RIMBA RAYA BIODIVERSITY RESERVE PROJECT VERIFICATION REPORT

Document Prepared By: Environmental Services, Inc.

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Report Title	Rimba Raya Biodiversity Reserve Project Verification Report
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Summary:

Environmental Services, Inc., (ESI) was contracted by InfiniteEARTH on 30 September 2014 to conduct the third monitoring period verification (01 July 2013 to 30 June 2014) of the *Rimba Raya Biodiversity Reserve Project* [Validated Project Description (PD) dated 15 May 2011]. The Rimba Raya project follows the framework of Reducing Emissions from Deforestation and Degradation (REDD) through Avoided Planned Deforestation (APD). The project is achieving GHG emission reductions through avoiding deforestation and consequent conversion to palm oil plantation.

The project was implemented in response to the on-going loss of national forest cover that has been brought about through clearing of forest areas with fire to open up land for agricultural use, especially palm oil plantations.

The Rimba Raya Biodiversity Reserve Project, an initiative by InfiniteEARTH, aims to reduce Indonesia's emissions by protecting 64,977 hectares, which encompasses tropical peat swamp forest from conversion to oil palm. This area, rich in biodiversity, especially of the endangered Bornean orangutan, was slated by the Provincial government to be converted into four palm oil estates. Located on the southern coast of Borneo in the province of Central Kalimantan, the project is also designed to protect the integrity of the adjacent world-renowned Tanjung Puting National Park, by creating a physical buffer zone on the full extent of the ~90km eastern border of the park. The previously validated PD entitled *Rimba Raya Biodiversity Reserve Project* dated 15 May 2011 describes the general principles of the project.

The Rimba Raya Carbon Accounting Area comprises 47,237 hectares of uninhabited lowland peat swamp forest located in Seruyan Hilir District; Danau Sembuluh; and Hanau, Seruyan Regency; in the province of Central Kalimantan, Indonesia. The Carbon Accounting Area defines the boundary for CO_2 emissions reductions accounting and lies within a 64,977-hectare Project Management Zone that will be protected and managed by the Project.

The project is monitored each year. Annual monitoring activities consist of remote sensing and GIS analysis, routine field patrols, and directed field sampling in areas prioritized by systematic site assessments. A key feature of the Rimba Raya monitoring plan is to employ spatial data and tools to systematically monitor land cover change, forest degradation and carbon pools in the project area and project buffer. This is combined with ground-based surveys to investigate and record information on any activities that affect project carbon stocks and peat emissions (e.g. fire, logging).

The monitoring period verification objective included an assessment of compliance with the validated PD, VCS Version 3, CCB Second Edition, and all associated updates, and the likelihood that implementation of the GHG project resulted in the GHG emission removal enhancements as stated by the project developer (ISO 14064-3:2006). The scope of the verification included the assessment of the VCS Monitoring & Implementation Report and the execution of the GHG project as stated in the validated PD for the 01 July 2013 to 30 June 2014 monitoring period (third period).

The monitoring period verification criteria followed the guidance documents provided by VCS and CCB and included the following: VCS Program Guide (v3.5, October 2013), VCS Standard (v3.4, October 2013), Program Definitions (v3.5, October 2013), Agriculture, Forestry and Other Land Use (AFOLU) Requirements (v3.4, October 2013), AFOLU Non-Permanence Risk Tool (v3.2, October 2012), the previously validated Project PD (dated 15 May 2011), VM0004, v1.0 – Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, CCBA Project Design Standards (Second Edition, December 2008), and Rules for the use of the Climate, Community, & Biodiversity Standards, Version December 2013.

A summary of all findings is included in Appendix A. There are no restrictions of uncertainty. ESI confirms all monitoring period verification activities, including objectives, scope and criteria, level of

assurance, monitoring and project documentation adherence to the VCS Version 3and CCB Second Edition, as documented in this report are complete. ESI concludes without any qualifications or limiting conditions that The *Rimba Raya Biodiversity Reserve Project* meets VCS Program v3 and CCB Second Edition requirements for the third monitoring period.

The GHG assertion provided by InfiniteEARTH and verified by ESI has resulted in the GHG emissions reduction or removal of 4,393,291 tCO_2 equivalents by the project during the verification period/reporting period (01 July 2013 to 30 June 2014). This value is net of Project emissions, leakage emissions and a withholding buffer (672,486 tCO_2 equivalents) based on the non-permanence risk assessment tool. The project is achieving the climate, community, and biodiversity benefits, including Gold Level Climate Change Adaptation, Exceptional Community, and Exceptional Biodiversity Benefits as described in the Monitoring & Implementation Report dated 10 August 2015.

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1 INTRODUCTION

1.1 Objective

InfiniteEARTH Limited (Project Proponent) has commissioned Environmental Services, Inc. (ESI) (Verifier) to conduct the verification of emissions reductions for the Rimba Raya Biodiversity Reserve Project reported for the Verified Carbon Standard, Version 3 under the REDD Methodology VM0004 v1.0 and the Climate, Community and Biodiversity Project Design Standards (Second Edition - December 2008) for the verification period 01 July 2013 to 30 June 2014. This project has undergone the third VCS monitoring period verification to ensure the project has been implemented and remains compliant with the *VCS Program Guide*, *VCS Standard*, *AFOLU Requirements*, Climate, Community and Biodiversity Project Design Standards (Second Edition - December 2008), and the validated Project Description (PD). The verifier assessed if the Project Proponent adequately addressed increases in project emissions, unplanned reductions in carbon stocks, and any possible leakage outside the project boundary.

1.2 Scope and Criteria

The scope of a verification included the review of the GHG project and implementation; physical infrastructure, activities, technologies and processes of the GHG project; GHG sources, sinks and/or reservoirs; types of GHG's; and time periods covered. The Rimba Raya project follows the framework of Reducing Emissions from Deforestation and Degradation (REDD) through Avoided Planned Deforestation (APD). The geographic verification scope is defined by the project boundary, the carbon reservoir types, management activities, growth and yield models, inventory program, and contract periods.

The scope of the project was outlined by the Project Proponent within the Validated Project Description dated 15 May 2011 and is re-defined as follows for the GHG project:

Baseline Scenario	The Rimba Raya Biodiversity Reserve Project, an initiative by InfiniteEARTH, aims to reduce Indonesia's emissions by preserving more than 47,237 hectares (carbon accounting area) of tropical peat swamp forest. This area, rich in biodiversity, including the endangered Bornean orangutan, was slated by the Provincial government and Ministry of Forestry to be converted into four palm oil estates.
Activities/Technologies/Processes	VM0004, v1.0 Conservation – avoided planned land use change in peat swamp forests
Sources/Sinks/Reservoirs	Peat soils Aboveground tree biomass Wood Products
GHG Type	CO_2, CH_4, and N_2O
Time Period (state date, crediting period, verification period)	VCS Third Monitoring/Verification Period: 01 July 2010 to 30 June 2013 (3 years)

Project Boundary	Rimba Raya Biodiversity Reserve Project - approximately 64,977 hectares; located in the Seruyan Regency, in the province of Central Kalimantan, Borneo. The Project lies between 112°01'12 "- 112°28'12" east longitude and 02°31'48"- 03°21'00" south latitude
Total net VCUs generated during Monitoring Period	4,393,291 CO_2e

1.3 Level of assurance

The assessment was conducted to provide *reasonable assurance* that conformance against the verification criteria was within the verification scope. Based on the verification findings, a final evaluation statement reasonably assures that the project GHG representations are materially accurate. Findings are determined by assessment of the project's implementation and monitoring aspects for errors, omissions, or misrepresentations (ISO 14064-3:2006).

1.4 Summary Description of the Project

The *Rimba Raya Biodiversity Reserve Project* was initiated by InfiniteEARTH Ltd to reduce emissions in Indonesia by conserving 64,977 hectares which encompasses large areas of tropical peat swamp forest. Deforestation and land conversion in Indonesia has substantially increased in recent years. The project area was planned for conversion into palm oil plantations by the Provincial government, which would degrade biodiversity and habitat for the endangered Bornean orangutan. Without the Rimba Raya Biodiversity Reserve Project, the project area would be subsequently converted to oil palm plantation from management activities, including logging, burning slash and remaining forest, and comprehensive drainage of the peatlands. The resulting release of millions of tons GHG emissions from above and belowground carbon sources over the lifetime of the project would contribute to local and global environmental concerns. The project is also intended to protect the biodiversity of adjacent Tanjung Puting National Park by creating a physical buffer along the eastern border of the park.

Economic incentives for preservation of the tropical peatland forests are created by InfiniteEARTH – the Project Proponent – using the sale of carbon credits that are generated by the Verified Carbon Standard (VCS). Carbon credits are validated through the Reducing Emissions from Deforestation and Degradation (REDD) and Avoided Planned Deforestation (APD) frameworks. The sustainable revenue stream from carbon credit sales supports local community development, provincial government infrastructure, and project area protection. Community involvement is enhanced through the development of programs to improve quality of life, such as water filtration devices, increased access to healthcare, and early childhood development. Therefore, the overall goal of the project is to demonstrate that protection of endangered peat swamps is advantageous to commercial institutions, social programs, and environmental objectives.

The Rimba Raya Carbon Accounting Area (CAA) consists of 47,237 hectares of lowland peat swamp forest located in Seruyan Hilir District, Danau Sembuluh and Hanau, Seruyan Regency, in the province of Central Kalimantan, Indonesia. The CAA defines the boundary for CO_2e emissions reductions accounting and lies within a 64,977-hectare Project Management Zone (PMZ) that will be protected and managed by the Project. The PMZ lies between 112°01'12"-112°28'12" east longitude and 02°31'48"- 03°21'00" south latitude and is bounded by Tanjung Puting National Park in the west, the Java Sea in the south, the Seruyan River in the east, and a palm oil concession in the north.

