and discussed with the project team to affirm that project proponent granted access to GreenRaise website (www.green-raise.com) to oversee the information in GreenRaise Grievance Redress Procedure and the Stakeholder Consultation + Engagement for processes database. The Validation team conducted interviews with the stakeholders^{/AA-BS/} to discuss the accessibility of the feedback and grievance redress database. Overall, the Validation team concludes that the project proponent has taken satisfactory measures to facilitate transparency and focused on solutions to grievance raised. The affirmation is also provided that all the stakeholders have access to the website and to provide feedback through the same for entire period of participation.

2.3.12 Stakeholder Access to Project Documentation

The Validation team conducted several assessments to evaluate a) the steps taken to assess the project's plan for making full project documentation accessible to all stakeholders as it becomes available through the project lifetime b) Justify and conclude whether the project has and will continue to make project documentation accessible to all stakeholders. The aforementioned were evaluated by comprehensive review of the SD VISta PD, other supporting documents of VCS project, interviews with project proponent and relevant stakeholders to provide with conclusion.

The Validation team reviewed the access to the SD VISta PD for stakeholders through GreenRaise website (www.green-raise.com) and VERRA Registry. The affirmation provided that the project

proponent granted the access to SD VISta PD for stakeholders through GreenRaise website as well as VERRA Registry.

2.3.13 Information to Stakeholders on Validation and Verification Process

The Validation team conducted several assessments to evaluate a) The steps taken to assess the measures implemented and communication methods used by the project to inform stakeholders of the validation and verification process b) Details of documentation assessed and observations made during the site visit c) Conclude and justify whether stakeholders had knowledge of the validation audit and are likely to know of future assessments. The aforementioned were evaluated by comprehensive review of PD, other supporting documents of VCS project, interviews with project proponent and relevant stakeholders to provide with conclusion.

The Validation team reviewed the GreenRaise website and affirms that the information of SD VISta project and its assessment has been provided to all relevant stakeholders through GreenRaise website (www.green-raise.com). Additionally, the Validation team confirmed the above information during interviews conducted with the relevant stakeholders^{/AA-BS/}. Meanwhile, the project proponent assures that the information will be available for public on the GreenRaise website during entire project lifetime.

2.4 Project Management

2.4.1 Avoidance of Corruption

The Validation team conducted several assessments to evaluate a) The steps taken to assess whether the project proponent or any other entities involved with project design or implementation are involved in any form of corruption, such as bribery, embezzlement, fraud, favouritism, cronyism, nepotism, extortion or collusion b) Conclude and justify whether the project is involved or complicit in any form of corruption. The Validation team conducted a review of the SD VISta PD, review of supporting documents related to VCS project, interviews with project proponent and local stakeholders to assess the aforementioned.

The Validation team reviewed the Land Deed documents^{/8/} and Forest Management Plans (FMPs)^{/13/} to affirm that the project proponent, Silvador is one of the legally incorporated business owners supported by property ownership documented under the National Agency for Cadastre and Real Estate Advertising as required by Law no. 7/1996. The affirmation was also provided for established Forest Management Plans (FMPs) that are subject to legal requirements for timber harvesting activities necessitates approval from forest management firms. The Romanian government^{/68/} operates a digital timber tracking system named SUMAL 2.0 (https://www.forestinnovationhubs.rosewood-network.eu/en/content/digital-wood-tracking_) to track harvested logs from the harvest site and transport of wood in the entire country^{/68/}.

The Validation team reviewed the Anticorruption Law no. 78/2000^{/69/} and anti-corruption procedure developed by project proponent describing the company commitment to prevent corruption and the document is made publicly available. Additionally, the private forest areas owned by Silvador also underwent Forest Management and Chain of Custody third party auditing by Forest Stewardship Council^{/43/67/}.

2.4.2 Statutory and Customary Rights

The Validation team conducted several assessments to evaluate a) The steps taken to assess the project's description and map of tenure, use, access and management rights to lands, territories and resources directly affected by project activities b) details of documentation assessed and observations

made during the site visit c) conclude and justify regarding the project's mapping of statutory and customary rights (or lack thereof). The Validation team evaluated the aforementioned by review of the SD VISta PD, review of relevant research articles, review of supporting documents related to VCS project, interviews with project proponent and local stakeholders.

The Validation team reviewed the FMPs^{/13/} and incorporation certificates^{/7/} of company to affirm that all the collective efforts will adhere to the applicable local, state, and national laws. All forest lands were referred to as "state" or "private" ownership. Ownership encompasses individuals, municipalities, churches including the government. The lawful authority to manage and extract timber from forest fund properties outlined under Law 46/2008 of "The Forestry Code)"^{/14/} and it is mandatory that all owners of forest properties should abide to its regulations and ministerial guidelines. Additionally, any management activities within forests should be conducted based on guidelines specified in FMPs^{/13/} and are directed by National Forest Administration – ROMSILVA (<http://www.rosilva.ro/>).

The Validation team concluded that the project delineating statutory and customary rights is considered satisfactory.

2.4.3 Recognition of Property Rights

The Validation team conducted several assessments to evaluate a) The steps taken to assess whether all property rights are recognized, respected and c) conclude and justify whether all property rights are recognized, respected and supported and whether the project is helping secure statutory rights. The aforementioned were evaluated by reviewing the SD VISta PD, other supporting documents of VCS project, conducting interviews with project proponent and relevant stakeholders to provide with conclusion.

The Validation team conducted evaluation regarding tenure practice, admission to land, management rights to land and resources through land title extracts (Land deed documents)^{/8/} from Office of Cadastres and Real Estate Publications as well as from FMPs^{/13/} of respective forest authorised by National Forest Administration. The Romanian government acknowledges and upholds these documents with relevant legislation to strengthen property rights^{/71/}.

Overall, the Validation team concluded the project proponent, Silvador admits, recognizes and supports all the property rights and the project contributes to securing statutory rights.

2.4.4 Free, Prior and Informed Consent

The Validation team conducted several assessments to evaluate a) the steps taken to assess the process by which free, prior and informed consent will be or has been obtained from those whose property rights will be or are affected by the project b) to Identify any documentation assessed, and observations made during the site visit c) conclude and justify to whether the project has respected property rights and obtained free, prior and informed consent of those whose property will be or have been affected by the project. The preceding information were evaluated through review of PD, other supporting documents of VCS project, interviews with project proponent and relevant stakeholders to provide with conclusion.

The Validation team affirmed that no inhabitants in the project area and consequently no property rights affected by the two group activities. Thereafter, it is affirmed that no individuals whose rights were affected and will not be affected in future.

Altogether, the Validation team affirmed that property rights were protected and obtained the free, prior and informed consent of those whose property will be impacted by the project activities.

2.4.5 Restitution and/or Compensation for Affected Resources

The Validation team conducted several assessments to evaluate a) the steps taken to assess whether appropriate restitution or compensation allocation to said parties occurred b) conclude and justify to whether the project has provided restitution or compensation to parties whose resources have been, or will be, negatively affected by the project.

The Validation team reviewed the ownership documents such as Land deeds, Tax invoices and Purchase sale contracts to assess the land use and resource right^{/8/9/10/}. Additionally, the assessment team conducted interviews with project team^{/A-J/} and relevant stakeholders^{/AA-BS/} to affirm that there are no negative effects from the project activity.

2.4.6 Property Rights Removal/Relocation of Property Rights Holders

The Validation team conducted several assessments to evaluate a) steps taken to assess whether project activities lead to involuntary removal or relocation of property rights holders from their lands or territories, or force rights holders to relocate activities important to their culture or livelihood b) to confirm that where any relocation of habitation or important activity occurs, it will be done so within the terms of an agreement which includes provisions for just and fair compensation and that the agreement was made with the free, prior and informed consent of those concerned c) conclude and justify to whether the project is removing property rights holders from their lands or territories. The aforementioned were evaluated by comprehensive review of PD, other supporting documents of VCS project, interviews with project proponent and relevant stakeholders^{/AA-BS/} to provide with conclusion.

The Validation team affirmed that this section is not applicable as there are no foreseen net negative effects due to implementation of project activities, and no removal or relocation will occur because of this project.

2.4.7 Identification of Illegal Activities

The Validation team conducted several assessments to evaluate a) the steps taken to assess any illegal activities identified by the project that could affect the project's impacts and the measures planned to reduce such activities b) conclude and justify to whether the project has identified all illegal activities and taken measures to ensure that project benefits do not result from illegal activities.

