

PROJECT REVIEW REPORT

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

Project ID	2502
Project Name	Tahuamanu Amazon REDD+ Project
Review Type	Verification Approval Request
Program(s)	CCB and VCS
Verification Period	01 January 2022 – 31 December 2022
Project Proponent	Maderera Rio Acre Sac (Maderacre Sac)
Methodology	VM0006. Methodology for Carbon Accounting for Mosaic and Landscape Scale REDD Projects v 2.2 and VM0015 Methodology for Avoided Unplanned Deforestation v.1.1
VVB	AENOR CONFÍA S.A.U.
Assessment Criteria	VCS Standard v4.7 and CCB Standard v3.1
Date of First Issue	06 Jun 2025
Date of Second Issue	08 August 2025
Review Conclusion	Approved
Date of Final Issue	17 October 2025

FINDINGS

#	Finding Description	VVB Response	Status																								
1	Insufficient assessment of project longevity <u>Issue</u> The VVB has not provided a sufficient description of how they confirmed – against what evidence – the PP has intention to renew the legally binding commitment to continue the project activities over the project longevity period (see background section). <u>Action Required</u> 1. In Section 4.4.3 of the VR, the VVB must describe how they assessed and confirmed the a) intention to renew the legally binding commitment to continue the project activities (i.e., management activities that avoid emissions from unplanned deforestation) in the project areas over the project longevity period b) appropriateness of the evidence used. <u>Program Rule(s)</u> VCS Non-Permanence risk tool v4.2 <u>Background</u> Section 4.4.3 of the VR states "it is a legal requirement to continue maintaining the forest, even if the contract is not renewed, in that case, the responsibility is transferred to the government as “permanent production forests””. However, this is not a requirement to continue project activities (i.e., management practices that sequesters carbon or avoids	Round 1 <u>VVB Response</u> The project proponent has provided documentation verifying the extension of the timber concession contracts, originally scheduled to expire in 2042. Article 1 of the Resolution includes the extension period for each concession contract (Resolution Approving Contract Term Extension are attached), following the extension period is summarized <table><tr><th>Concession contract</th><th>Extension (years)</th><th>Contract expiration date</th></tr><tr><td>N° 17-TAH_C-J-024-02</td><td>5</td><td>10/06/2047</td></tr><tr><td>N° 17-TAH_C-J-025-02</td><td>5</td><td>10/06/2047</td></tr><tr><td>N° 17-TAH_C-J-026-02</td><td>5</td><td>10/06/2047</td></tr><tr><td>N° 17-TAH_C-J-033-02</td><td>10</td><td>15/06/2052</td></tr><tr><td>N° 17-TAH_C-J-035-02</td><td>10</td><td>15/06/2052</td></tr><tr><td>N° 17-TAH_C-J-036-02</td><td>5</td><td>15/06/2047</td></tr><tr><td>N° 17-TAH_C-J-054-02</td><td>5</td><td>31/07/2047</td></tr></table> Based on these resolutions the project proponent reaffirms its legal commitment and ensures the continued implementation and development of the project’s activities. Peruvian forestry law (Law No. 29763 “Forestry and Wildlife Law”) allows for the renewal of forest concession contracts every five years, provided certain conditions are met—primarily related to the forest management evaluation conducted by OSINFOR Referred text was clarified in section 4.4.3 of the VR.	Concession contract	Extension (years)	Contract expiration date	N° 17-TAH_C-J-024-02	5	10/06/2047	N° 17-TAH_C-J-025-02	5	10/06/2047	N° 17-TAH_C-J-026-02	5	10/06/2047	N° 17-TAH_C-J-033-02	10	15/06/2052	N° 17-TAH_C-J-035-02	10	15/06/2052	N° 17-TAH_C-J-036-02	5	15/06/2047	N° 17-TAH_C-J-054-02	5	31/07/2047	Closed
Concession contract	Extension (years)	Contract expiration date																									
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N° 17-TAH_C-J-054-02	5	31/07/2047																									

