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.

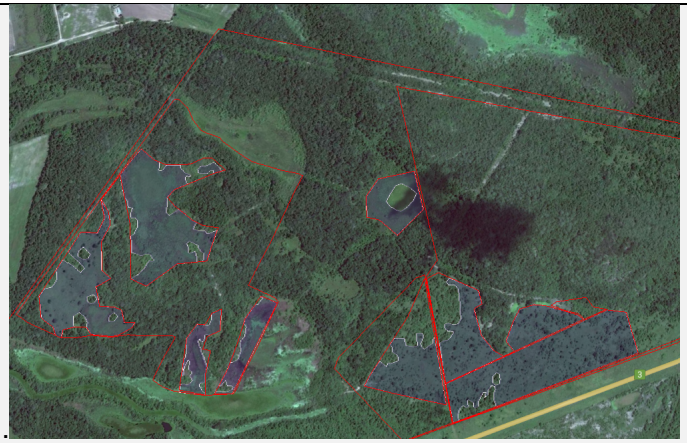
Project ID	2610
Project Name	Unitán Afforestation and Reforestation of grazing lands project
Review Type	Verification
Program(s)	VCS
Verification Period	16 August 2021 to 09 August 2024
Project Proponent	Unitán SAICA
Methodology	AR-ACM0003, Afforestation and reforestation of lands except wetlands, v02.0
VVB	Colombian Institute for Technical Standards and Certification – ICONTEC
Assessment Criteria	VCS Standard, V4.7
Date of First Issue	29 May 2025
Date of Second Issue	27 October 2025
Review Conclusion	Approved
Date of Final Issue	23 December 2025

FINDINGS

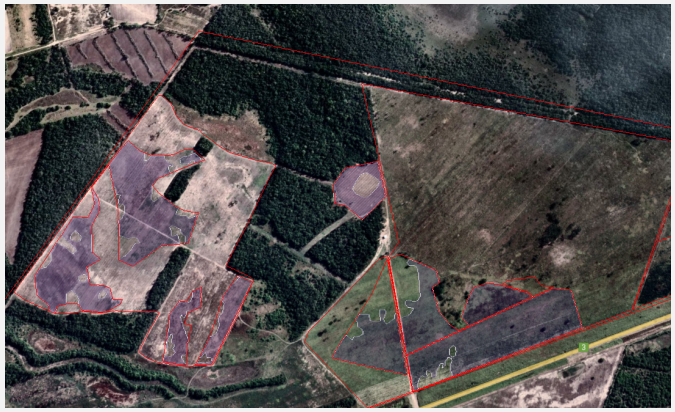
#	Finding Description	VVB Response	Status
1	**Unclear delineation of the project area and eligibility of project area**		
	<u>Issue</u> 1. A portion of the project area (PA) in the KML file contains tree cover that is dense enough to qualify as forest prior to the project start date. It has not been demonstrated that the entire project area is eligible to ARR activities, including areas that contain pre-existing tree cover (see background). 2. Satellite imagery shows that some vegetation present in parts of the project area prior to the project start date has been cleared after the start date. It has not been demonstrated that all parts of the project area were not degraded due to the project activity (see background). 3. The map in Section 1.8 of the MR does not clearly delineate the spatial boundaries of the project area. Only points are included in the map, and it does not show the polygons representing the areas where project activities are implemented. <u>Action Required</u> 1. The VVB must ensure the KML file accurately depicts the project area and includes only eligible areas, i.e., areas forested before the project start date should be excluded from the polygons. The project area map under section 1.8 of the MR and the ERR calculations must be updated accordingly. 2. The VVB must ensure that the project demonstrates, using	**Round 1** <u>VVB Response</u> 1. Upon reviewing the originally submitted KML, it was evident that the polygons included not only the project area, but also the entire farm area, which may have led to the misinterpretation that "the project contains sufficiently dense tree cover to be considered a forest before the project start date". Thus, the VVB confirms that the project does not remove forest as part of the project activity. To comply with requirement 3.11.2 3)c of the VCS Standard v4.7, it was verified that the PP: - A map revision was performed, resulting in an adjusted eligible area of 1,649.40 hectares (previously 2,348.7 hectares). Of which 1,356.18 hectares were planted at the end of this monitoring period. The MR was modified in accordance with this adjustment. - The previously sent KML (Previous KML_Establishments UNITAN_KML.kml) and the adjusted KML (Project area.kml) were attached. This allowed us to verify that the latter contains only the eligible areas of the project (1,649.40 hectares). Issue 1. Google Earth Pro imagery dated March 17, 2020. Coordinates S26°07'07.64" and W59°18'47.77" (eligible area	Closed

