



Certification for a Sustainable World™

FINAL CCBA PROJECT VALIDATION REPORT

THE CHOCÓ-DARIÉN CONSERVATION CORRIDOR ACANDÍ, CHOCÓ, COLOMBIA

ANTHROTECT, LTD.

Report Date: February 9, 2012

Validation Conducted by:

SCIENTIFIC CERTIFICATION SYSTEMS

Greenhouse Gas Verification Program

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1.0 Introduction

This report presents the findings of a validation audit conducted by Scientific Certification Systems (SCS), to validate the claim made by AnthroTECT, Ltd. on behalf of and in cooperation with COCOMASUR that the the Chocó-Darién Conservation Corridor Project conforms to the Climate, Community and Biodiversity Project Design Standards (Second Edition). SCS has been accredited by the Climate, Community & Biodiversity Alliance (CCBA) to perform such validation audits.

1.1. Contact Information

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1.2. Objective

The objective of this validation is to conduct an independent assessment by SCS of the proposed project activity against all defined criteria as defined by the Climate Biodiversity and Community Alliance (CCBA). Validation will result in a conclusion by SCS whether the project activity is compliant with the CCB standards and whether the project should be submitted for registration with CCBA. The ultimate decision on the registration of a proposed project activity rests with CCBA.

1.3. Scope and Criteria

The project was assessed against the CCB Standards Second Edition to determine which of the fourteen required and three optional CCB Standards criteria the project satisfies. An “approved” project is one which satisfies all 14 of the required CCB Standards criteria.

The scope of this validation encompasses analysis of data and calculations as presented at the time of inception of project validation. The SCS lead validator issued New Information Requests (NIR) and Non-Conformity Reports (NCR), as needed, and then re-analyzed new submissions.

1.4. Project Description

The Chocó-Darién Conservation Corridor:

Executive Summary

Colombia is home to over 10% of the world’s plant and animal species despite covering just 0.7% of the planet’s surface, and has more registered species of birds and amphibians than any other country in the world. Along Colombia’s northwest border with Panama lies the Darién region, one of the most diverse ecosystems of the American tropics, a recognized biodiversity hotspot, and home to two UNESCO Natural World Heritage sites. The spectacular rainforests of the Darién shelter populations of endangered species such as the jaguar, spider monkey, wild dog, and peregrine falcon, as well as numerous rare species that exist nowhere else on the planet.

The Darién is also home to a diverse group of Afro-Colombian, indigenous, and mestizo communities who depend on these natural resources. On August 1, 2005, the Council of Afro-Colombian Communities of the Tolo River Basin (COCOMASUR) was awarded collective land title to over 13,465 hectares of rainforest in the Serranía del Darién in the municipality of Acandí, Chocó in recognition of their traditional lifestyles and longstanding presence in the region. If they are to preserve the forests and their traditional way of life, these communities must overcome considerable challenges. During 2001-2010 alone, over 10% of the natural forest cover of the surrounding region was converted to pasture for cattle ranching or cleared to support unsustainable agricultural practices.

This project will help reduce the threat of global climate change and help safeguard the ecosystems and wildlife of the Darién by strengthening the territorial identity and governance capacity of COCOMASUR. It is among the first in the world to use two new methodologies under the Verified Carbon Standard (VCS) and Climate, Community, and Biodiversity (CCB) Standards. Under the guidance of Anthrotect and the Fund for Environmental Action, COCOMASUR is

carrying out activities designed to address the main drivers of deforestation and ecosystem degradation in the region, and communities receive 50% of net profits from the project. State of the art monitoring via remote sensing and community surveillance will be carried out in collaboration with the Carnegie Institution for Science, and will provide timely and accurate assessments of project impacts. Project monitoring will be managed in an open source mapping platform to inform and engage policymakers, the scientific community, and the general public.

Project activities include 1) building governance capacity, by raising awareness of collective identity and rights, demarcating title boundaries, resolving land disputes, instilling best practices for administration and accountability, and constructing collective visions and strategic plans for land use; 2) reducing carbon emissions, through community surveillance to conserve existing forest, restoring degraded lands, and improving forest management by extending harvest rotations and minimizing logging impacts; and, 3) investing in green commodity production, by improving technologies and agricultural practices, applying proven new models for sustainable ranching (e.g., Aliança da Terra) and artisanal gold mining (e.g., Oro Verde), and securing enduring markets for other community products. Over its 30-year lifespan, the project will prevent the emission of 1.4 million tons of CO₂ into the atmosphere, demonstrating how forest-dependent communities can generate income from markets for ecosystem services while preserving their traditional ways of life.

1.5. Summary of Validation Conclusion

Following completion of SCS's duly-accredited validation process, it was our conclusion that the Chocó-Darién Conservation Corridor conforms to the CCBA Climate, Community and Biodiversity Project Design Standards (Second Edition) and achieves the Gold Level under the Biodiversity criterion (Appendix A), subject to 39 Non-conformity Reports (NCRs) 2 Opportunities for Improvement (OFIs) and 35 New Information Requests (NIRs). The project proponent provided satisfactory responses to the NCRs issued as a result of the initial evaluation and it is our opinion that the project fully meets the standards. Findings 70-76 were rescinded because the proponent decided to meet only the biodiversity component of the Gold Section.

2.0 Methodology

SCS began reviewing the Project in May, 2011, beginning with a desk audit of Project documentation and phone calls and email correspondence with AnthroTECT. An independent auditor was then authorized by SCS to conduct a formal site visit and validation assessment in June, 2011. A further review of documentation, audit findings, and public comments submitted to the CCBA was conducted in the lead up to a draft report issued in February, 2012. The draft report included 36 Non-conformity Reports, 2 Opportunities for Improvement and 31 New Information Requests that the project proponent had to respond to; this final report, therefore, represents an update to the draft report based on the satisfactory response to each finding.

2.1. CCBA Standards

SCS conducted its evaluation to validate claims that the Project conforms to the CCBA Climate, Community and Biodiversity Project Design Standards (Second Edition) ("the CCB Standards"). The CCB Standards require conformance to 14 criteria in each of 4 categories: 1) General (5

criteria), 2) Climate (3 criteria), 3) Community (3 criteria), and 4) Biodiversity (3 criteria). In addition, applicants can achieve a higher level of validation through the application of three criteria in the Gold Level section. Gold level validation can be achieved by projects that meet the core requirements and at least one optional Gold Level criterion.

2.2. Auditor Qualifications

Lead Validator: Kyle Meister, SCS Certification Forester

Kyle Meister has been with SCS for two and a half years and has conducted FSC pre-assessments, evaluations, and surveillance audits in Brazil, Panama, Mexico, Indonesia, India, and all major forest producing regions of the United States. He has participated as a team member on Climate Action Reserve verification assessments and has consulted on Forest Carbon Offset projects in Ecuador, Colombia, and Brazil prior to joining SCS. He holds a B.S. in Natural Resource Ecology and Management and a B.A. in Spanish from the University of Michigan; and a Master of Forestry from the Yale School of Forestry and Environmental Studies. Mr. Meister has experience as an environmental educator and natural resource consultant in the U.S., Mexico, Ecuador, Costa Rica, Colombia, and Brazil. He is responsible for reviewing all of SCS' forest management reports from Latin America. He is a member of the Forest Guild, Society of American Foresters, and International Society of Tropical Foresters.

Local Expert & Social Impact Assessor: Yellen Aguilar-Ararat, Contract Technical Expert

Yellen Aguilar-Ararat is an agronomist with a degree in environmental law and ethnic groups of Colombia. He specializes in business administration, conflict resolution, economic and social development, and voluntary forest certification. Mr. Ararat has more than 25 years of experience in development projects in cooperation with government and non-government organizations related to the recognition of ethnic rights, land use and forest management planning, community forestry, forest certification, protected areas evaluation, and environmental and social impact evaluation with an emphasis on Afrocolombian and Indigenous communities of Colombia's Pacific Coast. He was the coordinator of the committee that developed the first set of national FSC forest management standards in Colombia and is now the technical coordinator for the working group that promotes voluntary forest certification. He currently qualifies as a junior auditor for FSC forest management certification in Colombia.

Validator: Zane Haxton, SCS GHG Verification Forester

Mr. Haxton holds a M.S. in Forest Resources from Oregon State University and a B.S. from The Evergreen State College. A well-rounded forestry professional, Mr. Haxton held a wide variety of positions in forest research and management before coming to SCS, ranging from work on logging and tree planting crews to experience as a biological sampling technician and research assistant. Mr. Haxton is a specialist in forest inventory, with areas of expertise including sampling design, inventory management and the use of growth and yield models to evaluate potential management regimes. Through his work at SCS, Mr. Haxton has worked on forestry projects in both the northern and southern hemisphere that span four countries. Mr. Haxton is well versed in methodologies for Avoided Planned Deforestation, Improved Forest Management, and Afforestation, Reforestation and Revegetation projects, with experience working in tropical and temperate forests alike. Mr. Haxton is currently a verifier under the Climate Action Reserve, the Verified Carbon Standard and the Climate, Community and Biodiversity Standard.

Validator: Christie Pollet-Young, SCS Senior GHG Verification Forester

Ms. Pollet-Young is a Verification Forester for SCS's Greenhouse Gas Verification Program. Ms. Pollet-Young has over 15 years of experience in forestry, ranging from forest ecology research to conservation planning to carbon offset verification in both tropical and temperate climates. She has previously worked for the Smithsonian Tropical Research Institute's Center for Tropical Forest Science and The Nature Conservancy. While serving as Conservation Specialist for Peru with TNC, Ms. Pollet-Young oversaw the development of the Peruvian Yungas Ecoregional Plan, provided technical assistance to the conservation actions for the Central Selva Protection Area, and collaborated on the bi-national Equatorial Pacific Ecoregional Plan between Peru and Ecuador. Ms. Pollet-Young completed a Master of Forest Science from the Yale School of Forestry and Environmental Studies and graduated with high honors from the University of California, Berkeley with a Bachelor of Science in Environmental Science, Policy and Management and a minor in forestry. Ms. Pollet-Young is a lead auditor with SCS who has participated in the validation or verification of over 20 forest carbon offset projects around the globe under the Climate Action Reserve, the Verified Carbon Standard, the Chicago Climate Exchange, and the Climate, Community and Biodiversity Standards.

Technical Reviewer: Todd Frank, SCS GHG Verification Program Manager

Mr. Frank has a proven track record of effectively managing verification projects having overseen the growth and development of the SCS Greenhouse Gas Verification Program since its inception. Mr. Frank holds a master's degree in International Environmental Policy from the University of California San Diego and a Bachelor's degree from the University of California at Berkeley. Mr. Frank is certified as a lead verifier under the CAR, VCS, CCB, CCX, and TCR programs and has formal training in ISO 14064 and ISO 9001. He has served as lead verifier for a wide range of projects across various industries, globally. Mr. Frank also has experience in emissions trading and offset project development experience having worked on the first project ever to be validated to the CCB standard. Mr. Frank serves on the Verification Advisory Board for The Climate Registry and serves on the Advisory Board for Northern Arizona University's Climate Science Solutions master's program.

2.3. Audit Process

The audit process included the following steps:

- Initial client meeting and project orientation (via conference call);
- Review of project documentation, including project design reports, preliminary models, and project background descriptions;
- Site visit from June 2-10, 2011, that included:
 - Opening meeting in Bogotá, Colombia
 - Visits with Anthrotect project partners and contractors in Bogotá (Fondo para la Acción Ambiental; Abogada; Universidad Nacional de Colombia; and Mercy Corps);
 - Project overview by Anthrotect (various discussions and document overviews);
 - Presentation of project accounting model (remote sensing model by Henry Arellano, Doctoral Candidate at the National University of Colombia);
 - Interviews with project partners and supporters in Acandí, Chocó, Colombia and the surrounding area, including COCOMASUR and its member communities, and the neighboring indigenous reserve; and

- Field trips that included: visits to COCOMASUR member communities (Peñalosa, Acandí); project area boundary with pasture (Rio Tolo); Lot 1 forest measurement plot (approximately 700 ha); and Río Geronimo within project area.
- Review of stakeholder comments;
- Issuance and review of NCRs, NIRs and OFIs;
- Project proponent response to NCR, NIRs, and OFIs;
- Further document review and draft report preparation;
- Technical review and approval of the draft report by SCS;
- Issuance of the final report to Anthroctect; and
- Submission to the CCBA for review and posting.

3.0 Stakeholder Comments

The Project Design Document (PDD) was posted on the CCBA website on June 27, 2011 and the public comment period extended through July 27, 2011. No comments were received (see Appendix B).

3.1. CCB Validation Findings

This report of our validation findings addresses each of the CCBA criteria and indicators. For each criterion, the CCBA indicators are listed along with a description of the evidence that was considered, and reference the findings from the audit when applicable. These findings can include Non-Conformity Reports (NCRs), Opportunities for Improvement (OFIs) and New Information Requests (NIRs), and are compiled in Section 5. In the case of non-conformances, a Non-Conformity Report stipulates the deficiency and its relation to the CCB protocol. NCRs indicate broad non-conformance at the criterion level that must be satisfied prior to project validation. An Opportunity for Improvement is issued when overall conformance with a criterion has been achieved but in instances where actions could be taken to further ensure compliance with an indicator. A New Information Request indicates when additional information is necessary to complete the validation. All NIRs must be satisfactorily responded to prior to project validation.

Throughout the remainder of this report, Anthroctect and COCOMASUR collectively will be referred to as the “Project Proponent” or “the Proponent”. The Project Proponent collated much of their Project information in a document entitled The Chocó-Darién Conservation Corridor: A Project Design Note for CCBA/VCS Audit, dated June, 24 2011. CCBA refers to such documents as the Project Design Documents (PDD). The PDD was revised in November and December of 2011, and again in January and February of 2012 in response to NCRs/OFIs/NIRs issued in the draft report as part of the evaluation process. The final version of the PDD is available to the public on the CCBA website (The Chocó-Darién Conservation Corridor, V8.62, February 8, 2012; <http://www.climate-standards.org>).

3.2. General Section

The General Section of the CCB Standards addresses original conditions in the project area, baseline projections, project design and goals, management capacity and best practices, and legal status and property rights.

3.2.1. G1 – Original Conditions in the Project Area

The original conditions at the project area and the surrounding project zone before the project commences must be described. This description, along with baseline projections (see G2), will help to determine the likely impacts of the project.

Indicator G1.1. The location of the project and basic physical parameters (e.g., soil, geology, climate).

Findings: The proponent’s PDD has a section for G1.1 that includes soils and geology, topography (including a map and a topographical profile), climate, and hydrographic features. Descriptions are substantiated with citations and data.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator G1.2. The types and condition of vegetation within the project area.

Findings: The description of vegetation includes citations from several reputable sources in the Chocó-Darién region. The proponent’s completed transect and an analysis of remotely sensed data to classify vegetation and land use within the project zone, which by definition includes the project area. Vegetation includes natural humid tropical forest, natural grassland and shrub land, pasture, and altered areas.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator G1.3. The boundaries of the project area and the project zone.

Findings: In the first draft of the PDD, the proponent had not clearly defined the project area and the project zone. Discrepancies in the total area of the project area were also found. In

response to the below NCR, the proponent defined the project area and project zone, and in response to the below NIR consistently defined the size of the project area.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 01

New Information Requests: NIR 02

Opportunities for Improvement: None

Indicator G1.4. Current carbon stocks within the project area(s), using stratification by land-use or vegetation type and methods of carbon calculation (such as biomass plots, formulae, default values) from the Intergovernmental Panel on Climate Change’s 2006 Guidelines for National GHG Inventories for Agriculture, Forestry, and Other Land Use or a more robust and detailed methodology.

Findings: During the first revision of the PDD, SCS made the observation that the proponent does not reference the methodology used for estimating the current carbon stocks within the project area. For example, if carbon stocks were estimated using stratification by land-use or vegetation type and methods of carbon calculation (such as biomass plots, formulae, or default values) from the Intergovernmental Panel on Climate Change’s 2006 Guidelines for National GHG Inventories for Agriculture, Forestry and Other Land Use (IPCC 2006 GL for AFOLU) were utilized, then any of these recognized methodologies should have been referenced. If a more robust and detailed methodology was used, than that methodology should have been referenced. If a published methodology was used, the full reference should have been given and any variations from the published methodology must be explained. Evidence of non-conformance included a section where a reference to IPCC is proposed, but was not included. Overall, no methodology is cited. There are several references included in the description, but it was unclear if these come from a published methodology. During the second revision, after the proponent updated the PDD on June 24, 2011, SCS concluded that this NCR still stands.

In the revised PDD, Section G.1.4: *Current Carbon Stocks in the Project Area*, the methodology employed to calculate was clearly stated. The current carbon stocks section was added showing standard calculation for total carbon stocks using the IPCC default values, literature estimates and conversion factors. The total current carbon stock within the project area across all considered pools is 9.87 million tCO_{2e}. References to previous inventory estimates have been removed. Current carbon stocks are based on a land use stratification (forest/non-forest), regional literature estimate, IPCC defaults and Tier 1 methods from IPCC GPG.

Per this initial response, the proponent was asked for additional information regarding the methodology, specifically on whether the units of the Golley *et al.* (1969) value are Mg C/ha or Mg biomass/ha. The proponent updated the PDD and provided a scanned reference to Golley *et al.* (1969), which shows that the 269.0 Mg C/ha value comes from the premontane forest aboveground biomass for overstory leaves and stems given in kg /ha (269,010 kg/ha) converted to Mg/ha (see Table 10 of PDD). This units should have been 269.0 Mg/ha of biomass, rather

than C as previously stated in PDD. The proponent clarified in final version of PDD that units were Mg/ha of biomass.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 03

Opportunities for Improvement: None

New Information Requests: None

Indicator G1.5. A description of communities located in the project zone, including basic socio-economic and cultural information that describes the social, economic and cultural diversity within communities (wealth, gender, ethnicity, etc.), identifies specific groups such as Indigenous Peoples and describes any community characteristics.

