



## Final CCBA Project Validation Report

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*NAKAUVADRA COMMUNITY BASED REFORESTATION PROJECT*

**9 OCTOBER 2013**

*Assessment Conducted by:*

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## **1. Executive Summary**

This report presents the findings of an assessment conducted by SCS Global Services (SCS), to confirm the claim that the Nakauvadra Community Based Reforestation Project (“the Project”) conforms to the Climate, Community and Biodiversity Project Design Standards (Second Edition) at the Gold level. SCS has been approved by the Climate, Community & Biodiversity Alliance (CCBA) to provide such assessment services. The process consisted of a thorough desk review of Project documentation, including contracts and carbon accounting workbooks. In addition the audit team performed a site visit in order to visit portions of the Project area, conduct interviews with communities and other stakeholders, and evaluate the quality of the Project’s management systems.

### **1.1. Objective**

The validation audit is an independent assessment by SCS of the proposed Project activity against the assessment criteria. Validation has resulted in a conclusion by SCS as to whether the Project activity is compliant 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, Second Edition (“CCB Standards”)
- Rules for the use of the Climate, Community & Biodiversity Standards, Version 21 June 2010 (“CCB Standards Rules”)

The Project was assessed against all required criteria of the CCB Standards in order to determine whether the Project could be validated at the “Approved” level. In addition, the Project was assessed against at least one optional criterion, as set out by the CCB Standards, in order to determine whether the Project could be validated at the “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 design addresses each requirement of the CCB Standards.

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

*From the Introduction of the Nakauvadra Community Based Reforestation Project PDD,*

The Nakauvadra Community Based Reforestation Project in Fiji has been developed by Conservation International (CI), and funded through the support of FIJI Water. The Project is located on the northern

tip of Viti Levu in the Province of Ra. It is comprised of 1,135 ha of reforestation plots along the Southern and Northern slopes of the Nakauvadra Range, a 11,387 ha forest refuge that has been designated as a Key Biodiversity Area (KBA) and is earmarked as a priority site in Fiji's proposed protected area network.

The Project's main objective is to develop a multiple benefit, community based reforestation Project that:

- Reforests an area of 1,135 ha which results in the sequestration of at least 280,000 tCO<sub>2</sub> over the 30 year Project lifespan, validated and verified to the Climate, Community and Biodiversity Standards (CCBS);
- Increases forest cover around the Nakauvadra Range to expand critical habitat for endangered and endemic species living there, and enhances forest connectivity with other adjacent forest blocks;
- Enables local landowners to benefit from job creation, increased revenue, and the enhancement of livelihoods in both the short and long term.

The Project incorporates a community-based reforestation model, planting hardwood timber species on 28% of the total area which can be sustainably harvested upon reaching maturity to provide for long term income generation for the landowning communities. Reforestation of the remaining 72% of the Project site will be using native and endemic species, to reforest areas on the steeper slopes of the Nakauvadra Range which will expand forest habitat and create a 'green wall' around the more pristine upland and cloud forest ecosystems that are found in the rugged and higher elevation areas of the Range. The reforestation sites have been strategically identified to ensure the creation of new forest patches that are envisaged in the long term to help establish a conservation corridor between the Nakauvadra Range and nearby Wabu/Tomaniivi Range, 4kms away on the south western flanks of Nakauvadra.

As part of the livelihoods component of the Project, CI has worked extensively with communities and farmers in the Project zone to provide training and support in the development of new livelihood enterprises and sustainable agricultural practices, and has included the distribution of thousands of seedlings to encourage crop diversification, with fruit plants and traditional root crops to benefit families and improve food security.

## **1.5. Audit Process**

SCS commenced the validation of the Project during April 2013.

The audit process included the following steps:

- Kick-off meeting Conservation International (via phone conference)
- Desk review of initial documentation, including the Project Design Document (PDD), preliminary monitoring plans, and Project manuals
- Issuance of desk review findings
- Discussions (via phone conference) between SCS and Conservation International about the Project documentation
- Site visit between 26 June and 28 June 2013, that included:
  - Project overview by Conservation International

- Meetings at the CI office in Rakiraki to discuss the PDD, including discussions of the without Project scenario, the communities in the Project Zone and the Project design (Table 1)
- Interviews with local government officials from the Provincial Office of Ra, Department of Forests, and the Department of Agriculture (Table 1)
- Interviews with communities in the Project Zone: Drana, Narara, Rewasa, Nailawa, Nayaulevu, Navavai, Nayawe Settlement, and Nayabo (Table 1)
- Closing meeting in Rakiraki with CI staff
- Issuance of site visit findings
- Continued document review, review of finding responses, closure of findings, and report preparation
- Internal review and approval of the draft validation report
- Issuance of the draft validation report to CI
- Issuance of the final validation report to CI and the CCBA

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

Participant	Affiliation
Susana Waqainabete-Tuisese	Conservation International
Natasha Calderwood	Conservation International
Isaac Rounds	Conservation International
Vilikesa Masibalavu	Conservation International
Nemani Vuniwaqa	Conservation International, on secondment from the Department of Forests
Sakiusa Karavaki	Provincial Office of Ra
Amelia Ravu	Provincial Office of Ra
Sitiveni Tavaga	Provincial Office of Ra
Rafaele Rabouliku	Department of Forests
Binesh Dayal	Department of Forests
Uraia Racule	Department of Forests
Kesaia Raria	Department of Forests
Josefa Koli	Department of Agriculture
Taniela Navuku	Department of Agriculture
Village Chiefs and Representatives	Drana, Narara, Rewasa, Nailawa, Nayaulevu, Navavai, Nayawe Settlement, and Nayabo

## 1.6. Auditor Qualifications

### Lead Auditor: Christie Pollet-Young, SCS Global Services GHG Program Manager

Ms. Pollet-Young is the Manager of SCS’s Greenhouse Gas Verification Program who has over 15 years of experience in forestry, ranging from forest ecology research, conservation planning, and carbon offset verification in both tropical and temperate climates. Prior to her tenure at SCS, Ms. Pollet-Young worked

for the Smithsonian Institution's Center for Tropical Forest Science where she oversaw a network of forest dynamics plots throughout the tropics and The Nature Conservancy of Peru where she developed an ecoregional plan for the conservation of the Peruvian montane forests. Ms. Pollet-Young completed a Master of Forest Science from Yale University 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 40 forest carbon offset Projects around the globe under the Climate Action Reserve, the Verified Carbon Standard, the American Carbon Registry, and the Climate, Community and Biodiversity Standards. In addition, Ms. Pollet-Young is a VCS AFOLU expert in Improved Forest Management, and a 2010 winner of a CARROT award from the Climate Action Reserve.

**Auditor: Francis Eaton, SCS Global Services Verification Forester**

Francis 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. His studies in the Southwest United States were concentrated in ecological restoration, range management, and fire ecology. He spent three years working collecting field data and completing data analysis on forest restoration Projects utilizing thinning treatments and prescribed fire with the Ecological Restoration Institute. His work experience also includes complete biophysical inventories, estimation of timber volume, and wildfire risk assessments for two 3000 acre properties, as a forest consultant in northern New Mexico. Mr. Eaton is well versed in editing sampling designs and auditing field campaigns as a teaching fellow for masters-level management plan courses. Mr. Eaton currently works as a verification forester for SCS and has experience auditing AFOLU Projects under the Verified Carbon Standard and Climate, Community, and Biodiversity Alliance standards, as well as Improved Forest Management Projects under the standards of the Climate Action Reserve. In addition to his forestry background, Mr. Eaton has spent over a decade working in the cattle production industry for the second largest cattle operation in the U.S.

**Community Expert: Emele Morgan**

Ms. Emele Morgan has a Bachelor's of Arts in Sociology with a minor in Management and Public Administration from the University of the South Pacific, and is continuing her studies with a Master's in Gender and Forestry. She has been working with communities since the 1990s, when she was working as a Research Assistant on a study of the socio-economic effects of logging with rural communities in Vanua Levu. More recently she has worked with rural communities as a Project Officer with Save the Children and as a Policy and Research Officer with FemlinkPacific. In addition to this work she has recently been a Programme Officer for Transparency International, preparing training materials for community education, as well as planning and evaluating Projects. Ms. Morgan lives in Fiji, and is fluent in English and Fijian.

**Technical reviewer: Zane Haxtema, SCS Global Services Senior Verification Forester**

Mr. Haxtema 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. Haxtema 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. Haxtema 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. Haxtema has worked on forestry projects in both the northern and southern hemisphere that span four countries. Mr. Haxtema 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. Haxtema is currently a verifier under the Climate Action Reserve, the Verified Carbon Standard and the Climate, Community and Biodiversity Standard.

## **2.0 Stakeholder Comments**

The Project Design Document (PDD) was posted on the CCBA website 22 April 2013 and the public comment period extended through 22 May 2013. No written comments were received by the CCBA for the Project.

### **2.1. 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.

### **2.2. 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.

#### **2.2.1. 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.

##### **G1 - Original Conditions in the Project Area**

Indicator 1 - The location of the Project and basic physical parameters (e.g., soil, geology, climate).	SCS was able to confirm the information provided in the PDD during the desk review and through ground truthing during the site visit.
Conformance - Y	

Indicator 2 - The types and condition of vegetation within the Project Area.	During the site visit, the audit team was able to confirm the description of vegetation provided by the Project documents. Observations in and around the Project Zone, along with conversations with CI staff were consistent with results provided by the Rapid Biodiversity Assessment of the Nakauvadra Range (Morrison and Nawadra 2009).
Conformance - Y	

Indicator 3 - The boundaries of the Project Area and the Project Zone.	<p>The Project Area has been defined as the reforestation sites and the Project Zone consists of the three districts of Ra, which encompass the Project Area: Tokaimalo, Naiyalayala, and Naroko. In addition, three reforestation sites are in the district of Rakiraki and the Project Zone includes the lands owned by the mataqali of these sites.</p> <p>The audit team was able to confirm the boundaries of both the Project Area and the Project Zone during the time spent on site and found them to be in agreement with the evidence provided in the PDD. It has been noted that the reforestation sites to be planted in 2014 have an approximate delineation. This approach has been approved by an email from the CCBA dated 11 September 2013.</p> <p>While onsite, government officials from the Provincial Office of Ra also corroborated the documentation of these boundaries.</p>
Conformance - Y	