2 VALIDATION PROCESS, FINDINGS AND CONCLUSION

2.1 Validation Process

Not applicable.

2.2 Validation Findings

2.2.1 Gap Validation

Not applicable.

2.2.2 Methodology Deviations

Not applicable.

2.2.3 Project Description Deviations

Not applicable.

2.3 Validation Conclusion

Not applicable.

3 VERIFICATION PROCESS

3.1 Method and Criteria

A project specific Verification and Sampling Plan was developed to guide the verification auditing process to ensure efficiency and effectiveness. The purpose of the Verification and Sampling Plan is to present a risk assessment for determining the nature and extent of verification procedures necessary to ensure the risk of auditing error is reduced to a reasonable level.

According to the ISO14064-3, the verification criteria would be the “policy, procedure or requirement used as a reference against which evidence is compared”. Therefore, verification of the selected methodology (VM0004, v1.0) and reported project results were measured for compliance against the following criteria:

- VCS Program Guide (v3.5,08 October 2013)
- VCS Standard (v3.4, 08 October 2013)
- VCS Program Definitions (v3.5, 08 October 2013)

- VCS Agriculture, Forestry and Other Land Use (AFOLU) Requirements (v3.4, 08 October 2013)
- VCS AFOLU Non-Permanence Risk Tool (04 October 2012, v3.2)
- Project Design Standards (Second Edition, December 2008)
- Rules for the use of the Climate, Community, & Biodiversity Standards, Version June 21, 2010.

The verification methodology was derived from all items in the verification criteria stated above. Field sampling and techniques were based on the project parameters, scope, and best professional judgment of the verification team in order to meet a *reasonable* level of assurance. A risk-based approach was used for the field sampling effort to select key areas for review of carbon losses by direct measurement, observation, followed by ground-truthing of leakage issues and review of project activities. The desktop verification component included a full review of all project documentation/calculations received from the Project Proponent, including the VCS Third Monitoring & Implementation Report.

3.2 Document Review

A detailed review of all project documentation was conducted to ensure consistency with, and identify any deviation from, VCS program requirements, CCB program requirements, the methodology (VM0004, v1.0), and the validated PD. Initial review focused on the validated PD and Monitoring & Implementation Report (PIR) and included an examination of the project details, implementation status, data and parameters, and quantification of GHG emission reductions and removals. Documents reviewed included data from monitoring, carbon rights contracts, economic analysis, maps and aerial images, fire specific monitoring data, biomass and carbon calculation spread sheets, and responses to Non-conformance Requests (NCRs) and Clarification Requests (CLs).

The verification included a review of the validated PD and PIR, relative to the field conditions observed and interviews with project management staff. Modifications to the Verification and Sampling plan were made based upon the conditions observed for monitoring in order to detect the processes with highest risk of material discrepancy.

For a listing of all documents received from the client for this verification, please see Appendix A.

3.3 Interviews

During the course of the verification, personnel who were involved provided important information. Onsite interviews and informal discussions were conducted with project staff, members and leaders of the local communities, as well as Indonesian government representatives. The following is a list of the main interviewees:

Name	Information Discussed
Birute Galdikas Orangutan Foundation International	We visited each of the orangutan age groups the Orangutan Foundation International are taking care of. She discussed with us the pressures and concerns they have about deforestation

	and the plight of the orangutans. She told us about the history behind the project area, how important it is for her organization and for the survival of the orangutans. She described to us that the project has been a huge success even in the short time it has been operating due to the fact that it has kept the forest from being part of a concession and thus, being completely removed.
Jim Procanik InfiniteEARTH Ltd	General project specifics over the course of the site visit
Carly Green Environmental Accounting Services	General project specifics over the course of the site visit and project review.
Loy Jones PT Pandu Maha Wana Asia Pacific Consulting Solutions	General project specifics over the course of the site visit.
RRC Jakarta Office: Djonni Andhella M. Asari Nisa Jalil Petrus Suryadi Yudhita	Overview of Rimba Raya, association with the Ministry of Forestry, efforts toward producing Rimba Raya map and permanent marking of project area,
Rimba Raya Project Staff: James Simatupang Haryo Ajie Melita Ruchiyat Nahot Fernandez Ngariswara Effendi Yugo Septo Ameido Nasral Ichsan	General project specifics over the course of the site visit, travelled with the verification team. Insights into employment and opportunities the project provides.
Anthon Kesaulya WE Community Development Coordinator	Traveled with verification team, provided information on community development activities over the course of the site visit.
Pak Ismugiono	Representative from Indonesian Ministry of Forestry. Discussed boundary demarcation and ecosystem restoration (RE) and the contributions Rimba Raya has made to the advancement of RE.
Seruyan District Bupati-governor and local head official	Verifiers attended a formal meeting in Kuala Pembuang to discuss the project with the Bupati at his office headquarters. He stated the project can be a model for conservation in Seruyan District and a consideration for future generations. It was clear he felt the project has good significant benefits for the area.
Other Seruyan District	After the meeting in Kuala Pembuang, verifiers discussed the

Officials Andy (Ministry of Forestry) Agustiando (National Parks) Maryoso (Economics official) Priyo Widagdo (Fisheries) 2 Industry and trade officials, no names recorded.	relationship between the regional government and the project. A very close working relationship between government ministries and project management was described by each ministry representative.
Leader of Ulak Batu	Ulak Batu Described benefits to the project, and showed the auditors the production of craft items from some unrecyclable trash – one of the project activities providing an income opportunity for women, including women caring for young children.
Maura Dua Community meeting, included the official town leader and many residents of the town. Marto – Imam in Moura dua Blani Hamlet – Suharo (one of the nurseryman for Rimba Raya)	Maura Dua town meeting to discuss the project, and how it is affecting the community. There appeared to be overwhelming support of the project from all. The town leader was asked about project benefits and the comparison of those benefits to those provided by Palm Oil plantations. He said the project provides more important benefits than the palm oil plantations. The project provided some livestock, and fixed a municipal water system that fell into disrepair. The Imam of Maura Dua (Marto) stated the most important benefit provided by the project were the income opportunities provided to women. Nurseryman Suharo described his nursery business as an important seasonal supplement to income. He described economic life in the Moura Dua/Blani area.

3.4 Site Inspections

The verification site inspection followed the prepared Verification and Sampling Plan process and was conducted between 03-10 February 2015. A thorough ground inspection of the project area was conducted during the site visit. Verifiers visited several targeted areas within and surrounding the project area. Several trips into the project area by boat targeted burn areas and logging gaps. Communities were visited along the river, adjacent to the project area to gain a sense of the risks associated with the climate benefits from the project. A breach of the leakage belt that occurred during the second monitoring period at the northern boundary was visited to assess impacts and remediation implemented.

During the field review of the project, the following aspects of the project were assessed:

1. Boundary - Reviewed boundaries using GPS and checked on boundary signage.

2. Stratification - Checked vegetative cover classifications by taking waypoints and notes and/ or comparison to new vegetative cover classes through direct observation with handheld GPS and maps.
3. Forest Protection - Viewed incursions and mitigations in the Northern boundary and Southern zone where applicable.
4. Reviewed and observed carbon losses in high risk areas:
    - Hot-spot areas of recent deforestation and degradation in project boundary, leakage area and carbon accounting area with confirmation of data collection methods in conformance with the stated SOP's for monitoring.
    - These sites and activities included:
        - Evidence of logging (degradation and deforestation)
            - GPS tracks of logging trail or logging canal
            - GPS coordinates of each logging event
            - Examination of evidence of recent and/or past logging.
            - Examination of tree species removed and material removed and left behind by loggers.
            - DBH of stump
            - Length of bole removed
            - Total height of tree removed
            - Species
            - Landcover conditions including clearing, degradation, drainage, etc.
            - Compared reports to on site conditions
        - Evidence of Fire Hot Spots
            - Ground-truthing of burn areas
            - Area burned
            - GPS coordinates for sample burn spots
            - Depth of peat burns for intensive burns
            - Landcover conditions including clearing, degradation, drainage, etc.
        - Peat damage
            - Average depth of peat drainage
            - Area impacted
        - Evidence of Land Clearing
            - Area of land impacted
            - GPS coordinates for land clearing in leakage area
            - Types of activity
            - Landcover conditions including clearing, degradation, drainage, etc.
    - Leakage
        - Reviewed leakage monitoring as described in the validated PD and Monitoring Report.
        - Reviewed the status of new permits allotted to the agent of deforestation “PT BEST Agro International Group” through discussion with member of Parliament.- Review possibility of illegal expansion of other concessions. We visited a couple of the areas deemed to be leakage and found them to be relevant. One site was determined to have been conducted by the local community and was taken out of the carbon accounting for leakage.

Direct field observations and CCB questionnaires were performed throughout the site inspection in order to sufficiently satisfy the professional discretion of the Verification Team.

3.5 Public Comments

The project PIR was posted to the CCBA website for the formal 30-day public comment period 09 January 2015 – 08 February 2015. No formal comments were received.

3.6 Resolution of Any Material Discrepancy

During the verification process, there was a risk that potential errors, omissions, and misrepresentations would be found. The actions taken when errors, omissions, and misrepresentations were found included: notifying the client of the issues identified, and expanding our review to the extent that satisfied the Lead Verifier's professional judgment.

During the course of the verification, 39 Non-Conformity Reports (NCRs) and Clarifications (CLs) were identified. All NCRs/CLs were satisfactorily addressed. The NCRs/CLs provided necessary clarity to ensure the project was in compliance with the requirements of the VCS Standard (v3) for GHG projects. For a complete list of all NCRs/CLs and their resolutions, please refer to Appendix B.

VERIFICATION FINDINGS

4 GENERAL

4.1 Summary Description of the Project (G3)

Please see Section 1.4 of this report for a summary description of the *Rimba Raya Biodiversity Reserve Project*.

