

# CLIMATE COMMUNITY AND BIODIVERSITY STANDARDS

## PROJECT VERIFICATION REPORT

<b>Offset Project Name:</b>	Marais des Cygnes Restoration Initiative
<b>Project Proponent</b>	The Conservation Fund
<b>Verification Body:</b>	SCS Global Services (SCS)
<b>Date of Issue:</b>	9 May 2014
<b>Version Number:</b>	1-0
<b>Reporting Period:</b>	January 2008 – January 2014
<b>Verification Body Contact Information:</b>	2000 Powell Street, Suite 600, Emeryville, CA 94608, USA <a href="http://www.scsglobalservices.com">http://www.scsglobalservices.com</a> Email: <a href="mailto:CPollet-Young@scsglobalservices.com">CPollet-Young@scsglobalservices.com</a> Telephone: +1 (510) 452-8000

# Table of Contents

1.0	Executive Summary.....	1
1.1.	Objective .....	1
1.2.	Scope and Criteria.....	1
1.3.	Level of Assurance.....	1
1.4.	Summary Description of the Project.....	1
1.5.	Audit Process .....	1
1.6.	CCBA Standards.....	2
1.7.	Auditor Qualifications .....	2
1.8.	Stakeholder Comments .....	3
2.0	Review of CCB Requirements.....	3
2.1.	General Section.....	3
2.1.1.	G1 – Original Conditions at Project Site .....	3
2.1.2.	G2 – Baseline Projections .....	5
2.1.3.	G3 – Project Design and Goals .....	6
2.1.4.	G4 – Management Capacity .....	8
2.1.5.	G5 - Land Tenure .....	9
2.1.6.	G6 - Legal Status .....	9
2.1.7.	G7 - Adaptive Management for Sustainability .....	10
2.1.8.	G8 - Knowledge Dissemination.....	11
2.2.	Climate Section .....	12
2.2.1.	CL1 – Net Positive Climate Impacts.....	12
2.2.2.	CL2 – Offsite Climate Impacts (‘Leakage’) .....	13
2.2.3.	CL3 – Climate Impact Monitoring.....	14
2.2.4.	CL4 - Adapting to Climate Change and Climate Variability .....	15
2.2.5.	CL5 - Carbon Benefits Withheld from Regulatory Markets.....	16
2.3.	Community Section.....	16
2.3.1.	CM1 – Net Positive Community Impacts.....	16
2.3.2.	CM2 – Offsite Community Impacts .....	18
2.3.3.	CM3 – Community Impact Monitoring.....	19
2.3.4.	CM4 - Capacity Building.....	19
2.3.5.	CM5 - Best Practices in Community Involvement .....	20
2.4.	Biodiversity Section.....	22
2.4.1.	B1 – Net Positive Biodiversity Impacts .....	22
2.4.2.	B2 – Offsite Biodiversity Impacts.....	23
2.4.3.	B3 – Biodiversity Impact Monitoring.....	24
2.4.4.	B4 - Native Species Use .....	25
2.4.5.	B5 - Water and Soil Resource Enhancement.....	25
3.0	CCB Verification Conclusion .....	26
4.0	Verification Findings.....	26
Appendix A	CCBA Compliance Checklist	
Appendix B	Stakeholder Comments	

## **1.0 Executive Summary**

This report presents the findings of an audit conducted by SCS Global Services (SCS), to confirm the claim made by The Conservation Fund that the Marais des Cygnes National Wildlife Refuge Project conforms to the Climate, Community and Biodiversity Project Design Standards (First Edition). SCS has been accredited by the Climate, Community & Biodiversity Alliance (CCBA) to perform such verification audits.

### **1.1. Objective**

The verification audit is an independent assessment by SCS of the proposed Project activity against the assessment criteria. Verification has resulted in a conclusion by SCS as to whether the Project activities have been implemented in conformance with the assessment criteria and whether the Project should be approved under the CCB Standards.

### **1.2. Scope and Criteria**

The scope of the audit consisted of the Project, its activities, and its geographic extent, as described within the Project Design Document (PDD). The assessment was conducted against the criteria set out within the following guidance documents:

- Climate, Community and Biodiversity Project Design Standards, First Edition (“CCB Standards”)
- Rules for the use of the Climate, Community & Biodiversity Standards, Version 3, 12 December 2013 (“CCB Standards Rules”)

The Project was assessed against all required criteria of the CCB Standards in order to determine whether the Project could be verified at the “Approved” level. In addition, the Project was assessed against eight optional “point scoring” criteria, as set out by the CCB Standards, in order to determine whether the Project could be verified at the “Silver” or “Gold” level.

### **1.3. Level of Assurance**

SCS performed this assessment based on the guidance described by the Rules for the Use of the CCB Standards to determine whether there is a reasonable level of assurance that the Project implementation addresses each requirement of the CCB Standards.

### **1.4. Summary Description of the Project**

The Marais des Cygnes National Wildlife Refuge Project is a reforestation project designed to enhance the long term climate, community, and biodiversity benefits associated with restoring a bottomland hardwood ecosystem

### **1.5. Audit Process**

The audit process included the following steps:

- Initial client meeting (kick-off call) 13 January 2014

- Review of project documentation
- Review of stakeholder comments (if applicable)
- Issuance of findings resulting from desk review (if applicable)
- Site visit 12-13 March 2014
  - Project Overview provided by TCF and USFWS
  - Review of evidence satisfying the verification criteria
  - Visit random portions of the project to review project implementation
  - Interviews with community members
- Issuance of findings resulting from site visit (if applicable)
- Preparation of draft verification report
- Technical review and approval of draft verification report
- Submission of verification report and statement to the CCBA

**Table 1. Interviews Conducted During the Site Visit**

Participant	Affiliation
Carrie Gombos	The Conservation Fund
Jordan Golinkoff	The Conservation Fund
Patrick Martin	U.S. Fish and Wildlife Service
Tim Menard	U.S. Fish and Wildlife Service
Amy Coffman	U.S. Fish and Wildlife Service
Steve Goodwin	Local Community Member
Charlie Titus	Local Community Member

## 1.6. CCBA Standards

SCS conducted its evaluation to verify claims that the Project conforms to the CCBA Climate, Community and Biodiversity Project Design Standards (First Edition) (“the CCB Standards”). The CCB Standards require conformance to 15 criteria in each of 4 categories: 1) General (6 criteria), 2) Climate (3 criteria), 3) Community (3 criteria), and 4) Biodiversity (3 criteria). In addition, applicants can achieve a higher level of validation (Silver or Gold) through the application of eight optional “point scoring” criteria. Silver level validation can be achieved by projects that conform to at least one of the “point scoring” criteria in three of the four sections. Gold level validation can be achieved by projects that conform to at least one of the “point scoring” criteria in each of the four sections and total at least 6 points.