The Validation team reviewed that major reporting of illegal harvests has arisen in the Făgăraș Mountains and in some designated Natura 2000 sites, however project site will not intersect with any of those designated sites^{/4/15/}.

Additionally, combating illegal harvesting with revised policies, procedures, newer technologies for timber tracking like SUMAL 2.0 (<https://www.forestinnovationhubs.rosewood-network.eu/en/content/digital-wood-tracking>) is in place by authorised Government entities. Additionally, surveillance report by FMCs and annual audits by third party certification from FSC also determined minimal illegal harvesting in the area. The Validation team reviewed Inspection records and reporting memorandum of control and guard activities were sent to Forestry Guard through email^{/50/}.

By reviewing the Forestry Code (Law nr. 46/2008), the assessment team inferred that the forest owners are mandated to protect against illegal activities like tree felling and destruction. Forestry personnel are empowered and equipped with weapons for this purpose. Police units provide support for forest security. Unauthorized tree cutting from national forests is a crime, with penalties based on the damage

caused. Penalties increase if crimes involve weapons, occur at night, or in protected natural areas. Forest Services Contract of Silvador with the FMC for management purposes including guarding the forests against illegal felling were also reviewed with FSC procedure and reports for illegal felling quantification^{51/52/}.

In summary, the Validation team concluded that the project proponent has implemented adequate measures to prevent illegal activities throughout the project lifetime.

2.4.8 Ongoing Conflicts or Disputes

The Validation team conducted several assessments to evaluate a) the steps taken to assess whether any activities performed by the project could prejudice the outcome of an unresolved dispute relevant to the project b) conclude and justify regarding any ongoing or unresolved conflicts or disputes over rights to lands, territories and resources and any disputes that were resolved during the last twenty years c) to identify, discuss and justify conclusions regarding measures needed and designed to resolve conflicts or disputes. The preceding information was evaluated by comprehensive review of the SD VISta PD, review of related research articles, other supporting documents of VCS project, interviews with project proponent and relevant stakeholders^{AA-BS/} to provide with conclusion.

The Validation team reviewed the information of Land reform in Romania ([*Land reform in Romania - Wikipedia*](#)) and concluded that during the communist regime in Romania from 1947 to 1989, extensive land reforms were implemented, including the collectivization of private lands to increase agricultural output and manpower. This involved the transfer of many lands to the state or their unjust expropriation from private landowners. Subsequently, these lands were redistributed to peasants for a nominal fee.

The Validation team reviewed the information regarding Land related disputes and conflicts in Romania ([*PDF\) Land Related Disputes and Conflicts in Romania \(researchgate.net\)*](#)) and validated that following the collapse of communism in 1989, Romania experienced numerous land conflicts related to original ownership and title. The government responded by enacting legislation and regulations aimed at land restitution and compensation. These efforts included laws such as Law 18/1991 and Law 107/1996, which allowed citizens to request restitution of agricultural and forest lands. Subsequent laws, like Law 169/1997 and Law 1/2000, addressed unresolved legal disputes and introduced compensation measures. Law 247/2005 enforced reforms in field ownership and justice regarding disputes.

The Validation team affirms by the information outlined in 2.3.8 of the SD VISta PD about multiple historical land reforms took place in Romania that no current conflicts or disputes lasting from previous twenty years that will impact the consequence of the project. Additionally, the team also discussed with host country expert who is part of the audit team about ongoing conflicts or disputes and concluded that no measures required due absence of ongoing conflicts or disputes.

2.4.9 National and Local Laws and Regulations

The Validation team conducted several assessments to evaluate a) the steps taken to assess whether the project complies with all and any relevant local, regional and national laws, statutes and regulatory frameworks b) details of information sources assessed, and observations made during the site visit c) conclude and justify an overall conclusion as to whether the project complies with relevant laws. The preceding information was evaluated by comprehensive review of the SD VISta PD, review of related research articles, other supporting documents of VCS project, interviews with project proponent and relevant stakeholders to provide with conclusion. (Also refer to Table 7 of the VCS Validation and Verification report)

Sl.no	Legislation	Specifics of the Legislation	Validation team Validation and Conclusion
1	Law 46/2008 (Forestry Code)	Legislation governing all forest properties in Romania covers ownership rights, management processes, and harvest stipulations necessary for sustainable forest management and environmental practices. This includes the requirement for Forest Management Plans for forested areas larger than 10 hectares, detailing plan development specifications and ownership obligations.	The Validation team reviewed the legislation and confirmed the compliance of the project with legislation. The assessment determined that the project's activities align with the requirements outlined in the legislation. ^{/14/} .
2	Law No. 18 on Land Fund	This law establishes the land tenure system in Romania, classifying lands into categories and outlining ownership rights registration requirements. Relevant provisions include procedural aspects related to land use for agricultural and silvicultural production.	The Validation team reviewed the legislation and confirmed the compliance of the project with legislation. The assessment determined that the project's activities align with the requirements outlined in the legislation. https://legislatie.just.ro/Public/DetaliiDocument/1459
3	Ministerial Order Nr. 23/2009	This regulation outlines the security structures, organizations, and legal obligations of forestry personnel within forest management frameworks and service contracts to protect forest resources from illegal activities.	The Validation team reviewed the legislation and confirmed the compliance of the project with legislation. The assessment determined that the project's activities align with the requirements outlined in the legislation. https://legislatie.just.ro/Public/DetaliiDocument/114795
4	Ministerial Order Nr. 460/2010	This order establishes certification methodologies for developing forest management plans and outlines requirements for legal entities seeking certification for management activities.	The Validation team reviewed the legislation and confirmed the compliance of the project with legislation. The assessment determined that the project's activities align with the requirements outlined in the legislation. ^{/62/} .

5	Ministerial Order Nr. 1039/2010	This order defines approved methodologies for technical experts responsible for approving and reviewing the quality of forest management planning activities. It also sets conditions for certification of individuals creating management plans.	The Validation team reviewed the legislation and confirmed the compliance of the project with legislation. The assessment determined that the project's activities align with the requirements outlined in the legislation ^{/63/} .
6	Ministerial Order Nr. 1540/2011	This order specifies the terms, approvals, documents, permits, and collection methods for timber harvesting and transportation.	The Validation team reviewed the legislation and confirmed the compliance of the project with legislation. The assessment determined that the project's activities align with the requirements outlined in the legislation ^{/64/} .
7	Water Law No. 107/1996	Legislation regarding water resource use, water management, and associated activities, including penalties. Forestry aspects cover water conservation, soil protection, pollution control, and protected zones around natural water bodies.	The Validation team verified the legislation and adherence of the project to the requirements. The assessment concluded that the legislation aligns with the project activity. https://leap.unep.org/en/countries/ro
8	Environmental Protection Law No. 137/1995	Legal framework for the protection and regulation of activities impacting natural resources (water and land environments), enforced by the Ministry of Waters, Forests, and Environmental Protection.	The Validation team verified the legislation and adherence of the project to the requirements. The assessment concluded that the legislation aligns with the project activity. https://faolex.fao.org/docs/pdf/rom13258E.pdf
9	Law no. 319/2006, on Work Health and Safety	Legislation requiring monitoring of forest activities related to health and safety by Labor Inspectorates, ensuring safe work environments and outlining challenge procedures for safety requirement violations.	The Validation team verified the legislation and adherence of the project to the requirements. The assessment concluded that the legislation aligns with the project activity ^{/54/} .

The Validation team concluded that all the collective efforts will adhere to applicable local, state and national laws as described in the Section 2.3.9 of the SD VISta PD. Finally, the Validation team determined that the project proponent has provided enough evidence to support compliance with national and local laws and regulations.

2.4.10 Project Ownership

The Validation team conducted several assessments to identify, discuss and justify conclusions regarding evidence of project ownership in accordance with SD VISta rules in respect of project ownership. The preceding information was evaluated by comprehensive review of the SD VISta PD, review of ownership documents, other supporting documents of VCS project, interviews with project proponent.