The project seeks to reduce emissions in Indonesia by conserving 64,977 hectares encompassing tropical peat swamp forest. Deforestation and land conversion in Indonesia has substantially increased in recent years. The project area was planned for conversion into palm oil plantations by the Provincial government, which would degrade biodiversity and habitat for the endangered Bornean orangutan. Without the *Rimba Raya Biodiversity Reserve Project*, the project area would be subsequently converted to oil palm plantation from management activities, including logging, burning slash and remaining forest, and comprehensive drainage of the peatlands. The resulting release of millions of tons GHG emissions from above and belowground carbon sources over the lifetime of the project would contribute to local and global environmental concerns.

4.2 Project Location (G1 & G3)

"The Rimba Raya Carbon Accounting Area comprises 47,237 hectares of uninhabited lowland peat swamp forest located in Seruyan Hilir District, Danau Sembuluh and Hanau, Seruyan Regency, in the province of Central Kalimantan, Indonesia."[1]

[1] *Rimba Raya Biodiversity Reserve Project (Project Description), dated 15 May 2011.*

The project proponent provided the verifiers a list of coordinates (decimal degrees) and satellite images to identify/locate the location of the project areas. As required by VCS, a kmz file has been provided that defines the extent of the geographic area of the project, and this is shown in the PD. Copies of the User Rights Agreements and the Working Area Map for each parcel were provided to the verifiers, establishing ownership. The site visit also confirmed location of the Carbon Accounting Area. Maps depicting the project zone, based on distance from project area boundaries, are provided. General, verifiable information regarding local soils, climate and geology was provided and confirmed by the verifiers. Project boundaries and locations were confirmed to a reasonable level of assurance for all properties.

4.3 Conditions Prior to Project Initiation (G1)

The verifiers confirmed that there are no conflicts or legal disputes over the ownership or the right of use within the project areas. Land titles for the parcels within the project area were provided to the verifiers and a summary is provided in the PIR.

Remote sensing imagery and the site visit revealed that the original vegetation described in the validated PDD is largely unchanged, except for the incursion by the agent of deforestation on the northern boundary of the project area, which was observed during the previous monitoring period.

The description of the communities was as described in the original project validation and during the previous monitoring period is mostly unchanged, except that the project itself may have brought the average income of communities above the national poverty line since the end of this monitoring period. Land tenure/land rights are unchanged. Biodiversity is largely unchanged, since it depends on keeping the project area intact and undisturbed; the same is true for community-related HCVs.

4.4 Project Proponent (G4)

Project Proponent	Point of Contact	Roles/ Responsibility	Contact Details
Infinite Earth	Todd Lemons	Founder	36/F, Tower Two, Times Square, 1 Matheson Street, Causeway Bay, Hong Kong contact@infinite-earth.com

The roles and responsibilities of the project proponent and the science and monitoring team are listed in section 1.4 of the PIR. Based on verification activities, it is clear that the project proponent is capable and possesses the skills required to conduct the project activities, and is capable of overseeing project activities conducted by others.

In addition to the Mr. Todd Lemons, Mr. Jim Procanik of Infinite Earth fills the roles required to handle the project activities that were identified in section 1.4 of the PIR. The skills listed have been verified, and it is clear that Infinite Earth personnel possess these skills.

4.5 Other Entities Involved in the Project (G4)

In addition to the project proponents, other groups are involved in the project. Environmental Accounting Services (EAS) is involved in VCS/CCB verification support services. They have

acted as the main contact point during the verification. Asia Pacific Consulting Solutions is playing an operative role in the project. Asia Pacific Consulting Solutions is responsible for the staffing, supervision and implementation of all programs for the Rimba Raya project in Central Kalimantan. Other qualified groups involved in project implementation have their contact info below:

Other Entities	Point of contact	Roles/ Responsibility	Contact Details
PT Pandu Maha Wana Asia Pacific Consulting Solutions	Loy Jones	Managing Director	Jl. Veteran, Gg Jempinis No.17, Banjar Uma Kepuh, Desa Buduk. Mengwi, Badung 80351 Bali - Indonesia
Orangutan Foundation International (OFI)	Dr. Biruté Galdikas	President	Jalan Hasanuddin No. 10 Blk DKD Pangkalan Bun Kalimantan Tengah 74111 Indonesia
World Education (WE)	Edy Hartono	Representative	World Education Jalan Tebet Dalam IV-D Number 5A Jakarta 12810 Indonesia
Environmental Accounting Services (EAS)	Dr. Carly Green	Principal Consultant	3 Sim Jue Court, Sinnamon Park, 4073, Australia
Remote Sensing Solutions (RSS)	Peter Navratil	Geographer and Remote Sensing Specialist	Isarstr. 3 82065 Baierbrunn, Munich Germany

The PIR lists the following skills required for this project:

- International project development experience
- Forestry
- Remote Sensing, GIS
- Finance and marketing
- Forest monitoring & Field measurements
- Community outreach/education

Sections 1.3 and 1.4 of the PIR fully explain the skills and responsibilities of each of the entities involved in the project. The track record of these entities and individuals demonstrate that they have the skills described.

4.6 Project Start Date (G3)

The project start date is 01 July 2009. As stated in the PD, "Date on which a financial commitment was made to the project and project reached financial closure." [2] This date represents a change in management decisions for parcels under-going changes in Rights of Use, as such, the date on which activities that lead to the generation of GHG emission reductions or removals were implemented.

Confirmation of the project start date occurred during validation.

4.7 Project Crediting Period (G3)

The Project Start Date is July 1st, 2009. The project crediting period (GHG accounting period) started on July 1st, 2009 and will end on June 30th, 2038. The Project has a lifetime of 30 years.

There is no discrepancy between the project lifetime and the project crediting period.

[2] Ibid.

5 IMPLEMENTATION OF DESIGN

5.1 Description of the Project Activity (G3)

The project activities and Monitoring Plan, as described in the validated PD, have been fully initiated. There are no remaining issues from the validation. As this is the third verification, most activities have been implemented, and the Verifiers observed much progress during the Verification Site Inspection compared to the second verification.

The Verifiers requested to visit examples of all activities during the various Site Inspections and subsequently confirmed the initial implementation of all items related to climate, community, and biodiversity.

Climate objectives are avoiding the 130 million tonnes of CO2e that would have been emitted in the 'without project' scenario, and to pose as a physical barrier between oil palm plantations and Tanjung Puting National Park, to protect the hydrological integrity of the park and avoid emissions from drained peat swamp.

Biodiversity objectives are to expand the contiguous habitat of the national park all the way to the Seruyan River, to the east of the park, providing a physical boundary, and supporting the work of Orangutan Foundation International and Dr. Birute Galdikas with project activities aimed at extending the organization's conservation, rehabilitation and environmental education programs.
Community objectives are to engage with the communities in the project zone to improve access to healthcare, education and governmental services, and to ensure food security, access to employment and capacity building opportunities.

Project activities described in the PIR include:

1. The primary project activity, establishing the Rimba Raya Reserve, achieves most biodiversity goals.
2. Hiring of local guards/field crews is providing income opportunities in local communities, however few people were hired during this crediting period. A significant number of people were hired for guarding/patrol and fire brigades between the end of the crediting period and the site visit.
3. Fire response system – not in place during crediting period, but people hired and training commenced since then.
4. Monitoring plan – biodiversity impacts obvious.
5. Replanting/enrichment – about 160,000 seedlings were planted in formerly forested areas in the project area (not for C accounting purposes), providing income to local community members, including large numbers of women. Extensive replanting operations were being conducted during the site visit.
6. Cash crop agroforestry activities – nurseries established, plantings begun. Provides income, food sources for communities.
7. OFI funding – biodiversity clearly benefits.
8. Co-management of TPNP – still in planning stage, this activity will provide needed resources to the underfunded park, benefiting biodiversity and communities through employment opportunities.

9. Social buffer – the goal is to surround the project with communities in favour of the project, who understand and buy into the project and its goals. A key to this is economic development. While limited activity took place in this regard during the crediting period, education, hiring and training in regard to the project and project supported activities was clearly in evidence during the site visit.
10. Community centers – stimulus fund established, some centers built. Multiple positive impacts for communities and biodiversity.
11. Agricultural training is in progress – community impacts clear, potential biodiversity impacts are obvious.
12. Clean water systems – ceramic water filter devices were distributed and were in use during the monitoring period. Subsequent inquiries revealed some towns had pre-existing water systems, which have now be repaired and a system put in place to provide maintenance.
13. Fuel efficient stoves – so far, pilot programs for efficient stoves have met limited success, but efforts are continuing to provide stoves desired by community members.
14. Biochar – no activity commenced thus far.
15. Small scale solar lighting – in planning stages.
16. Micro-credit – no activity commenced thus far.
17. Sustainable healthcare – no activity commenced thus far.
18. Floating clinic – in early planning stage.
19. Capacity building programs – some capacity building related to agricultural education and other general subject areas for high school and middle school students is underway in Telaga Pulang. Classes observed and students interviewed during site visit.

The Project Proponents' efforts were dominated by the establishment and protection of project boundaries during the monitoring period, but the establishment and protection of the project area is key to most biodiversity goals and many community goals. Some community related activities commenced during the monitoring period (agricultural education in particular), but in the months between the end of the monitoring period and the site visit, many project activities were initiated and are in operation today.

The goals of the project activities, providing income, increasing forest cover and crop diversity, are clearly and directly related to increasing the well-being of the local communities.

5.2 Management of Risks to Project Benefits (G3)

The PIR describes the natural and human-induced risks to be continued pressure from oil palm expansion at the northern boundary, and from fires lit by bordering communities for agricultural or other purposes. The project is expanding patrols, establishing fire towers and plan to install permanent guard posts. The PIR refers to eventually permanently marking project boundaries. This was completed around the time of the site visit, with concrete posts spaced around the concession perimeter.