## 1.7. Auditor Qualifications

Mr. Eaton holds a Masters of Forest Science from the Yale School of Forestry and Environmental Studies and received his B.S. in Forestry from Northern Arizona University. The focus throughout his studies was forest management with emphases on sampling design and statistical analysis. He spent three years working collecting field data and completing data analysis on forest restoration projects with the Ecological Restoration Institute. His work experience also includes complete biophysical inventories and

estimation of timber volume for two 3000 acre properties, as a forest consultant in northern New Mexico. During his time in New Mexico, Mr. Eaton worked with local communities to develop collaborative relationships aimed at reducing fire risk across the region. Mr. Eaton currently works as a Verification Forester for SCS and has completed forest carbon projects under the Verified Carbon Standard (VCS), the Climate Action Reserve (CAR), and the Climate, Community, and Biodiversity Alliance (CCBA). Moreover, Mr. Eaton is accredited by the California Air Resources Board as Lead Offset Verifier and is also certified by the Board in the US Forest Project and Urban Forest Protocols. He is also certified as Lead Verifier under the Climate Action Reserve.

In addition, Mr. Eaton has a history of working with community members during his many years spent in the service industry in this region of the country.

## **1.8. Stakeholder Comments**

The Project Design Document (PDD)/Project Implementation Report (PIR) were posted on the CCBA website on 31 January 2014 and the public comment period extended through 2 March 2014. No comments were received during the public comment period.

## **2.0 Review of CCB Requirements**

This assessment report 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. When assessing the conformance of each indicator to the CCB Standards, SCS may issue findings to the Project Proponent. These findings can include Non-Conformity Reports (NCRs), Opportunities for Improvement (OFIs) and New Information Requests (NIRs), compiled in Section 4. In the case of non-conformance, a Non-Conformity Report stipulates the deficiency and its relation to the CCB protocol. NCRs indicate non-conformance at the criterion level that must be satisfied prior to Project validation. An Opportunity for Improvement is often an indication of something that may become a non-conformity if not given proper attention. OFI's are considered by the audit team to be closed upon issuance, and a response to this type of finding is not necessary. New Information Request indicates when additional information is necessary to complete the assessment.

### **2.1. General Section**

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

#### **2.1.1. G1 – Original Conditions at Project Site**

The original conditions at the project site before the project commences must be described. This description, along with projections (G2), will help determine the likely impacts of the project.

<b>G1.1</b> - The location of the project and basic physical parameters (e.g., soil, geology, climate).	This indicator was assessed during validation and remains unchanged throughout the life of the project.
Conformance Y	

<b>G1.2</b> - The types and condition of vegetation at the project site.	This indicator was assessed during validation and remains unchanged throughout the life of the project.
Conformance Y	

<b>G1.3</b> - Current carbon stocks at the project site(s), using methodologies from the Intergovernmental Panel on Climate Change's Good Practice Guidance (IPCC GPG) or other internationally approved methodologies (e.g., from the CDM Executive Board).	This indicator was assessed during validation and remains unchanged throughout the life of the project.
Conformance Y	

<b>G1.4</b> - A description of communities located in and around the project area, including basic socioeconomic information (using appropriate methodologies such as the livelihoods framework).	This indicator was assessed during validation and remains unchanged throughout the life of the project.
Conformance Y	

<b>G1.5</b> - A description of current land use and land tenure at the project site. (See also G5).	This indicator was assessed during validation and remains unchanged throughout the life of the project.
Conformance Y	

<b>G1.6</b> - A description of current biodiversity in the project area and threats to that biodiversity, using appropriate methodologies (e.g., key species habitat analysis, connectivity analysis), substantiated where possible with appropriate reference material.	This indicator was assessed during validation and remains unchanged throughout the life of the project.
Conformance Y	

<p><b>G1.7</b> - A list of all IUCN Red List threatened species (which encompasses endangered and vulnerable species) and species on nationally recognized list (where applicable) found within the project boundary. (See also B1).</p>	<p>This indicator was assessed during validation and remains unchanged throughout the life of the project.</p>
<p>Conformance Y</p>	

### 2.1.2. G2 – Baseline Projections

An analysis of projected land-use trends is necessary to predict likely on-site changes without implementation of a project. This “without-project” future land-use scenario enables comparison of the project’s likely impacts with what would otherwise have occurred.

The project proponents must develop a defensible and well-documented "without-project" future land-use scenario and baseline projections, including the following information:

<p><b>G2.1</b> - Description of the most likely land-use scenario in the absence of the project, identifying whether the scenario assumes that existing laws or regulations would have required that project activities be undertaken anyway.</p>	<p>This indicator was assessed during validation and remains unchanged throughout the life of the project.</p>
<p>Conformance Y</p>	

<p><b>G2.2</b> - A projection of future carbon stock changes in the absence of the project, based on the land-use scenario described above. The timeframe for this analysis can be either the project lifetime (see G3) or the project accounting period, whichever is more appropriate. If there is evidence that non-CO2 greenhouse gas (GHG) emissions such as CH4 or N2O are more than 15% of the baseline GHG fluxes at the project site (in terms of CO2 equivalents), they must be estimated.</p>	<p>This indicator was assessed during validation and remains unchanged throughout the life of the project.</p>
<p>Conformance Y</p>	

<b>G2.3</b> - Description of how the “without-project” scenario would affect local communities in the project area.	This indicator was assessed during validation and remains unchanged throughout the life of the project.
Conformance Y	

<b>G2.4</b> - Description of how the “without-project” land-use scenario would affect biodiversity in the project area.	This indicator was assessed during validation and remains unchanged throughout the life of the project.
Conformance Y	

<b>G2.5</b> - Description of how the “without-project” land-use scenario would affect water and soil resources. (See also B5).	This indicator was assessed during validation and remains unchanged throughout the life of the project.
Conformance Y	

### 2.1.3. G3 – Project Design and Goals

The project must be described in sufficient detail so that a third-party can adequately evaluate it. Projects that operate in a transparent manner enable stakeholders and outside parties to contribute more effectively to the project.