	emissions for the project's longevity) throughout the longevity period.	<u>Verra Response</u> The evidence provided is sufficient to demonstrate the intention to continue the management practices. However, the legally binding agreement does not cover 100-year period. This finding remains open. <u>Issue</u> The evidence provided does not correspond to a legally binding agreement that covers at least a 100-years period from the project start date. <u>Action Required</u> 1. The VVB must ensure the opportunity costs and the project longevity risk scores are adjusted, considering the project is not protected by legally binding agreement to continue management practices that protect the credited carbon stocks for at least 100 years. 2. The VVB must assess the appropriateness of the NPRR, the risk rating score, and ensure that the VCUs calculation is reflected with the updated risk rating score. <u>Program Rule(s)</u> VCS Non-Permanence risk tool v4.2, <i>Sections 2.2.3 and 2.2.4</i> <u>Background</u> The PP has provided a legally binding agreement showing the intention to renew the contract to 2047 and 2052, depending on the concession (30 years and 35 years from the project start date). However, the evidence is not sufficient to demonstrate	
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		that the project activity are covered by a legally binding agreement for 100 years from the start date. Unless the PP can provide legally binding agreements to continue management practices for at least 100 years, the Project Longevity (Q7) risk score must be updated: • Considering the existence of legally binding agreement ending in 2047 and 2052 (Q7b); OR • Considering the requirement to continue management practices for 100-years as non-legally binding (Q7a). The PP may issue a statement of commitment or similar corporate documents to justify the project longevity as 100-years, but it cannot be considered a legally enforceable agreement or requirement. Round 2 <u>VVB Response</u> Maderacre holds forest concessions granted from the Peruvian State for 40 years renewable, with limitless renewals. Maderacre has already renewed its forest concessions one time. The renewal process depends fully in Maderacre, as it depends on an FSC certification or the Peruvian Regulation Body (OSINFOR) favorable inspection every 5 years. Maderacre has complied with OSINFOR inspections for 23 years, and holds an FSC certificate since 2007 continuously. So, Maderacre holds forest concessions contracts with limitless validity. These arguments are based on the following terms found in the Peruvian Law and Regulation: Irrevocability: Forestry concessions are irrevocable, as long as the holder complies with their contractual obligations and the applicable forestry regulations. The competent authority cannot arbitrarily deny its extension or renewal. Validity and Extension: Forestry concessions have a validity of up to forty (40) years; However, MADERACRE is eligible to	
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		request the extension of its forestry concession contracts, as many times as needed, if it meets certain conditions, such as having favorable results from a five-year audit approved by OSINFOR or having a current voluntary forestry certification (Forest Stewardship Council). iii. Renewal at Term: Forest regulations do not establish prohibitions or restrictions for the renewal of a contract at the end of its term, as long as the corresponding requirements and obligations are met. In addition, Maderacre's forest concessions are part of forests defined by the Peruvian Law as "<i>Permanent Production Forest</i>" (PPF). - A PPF is an area intended for responsible use of the forest resources, including timber and environmental services, through a forest management model, which enables it to keep it as standing forest overtime. - As the forest concessionaire complies with the regulation (including FSC Certification), it will renew the concession limitless. - When a forest concessionaire fail to comply with the regulation, the concession contract is terminated, and the PPF is reverted to the State. The State has the obligation to custody the forest, and to grant it to a new concessionaire. So, the cycle continues. Therefore, based on the analysis of forest regulation and Concession contracts, AENOR considers that the project longevity is properly addressed. <u>Verra Response</u> The verification report has been updated, and the VVB has provided further assessment to confirm the existence of a legal legally binding requirement to continue the management practices for the duration of the longevity. Furthermore, the PP has extended the concession contracts, demonstrating the intention of renewing the legal commitment.	
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		<u>No further action is required</u>	
		Round 3	
		<u>VVB Response</u> (Pending)	
		<u>Verra Response</u> (Pending)	