<p><b>Indicator 4</b> - 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.</p>	<p>Carbon stocks within the Project Area were determined on a per hectare basis using the following methodology: Clean Development Mechanism Methodology, AR-ACM0003 Version 01.0.0: A/R Large-scale Methodology: Afforestation and reforestation of lands except wetlands. The use of this methodology demonstrated that the Project design will generate net positive climate benefits.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 5</b> - 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.</p>	<p>Communications by the audit team with representatives from eight communities within the Project Zone verified that the information presented in the PDD and provided by the Project Proponent is accurate. The information provided is in conformance with the requirements of this indicator.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 6</b>- 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).</p>	<p>The Project documentation includes an accurate description of current land use and customary and legal property rights in the Project Zone. During the site visit, the Project Proponent and the local government officials confirmed that there are no current land tenure disputes.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 7</b> - 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.</p>	<p>The Project documentation, including the Rapid Biodiversity Assessment of the Nakauvadra Range (Morrison and Nawadra 2009) provides an adequate description of the current biodiversity in the Project Zone. The audit team determined this information to be appropriate and supported by their observations in the field and through their interviews with CI staff and members of the local communities.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 8</b> - An evaluation of whether the Project Zone includes any of the following High Conservation Values (HCVs) and a description of the qualifying attributes:</p>	<p>While the standards refer to the definition of HCVs provided by the High Conservation Value Resource Network, assessing the evaluation of HCVs requires professional judgment on the part of the audit team. Evidence provided in the PDD is consistent with observations made by the audit based on the audit team's technical understanding of HCVs.</p>
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<p><b>Indicator 8.1</b> - Globally, regionally or nationally significant concentrations of biodiversity values;</p> <ul style="list-style-type: none"> <li>a. protected areas</li> <li>b. threatened species</li> <li>c. endemic species</li> <li>d. areas that support significant concentrations of a species during any time in their lifecycle (e.g. migrations, feeding grounds, breeding areas).</li> </ul>	<p>The audit team was able to confirm the presence of globally, regionally, and nationally significant concentrations for each of the criteria listed in this indicator through a review of the results from the Rapid Biodiversity Assessment (RAP) of the Nakauvadra Range and a review of the species listed in the on the CITES and the IUCN Red List websites. The audit team also interviewed CI staff who conducted RAP and the information to support the conformance of this indicator was reconfirmed.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 8.2</b> - 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;</p>	<p>No HCVs were identified within this category.</p>
<p>Conformance - Y</p>	

<b>Indicator 8.3</b> - Threatened or rare ecosystems	No HCVs were identified within this category.
Conformance - Y	

<b>Indicator 8.4</b> - Areas that provide critical ecosystem services (e.g., hydrological services, erosion control, fire control);	Observations made by the audit team during the site assessment confirmed the claims in the Project documentation. The objectives of this Project are to promote the conservation of hydrological resources, control erosion through reforestation, and control the incidence of anthropogenic fire, which has been historically common in the Project Zone. Interviews with the Department of Forests, the Department of Agriculture, the Provincial Office of Ra and several communities confirmed the area’s importance for hydrological services. The Project funding by Fiji Water also underscores this critical ecosystem service in the Project Zone.
Conformance - Y	

<b>Indicator 8.5</b> - 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	No HCVs were identified within this category.
Conformance - Y	

<b>Indicator 8.6</b> -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).	The audit team was able to interview representatives from communities throughout the Project Zone. Community members verified the claims in the Project documentation that the Project meets the criteria of this indicator. Additional evidence confirming these claims was reviewed in the Rapid Biodiversity Assessment of the Nakauvadra Range.
Conformance - Y	

### 2.2.2. 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:

## G2 - Baseline Projections

<p><b>Indicator 1</b> - 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.</p>	<p>As described in the PDD, the ‘Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM activities’ (Version 01) was used to determine the baseline scenario. The audit team affirms that this methodology is a more robust and detailed methodology than the IPCC 2006 GL for AFOLU, as it provides guidance that is specific to reforestation projects.</p>
<p>Conformance - Y</p>	<p>The audit team was able to confirm that the methodology was appropriately applied and verified the assertion that the abandoned talasiga grasslands or cropland would have remained ‘in the without project’ scenario through site reconnaissance and interviews with communities and other stakeholders onsite. It was clear that these uninhabited areas would have remained unutilized in the absence of the Project.</p> <p>The technical knowledge, economic resources, and initiative to implement a reforestation project on these abandoned lands were missing in the ‘without project’ scenario and would have led to the continuation of these lands as abandoned grasslands.</p> <p>The initiative of the Project Proponent, with the support of the local government, and the communities in the Project Zone were fundamental to the development, design, and implementation of this Project. Furthermore, the funding for Fiji Water to reforest these abandoned grasslands was necessary to eliminate financial barriers.</p> <p>The PDD clearly provides the rationale that would support abandoned grassland or cropland as the most likely land-use scenario and every interview with Project stakeholders confirmed this analysis.</p>

<p><b>Indicator 2</b> - 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.</p>	<p>During the site visit and through conversations with the CI team, it is clear that the Project benefits would not have occurred in the absence of the Project. No laws or regulations require these areas to be reforested or require livelihood enhancement activities to be implemented. In fact, with respect to the issue of reforestation, the land owning structure where separate mataqali own native lands throughout the Project Zone, can be considered a barrier to landscape level land use planning.</p>
<p>Conformance - Y</p>	<p>Similarly, the livelihoods enhancement activities were developed in cooperation with affected communities in the Project Zone and would not have occurred in the absence of the Project as they are not required by law.</p> <p>The audit team verified conformance to the requirements of this indicator through interviews with CI, the Provincial Office of Ra, and representatives of the Project Zone.</p>

<p><b>Indicator 3</b> - 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.<sup>19</sup> 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-CO<sub>2</sub> GHG emissions such as CH<sub>4</sub> and N<sub>2</sub>O in the 'without Project' scenario. Non-CO<sub>2</sub> gases must be included if they are likely to account for more than 5% (in terms of CO<sub>2</sub>-equivalent) of the Project's overall GHG impact over each monitoring period.</p> <p>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</p>	<p>The estimated carbon stock changes associated with the 'without project' scenario have been estimated, for the Project GHG accounting period, using the CDM Methodology 'AR-ACM0003: Afforestation and reforestation of lands except wetlands' (Version 01.0.0). The audit team affirms that this methodology satisfies the requirements of this indicator.</p> <p>Through a thorough review of relevant spreadsheets, and other relevant information, the audit team confirmed the accuracy of the values reported within the PDD.</p> <p>Specifically, the Non-CO<sub>2</sub> emissions, such as CH<sub>4</sub> and N<sub>2</sub>O, were determined to be appropriately estimated through a review of a fire emissions spreadsheet. The estimate of Non-CO<sub>2</sub> emissions excluded emissions from the removal of herbaceous vegetation and transportation, which is in line with the requirements of the selected CDM methodology.</p> <p>Thus, the Project is in conformance with the requirements of this indicator.</p>
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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.	
Conformance - Y	

<b>Indicator 4</b> - 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.	The Project documentation provides an adequate description of how the 'without Project' scenario would affect communities in the Project Zone. The audit team found this description to be in agreement with observations made by the audit team onsite.
Conformance - Y	

<b>Indicator 5</b> - Describe how the 'without Project' reference scenario would affect biodiversity in the Project Zone (e.g., habitat availability, landscape connectivity and threatened species).	The PDD provides an adequate description of biodiversity in the 'without project' scenario. During the site visit, the audit team observed talasiga grasslands in the Project Zone from previous deforestation and fire disturbances. The audit team agrees that biodiversity is promoted with larger swaths of intact forest and that fragmentation, through the presence of abandoned grasslands, negatively impacts biodiversity. Interviews with CI and the Department of Forests also supported this claim in the PDD.
Conformance - Y	

### 2.2.3. 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.

### G3 - Project Design and Goals

<p><b>Indicator 1</b> - Provide a summary of the Project's major climate, community and biodiversity objectives.</p>	<p>The PDD provides an adequate summary of the Projects' major climate, community, and biodiversity objectives. The summary is consistent with the interviews with the Project Proponent and supported by interviews with community members and other Project participants such as the Provincial Office of Ra during the site visit.</p>
<p>Conformance - Y</p>	
<p><b>Indicator 2</b> - Describe each Project activity with expected climate, community and biodiversity impacts and its relevance to achieving the Project's objectives.</p>	<p>Evidence presented during the office meeting in Rakiraki and observations in and around the Project Zone (e.g. greenhouses, nurseries, sandalwood trees, bee hives) were consistent with the Project activity descriptions provided in the PDD.</p> <p>Conversations with community members also affirmed claims by CI that the Project has aimed to enhance livelihoods in the Project Zone.</p>
<p>Conformance - Y</p>	
<p><b>Indicator 3</b> - 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).</p>	<p>The audit team confirmed the locations of the Project Area, Project Zone, and surrounding locations that are predicted to be impacted by Project activities (through leakage) via discussions with the CI team, site reconnaissance, and interviews with Project stakeholders. Supported by information provided in the PDD, these interviews are consistent with the professional knowledge of the audit team. The Project was verified to be in conformance with the requirements of this indicator.</p>
<p>Conformance - Y</p>	
<p><b>Indicator 4</b> - 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.</p>	<p>The definitions of the Project lifetime and the GHG accounting period provided in the PDD were determined to be adequate for adhering to this CCB requirement. The Project start date indicates the date of the first consultations about the project with local government officials and participating mataqali. The PDD states that the GHG accounting period begins in 1 January because the first trees were planted in November 2009. The audit team finds the start date for the GHG accounting period to be acceptable because it only affects the pilot area of 108 ha, which has an</p>
<p>Conformance - Y</p>	