The project proponents must:

<b>G3.1</b> - Provide a description of the scope of the project and a summary of the major climate, community and biodiversity goals.	The scope of the project and the summary of the major climate, community, and biodiversity goals have not changed since the project design.
Conformance Y	

<b>G3.2</b> - Describe each major project activity (if more than one) and its relevance to achieving the project’s goals.	Whereas, the Project Proponents made small changes to the monitoring plan since validation, no differences exist with respect to the major project activities. While on site, the verification team confirmed that the Project had successfully implemented the revised monitoring plan. The verification team confirmed that the survivorship study was carried out according to the plan and that a baseline was established for the project carbon stocks. In addition, observations in the field confirmed that the target of 302 trees per acre was
Conformance Y	

	achieved.
--	-----------

<b>G3.3</b> - Provide a map identifying the project location, where the major project activities will occur, and geo-referenced boundaries of the project site(s).	During the site visit, the verification team confirmed that the map of the project location, including the planting sites, has not changed since validation.
Conformance Y	

<b>G3.4</b> - Provide a timeframe for the project’s duration and the rationale used for determining the project lifetime. If the accounting period for carbon credits differs from the project lifetime, explain.	During Interviews with representatives of TCF and USFWS, the verification team confirmed the timeframe for the project has not changed since validation.
Conformance Y	

<b>G3.5</b> - Identify likely risks to climate, community and biodiversity benefits during the project lifetime. Outline measures that the project plans to undertake to mitigate these risks.	During Interviews with representatives of TCF and USFWS, the verification team confirmed the likely risks to climate, community and biodiversity benefits during the project lifetime, as well as the measures that the project plans to undertake to mitigate these risks for the project has not changed since validation. While onsite, the verification team interviewed local community members, who confirmed that the project area is regularly patrolled by USFWS agents.
Conformance Y	

<b>G3.6</b> - Document and defend how local stakeholders have been or will be defined.	The process by which local stakeholders have and will be defined has not changed since validation.
Conformance Y	

<b>G3.7</b> - Demonstrate transparency by: making all project documentation publicly accessible at, or near, the project site; only withholding information when the need for confidentiality is clearly justified; informing local stakeholders how they can access the project documentation; and by making key project documents available in local or regional languages, where	During the site visit, the verification team confirmed that both digital and hard copies of the project design document and the project implementation report were available at the main USFWS office on the project area. In addition, website postings and posters on site provided instructions for how local stakeholders can access project documentation through the CCBA website.
---	--

applicable.	
Conformance Y	

#### 2.1.4. G4 – Management Capacity

The success of a project depends upon the competence of the implementing management team.

The project proponents must:

<b>G4.1</b> - Document the management team’s experience implementing land management projects. If relevant experience is lacking, the proponents must demonstrate how other organizations will be partnered with to support the project.	Using web-based investigations, as well as, professional experience, the verification team was able to confirm that both TCF and the USFWS both have extensive experience implementing land management projects and therefore are more than capable of supporting the project.
Conformance Y	

<b>G4.2</b> - Demonstrate that management capacity is appropriate to the scale of the project.	As stated in indicator G4.1, the management team has extensive experience in land management. Given the relatively small scale of the Go Zero project at Marais des Cygnes, it is the professional opinion of the verification team that the management capacity is appropriate for the scale of the project.
Conformance Y	

<b>G4.3</b> - Document key technical skills that will be required to successfully implement the project and identify members of the management team or project partners who possess the appropriate skills.	The verification team reviewed the PIR for the Marais des Cygnes National Wildlife Refuge and confirmed that members of the management team or project partners who possess the appropriate skills to implement the project have been identified. In addition, during the site visit, the verification team interviewed team members responsible for implementing the project and confirmed that all of the necessary skill sets necessary to successfully implement the project are represented.
Conformance Y	

<b>G4.4</b> - Document the financial health of the implementing organization(s).	The verification team reviewed the financial documents provided by the Project Proponents and
--	---

Conformance Y	confirmed that the financial health of the implementing organization has been documented appropriately.
---------------	---

### 2.1.5. G5 - Land Tenure

There should be no significant land tenure disputes in the project area, or the project should fundamentally help to resolve these tenure issues.

Based on information about current land tenure provided in G3, the project proponents must:

<b>G5.1</b> - Guarantee that the project will not encroach uninvited on private property, community property, or government property.	The verification team confirmed that the project area has not changed since validation. During the site visit, the verification team reviewed official USFWS maps showing that the Go Zero project takes place entirely on USFWS properties.
Conformance Y	

<b>G5.2</b> - Guarantee that the project does not require the relocation of people, or any relocation is 100% voluntary and fundamentally helps resolve land tenure problems in the area.	The verification team confirmed that the project area has not changed since validation. During the site visit, the verification team reviewed official USFWS maps showing that the Go Zero project takes place entirely on USFWS properties, thus no relocation of peoples was required.
Conformance Y	

<b>G5.3</b> - Describe potential “in-migration” of people from surrounding areas, if relevant, and explain how the project will respond.	As the project takes place on USFWS land, no potential in migration is possible. Thus this indicator is not applicable to the project.
Conformance Y	

### 2.1.6. G6 - Legal Status

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

During the project design phase, the project proponents should communicate early on with relevant local, regional and national authorities and allow adequate time to earn necessary approvals. The project design should be flexible to accommodate potential modifications that may arise to secure regulatory approval.

The projects proponents must:

<b>G6.1</b> - Guarantee that no laws will be broken by the project.	The verification team confirmed that no laws have been broken by the project during this monitoring period. During the site visit the verification team was provided with guarantees from members of the USFWS that the project activities are considered legal. In addition, the verification team reviewed the USFWS annual report for the Marais des Cygnes refuge and confirmed no violations were recorded.
Conformance Y	

<b>G6.2</b> - Document that the project has, or expects to secure, approval from the appropriate authorities.	The verification team was provided with a memorandum of Understanding (MOU) between the Project Proponents and the USFWS confirming that the Project has approval from the appropriate authorities to implement the project.
Conformance Y	

### 2.1.7. G7 - Adaptive Management for Sustainability

Adaptive management is a formal, systematic, and rigorous approach to learning from the outcomes of management actions, accommodating change and improving management. It involves synthesizing existing knowledge, exploring alternative actions and making forecasts about their outcomes.