- The Validation team confirmed the ownership of land by Salvador Company SRL and Forest Capital SRL, the project proponent, through a review of land deed documents. These documents contain essential details such as cadastral number, area, property description, sale-purchase agreement number, date of issue, real estate linear details, land registry number, municipality name, and authorization by the assistant registrar.
- The team validated these documents with the National Agency for Cadastre and Real Estate Advertising Institution. This ownership registry adheres to Law No.7 of March 13, 1996, governing cadastre and real estate advertising.
- Furthermore, the team examined tax invoices providing additional evidence of ownership by the project proponent. These invoices include details like fiscal declaration, forest owner, location, area, ownership document reference, and local town information.
- Purchase sales contracts were also reviewed to validate land ownership. These contracts outline cadastral number, area, property description, date of purchase, applicable laws, authentication conclusion, and public notary details.

2.4.11 Grouped Projects

The Validation team conducted multiple evaluations to describe a) steps taken to assess the design of the grouped project (e.g., eligibility criteria and process for expansion of grouped projects b) conclude and justify an overall conclusion as to whether the project design fulfills the requirements of the Sustainable Development Verified Impact Standard. The preceding information was evaluated by comprehensive review of the SD VISta PD, review of ownership documents, other supporting documents of VCS project, interviews with project proponent.

The Validation team concluded that the project titled “Silvador Climate Action” is a grouped project with a single project activity instance as of now. The future activity instance may be incorporated in compliance with the requirements specified in the Section Appendix 1 of SD VISta Standard v1.0.

3 BENEFITS FOR PEOPLE AND PROSPERITY

3.1.1 Condition of Stakeholders at Project Start

Stakeholders condition at the project start and information of their historical development, Stakeholder groups were described in the Section 3.1 of the SD VISta PD/^{25/26/}.

The Validation team conducted multiple evaluations to a) describe the steps taken to assess the description of stakeholder conditions at the project start b) conclude and justify an overall conclusion as to whether stakeholder descriptions are accurate and that the descriptions include the conditions at the start of the project, significant changes in the past, the diversity between and within stakeholder groups, and interactions between stakeholder groups. The aforementioned information was evaluated by comprehensive review of the SD VISta PD, review of ownership documents, other supporting documents of VCS project, interviews with project proponent.

Table 8. Validation conclusion for Stakeholders and their condition at the project start

Sl. No	Stakeholder Groups	Validation conclusion for Condition at Project Start
1	Male	The Validation team reviewed the population data from world bank website (https://data.worldbank.org/indicator/) to affirm that approximately 48% of the population in Romania is male. Additionally, discussing with project proponent and reviewing workers registry it is affirmed that 97% of workforce employed by the project proponent are male/ ^{72/} .
2	Female	The Validation team reviewed the population data from world bank website (https://data.worldbank.org/indicator/) to affirm that approximately 52% of the population in Romania is female. Additionally, discussing with project proponent and reviewing workers registry it is affirmed that 3% of workforce employed by the project proponent are female / ^{72/} .
3	Gender (un/non-defined)	The Validation team discussed with the project proponent and affirmed that he does not employ any non-binary identified, un/non-defined gendered individuals.
4	Forestry Contractor (Direct)	The Validation team conducted interviews with project proponent to affirm that 2 direct “Forestry contractors” were employed.
5	Forestry Contractor (Indirect)	The Validation team conducted interviews with project proponent to affirm that 2 indirect “Forestry contractors” were employed.

3.1.2 Expected Stakeholder Impacts

Anticipated impacts on stakeholders due to implementation of the project activity are outlined in Section 3.2 of the SD VISta PD and listed in the Section 3.1.4 below.

The Validation team involved in process of assessing these expected impacts on Sustainable Development Goals (SDGs) by reviewing the SD VISTa PD, supporting documents related to VCS project, and conducting interviews with project proponent.

Altogether, the Validation team determined that the projected impacts on stakeholders, as outlined by the project proponent are probable to happen for every stakeholder category.

3.1.3 Mitigation of Negative Impacts on Stakeholders

The Validation team involved in process of assessing a) the steps taken to assess the measures needed and designed to mitigate any negative impacts on stakeholder groups b) to include information with respect to how such measures are consistent with the precautionary principle c) whether the project will mitigate negative impacts on stakeholders.

The Validation team reviewed the causal chain outlined in the SD VISTa PD to understand the negative impacts associated with the project activities. The anticipated negative impact is inferred as potential job loss due to project implementation. The assessment team interviewed relevant stakeholders^{BQ/BR/BS/} and determined that the identified measures to prevent negative impacts by offering alternative employment opportunities in the remainder of the forest's lands owned by project proponent is actively performed.

3.1.4 Stakeholder Monitoring Plan

Table 9. Indicators and their monitoring mechanisms

#	Objectives or indicators	Monitoring mechanisms and steps
2	FSC Indicator #4.5.1 - Local Community Relations	<p>The validation team took the following steps to assess Impact #2:</p> <p>Annual monitoring documentation from FSC surveillance and re-assessment audits, including records of stakeholder meetings.</p> <ul style="list-style-type: none"> ▪ Reviewed the SD VISTa PD ▪ Conducted interviews with FMC personnel as well as relevant stakeholders to affirm that Silvalor engaged in Identification of regions with special cultural, ecological, economic or spiritual significance to communities through frequent participation with local communities. For Target 1: The validation team discussed with personnel from FMC^{AN/} and relevant stakeholders^{AA-BS/} to affirm that Annual meetings between Evergreen Forestry Association Board of Directors and public is conducted regularly^{11/}. For Target 2: The validation team discussed with the relevant stakeholders to confirm that annual community meetings between local stakeholders is conducted^{AA-BS/}.

		<p>Additionally, during stakeholder’s interview with a Hunting association representative/^{AM/}, it was confirmed that forest conservation has improved the movement of wild animals, providing benefits for nature enthusiasts, including the opportunity to engage in recreational hunting activities.</p>
4	<p>FSC Objective #5.1.2 – Benefits from the Forest</p>	<p>The validation team assessed Impact #4 through following steps:</p> <p>Reviewed annual monitoring records of timber volumes delivered to firewood depots.</p> <ul style="list-style-type: none"> ▪ The validation team reviewed SD VISTA PD ▪ Conducted interviews with FMC personnels as well as relevant stakeholders to affirm that the Silvador promises to sustain prolonged assistance and diversification of local economies by leveraging recognized benefits and other services from ecosystem within supervised forest lands. Reviewed target volume records: More than 7 m³ of firewood were collected from local people for the purpose of house heating/^{BQ/BR/BS/}. <p>The validation team conducted stakeholder’s interview with the personnel of private winery/^{BB/} to confirm that the reduction of cold winds prevent grapes from freezing, thereby improving the quality of wine products.</p> <p>Additionally, interview with a beekeeper/^{AQ/}, it is confirmed that the production of honey is enhanced due to an increase in foraging since forest conservation.</p>
5	<p>FSC Objective #5.1.1 – Benefits from the Forest</p>	<p>The validation team assessed Impact #5 through following steps:</p> <p>Annual review of employee and contractor hire records</p> <ul style="list-style-type: none"> ▪ The validation team reviewed the SD VISTA PD ▪ Conducted interviews with employees/^{BN/BO/BP/BQ/BR/} and stakeholders/^{AA-BS/} to affirm that Silvador assures to strengthen and diversify the local economy through sustainable and efficient management of forest areas to retain or enhance long-lasting economic sustainability as well as several social and environmental benefits including the diversification of opportunities for

		<p>other forest landowners to supply timber resources to local industries, as well as the creation of long-term employment on additional forest lands.. The validation team reviewed the worker registry of Silvador to affirm that project proponent employed more than 20 employees to achieve the objective^{/72/}.</p>
8	SD VISTA – Impact #8: Economic Impact (potential job loss)	<p>The validation team assessed Impact #8 through following steps:</p> <p>Annual review of employee and contractor hire records</p> <ul style="list-style-type: none"> ▪ The validation team conducted interviews with the employees^{/BN/BO/BP/BQ/BR/} of Silvador to affirm that no potential job loss has occurred, and project proponent is expected to re-allocate forestry contractors to other forest areas (as a mitigation measure). ▪ The validation team reviewed Silvador’s employment records for assessment.

The Validation team conducted several assessments to evaluate the steps taken to evaluate the monitoring plan used to track the project’s objectives, including the types of measurements, the sampling methods and the frequency of monitoring and reporting. The aforementioned information was evaluated by comprehensive review of the SD VISTA PD, review of ownership documents, other supporting documents of VCS project, interviews with project proponent. Additionally, the Validation team also reviewed FSC - International Generic Indicators^{/70/} to ensure that outlined objectives and indicators in the SD VISTA PD aligns with FSC requirements. This also includes confirming that the selected monitoring indicators or objectives are relevant to SD VISTA project.