	verifiable evidence, that no part of the project area was degraded because of the project activity. 3. The VVB must ensure that the map in Section 1.8 of the MR is revised to clearly show the polygons representing the areas where project activities are implemented. 4. The VVB must assess the revised MR and update the verification report as needed. <u>Program Rule(s)</u> *VCS standard v4.7*, Sections 3.11.2, 3), c), ii) & 3.19.29 <u>Background</u> Examples: Issue 1: Google Earth Pro imagery dated March 18, 2016, at coordinates S26°07'07.32" and W59°19'23.99" shows tree cover sufficiently dense to qualify as forest prior to the project start date.	in blue, total property area in red).  2. As mentioned in the previous section, it has been corroborated that the project does not clear forest as part of the project activity. Satellite imagery from 2016 and 2020 shows that the eligible areas delimited in the adjusted KML (Project area.kml) have not been cleared of forest cover as part of project activities. The confusion arose from a KML that delineated the entire property area. Issue 2. Google Earth Pro imagery dated March 17, 2020. Coordinates S26°07'07.64" and W59°18'47.77" (eligible area in blue, total property area in red).	

Issue 2: Google Earth Pro imagery dated May 29, 2020, at coordinates S26°07'07.32" and W59°19'23.99" shows that vegetation present in parts of the project area prior to the project start date was cleared after the start date.



Google Earth Pro imagery dated May 28, 2020. Coordinates S26°07'07.64" and W59°18'47.77" (eligible area in blue, total property area in red).



3. The VVB verified the adjustments to the map in Section 1.8 of the MR (Figure 1), which only details the project areas.

4. An accordance with the cartographic refinement mentioned in section 1, the adjustments made to various

		sections of the MR, as well as to the ERR calculations, were evaluated. The OVV updated the VR accordingly. Verra Response The project area polygons in the KML file have been revised to exclude ineligible areas. The MR and ERR calculations have been updated accordingly.	

2	Missing information on carbon loss		
	Issue 1. Satellite imagery shows vegetation cover loss in project area polygons other than the Ex-Glombowsky farm in Puerto Tirol, which was reported in the loss event report (see background). Further information is needed to understand the impact of this loss. Action Required 1. The VVB must ensure the PP updates the MR to: a. Describe the observed vegetation cover loss and estimate the associated emissions. b. Adjust the net GHG ERRs for the monitoring period accordingly, whether it occurred during or after the monitoring period. c. Duly consider this event as a potential risk to the project in the non-permanence risk report and adjust the monitoring plan as needed. 2. The VVB must ensure that the PP provides either of the following: a. Demonstration that the event does not qualify as a Loss Event (see the *VCS Program Definitions*). b. If the event qualifies as a Loss Event (see the *VCS Program Definitions*), the PP must: I. Follow the loss event reporting requirements set out in Section 5.3.1 – 5.3.3 of the *VCS*	**Round 1** VVB Response In accordance with issue 1, the PP justified the following information: Through NDVI analysis, it was verified that the area of the Pampa Almirón farm (proposed in these findings) does not represent a case of cover loss, but rather a change in biomass productivity due to seasonal temperature and humidity (see photos in the Findings 2 folder). The area was planted with Schinopsis balansae in 2016 and 2017, but given the slow growth rate of native species, the color (or NDVI) observed in the satellite images presented in this finding corresponds to that of herbaceous plants and not that of the planted trees. An NDVI analysis conducted for the plot area revealed these seasonal changes in productivity. The NDVI time series was obtained from the Landsat 8 and 9 datasets using a Google Earth Engine script. The script masks cloudy pixels and obtains the mean NDVI for plot 33 for each Landsat image. The result was the mean cloud-free NDVI time series. The time series shows the intra-annual vegetation pattern, with June, July, and August showing the lowest NDVI values. Depending on the meteorological conditions of the year, the low values could extend into spring (September to December), as was the case in	Closed

Registration and Issuance Process v4.6).