Findings: The proponent describes the communities in the project zone, including basic socio-economic and cultural information. Municipalities and population are discussed, as are historical conditions that have influenced the current setting. The legacy of slavery and colonization of areas under the control of indigenous peoples are described. The PDD includes a summary table of townships and sectors/settlements within the project zone. Livelihoods mostly include natural resource extraction and cultivation. Social pressures include post-conflict resolution, the legacy of marginalization, and re-enforcing cultural/territorial identity. During the field evaluation, the validation team discovered that this section lacked a description of certain communities in the project zone, which the proponent addressed in an updated version of the PDD. Baseline age and gender conditions, estimation for the number of plantations in the project zone, references, and the correct use of project area and project zone also were provided in response to NIRs.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 04, 05, 06, 07

Opportunities for Improvement: None

Indicator G1.6. A description of current land use and customary and legal property rights including community property in the project zone, identifying any ongoing or unresolved conflicts or disputes and identifying and describing any disputes over land tenure that were resolved during the last ten years (see also G5).

Findings: The proponent describes land use and customary/legal rights, including community property in the project zone. A history of territorial law that affects the project zone is described. A description of land use, such as cattle ranching, cultivation, logging, and infrastructure areas is also provided. The proponent's right to the land, trees, and carbon rights

are clear on the surface. However, subsurface rights may affect carbon permanence. In response to the below NIRs, the proponent provided information on economic activities by land use and organizational type, clarified that the Colombian legal framework provides that carbon rights belong to COCOMASUR on the surface and subsurface, clarified mining as an economic activity in G1.5, and provided a land tenure conflicts overview in confidential annex 32 (CA 32).

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 08, 09, 10, 11

Opportunities for Improvement: None

Indicator G1.7. A description of current biodiversity within the project zone (diversity of species and ecosystems) and threats to that biodiversity, using appropriate methodologies, substantiated where possible with appropriate reference material.

Findings: Generally the description of biodiversity is thorough, however the first version of the PDD lacked citations for certain sections and included biodiversity not under the scope of the CCB standard. The proponent also referred to the project area and project zone interchangeably in this section, thus making any determination of project zone boundaries difficult. The proponent revised G1.7 and G1.8 in response to NCR 12, treating species groups consistently with references. Threats to species groups and a statement were removed from the PDD due to a lack of field evidence.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 12

New Information Requests: NIR 13, 14

Opportunities for Improvement: None

Indicator G1.8. An evaluation of whether the project zone includes any of the following High Conservation Values (HCVs) and a description of the qualifying attributes:

- 8.1. Globally, regionally or nationally significant concentrations of biodiversity values;
 - a. protected areas
 - b. threatened species
 - c. endemic species
 - d. areas that support significant concentrations of a species during any time in their lifecycle (e.g. migrations, feeding grounds, breeding areas)

- 8.2. Globally, regionally or nationally significant large landscape-level areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance;

8.3. Threatened or rare ecosystems;

8.4. Areas that provide critical ecosystem services (e.g., hydrological services, erosion control, fire control);

8.5. Areas that are fundamental for meeting the basic needs of local communities (e.g., for essential food, fuel, fodder, medicines or building materials without readily available alternatives); and

8.6. Areas that are critical for the traditional cultural identity of communities (e.g., areas of cultural, ecological, economic or religious significance identified in collaboration with the communities).

Findings: At the time of the June, 2011 evaluation, the proponent had not completed the HCV assessment. The proponent completed the HCV assessment in the 3rd quarter of 2011 and updated the HCV section of the PDD accordingly with identified HCVs and the measures for their ongoing maintenance and enhancement.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 15

New Information Requests: None

Opportunities for Improvement: None

3.2.2. G2 – Baseline Projections

A baseline projection is a description of expected conditions in the project zone in the absence of project activities. The project impacts will be measured against this ‘without-project’ reference scenario.

The project proponents must develop a defensible and well-documented ‘without-project’ reference scenario that must:

Indicator G2.1. Describe the most likely land-use scenario in the absence of the project following IPCC 2006 GL for AFOLU or a more robust and detailed methodology, describing the range of potential land use scenarios and the associated drivers of GHG emissions and justifying why the land-use scenario selected is most likely.

Findings: In cases where a published methodology is used to determine the most likely land use scenario in the absence of the project, the full reference must be given and any variations from the published methodology must be explained. The proponent has not included a reference to the methodology used and any variations from it. Therefore, during the initial assessment, the proponent had not developed a defensible and well-documented ‘without-project’ reference scenario that describes the most likely land-use scenario in the absence of the project following

IPCC 2006 GL for AFOLU or a more robust and detailed methodology, describing the range of potential land use scenarios and the associated drivers of GHG emissions and justifying why the land-use scenario selected is most likely.

The project area includes two areas totaling 1,000 ha that already have been designated for timber harvest. These areas may be excised or included as part of the project, but may require another recognized methodology in order to be a part of the project scenario if timber harvesting is still to occur (i.e., a different REDD methodology that takes into account degradation, improved forest management (IFM), etc). If no harvesting occurs, the proponent may model these areas on its current methodology.

Furthermore, under the baseline scenario these areas designated for timber harvest would require infrastructure to access them, which would likely have other effects on the land use scenario in the baseline. The proponent must provide information as to whether or not its baseline model takes these timber harvest areas and associated infrastructure (and any effects of timber harvest/infrastructure on land use) into account.

In November, 2011 the proponent clarified that no harvesting will occur in the project area so that the same methodology can be applied to the entire project area. In addition to the projection by the Dinamica model, projections from the VCS-approved methodology VM0009 are also presented. Projections of deforestation by these models are similar. Estimated carbon stock changes are presented in section G.2.3 based on the VM0009 methodology and current carbon stocks presented in section G.1.4. The most likely land use scenario is described using a combination of Dinamica and the VCS VM0009 methodology. A range of potential land use scenarios and the associated drivers are described.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 16, 17

New Information Requests: None

Opportunities for Improvement: None

Indicator G2.2. Document that project benefits would not have occurred in the absence of the project, explaining how existing laws or regulations would likely affect land use and justifying that the benefits being claimed by the project are truly 'additional' and would be unlikely to occur without the project.

Findings: During the initial assessment of the PDD, the three headings under the additionality of project benefits offer a very generalized explanation of barriers to the project and reference no case studies, field evidence, analyses, articles, existing laws and regulations or other potential supporting information to provide a defensible and well-documented description of the 'without project' reference scenario. Without references, the proponent's argument to prove that the project benefits would not have occurred in the absence of the project was weak. The description must include information on how existing laws or regulations would likely affect land

use and justifying that the benefits being claimed by the project are truly ‘additional’ and would be unlikely to occur without the project.

In December, 2011, the proponent provided evidence that it conducted a preliminary assessment using the VCS Tool for the Demonstration and Assessment of Additionality (VM0001), and that Section G.2.2 of the PDD has been updated accordingly. The municipal development plans for Acandí do not currently include collective territories, and therefore there is no conflict in land use planning. COCOMASUR may, however, solicit the municipality of Acandí, to recognize its territorial development plan when it is completed, thereby increasing coherence in land use planning and optimizing resource use.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 18

New Information Requests: NIR 19

Opportunities for Improvement: None

Indicator G2.3. Calculate the estimated carbon stock changes associated with the ‘without project’ reference scenario described above. This requires estimation of carbon stocks for each of the land-use classes of concern and a definition of the carbon pools included, among the classes defined in the IPCC 2006 GL for AFOLU. The timeframe for this analysis can be either the project lifetime (see G3) or the project GHG accounting period, whichever is more appropriate. Estimate the net change in the emissions of non-CO₂ GHG emissions such as CH₄ and N₂O in the ‘without project’ scenario. Non-CO₂ gases must be included if they are likely to account for more than 5% (in terms of CO₂-equivalent) of the project’s overall GHG impact over each monitoring period.

Projects whose activities are designed to avoid GHG emissions (such as those reducing emissions from deforestation and forest degradation (REDD), avoiding conversion of non-forest land, or certain improved forest management projects) must include an analysis of the relevant drivers and rates of deforestation and/or degradation and a description and justification of the approaches, assumptions and data used to perform this analysis. Regional-level estimates can be used at the project’s planning stage as long as there is a commitment to evaluate locally-specific carbon stocks and to develop a project-specific spatial analysis of deforestation and/or degradation using an appropriately robust and detailed carbon accounting methodology before the start of the project.

Findings: During the initial assessment, the proponent had not presented its calculations of the estimated carbon stock changes associated with the ‘without project’ reference scenario described in G.2.1.

In response to the below NIR, the proponent clarified that the forest inventory is not being used to estimate carbon stocks prior to the start of the project. Instead published values and IPCC defaults are being used, which include palms and aboveground non-commercial biomass for included pools. Estimated carbon stocks are included in the PDD and definitions of the carbon

pools are included in the PDD. Carbons stock changes are estimated for the project crediting period. A justification for the exclusion of Non-CO2 emissions is provided in the PDD. In response to NCR, Calculations of the estimated carbon stock changes are presented in section G.2.3 of the PDD. Estimated carbon stock changes in tCO2e are derived from VM0009 while estimates of land use change (in hectares) are derived from the Dinamica model. The proponent was asked to provide describe and justify all approaches, assumptions and data used to forecast carbon stock changes in the baseline scenario in the PDD. Assumptions and approaches to the model are now described in the G.2.3, including expected changes in land use under the baseline scenario. Data used to estimate carbon stock changes associated with the “without-project” reference scenario are from image point interpretation of the reference area over a historic reference period. Per VM0009, these data are used to parameterize the Cumulative Deforestation Model. Figures 20-27 show the results of the image interpretation of the 2202 points on a grid over the reference area.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 20

New Information Requests: NIR 21

Opportunities for Improvement: None

Indicator G2.4. Describe how the ‘without project’ reference scenario would affect communities in the project zone, including the impact of likely changes in water, soil and other locally important ecosystem services.

Findings: The proponent provides an explanation of community impacts under the ‘without project’ scenario, including the erosion of territorial rights, dignity, and identity; degradation of livelihoods based on forests and other ecosystems (ecosystem services and products derived from forests and other ecosystems); and low income and productivity. These impacts are consistent with interviews and other evidence gathered. For example, the evaluation team observed examples of encroachment in the field, and dependence on extra-community sources of employment.

In response to the below NIR, the proponent revised text on the food system in the ‘without project’ scenario, describing subsistence agriculture, dependence on imported products, lack of food security, scarcity, nutritional deficiency, and overfishing.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 22

Opportunities for Improvement: None

Indicator G2.5. Describe how the ‘without project’ reference scenario would affect biodiversity in the project zone (e.g., habitat availability, landscape connectivity and threatened species).

Findings: Degradation and destruction of the moist forest is the likely ‘without project’ scenario. The area currently connects the Darién in Panamá to the Chocó in Colombia. Cattle ranching and logging are perhaps the two biggest threats to forest degradation and destruction. The proponent has identified the loss of species and ecosystem services as being connected to the loss of biodiversity and habitat fragmentation. For example, the Chocó received much rainfall and depends on forests and other ecosystems to absorb excess water. Impacts to biodiversity are well-cited. The completion of the Inter-American highway would increase pressures on habitat in this distinctive biological region from logging, clearing and encroachment of ranches, degrading the density and composition of the forest understory, disrupting the age distribution of trees due to uncontrolled logging and resulting in a significant conversion of habitat of the abundant and endemic taxa that include plants birds, mammals, amphibians and butterflies.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

3.2.3. G3 – Project Design and Goals

The project must be described in sufficient detail so that a third-party can adequately evaluate it. Projects must be designed to minimize risks to the expected climate, community and biodiversity benefits and to maintain those benefits beyond the life of the project. Effective local participation in project design and implementation is key to optimizing multiple benefits, equitably and sustainably. Projects that operate in a transparent manner build confidence with stakeholders and outside parties and enable them to contribute more effectively to the project.

The project proponent must:

Indicator G3.1. Provide a summary of the project’s major climate, community and biodiversity objectives.

Findings: Objectives of the project are described under climate, community, and biodiversity headings.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator G3.2. Describe each project activity with expected climate, community and biodiversity impacts and its relevance to achieving the project’s objectives.

Findings: In the initial review of the PDD, the proponent did not describe the relevance to achieving the project’s objectives of each project activity with expected climate, community and biodiversity impacts. In response to the below NCR, the proponent updated G3.2 correlating objectives to project activities and expected impacts to climate, community, and biodiversity.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 23

New Information Requests: None

Opportunities for Improvement: None

Indicator G3.3. Provide a map identifying the project location and boundaries of the project area(s), where the project activities will occur, of the project zone and of additional surrounding locations that are predicted to be impacted by project activities (e.g. through leakage).

Findings: The proponent did not provide a map identifying the project location and boundaries of the project area(s), where the project activities will occur, of the project zone and of additional surrounding locations that are predicted to be impacted by project activities (e.g. through leakage) during the initial review of the PDD. In response to NCR, the proponent included a map showing leakage belt and project area in section G3.3.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 24

New Information Requests: None

Opportunities for Improvement: None

Indicator G3.4. Define the project lifetime and GHG accounting period and explain and justify any differences between them. Define an implementation schedule, indicating key dates and milestones in the project’s development.

Findings: Initially, the proponent had not defined the GHG accounting period, along with an explanation and justification for any differences the project lifetime and the GHG accounting period.

Update: The proponent updated section G3.4 with the project’s GHG accounting period along with an explanation for the project’s lifetime. A brief implementation schedule was defined for years 1-5 and 6-30. A supplemental annex demonstrates expected credit generation during the GHG accounting period, as well as projections beyond the project lifetime.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 25

New Information Requests: None

Opportunities for Improvement: None

Indicator G3.5. Identify likely natural and human-induced risks to the expected climate, community and biodiversity benefits during the project lifetime and outline measures adopted to mitigate these risks.

Findings: During the initial review of the PDD, mitigation measures had not been outlined for earthquakes, viability of REDD offsets, and opportunity costs of REDD and high discount rates. In the updated version of the PDD, the proponent identified risks to benefits and detailed measures to mitigate them. ‘Community capacity risk’ was changed to ‘community financial risk.’ Section G3.5 of the PDD has been updated to include mitigation measures for earthquakes, viability of REDD offsets, and opportunity costs of REDD. These revisions include results from individual time preference exercises carried out in the project zone to assess individual discount rates and their potential impact on conservation. Artisanal mining was moved to G1.5 and the text now uses only one term, “artisanal mining.” Clarification in the characterization of the activity itself as not a threat to the project was provided.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 27

New Information Requests: NIR 26, 28

Opportunities for Improvement: None

Indicator G3.6. Demonstrate that the project design includes specific measures to ensure the maintenance or enhancement of the high conservation value attributes identified in **G1** consistent with the precautionary principle.

Findings: As a formal HCV assessment has not been carried out (see G.1.8) at the time of the initial assessment, the proponent was unable to demonstrate that the project design includes specific measures to ensure the maintenance or enhancement of the high conservation value attributes consistent with the precautionary principle. Proponent carried out an HCV assessment in response and identified high conservation values with specific measures for their maintenance and enhancement. Confidential annexes (CA) 22: HCV Assessment and 30: HCV monitoring framework were provided as supporting evidence.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 29

New Information Requests: None

Opportunities for Improvement: None

Indicator G3.7. Describe the measures that will be taken to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime.

Findings: Although the proponent described the measures that will be taken to maintain and enhance the community benefits beyond the project lifetime, it did not do the same for climate and biodiversity benefits beyond the project lifetime at the time of the first PDD. The proponent added a statement on how the project will maintain climate and biodiversity benefits beyond the project lifetime, which emphasizes alternative and value-added sources of income, education, communications infrastructure, and micro-business development as means of maintaining project benefits beyond its lifetime.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 30

New Information Requests: None

Opportunities for Improvement: None

Indicator G3.8. Document and defend how communities and other stakeholders potentially affected by the project activities have been identified and have been involved in project design through effective consultation, particularly with a view to optimizing community and stakeholder benefits, respecting local customs and values and maintaining high conservation values. Project developers must document stakeholder dialogues and indicate if and how the project proposal was revised based on such input. A plan must be developed to continue communication and consultation between project managers and all community groups about the project and its impacts to facilitate adaptive management throughout the life of the project.

Findings: During the initial assessment, The proponent did not document and defend how communities and other stakeholders potentially affected by the project activities have been identified and have been involved in project design activities related to maintaining high conservation values (HCVs). The proponent had not indicated if and how the project proposal was revised based on input from stakeholder consultation. In response, proponent updated the PDD based on the HCV assessment, socialization meetings, and planning workshops held post-evaluation. Supplemental annexes of meeting activities and reports, including a stakeholder communication plan, were provided as evidence. Clarification on Dr. Ferguson’s thesis work and its relevance to the PDD was provided.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 31

New Information Requests: None

Opportunities for Improvement: OFI 32

Indicator G3.9. Describe what specific steps have been taken, and communications methods used, to publicize the CCBA public comment period to communities and other stakeholders and to facilitate their submission of comments to CCBA. Project proponents must play an active role in distributing key project documents to affected communities and stakeholders and hold widely publicized information meetings in relevant local or regional languages.