The Validation team affirmed that the indicators and objectives chosen by the project proponent directly corresponds to the project objectives (Section 2.2.1 above) and anticipated impacts outlined in the project’s causal chain related to stakeholder wellbeing (Section 2.2.8 above). Furthermore, the Validation team verified the impacts listed associated with each stakeholder group identified with each stakeholder group identified (Section 3.1 of the SD VISTA PD).

Overall, the Validation team concluded that the monitoring plan outlined in the SD VISTA PD is appropriate, accurate and will allow the effective monitoring of impacts on stakeholder wellbeing.

3.1.5 Net Positive Stakeholder Wellbeing Impacts

Expected changes regarding stakeholder well-being by the implementation of the project activity are described in section 3.4 of the SD VISTA PD.

The Validation team conducted several assessments to a) evaluate the steps taken to assess the anticipated changes to stakeholder wellbeing due to project activities b) conclude whether the anticipated net impacts of the project activities are likely to be positive for each stakeholder group. The

aforementioned information was evaluated by comprehensive review of the SD VISTA PD, review of ownership documents, other supporting documents of VCS project, interviews with project proponents and relevant stakeholders^{/AA-BS/}.

Finally, the Validation team concluded that the project offers net positive impacts on stakeholders as only one possible negative impact is expected due to implementation of project activity (Refer section 3.4 of the SD VISTA PD).

4 BENEFITS FOR THE PLANET

4.1.1 Condition of Natural Capital and Ecosystem Services at Project Start

The Validation team conducted multiple assessments to evaluate a) the steps taken to assess the description of the conditions of natural capital and ecosystem services at the project start and b) conclude and justify whether the description of natural capital and ecosystem services is accurate and includes real and possible threats, key assumptions, rationale and methodological choices used. The aforementioned information was evaluated by comprehensive review of the SD VISta PD, review of FMP documents, relevant literature studies, other supporting documents of VCS project and interviews with project proponent^{13/}.

The Validation team reviewed the SD VISta PD, respective FMP and KML files to affirm that the project area is a forest area across the counties of Buzău and Dâmbovița in Romania. The Validation team reviewed the information from Food and Agriculture Organization of the United Nations (FAO) - Global Forest Resources Assessments - Global Ecological Zone Mapping to confirm that the forest lands falls within the Temperate Coniferous Forest Global Ecological Zone, as defined by the FAO of the United Nations in 2001.

Romania's landscape (<https://www.fao.org/3/AD744E/AD744E11.htm>) is characterized by roughly one-third mountainous terrain dominated by the Carpathian Mountains, another third covered by forests, and the remaining third comprising hills and plains. The climate is temperate continental, with distinct seasons and average annual temperatures ranging from 8-11°C for lows and mid-20s°C for highs. Annual rainfall averages around 650mm, and the soils are generally fertile, supporting diverse forest compositions and wildlife populations. Forests typically exhibit multi-structured characteristics, with prominent species including beech, oak, pine, and spruce respectively (<https://www.fao.org/3/cb0052en/cb0052en.pdf>).

The Validation team reviewed the Company incorporation certificate, respective FMPs and ownership documents to affirm that the project proponent operates approximately 3,400 hectares of privately owned forests. Their forest management plans comply with stringent government regulations for private lands, governed by Law 46/2008, The Forestry Code.

Table 10. Validation conclusion on Condition of Natural Capital and Ecosystem Services at Project Start

Natural Capital/ Ecosystem Service	Condition prior to project start and Potential Threats	Validation Conclusion
Forest Ecosystems	The management objectives focus on preserving soil fertility, preventing erosion, maintaining diverse forest ecosystems, safeguarding water and	The Validation and Verification reviewed the information outlined in the FMP ^{13/} , The Forestry code ^{14/} , and information of forest based sector in

	<p>riparian areas, sustainably optimizing industrial wood products, and managing non-wood resources for local communities. Threats include non-adherence to management prescriptions, climate change-related issues such as industrial pollution and habitat degradation from extreme weather events, as well as challenges posed by pests, diseases, fires, and invasive species.</p>	<p>Romania (https://www.forestplatform.org/forest-based-sector-in-romania) to affirm that the forest areas managed under FMPs are mandated to close to nature management practices.</p>
CO ₂ Emissions	<p>Limited National strategies for combating GHG emissions</p>	<p>The Validation team affirm that the information is appropriate</p>
Critical Wildlife Habitat	<p>Protected site locations are accessible through both the Ministry of Environment and Water and Forests website. Managed lands undergo comparison with identified sites to ensure no overlaps with natural protected areas, verified through field assessments. Habitat areas are managed in compliance with legal requirements, with employees conducting on-site environmental assessments before harvesting. Threats include illegal harvesting and poaching, as well as non-adherence to management prescriptions. Challenges also arise from staff lacking proper training in habitat identification, potentially leading to misidentification or failure to recognize critical wildlife habitats.</p>	<p>The Validation team reviewed the information outlined in the FMPs^{13/}, PD and GIS analysis using KML files of protected sites and project area^{4/5/} to affirm that the project area doesn't overlap with natural protected areas.</p>
Forests with High Conservation Values	<p>Forests with significant conservation values are designated as special sites at both national and regional levels. Management adheres to legal requirements and environmental protection laws, with employees conducting field assessments before initiating any activities and</p>	<p>The Validation team reviewed the information outlined regarding Identification, management, and monitoring of forests of high conservation value for the purpose of forest management certification by Ocolul Silvic Evergreen. Regarding the aforementioned the assessment team</p>

	implementing prescribed management objectives. Threats include non-compliance with management guidelines, illegal harvesting, and risks from pests and diseases.	reviewed the document “Assessment of high value forest by conservation”, Dated, 18 November 2021 to affirm the provided information is appropriate ^{/22/} to affirm that the provided information is appropriate.
Forest Health	Management strategies aim to foster healthy forests through sanitation and thinning practices to sustain a dynamic forest structure. Stands undergo natural and artificial regeneration, prioritizing hygiene cuts to eliminate damaged or diseased trees, enhancing phytosanitary conditions, and fostering resilience against wind and heavy snow loads. Threats include outbreaks of pests and diseases, as well as impacts from extreme weather events like droughts, winds, and heavy rainfall. Delayed responses to mitigate disease or pest impacts also pose risks.	The Validation and Verification reviewed the information outlined in FMP ^{/13/} as well as fire and pest management plans ^{/47/} to affirm that the management involves protection and prevention of forests from adverse impacts.

The Validation team affirms as per information outlined in Section 4.1 of the PD that the Natural capital or ecosystem service, their condition prior to project start and potential threats is determined specific to project area as well as accurate.

4.1.2 Expected Impacts on Natural Capital and Ecosystem Services

The Validation team conducted multiple assessments to evaluate a) the steps taken to assess the expected impacts on natural capital and ecosystem services resulting from project activities b) conclude and justify whether the expected impacts identified in the project description are likely to occur. The aforementioned information was evaluated by comprehensive review of SD VISTA PD, review of FMP documents, relevant literature studies, other supporting documents of VCS project and interviews with project proponent.

Table 11. Validation conclusion on Expected Impacts on Natural Capital and Ecosystem Services

Impact	Validation conclusion on Resulting Change in Condition
Impact #1: Responsible Consumption of Resources	<p>The Validation team reviewed the FMPs, SD VISTA PD and VCS PD-MR to assess the project activity and affirm that the activity will yield positive benefits on forest ecosystems.</p> <p>The assessment team confirms that the implementation of project activity will lead to sustainable management of forest resources and ecosystems achieving benefits such as protection</p>

	of natural communities, reduction in conversion of forests and enhanced forest biomass due to deferral of harvest operations.
Impact #3: Protection of Native Ecosystems and Critical Habitats	<p>The Validation team reviewed the FMPs, SD VISTA PD, VCS PD-MR and FSC Forest management Standard Certification to assess the Impact#3. The assessment reveals that the activity will lead to contribution of positive benefits to Native Ecosystems and Critical Habitats.</p> <p>The Validation team affirms that the designation of representative natural ecosystem (10% of Certified area) as no intervention zones for comprehensive conservation. Additionally, mitigation of possible risks by disease and pests will be performed by employing the procedures outlined in FSC Forest management Standard procedure.</p>
Impact #6: Decreased CO ₂ Emissions	<p>The Validation team reviewed the SD VISTA PD, GHG quantification workbook and VCS PD-MR to understand the project activity to assess the Impact#6. The assessment reveals that the activity will lead to contribution of positive benefits Climate by decreased CO₂ emissions.</p> <p>The Validation team affirms that the project intended to reduce CO₂ emissions from harvesting, emissions from equipment and transportation etc as the project is transition from logged to protected forest initiative^{53/58/}.</p>
Impact #7: Increase in CO ₂ Sequestration	<p>The Validation team reviewed the SD VISTA PD, GHG quantification workbook^{24/} and VCS PD-MR^{1/} to understand the project activity to assess the impact #7. The assessment reveals that the activity will lead to contribution of positive benefits to Climate by increased CO₂ sequestration.</p>

4.1.3 Mitigation of Negative Impacts on Natural Capital and Ecosystem Services

The Validation team involved in process of assessing a) the steps taken to assess the measures needed and designed to mitigate any negative impacts on natural capital and ecosystem services b) to information with respect to how such measures are consistent with the precautionary principle c) justify and conclude whether the project will mitigate negative impacts on natural capital and ecosystem services.