	<p>insignificant impact on the GHG accounting of the larger reforestation project of 1135 ha.</p> <p>In addition, a review of the contracts with Fiji Water, the community agreement, and interviews with stakeholders support the timelines identified in the PDD.</p>
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<p><b>Indicator 5</b> - 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.</p>	<p>Several risks have been identified by the Project Proponent and each has been mitigated through a detailed plan. Both the risks and mitigation plans as detailed in the PDD were verified to be appropriate and sufficient through professional judgment, interviews, and observations during the site visit.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 6</b> - 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.</p>	<p>The PDD contains an appropriate description of the measures to ensure the maintenance or enhancement of the high conservation value attributes identified in G1. The audit team agrees that the measures described in the PDD will be sufficient to ensure the maintenance or enhancement of these high conservation value attributes.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 7</b> - Describe the measures that will be taken to maintain and enhance the climate, community and biodiversity benefits beyond the Project lifetime.</p>	<p>The PDD provides an adequate description of the measures that will be taken to maintain and enhance the climate, community, and biodiversity benefits beyond the Project lifetime. The goal of the Project is to ensure the benefits in these three areas in perpetuity and the measures as well as the potential risks to these measures are well-documented in the PDD.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 8</b> - 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</p>	<p>The audit team reviewed the PDD and interviewed several Project participants and community members about the manner and process for which stakeholders were consulted about the Project. The team was provided with evidence from planning meetings involving stakeholders such as documentation of meeting minutes, lists of attendees, and logs of interactions with communities. The Project Proponent also spoke in great detail about community engagement and community participation in reforestation and livelihood enhancement activities.</p> <p>It was clear that stakeholders were informed and broadly engaged using socially and culturally appropriate methods. The Project Proponent frequently visits the villages within the Project Zone</p>
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<p>impacts to facilitate adaptive management throughout the life of the Project.</p>	<p>and meetings are widely publicized, conform to social and cultural practices of the region, and are held in the relevant local language (Fijian).</p> <p>Community members are encouraged to provide feedback to CI orally and this feedback was recorded and duly considered in the design and implementation of the Project.</p>
<p>Conformance - Y</p>	<p>During the site visit, members of each of the communities indicated that they were consulted and their input was considered in the design and implementation of the Project.</p> <p>Additionally, CI regularly visits the communities in the Project Zone and community members confirmed that the lines of communication are open and welcomed by the Project Proponent.</p>

<p><b>Indicator 9</b> - 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.</p>	<p>During onsite activities, which included interviews with representatives from villages within the Project Zone, the audit team was able to confirm that CI visited communities in the Project Zone and informed them of the CCBA public comment period. Key Project documents were made available to Project stakeholders and discussions about the Project and the CCBA public comment period was presented in the locally relevant language.</p>
<p>Conformance – Y</p>	<p>To facilitate the submission of comments to the CCBA, comment boxes were placed in the communities and encouraged to provide feedback in person, via email or via post. No comments were received for the CCBA public comment period.</p> <p>The Project is in conformance with the requirements of this indicator.</p>

<p><b>Indicator 10</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 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.</p>	<p>The Project developed a Conflict Resolution Manual which has been communicated to all participating mataqali as well as all stakeholders in the Project Zone. The conflict resolution process has evolved based on community feedback. Interviews with community members and other Project stakeholders made it apparent to the audit team that the plan was widely communicated throughout the Project Zone and procedures for collecting and disseminating issues were firmly established and in conformance with the requirements of this indicator.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 11</b> - 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.</p>	<p>During the site visit, the audit team reviewed the grant funding contracts with Fiji Water and verified that there would be an adequate flow of funds for Project implementation and to achieve the Project benefits stated in the PDD. The funding contracts have been developed in accordance with project milestones to ensure that there are adequate resources to achieve both the reforestation and livelihoods component of the Project. Successful implementation was strongly considered in the development of these agreements because payments are tied to project milestones and deliverables such as project validation or the reforestation of all Project Area sites.</p>
<p>Conformance - Y</p>	

#### **2.2.4. 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.

#### G4 - Management Capacity and Best Practices

<p><b>Indicator 1</b> - 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.</p>	<p>The Project Proponent for the Nakauvadra Community Based Reforestation Project is Conservation International, led by its Fiji office. CI has been in Fiji for over 10 years and maintains good relations with the local and national governments, natural resource agencies, and other Project stakeholders, who collaborate on the Project design and implementation.</p>
<p>Conformance – Y</p>	

<p><b>Indicator 2</b> - 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 proponents must either demonstrate how other organizations will be partnered with to support the Project or have a recruitment strategy to fill the gaps.</p>	<p>The key technical skills required for Project implementation are appropriately documented within the PDD. The audit team confirmed that the experience of the CI team and other implementing partners (e.g. the Department of Forests, the Provincial Office of Ra), as documented within the PDD, are sufficient to carry out all necessary tasks for Project success.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 3</b> - 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.</p>	<p>The training and orientation plan described in the PDD is consistent with other documentation reviewed throughout the audit process (e.g. training manuals and presentations, the Project's Operations, Health and Safety Manual, etc.). The audit team was also able to evaluate the plan through interviews with community members who were trained in tree planting and nursery care. The statements from these individuals support the Project Proponent's claim that that the training and orientation plan will likely result in the successful implementation of the Project.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 4</b> - 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.</p>	<p>The audit team conducted interviews with community representatives from eight villages and it was confirmed that representatives and other Project stakeholders will be given an equal opportunity to fill all employment positions. In addition, CI provided the audit team with the procedures for selecting employees from applicant pools, confirming adherence to the requirements of this indicator.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 5</b> - Submit a list of all relevant laws and regulations covering worker's rights in the host country.</p> <p>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</p>	<p>A thorough list of relevant laws and regulations covering worker's rights in Fiji was included in the PDD. CI also provided the audit team with a copy of the Project's Operations, Health and Safety Manual, which includes workers' rights. SCS employed a local expert to review this list and it was confirmed that the Project design is in conformance with all relevant worker's rights and protections.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 6</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>The audit team was able to confirm that the Project's Operations, Health and Safety Manual and trainings were sufficient to meet this requirement. This was confirmed through interviews with Project employees during the visits to various villages in the Project Zone.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 7</b> - Document the financial health of the implementing organization(s) to demonstrate that financial resources budgeted will be adequate to implement the Project.</p>	<p>The audit team confirmed the financial health of CI through a review of the 2012 annual report. Additional assurance was gained through the annual financial auditing CI undergoes by a third-party auditing firm.</p> <p>During the office meeting in Rakiraki, the audit team was able to view copies of the grant funding contracts with Fiji Water, which demonstrate that adequate financial resources are in place to implement the Project. The result of these reviews is that the Project is in conformance with the requirement of this indicator.</p>
<p>Conformance - Y</p>	

### 2.2.5. 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 Proponents 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.

### G5 - Legal Status and Property Rights

<p><b>Indicator 1</b> - 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.</p>	<p>The audit team, in coordination with a local technical expert, was able to confirm that the list of laws applicable to the Project provided in the PDD was both exhaustive and relevant. Additionally, during interviews with government officials, the audit team discussed the national and local laws related to Native Lands and confirmed that the Project is in conformance with this indicator.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 2</b> - Document that the Project has approval from the appropriate authorities, including the established formal and/or traditional authorities customarily required by the communities.</p>	<p>The audit team confirmed that the Project gained approval from the Provincial Office of Ra through interviews with representatives during the site visit. Additional support from the Department of Forests was also confirmed through interviews.</p>
<p>Conformance - Y</p>	<p>During the visits to several villages in the Project Zone, the approval from traditional authorities such as village Chiefs and the iTaukei Chiefs was also confirmed.</p>

<p><b>Indicator 3</b> - 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.</p>	<p>The Project's reforestation sites occur on lands which are owned by the native mataqalis who hold the customary rights. CI has undertaken documented consultations with each of the villages in the Project Zone. In addition, CI intends to sign a Community Agreement with each of the participating mataqali to define the roles and responsibilities of each party during the Project lifetime. At the time of the validation, community agreements had not been signed with the mataqali of the reforestation sites for the 2013 and 2014 plantings. The audit team confirmed that there are community agreements for the mataqali who participated in the 2009 to 2012 plantings.</p> <p>The Community Agreement in the Project's Operations, Health and Safety Manual was reviewed and is in conformance with the Project design and implementation described in the PDD. The outreach and training to inform participating mataqali of the terms of the Community Agreement, in a culturally appropriate language (Fijian), are sufficient to demonstrate that the Project is in conformance with the requirements of this indicator.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 4</b> - 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 Proponents 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.</p>	<p>The Project Area is comprised of uninhabited and minimally utilized talasiga grasslands so the Project will not require the relocation of peoples or activities. The audit team verified this through interviews with the Project Proponent, the Provincial Office of Ra and through discussions with village members.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 5</b> - 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.</p>	<p>The Project Proponent is not aware of illegal activities that could affect the Project’s climate, community or biodiversity benefits. In the event that such activities were to occur, the landowners and government departments would be involved to ensure that the landowner’s rights are not infringed upon, as described in the PDD.</p>
<p>Conformance - Y</p>	<p>In fact, the Project may serve to reduce these activities because it provides an income stream to participants as well as several initiatives to enhance community livelihoods.</p> <p>The audit team affirms that, given the circumstances surrounding the Project, there is little to no likelihood that Project benefits would be derived from illegal activities.</p> <p>The audit team also observed that the Project Proponent’s frequent visits to the communities in the Project Zone would promote the identification and communication about the existence of illegal activities, should they occur.</p> <p>Given the above, the Project is in conformance with the requirements of this indicator.</p>

<p><b>Indicator 6</b> - Demonstrate that the Project Proponents have 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 Proponents 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.</p>	<p>The Community Agreement between CI and the participating mataqali demonstrates that the Project will be undertaken on behalf of the carbon owners with their full consent. Community agreements are on file for the 2009- to 2012 planting sites and further agreements will be signed with the mataqali who own the 2013 and 2014 planting sites.</p> <p>The audit team agrees that the Project participants will be able to uphold and enforce the terms of the Community Agreement should the communication measures described in the PDD are carried out. These measures include the dissemination of an informational leaflet about the Community Agreement in Fijian, continued open communication about the Project during village visits by CI staff, and training presentations by CI to Projects participants about this issue.</p>
<p>Conformance - Y</p>	