3. The VVB must provide an assessment of the demonstration provided by the PP and update the verification report as needed.

Program Rule(s)

VCS Registration and Issuance Process v4.4, Section 5.3.1 – 5.3.3

Background

Example:

Satellite imagery from Google Earth Pro at approximately S26°40'28.90" and W59°06'10.28" indicates vegetation cover loss in portions of the project area occurring after the project start date.

Image from 12/18/2018

Image from 10/14/2022

2022.

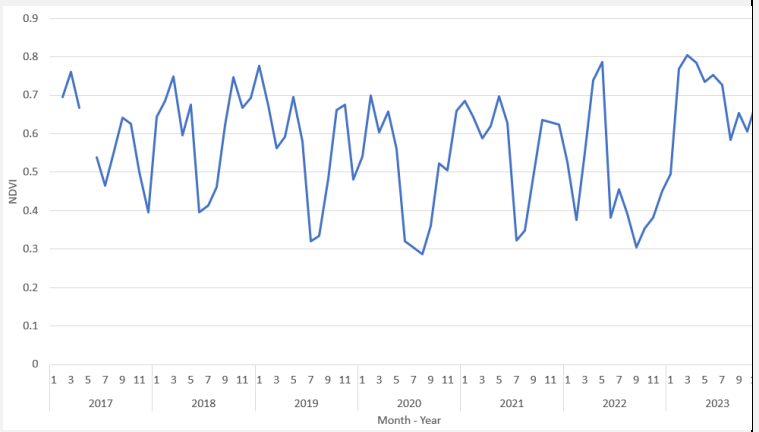


Figure 1. NDVI Temporal Series of plot 33 of Don Antonio Farm (Pampa Almirón).

In particular, meteorological information for the region showed that the winter of 2022 was particularly cold, with temperatures below 0°C during August and a drier spring compared to average values, as shown in the figures below from the 2024 Annual Report. EEAA Sáenz Peña Agrometeorological Station (full report attached in Finding 2 folder).

- Total annual values (mm) (grey line) and mean annual accumulated precipitation (yellow line)

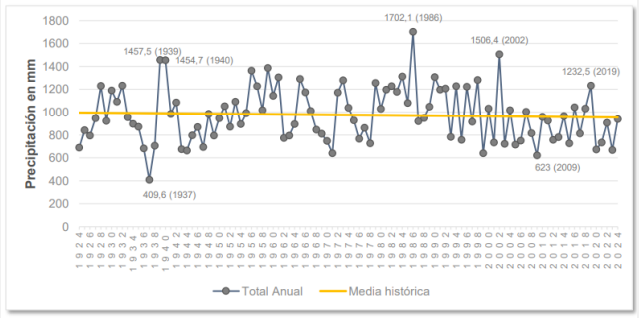


Figure 2. Annual accumulated precipitation, compared to the

historical average.

- Anomaly of average annual temperatures vs. average temperature of the 1980-2023 series (°C). If 2018 and 2022 are compared, it can be seen that 2022 had lower temperatures than average temperature and 2018 higher ones.

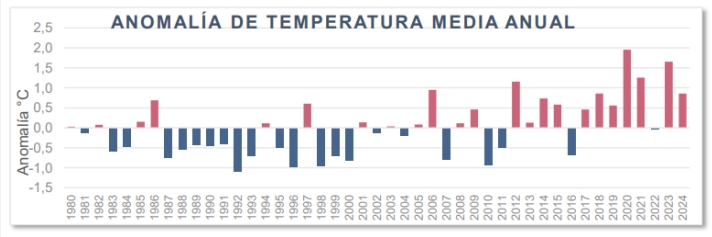


Figure 3. Anomaly of average annual temperatures vs. average temperature of the 1980-2023 series (°C)

This corroborated that the satellite images presented in the finding do not depict a loss of vegetation cover in polygons within the project area; thus, the 2022 and 2023 wildfires occurred only on the Ex-Glombovsky farm, as described in MR.