Adaptive management is based upon the premise that ecosystems and social systems are complex and inherently unpredictable. Adaptive management views land management actions as learning opportunities and as potential experiments for systematically testing assumptions and identifying adjustments that could benefit the project. It enables a project to evolve to meet changing or unanticipated needs, and can help ensure that the project realizes its goals over the long term.

The projects proponents must:

<b>G7.1</b> - Demonstrate how management actions and monitoring programs are designed to generate reliable feedback that is used to improve project outcomes.	The verification team reviewed the updated monitoring plan for the TCF Go Zero projects and agrees with the claims in the PIR that the plan is designed to provide reliable feedback aimed at improving project outcomes. In addition, during the site visit the verification team reviewed the Comprehensive Conservation Plan (CCP) and confirmed that the plan includes an adaptive management framework aimed at improving project outcomes. Whereas, the management framework provides an avenue for changes to be incorporated as necessary into the management plan, the general success of the project has not resulted in the need for changes at this time.
Conformance Y	

<b>G7.2</b> - Have a management plan for documenting decisions, actions and outcomes and sharing this information with others within the project team, so experience is passed on rather than being lost when individuals leave the project.	The verification team reviewed the project archives and confirmed that project documentation is retained in order to pass on this information to others in the management team, as well as future team members. In addition, the verification team was provided with the annual narratives documenting the progress of the project implementation.
Conformance Y	

<b>G7.3</b> - Demonstrate how the project design is sufficiently flexible to accommodate potential changes and that the project has a defined process in place to adjust project activities as needed.	As previously stated, during the site visit the verification team reviewed the CCP and confirmed that the plan includes an adaptive management framework which is sufficiently flexible to accommodate potential changes in the project. In addition, during the site visit, members of both the USFWS and TCF were able to explain the process for updating the CCP.
Conformance Y	

<b>G7.4</b> - Demonstrate an early commitment to the long-term sustainability of project benefits once initial project funding expires. Potential activities may include: designing a new project that builds on initial project outcomes; securing payments for ecosystem services; promoting micro-enterprise; and establishing alliances with organizations or companies to continue sustainable land management.	The verification team reviewed the MOU between TCF and the USFWS that establishes alliances with organizations or companies to continue sustainable land management and confirmed that the MOU contains language specifically requiring the long-term sustainability of the project by securing payment for ecosystem services.
Conformance Y	

### 2.1.8. G8 - Knowledge Dissemination

Field-based knowledge can be of value to other projects. If actively disseminated, this information can accelerate the adoption of innovative practices that bring benefits both globally and locally.

The project proponents must:

<b>G8.1</b> - Describe how they will document the relevant or applicable lessons learned.	The verification team reviewed the project design document and confirmed that the process for documenting the relevant or applicable lessons learned has been implemented as described. This was evident to the verification team as the documentation from the initial validation was available through both the Conservation Fund's
Conformance Y	

	website, as well as the website for the CCBA.
--	---

<p><b>G8.2</b> - Describe how they will disseminate this information in order to encourage replication of successful practices. Examples include: undertaking and disseminating research that has wide-reaching applications; holding training workshops for community members from other locales; promoting “farmer to farmer” knowledge-transfer activities; linking to regional databases; and working with interested academic, corporate, governmental or non-governmental organizations to replicate successful project activities.</p>	<p>The verification team reviewed the USFWS strategic plan for responding to accelerating climate change and confirmed that the plan includes lessons learned from the implementation of carbon sequestration projects. In addition, members of the USFWS confirmed that information and data gathered from the Marais des Cygnes Restoration Initiative will be incorporated into future reports as applicable.</p>
Conformance Y	

## 2.2. Climate Section

### 2.2.1. CL1 – Net Positive Climate Impacts

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

The project proponents must:

<p><b>CL1.1</b> - Use the methodologies of the Intergovernmental Panel on Climate Change’s Good Practice Guidance (IPCC GPG) to estimate the net change in carbon stocks due to the project activities. 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). Alternatively, any methodology approved by the CDM Executive Board may be used. This estimate must be based on clearly defined and defensible assumptions about how project activities will alter carbon stocks and non-CO2 GHG emissions over the duration of the project or the project accounting period.</p>	<p>The verification team reviewed both the original PDD and the PIR for this reporting period and confirmed that the estimates of the net change in carbon stocks due to project activities have not changed since validation. The estimates were determined using methodologies of the Intergovernmental Panel on Climate Change’s Good Practice Guidance (IPCC GPG) and are therefore in conformance to the requirements of this indicator.</p>
Conformance Y	

<p><b>CL1.2</b> - Factor in the non-CO2 gases CH4 and N2O to the net change calculations (above) if they are likely to account for more than 15% (in terms of CO2 equivalents) of the project’s overall GHG impact.</p>	<p>As confirmed during validation, the project activities are not expected to result in non-CO2 gases that account for more than 15% of the projects overall impact. While onsite, the verification team interviewed members of the USFWS responsible for management of the Project and were informed that no changes have taken place since validation with respect to non-CO2 gases.</p>
<p>Conformance Y</p>	

<p><b>CL1.3</b> - Demonstrate that the net climate impact of the project (including changes in carbon stocks, and non-CO2 gases where appropriate) will give a positive result in terms of overall GHG benefits delivered.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. The Project continues to generate a positive result in terms of overall GHG benefits. Thus, the requirements of this indicator have been met.</p>
<p>Conformance Y</p>	

### 2.2.2. CL2 – Offsite Climate Impacts (‘Leakage’)

The project proponents must quantify and mitigate likely negative offsite climate impacts; namely, decreased carbon stocks or increased emissions of non-CO2 GHGs outside the project boundary, resulting from project activities (referred to as “leakage” in climate change policy).