Findings: In addition to posting the project design document on the CCBA website (<http://www.climate-standards.org>) for public commenting, the document will be available in Spanish and will be disseminated through the local councils to provide members of the territory and stakeholders the opportunity to provide comments. The translated document will be available in the project office in Acandí as well as being distributed to local government officials and local NGOs. Comments will be collected by COCOMASUR, sent to The proponent, translated into English and submitted to CCB. There will also be an anonymous commenting mechanism through local internet cafes that will collect and submit comments to CCB.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator G3.10. Formalize a clear process for handling unresolved conflicts and grievances that arise during project planning and implementation. The project design must include a process for hearing, responding to and resolving community and other stakeholder grievances within a reasonable time period. This grievance process must be publicized to communities and other stakeholders and must be managed by a third party or mediator to prevent any conflict of interest. Project management must attempt to resolve all reasonable grievances raised, and provide a written response to grievances within 30 days. Grievances and project responses must be documented.

Findings: During the initial review, The proponent cited first or second party local and high councils through COCOMASUR as the first step in conflict resolution. If those mechanisms failed, then a case would be referred to a third party. According to the CCB standard, the grievance process must be managed by a third party or mediator to prevent any conflict of interest. As described in the first version of the PDD, The proponent's process did not conform to this CCB requirement. In response, The proponent identified an already-existing 3rd party mechanism operated by the Office of Internal Control of the municipality of Acandí that manages the entire process. Procedures are documented in annexes and are familiar to local residents.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 33

New Information Requests: None

Opportunities for Improvement: None

Indicator G3.11. Demonstrate that financial mechanisms adopted, including projected revenues from emissions reductions and other sources, are likely to provide an adequate flow of funds for project implementation and to achieve the anticipated climate, community and biodiversity benefits.

Findings: Estimates of project costs are based on extensive socio-economic analyses of livelihoods in the Darien region and reflect an appropriate degree of risk and uncertainty in opportunity costs. Estimated net carbon revenues from the project, totaling approximately US\$9 million over 30 years, are expected to exceed all inflation-adjusted implementation and monitoring costs for the project. Funds will be distributed to the communities for community benefit, rather than individual benefit (e.g., community-owned enterprises, infrastructure). The proponent has engaged the Fondo para la Acción Ambiental (FAA) to oversee distribution of benefits to communities. The FAA has stringent administrative and accounting standards to track all funds and ensure that they are used to implement proposed projects.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

3.2.4. G4 – Management Capacity and Best Practices

The success of a project depends upon the competence of the implementing management team. Projects that include a significant capacity-building (training, skill building, etc.) component are more likely to sustain the positive outcomes generated by the project and have them replicated elsewhere.

Best practices for project management include: local stakeholder employment, worker rights, worker safety and a clear process for handling grievances.

The project proponent must:

Indicator G4.1. Identify a single project proponent which is responsible for the project’s design and implementation. If multiple organizations or individuals are involved in the project’s development and implementation the governance structure, roles and responsibilities of each of the organizations or individuals involved must also be described.

Findings: Project implementation will be overseen by a Steering Committee responsible for approving the annual disbursement of funding conditional on project milestones being

achieved. The specific roles of each of the project partners are outlined a table in the section. The proponent is responsible for project design and planning, and oversight of implementation, monitoring and implementation. The roles of partners are also described in the same table.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator G4.2. Document key technical skills that will be required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills. Document the management team’s expertise and prior experience implementing land management projects at the scale of this project. If relevant experience is lacking, the proponent must either demonstrate how other organizations will be partnered with to support the project or have a recruitment strategy to fill the gaps.

Findings: During the initial assessment, not all of the organizations in Table 31 (p. 116) in the first PDD are included in the description of G.4.2 on p. 115. As such, The proponent did not document key technical skills that will be required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills. Rather, in Table 31 it had listed community engagement, biodiversity assessment, carbon measurement, and monitoring as skills, which does not meet the intent of the indicator. This portion of indicator G.4.2. was addressed somewhat inconsistently in Table 31: "Document the management team’s expertise and prior experience implementing land management projects at the scale of this project. If relevant experience is lacking, the proponent must either demonstrate how other organizations will be partnered with to support the project or have a recruitment strategy to fill the gaps." In some cases, the 'source of experience' described what actions will be taken, rather than the source of the experience. In the update of the PDD, the proponent redid the table (Table 24) so that key technical skills are matched with the source of expertise, which references personal and organizations involved.

During the initial assessment, interviews with community members and the project proponent revealed a lack of training in forest mensuration and monitoring. Members also expressed interest in receiving training on carbon markets and standards. In response, the proponent revised section 4.2. with new partner additions covering forest measurement and monitoring, trail building and maintenance, botanical training, and participatory facilitation methods for community planning and development. Training of community members is also outlined in an annex.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 34, 35

New Information Requests: None

Opportunities for Improvement: None

Indicator G4.3. Include a plan to provide orientation and training for the project’s employees and relevant people from the communities with an objective of building locally useful skills and knowledge to increase local participation in project implementation. These capacity building efforts should target a wide range of people in the communities, including minority and underrepresented groups. Identify how training will be passed on to new workers when there is staff turnover, so that local capacity will not be lost.

Findings: Although the proponent includes a plan to provide training/ orientation through modifying the terms of reference of contracted activities, The proponent did not identify how training will be passed on to new workers when there is staff turnover so that local capacity will not be lost during the initial assessment. In response, the proponent revised the PDD to include a training plan annex, which includes a plan to make a human resources manual so that skills for occupations are documented. External consultants are required to work with a local community member to transfer skills and share results of work. Trained project staff are required to work on the project for at least one year. Staff turnover and transfer of skills will also be addressed in the human resource manual. A comprehensive forest monitoring team training plan will be developed in March 2012 to address botanical and carbon inventory training.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 36

New Information Requests: None

Opportunities for Improvement: OFI 37

Indicator G.4.4. Show that people from the communities will be given an equal opportunity to fill all employment positions (including management) if the job requirements are met. Project proponents must explain how employees will be selected for positions and where relevant, must indicate how local community members, including women and other potentially underrepresented groups, will be given a fair chance to fill positions for which they can be trained.

Findings: From the PDD: “As a matter of policy, local community members will be prioritized in hiring decisions. Where there is a lack of local talent that meets the job requirements, the project will recruit from the region, nationally or internationally, as appropriate. When local talent is not available, at least one local counterpart will be assigned to accompany and assist the person recruited to carry out the work—building in a capacity building component to each Terms of Reference. The hiring process will adhere to policy and procedures agreed upon by the Steering Committee to ensure fairness, equal opportunity and representation.” The proponent has at least one local management representative already based in Acandí and is in the process of identifying occupations and local community members interested in positions in project implementation and monitoring.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator G4.5. Submit a list of all relevant laws and regulations covering worker’s rights in the host country.

Describe how the project will inform workers about their rights. Provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved.

Findings: In the initial assessment, The proponent did not describe how the project will inform workers about their rights. In response, the proponent revised the PDD to include a section on Colombian Labor laws in Annex 15 and an explanation of basic contracting requirements in section G4.5. The development of the human resources manual will also include procedures for communicating work rights (Annex 14).

Conformance: Yes No N/A

Non-Conformity Reports: NCR 38

New Information Requests: None

Opportunities for Improvement: None

Indicator G4.6. Comprehensively assess situations and occupations that pose a substantial risk to worker safety. A plan must be in place to inform workers of risks and to explain how to minimize such risks. Where worker safety cannot be guaranteed, project proponents must show how the risks will be minimized using best work practices.

Findings: During the initial assessment, The proponent did not have a plan in place to inform workers of risks and to explain how to minimize such risks. This may be implied, but was not explicitly stated. In response, proponent included in the PDD a brief description of how risks to worker safety are identified and addressed in accordance to ILO guidelines for the forestry sector. The training plan cited in G4.5 also addresses informing workers of risks.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 39

New Information Requests: None

Opportunities for Improvement: None

Indicator G4.7. Document the financial health of the implementing organization(s) to demonstrate that financial resources budgeted will be adequate to implement the project.

Findings: Initial assessment: As no figures are provided in this section, The proponent cannot demonstrate that expected revenues will be greater than or equal to costs. Therefore, it cannot demonstrate that financial resources budgeted will be adequate to implement the project.

Update: Section G4.7 of the PDD has been updated to include a reference to Confidential Annex CA 25, which contains confidential estimated financial projections based on the project development timeline, costs, and revenue.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 40

New Information Requests: None

Opportunities for Improvement: None

3.2.5. G5 – Legal Status and Property Rights

The project must be based on a solid legal framework (e.g., appropriate contracts are in place) and the project must satisfy applicable planning and regulatory requirements.

During the project design phase, the project proponent should communicate early on with relevant local, regional and national authorities in order to allow adequate time to earn necessary approvals. The project design should be sufficiently flexible to accommodate potential modifications that may arise as a result of this process.

In the event of unresolved disputes over tenure or use rights to land or resources in the project zone, the project should demonstrate how it will help to bring them to resolution so that there are no unresolved disputes by the start of the project.

Based on information about current property rights provided in **G1**, the project proponent must:

Indicator G5.1. Submit a list of all relevant national and local laws and regulations in the host country and all applicable international treaties and agreements. Provide assurance that the project will comply with these and, where relevant, demonstrate how compliance is achieved.

Findings: Initial assessment: The proponent provides a list of all relevant national and local laws, and applicable international agreements. It states in its PDD that it will take into account all applicable international treaties and agreements, as well as national laws. At this point, many of the cited laws have the potential to be used to support project activities should the need arise. Some agreements will be complied with by protecting the forest resource. There are agreements cited between Anthroctect and the communities of COCOMASUR that address issues of legality. However, The proponent could provide an explicit statement in the PDD on how the project will comply with these applicable agreements and laws.

Update: The proponent provided an updated PDD in which the table was clarified to show the relevance of a law or regulation to the project and how it demonstrates compliance. Annex 16 was provided for an overview of the legal framework, including national and international laws and agreements. Additionally, the proponent added a statement of commitment to complying with all relevant international treaties and agreement and national laws. The proponent provided evidence of a legal analysis to demonstrate that prior consultation is not necessary for this project, especially since the project proponents include the members of the collective black territory, COCOMASUR.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 41, 42

Opportunities for Improvement: None

Indicator G5.2. Document that the project has approval from the appropriate authorities, including the established formal and/or traditional authorities customarily required by the communities.

Findings: This section originally presented an overview of how authority/approval is established, not that approval of the project has been established through the appropriate authorities, including the established formal and/or traditional authorities customarily required by the communities.

Update: PDD was updated with the follow information and evidence in the form of annexes was provided to the validator: The appropriate authority for project approval is the “Acta” of the General Assembly of COCOMASUR, the highest body of authority of the territory, on whose behalf the legal representative acts. The General Assembly voted in favor of the project on October 9, 2010. A study commission was formed to review the contract. On October 18th, the study commission issued final approval and authorized the legal representative to sign the contract between the two parties, COCOMASUR and Anthroctect. As explained in NIR 42 “Consulta Previa,” there is no legal basis for the application of the consulta previa law to conservation projects owned by a community. Neither is there any formal authorization required by the state for such a community conservation initiative that will have no foreseeable negative social, cultural or environmental impacts.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 43

New Information Requests: None

Opportunities for Improvement: None

Indicator G5.3. Demonstrate with documented consultations and agreements that the project will not encroach uninvited on private property, community property, or government property and has obtained the free, prior, and informed consent of those whose rights will be affected by the project.

Findings: Initial assessment: The project will not encroach uninvited on private property, community property, or any other government property. The project will only undertake activities on areas previously defined through an internal territorial ordering *ordenamiento territorial* process approved by the local community authorities through official acts. This exercise will determine the exact geographic coordinates of all project activities within the territory and the resulting plan and activities will be the subject of a new and specific legal agreement that determines where project activities are permitted. This agreement will be signed by the legal representative of the territory after approval of the plan and the agreement by the high council. During the field visit, access to the collective territory required crossing an adjacent landowner's property. This was not addressed in the PDD.

Update: PDD was updated with the following: According to Article 13 of the Law 70 of 1993—the legal framework of black communities, “and grants will be subject to any necessary easements for the development of adjacent lands. Similarly, bordering lands that are property of the State will be subject to the necessary easements for the benefit of the lands of the communities in accordance with the current legislation.” Therefore, in the event that access is required to areas of the project that have been previously delimited and zoned, this can be managed by establishing easements without affecting the rights of the neighboring landowners. At present, no formal easements are in place as it has been customary for the community to access its territory with the permission of neighboring landowners and formal easement has not been required.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 44

New Information Requests: None

Opportunities for Improvement: None

Indicator G5.4. Demonstrate that the project does not require the involuntary relocation of people or of the activities important for the livelihoods and culture of the communities. If any relocation of habitation or activities is undertaken within the terms of an agreement, the project proponent must demonstrate that the agreement was made with the free, prior, and informed consent of those concerned and includes provisions for just and fair compensation.

Findings: The project activities will not involve the resettlement of any communities or households. The project activities will not involve the resettlement of any communities or households. The collective territory where project activities are undertaken is not located in the populated areas corresponding to the 9 local councils and their respective 31 villages where the members of the territory live.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator G5.5. Identify any illegal activities that could affect the project’s climate, community or biodiversity impacts (e.g., logging) taking place in the project zone and describe how the project will help to reduce these activities so that project benefits are not derived from illegal activities.

Findings: The proponent explains that the project and its associated activities will serve as a disincentive for the incursion of armed groups and illicit crop production as collective territories that participate in the cultivation of illicit crops can have their titles revoked. The proponent aims to adjust the management plan in the event of any new type of illegal activity and the actions required to address them. The proponent explains how illegal activities will be identified, but has NOT identified in this section illegal activities that could affect the project’s climate, community or biodiversity impacts (e.g., illegal logging) taking place in the project zone and has not described how the project will help to reduce these activities so that project benefits are not derived from illegal activities.

Update: Section G5.5 of the PDD has been revised to include a comprehensive analysis of potential illegal activities in the project zone, including illicit trafficking, as well as a suite of actions designed to mitigate the impact of such activities. The project proponent, together with a community task force on territorial control and vigilance, have designed a plan to monitor and respond to any illegal activities that may occur in the project area (Annex CA 14). In particular, this plan includes protocols for investigating and sanctioning suspected violations of regulations on land use.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 45

New Information Requests: NIR 46

Opportunities for Improvement: None

Indicator G5.6. Demonstrate that the project proponent has clear, uncontested title to the carbon rights, or provide legal documentation demonstrating that the project is undertaken on behalf of the carbon owners with their full consent. Where local or national conditions preclude clear title to the carbon rights at the time of validation against the Standards, the project proponent must provide evidence that their ownership of carbon rights is likely to be established before they enter into any transactions concerning the project’s carbon assets.

Findings: Initial assessment: The environmental services (soils and forests) generated on the lands of black communities that have been granted collective titles as Afro-Colombian collective territories are the property of the community landholders, according to article 6 of Law 70 of 1993. The CCB evaluation team viewed legal documents that establish the rights of the territory (surface soils and forests) to COCOMASUR. Since the forests contain the carbon, the carbon belongs to the community. Anthroctec has an agreement to undertake the project on COCOMASUR’s behalf, but does not take ownership of the carbon or any derived emissions reductions or carbon credits. Anthroctec has not documented evidence in the PDD that the project is undertaken on behalf of the carbon owners with their full consent and that the owners have clear uncontested title to the carbon rights. Although the project area belongs to COCOMASUR, the subsurface rights may belong to the state. It is therefore questionable if the proponent could claim rights to subsurface carbon in the future, such as roots and soil (NOTE: these carbon pools are not currently claimed in the project). Where local or national conditions preclude clear title to the carbon rights at the time of validation against the CCB Standards, Anthroctec must provide evidence that the ownership of carbon rights of COCOMASUR is likely to be established before they enter into any transactions concerning the project’s carbon assets.

Update: 1) Submission of evidence that the project is undertaken on the behalf of the carbon owners with their full consent with two annexes: “Acta Asamblea General 10/9/2010,” and “COCOMASUR Autorizacion Comision de Estudio 10/18/2010.”

2) Annex, Legal concept, “Concepto Juridico sobre los derechos subsuelo y carbono” describes the legal framework for soil and subsoil resources and carbon, demonstrating the clear and uncontested rights of COCOMASUR to the carbon in its forests, roots and soil, which are considered “soil” rather than “subsoil.” Article 15 of the Law 70 establishes the rights to the sustainable use of *renewable* natural resources of collective territories, therefore including ecosystem services.

3) There are currently no concessions within the territory for mining exploration (see annex, Map of Mining Concessions). A consultation process would be required if the state were to explore non-renewable subsoil resources within the territory of COCOMASUR.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 47

Opportunities for Improvement: None

3.3. Climate Section

3.3.1. CL1 – Net Positive Climate Impacts

The project must generate net positive impacts on atmospheric concentrations of greenhouse gases (GHGs) over the project lifetime from land use changes within the project boundaries.

The project proponent must:

Indicator CL1.1. Estimate the net change in carbon stocks due to the project activities using the methods of calculation, formulae and default values of the IPCC 2006 GL for AFOLU or using a more robust and detailed methodology. The net change is equal to carbon stock changes *with* the project minus carbon stock changes *without* the project (the latter having been estimated in **G2**). This estimate must be based on clearly defined and defensible assumptions about how project activities will alter GHG emissions or carbon stocks over the duration of the project or the project GHG accounting period.