The PIR also states the project will continue to seek ways to expand the income of local community members, reducing pressure on the project area lands. The site visit confirms that the project remains under pressure from an oil palm plantation seeking to expand at its northern

boundary, but that the line is being held in a contested area near Ulak Batu. Burning pressures from surrounding communities also appear to be risks.

Since the end of the monitoring period, many of the fire/monitoring teams have been hired from local communities. Many temporary tree planters and seedling growers have derived income through the project. In one town, an independent recycling business was developed under project guidance, employing several people, and providing banking services to collectors of recyclable materials.

It is clear that the Project Proponents have taken strong steps to reduce the most pressing risks.

5.3 Measures to Maintain High Conservation Values (G3)

The PIR explains that the HCVs identified for the project area are dependent upon the area remaining undrained and undeveloped. The main project activity and project goal – protection and enhancement of the project area – enhance the HCVs. Measures to maintain HCVs are listed appropriately in the PIR and details of risk management for HCVs are described above in Section 5.2.

5.4 Project Financing (G3 & G4)

The PIR states that the Project Proponents have had carbon revenues since 2013 through several sales and that sufficient funds are available to conduct the project. A detailed financial analysis was provided as evidence to support the assertion of adequate funds and a sufficient cash flow to continue project activities through the next year, even with the current low price of voluntary carbon offset credits.

5.5 Employment Opportunities and Worker Safety (G4)

The PIR describes the process used to hire the fire crews/deforestation monitors. Position announcements were distributed one month before hiring and interviews were conducted. During the site visit, position announcements were seen posted on a community bulletin board in Maura Dua. The PIR states that no women applied for the positions, but that is largely due to the hard labor involved in firefighting.

Community development staff will be hired from each village, and efforts will be made to attract female workers.

It should be noted that while no full-time community based female employees yet work for the project, many women are employed on a part-time basis for replanting activities, at wages generally higher than those available for low skilled jobs in Sampit. Also, Jakarta and Sampit staff includes three women, one of whom was recently promoted from administrative assistant to Infinite Earth Photographer and a stakeholder relations position (Melita Ruchiyat).

Worker safety training has been informal, with discussions with new employees upon hiring. SOPs are in development for formalized safety training. Personal protective equipment and first aid kits are in each permanent field office.

The PIR lists the following applicable laws regarding employment:

- UU No. 13/2003
- C81 – Labour Inspection Convention, 1947
- C87 – Freedom of Association and Protection of the Right to Organise Convention, 1948
- C98 – Right to Organise and Collective Bargaining Convention, 1949
- C100 – Equal Remuneration Convention, 1951
- C102 – Social Security (Minimum Standards) Convention, 1952
- C105 – Abolition of Forced Labour Convention, 1957
- C111 – Discrimination (Employment and Occupation) Convention, 1958
- C138 – Minimum Age Convention, 1973
- C169 – Indigenous and Tribal Peoples Convention, 1989
- C182 – Worst Forms of Child Labour Convention, 1999

The PIR goes on to say that the project will exceed all labor requirements and ensure all are told of their rights. It states all employees sign an employment agreement and are provided a copy of company regulations and are apprised of their rights.

5.6 Stakeholders (G3)

The PIR states that a summary of this monitoring report was distributed in the project zone in all villages and sub-district seats. Notices were also placed on village bulletin boards and distributed by world education.

During the site visit, messages regarding the scheduling of the auditor site visit and contact information for the auditing team and for filing comments with VCS/CCB were seen on community bulletin boards, in the local language.

Formal and informal meetings with public officials and community members revealed regular contact between stakeholders and project management, and regular updates. Communications between project management and the community was described as intense by several parties.

The auditors found that regular, nearly constant communications exist between the project and community members, traditional and official leaders, and other stakeholders. Managers are stationed in villages in the project zone, with locally hired staff. Regional government officials are in regular contact with management. The Jakarta staff is in daily contact with relevant national government officials, as their offices are within the Ministry of Forestry offices. Communications between the project and stakeholders is effective and nearly constant in many ways.

Conflict resolution process remains the same from the previous verification. World Education will serve as the third party mediator, should that become necessary.

6 LEGAL STATUS

6.1 Compliance with Laws, Statues, Property Rights and Other Regulatory Frameworks (G4 & G5)

The national and local laws listed all pertain to labor. (see Section 5.5 above). In Indonesia, the government owns all land and grants rights of use.

The PIR states all laws will be followed or exceeded. Employees will be informed of their rights upon hiring. Indonesia is not a party to any emissions limiting treaties or regulations.

The PIR provides a map of the project area and a Table showing the agreements securing rights to the Project Proponents.

During the site visit, final documentation showing the location of permanent concrete markers, spaced every 100 meters, depicting the project area boundaries (but not the carbon accounting area, which is smaller) was in the process of being signed by the various levels of government in Indonesia. Visits with both traditional community leaders and officials of the Indonesian government indicated the Project Proponents had approval from all levels of government and leadership, from the Bupati to local elected leaders, traditional leaders and religious leaders.

6.2 Evidence of Right of Use (G5)

The PIR provides a map of the project area and a Table showing the agreements securing rights to the Project Proponents.

During the site visit, final documentation showing the location of permanent concrete markers, spaced every 100 meters, depicting the project area boundaries (but not the carbon accounting area, which is smaller) was in the process of being signed by the various levels of government in Indonesia. Subjects of interviews during the site visit with government officials left the auditors with no question that the Project Proponents possess the carbon and land use rights to the project area. Several government meetings revolved around signing the map depicting the concrete marker boundaries of the project area.

Documents granting the Project Proponents the rights to the timber and ecosystem of the Rimba Raya lands to PT. Rimba Raya were provided, as well as agreements with the national park and the agent of deforestation. These documents were reviewed and sufficiently show the Project Proponents rights to the carbon resource.

6.3 Emissions Trading Programs and Other Binding Limits (CL1)

No emission reductions generated by the project are part of an emissions trading program. Further, Indonesia has no binding limits on GHG emissions nor does it operate an internal emissions trading scheme.

6.4 Participation under Other GHG Programs (CL1)

The project has not been registered, and is not seeking registration, under any other GHG programs.

6.5 Other Forms of Environmental Credit (CL1)

Not applicable. The project has not created wetland mitigation, water quality, air pollution, other non-VCS GHG emission reduction, or any other form of environmental credit.

6.6 Projects Rejected by Other GHG Programs (CL1)

The project has neither applied to receive credits from, nor has it been rejected by any other GHG program.

6.7 Respect for Rights and No Involuntary Relocation (G5)

As confirmed during the verification process, the Indonesian Government owns the project area and communities live directly adjacent the project area. The project will not involve the relocation of people or activities but instead seeks to inform through education and outreach. Please see Section 6.2 of this report for further detail.

6.8 Illegal Activities and Project Benefits (G5)

The illegal activities that may be conducted within the project area include illegal logging and drainage by oil palm companies. Neither of these activities could benefit the project, and could potentially reduce carbon offset credits.

Monitoring will be used to reduce both illegal activities. Monitoring by OFI has been shown to reduce incursions and natural threats. Illegal activity will clearly not benefit the project and its goals. Monitoring on the northern boundary of the project has already detected and stopped illegal logging and draining within project boundaries.

7 APPLICATION OF METHODOLOGY

7.1 Project Description Deviations

Not applicable.

7.2 Baseline Scenario (G2)

The most likely land use scenario in the absence of the project is drainage and use for oil palm production. The land was slated for such use before the concession expired and a brief opportunity became available to change the designated land use. Other lands granted to the oil palm company have been full developed and planted to oil palm. The same company continues to try to expand into the Rimba Raya concession to this day.

Communities would likely be affected in the same way communities that are now surrounded by oil palm plantations are currently being affected. Those communities face conflict over land use rights, encroachment by the oil palm companies without agreement with communities, communities complain of being treated unfairly and being unjustly compensated for lands taken. This situation is unlikely to change without some upheaval.

Ecosystem services would likely decline with the instalment of artificial drainage and a monoculture forest that requires heavy chemical input.

Observations made during the site visit, interviews with local stakeholders, including OFI founder, Dr. Galdikas and other evidence substantiate the fact that the project area would now be part of a oil palm plantation in the absence of the project.

7.3 Additionality (G2)

The without project scenario would remove most, if not all of the ecosystem services provided by the land, including biodiversity and protection of endangered species, as well as water filtration and flood control services that an intact peatland would provide. These benefits would no longer be available, because they depend on the ecosystem remaining intact, which would not happen in the without project scenario.

The landscape would have been altered, the forest replaced and hydrological services disrupted in the absence of the project, guaranteeing ecosystem benefits would cease or be severely depleted. Other project benefits derived from carbon offset sales would obviously not occur, either.

8 QUANTIFICATON OF GHG EMISSION REDUCTIONS AND REMOVALS

8.1 Accuracy of GHG Emission Reduction or Removal Calculations (G2)

ESI conducted an intensive review of all input data, parameters, formulas, calculations, conversions, statistics and resulting uncertainties and output data to ensure consistency with the VCS and CCB standards, the validated project PD and the methodology. Further, ESI reproduced calculations for selected samples to ensure accuracy of the results. Samples of data with associated conversion factors, formulas, and calculations were provided by the project proponent in spreadsheet format to ensure all formulas were accessible for review. The verifier recalculated subsets of the analysis to confirm correctness. The Project Proponent also provided a step-by-step overview of calculations to ensure ESI understood the approach and could confirm its consistency with the methodology and PD.

ESI also reviewed a comprehensive assessment of data collection and storage procedures to ensure all opportunities for error in transposition of data between data were minimized. Uncertainty was assessed as required. The Verifier recalculated the statistics independently to confirm the accuracy of the reported precision.

Field data collection utilized appropriate principles of forestry data collection, including appropriate tools and methods. Collected data was handled appropriately, including a structured process for QA/QC. Analysis of collected data used appropriate formulas, conversions, and parameters, supported by scientific literature. Where ranges of parameters exist, or other types of formulaic uncertainty, appropriately conservative values were used in data analysis.