The project proponents must:

<p><b>CL2.1</b> - Estimate potential offsite decreases in carbon stocks (increases in emissions or decreases in sequestration) due to project activities.</p>	<p>As validated in the PDD, there continue to be no negative offsite impacts resulting from Project activities. This was confirmed during the site visit through visual reconnaissance and interviews with Refuge staff, as well as with a sample of visitors who frequent the refuge. Furthermore, no offsite decreases in carbon stocks due to Project activities have been observed by Refuge staff. Should leakage occur, the leakage will be measured and assessed during monitoring for CL 3. The Project is in conformance with the requirements of this indicator.</p>
<p>Conformance Y</p>	

<p><b>CL2.2</b> - Document how negative offsite impacts resulting from project activities will be mitigated, and estimate the extent to which such impacts will be reduced.</p>	<p>As no offsite negative impacts are expected from project activities, this indicator is not applicable to the Project.</p>
<p>Conformance Y</p>	

<p><b>CL2.3</b> - Subtract any likely project-related unmitigated negative offsite climate impacts from the climate benefits being claimed by the project. The total net effect, equal to the net increase in onsite carbon stocks (calculated in the third indicator in CL1) minus negative offsite climate impacts, must be positive.</p>	<p>As no offsite negative impacts are expected from project activities, this indicator is not applicable to the Project.</p>
<p>Conformance Y</p>	

### 2.2.3. CL3 – Climate Impact Monitoring

Before a project begins, the project proponents must have an initial monitoring plan in place to quantify and document changes in project-related carbon pools, and non-CO2 GHG emissions if appropriate, (within and outside the project boundaries). The monitoring plan should state which measurements will be taken and which sampling strategy will be used.

Since developing a full carbon-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 evaluated by the CCB Standards. This will be especially true for small-scale projects.

The project proponents must:

<p><b>CL3.1</b> - Have an initial plan for how they will select carbon pools and non-CO2 GHGs to be monitored, and the frequency of monitoring. Potential pools include aboveground biomass, litter, dead wood, belowground biomass and soil carbon. Pools to monitor must include any pools expected to decrease as a result of project activities. Relevant non-CO2 gases must be monitored if they account for more than 15% of the project’s net climate impact expressed in terms of CO2 equivalents.</p>	<p>The initial plan for the monitoring of carbon pools discussed in the PDD and developed by ESI has been updated in the PIR. The “monitoring umbrella” of the bottomland hardwood forests developed by the Project Proponent. TerraCarbon created the revised monitoring plan and other changes in the monitoring plan include the use of default values for soil carbon in place of previously planned soil sampling as well as a tree survival analysis after 5 years in place of the same analysis after 3 to 4 years.</p> <p>Not only was the tree survival assessed in Year 5 after planting, but will be assessed in each of the following five years. In Year 10, the monitoring will transition from a survival sampling to include the measurement of tree carbon stocks which will be repeated every 5 years. This plan was discussed with the Fund and Refuge staff while visiting the Project Area. The updated monitoring plan meets the requirements of this indicator as the Project is on track to deliver the expected climate benefits described in the PDD. SCS received guidance via email (25 October 2013) from Gareth Wishart of the CCBA that projects that are on track to deliver the expected CCB benefits meet the criteria of this indicator. In addition, the verification team was provided with the survivorship study and confirmed that the monitoring was carried out in accordance with the monitoring plan.</p>
<p>Conformance Y</p>	

#### 2.2.4. CL4 - Adapting to Climate Change and Climate Variability

Projects designed to anticipate and adapt to probable impacts of climate change and climate variability are more likely to sustain the benefits generated by the project over the long term.

The project proponents must:

<p><b>CL4.1</b> - Identify likely regional climate change and climate variability impacts, using available studies.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. Thus, it was not necessary to assess this indicator again during verification.</p>
<p>Conformance Y</p>	

<p><b>CL4.2</b> - Demonstrate that the project has anticipated such potential impacts and that appropriate measures will be taken to minimize these negative impacts.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. The verification team confirmed that the reforestation effort was carried out as described in the PDD. In addition, given the recent drought in the region and the overall success of the project, it is the professional opinion of the audit team that the mitigation efforts described in the PDD have been successful thus far.</p>
<p>Conformance Y</p>	

### 2.2.5. CL5 - Carbon Benefits Withheld from Regulatory Markets

When some carbon benefits generated by a project are not sold to satisfy regulatory requirements, additional mitigation action will be required elsewhere to meet these requirements. Therefore, withholding a portion of the project’s carbon benefits from being used in capped markets will result in greater overall climate change mitigation.

Moreover, projects that do not sell all their carbon benefits in regulated regimes have the opportunity to experiment with climate change mitigation activities other than the ones eligible under these regimes (such as avoided deforestation, which is not currently creditable under the Clean Development Mechanism). Such experimentation may generate new knowledge that is of value to carbon rule makers and other project developers.

The project proponents must:

<p><b>CL5.1</b> - Not sell at least 10% of the total carbon benefits generated by the project into regulated GHG markets (e.g., CDM, New South Wales GHG Abatement Scheme, Oregon Standard). Projects can sell these carbon benefits in a voluntary market or retire them.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. Thus, it was not necessary to assess this indicator again during verification. Using a web based review, the verification team confirmed that the Marais des Cygnes Restoration Initiative has not been registered under any program resulting in the issuance of saleable carbon credits. This indicator should be reassessed at each verification.</p>
<p>Conformance Y</p>	

## 2.3. Community Section

### 2.3.1. CM1 – Net Positive Community Impacts

The project must generate net positive impacts on the social and economic wellbeing of communities within the project boundaries and within the project lifetime. In addition, local communities and other stakeholders should be engaged early on so that the project design can be revised based on their input. Finally, projects should ensure that stakeholders can express concerns and grievances to project proponents and that these concerns are responded to in a timely manner.