## 2.3. Climate Section

### 2.3.1. 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.

#### CL1 - Net Positive Climate Impacts

<p><b>Indicator 1</b> - 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.</p>	<p>The estimated net change in carbon stocks due to Project activities have been estimated, for the Project GHG accounting period, using the Clean Development Mechanism Methodology, AR-ACM0003 Version 01.0.0: Afforestation and reforestation of lands except wetlands. The audit team confirmed that this methodology is a more robust and detailed methodology than the IPCC 2006 GL for AFOLU, as it provides guidance that is specific to reforestation Projects. In addition, the methodology is sufficiently rigorous to require clearly defined and defensible assumptions about how Project activities will alter GHG emissions or carbon stocks over the duration of the Project GHG accounting period.</p> <p>Through a thorough review of relevant spreadsheets, and other relevant information, the audit team confirmed the accuracy of the values reported within the PDD.</p>
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Conformance - Y	
<p><b>Indicator 2</b> - 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.</p>	<p>The Project will not generate emissions from biomass burning, synthetic fertilizer use or other site preparation activities. As previously stated (G2.3), the audit team found the Projects' exclusion of Non-CO<sub>2</sub> emissions from vehicle transport from the selected CDM methodology to be in accordance with the CDM Executive Board decision in September 2008 (CDM EB 42, Paragraph 35).</p>
Conformance - Y	The Project meets the requirements of this indicator.
<p><b>Indicator 3</b> - 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.</p>	<p>The Project will not generate emissions from biomass burning or other site preparation activities. As previously stated (G2.3), the audit team found the Projects' exclusion of Non-CO<sub>2</sub> emissions from vehicle transport from the selected CDM methodology to be in accordance with the CDM Executive Board decision in September 2008 (CDM EB 42, Paragraph 35).</p>
Conformance - Y	The Project meets the requirements of this indicator.
<p><b>Indicator 4</b> - 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).</p>	<p>A review of carbon calculations by the audit team verified that the net climate impact of the Project is positive. The audit team was able to confirm that the calculations were undertaken in conformance with the selected CDM methodology. The accuracy of the reported values was confirmed through a review of Project Proponent-supplied spreadsheets, and other documentation.</p>
Conformance - Y	
<p><b>Indicator 5</b> - 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.</p>	<p>The Project will not be generating tradable carbon credits because it is being funded through a grant from Fiji Water. As such, the PDD specifies that double counting will be avoided.</p>
Conformance - Y	The Project is in conformance with the requirements of this indicator.

### 2.3.2. CL2 – Offsite Climate Impacts ('Leakage')

The Project Proponents must quantify and mitigate increased GHG emissions that occur beyond the Project Area and are caused by Project activities (commonly referred to as 'leakage').

#### CL2 - Offsite Climate Impacts (Leakage)

<p><b>Indicator 1</b> - 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.</p>	<p>The PDD states that leakage could only occur if agricultural activities and grazing are displaced. However, since the talasiga grasslands are abandoned and minimally used, the potential for leakage is low. This potential is further reduced through the community participation in siting of Project activities. This assumption was verified during interviews with Project stakeholders and community representatives in the Project Zone.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 2</b> - Document how any leakage will be mitigated and estimate the extent to which such impacts will be reduced by these mitigation activities.</p>	<p>The audit team confirmed that leakage will be monitored during the Project lifetime. Should such leakage occur, the leakage will be measured and assessed during monitoring for CL 2. The Project is in conformance with the requirements of this indicator.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 3</b> - 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).</p>	<p>The quantification of expected offsite climate impacts was determined to be negligible. The observations of the audit team during the site visit agree with this assessment. The Project is in conformance with the requirements of this indicator.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 4</b> - Non-CO<sub>2</sub> gases must be included if they are likely to account for more than a 5% increase or decrease (in terms of CO<sub>2</sub>-equivalent) of the net change calculations (above) of the Project's overall off-site GHG emissions reductions or removals over each monitoring period.</p>	<p>Through onsite field observations, the audit team agrees that offsite non-CO<sub>2</sub> emissions as a result of Project activities will be negligible and do not need to be included in the calculation of off-site GHG emissions reductions or removals over each monitoring period. However, this indicator will be re-evaluated during verification.</p>
<p>Conformance - Y</p>	

### 2.3.3. CL3 – Climate Impact Monitoring

Before a Project begins, the Project Proponents must have an initial monitoring plan in place to quantify and document changes (within and outside the Project boundaries) in Project-related carbon pools, Project emissions, and non-CO<sub>2</sub> GHG emissions if appropriate. The monitoring plan must identify the

<p><b>Indicator 1</b> - Develop an initial plan for selecting carbon pools and non- CO<sub>2</sub> 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 CO<sub>2</sub> -equivalent benefits generated by the Project. Non-CO<sub>2</sub> gases must be included if they are likely to account for more than 5% (in terms of CO<sub>2</sub> - 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.</p>	<p>The audit team affirms that the Project Proponent has developed an initial monitoring plan for selecting carbon pools and non-CO<sub>2</sub> GHGs, which includes descriptions of direct measurements and frequencies of data collection. Overall, the initial monitoring plan conforms to the requirements of this indicator.</p>
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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.

### CL3 - Climate Impact Monitoring

Conformance - Y	
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<b>Indicator 2</b> - 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.	The full climate monitoring plan is under development and will be disseminated to each village in the Project Zone as well as to Project stakeholders.
Conformance - Y	

## 2.4. Community Section

### 2.4.1. 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.

#### CM1 - Net Community Impacts

<p><b>Indicator 1</b> - 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.</p>	<p>The audit team affirms that the methodologies for estimating the impacts of the Project on communities, such as the Open Standards for the Practice of Conservation, are appropriate. The audit team reviewed the description of community impacts in the PDD along with other supporting documentation and confirmed that methodologies include criteria for assessing the effect of the Project on natural resources and ecosystem services identified to be important by communities in the Project Zone.</p> <p>The interviews with Project stakeholders and the villages in the Project Zone corroborate the assessment provided in the PDD.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 2</b> - Demonstrate that no High Conservation Values identified in G1.8.4-6 will be negatively affected by the Project.</p>	<p>The PDD provides a description of the Project’s potential impact on High Conservation Values (HCVs), along with claims that’s the Project with result in net positive impacts for climate, community, and biodiversity. The audit team agreed that reforestation Projects, by design, maintain and enhance HCVs.</p>
<p>Conformance - Y</p>	

### 2.4.2. CM2 – Offsite Stakeholder Impacts

The Project Proponents 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.

#### CM2 - Offsite Stakeholder Impacts

<b>Indicator 1</b> - Identify any potential negative offsite stakeholder impacts that the Project activities are likely to cause.	The PDD claims that the Project is not expected to have a negative effect on offsite stakeholders. This assertion was verified during the site visit through interviews with the Project Proponent, villages in the Project Zone, and Project stakeholders.
Conformance - Y	

<b>Indicator 2</b> - Describe how the Project plans to mitigate these negative offsite social and economic impacts.	While the Project does not anticipate negative impacts to offsite stakeholders, a plan is described in the PDD to extend the work of the Project to other districts and to tenant farmers.
Conformance - Y	The Project is in conformance with the requirements of this indicator.

<b>Indicator 3</b> - Demonstrate that the Project is not likely to result in net negative impacts on the well-being of other stakeholder groups.	Through a review of the PDD and after the site visit, it was verified that the Project as designed would not likely result in net negative impacts on the well-being of other stakeholder groups.
Conformance - Y	

### 2.4.3. CM3 – Community Impact Monitoring

The Project Proponents 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.

#### CM3 - Community Impact Monitoring

<p><b>Indicator 1</b> - 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).</p>	<p>As reported in the PDD, an initial plan was established for selecting variables to be monitored, along with the frequency of monitoring and reporting. The PDD contains an initial monitoring plan that contains a list of indicators and methods for monitoring that will take place with respect to the community development objectives within the Project Zone. The audit team verified that the initial plan for monitoring is in accordance with the requirements of this indicator.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 2</b> - 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.</p>	<p>The initial plan for the monitoring of HCVs related to community well-being in the Project Zone focuses on watershed protection in the Nakauvadra Range and the maintenance of cultural and religious areas in the Project Zone. The initial plan describes how these HCVs will be maintained or enhanced and is thus in conformance with the requirements of this indicator.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 3</b> - 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.</p>	<p>The PDD states that the full monitoring plan for the community component of the Project will be completed in the summer of 2013 and will be disseminated to each village in the Project Zone and to Project stakeholders.</p> <p>This plan is in accordance with the requirements of this indicator.</p>
<p>Conformance - Y</p>	

## 2.5. Biodiversity Section

### 2.5.1. 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.

**B1 - Net Positive biodiversity Impacts**

<p><b>Indicator 1</b> -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.</p>	<p>As described in the PDD, CI conducted a Rapid Biodiversity Assessment in 2008 and this information will serve as the baseline. Paired with the professional knowledge of the CI team, this appropriate methodology and the continued presence of CI in the region will sufficiently estimate the changes in biodiversity as the result of the Project over its lifetime. The audit team agrees with the assumption by the Project Proponent that the reforestation of abandoned talasiga grasslands will likely have a net positive impact on biodiversity.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 2</b> -Demonstrate that no High Conservation Values identified in G1.8.1-348 will be negatively affected by the Project.</p>	<p>As previously stated in this report (CM1.2), the PDD provides a description of the Projects impacts on High Conservation Values (HCVs), along with claims that the Project will result in net positive impacts for climate, community, and biodiversity. The audit team verified that this community based reforestation Project will maintain and enhance HCVs.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 3</b> - 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.</p>	<p>The PDD includes a list of the species to be included in the Project activities and the audit team agrees with the assessment that none are invasive species. In addition, observations made during the site visit confirmed that no invasive species will be introduced and that invasive species are not expected to increase as a result of Project activities.</p>
<p>Conformance - Y</p>	



<b>Indicator 4</b> - 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.	The audit team concurs with the assessment of CI and the Department of Forests that the use of the two non-native hardwood species, teak and mahogany, will not likely have a negative impact on the local natural landscape. The siting of these species and the intermixing with native species will serve to minimize any potential adverse effects to the region's environment. Additionally, the biodiversity monitoring, assessed during Project verification should identify any potential issues caused by the non-native species.
Conformance - Y	

<b>Indicator 5</b> - Guarantee that no GMOs will be used to generate GHG emissions reductions or removals.	The audit team verified the claims in the PDD that no GMOs will be used to generate GHG emissions reductions or removals. Observations made during the site visit supported these claims.
Conformance - Y	

## 2.5.2. B2 – Offsite Biodiversity Impacts

The Project Proponents must evaluate and mitigate likely negative impacts on biodiversity outside the Project Zone resulting from Project activities.