Findings: Initial assessment: The proponent has not provided an estimate the net change in carbon stocks that are expected due to the project activities using the methods of calculation, formulae and default values of the IPCC 2006 GL for AFOLU or using a more robust and detailed methodology.

Update: See section CL.1.1 of revised PDD. Tables and figures added per VM0009. NEW INFORMATION PROVIDED: Reference to Appendix 5 added. The net change in carbon stocks due to project activities are now based on an approved VCS methodology, IPCC defaults and published literature values.

The CCB Standards (CL1.1) require that the proponent: “Estimate the net change in carbon stocks due to the project activities using the methods of calculation, formulae and default values of the IPCC 2006 GL for AFOLU or using a more robust and detailed methodology. The net change is equal to carbon stock changes with the project minus carbon stock changes without the project (the latter having been estimated in G2). This estimate must be based on clearly defined and defensible assumptions about how project activities will alter GHG emissions or carbon stocks over the duration of the project or the project GHG accounting period.”

The PDD text clearly references the VM0009 methodology for calculation of projected carbon stocks. However, there is no mention of “clearly defined and defensible assumptions about how project activities will alter GHG emissions or carbon stocks over the duration of the project or the project GHG accounting period.”

The finding was when the assumptions related to projection of future carbon stocks were adequately defined and defended in the PDD. There is now text in CL 1.1 that enumerates the assumptions implicit in the project activities as they affect the projections of future carbon stocks. A description of the assumptions related to projected future carbon stocks has been added. Project activities have been related to expected outcomes in terms of carbon stocks. For example, the expected effect of monitoring is to protect the forest resource and detect potential threats.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 48

New Information Requests: None

Opportunities for Improvement: None

Indicator CL1.2. Estimate the net change in the emissions of non-CO2 GHG emissions such as CH4 and N2O in the *with* and *without* project scenarios if those gases are likely to account for more than a 5% increase or decrease (in terms of CO2-equivalent) of the project’s overall GHG emissions reductions or removals over each monitoring period.

Findings: No net change in emissions in Non-Co2 gases is foreseen as a result of the project. Deforestation and degradation are not significant sources of non-CO2 gases such as CH4 and N2O. For this reason they have not been included in calculations for the 'with' project scenario because they amount to less than 5%.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator CL1.3. Estimate any other GHG emissions resulting from project activities. Emissions sources include, but are not limited to, emissions from biomass burning during site preparation, emissions from fossil fuel combustion, direct emissions from the use of synthetic fertilizers, and emissions from the decomposition of N-fixing species.

Findings: Initial assessment: No burning is planned as part of project activities, since there is no need for construction of fire breaks, for example, in such a wet region. The largest predicted source of project emissions from the project activities are those generated from electricity, vehicles and flights by The proponent staff outside of the project area. These emissions are still estimated to be well below 1% of the total project carbon benefits. Agricultural activities are not planned within the project area; therefore no significant sources of N2O emissions are foreseen as a result of the project’s activities.

Update: The proponent was asked to “Estimate any other GHG emissions resulting from project activities.” Some sources of project-scenario sources of emissions are listed, but the proponent has not “estimated” the GHG emissions, as requested, merely stating that they are below 1% of the total project carbon benefits. The intent of NIR 2011.49 was that the proponent account for “other emissions” resulting from project activities. The CCB Standards require that these emissions be accounted for, regardless of how minimal they are estimated to be (the language of indicator CL1.3 does not make any reference to any sort of “*de minimis*” threshold, unlike the language for indicator CL1.2). Furthermore, the “Rules for the use of the Climate, Community & Biodiversity Standards”, page 6, states that “The project design documentation (PDD) is a detailed description of the project and the ways in which it meets the required and optional criteria of the CCB Standards”, indicating that the PDD must describe conformance to all criteria. Therefore, the proponent’s statement in the findings form that “Other emissions from project activities were estimated at .3% of total emissions” was not sufficient. In response, The proponent has subtracted project emissions from the gross NERs. This was documented in CA26:

Ex-Ante Credit Generation. The EPA methodology is cited in the PDD, and Annex CA 35 has been converted to Table 28 in the PDD. Annex CA 26 is now updated with the data from Table 28.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 49

Opportunities for Improvement: None

Indicator CL1.4. Demonstrate that the net climate impact of the project is positive. The net climate impact of the project is the net change in carbon stocks plus net change in non-CO2 GHGs where appropriate minus any other GHG emissions resulting from project activities minus any likely project-related unmitigated negative offsite climate impacts (see CL2.3).

Findings: Initial assessment: Without considering leakage, the project is expected to prevent the emission of an estimated 1,460,000 mtCO₂e over the 30 year project lifespan, representing a clear positive climate impact. It is unclear where this number comes from. The proponent must explain how the calculation was done in a transparent manner. The number is higher than would be calculated by multiplying the summed carbon stock benefit in the table for indicator CL1.1 (313,890) by 44/12 (to convert C to CO₂e). In addition, the proponent is required to include leakage (a.k.a. “any likely project-related unmitigated negative offsite climate impacts”) in this calculation, and the proponent specifically stated that this was not done.

Update: This finding is out of date. The value 313,890 could not be found in Table 27, CL1.1, or in the CA26 workbook. In addition, the proponent is now accounting for leakage in the PDD under VM0009 Methodology, which is different from the original methodology selected. Appendix 5 demonstrates step by step calculations for NER generation and was adjusted to include leakage. The net climate impact of the project is clearly positive and is supported by the Dinamica model and the VM0009 methodology. New Information Provided: Annex CA 26: Ex-Ante Credit generation

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 50

Opportunities for Improvement: None

Indicator CL1.5. Specify how double counting of GHG emissions reductions or removals will be avoided, particularly for offsets sold on the voluntary market and generated in a country with an emissions cap.

Findings: The carbon credits generated from the project will be registered under the Voluntary Carbon Standard and sold under that mechanism. Credits from the project will not be registered or sold under any current regulatory scheme, as these schemes currently only allow for Afforestation or Reforestation credits to be sold. If and when the credits become eligible under a regulatory scheme, the proper procedures will be taken to ensure that credits are not sold twice. In addition, Anthrotect (as the Seller and aggregator of credits) maintains an agreement with community landholders (COCOMASUR) to ensure that credits are only sold by Anthrotect so that duplicate sales of the same credits cannot occur.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

3.3.2. CL2 – Offsite Climate Impacts (‘Leakage’)

The project proponent must quantify and mitigate increased GHG emissions that occur beyond the project area and are caused by project activities (commonly referred to as ‘leakage’).

The project proponent must:

Indicator CL2.1. Determine the types of leakage that are expected and estimate potential offsite increases in GHGs (increases in emissions or decreases in sequestration) due to project activities. Where relevant, define and justify where leakage is most likely to take place.

Findings: The proponent identifies shifting cultivation, and displacement of cattle ranching and various classes of selective logging as potential types of leakage. The proponent was asked to define the extent of the leakage belt used to determine the potential GHG emissions from leakage (e.g., cattle ranching, illegal logging). In addition, for this indicator, the proponent is required to “estimate potential offsite increases in GHGs (increases in emissions or decreases in sequestration) due to project activities.” This does not appear to have been done. This also requires the identification of types and sources of leakage.

In the revised PDD section CL 2.1, *identification of types and source of leakage and definition of the leakage belt*, this issue has been addressed. As per VM0009, leakage due to project emissions was estimated. Section G 3.3 now includes a map of the leakage area. New Information Provided: CA 26: Ex-Ante Credit Generation. The types of leakage that may be expected have been adequately described. Please see the leakage estimates in Table 27, p. 107 of in v.8.59. A conservative estimate of 20% leakage from the gross NERs was deducted.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 51

Opportunities for Improvement: None

Indicator CL2.2. Document how any leakage will be mitigated and estimate the extent to which such impacts will be reduced by these mitigation activities.

Findings: The proponent documents how negative leakage will be mitigated. Five types of leakage are described in section CL2.1, but mitigation actions are described for only three types. Please clarify whether or not the three types of selective logging identified in CL2.1 fall under one category in CL2.2. In addition, clarify if any of the mitigation activities take place within the 'project area' or 'project zone' "and estimate the extent to which such impacts (i.e. leakage) will be reduced by these mitigation activities."

Update: The organizational system employed in Section CL2.1 may be slightly different, as now only four types of leakage are defined. However, each type of leakage discussed is also now addressed in Section CL2.2, and activities designed to mitigate each type of leakage are described. The NIR requested that the proponent "clarify if any of the mitigation activities take place within the 'project area' or 'project zone'". SCS is not sure if this has been done. The columns "Project Area" and "Project Zone" in Table 28 may contain some information to this effect. Note that, for each leakage category, the percentage values in the two columns sum to 100%. The NIR also requested that the proponent "estimate the extent to which such impacts (i.e. leakage) will be reduced by... mitigation activities", as required by the CCB Standards. It is unclear of the estimation required is quantitative or qualitative in nature, but the proponent appears to have opted for the qualitative approach. The column in Table 28 entitled "Impact" appears to be designed to address the request.

The proponent provided additional explanatory information to clarify the meaning of the columns "Project Area", "Project Zone" and "Impact". These percentages are meant to indicate the apportionment of the leakage mitigation activities between the project area and project zone. Impact refers to the effect of the mitigation activities on leakage from the project area. An explanation of the meaning of the columns was added to the PDD.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 52

Opportunities for Improvement: None

Indicator CL2.3. Subtract any likely project-related unmitigated negative offsite climate impacts from the climate benefits being claimed by the project and demonstrate that this has been included in the evaluation of net climate impact of the project (as calculated in **CL1.4**).

Findings: The proponent claims zero unmitigated negative offsite climate impacts from the climate benefits being claimed by the project. If the claims of no leakage can be justified, the level of detail given in this indicator is satisfactory. However, The proponent's response to this indicator may need to be updated if there are changes to CL2.1 and CL2.2.

Update: Leakage from project-related activities was calculated as per methodology VM0009 at 20% and subtracted from Gross Emissions Reductions (NERs). See also: Annex CA 26: Ex-ante credit generation Since the proponent is now not making a claim of 0% leakage, this NIR may be out of date. A claim of 20% leakage is now being made. Apparently this originates from the VM0009 methodology; although the guidance in the VM0009 methodology is quite complex and SCS doubts it would lead to a nice round number like 20% if followed exactly. Nonetheless, the language for indicator CL2.3 does not require a specific methodology to be followed. The proponent does not anticipate that leakage would negate the climate benefits of the project. VM0009, section 11.3 reads “Since ex-ante data for leakage monitoring are unlikely to be available, ex-ante estimates of leakage should be estimated using expert knowledge and, if available, experience with past projects. . . it is conservative . . . to overestimate leakage.” The proponent used expert knowledge of the project area and region, in addition to knowledge of other estimates of leakage in the most similar projects we could find, and then generated a conservative (round) number of 20% for ex-ante leakage estimates.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 53

Opportunities for Improvement: None

Indicator CL2.4. Non-CO2 gases must be included if they are likely to account for more than a 5% increase or decrease (in terms of CO2-equivalent) of the net change calculations (above) of the project’s overall off-site GHG emissions reductions or removals over each monitoring period.

Findings: The proponent claims that non-CO2 gases account for less than 5% of emissions, and are expected to be offset by mitigation activities described in CL1.2.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None.

3.3.3. CL3 – Climate Impact Monitoring

Before a project begins, the project proponent must have an initial monitoring plan in place to quantify and document changes (within and outside the project boundaries) in project-related carbon pools, project emissions, and non-CO₂ GHG emissions if appropriate. The monitoring plan must identify the types of measurements, the sampling method, and the frequency of measurement.

Since developing a full monitoring plan can be costly, it is accepted that some of the plan details may not be fully defined at the design stage, when projects are being validated against the Standards. This is acceptable as long as there is an explicit commitment to develop and implement a monitoring plan.

The project proponent must:

Indicator CL3.1. Develop an initial plan for selecting carbon pools and non-CO₂ GHGs to be monitored, and determine the frequency of monitoring. Potential pools include aboveground biomass, litter, dead wood, belowground biomass, wood products, soil carbon and peat. Pools to monitor must include any pools expected to decrease as a result of project activities, including those in the region outside the project boundaries resulting from all types of leakage identified in CL2. A plan must be in place to continue leakage monitoring for at least five years after all activity displacement or other leakage causing activity has taken place. Individual GHG sources may be considered ‘insignificant’ and do not have to be accounted for if *together* such omitted decreases in carbon pools and increases in GHG emissions amount to less than 5% of the total CO₂-equivalent benefits generated by the project. Non-CO₂ gases must be included if they are likely to account for more than 5% (in terms of CO₂-equivalent) of the project’s overall GHG impact over each monitoring period. Direct field measurements using scientifically robust sampling must be used to measure more significant elements of the project’s carbon stocks. Other data must be suitable to the project site and specific forest type.

Findings: Initial assessment: The proponent has not developed the initial plan for selecting carbon pools and non-CO₂ GHGs to be monitored, and has not described the frequency of monitoring.

Update: The proponent revised CL3.1. New Information Provided: A figure for planned transects added, and frequency of monitoring altered. A reference to a measurement protocol was also added. Carbon pools have been selected per section G.1.4. An initial plan for monitoring and the frequency of monitoring have been developed. VM0009 will be used to monitor activity-shifting leakage. All data collected will be suitable to project site and specific forest type.

For potentially affected pools within the project area, the PDD does contain the basic required information regarding the monitoring to be performed (the CCB Standards allow the proponent to defer development of a full monitoring plan at the validation stage). However, the PDD does not contain any information regarding monitoring of pools affected by the types of leakage identified in CL2. Furthermore, the PDD does not contain a demonstration that any individual GHG sources or non-CO₂ gases (such as GHG emissions from fossil fuel use, which the proponent does not currently plan to monitor) are not likely to account for more than 5% of the project’s overall GHG impact over each monitoring period. Leave NCR 2011.54 open until the deficiencies identified in the final paragraph of the “Comments” section have been rectified.

The monitoring plan detailed in the PDD provides an explanation of the monitoring plan for leakage. This monitoring will cover all pools likely to decrease in the project. As indicated in the PDD, VM0009's methodology for monitoring leakage will be used. This can be found in Annex CA 23 and is part of the public record. The monitoring plan is in 10.3.2, p 65 of VM0009. No project activities will lead to the production of non-CO2 GHG emissions above that of the baseline. There will be no draining of currently inundated lands or inundation of currently dry areas in the project above and beyond the baseline. Non-CO2 gases should thus net to zero.

The placement of transects within the Project Area could be used to detect any land use change expected on the Project Area. The forest carbon pools selected, such as aboveground non-tree biomass, would be expected to pick up land use changes due to selective logging on the Project Area as non-tree biomass would be expected to increase in the short term relative to tree biomass as a result of selective logging. Ranching and shifting agriculture would be expected to clear most any forest vegetation and would therefore also be detected during measurements on the Project Area. Estimations for emissions of non-CO2 gases are expected to be negligible per CL1.3 and do not need to be monitored per this CCB requirement. Based on the pools selected to monitor, it can reasonably be inferred that any GHG emissions sources resulting in the project area from carbon pools would be detected if they were above 5% of the total CO2e benefits expected by the project. CL3.1 now updated to indicate the project developer's intent to monitor leakage per the CCB standard using the VM0009 methodology for monitoring leakage, monitoring at least to five years after activity shifting leakage has taken place.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 54

New Information Requests: None

Opportunities for Improvement: None

Indicator CL3.2. Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.

Findings: Initial assessment: The proponent has not committed to developing a full monitoring plan within six months of the project start date or within twelve months of validation.

Update: The proponent added a statement to the PDD to commit to developing a full plan for monitoring carbon pools in the project area within 12 months of validation against the CCB standards. An open monitoring platform through a partnership with Carnegie Institution and Google Earth for the storage and display of forest biodiversity and carbon data will enable external donors, policymakers and the global public to understand the ecosystem services being provided by the communities, as well as ensure transparency and wide distribution of the data to the scientific community and greater public.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 55

New Information Requests: None

Opportunities for Improvement: None

3.4. Community Section

3.4.1. CM1 – Net Positive Community Impacts

The project must generate net positive impacts on the social and economic well-being of communities and ensure that costs and benefits are equitably shared among community members and constituent groups during the project lifetime.

Projects must maintain or enhance the High Conservation Values (identified in **G1**) in the project zone that are of particular importance to the communities' well-being.

The project proponent must:

Indicator CM1.1. Use appropriate methodologies to estimate the impacts on communities, including all constituent socio-economic or cultural groups such as indigenous peoples (defined in **G1**), resulting from planned project activities. A credible estimate of impacts must include changes in community well-being due to project activities and an evaluation of the impacts by the affected groups. This estimate must be based on clearly defined and defensible assumptions about how project activities will alter social and economic well-being, including potential impacts of changes in natural resources and ecosystem services identified as important by the communities (including water and soil resources), over the duration of the project. The 'with project' scenario must then be compared with the 'without project' scenario of social and economic well-being in the absence of the project (completed in **G2**). The difference (i.e., the community benefit) must be positive for all community groups.

Findings: Initially, the proponent identifies several communities in section G.1.5, but does not estimate the impacts on all constituent socio-economic or cultural groups, such as indigenous peoples, listed in the section. No evaluation of the impacts by the affected groups has been presented or referenced, including potential impacts of changes in natural resources and ecosystem services identified as important by the communities (including water and soil resources) over the duration of the project. Based on the information that the proponent has already provided in CM1.1 and with the evaluation from communities, the 'with project' scenario must then be compared with the 'without project' scenario of social and economic well-being in the absence of the project (completed in G2). The difference (i.e., the community benefit) must be positive for all community groups.