The project proponents must:

<p><b>CM1.1</b> - Use appropriate methodologies (e.g. the livelihoods framework) to estimate the net benefits to communities resulting from planned project activities. A credible estimate of net benefits must include changes in community wellbeing given project activities. This estimate must be based on clearly defined and defensible assumptions about how project activities will alter social and economic wellbeing over the duration of the project. The “with project” scenario must then be compared with the baseline scenario of social and economic wellbeing in the absence of the project (completed in G2). The difference (i.e., the net community benefit) must be positive.</p>	<p>The PIR describes the numerous community benefits generated by the Project. Such benefits include additional recreation opportunities (e.g. hunting and wildlife photography), economic benefits, and research opportunities for local colleges. During the site visit, the verification team interviewed local community members who confirmed the benefits bestowed by the Project. In addition, the verification team confirmed that the Project has helped to create a partnership with the local Student Conservation Society to create internships employing local students.</p>
<p>Conformance Y</p>	

<p><b>CM1.2</b> - Document local stakeholder participation in the project’s planning. If the project occurs in an area with significant local stakeholders, the project must engage a diversity of stakeholders, including appropriate sub-groups, underrepresented groups and women living in the project vicinity. Stakeholders in the project’s area of influence must have an opportunity before the project design is finalized, to raise concerns about potential negative impacts, express desired outcomes and provide input on the project design. Project developers must document stakeholder dialogues and indicate if and how the project proposal was revised based on such input.</p>	<p>This indicator was assessed during the validation of the PDD and community members have the continued ability to comment about the Project and provide feedback. This was confirmed through interviews with Refuge staff, the Project Proponent, and representatives of the local community. Thus, the Project is in conformance with the requirements of this indicator.</p>
<p>Conformance Y</p>	

<p><b>CM1.3</b> - 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 grievances within a reasonable time period. This grievance process must be publicized to local stakeholders. 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.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed through interviews with Refuge staff, the Project Proponent, and representatives of the local community. In addition, the Project Proponent and Refuge staff also stated that no grievances have been raised about the Project. Given that no grievances were raised over this reporting period, the verification team relied on the conformance to this indicator as described during validation (also performed by SCS).</p>
<p>Conformance Y</p>	

### 2.3.2. CM2 – Offsite Community Impacts

The project proponents must quantify and mitigate likely negative social and economic offsite impacts; namely, the decreased social and economic wellbeing of communities or people living outside the project boundary, resulting from project activities.

The project proponents must:

<p><b>CM2.1</b> - Identify potential negative offsite community impacts that the project is likely to cause.</p>	<p>As validated in the PDD, there continue to be no negative offsite impacts resulting from Project activities. This was confirmed during the site visit through visual reconnaissance and interviews with Refuge staff and members of the local community.</p>
<p>Conformance Y</p>	

<p><b>CM2.2</b> - Describe how the project plans to mitigate these negative offsite social and economic impacts.</p>	<p>As no negative offsite impacts are expected from project activities, this indicator is not applicable to the project.</p>
<p>Conformance NA</p>	

<p><b>CM2.3</b> -Evaluate likely unmitigated negative offsite social and economic impacts against the social and economic benefits of the project within the project boundaries. Justify and demonstrate that the net social and economic effect of the project is positive.</p>	<p>As no negative offsite impacts are expected from project activities, this indicator is not applicable to the project.</p>
<p>Conformance Y</p>	

### 2.3.3. CM3 – Community Impact Monitoring

The project proponents must have an initial monitoring plan to quantify and document changes in social and economic wellbeing resulting from the project activities (within and outside the project boundaries). The monitoring plan should indicate which measurements will likely be taken and which sampling strategy will be used to determine how the project affects social and economic wellbeing.

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 evaluated by the CCB Standards. This will especially be true for small-scale projects.

The project proponents must:

<p><b>CM3.1</b> - Have an initial plan for how they will select community variables to be monitored, and the frequency of monitoring. Potential variables include income, health, roads, schools, food security, education and inequality. Community variables at risk of being negatively impacted by project activities should be monitored.</p>	<p>The verification team reviewed both the original PDD and the PIR for this reporting period and confirmed that there have been no changes to the community monitoring plan since validation. Interviews with the Project Proponents and members of the USFWS further confirmed the consistency of the plan. In addition, while onsite the verification team confirmed the existence of a visitors log at the refuge headquarters documenting the frequency of visitors, as described in the PDD.</p>
<p>Conformance Y</p>	

### 2.3.4. CM4 - Capacity Building

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. The project proponents must include a plan to provide orientation and training for the project’s employees and relevant community members with an eye to building locally relevant skills and knowledge over time.

The project proponents must show that capacity building is:

<p><b>CM4.1</b> - Structured to accommodate the needs of communities, not only of the project;</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed through interviews with the Project Proponent and Refuge staff. Given that no changes took place over this reporting period, with regard to this indicator, the verification team relied on the assessment of conformance to this indicator as described during validation (also performed by SCS).</p>
<p>Conformance Y</p>	

<p><b>CM4.2</b> - Targeted to a wide range of groups, not just elites;</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed through interviews with the Project Proponent and Refuge staff. Given that no changes took place over this reporting period, with regard to this indicator, the verification team relied on the assessment of conformance to this indicator as described during validation (also performed by SCS).</p>
<p>Conformance Y</p>	

<p><b>CM4.3</b> - Targeted to women to increase their participation; and</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed through interviews with the Project Proponent and Refuge staff. Given that no changes took place over this reporting period, with regard to this indicator, the verification team relied on the assessment of conformance to this indicator as described during validation (also performed by SCS).</p>
<p>Conformance Y</p>	

<p><b>CM4.4</b> - Aimed to increase community participation in project implementation.</p>	<p>The trees within the Project area have grown since the plantings in 2010. Due to this growth, recreationists such as hunters and nature photographers have increased their visitation to the project lands. The community is also actively involved in participating in the Project implementation by providing feedback. This community participation was confirmed through interviews with the Project Proponent, Refuge staff, and members of the local community.</p>
<p>Conformance Y</p>	

### 2.3.5. CM5 - Best Practices in Community Involvement

Projects that use best practices for community involvement are more likely to benefit communities. Best practices include: respect for local customs, local stakeholder employment, worker rights and worker safety.