8.2 Quality of Evidence to Determine GHG Emission Reductions or Removals

During ESI's verification, the evidence provided by the project proponent was more than sufficient in both quantity and quality to support the determination of GHG emission removals reported by the project. Throughout the verification, the Project Proponent demonstrated a commitment toward conservativeness and took all measures appropriate to ensure the reliability of evidence provided. Interviews conducted (oral evidence) are outlined in Section 3.3, and the final documents received from the Project Proponent supporting the determination of GHG removals can be viewed in Appendix A.

8.3 Management and Operational System

The management system employed by the Project Proponent utilizes appropriate field measurement methods (systematic, appropriate measurement tools and techniques), high quality data collection and management techniques (database, with data entry oversight; clearly identified responsibilities for data accuracy; appropriate data quality control), and data analysis. The Project Proponent has demonstrated that they effectively carry out their responsibilities and are appropriately experienced and trained for these responsibilities. Accordingly, in the process of the verification, ESI confirmed the suitability and appropriateness of the Project Proponent's management system for monitoring and reporting.

8.4 Climate Change Adaptation Benefits (GL1)

Climate change (GL1.1):

The PIR identifies 4 categories of impact from expected climate change, originally identified in the validated PDD:

- Food security
- Income
- Health
- Biodiversity

Drought and flooding are both expected to increase, affecting food security. The natural buffer provided by the peat ecosystem would be lost without the project. Income for local residents depends on fishing, limited farming and collection of resources from local forests. All are vulnerable to climate change. Health is expected to suffer due to fire during drought, water quality will also be reduced. Fire, tree mortality, increased habitat loss and fragmentation are expected to increase.

The Project Proponent provided a reference to the climate change studies used in determining these impacts. The following resources were appropriately cited in the PIR which summarise the climate change impacts on the well-being of communities and conservation status of biodiversity were: Case et al, 2007; IPCC, 2007; Measey, 2010.

Risks to CCB benefits from climate change (GL1.2):

Risks are similar to those of the 'without project' scenario, but with the benefit of the peat forest's ecosystem services and resources. In addition, project activities are designed to minimize these risks through:

- Fire suppression teams and techniques introduced
- Irrigation systems
- Farmer field schools and agricultural training in schools
- Reforestation activities

Risks to the project's benefits are mitigated through almost all project activities. Maintaining a usable forest with all or most ecosystem services intact is superior to the alternative of facing impacts of environmental change with a compromised landscape that is no longer available to local communities for resources or services.

Agricultural education classes provided through project funding were observed during the site visit. The general enthusiasm for the project among the local communities was notable, especially in contrast to the previous site visit, where community members maintained a skeptical, wait-and-see attitude. This is likely due to economic benefits already reaching community members.

Income diversity, crop diversity and ecosystem protection are all reasonable mitigation efforts for risks imposed due to climate change.

Community well-being from climate change (GL1.3):

The PIR identifies 4 categories of likely climate change related impacts, listed above under indicator GL1.1. It is reasonable to expect climate change will impact food production from

agriculture as well as fishing, and concurrently affect income. Health effects and increased pressure on habitat are also expected.

A recent change in the length of the wet season was noted, but whether this can be attributed to yearly variation or climate change is unknown at this time.

Community and biodiversity adaptation (GL1.4):

The project activities are designed to maintain the present, natural ecosystem in the project area, which will assist both communities and biodiversity to adapt to the impacts of climate change, especially in light of the 'without project' scenario, which would eliminate the benefits of a natural, intact ecosystem.

In addition, the project activities are designed to provide new income opportunities to local communities, which will alleviate any loss of income due to traditional crop loss and reduction in the fish catch. Planting activities should provide more forest resources for the future. Fire suppression provides multiple direct positive impacts. Exploring new crops provides more resilience for agricultural produces.

9 COMMUNITY

9.1 Net Positive Community Impacts (CM1)

The PIR states that the net community benefits during the monitoring period essentially amounted to the ecosystem services provided by the project lands, which would have been eliminated in the 'without project' scenario.

Additional community benefits are listed in Table 22:

- Employment opportunities (through various means, listed separately in the Table)
- Efficient, low-emissions cook stoves
- Solar lighting
- Community based agroforestry
- Community centers (planning stage)
- Extend World Education's programs (planning stage)
- Micro-credit program (planning stage)
- Sustainable healthcare

In the months after the close of the monitoring period, project hiring and other activities, including the building of community centers, began and activity appears to be accelerating, according to observations made during the site visit.

The Project Proponent provided a number of documents explaining the benefits of the Rimba Raya project to the local communities, which were largely confirmed during the site visit.

A "benefits report" from an NGO by the name of World Growth was provided, titled, "The Economic Benefits of Palm Oil to Indonesia." The report largely focuses on the benefits of palm oil to the regional and national economy, but also speaks of large chunks of the industry (41%)

being dominated by small holders. There is talk of the potential of palm oil to bring the local communities out of poverty. Potential to benefit local communities and the actual reality differ significantly.

The facts on the ground in the area around the Rimba Raya project tell a different story. A local leader in a community beyond the Rimba Raya project zone was interviewed. He spoke of the palm oil industry encroaching on his community's oil palm plantation lands and intimidation from armed groups when he protested these encroachments.

In addition, it was observed that the industrial palm oil plantations prefer to import workers from other islands, rather than people from the local communities. Also, the dominant land use in lands surrounding Rimba Raya are already dedicated to palm oil production, yet the communities were still in poverty, in spite of the supposed great potential of oil palm to alleviate local poverty.

Several reports regarding the palm oil industry and local growers and communities were also provided, outlining the disparity between the professed potential benefits of palm oil production to local communities and the benefits received by local communities.

The Rima Raya project has already lifted the average family in the communities above the national poverty line, even though the project is in its early stages. The oil palm plantations, in existence for years, failed to do so.

9.2 Offsite Stakeholder impacts (CM2)

The PIR discusses three potential negative impacts of the project to offsite stakeholders, including threats to subsistence livelihoods (fishing), hunting for deer and employment with palm oil plantations.

Threats to subsistence livelihoods are minimal, as those activities are not stopped by the project. The alternative scenario, an extension of surrounding oil palm plantations, curtails subsistence livelihoods to a much greater degree. Employment from local plantations is very low, while the project provides jobs and other employment opportunities to many people.

Few negative offsite stakeholder impacts exist, and those are either minimal, far less negative than the 'without project' scenario, or both.

9.3 Exceptional Community Benefits (GL2)

The project was implemented in a part of Indonesia where 50% of the population was below the national poverty line, as demonstrated during validation. It was also demonstrated that the project benefits are likely to reach 50% of the households within the poorest quartile of the communities.

Community monitoring and surveys are geared toward finding and inquiring whether benefits are being received by the poorest community members. The site visit observations and interviews left no doubt that project benefits are reaching poor households and especially women.

10 BIODIVERSITY

10.1 Net Positive Biodiversity Impacts (B1)

The net biodiversity impacts of the project are clearly positive. Biodiversity in the project area depends on leaving the existing ecosystem intact. In the 'without project' scenario, the existing ecosystem would be completely eliminated, and endanger Tanjung Puting National Park to further incursions by palm oil plantations and illegal logging.

All species used in the project are native to the area and are non-GMO, as required by Indonesian law.

The preliminary biodiversity survey, as described in the monitoring plan, was in the process of being conducted when this verification was taking place.

10.2 Offsite Biodiversity Impacts (B2)

The only offsite biodiversity impacts from the project would be the result of leakage, which is being actively monitored. Leakage in an avoided conversion project is unlikely to match the positive biodiversity impacts provided by the project. Mitigation includes monitoring for leakage and monitoring for illegal logging, which also provides employment for local communities.

Even if an area equal to the size of the Rimba Raya project was converted to oil palm plantations as a result of leakage, the project would still provide greater positive biodiversity impacts than negative impacts, because of the buffer the project provides to Tanjung Puting National Park.

10.3 Exceptional Biodiversity Benefits (GL3)

The project proponent chose to use indicator GL3.1 to satisfy gold level biodiversity benefits. A list of endangered and vulnerable species was provided in section 8.3 of the monitoring report, which includes 17 endangered and critically endangered species and 19 vulnerable species. The call of at least one wild orangutan was heard by the verifiers while in the project area.

11 VERIFICATION CONCLUSION

After review of all project information, procedures, calculations, and supporting documentation and site visits, ESI confirms that the monitoring conducted by the Project Proponent, along with the supporting Monitoring & Implementation Report, are accurate and consistent with all aforementioned VCS and CCB criteria, the validated PD, and the selected methodology (*VM0004 v1.0*). ESI confirms that the *Rimba Raya Biodiversity Reserve Project*, Monitoring & Implementation Report (Version 1.5 dated 10 August 2015) has been implemented in accordance with the validated PD.

ESI confirms all verification activities, including objectives, scope and criteria, level of assurance, monitoring and project documentation adherence to *VCS Version 3* (and all associated updates), and *CCB Project Design Standards* (Second Edition), as documented in this report are complete. ESI concludes without any qualifications or limiting conditions that the *Rimba Raya Biodiversity Reserve Project* (15 May 2011), meets the requirements of *VCS Version 3* (and all associated updates) and *CCB Project Design Standards* (Second Edition) for the third monitoring period. The project is achieving the climate, community, and biodiversity benefits, including Gold Level Climate Change Adaptation, Exceptional Community, and Exceptional Biodiversity Benefits as described in the Monitoring & Implementation Report dated 10 August 2015.

The GHG assertion provided by the project proponent and verified by ESI has resulted in the GHG emission reduction or removal of 4,393,291 tCO2 equivalents by the project during the third monitoring/verification period (01 July 2013 – 30 June 2014). This value is net of the 13% (672,486 tCO2 equivalents) buffer withholding based on the non-permanence risk assessment tool.