### B2 - Offsite Biodiversity Impacts

<b>Indicator 1</b> - Identify potential negative offsite biodiversity impacts that the Project is likely to cause.	The audit team agrees with the Project Proponent that the reforestation of abandoned talasiga grasslands will enhance biodiversity. However, the Project has appropriately identified the potential negative impact of the collection of species stock (wildings) to the native forest in the Nakauvadra Range. During the site visit, the Department of Forests agreed with this assessment.
Conformance - Y	

<b>Indicator 2</b> - Document how the Project plans to mitigate these negative offsite biodiversity impacts.	Training in the collection and propagation of wildings described in the PDD is an appropriate mitigation plan. This approach was discussed with the Project Proponent and confirmed by the Department of Forests to be appropriate during the site visit. This plan is in conformance with the requirements of this indicator.
Conformance - Y	

<p><b>Indicator 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.</p>	<p>As described in the PDD, the net effect of the Project on biodiversity will be positive. The audit team agrees that the planting of over 314,000 trees species in an effort to promote forest connectivity would likely be greater than any unmitigated impacts from the collection of wildlings and the introduction of two non-native species that have been widely planted in the region.</p>
<p>Conformance - Y</p>	<p>The Project is in accordance with the requirements of this indicator.</p>

### 2.5.3. 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 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.

#### B3 - Biodiversity Impact Monitoring

<p><b>Indicator 1</b> - 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).</p>	<p>The audit team reviewed the initial monitoring plan and verified that the plan includes justification for the selected variables, as well as the temporal guidelines for implementation. This plan is in conformance with the requirements of this indicator.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 2</b> - 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.</p>	<p>The Project Proponent proposes to monitor the Project’s two HCV species, the Fiji ground frog and Fiji Long-legged warbler, in addition to annually monitoring threatened and endangered species. The audit team agrees that the initial plan is appropriate for assessing the effectiveness of measures used to maintain or enhance HCVs in the Project Zone.</p>
<p>Conformance - Y</p>	

<p><b>Indicator 3</b> - 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.</p>	<p>The PDD states that the full monitoring plan for the biodiversity component of the Project is in development and will be disseminated to each village in the Project Zone and to Project stakeholders.</p> <p>This plan is in accordance with the requirements of this indicator.</p>
<p>Conformance - Y</p>	

## 2.6. Gold Level Section

### 2.6.1. 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.

#### GL1 - Climate Change Adaptation Benefits

<p><b>Indicator 1</b> -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.</p>	<p>N/A</p>
<p>Conformance: N/A</p>	

<b>Indicator 2</b> - 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.	N/A
Conformance: N/A	

<b>Indicator 3</b> - Demonstrate that current or anticipated climate changes are having or are likely to have an impact on the well-being of communities <sup>51</sup> and/or the conservation status of biodiversity <sup>52</sup> in the Project Zone and surrounding regions.	N/A
Conformance: N/A	

<b>Indicator 4</b> - Demonstrate that the Project activities will assist communities and/or biodiversity to adapt to the probable impacts of climate change.	N/A
Conformance: N/A	

### 2.6.2. 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.

#### GL2 - Exceptional Community Benefits

<b>Indicator 1</b> - 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	N/A
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poverty line.	
Conformance: N/A	

<b>Indicator 2</b> - 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.	N/A
Conformance: N/A	

<b>Indicator 3</b> - 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.	N/A
Conformance: N/A	

<b>Indicator 4</b> - 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.	N/A
Conformance: N/A	

<b>Indicator 5</b> - 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.	N/A
Conformance: N/A	

### 2.6.3. 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:

#### GL3 - Exceptional Biodiversity Benefits

<b>Indicator 1</b> - Vulnerability - Regular occurrence of a globally threatened species (according to the IUCN Red List) at the site:	See Below
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<b>Indicator 1.1</b> - Critically Endangered (CR) and Endangered (EN) species - presence of at least a single individual; or	The audit team reviewed the list of critically endangered and endangered species provided in the PDD and supported by the RAP conducted by CI in 2008(Morrison and Nawadra 2009). This list was compared with the species information from the IUCN Red List.
Conformance - Y	The team verified that the Project meets the criteria of this gold-level indicator. During the site visit, the audit team also received further confirmation of this information through interviews with the the Project Proponents, many of who participated in the RAP, and other stakeholders in the Project Zone.

<b>Indicator 1.2</b> - Vulnerable species (VU) - presence of at least 30 individuals or 10 pairs.	N/A
Conformance: N/A	

### **3.0 CCB Validation Conclusion**

Following completion of SCS' duly-accredited validation process, it is our opinion that the Nakauvadra Community Based Reforestation Project conforms to the CCBA Climate, Community and Biodiversity Project Design Standards (Second Edition) at the Gold Level (see Appendix A).

### **4.0 Findings**

Please see section 3.1 of this report for descriptions of the types of findings.

**NIR 2013.1 dated 05/07/2013**

**Standard Reference:** CCB Standards Second Edition, Section G1.3

**Document Reference:** Nakauvadra Reforestation CCB PDD, p7 and 45

**Finding:** The CCB Standard requires that the boundaries of the project area and the project zone are included in the PDD. While the PDD states, "The total project area encompasses 1,135 ha and currently includes 51 individual reforestation sites ... we anticipate an additional 8 plots of various sizes to be established by June 2014 to complete the project area."

Page 45 of the PDD states that the planting sites for 2013 and 2014 have not been marked on the maps. Please provide evidence that the description of the boundaries of the project area encompasses all reforestation sites, including the "additional 8 plots of various sizes."

**Client Response:** The 2013 planting sites have now been marked out by GPS, and the plots have been added to the PDD maps (Fig 3, 7, 8, 17 - 21). The 8 planting sites that remain for 2014 have been field checked by the CI team and their geographic locations cross checked with the lands registry and are confirmed to be located within the administrative boundaries of Tokaimalo, Naroko and Rakiraki, and within the outlined project zone boundary. Once the GPS points and Community Agreements have been signed for these plots, their areas will be added to project maps and to the monitoring reports.

All relevant maps in the PDD have been modified to reflect requested changes, including incorporation of 2013 planting sites, none of which affects any other project parameters, development or implementation activities.

**Auditor Response:** The Project Area does not include the 2014 planting sites so the boundaries of this component of the Project has not been defined. Please note that any changes to the Project Area would require a new validation per the CCBA Rules.

**Client Response 2:** The borders of the 2014 reforestation sites will not be marked out by GPS until planting is about to begin so it is not yet possible to delineate their exact boundaries. However, the new sites will all be on land that CI is already working with under the project, in effect extensions to areas already planted between 2009-2013. As discussed with the CCB and confirmed in an email sent by Joanna Durbin on Sept 11th, the following approach will be adopted: In the PDD CI will mark on a map the GPS boundary locations of those sites that have already been planted (2009-2013), and will identify the spatial location of the 2014 target area on the map as the total project area. Once the GPS boundaries of the plots in which reforestation will occur have been marked out within these identified areas, they will be included in the project monitoring plan. As long as these sites meet all the same baseline conditions as the other reforestation sites in the project, and planting takes place within the project area, then the inclusion of the GPS points at a later date will not require a re-validation of the project area once the project is verified.

The map in Figure 7 has therefore been revised to show the spatial location of the 2014 areas in which the reforestation activities will take place.

**Auditor Response 2:** The audit team agrees with and supports the guidance provided by the CCBA about the proposal to delineate the Project Area boundaries for the 2014 reforestation plots. This proposal is in conformance with the requirements of this indicator.



**NIR 2013.2 dated 05/07/2013**

**Standard Reference:** CCB Standards Second Edition, Section G1.8.1.c

**Document Reference:** Nakauvadra Reforestation CCB PDD, p25-26

**Finding:** The CCB Standard requires "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...(C) endemic species." Additionally, footnote 15 states "Species for which the entire global range is restricted to the site, the region or the country (the level of endemism must be defined)."

Please provide the required information related to the "level of endemism."

**Client Response:** Table 4 has been updated to show the level of endemism for the species listed (all are Fiji endemics).

**Auditor Response:** The information provided is sufficient to close this finding.

**NIR 2013.3 dated 05/07/2013**

**Standard Reference:** CCB Standards Second Edition, Section G1.8.1.a

**Document Reference:** Nakauvadra Reforestation CCB PDD, p23

**Finding:** The CCB Standard requires "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."

Additionally, footnote 13 states that protected areas includes "...areas that have been proposed for protected area status by the relevant statutory body but have not yet been officially declared..."

The PDD states that "A 2009 study of priority forests for protection strongly indicated that the Nakauvadra Range as a key biodiversity area in Fiji should be protected (Olson et.al 2009). The National Protected Area Committee (PAC) has accepted this paper and its recommendations for priority zones to be conserved." Please provide evidence that the Olson paper and its recommendations for priority zones has been accepted by the PAC.

**Client Response:** Meeting minutes of the PAC terrestrial subcommittee (Nov 2011) agreeing that the Nakauvadra Range should be considered a priority area for conservation is provided. Attachment name: Minutes of terrestrial subcommittee meeting 24 Nov 2011.

**Auditor Response:** The information provided is sufficient to close this finding.

**NIR 2013.4 dated 05/07/2013**

**Standard Reference:** CCB Standards Second Edition, Section G2.1

**Document Reference:** Nakauvadra Reforestation CCB PDD, p29

**Finding:** The CCB Standard requires that "The project proponents must develop a defensible and well-documented 'without-project' reference scenario that must:

"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 landuse scenarios and the associated drivers of GHG emissions and justifying why the land-use scenario selected is most likely."

Additionally, footnote 17 states "In cases where a published methodology is used, the full reference must be given and any variations from the published methodology must be explained."

Section G2.1 of the PDD states "The project proponent has carried out the baseline scenario and additionality analysis using the step-wise approach adapted from the 'Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM activities' (Version 01)." Given that the PDD does not provide the full step-wise approach prescribed by the methodological tool, please provide an explanation of the variation denoted by the term "adapted."

**Client Response:** As the project is not generating carbon credits, the CDM tool was adapted for use by following steps 1 and 2 of the methodology (identification of alternative land use scenarios and barrier analysis). Step 3, the investment analysis, was not deemed necessary to complete as the barrier analysis was sufficient to demonstrate that the project activity is not the most likely landuse scenario and that the maintenance of grasslands is the most plausible scenario. The PDD (p28) has been updated to clarify what this adaptation is.

**Auditor Response:** The information provided is sufficient to close this finding.

**NIR 2013.5 dated 05/07/2013**

**Standard Reference:** CCB Standards Second Edition, Section G2.1 and The Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities, Step 4 sub-section 33

**Document Reference:** Nakauvadra Reforestation CCB PDD, Section G2.1

**Finding:** The combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities states that the common practice analysis must

"Provide an analysis to which extent similar forestation activities to the one proposed as the A/R CDM project activity have been implemented previously or are currently underway. Similar forestation activities are defined as that which are of similar scale, take place in a comparable environment, inter alia, with respect to the regulatory framework and are undertaken in the relevant geographical area, subject to further guidance by the underlying methodology. Other registered A/R CDM project activities shall not to be included in this analysis. Provide documented evidence and, where relevant, quantitative information. Limit your considerations to any period since 31 December 1989."