Update: The PDD has been updated to include a reiteration of baseline, 'without project' social scenario followed by an explanation of positive social impact expected from the project that

addresses the baseline points described. An explanation of how socioeconomic data will be gathered throughout the project has been provided. The proponent has clarified that an expected benefit of the project is to define and clarify usufruct rights.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 56

New Information Requests: NIR 57

Opportunities for Improvement: None

Indicator CM1.2. Demonstrate that no High Conservation Values identified in **G1.8.4-6** will be negatively affected by the project.

Findings: Initial assessment: The proponent has tentatively classified the entire project area as HCV in G.1.8 and has identified several development goals for the region, such as building communication infrastructure, promoting different agricultural practices, and attaining FSC certification for some forest areas. Some of these development goals and management activities may be compatible with the prevention of negative impacts to HCVs, while others may not be as currently described. As such, the proponent cannot demonstrate that no High Conservation Values identified in G1.8.4-6 will be negatively affected by the project.

Update: An HCV assessment was completed and measures identified for the ongoing maintenance and enhancement of these values. A net positive benefit to HCVs is demonstrated. See revised section CM 1.2; table 22 in section G 3.6 which summarizes positive impact to HCVs. New Information Provided: CA 22: HCV Assessment

Conformance: Yes No N/A

Non-Conformity Reports: NCR 58

New Information Requests: None

Opportunities for Improvement: None

3.4.2. CM2 – Offsite Stakeholder Impacts

The project proponent must evaluate and mitigate any possible social and economic impacts that could result in the decreased social and economic well-being of the main stakeholders living outside the project zone resulting from project activities. Project activities should at least ‘do no harm’ to the well-being of offsite stakeholders.

The project proponent must:

Indicator CM2.1. Identify any potential negative offsite stakeholder impacts that the project activities are likely to cause.

Findings: Initial assessment: The proponent has had minimal contact with some communities in the project zone and has not determined the impacts of project implementation and monitoring activities on neighboring properties and communities. The proponent must conduct an analysis of potential negative offsite (i.e., outside of 'project zone') stakeholder impacts.

Update: Stakeholder analysis exercise was conducted in August at a planning workshop with COCOMASUR members. (Annex CA 18). CM2.1 was updated in PDD to include a discussion on identified potential negative offsite stakeholder impacts, with special emphasis on adjacent indigenous reserves. Most other stakeholders stand to benefit from water catchment protection.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 59

Opportunities for Improvement: None

Indicator CM2.2. Describe how the project plans to mitigate these negative offsite social and economic impacts.

Findings: The proponent has not identified any negative offsite stakeholder impacts as a result of project activities, yet identifies communication strategies and measures (e.g., agricultural intensification) appropriate to mitigate some sort of anticipated impacts.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator CM2.3. Demonstrate that the project is not likely to result in net negative impacts on the well-being of other stakeholder groups.

Findings: The policy and disposition towards migrants living alongside members of the territory is one of inclusion and good will, as they are seen as part of the community. During the field evaluation, members of COCOMASUR indicated that they are willing to keep working with neighboring communities and other stakeholder groups.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

3.4.3. CM3 – Community Impact Monitoring

The project proponent must have an initial monitoring plan to quantify and document changes in social and economic well-being resulting from the project activities (for communities and other stakeholders). The monitoring plan must indicate which communities and other stakeholders will be monitored, and identify the types of measurements, the sampling method, and the frequency of measurement.

Since developing a full community monitoring plan can be costly, it is accepted that some of the plan details may not be fully defined at the design stage, when projects are being validated against the Standards. This is acceptable as long as there is an explicit commitment to develop and implement a monitoring plan.

The project proponent must:

Indicator CM3.1. Develop an initial plan for selecting community variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project’s community development objectives and to anticipated impacts (positive and negative).

Findings: Initial assessment: The project objectives to monitor must be linked to the objectives identified in section G.3.1. They are not as currently described. In addition, the frequency of monitoring and reporting must be defined.

Update: Frequency of monitoring and reporting has been defined in PDD. Monitoring has been linked to project objectives. The monitoring framework will connect to section CM1.1 as initial socioeconomic conditions will be measured there and then selected indicators will be measured during monitoring activities.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 60

New Information Requests: None

Opportunities for Improvement: None

Indicator CM3.2. Develop an initial plan for how they will assess the effectiveness of measures used to maintain or enhance High Conservation Values related to community well-being (G1.8.4-6) present in the project zone.

Findings: Initial assessment: The proponent provides a general description of how HCVs will be monitored, but does address it will assess the effectiveness of measures used to maintain or enhance High Conservation Values related to community well-being (G1.8.4-6) present in the project zone. The following HCV types are addressed in this indicator: 8.4. Areas that provide critical ecosystem services (e.g., hydrological services, erosion control, fire control); 8.5. Areas that are fundamental for meeting the basic needs of local communities (e.g., for essential food, fuel, fodder, medicines or building materials without readily available alternatives); and 8.6. Areas that are critical for the traditional cultural identity of communities (e.g., areas of cultural, ecological, economic or religious significance identified in collaboration with the communities).

2nd review of PDD; The monitoring indicators for HCV6 do not correspond to the values identified in the HCV assessment. For example, it is not clear if monitoring indicators correspond to "protein from forest game, households made of trees and palm trees from the neighboring forest and sand and stone for the foundations carried down from the Serranía by the Tolo and Tanela rivers are important elements of the culture of Acandí rural communities." Also, what monitoring indicators correspond to secondary or mildly transformed habitats? For HCV 4 and 5, monitoring indicators in PDD do not necessarily match those provided in Monitoring Annex.

Update: An HCV assessment was completed with community consultations to identify values present and the areas where they occur in collaboration with community members. Measures to monitor the values identified for HCV 4, 5 and 6 were devised. While HCV 5 and 6 are identified due to the importance of some forest resources, communities are not dependent on these resources for protein or construction materials (p. 29 in HCV assessment). Therefore, no indicators were proposed in the HCV monitoring framework for HCV 6. The "simple hydrological indicators [that] can be used to monitor the amount and the quality of water flowing down the Tolo and Tanela catchments and thus monitor the forest's role in regulating the water cycle in the area" for HCV 5 are the same as those indicators used for HCV 4 in the monitoring framework. The indicator "quality of hydrologic resources" in table 30 in the PDD corresponds to the HCV monitoring framework indicators for HCV 4. Cultural value will be monitored with the social impact tool. The secondary or mildly transformed habitats are part of HCV 6 and the same indicators apply. The initial set of indicators provided for social impact monitoring in table 29 are examples of potential indicators that apply both to forest and secondary areas.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 61

New Information Requests: None

Opportunities for Improvement: None

Indicator CM3.3. Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this

plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.

Findings: Initial assessment: The proponent has explained that the monitoring plan will be made available to communities and the public, but the indicator also requires that the results of monitoring are made available on the internet and are communicated to the communities and other stakeholders.

Update: The proponent added the following text to PDD: Anthrotect commits to developing a full monitoring and communication plan within 12 months of validation against the standard. The social baseline and monitoring plan will be disseminated to the community members through the local councils. Results of social monitoring will be publicly available on the Anthrotect website or a platform created specifically for the project.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 62

New Information Requests: None

Opportunities for Improvement: None

3.5. Biodiversity Section

3.5.1. B1 – Net Positive Biodiversity Impacts

The project must generate net positive impacts on biodiversity within the project zone and within the project lifetime, measured against the baseline conditions.

The project should maintain or enhance any High Conservation Values (identified in **G1**) present in the project zone that are of importance in conserving globally, regionally or nationally significant biodiversity.

Invasive species populations must not increase as a result of the project, either through direct use or indirectly as a result of project activities.

Projects may not use genetically modified organisms (GMOs) to generate GHG emissions reductions or removals. GMOs raise unresolved ethical, scientific and socio-economic issues. For example, some GMO attributes may result in invasive genes or species.

The project proponent must:

Indicator B1.1. Use appropriate methodologies to estimate changes in biodiversity as a result of the project in the project zone and in the project lifetime. This estimate must be based on clearly defined and defensible assumptions. The ‘with project’ scenario should then be

compared with the baseline ‘without project’ biodiversity scenario completed in G2. The difference (i.e., the net biodiversity benefit) must be positive.

Findings: Initial finding: The proponent must compare the ‘with project’ scenario to the baseline ‘without project’ biodiversity scenario completed in G2. The difference (i.e., the net biodiversity benefit) must be positive.

Update: The proponent updated PDD to show that under ‘without project’ scenario that fragmentation and deforestation trends continue, while under the ‘with project scenario,’ conservation and management measures will maintain forest cover and ecosystem integrity, prevent fragmentation, and result in retention and enhancement of cover and connectivity with neighboring Darien National Park. The project will yield a net-positive gain for biodiversity in the project zone, including the habitat of the any endemic, endangered and migratory species present in the project zone.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 63

Opportunities for Improvement: None

Indicator B1.2. Demonstrate that no High Conservation Values identified in G1.8.1-3 will be negatively affected by the project.

Findings: It is unlikely that the project will negatively affect High Conservation Values in G1.8.1-3 as one of the main objectives is preservation of the forest and reduction of forest degradation, as well as reforestation. These HCVs have been partially identified by the proponent and its partners, but the HCV assessment has not been conducted. Upon completion of the HCV assessment, this section should be updated, if warranted.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator B1.3. Identify all species to be used by the project and show that no known invasive species will be introduced into any area affected by the project and that the population of any invasive species will not increase as a result of the project.

Findings: Initial assessment: Trees planted in the project area will be indigenous species wherever possible, with an emphasis on those required for forest regeneration and those known for their multiple values by the community. A reference or list of additional native trees

should be included as planned as it increases the transparency of the project. There is teak (*Tectona grandis*) planted in the project zone that belongs to members of the project. The proponent must provide information that any continued or expanded use of teak or other exotic species, such as mango, by the project proponent in the project zone or project area will not result in them becoming invasive.

Update: A list of native trees for reforestation was provided, including a reference to data on endemic species (Annex 29). The project will not use exotic species in the project area. Mango and teak are commonly planted in the project zone. These species provide livelihoods benefits and do not carry diseases that threaten native species in the project area. The project will focus on increasing production of the more than 40 endemic and near-endemic fruit tree species in the Chocó. The expansion of non-native species that already occur in the project area and are not considered invasive –such as mango and teak, will be considered on a case-by-case basis for cultivation on degraded land outside of the project area to reduce consumption of threatened native species and support livelihoods.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 64, 65

Opportunities for Improvement: None

Indicator B1.4. Describe possible adverse effects of non-native species used by the project on the region’s environment, including impacts on native species and disease introduction or facilitation. Project proponents must justify any use of non-native species over native species.

Findings: The proponent state that mango, which is non-native to the New World, will be used in the project area. Mango was introduced around 500 years ago and is well-established in many parts of the Americas as a fruit tree. As it is typically planted near home sites and other populated areas, its potential to negatively impact intact native forest of the project area is extremely low. However, given the previous misunderstanding between ‘project area’ vs. ‘project zone,’ where mango and any other non-native species will be used in the ‘project area’ and ‘project zone’ must be clarified.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator B1.5. Guarantee that no GMOs will be used to generate GHG emissions reductions or removals.

Findings: The project will neither use nor introduce genetically-modified organisms (GMOs). Agricultural components of the project such as agro-forestry initiatives within the project area also will adhere to this policy.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

3.5.2. B2 – Offsite Biodiversity Impacts

The project proponent must evaluate and mitigate likely negative impacts on biodiversity outside the project zone resulting from project activities.

The project proponent must:

Indicator B2.1. Identify potential negative offsite biodiversity impacts that the project is likely to cause.

Findings: The proponent describes mitigation actions for B2.2, but has not identified any potential negative offsite biodiversity impacts that the project is likely to cause as it does not anticipate any. However, due to the creation of mitigation measures, it is unlikely that there are no anticipated negative impacts.

2nd review: Sea turtles are not aquatic mammals. B.2.2 still addresses mitigation measure for negative impacts not identified in B.2.1, mainly for hunting and construction materials.

Update: The proponent now identifies potential negative impacts to sea turtles. Sea turtles now described as "marine animals." B 2.2 was revised and the reference to the non-biodiversity impacts (construction) was removed. Hunting was left because it is referred to in B 2.1

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 66

Opportunities for Improvement: None

Indicator B2.2. Document how the project plans to mitigate these negative offsite biodiversity impacts.

Findings: The proponent has described measures designed to mitigate negative offsite biodiversity impacts. For example, the cultivation and harvesting of non-timber forest products and medicinal species in home gardens will be used to offset some of the traditional gathering of vulnerable species. Similarly, valuable timber species may be planted outside of the project area in anticipation of future demand.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator B2.3. Evaluate likely unmitigated negative offsite biodiversity impacts against the biodiversity benefits of the project within the project boundaries. Justify and demonstrate that the net effect of the project on biodiversity is positive.

Findings: There are no expected unmitigated negative biodiversity impacts given the community-driven nature of the project and the exceptional benefits expected from forest conservation on the great wealth of flora and fauna in the project zone.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

3.5.3. B3 – Biodiversity Impact Monitoring

The project proponent must have an initial monitoring plan to quantify and document the changes in biodiversity resulting from the project activities (within and outside the project boundaries). The monitoring plan must identify the types of measurements, the sampling method, and the frequency of measurement.

Since developing a full biodiversity-monitoring plan can be costly, it is accepted that some of the plan details may not be fully defined at the design stage, when projects are being validated against the Standards. This is acceptable as long as there is an explicit commitment to develop and implement a monitoring plan.

The project proponent must:

Indicator B3.1. Develop an initial plan for selecting biodiversity variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project’s biodiversity objectives and to anticipated impacts (positive and negative).

Findings: The proponent claims no anticipated negative biodiversity benefits resulting from project activities. The proponent must provide evidence that the methodology and variables selected to be monitored ensure that progress towards meeting objectives identified in G.3.1. can be measured and detect anticipated positive and negative impacts identified.

In addition, the frequency of monitoring and reporting must be defined.

2nd review: Where are negative impacts identified in B2 addressed in monitoring plan? The HCV assessment did not identify sea turtles such as the leatherback (*Dermochelys coriacea*) and the monitoring framework does not include variables that could detect attributes related to the maintenance and/or enhancement of sea turtles.

Update: The proponent removed sea turtles from the scope of the biodiversity framework as they are mostly a marine species, which are not under the scope of CCB since the standard only deals with land use projects. The HCV monitoring framework is expected to measure variables that will detect negative impacts identified in B2. The monitoring methodology is from Rangel and others, known experts on biodiversity in the Chocó-Darién, and is tied in to the methodology used in G.1.7. Monitoring is at least annual and in some cases occurs twice a year. The HCV monitoring framework includes variables capable of measuring progress to meeting objectives in G.3.1, such as migratory bird species.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 67

New Information Requests: None

Opportunities for Improvement: None

Indicator B3.2. Develop an initial plan for assessing the effectiveness of measures used to maintain or enhance High Conservation Values related to globally, regionally or nationally significant biodiversity (G1.8.1-3) present in the project zone.

Findings: Initial assessment: The proponent has not developed an initial plan for assessing the effectiveness of measures used to maintain or enhance High Conservation Values related to globally, regionally or nationally significant biodiversity (G1.8.1-3) present in the project zone. The current plan described emphasizes evaluation of the status of biodiversity and protocols to measure changes in biodiversity rather than assessing the effectiveness of measures used to maintain or enhance HCVs.

Update: Completion of the HCV assessment and monitoring framework, including measures for evaluating the measures in place for maintaining and enhancing HCVs related to globally, regionally or nationally significant biodiversity (G1.8.1-3) present in the project zone. This management framework includes indicators for assessing the effectiveness of measures. The HCV Monitoring Framework Annex (Annex 30) provides monitoring indicators and expected frequency of their monitoring.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 68

New Information Requests: None

Opportunities for Improvement: None

Indicator B3.3. Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.

Findings: Initial assessment: The proponent has not committed to disseminating its biodiversity monitoring plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.

Update: The proponent has updated PDD with the following text: Anthroprotect commits to developing a full monitoring plan within 12 months of validation to the standard. The plan and its results will be disseminated to communities and stakeholders in the project zone, as well as being made publicly available on the internet.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 69

New Information Requests: None

Opportunities for Improvement: None

3.6. Gold Level Section

3.6.1. GL1 – Climate Change Adaptation Benefits

This Gold Level Climate Change Adaptation Benefits criterion identifies projects that will provide significant support to assist communities and/or biodiversity in adapting to the impacts of climate change. Anticipated local climate change and climate variability within the project zone could potentially affect communities and biodiversity during the life of the project and beyond. Communities and biodiversity in some areas of the world will be more vulnerable to the negative impacts of these changes due to: vulnerability of key crops or production systems to climatic changes; lack of diversity of livelihood resources and inadequate resources, institutions and capacity to develop new livelihood strategies; and high levels of threat to species survival from habitat fragmentation. Land-based carbon projects have the potential to help local communities and biodiversity adapt to climate change by: diversifying revenues and livelihood strategies; maintaining valuable ecosystem services such as hydrological regulation, pollination,

pest control and soil fertility; and increasing habitat connectivity across a range of habitat and climate types.

The project proponent must:

Indicator GL1.1. Identify likely regional climate change and climate variability scenarios and impacts, using available studies, and identify potential changes in the local land-use scenario due to these climate change scenarios in the absence of the project.