Reporting period: From 01 July 2013 to 30 June 2014

Verified GHG emission reductions or removals in the above reporting period:

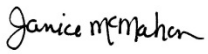
Year	Baseline emissions or removals (tCO_2e)	Project emissions or removals (tCO_2e)	Market Leakage emissions (tCO_2e)	Non-Permanence Risk Buffer (tCO_2e)	Net GHG emission reductions or removals (Net VCU Allocation) (tCO_2e)
2013-2014	5,362,570	-189,603	-133,306	672,486	4,393,291
Total	4,393,291	-189,603	-133,306	672,486	4,393,291

Year	Net VCU Allocation	Buffer Allocation
2013 (Jul-Dec)	2,196,646	336,243
2014 (Jan-Jun)	2,196,645	336,243
Total	4,393,291	672,486

CCB STANDARDS CRITERIA CHECKLIST:

GENERAL SECTION	CONFORMANCE	
G1. Original Conditions in the Project Area (Required)	YES X	NO __
G2. Baseline Projections (Required)	YES X	NO __
G3. Project Design and Goals (Required)	YES X	NO __
G4. Management Capacity and Best Practices (Required)	YES X	NO __
G5. Legal Status and Property Rights (Required)	YES X	NO __
CLIMATE SECTION		
CL1. Net Positive Climate Impacts (Required)	YES X	NO __
CL2. Offsite Climate Impacts ("Leakage") (Required)	YES X	NO __
CL3. Climate Impact Monitoring (Required)	YES X	NO __
COMMUNITY SECTION		
CM1. Net Positive Community Impacts (Required)	YES X	NO __
CM2. Offsite Community Impacts (Required)	YES X	NO __
CM3. Community Impact Monitoring (Required)	YES X	NO __
BIODIVERSITY SECTION		
B1. Net Positive Biodiversity Impacts (Required)	YES X	NO __
B2. Offsite Biodiversity Impacts (Required)	YES X	NO __
B3. Biodiversity Impact Monitoring (Required)	YES X	NO __
GOLD SECTION		
GL1. Climate Change Adaptation Benefits (Optional)	YES X	NO __
GL2. Exceptional Community Benefits (Optional)	YES X	NO __
GL3. Exceptional Biodiversity Benefits (Optional)	YES X	NO __

Report Submitted to:	Verified Carbon Standard Association Climate, Community, and Biodiversity Alliance 1730 Rhode Island Ave. NW, Suite 803, Washington, D.C. 20036 InfiniteEARTH Limited Suite 8/A, The Ritz Plaza, 122 Austin Road, Tsim Sha Tsui Kowloon, Hong Kong
Report Submitted by:	Environmental Services, Inc. -Corporate Office 7220 Financial Way, Suite 100 Jacksonville, Florida 32257

ESI Lead Validator Name and Signature	 Shawn McMahon Lead Validator
ESI Division Regional Technical Manager Name and Signature	 Janice McMahon Sr. Vice President/Technical Director Forestry, Carbon and GHG Services Division
Date:	10 August 2015

EJ/SM/rb VO14061.00/RimbaRaya_VCS_CCBverreportfinal_v02-20150728
K pf 08/10/15f

APPENDIX A – DOCUMENTS RECEIVED/REVIEWED

Documents received 29 December 2014

- Rimba Raya_2013_2014_M3.xlsx
- RimbaRaya_VCS Risk Report Calculation Tool_MB.xls
- VCS CCB Monitoring Implementation Report-M3_V1.0.doc
- VCS CCB Monitoring Implementation Report-M3_V1.0.pdf
- VCS Non-Permanence Risk Report_RimbaRayaM3-V1.0.doc
- VCS Non-Permanence Risk Report_RimbaRayaM3-V1.0.pdf

Documents received 06 January 2015

- VCS CCB Monitoring Implementation Report-M3_V1.1.pdf
- VCS CCB Monitoring Implementation Report Summary_2014_English.pdf
- VCS CCB Monitoring Implementation Report Summary_2014_Indonesia.pdf

Documents received 08 January 2015

- VCS CCB Monitoring Implementation Report-M3_V1.2.pdf

Documents received 11 January 2015

- VCS CCB Monitoring Implementation Report-M3_V1.2.pdf

Documents received 14 January 2015

- IllegalLogging
  - IllegalLogging\Photos Illegal Logging Impact_South Unit.xlsx
  - IllegalLogging\~$Illegal Logging Impact Monitoring_Data.xlsx
  - IllegalLogging\Illegal Logging Impact Monitoring_Data.xlsx
  - IllegalLogging\Illegal Logging Monitoring Report.docx
  - Illegal Logging Survey Map.pdf
- Illegeal Logging Survey
  - Track_IL.shx
  - Open_area_IL.dbf
  - Open_area_IL.prj
  - Open_area_IL.sbn
  - Open_area_IL.sbx
  - Open_area_IL.shp
  - Open_area_IL.shp.GOLD-LAPTOP.8900.2000.sr.lock
  - Open_area_IL.shp.GOLD-LAPTOP.10000.7340.sr.lock
  - Open_area_IL.shp.xml
  - Open_area_IL.shx
  - Track_IL.dbf
  - Track_IL.prj
  - Track_IL.sbn
  - Track_IL.sbx
  - Track_IL.shp
  - Track_IL.shp.GOLD-LAPTOP.8900.2000.sr.lock
  - Track_IL.shp.GOLD-LAPTOP.10000.7340.sr.lock
  - Track_IL.shp.xml
- leakage_classification
  - leakage_classification_2004-08-20_buffer150.shx
  - leakage_classification_2004-08-20.dbf
  - leakage_classification_2004-08-20.prj
  - leakage_classification_2004-08-20.sbn
  - leakage_classification_2004-08-20.sbx
  - leakage_classification_2004-08-20.shp
  - leakage_classification_2004-08-20.shp.xml
  - leakage_classification_2004-08-20.shx
  - leakage_classification_2004-08-20_buffer150.CPG
  - leakage_classification_2004-08-20_buffer150.dbf
  - leakage_classification_2004-08-20_buffer150.prj
  - leakage_classification_2004-08-20_buffer150.sbn
  - leakage_classification_2004-08-20_buffer150.sbx
  - leakage_classification_2004-08-20_buffer150.shp
  - leakage_classification_2004-08-20_buffer150.shp.xml
- burned2014.CPG
- burned2014.dbf
- burned2014.prj
- burned2014.sbn
- burned2014.sbx
- burned2014.shp
- burned2014.shp.xml
- burned2014.shx
- burned2014_projectarea.CPG
- burned2014_projectarea.dbf
- burned2014_projectarea.prj
- burned2014_projectarea.sbn

- burned2014_projectarea.sbx
- burned2014_projectarea.shp
- burned2014_projectarea.shp.xml
- burned2014_projectarea.shx
- BurntPolygons.jpg
- change_2013_2014_final.CPG
- change_2013_2014_final.dbf
- change_2013_2014_final.prj
- change_2013_2014_final.sbn
- change_2013_2014_final.sbx
- change_2013_2014_final.shp
- change_2013_2014_final.shp.xml
- change_2013_2014_final.shx
- change_2013_2014_final_projectarea.CPG
- change_2013_2014_final_projectarea.dbf
- change_2013_2014_final_projectarea.prj
- change_2013_2014_final_projectarea.sbn
- change_2013_2014_final_projectarea.sbx
- change_2013_2014_final_projectarea.shp
- change_2013_2014_final_projectarea.shp.xml
- change_2013_2014_final_projectarea.shx
- classification_2014_final.cpg
- classification_2014_final.dbf
- classification_2014_final.prj
- classification_2014_final.sbn
- classification_2014_final.sbx
- classification_2014_final.shp
- classification_2014_final.shp.GOLD-LAPTOP.8900.2000.sr.lock
- classification_2014_final.shp.GOLD-LAPTOP.10000.7340.sr.lock
- classification_2014_final.shp.xml
- classification_2014_final.shx
- classification_2014_final_projectarea.cpg
- classification_2014_final_projectarea.dbf
- classification_2014_final_projectarea.prj
- classification_2014_final_projectarea.sbn
- classification_2014_final_projectarea.sbx
- classification_2014_final_projectarea.shp
- classification_2014_final_projectarea.shp.xml
- classification_2014_final_projectarea.shx
- Modis_hotspots_2014.dbf
- Modis_hotspots_2014.prj
- Modis_hotspots_2014.sbn
- Modis_hotspots_2014.sbx
- Modis_hotspots_2014.shp
- Modis_hotspots_2014.shx

Documents received 17 January 2015

- RimbaRaya_2014_Mosaic_final.tif.xml
- LC81190622014203LGN00_stack_atm.tfw
- LC81190622014203LGN00_stack_atm.tif
- LC81190622014203LGN00_stack_atm.tif.aux.xml
- LC81190622014203LGN00_stack_atm.tif.ovr
- LC81190622014203LGN00_stack_atm.tif.xml
- LC81190622014235LGN00_stack_atm.tfw
- LC81190622014235LGN00_stack_atm.tif
- LC81190622014235LGN00_stack_atm.tif.aux.xml
- LC81190622014235LGN00_stack_atm.tif.ovr
- LC81190622014235LGN00_stack_atm.tif.xml
- LC81190622014267LGN00_stack_atm.tfw
- LC81190622014267LGN00_stack_atm.tif
- LC81190622014267LGN00_stack_atm.tif.aux.xml
- LC81190622014267LGN00_stack_atm.tif.ovr
- LC81190622014267LGN00_stack_atm.tif.xml
- LE71190622014163EDC01_stack_atm.tfw
- LE71190622014163EDC01_stack_atm.tif
- LE71190622014163EDC01_stack_atm.tif.aux.xml
- LE71190622014163EDC01_stack_atm.tif.ovr
- LE71190622014163EDC01_stack_atm.tif.xml
- RimbaRaya_2014_Mosaic_final.tfw