Additionally, footnote 17 states "In cases where a published methodology is used, the full reference must be given and any variations from the published methodology must be explained."

The information provided in the PDD claims pine plantation as an alternative baseline project scenario, which is similar to the one proposed as the A/R CDM project activity, yet does not provide evidence that sub-section 33 of step 4 common practice analysis was considered in the project design. Please provide evidence that activities prescribed by sub-section 33 of step 4 common practice analysis were considered in the project design. Given what has been written in the PDD, this may be a variation from the methodology; if this is the case, please provide an explanation for the variation.

**Client Response:** Step 4 of the tool was not carried out because it was felt that sufficient justification which met the requirements of the CCB in showing what the most likely land use scenario was had already been provided. There are no similar reforestation projects of this kind in Fiji. This project is the first native reforestation project on the island which is also community owned and led. However, a paragraph to explain why the project is not common practice has been added to the PDD as means of clarification (p30).

**Auditor Response:** The information provided is sufficient to close this finding.

**NIR 2013.6 dated 05/07/2013**

**Standard Reference:** CCB Standards Second Edition, Section G2.3 and CDM Methodological tool - Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities

**Document Reference:** Nakauvadra Reforestation CCB PDD, p32

**Finding:** Footnote 17 for section G2.3 of the CCB Standards states 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."

Additionally, the Nakauvadra PDD claims the project used CDM tool "Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities (version 02.1.0)," whereas the most current version of the tool is "Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities (version 03.0.0)." Please provide an explanation of why the most recent version of the tool was not used by the project.

**Client Response:** As confirmed in email communications between the CCB Secretariat and SCS, the CCB standards do not require that project proponents utilise the most current methodology and tools, as long as they can demonstrate that the methodology and tools used generate net positive impacts. The most current CDM tool was released at the end of Nov 2012. By then, the climate calculations for the PDD had already been completed using what was at the time the most current and conservative version of the CDM tool (02.1.0). Given the above, and the fact that the project is not generating carbon credits, the decision was made not to redo this section at this advanced stage of PDD development.

**Auditor Response:** An email from Gareth Wishart of the CCBA sent on 24 July 2013 confirms the appropriateness of the client's response. While the most current methodology is more conservative, the Nakauvadra Reforestation Project does indeed generate net positive climate impacts, as required by the CCB Standards. Furthermore, the use of a carbon accounting standard is not required when quantified emissions reductions for use as an offset are being generated by the project. The information provided is sufficient to close this finding.

**NIR 2013.7 dated 05/07/2013**

**Standard Reference:** CCB Standards Second Edition, Section G3.5

**Document Reference:**

**Finding:** The CCB Standards require that the project proponent "Identify 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."

Please indicate whether the landowners have the subsurface rights to their land in the project area. In the event that they do not, please outline measures adopted to mitigate these risks.

**Client Response:** A mitigation plan for this has been addressed in the PDD in section G3.5.

**Auditor Response:** The added information in the PDD with regard to the risks related to the community agreements, the continuation of livelihood activities, and subsurface rights identifies the issues and provides a reasonable mitigation plan. As such, this information is sufficient to close this finding.

**NIR 2013.8 dated 05/07/2013**

**Standard Reference:** CCB Standards Second Edition, Section G3.11

**Document Reference:** Nakauvadra Reforestation CCB PDD, p63

**Finding:** The CCB Standards require that the project proponent "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."

In response, the project states that "The grant fund from Fiji Water is adequate to support the development and implementation of activities to meet all planned targets and deliverables linked with the project objectives (through 2039)." Please provide evidence of the Fiji Water Grant Fund, as well as, evidence that this grant is likely to provide an adequate flow of funds for project implementation and to achieve the anticipated climate, community and biodiversity benefits.

**Client Response:** During the field visit, documentation was shown to the validator including signed grant agreements between the project donor and CI, and approved budget totals which covered the realisation of development and implementation activities over the life of the project.

**Auditor Response:** The cited documents were reviewed onsite. This information provided is adequate to close the finding.

**NIR 2013.9 dated 05/07/2013**

**Standard Reference:** CCB Standards Second Edition, Section G3.4

**Document Reference:** Nakauvadra Reforestation PDD, p39 and 49, Community Agreement, Buasali-CI

**Finding:** The Community Agreement between CI and Mataqali Buasali states that the community does not have the right to harvest the timber until 30 years after the date of the agreement. However, pages 39 and 52 of the PDD states that the communities have the right to harvest teak and mahogany after 20 years. Please clarify when the communities are able to harvest timber and how this timeline conforms to the stated project lifetime and GHG accounting period described on page 49 of the PDD.

**Client Response:** The communities can begin to harvest timber 20 years from the date of planting of the non native species, so harvesting will begin at the earliest in 2029 (for the teak planted in 2009) and continue thereafter. This schedule conforms with the project lifetime and GHG accounting period given in the PDD. Further community consultation is currently underway with the landowners to ensure there is absolute understanding about when the teak harvesting can begin. The 30 year timeframe given in the referenced CA was meant to provide guidance regarding the harvesting of tree species more generally, of which the main focus are the native species which cannot be harvested under any circumstances during the project lifetime.

**Auditor Response:** The community agreement states that "the Mataqali Buasali undertakes that there will be no harvesting of timber until 30 years after the date of this Agreement." The agreement as designed contains a contractual agreement to not harvest timber for 30 years, which is not mere guidance. Please provide evidence that this language would allow the Mataqali to harvest 20 years from the date of planting without violating the terms of the contract.

**Client Response 2:** The revised CA template provided in the Operations, Health and Safety Manual provides the terms under which all communities will engage in the project, and against which the project will be verified in later years. The dates for harvesting are revised to 20 years from date of planting.

**Auditor Response 2:** The information provided is adequate to close the finding.

**NIR 2013.10 dated 05/07/2013**

**Standard Reference:** CCB Standards Second Edition, Section G5.6

**Document Reference:** Nakauvadra Reforestation PDD, 49, Community Agreement, Buasali-CI

**Finding:** Page 49 of the PDD states that the project will not be generating carbon credits. However, the Community Agreement between Mataqali Buasali and CI states that "All Rights to sequestered carbon surplus to the requirements of Fiji Water will revert to Mataqali Buasali. Conservation International will assist the Mataqali in seeking buyers on the international carbon market." Please clarify whether carbon credits from the project will be sold.

**Client Response:** As explained to the validator during the field audit, the project is not generating carbon credits as a result of a change in direction to the project during the early development process. This change was fully discussed and communicated with all the mataqali involved, and no negative repercussions were identified given the main project benefits for communities result from the harvesting of the teak species and the development of alternative livelihood activities.

**Auditor Response:** During the site visit, the Project Proponent stated that the project will not be generating tradable carbon credits. However, the Community Agreement has been written to include the undertaking by CI to assist the mataqali in seeking buyers for carbon credits should there be a sequestered carbon surplus to the requirements of Fiji Water. Please clarify if it would be possible for such a surplus to occur. While it is understood that the project no longer intends to trade carbon credits, the Community Agreement, as designed, appears to oblige CI to undertake such an activity should it occur.

**Client Response 2:** The revised CA template provided in the Operations, Health and Safety Manual provides the terms under which all communities will engage in the project, and against which the project will be verified in later years. Although no carbon credits are to be generated or traded under this project, and communities are fully aware and supportive of this change, the CA no longer contains reference to CI providing assistance in the sale of surplus credits.

**Auditor Response 2:** The revision to the Community Agreement is in line with the project design described in the PDD. The information provided is sufficient to close this finding.

**NIR 2013.11 dated 05/07/2013**

**Standard Reference:** CCB Standards Second Edition, Section G3.4

**Document Reference:** Nakauvadra Reforestation PDD, 49, Community Agreement, Buasali-CI

**Finding:** The Community Agreement between CI and Mataqali Buasali states that the term of the agreement will be 30 years from the effective date of the agreement (30 March 2011). Page 49 of the PDD states that the project will end in 2039. Please state how the terms of the agreement such as the maintenance of monitoring of the forest and of fire risk and will be carried out beyond the project lifetime and GHG accounting period.

**Client Response:** The project will end in 2039. If CI is able to continue carrying out ongoing monitoring and fire management activities in conjunction with the communities beyond this date it will do so as this will result in a win-win outcome for all. However, to avoid confusion about the official end date of the project, all agreements from 2013 onwards have June 2039 as the effective end date of the agreement instead of a floating 30 year period.

**Auditor Response:** Section G3.4 of the PDD defines the project start date to be 1 April 2009 with a 30-year project lifetime. The Community Agreement provided states that the term of the agreement is 30 years from the effective date of the agreement. As designed, this agreement would not allow for the agreement to terminate at the end of the project lifetime unless all of the agreements are to be signed on the project start date. Please explain how the agreement is consistent with the project design contained in the PDD unless both parties intend to continue these activities outside of the CCB Nakauvadra Community Based Reforestation Project.

**Client Response 2:** The revised CA template provided in the Operations, Health and Safety Manual provides the terms under which all communities will engage in the project, and against which the project will be verified in later years. The effective date of termination for the project has been changed to 3039 as in accordance with the length of the project.

**Auditor Response 2:** The revision to the Community Agreement to state a contract end date of 30 June 2039 is in line with the 30-year project term described in the PDD. The information provided is sufficient to close this finding.



**NIR 2013.12 dated 05/07/2013**

**Standard Reference:** CCB Standards Second Edition, Section G3.3

**Document Reference:**

**Finding:** The CCB Standards require that the project proponent "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).

Please identify on a map where the non-reforestation project activities (e.g. nursery establishment, fish ponds, bee-keeping, etc.) will occur. In addition, please identify on a map the surrounding locations that are predicted to be impacted by project activities through leakage.

**Client Response:** A map showing the location of livelihood activities has been added to the PDD as Fig 22. As described in section CL2.1 no leakage is predicted to occur because all the reforestation activities are taking place on vacant grasslands which have no other functional use, so these areas have not been identified on the map.