2 Incomplete mapping of deforestation			
	<u>Issue</u> 1. The LU/LC change maps and matrix in the current monitoring period is incomplete: - The map presented in Figure 3.4 of the MR does not distinguish the borders between the RR, PA, and LB. - The MR does not include LU/LC change matrices for PA and LB during the monitoring period. <u>Action Required</u> 1. The VVB must ensure the MR is updated to include: - The LU/LC change matrix for the PA and the LB during the monitoring period - a LU/LC map for the RR during the monitoring period with clear borders that distinguish between RR, PA and LB 2. The VVB must assess the updated documents and revise the VR accordingly <u>Program Rule(s)</u> VM0006, v2.2, Sections 8.2.1.4, 9.3.2 and 9.3.3 <u>Background</u> Table 3.14 of the MR consists of a LU/LC change matrix for the combination of RR, PA, and LB. New matrices showing the	Round 1 <u>VVB Response</u> Figures 3.3 and 3.4 were updated to clearly distinguish the boundaries of the project area, leakage belt, and reference region. Additionally, two tables were added showing the LULC change matrices for the project area and the leakage belt for this monitoring period. Additional figure of RR was included. Areas are in accordance with KML files attached. <u>Verra Response</u> The Forest benchmark map and LULC change have been updated to distinguish the borders between all of the project zones. Furthermore, LU/LC change matrices for the PA and the LB in the current monitoring period has been provided. <u>No further action is required</u>	Closed

	forested/non-forested areas of the PA and LB also need to be presented		
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3	Incomplete reporting of GHG emission reductions (harvested wood products)								
	<u>Issue</u>	Round 1			Closed				
	Section 5.4 of the MR does not explain and justify why the exploration intensity during the current monitoring period has significantly increased compared with the last monitoring period	<u>VVB response</u> In Section 5.4, Table 5.11, the project proponent has included a description addressing Finding 3. The information related to the required actions has been verified as follows: a. The forest operations implemented during the 2022 vintage have been approved by the national forest authority, which issued Regional Management Resolutions (RMR) No. 148, approving the re-entry into Cutting Land (CL) 18 for timber harvesting, and RMR No. 149, approving the Operational Plan for CL 19 for the 2022 harvesting period. The volumes of roundwood harvested are shown below:							
	<u>Action Required</u> 1. The VVB must ensure Section 5.4 of the MR justifies with supporting evidence a. the significant increase in exploration intensity, if it is consistent with the volume of timber declared to the authority, and b. how this increase impacts the permanence risk and whether the intensity affects the risk factors in the NPRR.	<table><tr><th>Year</th><th>CL</th><th>Volume approved by the forestry authority (m³)</th><th>Volume of harvested timber round-wood (m³)</th></tr><tr><td></td><td></td><td></td><td></td></tr></table>	Year	CL		Volume approved by the forestry authority (m³)	Volume of harvested timber round-wood (m³)		
Year	CL	Volume approved by the forestry authority (m³)	Volume of harvested timber round-wood (m³)						

2. The VVB must assess the updated documents and revise the verification report to describe the steps taken – and the evidence used – to verify the information above. Program Rule(s) VM0006, v2.2, Sections 8.4.1	2020	17	163,602.59	16,779.96
	2021	18	142,530.03	19,084.50
	2022	18		45,549.08
		19	139,309.63	
	It is important to highlight that during the years 2020 and 2021, the global economy was gradually restarting post-COVID-19 pandemic, and therefore, the volumes harvested were significantly low due to reduced demand. In contrast, by 2022, timber commercialization had resumed, leading to an increase in extraction volumes. However, only two Cutting Lands (CLs) were harvested during this vintage, so the impact was not concentrated in a single area. Moreover, in the permanent production forests within the project area, an average standing timber volume of 153 m³/ha remains after harvesting operations, indicating that the impact on forest structure and dynamics has been minimal:			

Year	m³/ha	Average standing volumes after harvesting (m³/ha)	Impact on the forest (%)
2020	1.39	153	0.90
2021	1.78		1.15
2022	2.06		1.33

b. The project proponent has demonstrated compliance with best practices in all forest operations, which have been certified by the voluntary certification body FSC since 2007, and has not recorded any serious or very serious infractions during inspections conducted by OSINFOR (the Supervisory Agency for Forest Resources and Wildlife at the national level). Penalties/Sanctions can be verified in: https://sancion-caducidad.osinfor.gob.pe/