- RimbaRaya_2014_Mosaic_final.tif
- RimbaRaya_2014_Mosaic_final.tif.aux.xml
- RimbaRaya_2014_Mosaic_final.tif.ovr

Documents received 21 January 2015

- Validation_Audit_Plan_2015_V3.0_2101'15.doc

Documents received 23 January 2015

- Potential Interviewees for the Rimba Raya Project_LDJ Comments.docx

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- 2014
  - classification_2014_final_projectarea.xml
  - accuracyassessment_2010-2014_final.xls
  - classification_2014_final.cpg
  - classification_2014_final.dbf
  - classification_2014_final.prj
  - classification_2014_final.sbn
  - classification_2014_final.sbx
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  - classification_2014_final_projectarea.prj
  - classification_2014_final_projectarea.sbn
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  - classification_2014_final_projectarea.shx
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  - change_2013_2014_final.dbf
  - change_2013_2014_final.dbf
  - change_2013_2014_final.prj
  - change_2013_2014_final.sbn
  - change_2013_2014_final.sbx
  - change_2013_2014_final.shp
  - change_2013_2014_final.shx
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  - change_2013_2014_final_projectarea.dbf
  - change_2013_2014_final_projectarea.dbf
  - change_2013_2014_final_projectarea.prj
  - change_2013_2014_final_projectarea.sbn
  - change_2013_2014_final_projectarea.sbx
  - change_2013_2014_final_projectarea.shp
  - change_2013_2014_final_projectarea.shp.GOLD-LAPTOP.6852.7848.sr.lock
  - change_2013_2014_final_projectarea.shp.xml
  - change_2013_2014_final_projectarea.shx
- Deforestation
  - Deforestation_2013-14.shx
  - Deforestation_2013-14.dbf
  - Deforestation_2013-14.prj
  - Deforestation_2013-14.sbn
  - Deforestation_2013-14.sbx
  - Deforestation_2013-14.shp
  - Deforestation_2013-14.shp.xml
- Fire
  - LandCoverClassification_Fire2014.shx
  - LandCoverClassification_Fire2014.dbf
  - LandCoverClassification_Fire2014.prj
  - LandCoverClassification_Fire2014.sbn
  - LandCoverClassification_Fire2014.sbx
  - LandCoverClassification_Fire2014.shp
  - LandCoverClassification_Fire2014.shp.xml
- FirstRoundFindings
  - RimbaRayaFindings_RSSrelatedqueries.xlsx
  - 061_Rimba_VCS_Rd1Findings_20150227.xlsx
  - 061_Rimba_VCS_Rd1Findings_20150227_RRCResponses.xlsx
  - 061_Rimba_VCS_Rd1Findings_20150227_specificissuestoraise.xlsx

  - 061-Rimba_CCB_Rd1Findings_20150228.docx
  - 061-Rimba_CCB_Rd1Findings_20150228.pdf
  - Kopie von RimbaRayaFindings_RSSrelatedqueries.xlsx
  - RimbaRaya_VCS Risk Report Calculation Tool_M3_0.1.xls
- Revised Material 2014
  - VCS Non-Permanence Risk Report_RimbaRayaM3_V1.1.doc
  - ~$S Non-Permanence Risk Report_RimbaRayaM3_V1.1.doc
  - 061-Rimba_CCB_Rd1Findings_20150228_RRREsponses.docx
  - Rimba Raya_M22013_2014V1.0.xlsx
  - RimbaRaya_VCS Risk Report Calculation Tool_M3.xls
  - VCS CCB Monitoring Implementation Report-M3.docx

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- CCBResponses
  - 061-Rimba_CCB_Rd1Findings_RRResponses.docx
  - CCB2_1
    - VCSEmail_GL2_1.pdf
  - CCBB1_3
    - Seedling Data_Ulak Batu_October 2014.xlsx
    - Seedling Data_Muara Dua_October 2014.xls
  - CCBG1_1
    - inodesian_climate_change_impacts_report_14nov07.pdf
    - Global_Majority_e_Journal_1-1_Measey.pdf
  - CCBG4.7
    - Rimba Raya Financial Report 2015.xlsx
  - CCBG4_5
    - Payment System Replanting Muara Dua.xlsx
    - Daily Employment Agreement_Casual Staff_TEMPLATE_22Dec2014.doc
    - Employment Agreement for field staf Ahmad Said.doc
    - Jobdesc02_FieldStaff_STAFFMEMBER_Des2014_CNS.docx
  - CCBG5.6
    - WorkingAreaMap.jpg
    - ERCLicense
      - SK_146.shx
      - Decree_36,000 ha.pdf
      - Map 36,000 decree.pdf
      - RRC_63828_HA.dbf
      - RRC_63828_HA.prj
      - RRC_63828_HA.sbn
      - RRC_63828_HA.sbx
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    - PTBest
      - RRC_Project_Best_CCA.jpg
      - Att-4c. Letter from BEST Agro Int. Group_2010 September 15th.pdf
      - BEST.dbf
      - BEST.prj
      - BEST.sbn
      - BEST.sbx
      - BEST.shp
      - BEST.shp.xml
      - BEST.shx

- BEST_Letter_Final_July 2012.pdf
- Draft MoU BEST-RRC_Land-authority Transfer_Nop 2012.pdf
- Letter from BEST 160712_Translation.pdf
- PT Best Agreement.pdf
- RRC_Best.jpg

▪ TPNP
- Revised TNTP_RRC Cooperation Agreement_18.642ha.pdf
- Revised RRC_TPNP Map_18642ha.jpg

▪ Revised Working Area Map_Final-1 (2).jpg
▪ Working Area Map.pdf

- RiskResponses
  - REDD Competitive with Oil Palm.pdf
  - VCS32
    - Rimba Raya Financial Report 2015.xlsx
  - VCS33
    - WorldBank_2009.pdf
    - LuandLui_2013.pdf
    - OC NVP Book_M3..xlsx
    - Sargent_2001.pdf
    - WG_Indonesian_Palm_Oil_Benefits_Report-2_11.pdf
  - VCS35
    - WorkingAreaMap.jpg
    - ERCLicense
      - SK_146.shx
      - Decree_36,000 ha.pdf
      - Map 36,000 decree.pdf
      - RRC_63828_HA.dbf
      - RRC_63828_HA.prj
      - RRC_63828_HA.sbn
      - RRC_63828_HA.sbx
      - RRC_63828_HA.shp
      - RRC_63828_HA.shp.xml
      - RRC_63828_HA.shx
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      - SK_146.sbn
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      - SK_146.shp.xml
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      - BEST.shp.xml
      - BEST.shx
      - BEST_Letter_Final_July 2012.pdf
      - Draft MoU BEST-RRC_Land-authority Transfer_Nop 2012.pdf
      - Letter from BEST 160712_Translation.pdf
      - PT Best Agreement.pdf
      - RRC_Best.jpg
    - TPNP
      - Revised TNTP_RRC Cooperation

- Agreement_18.642ha.pdf
- Revised RRC_TPNP Map_18642ha.jpg
- Revised Working Area Map_Final-1 (2).jpg
- Working Area Map.pdf

- VCS
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    - WorkingAreaMap.jpg
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      - Decree_36,000 ha.pdf
      - Map 36,000 decree.pdf
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      - RRC_63828_HA.prj
      - RRC_63828_HA.sbn
      - RRC_63828_HA.sbx
      - RRC_63828_HA.shp
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      - RRC_Project_Best_CCA.jpg
      - Att-4c. Letter from BEST Agro Int. Group_2010 September 15th.pdf
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      - BEST.sbn
      - BEST.sbx
      - BEST.shp
      - BEST.shp.xml
      - BEST.shx
      - BEST_Letter_Final_July 2012.pdf
      - Draft MoU BEST-RRC_Land-authority Transfer_Nop 2012.pdf
      - Letter from BEST 160712_Translation.pdf
      - PT Best Agreement.pdf
      - RRC_Best.jpg
    - TPNP
      - Revised TNTP_RRC Cooperation Agreement_18.642ha.pdf
      - Revised RRC_TPNP Map_18642ha.jpg
    - Revised Working Area Map_Final-1 (2).jpg
    - Working Area Map.pdf
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    - Norway-Indonesia-LoI.pdf
    - 20121112090818_GoI - Presidential Instruction No. 10 2011 regarding suspension of granting of new licenses and improvement of governance of natural primary forest and peat land.pdf
    - CIFORReporton Moratorium.pdf
  - VCS22
    - couwenberg et al. 2009 GHG fluxes tropical peat SE Asia GCB.pdf
  - VCS32
    - Rimba Raya Financial Report 2015.xlsx
  - VCS33
    - OC NVP Book_M3..xlsx
    - LuandLui_2013.pdf

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- CCB
  - 061-Rimba_CCB_Rd2Findings_20150512.docx
  - Round2Responses
    - 061-Rimba_CCB_Rd2Findings_20150609.docx
    - CM1-1
      - palmoilindigenouspeoplesoutheastasiafinalmceng_0.pdf
      - WG_Indonesian_Palm_Oil_Benefits_Report-2_11-1.pdf
      - biodiscoveriesborneosbotanicalsecret.pdf
      - ExtractPage1.jpg
      - ExtractPage1.pdf
      - ExtractPage1.xcf
      - ExtractPage2.jpg
      - ExtractPage3.jpg
      - ghostsonourownlandtxt06eng.pdf
      - ghostsonourownlandtxt06eng-1.pdf
      - Millenium goals_1.jpg
      - Millenium goals_2.jpg
      - Millenium goals_3.jpg
    - G4_6
      - RRC Training Plan_2015_V1.0.xlsx
      - RRC Preliminary Risk Assessment_V2.0_0406'15.docx
    - G5.2
      - Kesepakatan Kerja sama Ulak Batu.pdf
      - Kesepakatan Kerja sama Muara Dua.pdf