1. The VVB must ensure that the PP updates the MR to:

   a. In section 5 of the MR, the PP develops the quantification of emissions per loss event caused by the wildfire in 2022 and 2023, indicating the vegetation cover loss affected in each stratum.

   b. The PP includes the quantification of emissions per loss event in the ERR for the monitoring period.

   c. In section 2.2.2 of the MR, the PP identifies wildfire risk assessment and related prevention/mitigation

		measures. Additionally, the development of the NPRT includes an appropriate rating for "Natural Risk" and "Internal Risk", which assess fires and loss events, respectively. 2. Since the wildfire meets the definition of a Loss Event, compliance with the requirements of sections 5.3.1 – 5.3.3 of the VCS Registration and Issuance Process v4.6 was verified during the audit: - Verra was notified of the loss event on July 23, 2024. It was indicated that the discovery of the loss event occurred less than 30 days prior to this notification, while the PP was working on the project's 2nd VER documents. - Considering that VCUs had previously been issued for the project, the loss event report was submitted within two years of the discovery of the loss event. - The discovery of the loss event occurred before the start of verification (October 2024). - The loss event report was prepared using the VCS Loss Event Report Template. - The loss event report included a conservative estimate of the loss of previously verified removals due to the loss of the project's carbon stocks. The estimate was based on monitoring of the entire area affected by the loss event. - The issuance of a complete loss event declaration signed by the project proponent using the respective template. 3. ICONTEC assessed the loss event during both the document review and the on-site audit. The relevance of the	

		quantification of emissions per loss event was reviewed (see list of reviewed documents, Annex 2), and sampling points were selected to be visited in the field during the audit (Table 5, Figure 1, Figure 2). Sampling points included visits to forest strata affected by forest fires. This allowed for the verification of plantation regrowth, and carbon stock monitoring (after the loss event) was conducted by remeasuring forest inventory plots located in affected strata (Table 5). The VR contains details of the assessment of this loss event (sections 1.2, 2.5, 4.1, 4.3, 5.2). Verra Response A clarification has been provided.	

4	**Clarification needed on the PD deviation**		
	Issue 1. It is unclear whether the reduction in the project area for the Doña Virginia property, from 205 ha in the validated PD to 141 ha due to the cartographic adjustment, will not affect the total planned planting area of 2,348.7 ha. 2. It is unclear how the VVB determined that the allometric equation by Atanasio et al. (2013) complies with the requirements outlined in AR-TOOL14, Version 4.2, Appendix 1, Paragraph 7. Action Required 1. The VVB must ensure that the project proponent clarifies whether the reduction in the project area for the Doña Virginia property—from 205 ha in the validated PD to 141 ha due to the cartographic adjustment—will not affect the total planned planting area of 2,348.7 ha. 2. The VVB must document how they determined that the allometric equation by Atanasio et al. (2013) meets AR-	**Round 1** VVB Response 1. According to the response described in Finding 1, the total planned planting area was indeed affected. The total validated eligible area decreased from 2,348.7 hectares to 1,649.40 hectares. The PP informed the VVB that the total project area was reduced due to a reduction in land suitability. During validation, the PP had reported in the PD that new land would be included over time to meet the planting target of 2,348.7 hectares. However, the VCS standard does not allow the inclusion of new project areas after verification for non-clustered projects. Therefore, the project area was reduced in this verification and clarified in the deviation section. ICONTEC evaluated the documents supporting the cartographic refinement (MR, cartography, ERR) and	Closed