		<u>Verra Response</u> 1. The MR has been updated to provide an explanation why the exploration intensity has increased in the current year compared to the previous years. The MR has also provided an explanation that the exploration rate is consistent with the volume of timber declared to the authority. 2. The VVB has assessed the updated information regarding the exploration intensity. <u>No further action is required</u>	
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4	Disclosure of the use of armed patrols in project activities and associated security risks		
	<u>Issue</u> It is understood that deforestation agents include illegal agents doing illegal activities. Considering the likelihood of encounters with deforestation agents while on patrol, the following clarifications on patrol operations are required. a) Whether armed patrols are used by the project as part of the property surveillance activity. If yes, the following clarifications are needed:	Round 1 <u>VVB Response</u> The forest guardians responsible for protecting and monitoring the project area do not carry firearms or employ any methods that could endanger individuals encountered during illegal activities. This policy was consistently maintained during all riverine and terrestrial patrols conducted in 2022. This fact was confirmed during the site visit. According to the established protocol, upon identifying illegal	Closed

	1. What measures are in place to ensure personnel patrolling with arms have been properly trained on the use of weapons in the field. 2. Under what circumstances project personnel are permitted to use deadly force. 3. Whether the use of weapons in patrols was communicated to stakeholders during the project's stakeholder engagement process. 4. Whether the project has considered and the VVB has assessed the potential risks or negative impacts of armed patrols on stakeholders. <u>Action Required</u> 1. The VVB must ensure that Section 2.1.11 of the CCB & VCS PD is updated to provide clarity on whether armed patrols are included as part of the project activities, by whom and under which circumstances. 2. The VVB must ensure that Section 2.2.7 of the MR is updated to provide disclosure of the potential risks or negative impacts of armed patrols on stakeholders. 3. The VVB must ensure that Section 4.3.7 of the VR is updated to provide an assessment of all training and guidance provided by the project to its rangers regarding the proper use of weapons during patrols. The VVB must confirm whether the following has been provided to rangers: a. Basic training on and regular practice with using firearms in the field; b. Training and resources on engaging with armed individuals while on patrol; c. Incident reporting procedures for when firearms are discharged outside of a regulated training;	presence within the project area, custodians must immediately report the situation to the Custody and Surveillance Coordinator through the designated communication systems, who will assess the circumstances and determine the appropriate way of action based on the severity of the case. If there is a threat to the safety of the personnel or if the illegal agents refuse to leave the area, the project proponent reports the situation to the relevant authorities, so that they may intervene in accordance with the applicable legal framework. <u>Verra Response</u> The VVB clarified that the surveillance and ground monitoring carried out as part of the project activities are not armed or intended for combat purposes. <u>This finding is closed. No further action is required</u>	
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d. Use and storage protocols for weapons while rangers are off-duty; e. Under what circumstances project personnel are permitted to use deadly force and how this intention is enforced. 4. The VVB must confirm whether the project's engagement with local communities includes the disclosure of armed patrols within the PA. 5. The VVB must update Section 4.3.7 of the VR to provide an assessment of the potential risks and mitigation of negative impacts of armed patrols on stakeholders. <u>Program Rule(s)</u> VCS Standard, v4.7, Sections 3.18.5, 3.19.2 and 3.19.5 <i>Climate, Community & Biodiversity Standards, v3.1, Sections G1.10 and 11.</i> <u>Background</u> Several potential risks and negative impacts must be considered and evaluated when armed patrols are part of the project activities: • Risks that security staff could face if confrontations with armed individuals or groups occur. • Safety risks to the employees when working in project areas. • Possible retaliation against the neighbours, including communities that are part of the project's network of informants to warn about deforestation, invasions, and fires. • Other applicable risks or negative impacts.		
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5	Incomplete description of the occupational safety assessment		
	<u>Issue</u> 1. Section 2.3.17 of the MR describes Maderacre’s company procedure for the assessment of risks to worker safety but does not provide the resulting assessment of risks due to project implementation.	Round 1	Closed
	<u>Action Required</u> 1. The VVB must ensure that Section 2.3.17 of the MR is updated to provide the summary of the assessment of substantial risks to worker safety that have arisen due to project implementation. 2. The VVB must ensure that Section 4.3.11 of the VR is updated accordingly.	<u>VVB Response</u> The project proponent has carried out an assessment of the risks associated with each of the job positions linked to the project during the 2022 period. Based on this assessment, preventive and mitigation measures have been established and implemented to reduce the likelihood and severity of potential risk events during the workday. The effectiveness of the established occupational health and safety measures is confirmed by the indicators included in the Occupational Safety and Health Statistics report (attached).	
	<u>Program Rule(s)</u> VCS Standard, v4.7, Sections 3.19. Climate, Community & Biodiversity Standards, v3.1, Sections G3.12	<u>Verra Response</u> Section 2.3.17 of the MR was updated to provide a summary of the risks to which workers are exposed as a result of project activities. In addition, the effectiveness of the established occupational health and safety measures was confirmed by the indicators included in the Occupational Safety and Health Statistics assesses by the VVB.	
	<u>This finding is closed. No further action is required.</u>		
6	Incomplete assessment for FAR closure		
	<u>Issue</u> Section 2.2.7 of the MR states that the project still does not access to carbon incomes to implement mitigation activities related to the risks cited in FAR #4. In the same section the MR also describes how the deforestation risk by agrarian neighbours and new migrants is still threatening the project zone and has deepened. Therefore, the justification provided in Section 2.7.1 of the VR for the closure of FAR 4 is insufficient.	Round 1	Closed
		<u>VVB Response</u> The project completed the sale of its first carbon credits at the end of 2022, corresponding to the first verification period (2017 – 2019). As a result, during the current monitoring period (2022), sufficient financial resources were not available to carry out all the originally planned activities. Nevertheless, significant efforts were made to reduce the threats identified in Section 2.2.7: The project facilitates biannual participatory workshops with local communities, organizations, and authorities.	