The validation team reviewed FMP, FSC Certificate, GHG quantification workbook, VCS PD-MR and SD VISTA PD regarding the information on Impact#1, Impact#3, Impact#6 and Impact#7. All these impacts are positive, actual, direct, and intended toward natural ecosystems and climate benefits.

The assessment team affirms that this section is not applicable, as no mitigation of negative impacts on natural capital and ecosystem services are expected because of project implementation (also refer Section 4.1.2 of this report).

4.1.4 Natural Capital and Ecosystem Services Monitoring Plan

Table 12. Indicators and their monitoring mechanisms

Impact #	Objectives or indicators	Validation conclusion on Monitoring parameters
1	FSC Indicator #5.2.3 - Benefits from the Forests	<p>The validation team assessed Impact #1 through following steps:</p> <p>Annual review of FSC surveillance/re-assessment audit documentation for lands undergoing certification and annual review of harvest records</p> <p>The validation team reviewed the FMP, Harvest quota and affirms that the Silvador’s Actual annual harvest (AAC) levels are recorded and do not exceed the allowable level of harvest established by the forest management plans for its validity period of 10 years^{/11/13/}. https://www.forestplatform.org/ Target 1: The validation team reviewed the FSC Forest Management Standard Certification and affirms that >62% of project areas were certified by FSC ^{/44/67/}. Target 2: The validation team reviewed FMP^{/13/}, Harvest quotas, conducted interviews with project proponent and personnel of FMC to ensure that 100% of project lands are within the allowable forest management quotas; none of them have exceeded the limits.</p>
3	FSC Indicator #6.5.1 - Environmental Values and Impacts	<p>The validation team assessed Impact #3 through following steps:</p> <p>Annual review of FSC surveillance/re-assessment audit documentation for protected land area representing 10% of natural ecosystems</p> <p>The validation team reviewed the FSC Forest Management Standard Certification and affirms that Silvador identified representative native ecosystems, including primary forests, marginal habitats, and self-regenerating forests for protection^{/22/41/}.</p>

		<p>Target 1: The validation team reviewed the FSC Certification for mapping and maintenance of more than 10% of representative natural ecosystems in project areas as no intervention area^{/41/45/}.</p>
6	VCS – Implementation of Improved Forest Management (IFM) project.	<p>The validation team assessed Impact #6 through following steps: Monitoring measurement is on CO2 emissions avoided in the project during the monitoring period and monitoring frequency is a minimum of once every 5 years.</p> <p>The validation team reviewed the FMP^{/13/}, VCS PD-MR^{/1/}, SD VISTA PD and GHG Quantification workbook^{/24/} to affirm that Silvador intended for the periodic generation of verified carbon units (VCUs) via verification audits by decreased CO2 Emissions^{/1/24/}.</p>
7	VCS – Implementation of Improved Forest Management (IFM) project.	<p>The validation team assessed Impact #7 through following steps: Monitoring measurement is on CO2 sequestered emissions in the project during the monitoring period and monitoring frequency is a minimum of once every 5 years up to yearly.</p> <p>The validation team reviewed the FMP, VCS PD-MR, SD VISTA PD and GHG Quantification workbook to affirm that Silvador intended for the periodic generation of verified carbon units (VCUs) via verification audits by decreased CO2 Emissions^{/1/6/24/}.</p>

The evaluation of the monitoring plan for natural capital and ecosystem services involved reviewing the PD, literature reviews, other documentation related to VCS project activity and conducted interviews with project proponent and other relevant personnels.

Additionally, the Validation team reviewed the FSC - International Generic Indicators^{/70/} to confirm alignment with the stated objectives in the PD and FSC requirements, ensuring that selected monitoring parameters are applicable to the SD VISTA project.

The Validation team concluded that the chosen monitoring parameters by the project proponent are directly tied to the project objectives and predicted outcomes. Identified in the casual chain related to natural capital and ecosystem services. The Validation team confirmed that the monitoring plan is designed effectively to tract impacts on natural capital and ecosystem services.

4.1.5 Net Positive Natural Capital and Ecosystem Services Impacts

The anticipated changes to natural capital and ecosystem services affected by the project are outlined in section 4.1.2 of this report. Steps taken to evaluate the net positive impacts on natural capital and ecosystem services involved reviewing the Project Design, FMPs^{/13/}, FSC Forest Management Standard

Certification^{/67/}, associated VCS project documentation^{/1/}. Interviews were conducted with the project proponent as well. In summary, the audit team determined that the proposed project activities are expected to yield positive outcomes and deliver substantial environmental benefits such as Responsible Consumption of Resources, Protection of Native Ecosystems and Critical Habitats, Decreased CO₂ Emissions and Increase in CO₂ Sequestration respectively.

5 VALIDATION CONCLUSION

Following the assessment of the Validation team, by reviewing VCS PD-MR, SD VISTA PD, FSC Forest Management Standard Certification, Relevant Romanian legislation, GHG Quantification workbooks it is affirmed that the project proponent possesses the necessary operational capabilities to effectively implement, manage, and monitor the SD VISTA project. This includes the integration of the SD VISTA project with a separately validated and verified VCS project. The Validation team has provided a reasonable level of assurance that the objectives outlined in Section 1.1 of the validation have been successfully achieved. As a result, it is anticipated that the project will be eligible to acquire SD VISTA claims and labels for the Sustainable Development Goals (SDGs) specified in section 1 of the report.

The data and information utilized to support the project's compliance with SD VISTA rules were a combination of assumed, projected, and historical data. Despite the nature of these data sources, the validation team has concluded that the project proponent has demonstrated the project's adherence to the validation criteria outlined in the Sustainable Development Verified Impact Standard, Version 1.0, and the SD VISTA Program Guide, Version 1.0. This conclusion includes consideration of any qualifications or limitations identified during the validation process.


Overall, the Validation team affirms that the project is in alignment with the requirements and standards set forth by SD VISTA, indicating a positive stance for its potential impact on sustainable development goals and its eligibility for SD VISTA claims and labels.

APPENDIX A: FINDINGS

Table 1. CL from the Validation and Verification for project titled “SILVADOR CLIMATE ACTION”

CL ID	01	Section no.	4.3 of SD VISTA PD, v1.1	Date:	30 th January 2024
Description of CL					
<p>Upon reviewing the information outlined in Section 4.3 of SD VISTA PD, v1.1, Dated 18th August 2023, regarding identification, mapping and maintenance of 10% of representative natural ecosystems.</p> <p>As per the requirement section 3.2.4 of SD VISTA Standard v1.0 to identify the Impacts on Planet due to implementation of the project activity, Project proponent is required to clarify whether representative natural ecosystems identified fall within the Scope of Romanian Forestry regulations or comply with the FSC Forest Management Standard (as per Indicator 6.5.5 of FSC National Forest Stewardship Standard of Romania).</p>					
Project participant response					Date: Feb 1 st 2024
<p>Project Proponent confirms information regarding identification, mapping and maintenance of 10% of the representative natural ecosystems is dictated by Indicator 6.5.5. of the FSC National Forest Stewardship Standard of Romania (FSC-STD-ROU-01-2017 EN The FSC National Forest Stewardship Standard of Romania - Version 1- 0).</p> <p>The standard can be source via the following link https://fsc.org/en/document-centre/documents/resource/275</p> <p>The project proponent follows Procedure 623 for designating conservation areas (see document Translated Procedure for Designating Conservation Areas (10%).pdf in Audit Support folder 37-FSC Evidence and below).</p> <p>Evidence of use is indicated with the FSC Performance Report (referenced below and note Auditor Share).</p>					
Documentation provided by project participant					

Procedure for Designating Conservation Areas

	Procedură pentru desemnarea zonelor de conservare (10%) și excluse de la tăieri comerciale (5%)	P 623 Ver 1/ 01.07.2017
---	--	-----------------------------------

Responsabil	Termen	Documente specifice	Revizuirea procedurii
Fond forestier	Unic / la modificare	F623, F641, F611, F531, F532, R811	la schimbarea prevederilor standardului / legislației

Asociația Ocolul Silvic Evergreen definește ca suprafețe de pădure desemnate pentru conservarea biodiversității (minim 10% din suprafața destinată certificării) acele suprafețe care au atribuite valori ridicate de conservare biodiversității.