	TOOL14 v4.2 Appendix 1, Paragraph 7, or the PP must apply a methodology deviation. 3. The VVB must assess the updated MR and revise the VR as needed. <u>Program Rule(s)</u> *VCS Standard, v4.7*, section 2.2.1 (principle of Accuracy) <u>Background</u> The total planned planting area of 2,348.7 ha remains consistent between the validated PD and the MR, despite the cartographic adjustment. According to Section 1.1 of the validated PD, the area of degraded grasslands to be effectively planted and included within the Unitán project boundary is 2,348.7 ha (70.5% of Unitán's total area). As per Section 1.1 of the MR, the total area of degraded grasslands to be effectively planted and included within the Unitán project boundary remains 2,348.7 ha.	adjusted the VR. 2. As mentioned in the MR, there is limited information on the region's native species, specifically allometric equations for Schinopsis balansae (Quebracho colorado), the species used in the project. It was confirmed that for the genus Schinopsis (red quebracho), several equations are available for different species and regional variables. Within the main source, the National Forest Inventory of Argentina (INBN2), two equations have been analyzed: (I) one by Gaillard de Benítez et al. (1994) for Schinopsis lorentzii (II) another general one for all other species not included. These two equations have proven not to be the most appropriate for Schinopsis balansae (See annexes Finding 4) in this project, given that: - Equation (I) by Gaillard de Benítez (1994) does not correspond to the same species or the same region. By evaluating the calculation results, the PP has shown that it is more conservative to use the equation by Atanasio et al. (2013), given that the total sequestration values are 0.6% lower. - Equation II) is a general equation for natural forests that can cause significant uncertainty. Additionally, the equation only applies DBH values greater than 12 cm, meaning that all estimates yield negative values for the species' current DBH at project implementation. In this regard, the use of the Atanasio et al. equation was considered pertinent, as in the first verification of the	

		project, considering that: - It was calculated for individuals within the same project region (same province and district) and a semi-humid region - It comes from a national official institution: the National Institute of Agricultural Technology (INTA); - It covers a representative diameter range (4.8–47.7 cm), which is why it was validated and used in the first verification; - Although the number of individuals used for the study (15) is lower than the tool requested, it was developed within the framework of the Environmental Payment Fund (GEF 2623) with the objective of establishing a baseline and monitoring carbon for payments for environmental services based on measurable variables during forest inventories. - The authors' rationale for the number of individuals used is species conservation and cost considerations, while ensuring a good fit of equation (R2=0.997). - The equation has been available and cited in the forestry technical and research sector for more than 10 years. 3. The VVB modified section 3.2 of the VR to provide greater clarity in the evaluation of the equations.	
		<u>Verra Response</u> A clarification has been provided regarding the PD deviations.	

5	**Clarification needed on the scope 3 emissions**

	Issue The project involves harvesting; however, it is unclear whether the PP or authorized representative has posted the required public statement indicating that carbon credits may be issued through the Verified Carbon Standard for emission reductions or removals associated with the proponent and the relevant products. Action Required 1. The VVB must ensure the project proponent provides evidence that the required public statement has been posted, indicating that carbon credits may be issued through the Verified Carbon Standard for emission reductions or removals associated with the proponent and relevant products. 2. The VVB must assess the evidence and revise the VR as needed. Program Rule(s) VCS Standard, v4.7, Section 3.24.7	**Round 1** VVB Response 1. By reviewing Annex 7 of the MR and the website https://www.unitan.net/es-preservation.html, the VVB ensures that the project manager has published the required public statement indicating that carbon credits can be issued through the Verified Carbon Standard (VCS) for emissions removals associated with the proponent and relevant products.  It should be noted that, since the joint validation and verification of the project was conducted using a previous version of the VCS Standard, the double counting section in the PD/MR was not requested. However, the project proponent had published information about the carbon certification of its forestry project on the company's website. Furthermore, the PP indicated that no products have been generated during the recent monitoring periods. In the case of eucalyptus wood, once harvested, the company will use it internally for renewable energy generation, replacing the use	Closed

		of energy from the electricity grid. In this sense, the project activities do not affect the emissions footprint of any product that is part of the supply chain for this species. In the case of Schinopsis, it will be harvested for the tannin industry, owned by the project proponent. These products will subsequently be sold to the market. 2. Annex 7 of the MR, the website https://www.unitan.net/es-preservation.html, and the adjustment to section 1.11.3 of the MR were reviewed. Accordingly, VVB has amended section 4.1 of the VR.	
		<u>Verra Response</u> The link to the website showing that the required public statement has been posted has been provided.	