The project proponents must:

<p><b>CM5.1</b> - Demonstrate that the project was developed with a strong knowledge of local customs and that, where relevant, project activities are compatible with local customs.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed through interviews with the Project Proponent and Refuge staff.</p>
<p>Conformance Y</p>	

<p><b>CM5.2</b> - Show that local stakeholders will fill all employment positions (including management) if the job requirements are met. Project proponents must explain how stakeholders will be selected for positions and where relevant, must indicate how traditionally underrepresented stakeholders and women, will be given a fair chance to fill positions for which they can be trained.</p>	<p>Whereas, the Project does not require employees aside from the USFWS staff who manage the plantings, the verification team confirmed that the SCA internships developed, in part, due to project activities were filled by local stakeholders.</p>
<p>Conformance Y</p>	

<p><b>CM5.3</b> - Show that the project will inform workers about their rights, and that the project complies with international rules on worker rights.</p>	<p>While on site, the verification team reviewed the procedures for informing workers about their rights. As a U.S Government facility, the USFWS Marais des Cygnes NWR has strict workers' rights requirements. The verification team confirmed that signage was posted at the refuge office and was available to all employees.</p>
<p>Conformance Y</p>	

<p><b>CM5.4</b> - 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.</p>	<p>While on site, the verification team reviewed the procedures for informing workers about safety. As a U.S Government facility, the USFWS Marais des Cygnes NWR has strict workers' safety requirements. The verification team confirmed that signage was posted at the refuge office and was available to all employees.</p>
<p>Conformance Y</p>	

## 2.4. Biodiversity Section

### 2.4.1. B1 – Net Positive Biodiversity Impacts

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

Projects should have no negative effects on species included in the IUCN Red List of threatened species (which encompasses endangered and vulnerable species) or species on a nationally recognized list (where applicable). Invasive species must not be planted by the project.

Genetically Modified Organisms (GMOs), as a relatively new form of technology, raise a host of ethical, scientific and socio-economic issues. Some GMO attributes may result in invasive genes or species. In the future, certain GMOs may be proven safe. However, given the currently unresolved issues surrounding GMOs, projects cannot use genetically modified organisms to generate carbon credits.

The project proponents must:

<p><b>B1.1</b> - Use appropriate methodologies (e.g., key species habitat analysis, connectivity analysis) to estimate changes in biodiversity as a result of the project. 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.</p>	<p>As described in the validated PDD and PIR, the Project will estimate changes in bird species in the Project area through surveys by Refuge staff every five years. During the site visit, the Refuge biologist and staff agreed that the Project has had a positive impact on the richness and variety of bird species found in the Project area due to the increased habitat area and greater habitat complexity provided by the newly planted bottomland hardwood forest (see B 3.1 for more detail). In addition, while on site the verification team observed evidence of nesting sites of local bird species within the planted areas. The Project has had a net positive impact on biodiversity. Thus, the Project is in conformance with the requirements of this indicator.</p>
<p>Conformance Y</p>	

<p><b>B1.2</b> - Describe possible adverse effects of non-native species on the area's environment, including impacts on native species and disease introduction or facilitation. If these impacts have a substantial bearing on biodiversity or other environmental outcomes, the project proponents must justify the necessity of using non-native species over native species.</p>	<p>As habitat restoration is not expected to have adverse effects, including impacts on native species and disease introduction or facilitation, this indicator is not applicable to the Project.</p>
<p>Conformance Y</p>	

<p><b>B1.3</b> - Identify all IUCN Red List threatened species and species deemed threatened on nationally recognized lists that may be found within the project boundary. Project proponents must document how project activities will not be detrimental in any way to these species.</p>	<p>This indicator was assessed during the validation of the PDD. The verifier confirmed through an interview with the Refuge biologist that Project activities would not be detrimental to either biodiversity or special status species.</p>
<p>Conformance Y</p>	

<p><b>B1.4</b> - Identify all species to be used by the project and show that no known invasive species will be used.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. Furthermore, while on site, the verification team confirmed that the species planted in the project area were native to the region. The Refuge forester concurred that only native species were planted in the Project. Thus, the Project is in conformance with the requirements of this indicator.</p>
<p>Conformance Y</p>	

<p><b>B1.5</b> - Guarantee that no genetically modified organisms will be used to generate carbon credits.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. The verification interviewed the refuge biologist who guaranteed that no genetically modified organisms were used to generate carbon credits. Thus, the Project is in conformance with the requirements of this indicator.</p>
<p>Conformance Y</p>	

#### 2.4.2. B2 – Offsite Biodiversity Impacts

The project proponents must quantify and mitigate likely negative offsite biodiversity impacts; namely, decreased biodiversity outside the project boundary resulting from project activities.

The project proponents must:

<b>B2.1</b> - Identify potential negative offsite biodiversity impacts that the project is likely to cause.	As habitat restoration is not expected to have negative biodiversity impacts, no potential negative offsite biodiversity impacts were identified.
Conformance Y	

<b>B2.2</b> - Describe how the project plans to mitigate these negative offsite biodiversity impacts.	As habitat restoration is not expected to have negative biodiversity impacts, this indicator is not applicable to the Project.
Conformance Y	

<b>B2.3</b> - 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.	As habitat restoration is not expected to have negative biodiversity impacts, this indicator is not applicable to the Project.
Conformance Y	

### 2.4.3. B3 – Biodiversity Impact Monitoring

The project proponents 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 should state which measurements will likely be taken and which sampling strategy used.

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 evaluated by the CCB Standards. This will especially be true for small-scale projects.

The project proponents must:

<p><b>B3.1</b> - Have an initial plan for how they will select biodiversity variables to be monitored, and the frequency of monitoring. Potential variables include species abundance and diversity, landscape connectivity, forest fragmentation, habitat area and diversity, etc. Biodiversity variables at risk of being negatively impacted by project activities should be monitored.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed through interviews with the Project Proponent and Refuge staff. While on site the verification team confirmed that the refuge biologist was highly qualified to assess the biodiversity component of the monitoring plan. In addition, the verification team reviewed the MDC Riparian Bird Surveys and confirmed that they were carried out in accordance with the monitoring plan.</p>
<p>Conformance Y</p>	

#### 2.4.4. B4 - Native Species Use

In most cases, species that are native to a region will have a higher biodiversity benefit than non-native species. In other cases, non-native species can be more effective than native species for rehabilitating degraded areas or providing fast growing biomass, timber, fruits and other beneficial products. For instance a project may need to use non-native species on severely degraded land to achieve ecological restoration before native species can be reintroduced.