Asociația Ocolul Silvic Evergreen definește ca suprafață exclusă de la tăieri cu scop productiv (minim 5% din suprafața destinată certificării) toate acele suprafețe în care nu se planifică activități de producție, extragerea materialului lemnos având caracter excepțional.

Desemnarea acestor două zone ține cont de următoarele criterii generale:

- Suprafețele desemnate să fie reprezentative pentru diversitatea ecosistemelor forestiere existente la nivelul grupului de certificare (*landscape level requirements*);
- Suprafețele reprezentative să fie analizate la nivelul întregii suprafețe incluse în certificare.
- Suprafețele 5% (excluse de la tăieri) și 10% (destinate conservării biodiversității) sunt identificabile pe teren și marcate pe hărți în mod distinct.

Auditor Copy of FSC Performance Report for Group NC_FM_COC_028522.xlsx

Go to Table of Contents				
Principles & Criteria Summary				
Version	V5			
Display	Index	18.01 Standard Requirement	18.02 Num CARs	18.03 Summary Assessment
		species beyond the boundary of the Management Unit, when determining the measures to be taken inside the Management Unit.		
	C6.05	The Organization shall identify and protect representative sample areas of native ecosystems and/or restore them to more natural conditions. Where representative sample areas do not exist or are insufficient, The Organization shall restore a proportion of the Management Unit to more natural conditions. The size of the areas and the measures taken for their protection or restoration, including within plantations, shall be proportionate to the conservation status and value of the ecosystems at the landscape level, and the scale, intensity and risk of management activities.	0	The FME has identified and mapped more than 10% of the area as representative ecosystems, based on procedure P65. They have included areas of strict protection, primary forest, HCVMs and other areas of natural forest, designed to cover all groups of forest types existent.

WB assessment

Date: 13th February 2024

The Verification team reviewed the indicators 6.5.5 of FSC National Forest Stewardship Standard of Romania (FSC-STD-ROU-01-2017 EN The FSC National Forest Stewardship Standard of Romania - Version 1- 0) and FSC certificate (NC-FM/COC-028522, Validity: 08/01/2018 to 07/01/2023) to confirm that representative natural ecosystems identified fall within the Scope of FSC Forest Management Standard.

The Verification team affirms that the provided information is sufficient and therefore **CL 01** is closed effectively.

CL ID	02	Section no.	4.3 of SD VISTA PD, v1.1	Date: 30 th January 2024
Description of CL				
<p>Upon reviewing the information outlined in Section 4.3 of SD VISTA PD, v1.1, Dated 18th August 2023, regarding identification, mapping and maintenance of 10% of representative natural ecosystems.</p> <p>As per the requirement section 3.2.4 of SD VISTA Standard v1.0 to identify the Impacts on Planet due to implementation of the project activity, Project proponent is required to clarify whether 10% representative natural ecosystems represent 10% of FSC Forest Management Standard certified areas or 10% of total project area.</p>				
Project participant response				Date: February 1 st 2024
<p>The Project Proponent confirms that 10% of the representative natural ecosystems described in section 4.3 of the SD VISTA PD, v1.1 represents FSC Forest Management certified areas, not 10% of the entire project area.</p>				
Documentation provided by project participant				
None required.				
VWB assessment				Date: 13 th February 2024
<p>The Verification team reviewed the FSC certificate (NC-FM/COC-028522, Validity: 08/01/2018 to 07/01/2023) provided by the project proponent and affirmed that the 10% of the representative natural ecosystems identified represents FSC Forest Management certified areas, not 10% of the entire project area.</p> <p>The Verification team affirm that the provided information is sufficient and therefore the CL 02 is closed effectively.</p>				

Table 2. CAR from the Validation and Verification for project titled “SILVADOR CLIMATE ACTION”

CAR ID	01	Section no.	1.0 and 4.3 of SD VISTA PD, v1.1	Date: 13 th February 2024
---------------	----	--------------------	----------------------------------	---

Description of CAR

The Validation and Verification team reviewed the information outlined in section 1.17.2 of PD-MR, v1.2, dated 26th October 2023, which has summarized as follows: Project proponent claims to attain SDG (Sustainable Development Goals) Target 12.2 (By 2030, achieve the sustainable management and efficient use of natural resources) according to Global indicator framework for the Sustainable Development Goals and targets of the 2030 Agenda for Sustainable Development. The current project contributions claims that 62% of the project areas owned by Silvador Company SRL are certified to the FSC Forest Management Standard.

Upon reviewing the FSC certificates (NC-FM/COC-028522, Validity: 08/01/2018 to 07/01/2023), initially recognized to have FSC Forest Management Standard certification for >62% of the project areas, the VVB noted that 0% of area owned by the Silvador Company SRL are certified to the FSC Forest Management Standard.

As per the requirement section 3.2.4 of SD VISta Standard v1.0 to identify the Impacts on Planet due to implementation of the project activity, PP is required to verify all the FSC certified project areas and provide valid justification along with supporting evidence to address the concern.

Project participant response

Date: February 1st 2024

The properties [owners] within the project activity instance that have achieved FSC certification are noted in the official FSC certification confirmation online portal ([FSC Search](#)) and noted within the publicly available FSC Audit Report (2022 FSC Forest Management Certification, 4th Surveillance Report for: Asociatia Ocolul Silvic Evergreen in Prahova, Romania; dated Feb 23, 2022). Refer to Audit Share, folder name “37-FSC Evidence”.

The sources confirm the following Silvador owned properties as FSC certified:

- UP Barbu
- UP Constinescu
- UP Hodoba
- UP Popescu

Inclusion of the above listed properties correctly claims 62% of the project areas owned by Silvador are FSC certified.

For context, during EPICs review of the recently released 2023 FSC report noted a type-o/error that omitted Silvador entities from the report. During on-site validation/verification EPIC interviewed with FSC Auditor (contract auditor to FSC certification body Preferred by Nature) who confirmed the omission was an error (and attributable to the Romanian practice of changing FMP properties names with when FMPs are approved).

Silvador has requested that FSC Certification Body correct the 2023 FSC Audit Report (note the FSC Certification Confirmation online portal continues to be accurate).

Documentation provided by project participant

Group OS Ever Green FM_COC-028522 4th Surveillance Audit (dated Feb 23, 2022 - Section 3.3.1 Certificate Scope, pg. 13

3.3 Certificate Scope

3.3.1 Scope Details¹

Forest Management Unit (FMU) and group members included in scope of certificate:

Owner (Group member) – Forest Capital with FMU - UP I Constantinescu, UP V Barbu, UP VII Popescu

Owner (Group member) – Silvador Company with FMU – I Hodoba

The following table shows the updated group certificate membership information:

FMU	Owner (Group member)	Type of ownership	Area (ha)
I Batraneni	OMSB	Private	3,543.139
	SC Domeniile Girbea SRL	Private	189.361
	Sandulescu Constantin	Private	17.4
	Duna Mihail-Iulian	Private	9.9995
	Oprea Viorel	Private	17.9995
IV Starchiojd	OMSB	Private	1,237.62
UP I Obstea Chiojdenilor	Obstea Chiojdenilor	Private	2,436.20
UP I Constantinescu	Forest Capital	Private	151.9
UP V Barbu	Forest Capital	Private	426.02
UP VII Popescu	Forest Capital	Private	198
UP I Hodoba	Silvador Company	Private	178.6675
TOTAL			8,406.307