	<u>Action Required</u> 1. The VVB must ensure that Section 2.7.1 of the VR is updated to provide the summary of the measures needed and taken by the PP to mitigate the risk of deforestation via encroachment during the current verification event (Third Verification). If necessary, measures are still pending implementation, the VVB must keep the FAR 4 open for assessment during the next verification period. <u>Program Rule(s)</u> <i>Climate, Community & Biodiversity Standards, v3.1, Sections G1.10</i>	These sessions foster transparent dialogue about development and conservation efforts while collecting valuable implementation feedback. This engagement model has successfully strengthened livelihoods while reducing forest pressure - contributing to measurable declines in deforestation." • The Community Engagement Advisory Committee - comprising community reps, organizational leaders, and project staff - meets biannually to prioritize and plan activities based on urgent local needs and available project resources. • Environmental education talks and workshops for children and youth in local educational institutions aim to foster early awareness of the importance of local forests. These sessions encourage the sharing of acquired knowledge within the family, thereby promoting the adoption of a forest conservation culture as an integral part of daily practices. Despite these activities, this FAR remains open to confirm the mitigation measures after the entry of VCUs in the next monitoring period. <u>Verra Response</u> Section 2.7.1 of the VR was updated to provide a summary of the measures taken by the PP to mitigate the risk of deforestation via encroachment during the current verification event (Third Verification). Since there are still measures pending implementation, VVB has kept FAR 4 open for evaluation during the next verification period. <u>This finding is closed. No further action is required.</u>	
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7	Incomplete justification and assessment of Net Offsite Biodiversity Benefits
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<u>Issue</u> Section 2.2.7 of the MR states that the project still does not access to carbon incomes to implement mitigation activities. Sections 2.2.7 and 5.2.1 of the MR also describe the existence of potential negative offsite biodiversity risks (see Background section). Therefore, the justification that the net effect of the project on biodiversity is positive are insufficient. <u>Action Required</u> 1. The VVB must ensure that Section 5.2.2 of the MR is updated to provide a clear justification and demonstration that the net effect of the project on biodiversity is positive. 3. The VVB must ensure that Section 4.6.9 of the VR is updated to provide: a) A clear assessment to justify the project's net biodiversity impacts during this verification period. b) The summary of the measures needed and taken by the PP to mitigate the risk of negative offsite biodiversity Impacts during the current verification event (Third Verification). If necessary, measures are still pending implementation, the VVB must raise a FAR for their assessment during the next verification period. <u>Program Rule(s)</u> VCS Standard, v4.7, Section 3.19. <i>Climate, Community & Biodiversity Standards</i>, v3.1, Section B3 CCB & VCS Monitoring Report Template CCB v3.0, VCS v4.3, Section 5.2.2. CCB & VCS Verification Report Template CCB v3.0, VCS V4.4,	Round 1 <u>VVB Response</u> The project proponent has updated the MR in Section 5.2.2, detailing the activities implemented to ensure net positive impacts on biodiversity. The project completed the sale of its first carbon credits at the end of 2022, corresponding to the first verification period (2017 – 2019). As a result, during the current monitoring period (2022), the available financial resources were not sufficient to carry out all originally planned activities. Nevertheless, PP implemented biodiversity conservation action to ensure net positive benefits. The activities listed below are further detailed in Section 5.2.2 of the MR: • The project has organized environmental education workshops and talks for local schoolchildren, fostering awareness of sustainable forest management, biodiversity conservation, and climate action. These efforts empower students to join the project's transformative impact through collaborative learning. This was corroborated during the site visit by intervening principals of schools visited in the project area. • The illegal harvesting and trade of <i>Podocnemis unifilis</i> (taricaya) eggs threaten the species' survival. Climate change exacerbates this crisis by disrupting river ecosystems—altering hydrology, water levels, and nesting beaches—leading to declining reproduction rates and ecological imbalances. To address these threats, the project has partnered with Alto Purús National Park (PNAPU) to protect taricaya turtles along the Tahuamanu River, where poaching and illegal egg extraction by local fishermen severely endanger the species and river ecosystem. Together, they safeguard eggs through controlled artificial incubation and release hatchlings into the wild, enhancing the river's ecological health and supporting dependent species like ichthyofauna.	Closed
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	Section 4.6.9 <u>Background</u> Section 2.2.7 of the MR describes the following risk to the Project related with potential negative offsite biodiversity impacts: - Increased land use change areas in project activities region. Section 5.2.1 of the MR describes the following Negative Offsite Biodiversity Impacts: - Hunting pressure in remaining forests located in the leakage belt of the project area. - Illegal logging of commercially valuable timber species in the project activity region. - Degradation of surrounding forests by wood collection for final use as firewood and/or charcoal for self-consumption, and use in structures. - Land-use change from forest to corn crops and pastures in the leakage belt and project activity region.	Audit reviewed Report of Handling of taricaya turtle and Report of Training on management and conservation of the taricaya turtle confirming the action taking by project in order to protect <i>Podocnemis unifilis</i> (taricaya) eggs. The project also operates an early warning system with PNAPU to combat illegal incursions along the Tahuamanu River toward the protected Madre de Dios Indigenous Reserve - a biodiversity hotspot with untouchable status. Targeting suspected illegal loggers and fishers, the system relies on two strategic riverbank control posts staffed by forest custodians. These teams monitor river traffic year-round, triggering alerts for suspicious activity while conducting regular patrols to detect and report threats to the project zone. During the site visit a representative from PNAPU (Mercedes Perales from the Management committee of Alto Purus National Park) was interviewed, confirming biodiversity benefits. Consequently, these activities demonstrate a positive impact on biodiversity <u>Verra Response</u> Section 5.2.2 of the MR was updated with the activities implemented during the current monitoring to ensure net positive impacts on biodiversity. Also, Section 4.6.9 of the VR was updated to provide VBB's assessment of the project's net biodiversity impacts during this verification period. <u>This finding is closed. No further action is required.</u>	
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