**Auditor Response:** The information provided is sufficient to close this finding.

**NIR 2013.13 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section G1.4, CL1.1 AR-TOOL14 pg 22

**Document Reference:** PDD 1135ha Calculation CCB Final, Nakauvadra Reforestation CCB PDD - April 2013 pg 35

**Finding:** The CCB Standards require that "The project proponents must provide a description of the project zone, containing all the following information:

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 (IPCC 2006 GL for AFOLU) or a more robust and detailed methodology."

Additionally, footnote 6 states "In cases where a published methodology is used, the full reference must be given and any variations from the published methodology must be explained."

The carbon fraction of tree biomass provided by the most current version of the methodology is 0.47 t C (t.d.m.)<sup>-1</sup>, however the value used by the project is 0.50 t C (t.d.m.)<sup>-1</sup>. Please explain and justify this variation to the methodology.

**Client Response:** The CCB standards do not require that project proponents utilise the most current methodology and tools, as long as they can demonstrate that the methodology and tools used generate net positive impacts. The most current CDM tool for calculating carbon stocks in A/R project activities was released at the end of Nov 2012. By then, the climate calculations for the PDD had already been completed using what was at the time the most current and conservative version of the CDM tool (02.1.0) which recommended using 0.50 as the default value. Given the above, and the fact that the project is not generating carbon credits, but has demonstrated it is generating net positive climate benefits, the decision was made not to redo the GHG accounting section at this advanced stage of PDD development.

**Auditor Response:** An email from Gareth Wishart of the CCBA sent on 24 July 2013 confirms the appropriateness of the client's response. The information is sufficient to close this finding.

**NIR 2013.14 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section G1.4, CL1.1, AR-TOOL14 pg 22

**Document Reference:** PDD 1135ha Calculation CCB Final, Nakauvadra Reforestation CCB PDD - April 2013 pg 78

**Finding:** The CCB Standards require that "The project proponents must provide a description of the project zone, containing all the following information:

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 (IPCC 2006 GL for AFOLU) or a more robust and detailed methodology."

Additionally, footnote 6 states "In cases where a published methodology is used, the full reference must be given and any variations from the published methodology must be explained."

AR-TOOL14 provides a root-shoot ratio of 0.25 for calculation below-ground biomass and states that this should be "used unless transparent and verifiable information can be provided to justify a different value." Given that the project is using an allometric equation rather than the root-shoot ratio provided by the methodology, please provide transparent and verifiable information to justify this value.

**Client Response:** The CCB standards do not require that project proponents utilise the most current methodology and tools, as long as they can demonstrate that the methodology and tools used generate net positive impacts. The most current CDM tool was released at the end of Nov 2012. By then, the climate calculations for the PDD had already been completed using what was at the time the most current and conservative version of the CDM tool (02.1.0). The allometric equation used in this instance for the root-to-shoot ratio is one that is given in the tool for use in the absence of species-specific data. Reference: Cairns, M. A., Brown, S., Helmer, E. H., & Baumgardner, G. A. (1997). Root biomass allocation in the world's upland forests. *Oecologia*, 111(1), 1-11. In fact, this allometric equation results in a more conservative estimate of below ground biomass than the 0.25 root-shoot ration prescribed in AR-Tool 14. Given the above, and the fact that the project is not generating carbon credits, but has demonstrated it is generating net positive climate benefits, the decision was made not to redo the GHG accounting section at this advanced stage of PDD development.

**Auditor Response:** An email from Gareth Wishart of the CCBA sent on 24 July 2013 confirms the appropriateness of the client's response. The information provided is sufficient to close this finding.

**NIR 2013.15 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section G1.6

**Document Reference:** Nakauvadra Reforestation CCB PDD - April 2013 pg 15-17

**Finding:** The CCB Standards require that "The project proponents must provide a description of the project zone, containing all the following information:

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."

Whereas, it was made clear during the site visit that no ongoing or unresolved conflicts or disputes exist in the project zone, this is not made clear in the PDD. Please update the PDD to include a description of such.

**Client Response:** The PDD has been updated to confirm there are no existing or unresolved conflicts. This has been confirmed through conversations and provision of a written letter provided by the Provincial Administrator of Ra. Attachment: Ra\_Prov\_no conflict letter

**Auditor Response:** The letter from the Provincial Administrator of Ra and the information added in the PDD is sufficient to close this finding.

**NIR 2013.16 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section G1.8.1 b, Appendix B

**Document Reference:** Nakauvadra Reforestation CCB PDD - April 2013 pg 24

**Finding:** The CCB Standards require that "The project proponents must provide a description of the project zone, containing all the following information:

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

b. threatened species."

Additionally, Footnote 14 defines threatened species as follows: "Species that qualify for the IUCN Red List threat categories of Critically Endangered (CR), Endangered (EN) and Vulnerable (VU). (See [www.iucnredlist.org](http://www.iucnredlist.org) and Appendix B: Glossary for more information.) Additional national or regional listings should also be used where these may differ from the IUCN Red List."

Finally, the definition of threatened species in Appendix B provides instructions for species that have not been evaluated by the IUCN, stating "Additional national or regional listings should also be used where these may differ from the IUCN Red List."

Please explain how the species in Section G1.8.1.b and Table 3 meet the definition of threatened species.

**Client Response:** Table 3 has been updated. Species which had a missing threat status against their name have been removed. These are species that were listed on the 2008 CITES Appendices when the RAP was carried out but as of 2012 are no longer listed.

**Auditor Response:** The removal of the species without threatened species status is in line with the definition of threatened species in Footnote 14. However, the species deemed "Near Threatened" (NT) and "Least Concern" (LC) are still included and do not meet the cited definition. At this time, *Podocarpus affinis* is now considered NT and *Gallicolumba stairii* is not listed. Please revise the table to meet the requirements of this criterion.

**Client Response 2:** The table in the PDD has been revised and species listed as NT and LC have been removed.

**Auditor Response 2:** The information provided is sufficient to close this finding.

**NIR 2013.17 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section G2.3, CL 2.4

**Document Reference:** Nakauvadra Reforestation CCB PDD - April 2013 pg 31-36

**Finding:** The CCB Standards require that "The project proponents must develop a defensible and well-documented 'without-project' reference scenario that must:

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...."

In the PDD and during the site visit, the audit team was informed that the net change in the emissions of non-CO2 GHG emissions such as CH4 and N2O were "negligible." Please provide evidence of how this determination was concluded, including the actual quantitative net change in the emissions of non-CO2 GHG emissions such as CH4 and N2O.

**Client Response:** Under the reference scenario, the grasslands would experience regular burning as a result of untended fires caused by pig hunting and nearby sugarcane harvesting. As the lands are currently vacant/abandoned, there is no use of fertilizers in these areas. The project has been conservative by not including the avoidance of these emissions in the with-project GHG accounting. However, an estimate of the potential non-CO2 gases (CH4 in the case of fire) has been made which demonstrates that the emissions from burning of 1,135ha would be 1, 393tCO2 which would equate to just 0.49% of the project's overall GHG impact. File attachment: Fiji CH4 fire calculation

**Auditor Response:** The information provided is sufficient to close this finding.

**NIR 2013.18 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section G3.2

**Document Reference:** Nakauvadra Reforestation CCB PDD - April 2013 pg 38-44

**Finding:** Please describe the expected climate, community, and biodiversity impact of each project activity as well as its relevance to achieving the project's objectives.

During the site visit, it was noted that more documentation would be necessary to further discuss the design of the reforestation plots including aspects related to rotation length, siting, silvicultural prescriptions, harvesting, and feasibility. Please also include all of the livelihood activities to be undertaken during the project lifetime.

**Client Response:** Further details describing the plan for reforestation feasibility and harvesting have been added to the PDD, as have the inclusion of all livelihood activities (p39-46). In addition, a step by step guide and flow diagram describing the establishment and implementation of the reforestation process has been inserted into the Operations, Health & Safety manual to serve as a reference for staff and community workers. The copy of the contents page of the Fiji Code of Harvesting and the training courses offered by the Forestry Training Centre has been provided to show evidence of the guidance materials that will be followed to develop the harvesting plans for the non native species, and the training that will be available for communities to take part in. The soft copy of the manual is available on site in the CI Fiji office. Attachment: Codeofharvesting\_contents pages.pdf

**Auditor Response:** The information added to the PDD and to the Operations, Health and Safety manual address issues raised by this finding and are sufficient to close this finding.

**NIR 2013.19 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section G3.4

**Document Reference:** Nakauvadra Reforestation CCB PDD - April 2013 pg 49-50

**Finding:** The CCB Standards require that "The project proponents must:

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."

During the site visit, it was noted that the implementation schedule, key dates and milestones in the PDD and in Table 12 of the PDD were incomplete. Please update this information to include the key dates and milestones in the project's development for all proposed activities, including those related to the reforestation plots as well as the livelihoods diversification component.

**Client Response:** The implementation schedule has been updated and inserted into the PDD. A description of the teak harvesting and sandalwood livelihoods activities have been added into the narrative of key project activities on p44-46. An excel copy of the Operating Plan has also been included as an attachment.

**Auditor Response:** The information provided is sufficient to close this finding.

**NIR 2013.20 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section G3.5

**Document Reference:** Nakauvadra Reforestation CCB PDD - April 2013 pg 52-54

**Finding:** The CCB Standards require that "The project proponents must:

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."

Interviews with community members during the site visit revealed that there is concern among some of the stakeholders in the project zone that they do not feel comfortable that they will be able to carry on the project activities, as proposed in Phase 3. Please update the PDD to include this concern as a likely human-induced risk to the expected climate, community and biodiversity benefits during the project lifetime and outline measures adopted to mitigate this risk.

In addition, another risk to the project is the lack of understanding of the community agreements. During the site visit, several communities did not understand the terms of the agreement, including which species to be harvested, when they are to be harvested, what are carbon credits, and how carbon credits are to be sold. Please update the PDD to include how this risk will be mitigated.

**Client Response:** A mitigation plan to address the risk that a) communities feel unable to carry out the livelihoods activities by themselves, and b) do not have a clear understanding of the terms of the CAs has been included in the PDD (p56).

In addition, an informational leaflet which summarizes the CA in Fijian has been included as an appendix to the Operations, Health & Safety manual. This will also be distributed to all mataqali in addition to the signed copies of the Agreements which are in English to serve as an additional reference material.

**Auditor Response:** The mitigation plan as well as the additional information added to the Operations, Health and Safety manual address issues raised by this finding and are sufficient to close this finding.