¹ Data presented in the reports shall be in metric system units

Group Members / Sites			
ORGANIZATION	ROLE	THE CODE OF THE SITE	STATUS
Domeniile Girbea SRL	FM - Group Member	NC-FM/COC-028522-B	Valid
Forest Capital SRL	FM - Group Member	NC-FM/COC-028522-G	Valid
Mihail-Iulian Duna	FM - Group Member	NC-FM/COC-028522-D	Valid
Obstea Mosnenilor Chiojdeni	FM - Group Member	NC-FM/COC-028522-F	Valid

FSC Certification File - FSC-C139122
 Digitally signed by DigiCert Timestamp 2022 - 2
 Date: 2024.01.22 11:00:25 +00:00

Page 1 about 4

FSC CERTIFICATION RECORD



ORGANIZATION	ROLE	THE CODE OF THE SITE	STATUS
Obstea Mosnenilor Starchiojdeni si Batraneni	FM - Group Member	NC-FM/COC-028522-A	Valid
Sandulescu Constantin	FM - Group Member	NC-FM/COC-028522-C	Valid
SILVADOR COMPANY SRL	FM - Group Member	NC-FM/COC-028522-H	Valid
Viorel Oprea	FM - Group Member	NC-FM/COC-028522-E	Valid

VVB assessment
Date: 13th February 2024

The Validation and Verification team reviewed the FSC Certification documentation (NC-FM/COC-028522-H and NC-FM/COC-028522-G) and conducted interviews with the FSC Auditor during the onsite visit regarding the Corrective Action Request (CAR) raised.

Additionally, during the onsite validation/verification process, EPIC interviewed the FSC Auditor (contract auditor to FSC certification body Preferred by Nature), who confirmed that the omission was due to an error, attributed to the Romanian practice of changing FMP properties names when FMPs are approved. The VVB reviewed the FM_COC-028522 4th Surveillance Audit (dated Feb 23, 2022 - Section 3.3.1 Certificate Scope, pg. 13 to affirm that the information provided is adequate.

Subsequently, a confirmation notification provided by Ever Green Forestry Association on 21st February 2024, referring to the correction on the FSC certified areas was forwarded to the VVB as well.

Based on the information gathered, the Validation and Verification team concludes that the provided evidence is adequate, and therefore, the raised **CAR 01** has been effectively resolved.

CAR ID	02	Section no.	4.3 of SD VISTA PD, v1.1	Date: 30th January 2024
Description of CAR				
<p>The Validation and Verification team reviewed the information outlined in section 1.17.2 of PD-MR, v1.2, dated 26th October 2023, which has summarized as follows: The project claims to attain SDG (Sustainable Development Goals) Target 12.2 (By 2030, achieve the sustainable management and efficient use of natural resources) according to Global indicator framework for the Sustainable Development Goals and targets of the 2030 Agenda for Sustainable Development. The current project contributions claims that 62% of the project areas owned by Silvador Company SRL are certified to the FSC Forest Management Standard. Additionally, the no intervention areas designated as representative natural ecosystems were detailed in the certificate.</p> <p>Following the review of FSC certificates (NC-FM/COC-028522, Validity: 08/01/2018 to 07/01/2023) pertaining to the project activity instance, the VVB noted that 10% of FSC Forest Management certified areas are designated as representative natural ecosystem. Despite this designation, A forest compartment (Forest compartment - 110 D) includes secondary cuttings (Progressive cutting) as one of the harvesting activities and this activity do not meet the requirements of FSC Forest Management Standards for representative natural ecosystems.</p> <p>As per the requirement section 3.2.4 of SD VISTA Standard v1.0 to identify the Impacts on Planet due to implementation of the project activity, PP is required to verify all the FSC certified project areas, designated representative natural ecosystems and relevant certificates to provide valid justification along with supporting evidence to address the concern.</p>				
Project participant response				Date: February 1st 2024
<p>As illustrated in CAR 01, the Project Proponent has verified the FSC certified project areas (indicated as UP Barbu, UP Constinescu, UP Hodoba and UP Popescu). Evidence is provided below and included in the Auditor Share.</p> <p>The project proponent highlights the project activity is the cessation of harvesting within the designated project activity instance – there is no threat of impact to the natural ecosystems due to the implementation of the project activity. The forest management activities (i.e., harvesting) in question will not be occurring.</p>				
Documentation provided by project participant				

3.3 Certificate Scope

3.3.1 Scope Details¹

Forest Management Unit (FMU) and group members included in scope of certificate:

Owner (Group member) – Forest Capital with FMU - UP I Constantinescu, UP V Barbu, UP VII Popescu

Owner (Group member) – Silvador Company with FMU – I Hodoba

The following table shows the updated group certificate membership information:

FMU	Owner (Group member)	Type of ownership	Area (ha)
I Batraneni	OMSB	Private	3,543.139
	SC Domeniile Girbea SRL	Private	189.361
	Sandulescu Constantin	Private	17.4
	Duna Mihail-Iulian	Private	9.9995
	Oprea Viorel	Private	17.9995
IV Starchiojd	OMSB	Private	1,237.62
UP I Obstea Chiojdenilor	Obstea Chiojdenilor	Private	2,436.20
UP I Constantinescu	Forest Capital	Private	151.9
UP V Barbu	Forest Capital	Private	426.02
UP VII Popescu	Forest Capital	Private	198
UP I Hodoba	Silvador Company	Private	178.6675
TOTAL			8,406.307


¹ Data presented in the reports shall be in metric system units

Group Members / Sites			
ORGANIZATION	ROLE	THE CODE OF THE SITE	STATUS
Domeniile Girbea SRL	FM - Group Member	NC-FM/COC-028522-B	Valid
Forest Capital SRL	FM - Group Member	NC-FM/COC-028522-G	Valid
Mihail-Julian Duna	FM - Group Member	NC-FM/COC-028522-D	Valid
Obstea Mosnenilor Chiojdeni	FM - Group Member	NC-FM/COC-028522-F	Valid

FSC Certification File - FSC-C139122
Digitally signed by DigiCert Timestamp 2022 - 2
Date: 2024.01.22 11:00:25 +00:00

Page 1 about 4

FSC CERTIFICATION RECORD



ORGANIZATION	ROLE	THE CODE OF THE SITE	STATUS
Obstea Mosnenilor Starchiojdeni si Batraneni	FM - Group Member	NC-FM/COC-028522-A	Valid
Sandulescu Constantin	FM - Group Member	NC-FM/COC-028522-C	Valid
SILVADOR COMPANY SRL	FM - Group Member	NC-FM/COC-028522-H	Valid
Viorel Oprea	FM - Group Member	NC-FM/COC-028522-E	Valid

VB assessment
Date: 13th February 2024

The Validation and Verification team reviewed the FSC Certification documentation (NC-FM/COC-028522-H and NC-FM/COC-028522-G) and conducted interviews with the FSC Auditor during the onsite visit regarding the Corrective Action Request (CAR) raised.

Additionally, during the onsite validation/verification process, EPIC interviewed the FSC Auditor (contract auditor to FSC certification body Preferred by Nature), regarding this concern.

The project proponent emphasizes the process of harvesting within the designated project activity instance, there is no risk of harm to the natural ecosystems due to the implementation of the project activity. The forest management activities, particularly Harvesting, will not be occurring.

Based on the information gathered, the Validation and Verification team concludes that the provided evidence is adequate, and therefore, the raised **CAR 02** has been effectively resolved.

Table 3. FAR from the Validation and Verification for project titled "SILVADOR CLIMATE ACTION"

FAR ID	01	Section no.	1.0 of SD VISta PD, v1.1	Date: 30 th January 2024
Description of FAR				

The Validation and Verification team reviewed the information outlined in section 1.17.2 of PD-MR, v1.2, dated 26th October 2023, which has summarized as follows: Project proponent claims to attain SDG (Sustainable Development Goals) Target 12.2 (By 2030, achieve the sustainable management and efficient use of natural resources) according to Global indicator framework for the Sustainable Development Goals and targets of the 2030 Agenda for Sustainable Development. The current project contributions claim that 62% of the projects owned by Silvador Company SRL are certified to the FSC Forest Management Standard. The project proponent assures that 100% of the forest lands owned by Silvador will be certified to a recognized third-party sustainable management standard over the lifetime of the project.

The Validation and Verification team requests the upcoming VVB to verify the regions that were previously certified and those intended for certification in the upcoming verification process.