Findings: The proponent has not identified likely regional climate change and climate variability scenarios and impacts, using available studies, and has not identified potential changes in the local land-use scenario due to these climate change scenarios in the absence of the project. Instead, The proponent describes the most recent La Niña event and how forest cover is necessary to act as a buffer to flooding.

Update: The proponent has decided to fulfill GL3 during the validation assessment. All findings associated with this indicator were therefore rescinded.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 70

New Information Requests: None

Opportunities for Improvement: None

Indicator GL1.2. Identify any risks to the project’s climate, community and biodiversity benefits resulting from likely climate change and climate variability impacts and explain how these risks will be mitigated.

Findings: Anthroctect has not identified any risks to the project’s climate, community and biodiversity benefits resulting from likely climate change and climate variability impacts and has not explained how these risks will be mitigated. Instead, it has explained the importance of conservation and diversity.

Update: The proponent has decided to fulfill GL3 during the validation assessment. All findings associated with this indicator were therefore rescinded.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 71

New Information Requests: None

Opportunities for Improvement: None

Indicator GL1.3. Demonstrate that current or anticipated climate changes are having or are likely to have an impact on the well-being of communities *and/or* the conservation status of biodiversity in the project zone and surrounding regions.

Findings: Once section GL1.1 is updated, this section may need to be updated. The current La Niña event and the past two years of flooding and erosion damage may require more evidence over a longer timeframe to be indicative of a trend.

Update: The proponent has decided to fulfill GL3 during the validation assessment. All findings associated with this indicator were therefore rescinded.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator GL1.4. Demonstrate that the project activities will assist communities *and/or* biodiversity to adapt to the probable impacts of climate change.

Findings: The proponent should present the management plan cited in the section to demonstrate that the project activities will assist communities *and/or* biodiversity to adapt to the probable impacts of climate change.

Update: The proponent has decided to fulfill GL3 during the validation assessment. All findings associated with this indicator were therefore rescinded.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 72

Opportunities for Improvement: None

3.6.2. GL2 – Exceptional Community Benefits

This Gold Level Exceptional Community Benefits criterion recognizes project approaches that are explicitly pro-poor in terms of targeting benefits to globally poorer communities **and** the poorer, more vulnerable households and individuals within them. In so doing, land-based carbon projects can make a significant contribution to reducing the poverty and enhancing the sustainable livelihoods of these groups. Given that poorer people typically have less access to land and other natural assets, this optional criterion requires innovative approaches that enable poorer households to participate effectively in land-based carbon activities. Furthermore, this

criterion requires that the project will ‘do no harm’ to poorer and more vulnerable members of the communities, by establishing that no member of a poorer or more vulnerable social group will experience a net negative impact on their well-being or rights.

Project proponents must:

Indicator GL2.1. Demonstrate that the project zone is in a low human development country OR in an administrative area of a medium or high human development country in which at least 50% of the population of that area is below the national poverty line.

Findings: The proponent has demonstrated that project zone is in a low impact human development region through citation of reports and studies on the Department of Chocó. According to DANE (2009), 76% of *Chocoanos* had basic unmet needs in 2005.

Update: The proponent has decided to fulfill GL3 during the validation assessment. All findings associated with this indicator were therefore rescinded.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator GL2.2. Demonstrate that at least 50% of households within the lowest category of well-being (e.g., poorest quartile) of the community are likely to benefit substantially from the project.

Findings: What is currently described in this section addresses more of the need for development rather than what the indicator asks for (Demonstrate that at least 50% of households within the lowest category of well-being (e.g., poorest quartile) of the community are likely to benefit substantially from the project). Given the information presented in CL2.1, it is likely that the project benefits at least 50% of the households within the lowest category of well-being. This section should include any additional information that would lend support to the project meeting this indicator.

Update: The proponent has decided to fulfill GL3 during the validation assessment. All findings associated with this indicator were therefore rescinded.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 73

Opportunities for Improvement: None

Indicator GL2.3. Demonstrate that any barriers or risks that might prevent benefits going to poorer households have been identified and addressed in order to increase the probable flow of benefits to poorer households.

Findings: The proponent has not identified and addressed any barriers or risks that might prevent benefits going to poorer households in order to increase the probable flow of benefits to poorer households.

Update: The proponent has decided to fulfill GL3 during the validation assessment. All findings associated with this indicator were therefore rescinded.

Conformance: Yes No N/A

Non-Conformity Reports: NCR 74

New Information Requests: None

Opportunities for Improvement: None

Indicator GL2.4. Demonstrate that measures have been taken to identify any poorer and more vulnerable households and individuals whose well-being or poverty may be negatively affected by the project, and that the project design includes measures to avoid any such impacts. Where negative impacts are unavoidable, demonstrate that they will be effectively mitigated.

Findings: The proponent has identified women as a vulnerable group. Regular meetings are held with community members to discuss issues of distribution of project implementation, benefits, and other issues. The project is designed primarily for collective benefit.

Update: The proponent has decided to fulfill GL3 during the validation assessment. All findings associated with this indicator were therefore rescinded.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 75

Opportunities for Improvement: None

Indicator GL2.5. Demonstrate that community impact monitoring will be able to identify positive and negative impacts on poorer and more vulnerable groups. The social impact monitoring must take a differentiated approach that can identify positive and negative impacts on poorer households and individuals and other disadvantaged groups, including women.

Findings: The proponent does not discuss monitoring in this section and thus cannot yet demonstrate that community impact monitoring will be able to identify positive and negative

impacts on poorer and more vulnerable groups. The social impact monitoring must take a differentiated approach that can identify positive and negative impacts on poorer households and individuals and other disadvantaged groups, including women.

Update: The proponent has decided to fulfill GL3 during the validation assessment. All findings associated with this indicator were therefore rescinded.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: NIR 76

Opportunities for Improvement: None

3.6.3. GL3 – Exceptional Biodiversity Benefits

All projects conforming to the Standards must demonstrate net positive impacts on biodiversity within their project zone. This Gold Level Exceptional Biodiversity Benefits criterion identifies projects that conserve biodiversity at sites of global significance for biodiversity conservation. Sites meeting this optional criterion must be based on the Key Biodiversity Area (KBA) framework of vulnerability and irreplaceability. These criteria are defined in terms of species and population threat levels, since these are the most clearly defined elements of biodiversity. These scientifically based criteria are drawn from existing best practices that have been used, to date, to identify important sites for biodiversity in over 173 countries.

Project proponents must demonstrate that the project zone includes a site of high biodiversity conservation priority by meeting either the vulnerability *or* irreplaceability criteria defined below:

Indicator GL3.1. Vulnerability.

Regular occurrence of a globally threatened species (according to the IUCN Red List) at the site:

- 1.1. Critically Endangered (CR) and Endangered (EN) species - presence of at least a single individual; or
- 1.2. Vulnerable species (VU) - presence of at least 30 individuals or 10 pairs.

Findings: The proponent provides a list of several IUCN globally CR and VU species that occur in the project zone in GL3.1. The background information on the IUCN Red list species found in the project zone is provided in section G1.7 with appropriate reference to field research and peer-reviewed literature.

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Or,

Indicator GL3.1. Irreplaceability.

A minimum proportion of a species' global population present at the site at any stage of the species' lifecycle according to the following thresholds:

- 2.1. Restricted-range species - species with a global range less than 50,000 km² and 5% of global population at the site; or
- 2.2. Species with large but clumped distributions - 5% of the global population at the site; or
- 2.3. Globally significant congregations - 1% of the global population seasonally at the site; or
- 2.4. Globally significant source populations - 1% of the global population at the site.

Findings: N/A

Conformance: Yes No N/A

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

4.0 CCB Validation Conclusion

Following completion of SCS's duly-accredited validation process, it is our opinion that the The Chocó-Darién Conservation Corridor conforms to the CCBA Climate, Community and Biodiversity Project Design Standards (Second Edition) and has achieved the Gold Level for the Biodiversity criterion (Appendix A).

5.0 Corrective Action Requests

Please see section 3.1 of this report for descriptions of the types of corrective action requests. Please see section 3 for references to these corrective action requests.

<h3>SCS FINDINGS FORM</h3> <p>Check one:</p> <p><input checked="" type="checkbox"/> Non-Conformity Report (NCR)</p> <p><input type="checkbox"/> New Information Request (NIR)</p> <p><input type="checkbox"/> Opportunity for Improvement (OFI)</p>

1. Finding Number	2011.69, 08/05/2011	
2. Name of SCS Representative Submitting Form	Kyle Meister	
3. Position of SCS Representative	Certification Forester	
5. Company Audited	Anthroctect	
6. Company Site (City, State)	Acandi, Colombia	
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.	
8. Authorized Company Representative Title		
9. Relevant Area/Department/Function of Company		
10. Due Date of Response by Company	11/3/2011	
11. Document Reference (if applicable): PDD v4, p. 149	12. Standard Reference (If applicable): B3.3	
<p>13. FINDING: <i>(Describe and provide objective evidence)</i> The proponent has not committed to disseminating its biodiversity monitoring plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.</p>		
Acceptance of Finding:		
Individual submitting this Form (Item 2) Signed: _____ Date: 8/5/2011	Authorized Company Representative (Item 7) Signed: _____ Date: _____	

14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

This was not complete at the time of first submission.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

(Describe and provide objective evidence)

Corrective Action:

See revised section B 3.3 on the proponent’s commitment to make public the results of biodiversity monitoring within the communities and to the global public.

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2)

Signed: Kyle Meister Date: December
 16, 2011

Authorized Company Representative (Item 7)

Signed: Date:

SCS FINDINGS FORM

Check one:

- Non-Conformity Report (NCR)**
- New Information Request (NIR)**
- Opportunity for Improvement (OFI)**

1. Finding Number	2011.01, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthroctect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011

11. Document Reference (if applicable): PDD v4, p. 25	12. Standard Reference (If applicable): G.1.3
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13. FINDING:
(Describe and provide objective evidence)
 The CCB requires projects to define a 'project area' and 'project zone.' The 'project area' is defined as the land within the carbon project boundary and under the control of the project proponent. The 'project zone' is defined as the project area and the land within the boundaries of the adjacent communities potentially affected by the project.

The proponent has not provided a description of the boundaries of the 'project area' and the 'project zone.'

Acceptance of Finding:	
Individual submitting this Form (Item 2)	Authorized Company Representative (Item 7)

Signed: Kyle Meister	Date: 8/5/2011	Signed:	Date:
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14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

Information not included distinguishing the project zone from the area.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

(Describe and provide objective evidence)

Corrective Action:

Distinction of the project area (territory of Cocomasur) from the project zone (the municipality of Acandí) including a table of the coordinates and a map distinguishing both project area and zone).

G 1.3 text revision p.24-25

“The project zone is located in northwest Colombia in the municipality of Acandí (Department of Chocó), while the project area is the territory constituting the collective land title of the Tolo River Basin Community Council (COCOMASUR). Table 6 shows the UTM points corresponding to the project area--the property boundaries of the COCOMASUR title, and Figure 4 indicates the area and location of the territory in red. The territory encompasses a total of 13,465 hectares distributed in two non-contiguous blocks, both of which are adjacent to Darién National Park in Panama.”

Go to next page as needed

13. FINDING:

(Describe and provide objective evidence)

On p. 24, the proponent provides a table that shows that the 'project area' is 13,548.49 ha and on p. 53 it states that the collective title of COCOMASUR is 13,465 ha. Please clarify the size of the 'project area.'

Acceptance of Finding:

Individual submitting this Form (Item 2)

Signed: Kyle Meister Date: 8/5/2011

Authorized Company Representative (Item 7)

Signed: Date:

14. ROOT CAUSE ANALYSIS:

The old value was incorrectly calculated using outdated shape files.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

Corrective Action:

See revised PDD, Table 5: 13,465, the area of the collective title, is the actual project area. The total sum at bottom of table 5 was updated to reflect this.

Objective evidence:

Annex:

CA 17: Resolución de Titulo Colectivo

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2)

Signed: Kyle Meister
 November 29, 2011

Date:

Authorized Company Representative (Item 7)

Signed:

Date:

SCS FINDINGS FORM

Check one:



Non-Conformity Report (NCR)

<input type="checkbox"/> New Information Request (NIR) <input type="checkbox"/> Opportunity for Improvement (OFI)	
1. Finding Number	2011.03, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p.p. 26-41	12. Standard Reference (If applicable): G.1.4
13. FINDING: <i>(Describe and provide objective evidence)</i> The proponent does not reference the methodology used for estimating the current carbon stocks within the 'project area. For example, if carbon stocks were estimated using stratification by land-use or vegetation type and methods of carbon calculation (such as biomass plots, formulae, default values) from the Intergovernmental Panel on Climate Change's 2006 Guidelines for National GHG Inventories for Agriculture, Forestry and Other Land Use (IPCC 2006 GL for AFOLU), then these recognized methodologies shall be referenced. If more robust and detailed methodology was used, that shall be referenced. Evidence of non-conformance includes p.29, where a reference to IPCC is proposed, but not included. Overall, no methodology is cited. There are several references included in the description, but it is unclear if these come from a published methodology.	
Acceptance of Finding:	
Individual submitting this Form (Item 2) Signed: _____ Date: 8/5/2011	Authorized Company Representative (Item 7) Signed: _____ Date: _____

14. ROOT CAUSE ANALYSIS: <i>(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)</i> A published methodology was not adhered to for estimating current carbon stocks in the project

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:
(Describe and provide objective evidence)

Corrective Action:

See revised PDD, Section G.1.4: Overview included to reference forest/non forest stratification and literature references for above-ground biomass. Current carbon stocks section added showing standard calculation for total carbon stocks using IPCC default values, literature estimates and conversion factors. The total current carbon stock within the project area across all considered pools is 9.87 million tCO₂e. References to previous inventory estimates have been removed. Current carbon stocks are based on a land use stratification (forest/non-forest), regional literature estimate, IPCC defaults and Tier 1 methods from IPCC GPG.

Comments from SCS:

A published methodology may have been adhered to for calculation of carbon stocks. However, the only reference to the methodology is as follows:
 “...an aboveground biomass estimate of 269.0 MgC/ha from Golley et al. (1969) were used to calculate the carbon stocks.”

The CCB Standards (G1.4, footnote 6) require that:

“In cases where a published methodology is used, the full reference must be given and any variations from the published methodology must be explained.”

It appears that the number from Golley et al. (1969) is a published default value from a book. The CCB Standards do specifically state that default values may be used, so the use of the Golley et al. (1969) number may be OK. However, a reference to an entire book does not constitute a reference to a published methodology. The proponent should provide an exact reference to the section of the book where the number is reported.

With respect to the other values used to compute the carbon stock estimate of 9.87 million Mg CO₂e (see p35 of PDD V8.58), all have been verified to be correctly sourced from the IPCC. The calculation has also been verified to be correct, if the units of the Golley et al. (1969) value are Mg biomass/ha. The calculation on p35 of the PDD is correct only if this value is in Mg biomass/ha, because a conversion factor of 0.47 is applied to convert to Mg C/ha. However, the PDD repeatedly states that the units are Mg C/ha. If this is the case, then the computed value is off quite a bit.

Recommendation:

Clarify whether the units of the Golley et al. (1969) value are Mg C/ha or Mg biomass/ha. Please provide the relevant section of the book be scanned and provided digitally, so that SCS can verify that the number is correct and that the default value is appropriate.

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2)

Signed: Kyle Meister Date: January 27, 2012

Authorized Company Representative (Item 7)

Signed: Date:

(CONTINUED) 15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED

(Describe and provide objective evidence)

3rd review (PDD v8.60): The values from Golley et al (1969) have been converted from kg biomass/ ha for premontane forests of Colombia and Panama. The units in Golley et al.'s paper are in terms of biomass. In the referenced paper, now attached in this smartsheet, one can find the data used in table 2. Estimates are from over and understory stems and roots the forest type indicated in figure 1 of Golley et al.

Response and recommendation:

The value of 269.0 Mg C/ha from Golley *et al.* (1969) comes from premontane forests for aboveground biomass given in kg/ha for overstory leaves and stems (10,576 and 258,434 kg/ ha, respectively; see Table 1 (1969)). These values have been added and converted to Mg by divided by 1,000. First of all, it has not been stated that the biomass estimates were from premontane forests (which I agree these most closely match the Chocó). It is clear that the value comes from leaves and stems of the study Table 10 of the PDD. Second of all, the units for Golley *et al.* (1969) are for dry biomass, not C. This is a moot point, however, since the molecular weights are given in the equation to estimate the total carbon stocks of all included pools, which effectively converts biomass to C. In the first paragraph of G.1.4, it should be 269.0 Mg/ha of biomass.

Recommendation: Correct the units of biomass for Golley *et al.* (1969) and make it clear the value comes from premontane forests for aboveground biomass given in kg/ha for overstory leaves and stems.

Anthrotect response: Text amended as indicated; see G.1.4 1, 2nd sentence. Reference added to bibliography.