6	**Clarification needed on the grievance mechanism**		
	<u>Issue</u> 1. The following is unclear regarding the feedback and grievance redress procedure. a. How and where the project proponent will publish grievances when they are received. b. How the community was consulted about the design of the procedure. c. Who the neutral third-party mediator is. d. At what point in the process of resolution mediation is triggered. <u>Action Required</u> 1. The VVB must ensure that the project's grievances. redress procedure is clearly documented. 2. The VVB must assess the evidence and revise the VR as needed.	**Round 1** <u>VVB Response</u> 1.a. The VVB verified that resolved complaints, as required in section 3.18.4 of the VCS Standard v4.7, will be posted on the conservation and reforestation section of Unitan's website (https://www.unitan.net/es-preservation.html). This information has been included in section 2.1.4 and Appendix 6 of the MR. 1.b. Section 3.18.4 of the VCS Standard does not require the community to be consulted about the design of the grievance redress procedure but communicated and provide easy access to receive grievances from the community. In this line, the design of the grievance procedures follows national recognized standardized protocols and was communicated during the public consultation and grievances can be filed personally at the	Closed

	Program Rule(s) *VCS Standard, v4.7,* Section 3.18.4	different offices and project area sites, online and through the phone lines. 1.c. It was verified that the mediator is chosen based on the nature of the complaint, as someone with experience in the issue is sought. This is detailed in Step 5 of the Procedure (see Finding 6 folder). 1.d. It was verified that step 5 of the Procedure states that if a resolution is not reached within the affected party and Forest area in a first instance or the General Management area as a second instance, a mediation stage will start, and a third-party mediator will be involved based on the nature of the grievance. The Institutional Relations area has 30 days to coordinate the mediation. 2. The VVB verified the evidence described in each paragraph of section 1 and supplemented the information in section 4.2.4 of the VR. Verra Response Detailed information has been provided regarding the grievance mechanism.	

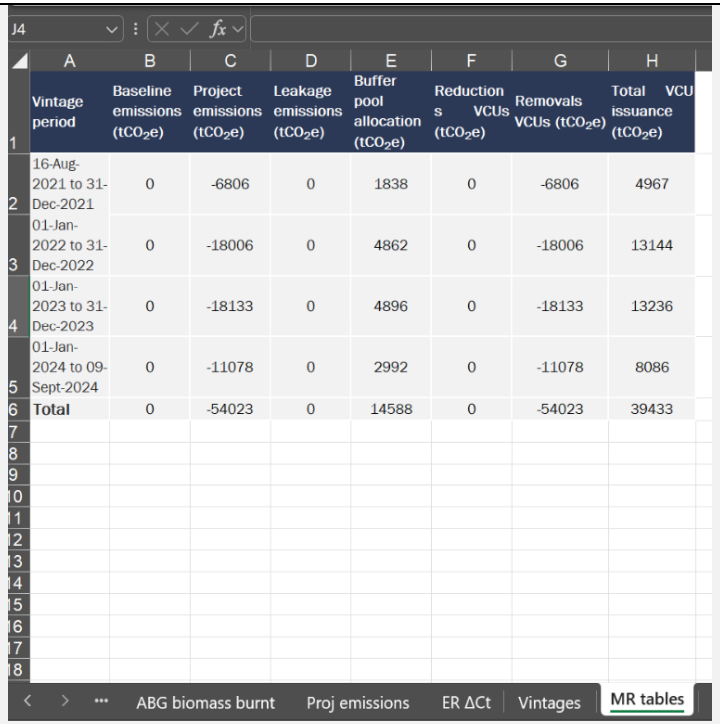
7	**Clarification needed on LTA quantification**		
	Issue 1. In the Excel spreadsheet labelled *UnitC!n VCS LTA ex-post_ID 2610*, worksheet labelled *C Stock Calculation*, it is unclear whether the final harvest or cut in the rotation cycle has been included in the long-term average (LTA) quantification for each stratum. 2. In the Excel spreadsheet titled "UnitC!n VCS LTA ex-post_ID 2610", under the worksheet "C Stock	**Round 1** VVB Response 1. The VVB verified that the LTA has been extended to 51 years to include the last harvest of the Schinopsis balansae YOP stratum in 2026. The updated ex-post LTA value is equivalent to 120,432 tCO2e. This update can be viewed in the Stock C spreadsheet, in the Unitán VCS LTA ex-post_ID 2610 spreadsheet (annex in Finding 7). The LTA value has been adjusted in the MR.	Closed