Project participant response

Date: February 1st 2024

Forward Action Request Noted.

Documentation provided by project participant

VVB assessment

Date: 13th February 2024

FAR ID

02

Section no.

1.0 of SD VISta PD, v1.1

Date: 30th January 2024

Description of FAR

As per description of section 1.0 of SD VISTA PD, v1.1, dated 18th August 2023, the project claims to The Validation and Verification team reviewed the information outlined in section 1.17.2 of PD-MR, v1.2, dated 26th October 2023, which has summarized as follows: Project proponent claims to attain SDG (Sustainable Development Goals) Target 12.2 (By 2030, achieve the sustainable management and efficient use of natural resources) according to Global indicator framework for the Sustainable Development Goals and targets of the 2030 Agenda for Sustainable Development. The current project contributions claim that 62% of the projects owned by Silvador Company SRL are certified to the FSC Forest Management Standard. The project proponent assures that 100% of the forest lands owned by Silvador will be certified to a recognized third-party sustainable management standard over the lifetime of the project. According to FSC Forest Management Standard procedures the certified areas should allocate 10% of the certified areas as representative natural ecosystems and these designated areas must refrain from any harvest related activities.

The Validation and Verification team requests the upcoming VVB to verify the representative natural ecosystems that were previously certified and those intended for certification in the upcoming verification process.

Project participant response

Date: February 1st 2024

Forward Action Request Noted.

Documentation provided by project participant

VVB assessment

Date: 13th February 2024

- 1) **Clarifications (CL):** Additional information is required for clarification on a specific matter.
- 2) **Corrective action requests (CAR):** Indicates a deviation from a specific requirement, and it can only be resolved upon evidence provided that the identified issue has been corrected. Corrective action of all open CAR's is necessary before validation and verification statements can be issued.
- 3) **Forward action requests (FAR):** Matters concerning the project implementation that need examination during upcoming verification of the project activity. These concerns should not pertain to VCS requirements for registration.

APPENDIX B: SAMPLING PLAN

Sl. no.	Identified residual risks	Assessment of the risk		Response to the risk in the validation plan and/or sampling plan
		Risk level	Justification for identified risk	
1.	Inadequate Stakeholder Identification, Consultation and Participation	Medium	Inadequate identification, consultation, and participation of stakeholders, particularly the exclusion or insufficient engagement of key stakeholders is expected to lead into misrepresented concerns or future conflicts, ultimately undermining the project's credibility and compliance.	<p>The EPIC audit team shall confirm that comprehensive and transparent stakeholder identification and consultation processes are in place, ensuring that all key stakeholders are adequately engaged during the project's implementation and operation. Verify whether best practices for stakeholder consultation are applied, and mechanisms for addressing concerns are clearly defined and implemented to prevent exclusion or oversight of significant stakeholders.</p> <p>Additionally, the audit team shall verify whether project proponents have established a feedback provision for stakeholder concerns, ensuring that issues raised are documented, addressed, and integrated into the project's adaptive management processes. This includes implementing participatory system that involve stakeholders in assessing project impacts, thereby reducing the risk of misrepresentation of stakeholder concerns or the emergence of future conflicts.</p> <p>Finally, the audit team should confirm that stakeholder engagement processes are conducted with relevant quality assurance and control (QA/QC) measures in place to ensure transparency and accountability.</p>
2.	Inadequate Development of Grievance Redress Procedure	Low	Inadequate development of grievance redress procedures is expected to lead into unresolved conflicts, stakeholder dissatisfaction and legal challenges, which undermine trust and delay both project implementation and ongoing management. Additionally, it is expected to	<p>The EPIC audit team shall confirm that a robust grievance redress procedure has been established, ensuring that all stakeholders have access to a clear, transparent, and functional mechanism for raising and resolving grievances. Verify whether this procedure is aligned with best practices, ensuring timely response and resolution of conflicts to avoid escalation and potential legal challenges.</p>

			<p>result in non-compliance with social safeguards and inaccurate reporting of social outcomes, ultimately risking the project benefits and credibility.</p>	<p>It should also be verified that the grievance mechanism is accessible to all stakeholder groups and that there is a clear process for documenting and addressing grievances in a manner that promotes transparency and accountability.</p> <p>Additionally, the audit team should assess whether trained personnel are responsible for developing and managing the grievance redress procedure, with adequate QA/QC measures in place.</p>
3.	Risk of Inadequate management capacity	High	<p>Insufficient management capacity can result in poor execution, operational inefficiencies, and failure to deliver sustainable development benefits. A lack of resources and unclear role definitions can lead to mismanagement and accountability gaps. Moreover, the risk of corruption, such as bribery or fraud, can erode trust, lead to legal challenges, and compromise the project's credibility, ultimately threatening long-term viability.</p>	<p>The EPIC audit team shall confirm that the project has sufficient management capacity, with clearly defined roles and responsibilities to ensure effective implementation and operational efficiency. The audit team should verify that adequate human and financial resources in place to support project activities, and that management processes are aligned with best practices for project execution and oversight.</p>
4	Legal and Regulatory Risks	Medium	<p>Non-compliance with legal frameworks is expected to cause delays, disputes or penalties. Changes in regulations or land ownership and neglecting Indigenous rights, can interrupt the project. Legal due diligence, expert consultation and stakeholder communication are essential for compliance and adaptability.</p>	<p>The audit team shall verify that comprehensive legal and regulatory assessments are conducted to identify potential compliance risks associated with the project. This includes reviewing relevant laws, regulations, and agreements to verify that all aspects of the project align with legal requirements and respect indigenous rights.</p> <p>The validation process should also confirm that there are mechanisms in place for monitoring changes in the regulatory environment and for updating project practices accordingly. This may involve establishing a legal advisory team to provide ongoing guidance and ensure that the project remains compliant with any additional or modified regulations.</p>

5	Risks Related to Impacts on People and Their Prosperity	Medium	<p>Inadequate assessment and management of stakeholder well-being can lead to overlooked risks, dissatisfaction, inaccurate reporting, and unaddressed negative impacts. Without transparency, participation, and effective monitoring, this may result in social safeguard violations, conflicts, and weakened stakeholder support, risking SDG compliance and the project's long-term viability.</p>	<p>The audit team shall confirm that a systematic impact assessment process is in place, focusing on the social, economic, and cultural well-being of all stakeholder groups affected by the project. This includes identifying potential risks to livelihoods and ensuring that all stakeholder groups are actively involved in the decision-making processes.</p> <p>The audit team should also verify whether effective participatory monitoring systems are established, allowing stakeholders to express their concerns and provide feedback on project activities. This engagement is critical for addressing issues related to land use, resource access, and environmental changes that could affect local prosperity.</p> <p>Additionally, the validation process should assess whether there are mechanisms for resolving stakeholder grievances in a timely and transparent manner, thereby promoting trust and collaboration between project proponents and local stakeholders. Verify whether a clear communication channel is established to ensure that project benefits are accurately reported and that any adverse impacts are promptly addressed.</p> <p>Finally, it is important to verify that the project aligns with local development priorities and the SDGs, demonstrating a commitment to enhancing stakeholder well-being and environmental stewardship, ultimately ensuring the project's long-term viability and acceptance.</p>
6	Risks Related to Impacts on the Planet	Medium	<p>Inadequate assessment and management of natural capital and ecosystem services can cause significant risks to the project. Failure to document baseline conditions and engage stakeholders may lead to overlooked concerns and unintended consequences. Without effective monitoring, tracking impacts and implementing</p>	<p>The audit team shall verify whether complete ecological assessments are conducted to establish baseline conditions for key natural capital and ecosystem services prior to project implementation. This involves identifying critical habitats, biodiversity, land use and ecosystem functions that could be affected by project activities, ensuring that these elements are prioritized in project planning.</p>

			<p>mitigation becomes challenging, risking non-compliance with the SDGs, eroding stakeholder trust, and threatening long-term viability.</p>	<p>Furthermore, the audit team should confirm that stakeholder engagement processes are in place to incorporate local knowledge and concerns regarding environmental impacts.</p> <p>Additionally, verify whether effective monitoring systems is established to track changes in ecological conditions over time. This includes regular assessments of biodiversity and forest health to evaluate project impacts and inform adaptive management strategies. Verify the established indicators and benchmarks that assist quantify progress and facilitate timely interventions when negative impacts are detected.</p>
--	--	--	--	--