SCS FINDINGS FORM	
<p>Check one:</p> <p><input type="checkbox"/> Non-Conformity Report (NCR)</p> <p><input checked="" type="checkbox"/> New Information Request (NIR)</p> <p><input type="checkbox"/> Opportunity for Improvement (OFI)</p>	
1. Finding Number	2011.04, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p.p. 44-51	12. Standard Reference (If applicable): G.1.5
<p>13. FINDING: <i>(Describe and provide objective evidence)</i> Anthrotect describes intergenerational (e.g., p.116) and gender (e.g., p. 139, 152) equity among some of the benefits of the project. The proponent must describe baseline age and gender characteristics for the 'project zone.'</p>	
Acceptance of Finding:	

Individual submitting this Form (Item 2) Signed: _____ Date: 8/5/2011	Authorized Company Representative (Item 7) Signed: _____ Date: _____
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14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

Incomplete information at the time of submission.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

(Describe and provide objective evidence)

Corrective action: Revision of section G 1.5

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2) Signed: Kyle Meister Date: December 15, 2011	Authorized Company Representative (Item 7) Signed: _____ Date: _____
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SCS FINDINGS FORM

Check one:

- Non-Conformity Report (NCR)**
 New Information Request (NIR)
 Opportunity for Improvement (OFI)

1. Finding Number	2011.05, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p. 51, last paragraph	12. Standard Reference (If applicable): G.1.5

13. FINDING:

(Describe and provide objective evidence)

The number of hectares under contract for plantation cultivation should be defined or at least estimated. During the field evaluation, community members discussed areas within the 'project zone' that consist of Teak plantation that were not discussed in the PDD.

Acceptance of Finding:	
Individual submitting this Form (Item 2) Signed: _____ Date: 8/5/2011	Authorized Company Representative (Item 7) Signed: _____ Date: _____

14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

Information not included in the PDD.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

(Describe and provide objective evidence)

Corrective Action: See updated PDD section G 1.5 under the “Forestry” subheading.

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:	
Individual submitting this Form (Item 2) Signed: Kyle Meister Date: December 15, 2011	Authorized Company Representative (Item 7) Signed: _____ Date: _____

SCS FINDINGS FORM

Check one:

- Non-Conformity Report (NCR)**
 New Information Request (NIR)
 Opportunity for Improvement (OFI)

1. Finding Number	2011.06, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthroctect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p.p. 51, 60	12. Standard Reference (If applicable): G.1.5

13. FINDING:

(Describe and provide objective evidence)

Several references throughout the document are either not defined or not included in the final list of references. The pages cited are but a few examples (e.g., INVIAS 1998, Myers 1988, Hafter (1963, 1979, 1982), Table 18, (Los Katios National Park), Rodriguez-Mahecha et al., 2006, IUCO 2010, CITES 2010, Rueda et al, 1992, Medem 1962, etc). Please copyedit the PDD accordingly.

Acceptance of Finding:

Individual submitting this Form (Item 2)	Authorized Company Representative (Item 7)
--	--

Signed:	Date: 8/5/2011	Signed:	Date:
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14. ROOT CAUSE ANALYSIS:
(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)
 Incomplete referencing.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:
(Describe and provide objective evidence)

References in the PDD have been updated since the first document was submitted.

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2)	Authorized Company Representative (Item 7)
Signed: Kyle Meister Date: December 15,	Signed: Date:

2011	
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SCS FINDINGS FORM	
Check one:	
<input type="checkbox"/> Non-Conformity Report (NCR)	
<input checked="" type="checkbox"/> New Information Request (NIR)	
<input type="checkbox"/> Opportunity for Improvement (OFI)	
1. Finding Number	2011.07, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable):	12. Standard Reference (If applicable): G.1.5

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SCS FINDINGS FORM

Check one:

- Non-Conformity Report (NCR)**
- New Information Request (NIR)**
- Opportunity for Improvement (OFI)**

1. Finding Number	2011.08, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable):	12. Standard Reference (If applicable): G.1.6.

13. FINDING:

(Describe and provide objective evidence)

The proponent must describe economic activities (e.g., goods and services) by land use type and communities by ownership or organizational type.

(CONTINUED) 15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION
PROVIDED

(Describe and provide objective evidence)

Corrective Action:

See updated section G 1.6

SCS FINDINGS FORM	
<p>Check one:</p> <p><input type="checkbox"/> Non-Conformity Report (NCR)</p> <p><input checked="" type="checkbox"/> New Information Request (NIR)</p> <p><input type="checkbox"/> Opportunity for Improvement (OFI)</p>	
1. Finding Number	2011.09, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthroctect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p. 52	
12. Standard Reference (If applicable): G.1.6.	
<p>13. FINDING: <i>(Describe and provide objective evidence)</i></p> <p>Mining is cited as a contentious economic activity in the 'project zone' throughout the PDD (e.g., p.p., 46 and 106). If it belongs in the list of threats to tenure and/or property rights on p. 52, it should be added to G 1.6. If not, it should be justified why mining does not threaten customary or legal property rights.</p>	
Acceptance of Finding:	

Individual submitting this Form (Item 2) Signed: _____ Date: 8/5/2011	Authorized Company Representative (Item 7) Signed: _____ Date: _____
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14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

Lack of information on the legal framework for mining in Colombia with respect to collective territories.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

Revision of section G 1.6

The rights to subsoil non-renewable resources including minerals, oil and gas in Colombia belong to the state, while the soil belongs to the landowner (**Annex CA 10**). In the case of COCOMASUR, there is no conflict between soil and subsoil ownership rights and the use of renewable natural resources, including forests and their ecosystem services. In order for the Colombian state to explore or exploit subsoil non-renewable resources, a free prior informed consent process regulated by decree law 1320 would be required to guarantee the rights of the community landowner, and to establish mechanisms of compensation for foreseeable social, economic, cultural or ecologic damages to be incurred from the project. This would include those from lost revenue from the commercialization of environmental services in the case of COCOMASUR. At present there are no permits granted for mining exploitation in the project area (**Annex CA 11**).

Annexes:

CA 10: Concepto Jurídico sobre derechos de subsuelo y carbono

CA 11: Mapa de títulos mineros

Go to next page as needed	
Acceptance of Corrective Action or Preventive Action or New Information:	
Individual submitting this Form (Item 2) Signed: Kyle Meister Date: November 29, 2011	Authorized Company Representative (Item 7) Signed: _____ Date: _____

SCS FINDINGS FORM	
<p>Check one:</p> <input type="checkbox"/> Non-Conformity Report (NCR) <input checked="" type="checkbox"/> New Information Request (NIR) <input type="checkbox"/> Opportunity for Improvement (OFI)	
1. Finding Number	2011.10, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable):	12. Standard Reference (If applicable): G.1.6.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

New Information Provided:

There are currently no concessions within the territory for mining exploration (Annex CA 11). A consultation process would be required if the state were to explore non-renewable subsoil resources within the territory of COCOMASUR (Annex CA 10)

Annexes:

CA 10: Concepto Juridico sobre derechos subsuelo y carbono

CA 11: Map of mining concessions

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2) Signed: Kyle Meister Date: November 29, 2011	Authorized Company Representative (Item 7) Signed: Date:
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SCS FINDINGS FORM

Check one:

- Non-Conformity Report (NCR)
- New Information Request (NIR)
- Opportunity for Improvement (OFI)

1. Finding Number	2011.11, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

New information provided:

Regarding artisanal mining and hunting:

- An HCV community consultation was completed in July. It explored potential conflicts from conservation with other land uses such as artisanal mining, hunting and gathering.
- The assessment determined that there is no hunting and gathering to meet basic needs, rather they are practiced for sport and enjoyment, and to supplement household income (See Annex, “HCV Assessment”).
- Mining activities do not represent a potential dispute or conflict with the conservation goals of the project. Only a handful of families are involved in artisanal mining (4 or 5). The activity itself is low-impact and affects no more than 5 ha of land.
- The activity is only legal with the permission of the Council.
- An illegal mining operation by outside invaders was effectively and peacefully halted by the Council in the past 3 months. Mining by outside groups is more of a threat than an increase in mining by community members. Now that the territory is more organized, these invasions can be more easily caught and handled. The presence of the project should act as a deterrent to potential invaders portending to practice artisanal mining.

Land disputes in the zone: (see attached confidential annex, “Conflicts”) A reference to Annex CA

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2) Signed: Kyle Meister Date: January 11, 2012	Authorized Company Representative (Item 7) Signed: _____ Date: _____
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SCS FINDINGS FORM

Check one:

- Non-Conformity Report (NCR)**
 New Information Request (NIR)
 Opportunity for Improvement (OFI)

1. Finding Number	2011.12, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of	

SCS FINDINGS FORM

Check one:

- Non-Conformity Report (NCR)**
 New Information Request (NIR)
 Opportunity for Improvement (OFI)

1. Finding Number	2011.13, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotest
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p. 55-91	12. Standard Reference (If applicable): G.1.7.

13. FINDING:

(Describe and provide objective evidence)

Threats to species or species groups are poorly described throughout the biodiversity section. The proponent must address threats to native species or species groups in section G.1.7. For example, what kinds of disturbances make avian species vulnerable according to Stattersfield et al (1998) as the proponent states on page 60?

Acceptance of Finding:

Individual submitting this Form (Item 2)	Authorized Company Representative (Item 7)
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Signed:	Date: 8/5/2011	Signed:	Date:
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14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

Biodiversity information in section G 1.7 was in process of being edited at the time of the first PDD submission.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

Corrective Action:

See revised section G 1.7 and G 1.8, both of which address threats to specific species groups.

New Information:

Threats are also addressed in the HCV assessment (Annex CA 22)

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2)	Authorized Company Representative (Item 7)
Signed: Kyle Meister Date: December	Signed: Date:

15, 2011	
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SCS FINDINGS FORM	
<p>Check one:</p> <p><input type="checkbox"/> Non-Conformity Report (NCR)</p> <p><input checked="" type="checkbox"/> New Information Request (NIR)</p> <p><input type="checkbox"/> Opportunity for Improvement (OFI)</p>	
1. Finding Number	2011.14, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p. 59	12. Standard Reference (If applicable): G.1.7

14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

No supporting information was found by biologists working with the proponent to support this claim.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

(Describe and provide objective evidence)

The statement was removed. See the revised section G1.7

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2)

Signed: Kyle Meister

November 29, 2011

Date:

Authorized Company Representative (Item 7)

Signed:

Date:

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SCS FINDINGS FORM

Check one:

- Non-Conformity Report (NCR)**
- New Information Request (NIR)**
- Opportunity for Improvement (OFI)**

1. Finding Number	2011.15, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p. 92	12. Standard Reference (If applicable): G.1.8

13. FINDING:

(Describe and provide objective evidence)

The proponent has not completed an evaluation of whether the 'project zone' includes any of the following High Conservation Values (HCVs) and a description of the qualifying attributes (G.1.8.1 - G.1.8.6; synonymous with HCV1 - HCV6). The classification of the whole 'project area' or 'project zone' as HCV without the completion of the HCV analysis and determination of HCV area by the six recognized types in not in conformance with G 1.8.

Acceptance of Finding:	
Individual submitting this Form (Item 2) Signed: _____ Date: 8/5/2011	Authorized Company Representative (Item 7) Signed: _____ Date: _____

14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

An HCV assessment was not completed at the time of submission.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

(Describe and provide objective evidence)

An HCV assessment was completed identifying the HCVs in the project zone, and the measures for their ongoing maintenance and enhancement.

See revised section G 1.8

New Information Provided:

CA 22: HCV Assessment

CA 28: Darien Species Information

CA 29: Bird Indicator Species

CA 30: HCV monitoring framework

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:	
Individual submitting this Form (Item 2) Signed: Kyle Meister Date: December 15, 2011	Authorized Company Representative (Item 7) Signed: _____ Date: _____

SCS FINDINGS FORM	
<p>Check one:</p> <p><input checked="" type="checkbox"/> Non-Conformity Report (NCR)</p> <p><input type="checkbox"/> New Information Request (NIR)</p> <p><input type="checkbox"/> Opportunity for Improvement (OFI)</p>	
1. Finding Number	2011.16, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p.p. 93, 95-96	12. Standard Reference (If applicable): G.2.1

14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

A published methodology was not adhered to for determining the most likely land use scenario in the absence of the project.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

Corrective Action:

See revised PDD, Sections G.2.1 and G.2.3.

The selected baseline scenario is presented along with a range of potential baseline scenarios. In addition to projection by the Dinamica model, projections from VCS-approved VM0009 are also presented.

Projections of deforestation by these models are similar. Estimated carbon stock changes are presented in section G.2.3 based on the VM0009 and current carbon stocks presented in section G.1.4.

The most likely land use scenario is described using a combination of Dinamica and VCS-approved VM0009. A range of potential land use scenarios and the associated drivers are described.

We fit observed deforestation values to a logistic function.

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2)

Signed: Kyle Meister
 November 29, 2011

Date:

Authorized Company Representative (Item 7)

Signed:

Date:

SCS FINDINGS FORM

Check one:

- Non-Conformity Report (NCR)**
- New Information Request (NIR)**
- Opportunity for Improvement (OFI)**

1. Finding Number	2011.17, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthroctect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable):	12. Standard Reference (If applicable): G.2.1

13. FINDING:

(Describe and provide objective evidence)

The Project Area includes two areas totaling 1,000 ha that already have been designated for timber harvest. The selected REDD methodology does not permit timber harvesting in the project area. Should this area remain in the project, please include a separate methodology to account for this area. If no harvesting occurs, the proponent may model these areas with its current methodology.

Furthermore, under the baseline scenario these areas designated for timber harvest would require infrastructure to access, which would likely have other effects on the land use scenario in the baseline. The proponent must provide information as to whether or not its baseline model takes these timber harvest areas and associated infrastructure (and any effects of timber harvest/infrastructure on land use) into account.

Acceptance of Finding:

Individual submitting this Form (Item 2)	Authorized Company Representative (Item 7)
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Signed:	Date: 8/5/2011	Signed:	Date:
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14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

Information on the status of COCOMASUR's timber harvest permit was not provided.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

(Describe and provide objective evidence)

New Information Provided:

In 2007, COCOMASUR undertook a forest inventory and was granted a permit to harvest timber in 1,000 hectares of its territory by CODECHOCO. This logging, however, has not commenced since COCOMASUR has decided to pursue livelihoods based on payments for ecosystem services rather than harvest timber. Timber harvesting in the territory is prohibited in the project area and no harvesting is planned. As such, methodology VM0009 is appropriate for this project.

Corrective Action: See revised section G 2.1

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2)	Authorized Company Representative (Item 7)
Signed: Kyle Meister	Signed:
Date:	Date:

December 15, 2011	
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SCS FINDINGS FORM	
<p>Check one:</p> <p><input checked="" type="checkbox"/> Non-Conformity Report (NCR)</p> <p><input type="checkbox"/> New Information Request (NIR)</p> <p><input type="checkbox"/> Opportunity for Improvement (OFI)</p>	
1. Finding Number	2011.18, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p. 97	12. Standard Reference (If applicable): G.2.2

14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

The project proponents did not provide a comprehensive justification of the additionality of project benefits according to a recognized and/or credible methodology.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

(Describe and provide objective evidence)

The project has conducted a preliminary assessment using the VCS Tool for the Demonstration and Assessment of Additionality ([VM0001](#)), and Section G.2.2 of the PDD has been updated accordingly.

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2)

Signed: Kyle Meister Date: December 15, 2011

Authorized Company Representative (Item 7)

Signed: Date:

SCS FINDINGS FORM

Check one:

- Non-Conformity Report (NCR)**
 New Information Request (NIR)
 Opportunity for Improvement (OFI)

1. Finding Number	2011.19, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthroctect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable):	12. Standard Reference (If applicable): G.2.2.

13. FINDING:

(Describe and provide objective evidence)

Most municipalities have local plans for development. The proponent must investigate any such plan for the project zone. If such plans exist, any conflicts between the project area/zone and local plans for development and land use planning (ordenamiento) must be identified and the baseline may need to be modified based on any discoveries. For example, if the municipality classifies the project area for some kind of development in its land use plans, this must be considered in the baseline.

Acceptance of Finding:

Individual submitting this Form (Item 2)	Authorized Company Representative (Item 7)
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Signed:	Date: 8/5/2011	Signed:	Date:
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14. ROOT CAUSE ANALYSIS:
(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

Information was not provided about existing municipal development plans at the time of the audit.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:
(Describe and provide objective evidence)

New Information:

The municipal development plans for Acandí do not currently include collective territories, and therefore there is no conflict in land use planning. COCOMASUR may, however, solicit the municipality of Acandí, to recognize its territorial development plan when it is completed, thereby increasing coherence in land use planning and optimizing resource use.

Two municipal planning documents (EOT and PDM) are annexed as objective evidence.

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:	
Individual submitting this Form (Item 2)	Authorized Company Representative (Item 7)

Signed: Kyle Meister November 29, 2011	Date:	Signed:	Date:
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SCS FINDINGS FORM	
Check one:	
<input checked="" type="checkbox"/> Non-Conformity Report (NCR)	
<input type="checkbox"/> New Information Request (NIR)	
<input type="checkbox"/> Opportunity for Improvement (OFI)	
1. Finding Number	2011.20, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthroctect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p. 97	12. Standard Reference (If applicable): G.2.3
13. FINDING: <i>(Describe and provide objective evidence)</i> The proponent has not presented its calculations of the estimated carbon stock changes associated with the 'without project' reference scenario described in G.2.1.	
Acceptance of Finding:	
Individual submitting this Form (Item 2) Signed: _____ Date: 8/5/2011	Authorized Company Representative (Item 7) Signed: _____ Date: _____

14. ROOT CAUSE ANALYSIS: <i>(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)</i> The table of carbon stock change estimations was not included in the first draft submitted.
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15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

(Describe and provide objective evidence)

New Information Provided:

Calculations of the estimated carbon stock changes are presented in section G.2.3 of the PDD. Estimated carbon stock changes in tCO₂e are derived from VM0009 while estimates of land use change (in hectares) are derived from the Dinamica model.