The project proponents must:

<p><b>B4.1</b> - Show that the project will only use species that are native to the region.</p>	<p>The verification term reviewed the species list for the plating sites and confirmed that no non-native species were included in list of species planted for the Project. In addition, while on site, the verification team observed the planting sites and observed only species native to the region. Finally, the verification team received verbal confirmation from the refuge forester that only native species were used in the Project.</p>
<p>OR</p>	
<p>Justify that any non-native species used by the project are superior to native species for generating concrete biodiversity benefits (e.g., for rehabilitating degraded areas unlikely to support natives, or for producing fuel wood that reduces logging pressure on intact ecosystems).</p>	
<p>Conformance Y</p>	

#### 2.4.5. B5 - Water and Soil Resource Enhancement

Climate change and other factors may stress and degrade water and soil resources at the project site over time. Projects should enhance the quality and quantity of water and soil resources.

The project proponents must:

<p><b>B5.1</b> - Identify project activities that are likely to enhance water and soil resources.</p>	<p>As discussed in the validated PDD, one of the objectives of the Project is to enhance water and soil resources through the restoration of bottomland hardwood forest in the Refuge. The growth of the planted trees continues to meet this primary objective. During the site visit, the verifier confirmed that the Project was in conformance with this indicator by visiting the Project planting sites.</p>
<p>Conformance Y</p>	

<p><b>B5.2</b> - Credibly demonstrate that these activities are likely to improve water and soil resource compared to the baseline, using justifiable assumptions about cause and effect, and relevant studies.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. Thus, it was not necessary to assess this indicator again during verification.</p>
<p>Conformance Y</p>	

### 3.0 CCB Verification Conclusion

Following completion of SCS' duly-accredited verification process, it is our opinion that the Marais des Cygnes Restoration Initiative has been implemented in conformance with its validated Gold Level Project Design Document and continues to generate positive climate, community and biodiversity benefits (see Appendix A).

### 4.0 Verification Findings

During the course of the verification any non-conformities, deficiencies, or weaknesses of the project implementation were identified by the verification team. A description of the issues raised by the verification team, along with their resolution is described below:

**NCR 2013.1 dated 03/12/2014**

**Standard Reference:** Rules for the Use of the CCB Standards (third edition) pg. 18

**Document Reference:** Marais des Cygnes PIR G3.7

**Finding:** The Rules for the Use of the CCB Standards (third edition) requires that "The Project Implementation Report does not need to include information for indicators that has not changes from the validated PDD but shall include relevant information about project implementation and impacts, and any changes to project design, as follows:

a) (ii) G3. Stakeholder Engagement: implementation of activities and processes described in the PDD in for G3.1-12."

The Marais des Cygnes NWR PIR does not include language addressing the demonstration of transparency making all project documentation publicly accessible at, or near, the project site and therefore, is not in conformance with the criteria of this indicator.

**Client Response:** The client response was provided outside the cover of this workbook.

**Auditor Response:** The verification team was provided with a revised version of the PIR that contains evidence of transparency with respect to the availability of project information. The information

provided in the revised PIR is sufficient for resolving this issue and thus is now in conformance with respect to this indicator.

**Closing Remarks:** The Client's response adequately addresses the finding.

**NCR 2013.2 dated 03/12/2014**

**Standard Reference:** Rules for the Use of the CCB Standards (third edition) pg. 18-19

**Document Reference:** Marais des Cygnes PIR G6.1

**Finding:** The Rules for the Use of the CCB Standards (third edition) requires that "The Project Implementation Report does not need to include information for indicators that has not changes from the validated PDD but shall include relevant information about project implementation and impacts, and any changes to project design, as follows:

a) iv.) G5. Legal Status and Property Rights: implementation of activities and processes described in the PDD for G5.1-6, 9;"

Whereas, the sections of the CCB Standards First Edition do not agree with the same section of the CCB Standards Third Edition, these rules should apply to the indicators in section G6 of the first edition. The Marais des Cygnes NWR PIR does not include language guaranteeing that no laws will be broken by the project and therefore, is not in conformance with the criteria of this indicator.

**Client Response:** The client response was provided outside the cover of this workbook.

**Auditor Response:** The verification team was provided with a revised version of the PIR that contains evidence guaranteeing that no laws will be broken by the project. The information provided in the revised PIR is sufficient for resolving this issue and thus is now in conformance with respect to this indicator.

**Closing Remarks:** The Client's response adequately addresses the finding.

**NCR 2013.3 dated 03/12/2014**

**Standard Reference:** Rules for the Use of the CCB Standards (third edition) pg. 18

**Document Reference:** Marais des Cygnes PIR CM1.3

**Finding:** The Rules for the Use of the CCB Standards (third edition) requires that "The Project Implementation Report does not need to include information for indicators that has not changes from the validated PDD but shall include relevant information about project implementation and impacts, and any changes to project design, as follows:

a) (ii) G3. Stakeholder Engagement: implementation of activities and processes described in the PDD in for G3.1-12."

Whereas, the sections of the CCB Standards First Edition do not agree with the same section of the CCB Standards Third Edition, these rules should apply to the indicators in section CM1.3 of the first edition. The Marais des Cygnes NWR PIR does not include language that a conflict resolution and grievance process has been implemented and therefore, is not in conformance with the criteria of this indicator.

**Client Response:** The client response was provided outside the cover of this workbook.

**Auditor Response:** The verification team was provided with a revised version of the PIR that contains evidence ensuring that a conflict resolution and grievance process has been implemented by the project. The information provided in the revised PIR is sufficient for resolving this issue and thus is now in conformance with respect to this indicator.

**Closing Remarks:** The Client's response adequately addresses the finding.

**General Section**

**Conformance**

G1.	Original Conditions at the Project Site (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 (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
G5.	Land Tenure (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
G6.	Legal Status (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
G7.	Adaptive Management for Sustainability (Optional)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
G8.	Knowledge Dissemination (Optional)	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"/>
CL4.	Adapting to Climate Change & Climate Variability (Optional)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
CL5.	Carbon Benefits Withheld from Regulatory Markets (Optional)	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"/>
CM2.	Capacity Building (Optional)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
CM3.	Best Practices in Community Involvement (Optional)	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"/>
B2.	Native Species Use (Optional)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
B3.	Biodiversity Impact Monitoring (Optional)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

**CCBA Verification Level Attained:**

<b>APPROVED</b> - (all requirements met)	<input type="checkbox"/>
<b>SILVER</b> - (All requirements met, plus one point minimum from at least three different sections)	<input type="checkbox"/>
<b>GOLD-</b> (All requirements met, six points minimum, at least one point from four different sections)	<input checked="" type="checkbox"/>

No comments were received during the public comment period.