**NCR 2013.21 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section G3.8

**Document Reference:** Nakauvadra Reforestation CCB PDD - April 2013 pg 56-57

**Finding:** The CCB Standards require that "The project proponents must:

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."

Additionally, Footnote 26 states that "Effective consultation requires project proponents to inform and engage broadly with all community groups and other stakeholders using socially and culturally appropriate methods. Consultations must be gender and inter-generationally inclusive and must be conducted at mutually agreed locations and through representatives who are designated by the communities themselves in accordance with their own procedures."

During the site visit, it was brought to the attention of the audit team that women in many of the communities commented that they were not invited to participate in project meetings or were not taken seriously when they provided feedback to the project proponent. While the audit team understands that the project proponent conducted community consultation using socially and culturally appropriate methods in accordance with the community's procedures, this indicator of the standard requires gender inclusivity. Please provide evidence of how the project design and implementation complies with the requirements of this indicator.

**Client Response:** The iTaukei governance system has clearly defined governing mechanisms and processes as described in the iTaukei Affairs Act Cap 120. The project acknowledges this and our entry point to the villages is therefore always through the Ra Provincial Office and the Ra Provincial Administrator. The Ra Provincial Office has delegated an officer to be the key contact person for the project. When the Project calls for a community meeting, we liaise with the villagers through the contact person designated by the Provincial Office specifying our target groups for inclusion in the meetings, these always being the Chiefs, the Heads of each clan, women and youth groups. Participation of women at the Land Use Planning workshops and other village meetings are evidenced by photographs and signed participation lists.

To show the process that has been followed to date to ensure the incorporation of women in the project design and development stages, a gender action plan has been added to the Operations, Health and Safety Manual (p10). In addition to describing what has taken place to date, this plan will also serve as the guidelines for future work as the project continues along the implementation pathway.

In addition, CI has established women-specific livelihood activities as part of the project. These activities were developed following feedback received from women themselves during focus group discussions with CI. These activities include the establishment of small lots of pandanus plants in response to the concerns raised by the women to increase the supply of pandanus leaves for weaving mats. In other communities the project has set up bee hives and fish ponds that are maintained and managed by women's groups in the village. The project therefore recognises and respects the social structures

present in each community, but works to achieve the best interest of women within these traditional structures.

More generally, CI also has in-house policies on the incorporation of gender into the design and implementation of the organisation's conservation work. These are principles that CI has committed to adhering to across all its field programmes. A copy of the policy guidelines is included as an Attachment: policy\_statement\_RBA\_gender\_final.pdf

**Auditor Response:** The response provided as well as the addition of the Gender Action Plan to the Operations, Health and Safety manual are in line with the requirements of Footnote 16 to effectively consult in a gender and intergenerationally inclusive manner while using socially and culturally appropriate methods. The latter addition further demonstrates the strong leadership and adaptive management approach of the Project Proponent. The information provided is sufficient to close this finding.

**NCR 2013.22 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section G3.10

**Document Reference:** Nakauvadra Reforestation CCB PDD - April 2013 pg 61-62

**Finding:** The CCB Standards require that "The project proponents must:

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."

In the PDD and confirmed during the site visit, the audit team observed that grievances are responded to verbally. Whereas, this type of a response may resolve grievances that are raised, it is not in conformance with the requirements of this indicator. Please provide evidence that a plan is in place to provide written responses to grievances within 30 days and that these responses will be documented.

**Client Response:** The Grievance Manual has been updated to include provision of a written response to grievances within 30 days (p5). A copy of the internal CI template to track and respond to grievances has also been included to show that procedures are in place to document responses (Appendix 1 of the manual)

**Auditor Response:** The information provided is sufficient to close this finding.

**NIR 2013.23 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section G4.2

**Document Reference:** Nakauvadra Reforestation CCB PDD - April 2013 pg 64

**Finding:** The CCB Standards require that "The project proponents must:

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 proponents must either demonstrate how other organizations will be partnered with to support the project or have a recruitment strategy to fill the gaps."

The PDD states that "the Department of Forests is a key partner to the project, and provides technical advice and assistance in forestry related activities." During the site visit, however, interviews with the Department of Forests revealed a lack of knowledge of project activities, including limited engagement in the design and implementation of the project that would require their technical skills. During the audit, it was discussed how the CI Fiji project team possess the technical skills to fill this role. Please update the PDD to demonstrate the technical skills required to successfully implement the reforestation component of the project.

**Client Response:** The technical expertise of the CI team to carry out the reforestation components of the project has been detailed in the PDD (p70).

**Auditor Response:** The information provided is sufficient to close this finding.

**NCR 2013.24 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section G4.3

**Document Reference:** Nakauvadra Reforestation CCB PDD - April 2013 pg 65-69

**Finding:** The CCB Standards require that "The project proponents must:

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."

During the site visit, the audit team was unable to ascertain that a plan is in place as to how training will be passed on to new workers when there is staff turnover, so that local capacity will not be lost. Please provide evidence that such a plan is in place.

**Client Response:** A training plan for new local staff has been added to the Health & Safety Manual (now expanded to be the Operations, Health & Safety Manual). This includes a breakdown of the process, skills, training required and referenced resources to carry out the training for each different project role in the field. See p4, 18,19 of the manual. In summary: the CI Field Office retains and trains project staff on all aspects of work associated with the project. A number of field manuals are used as resource materials to support hands-on training for new field staff. The Field Project Officer is responsible for on-the-job training. The following training manuals support the training process: Nakauvadra Community Based Reforestation Project Operations Manual; What is a Watershed and Why Look after it?; How to build a simple, low cost community nursery; A Guide to Planting Local Tree Species for Forest Restoration; Vetiver: the Proven Soil Conservation Technique. Hard copies are kept in the CI Rakiraki field office. A scanned copy of the Planting Manual has been provided as an example of the type of resources materials that will be used to carry out the training of new staff and community workers. Attachments: Operations, Health & Safety Manual.doc, and Planting Manual.pdf

**Auditor Response:** The response, training manuals, and additions to the Operations, Health and Safety Manual are well-designed to afford the appropriate orientation and training for the project. As such, this information is sufficient to close this finding.

**NIR 2013.25 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section G4.6

**Document Reference:** Nakauvadra Reforestation CCB PDD - April 2013 pg 72

**Finding:** The CCB Standards require that "The project proponents must:

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."

During the site visit, interviews with community members revealed that some stakeholders were having issues with bees in the reforestation area. Moreover, the interviewees had not been informed of how to minimize the risks associated with bee keeping. Please provide evidence that a plan is in place to inform workers of all risks and to explain how to minimize such risks.

**Client Response:** Steps and suggested mitigation measures to address the risk of bee and wasp stings, both during beekeeping and reforestation activities has been included in the Operations, Health & Safety Manual (p 15-17). A copy of the manual is made available to workers prior to the start of project activities and also explained during the health and safety briefing.

**Auditor Response:** The information provided is sufficient to close this finding.

**NIR 2013.26 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section G5.6

**Document Reference:** Nakauvadra Reforestation CCB PDD - April 2013 pg 76

**Finding:** The CCB Standards require that "The project proponents must:

Demonstrate that the project proponents have 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 proponents 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."

Please indicate who owns the subsurface rights of the reforestation plots and demonstrate that the project proponent has clear, uncontested title to the carbon rights.

**Client Response:** As addressed in the response to the validation finding 2013.7, in Fiji the subsurface rights of all land, native or otherwise, belongs to the national government. The native landowners, however, have the full legal right to determine above ground land use in their lands, including having the right to plant trees or giving use rights to others to carry out the project on their behalf. In this case, CI has gained the full consent of the landowners to carry out the project via the signed Community Agreements, thus meeting the CCB requirements by demonstrating that the project is undertaken on behalf of the native landowners with their full consent. Following CCB guidance, CI as project proponent does not need nor is claiming title to the carbon rights. No carbon credits will be generated or transacted with this project, and any carbon rights will remain fully with each landowning unit. Through the CAs CI has gained the legal documentation required to demonstrate that the project is being carried out with the full consent of each landowner involved (currently the de facto owners of the carbon given there is no forest carbon rights legislation in Fiji and they are the owners of the land and the planted trees), thus meeting the CCB requirements.

**Auditor Response:** Community agreements have been designed to demonstrate that the project is undertaken on behalf of the carbon owners with their full consent. As such, the information provided is sufficient to close this finding.

**NIR 2013.27 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section CM3.1

**Document Reference:** Nakauvadra Reforestation CCB PDD - April 2013 pg 100-103

**Finding:** Please indicate who will be responsible for carrying out the community impact monitoring discussed in Section CM 3.1 of the PDD.

**Client Response:** CI will be responsible for carrying out the community monitoring, including the collection of data and elaboration of stakeholder interviews. The Ra Provincial Office will serve to assist in facilitating the community interviews according to traditional procedures. This has been included as clarification in the PDD.

**Auditor Response:** The information provided is sufficient to close this finding.

**NCR 2013.28 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section CM3.2

**Document Reference:** Nakauvadra Reforestation CCB PDD - April 2013 pg 103-104

**Finding:** The CCB Standards require that "The project proponents must:

"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."

Whereas the PDD provides an explanation for how the project will assess the effectiveness of measures to maintain the cultural and religious values associated with the Nakauvadra Range, There is no explanation for how the project will assess the effectiveness of measures to maintain the other High Conservation Values related to community well-being. Please update the PDD to include explanation for how the project will assess the effectiveness of measures to maintain ALL the High Conservation Values related to community well-being.

**Client Response:** To track the effectiveness of watershed values a baseline will be established by collecting data on the indicators described in table 21, starting in 2014. This will serve as an appropriate without-project baseline against which to measure change. Further detail has been added to the PDD to describe this.

**Auditor Response:** The information provided is sufficient to close this finding.

**NIR 2013.29 dated 07/11/2013**

**Standard Reference:** CCB Standards Second Edition, Section GL3.1

**Document Reference:** Nakauvadra Reforestation CCB PDD - April 2013 pg 114

**Finding:** The CCB Standards require that "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:

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."

While the information provided in the PDD is sufficient for most of the criteria of this indicator, it does not address the terms "regular occurrence." Please update the PDD to include the number of occurrences of the species listed in Table 25 of the PDD.

**Client Response:** The number of individuals recorded during the RAP survey for each of the 4 species has been added to Table 25 of the PDD.

**Auditor Response:** The information provided is sufficient to close this finding.

## 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:

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