Comments from SCS:

The CCB Standards (G2.3) require that the proponent:

“Calculate the estimated carbon stock changes associated with the ‘without project’ reference scenario described above... Projects whose activities are designed to avoid GHG emissions (such as those reducing emissions from deforestation and forest degradation (REDD), avoiding conversion of non-forest land, or certain improved forest management projects) must include an analysis of the relevant drivers and rates of deforestation and/or degradation and a description and justification of the approaches, assumptions and data used to perform this analysis.”

The VM0009 methodology appears to have been used to perform this task. The procedure used to determine the total cumulative deforestation percentage of 48% is reasonably well described. However, the assumptions regarding carbon stock change in deforested areas are not well defined. The PDD states that “Conversion of natural ecosystems to pasture and grazing land in the without project scenario is based on published values and IPCC defaults (see G.1.4).” This is not adequate to fulfill the requirement of the CCB Standards that “a description and justification of the approaches, assumptions and data used to perform this analysis” must be provided.

The finding can be closed when all approaches, assumptions and data used to forecast carbon stock changes in the baseline scenario are described and justified within the PDD.

Update from Anthrotect: Soil loss is slow in the beginning because of the exponential decay model. As the project area is deforested in the baseline scenario, the exponential soil decay compounds linearly in time. For AG and BG tree biomass Anthrotect selected a conservative linear rate below that predicted by the logistic function, per VM0009. See text to this effect in G.2.3. See additional text in PDD, G2.3. Assumptions and approaches to the model are now described in the G.2.3, including expected changes in land use under the baseline scenario. Data used to estimate carbon stock changes associated with the “without---project” reference scenario are from image point interpretation of the reference area over a historic reference period. Per VM0009, these data are used to parameterize the Cumulative Deforestation Model. Figures 20---27 show the results of the image interpretation of the 2202 points on a grid over the reference area.

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2)

Signed: Kyle Meister Date: January 23, 2012

Authorized Company Representative (Item 7)

Signed: _____ Date: _____

SCS FINDINGS FORM

Check one:

- Non-Conformity Report (NCR)**
 New Information Request (NIR)
 Opportunity for Improvement (OFI)

1. Finding Number	2011.21, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthroctect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable):	12. Standard Reference (If applicable): G.2.3

13. FINDING:

(Describe and provide objective evidence)

The forest inventory did not include measurements of palms and non-commercial trees. In addition, some large tree diameters were either estimated ocularly or not at all in inventory according to the community. These palms and trees must be included in estimations of baseline carbon stocks in accordance with the selected methodology for estimating carbon stocks prior to the start of the project.

Acceptance of Finding:

Individual submitting this Form (Item 2)	Authorized Company Representative (Item 7)
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Signed:	Date: 8/5/2011	Signed:	Date:
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14. ROOT CAUSE ANALYSIS:
(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)
 The previous estimation of carbon stocks included biomass associated with commercial species, excluding palms and other non-commercial species.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:
CORRECTIVE ACTION:
 See revised PDD, section G.1.4.
 Forest inventory is not being used to estimate carbon stocks prior to the start of the project. Instead a published values and IPCC defaults are being used, which include palms and aboveground non-commercial biomass for included pools. Estimated carbon stocks are included in the PDD and definitions of the carbon pools are included in the PDD.
 Carbons stock changes are estimated for the project crediting period.
 A justification for the exclusion of Non-CO2 emissions is provided in the PDD.

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:	
Individual submitting this Form (Item 2)	Authorized Company Representative (Item 7)

Signed: Kyle Meister November 29, 2011	Date:	Signed:	Date:
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SCS FINDINGS FORM	
<p>Check one:</p> <p><input type="checkbox"/> Non-Conformity Report (NCR)</p> <p><input checked="" type="checkbox"/> New Information Request (NIR)</p> <p><input type="checkbox"/> Opportunity for Improvement (OFI)</p>	
1. Finding Number	2011.22, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p. 98	12. Standard Reference (If applicable): G.2.4

14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

The current food system and its implications for the reference scenario are not included.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

Corrective Action: Text revision section G2.4

Low income and involvement in productive activities

The local economy is based on subsistence agriculture, artisanal fishing and a limited amount of commerce and small business concentrated in the more touristic areas along the coast and the center of Acandí town, several hours in some cases from the communities of COCOMASUR. After years of abandonment, people who fled during the violent years of the past decade are returning to their land parcels to farm. Agricultural and fisheries production is still at low volumes and is affected by seasonal rains and winds, overfishing by commercial fishermen, a lack of transportation infrastructure, cold chain and post-harvest storage (Marín Marín 2004: 60). Monetary income levels and purchasing power are very low, and often are contingent on irregular and unpredictable opportunities, such as logging or wage labor on a local cattle ranches, although this is limited to a handful of young men. Ranching in the area is of the extensive variety, characterized by large areas of pasture and low numbers of cattle, but does not create much local employment for members of COCOMASUR. Credit access is limited and on unfavorable terms, often through local lenders charging up to 40% interest.

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2)

Signed: Kyle Meister
 November 29, 2011

Date:

Authorized Company Representative (Item 7)

Signed:

Date:

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(CONTINUED) 15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED

In the absence of the project, selective logging would continue. Loggers sell timber boards to middlemen at a very low price, and using logging practices that are dangerous and do not optimize forest management and enhancement—a short term return with a long-term impact. Opportunities for alternative income-generating activities or employment would be stagnant, causing out-migration to more urbanized areas. Opportunities and incomes levels would not increase among the general population or among vulnerable and marginalized groups (i.e., women). .. Access employment, education, health services and micro finance are not likely to increase significantly without a significant project to invest in these areas. The historic absence of government, and lack of investment by third sector or private entities are reasons why this region remains isolated and underdeveloped.

Access to employment, education, health services and micro finance are not likely to increase significantly without a significant project to invest in these areas. The historic absence of government, and lack of investment by third sector or private entities are reasons why this region remains isolated and underdeveloped.

Food system

Despite the common assumption of ‘tropical abundance,’ the region is nevertheless subject to limitations and periods of scarcity. The population depends on products imported from other regions to supplement what they produce from subsistence agricultural and fishing. The production of food in the area is not sufficient to achieve food security in the region nor to export. The low levels of purchasing power require alternative strategies to face scarcity such as exchanges, loans, and purchases in very small quantities.

Research on Acandí musicality shows that food security is compromised due to poor access and narrow variety of locally available foods within each food group, the limited volume, variety of locally produced foodstuffs, and a lack of disposable income to purchase the costly food imported from the interior. Harvests are seasonal and local production of rice, corn, yucca, ñame, coconut and borojó is not sufficient to meet local needs.

Overfishing by commercial fishery operations in the regions has had destructive impacts on the marine ecosystem and in the stocks of species once found in much greater abundance (Marín Marín 2004). The river systems in the project area have accumulated silt decreasing their provision of fish. Most fishing occurs along the coast, though artisanal fishing is disadvantaged when compared to commercial boats who operate in deeper waters with capacities for industrial catches.

The diet in the project area is monotonous and deficient in nutrients. Except for sugars and fats, all other food groups are consumed at levels well below national nutritional guidelines (Marín Marín 2004). The capacity of households to cover their basic needs is affected by poor access to credit, agricultural inputs, and the decline in agriculture due to violence during the last decade. The dependence on goods brought from other regions that are more costly and the lack of productive opportunities and monetary income compromises the capacity of households to cover their basic nutritional needs, and this in turn, compromises the capacity of future generations (Marín Marín, 2004).

In the absence of the project, agricultural practices would continue at subsistence levels without adequate inputs and investments in improving techniques and access to markets. The lack of diversity in food production would continue as soil fertility declined from shifting cultivation, cattle ranching and forest degradation that impacts the hydrological services and productivity of areas used for agriculture and fishing.

SCS FINDINGS FORM	
<p>Check one:</p> <p><input checked="" type="checkbox"/> Non-Conformity Report (NCR)</p> <p><input type="checkbox"/> New Information Request (NIR)</p> <p><input type="checkbox"/> Opportunity for Improvement (OFI)</p>	
1. Finding Number	2011.23, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p.p. 101-103	12. Standard Reference (If applicable): G.3.2

14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

Map not included at the time of submission.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

(Describe and provide objective evidence)

New Information provided:

Leakage and project area map included in section G 3.3.

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2)

Signed: Kyle Meister Date: December 15, 2011

Authorized Company Representative (Item 7)

Signed: _____ Date: _____

SCS FINDINGS FORM

Check one:

- Non-Conformity Report (NCR)**
- New Information Request (NIR)**
- Opportunity for Improvement (OFI)**

1. Finding Number	2011.25, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthroctect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011

11. Document Reference (if applicable): PDD v4, p.p. 103-104	12. Standard Reference (If applicable): G.3.4
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13. FINDING:
(Describe and provide objective evidence)
 The proponent has not defined the GHG accounting period, along with an explanation and justification for any differences the project lifetime and the GHG accounting period.

Acceptance of Finding:	
Individual submitting this Form (Item 2)	Authorized Company Representative (Item 7)

Signed:	Date: 8/5/2011	Signed:	Date:
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14. ROOT CAUSE ANALYSIS:
(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)
 Omission of information in the original document.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:
(Describe and provide objective evidence)

See updated PDD section G 3.4

Annex CA 26: Ex-ante credit generation

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2) Signed: Kyle Meister Date: December 19, 2011	Authorized Company Representative (Item 7) Signed: Date:
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SCS FINDINGS FORM

Check one:

- Non-Conformity Report (NCR)**
 New Information Request (NIR)
 Opportunity for Improvement (OFI)

1. Finding Number	2011.26, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p. 105	12. Standard Reference (If applicable): G.3.5

13. FINDING:

(Describe and provide objective evidence)

The proponent must elaborate on what it is about 'community capacity' that makes it a risk. The way that it is currently described is unclear.

Acceptance of Finding:	
Individual submitting this Form (Item 2) Signed: _____ Date: 8/5/2011	Authorized Company Representative (Item 7) Signed: _____ Date: _____

14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

Unclear description of community capacity challenges.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

(Describe and provide objective evidence)

Corrective Action: text revision in G 3.5 to clarify community capacity risk as “community financial risk”

“COCOMASUR has not had the opportunity to manage a project of this size in the past. As such, the project will focus on building the administrative and financial management capacity of project management staff to reduce the financial risk of the organization in partnership with the Fund for Environmental Action. Risks will be continually assessed and appropriate controls put in place to mitigate them.”

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:	
Individual submitting this Form (Item 2) Signed: Kyle Meister Date: December 15, 2011	Authorized Company Representative (Item 7) Signed: _____ Date: _____

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SCS FINDINGS FORM

Check one:

- Non-Conformity Report (NCR)**
- New Information Request (NIR)**
- Opportunity for Improvement (OFI)**

1. Finding Number	2011.27, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p.p. 104-107	12. Standard Reference (If applicable): G.3.5

13. FINDING:

(Describe and provide objective evidence)

Mitigation measures have not been outlined for earthquakes, viability of REDD offsets, and opportunity costs of REDD and high discount rates.

Acceptance of Finding:	
Individual submitting this Form (Item 2) Signed: _____ Date: 8/5/2011	Authorized Company Representative (Item 7) Signed: _____ Date: _____

14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

The proponent did not include mitigation measures for earthquakes, viability of REDD offsets, and opportunity costs of REDD.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

(Describe and provide objective evidence)

Section G3.5 of the PDD has been updated to include mitigation measures for earthquakes, viability of REDD offsets, and opportunity costs of REDD. These revisions include results from individual time preference exercises carried out in the project zone to assess individual discount rates and their potential impact on conservation (Ferguson 2010).

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

Text mistakenly uses two terms for the same activity.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

(Describe and provide objective evidence)

Corrective action:

Moved to G 1.5 livelihoods section.

The text now uses only one term, “artisanal mining.” Clarification in the characterization of the activity itself as not a threat to the project.

Go to next page as needed

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2)

Signed: Kyle Meister Date: December
 15, 2011

Authorized Company Representative (Item 7)

Signed: Date:

SCS FINDINGS FORM

Check one:

- Non-Conformity Report (NCR)**
- New Information Request (NIR)**
- Opportunity for Improvement (OFI)**

1. Finding Number	2011.29, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotest
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011

11. Document Reference (if applicable): PDD v4, p.p. 107-109	12. Standard Reference (If applicable): G.3.6
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13. FINDING:

(Describe and provide objective evidence)

As a HCV assessment has not been carried out (see G.1.8), the proponent is unable to demonstrate that the project design includes specific measures to ensure the maintenance or enhancement of the high conservation value attributes consistent with the precautionary principle.

Acceptance of Finding:

Individual submitting this Form (Item 2)	Authorized Company Representative (Item 7)
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2011	
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SCS FINDINGS FORM	
Check one:	
<input checked="" type="checkbox"/> Non-Conformity Report (NCR)	
<input type="checkbox"/> New Information Request (NIR)	
<input type="checkbox"/> Opportunity for Improvement (OFI)	
1. Finding Number	2011.30, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthrotect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p. 109	12. Standard Reference (If applicable): G.3.7

SCS FINDINGS FORM	
<p>Check one:</p> <p><input checked="" type="checkbox"/> Non-Conformity Report (NCR)</p> <p><input type="checkbox"/> New Information Request (NIR)</p> <p><input type="checkbox"/> Opportunity for Improvement (OFI)</p>	
1. Finding Number	2011.31, 08/05/2011
2. Name of SCS Representative Submitting Form	Kyle Meister
3. Position of SCS Representative	Certification Forester
5. Company Audited	Anthroctect
6. Company Site (City, State)	Acandi, Colombia
7. Authorized Company Representative Name	Brodie Ferguson, Ph.D.
8. Authorized Company Representative Title	
9. Relevant Area/Department/Function of Company	
10. Due Date of Response by Company	11/3/2011
11. Document Reference (if applicable): PDD v4, p.p. 109-111	
12. Standard Reference (If applicable): G.3.8	
<p>13. FINDING: <i>(Describe and provide objective evidence)</i></p> <p>The proponent has not documented and defended how communities and other stakeholders potentially affected by the project activities have been identified and have been involved in project design activities related to maintaining high conservation values (HCVs). The proponent has not indicated if and how the project proposal was revised based on input from stakeholder consultation. Socialization of the PDD began recently and the project was designed through stakeholder input from COCOMASUR member communities, but not necessarily external stakeholders. Although external consultation remains difficult due to past conflicts, the project must demonstrate that steps have been taken to reach out to all stakeholder and continue consultation throughout the project lifetime. The proponent must explain how internal and external stakeholders have been identified and how any input from stakeholders was taken into account during the characterization of baselines (e.g., land use, HCVs, etc).</p>	
Acceptance of Finding:	
Individual submitting this Form (Item 2)	Authorized Company Representative (Item 7)

Signed:	Date: 8/5/2011	Signed:	Date:
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14. ROOT CAUSE ANALYSIS:

(Describe the most basic reason or cause which, if eliminated or corrected, would prevent the issue from occurring)

HCV consultation was not complete at the time of the validation visit. A meeting with external stakeholders was held just prior to this visit and documentation was not available at the time. Furthermore, the action planning workshop was not held until early August, when the plan for continued consultation and communication with external stakeholders was developed and approved.

15. CORRECTIVE ACTION OR PREVENTIVE ACTION OR NEW INFORMATION PROVIDED:

See revised section G 3.8 in the PDD;

New Information Provided:

A community HCV consultation was conducted in June and July with forest dependent communities in the territory in a two-stage process. First the most forest dependent communities were identified along based on field observation of the relevant HCVs present or possibly present in the project area. After the results of the field observation study, the communities and HCVs that were indicated were involved in formal HCV consultation activities in July by the project coordinator using the ProForest toolkit for methodological guidance. The results of the HCV assessment were incorporated into the design (**Annex, CA 22_ HCVF Assessment**).

A socialization meeting for municipal institutions was held in early June in Acaandí to disseminate and seek comments on the draft PDD. No comments were formally submitted at this meeting which required modification to the PDD. (**Annex CA 20: Memoria_reunion instituciones**) A full audio recording of the meeting is also available upon request.

Further input from stakeholders into design occurred at the action planning workshop in August. This included a component on stakeholder analysis and resulted in a plan to continue communication and consultation between the project managers and the community groups affected by the project, as well as with external stakeholders (neighbors) in the interest of ensuring positive and no negative impacts. (**Annex CA 18 stakeholder identification exercise; Go to next page as needed**)

Acceptance of Corrective Action or Preventive Action or New Information:

Individual submitting this Form (Item 2) Signed: Kyle Meister Date: November 29, 2011	Authorized Company Representative (Item 7) Signed: Date:
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General Section

Conformance

G1. Original Conditions in the Project Area (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
G2. Baseline Projections (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
G3. Project Design and Goals (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
G4. Management Capacity and Best Practices (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
G5. Legal Status and Property Rights (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Climate Section

CL1. Net Positive Climate Impacts (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
CL2. Offsite Climate Impacts (“Leakage”) (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
CL3. Climate Impact Monitoring (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Community Section

CM1. Net Positive Community Impacts (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
CM2. Offsite Community Impacts (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
CM3. Community Impact Monitoring (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Biodiversity Section

B1. Net Positive Biodiversity Impacts (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
B2. Offsite Biodiversity Impacts (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
B3. Biodiversity Impact Monitoring (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Gold Section

GL1. Climate Change Adaptation Benefits (Optional)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
GL2. Exceptional Community Benefits (Optional)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
GL3. Exceptional Biodiversity Benefits (Optional)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

CCBA Validation Level Attained:

APPROVED (all requirements met)	<input checked="" type="checkbox"/>
GOLD (all requirements and also at least one optional Gold Level criterion met)	<input checked="" type="checkbox"/>

None received.