Calculation", it is unclear whether project emissions due to fire have been considered in the section on project scenario emission reductions and removals (PE). Action Required 1. The VVB must ensure that the project includes the final harvest or cut in the rotation cycle has been included in the long-term average (LTA) quantification for each stratum. 3. The VVB must ensure that the project emissions due to fire are considered in the section on project scenario emission reductions and removals (PE) in the Excel spreadsheet labelled *UnitC!n VCS LTA ex-post_ID 2610*, worksheet labelled *C Stock Calculation* . 2. The VVB must assess any changes and revise the VR as needed. Program Rule(s) *VCS Standard, v4.7*, Section 3.2.30 (1) (a), (5)	3. The VVB verified that the project's emissions from wildfires during 2022 and 2023 have now been subtracted in the "C Stock Calculation" sheet. The total LTA value is as reported in the previous section: 120.432 tCO2e. 2. The VVB reviewed the changes described in sections 1 and 3 and updated the LTA value in the VR. Verra Response The ERR calculations have been updated accordingly. However, this finding cannot be closed. Issue 1. The project emissions for the monitoring period 2021-2024 in the ERR calculation spreadsheet (*Unitán VCS LTA ex-post_ID 2610*, worksheet *GHG removals*, cells D65–D68) do not match the project emissions values presented in the table under Section 5.4 of the MR, which summarizes total VCU issuance eligible per vintage for the second monitoring period. Action Required 1. The VVB must ensure that the GHG ERRs are consistent across all project documents. 2. The VVB must assess the revised MR and ERR calculation spreadsheet and update the VR as needed. Program rule(s) VCS Standard, v4.7, Section 2.2.1 (Principle of consistency) **Round 2** VVB response The LTA ex post calculation spreadsheet (*Unitán VCS LTA ex-post_ID 2610*, worksheet *GHG removals*, cells D65–D68) have been adjusted as the values were one cell misplaced. Now the values of the table in section 5.4 of the MR and ERR calculation spreadsheets (both LTA and ERR calculation for the monitoring period) are consistent across project documents.	

	A typo in the VR (page 3), related to the LTA value, was corrected. Some formatting adjustments were also made to the document. The corrected VR version is v1.4. Verra Response The ERR calculations have been revised to ensure full consistency across the project documentation.	

8	**Clarification needed on the quantification of the baseline and project emissions**		
	Issue 1. It is unclear how the VVB has determined that the entire project area meets the conditions for zero baseline emissions, as required by Paragraphs 11 and 12 of AR-TOOL14, v4.2, given the observed tree cover loss within the project area (see #Finding 1, issue #2). 2. It is unclear from the ERR calculation spreadsheet ID2610_V1.4 how project emissions due to fire have been accounted for in the final ERR calculations. Action Required. 1. The VVB must ensure the project demonstrates how the entire project area meets the zero-baseline emissions condition as outlined in AR-TOOL14, Paragraphs 11-12, or revise the baseline emissions estimate accordingly. 2. The VVB must ensure that the ERR calculation spreadsheet is updated to clearly demonstrate how project emissions due to fire have been accounted for in the final ERR calculations. 3. The VVB must review updated MR and ERR spreadsheets and update the VR as needed. Program Rule(s) *AR-TOOL14, v4.2*, Paragraphs 11 and 12	**Round 1** VVB Response 1. As explained in Finding 1, the VVB ensured that there was no loss of vegetation cover prior to project implementation, and therefore, quantifying baseline emissions is not relevant. The project's baseline emissions can be accounted for as zero. For greater clarity, the PP included further detail in section 5.1 of the RRA, indicating that only shrubs and bushes within the project area were harvested, and scattered trees were retained (a situation evidenced during the audit site visit). The PP also included more information on baseline emissions and common practices in the area regarding livestock grazing land management, which include systematic slash-and-burn or roller-clearing of individuals, in accordance with sections 11 “a” and 12 “f” of AR Tool 14. However, the areas were adjusted to avoid cleared areas near forest. 2. The VV ensured that in the ERR calculation worksheet (Annex Finding 8), project emissions due to fire are calculated on the “ABG Biomass Burned” and “Project Emissions” pages. They are then subtracted from the ERR in the “Vintages” sheet, column D. These cells are subsequently used in the “MR Table” sheet.	Closed

	3. The adjustments to section 5.2 of the MR were verified. The table on page 93 of the MR has been updated, and the "Project Emissions (tCO2e)" column now reports emissions from both the fire and sequestrations as negative numbers, since the sinks exceed the project's emissions. The VVB also amended section 4.3 of the VR.	
	Verra Response This finding cannot be closed. Issue 1. The GHG ERRs in the ERR calculation spreadsheet (*ERR carbon calculations ID2610_V1.6*, worksheet *MR Table*s,) do not match the values presented in the table under Section 5.4 of the MR, which summarizes total VCU issuance eligible per vintage for the second monitoring period. Action Required 1. The VVB must ensure that the GHG ERRs are consistent across all project documents. 2. The VVB must assess the revised MR and ERR calculation spreadsheet and update the VR as needed. Program rule(s) VCS Standard, v4.7, Section 2.2.1 (Principle of consistency)	
	Round 2	
	VVB Response No differences were found between the table in section 5.4 and the MR table worksheet for the ERR calculation spreadsheet (*ERR carbon calculations ID2610_V1.6)*. Maybe a different version of the document was analysed. Please find attached the latest version.	



	A	B	C	D	E	F	G	H
1	Vintage period	Baseline emissions (tCO_2e)	Project emissions (tCO_2e)	Leakage emissions (tCO_2e)	Buffer pool allocation (tCO_2e)	Reductions VCUs (tCO_2e)	Removals VCUs (tCO_2e)	Total VCU issuance (tCO_2e)
2	16-Aug-2021 to 31-Dec-2021	0	-6806	0	1838	0	-6806	4967
3	01-Jan-2022 to 31-Dec-2022	0	-18006	0	4862	0	-18006	13144
4	01-Jan-2023 to 31-Dec-2023	0	-18133	0	4896	0	-18133	13236
5	01-Jan-2024 to 09-Sept-2024	0	-11078	0	2992	0	-11078	8086
6	Total	0	-54023	0	14588	0	-54023	39433

Source: ERR carbon calculations ID2610_V1.6.xlsx

Verra Response
A clarification has been provided

9	Insufficient assessment of the non-permanence risk analysis		
	Issue	Round 1	Closed

	1. Section 4.5 of the VR includes only a summary table and does not describe how each risk score was assessed, including the references and evidence assessed. 2. It is unclear how leased land is considered in section Q3a of the non-permanence risk report. 3. Action Required. 1. The VVB must, under Section 4.5 of the VR, describe how each risk score was assessed, including all references and evidence evaluated. 2. The VVB must ensure the project describes how the leased land is considered in section Q3a of the non-permanence risk report. Program Rule(s) *VCS Standard, v4.7,* Section 3.2.16 & 2.2.1 (Principle of Transparency)	VVB Response 1. The VVB assessed each risk score, including all references and evidence assessed, in section 4.5 of the VR. 2. Leased lands are addressed in the "External Risk" – Land Tenure and Access/Resource Impacts section of the NPRR, "Ownership and rights to access or use resources belong to the same entity(ies)." It was verified that only 7.4% of the area planted to date is leased. Furthermore, the contract for that area establishes the corresponding responsibilities for Unitan, which are the same as those for land ownership: free access, no limitations on forest plantation management, fire mitigation measures, water or energy access works carried out by Unitan, as well as all legal responsibilities related to the activity. In addition, a new contract has been signed between the parties that allows Unitan to automatically extend the contract term after the first period has elapsed. Even if the farm is sold during the contract term, it will not be canceled and will continue with the new owner. Finally, the contract states that live stumps and shoots, after harvest and the termination of the contract, will be the property of the lessee for management and growth, indicating an interest in further expanding the forest plantation's activities, reducing the risk of non-permanence. For all these reasons, it is considered pertinent that ownership and use of the resources belong to the same entity. Verra Response The VR has been updated to detail the VVB's assessment of the non-permanence risk ratings. Additionally, a clarification to Q3a of the non-permanence risk report has been provided.	