Documents received 24 June 2015

- VCS CCB Monitoring Implementation Report-M3_secondroundV2.pdf

Documents received 30 June 2015

- VCS CCB Monitoring Implementation Report-M3_secondroundV2.doc
- VCS_1
  - Final Report PBD of RRC_Indonesia.pdf
- VCS_2
  - Operational
    - LC_2014.xml
    - LC_2008.cpg
    - LC_2008.dbf
    - LC_2008.prj
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    - LC_2008.xml
    - LC_2008_LC_2009_CHANGE.cpg
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    - LC_2008_LC_2009_CHANGE.prj
    - LC_2008_LC_2009_CHANGE.sbn
    - LC_2008_LC_2009_CHANGE.sbx
    - LC_2008_LC_2009_CHANGE.shp
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- LC_2014.shx

o Non_operational

- LC_2014.xml
- LC_2008.cpg
- LC_2008.dbf
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- LC_2014.shx

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- CF03023-G.JPG

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- Gr03045-N.JPG

o LandCoverAssessmentPhotos
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  - CF03017-S.JPG

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o PSF01015,630870,9693220,RRCNU
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- IMGP2126.JPG

o PSF01017,642043,9652633,RRCNU
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- IMGP2132.JPG

o RF01001,639035,9688363,RRCNU
- IMGP1645.JPG
- IMGP1643.JPG
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- IMGP1645 (haryo@rimba-raya.com).JPG

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- IMGP1639.JPG

o SHR02077, 642836, 9662177, RRCCU
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- IMGP5240.JPG

o SHR02123, 639675, 9657529, RRCCU
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- IMGP5636.JPG

o WATER01013,636881,9690813,RRCNU
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        - IMGP5208.JPG
        - IMGP5209.JPG
        - IMGP5210.JPG
- VCS_16
    - QA&QCPlan_v 1.2.pdf
- VCS_17
    - SOPSubsidence_Monitoring of subsidence poles and water depth.docx
    - SOP Fire_MODIS Hotspot Monitoring.docx
    - SOP_AnnualDisturbanceMonitoring-V1.2.docx
    - SOPFire_Fire Field Measurement.docx
    - SOPLandCoverChange_Monitoring Land Cover Change.docx
    - SOPLeakage_Monitoring Leakage Activity.docx
    - SOPLogging_Monitoring Logging Gaps.docx
- VCS_18
    - Breakeven Financial Report - revised-1.xlsx
- 061_Rimba_VCS_Rd2Findings_20150527.xlsx
- Rimba Raya_M3_2013_2014V2.0.xlsx

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- VCS_8
    - burn_scars_acc_assessment_2014.xml
    - burn_scars_acc_assessment_2014.shx
    - burn_scars_acc_assessment_2014.shp
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    - burn_scars_acc_assessment_2014.cpg
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        - FBA-CU-201505-0003-002.JPG

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        - FBA-CU-201505-0003-004.JPG
        - FBA-CU-201505-0003-005.JPG
        - FBA-CU-201505-0003-006.JPG

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- FBA-CU-201505-0010
    - Burnt Assessment
        - Central Unit
            - FBA-CU-201505-0010-005.JPG
    - FBA-CU-201505-0010-001.JPG
    - FBA-CU-201505-0010-002.JPG
    - FBA-CU-201505-0010-003.JPG
    - FBA-CU-201505-0010-004.JPG
    - FBA-CU-201505-0010-006.JPG
    - FBA-CU-201505-0010-007.JPG

Documents received 14 July 2015

- SOP_responserow19
    - SOPLandCoverChange_LandCoverChangeAnalysis_External.docx
- BurntAreas_responserow7
    - BurntLandcover_2014.shx
    - burned2013_2014_projectarea_update.dbf
    - burned2013_2014_projectarea_update.prj
    - burned2013_2014_projectarea_update.sbn
    - burned2013_2014_projectarea_update.sbx
    - burned2013_2014_projectarea_update.shp
    - burned2013_2014_projectarea_update.shp.xml
    - burned2013_2014_projectarea_update.shx
    - burned2013_2014_update.dbf
    - burned2013_2014_update.prj
    - burned2013_2014_update.sbn
    - burned2013_2014_update.sbx
    - burned2013_2014_update.shp
    - burned2013_2014_update.shp.xml
    - burned2013_2014_update.shx
    - BurntLandcover_2014.dbf
    - BurntLandcover_2014.prj
    - BurntLandcover_2014.sbn
    - BurntLandcover_2014.sbx
    - BurntLandcover_2014.shp
    - BurntLandcover_2014.shp.xml

Documents received 16 July 2015

- VCSRound3
    - VCS CCB Monitoring Implementation Report-M3_thirdroundV1.0.doc
    - ResponseRow7
        - LeakageAreaAccuracyAssessment
            - rasters_used_for_classification2.xlsx
            - accuracyassessment_final.xls
    - 061_Rimba_VCS_Rd3Findings_20150710.xlsx
    - Rimba Raya_M3_2013_2014V3.0.xlsx

Documents received 19 July 2015

- VCS CCB Monitoring Implementation Report-M3_thirdroundV1.0.doc

Documents received 24 July 2015

- VCS CCB Monitoring Implementation Report-M3_V1.3.pdf
- 061- Rimba Raya VCS CCB 3rd Monitoring Period Verification Report_cg.docx

Documents received 28 July 2015

- VCS CCB Monitoring Implementation Report-M3_V1.4.pdf
- Rimba Raya_M3_2013_2014V4.0.xlsx
- VCS CCB Monitoring Implementation Report-M3_V1.4.doc

Documents received 31 July 2015

- VCS CCB Monitoring Implementation Report-M3_V1.4.pdf
- VCS CCB Monitoring Implementation Report-M3_V1.4.doc

Documents received 10 August 2015

- VCS CCB Monitoring Implementation_ReportSummary_Indonesia_v1.5.pdf
- 061_Rimba_versamplplan_clientfinalV3_03082015.pdf

- VCS CCB Monitoring Implementation Report-M3_V1.5.pdf

APPENDIX B – VCS NCR/CL/OFI SUMMARY

Item Number	1
VCS Standard VCS Version 3 Requirements Document 08 October 2013, v3.4	3.11.1 The project description shall be accompanied by documentary evidence establishing conclusively one or more of the following rights of use (see VCS document Program Definitions for definition of right of use) accorded to the project proponent(s): 1) A right of use arising or granted under statute, regulation or decree by a competent authority. 2) A right of use arising under law. 3) A right of use arising by virtue of a statutory, property or contractual right in the plant, equipment or process that generates GHG emission reductions and/or removals (where such right includes the right of use of such reductions or removals and the project proponent has not been divested of such right of use). 4) A right of use arising by virtue of a statutory, property or contractual right in the land, vegetation or conservational or management process that generates GHG emission reductions and/or removals (where such right includes the right of use of such reductions or removals and the project proponent has not been divested of such right of use). 5) An enforceable and irrevocable agreement with the holder of the statutory, property or contractual right in the plant, equipment or process that generates GHG emission reductions and/or removals which vests the right of use in the project proponent. 6) An enforceable and irrevocable agreement with the holder of the statutory, property or contractual right in the land, vegetation or conservational or management process that generates GHG emission reductions or removals which vests the right of use in the project proponent. 7) A right of use arising from the implementation1 or enforcement of laws, statutes or regulatory frameworks that require activities be undertaken or incentivize activities that generate GHG emission reductions or removals.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR Section 3.2, internet search on 19 January 2015
ESI Findings - Round 1 (27 February 2015)	A risk based review of changes to current Rights of Use was performed and nothing contrary to the existing agreements was found. The project Rights of Use were formalized to include three different areas. 1. Area that will become the National Park, with Rimba Raya having the rights to the carbon. 2. Awarding of the concession from the Indo Government to the Rimba Raya project. 3. Management agreements with PT Best that secure PT Rimba Raya Conservations' Right of Use over the concession area. The project finally had all the agreements signed in 2013.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please assert whether any changes have occurred to the project since validation to the Rights of Use following all criteria of this requirement. Please also confirm that the existing agreements have been valid through the monitoring period. Please keep this response separate to similar finding requests related to Risk.

Round 1 Response from Project Proponent (18 April 2015)	There have been no changes to the Rights of Use over the Project Management Zone nor the Carbon Accounting Area since Project Validation. The existing arrangements have been valid though the current monitoring period and are provided as supporting information in response to this clarification request. These are the same agreements that were provided in all verifications since validation. These agreements are provided again in response to this clarification request.
ESI Findings - Round 2 (27 May 2015)	The Project Proponent's clarification that the Rights of Use have not changed since validation, and the Verification Team's field visit observations and discussions with government members sufficiently indicate no changes to Rights of Use since validation. This item is addressed.

Item Number	2
VCS Standard VCS Version 3 Requirements Document 08 October 2013, v3.4	3.16.6 The monitoring report describes all the data and information related to the monitoring of GHG emission reductions or removals. The project proponent shall use the VCS Monitoring Report Template and adhere to all instructional text within the template.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR General
ESI Findings - Round 1 (27 February 2015)	Formatting needs improvement in some sections of the report. For example, the Table of Contents and larger font on pg 83. Equations are often unreadable, for instance Equation 121 on pg 75 and Table 17 parameters. Also on page 75 the references "Error! Reference source not found. and Error! Reference source not found." need to be fixed. Template has been followed correctly except for the addition of Section 6.3 "Treatment of Uncertainty Ex-Post."
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please fix all spelling, grammatical, and formatting discrepancies in the MR to improve readability and follow VCS instructional text. Note the response to this finding will be evaluated against the final monitoring report issued.
Round 1 Response from Project Proponent (18 April 2015)	A thorough edit of the revised MR was completed to fix spelling, grammatical and formatting discrepancies.
ESI Findings - Round 2 (27 May 2015)	The reviewer checked the items noted as examples and offers the following comments: Table 20 contains a misplaced comma in the Net VCU Allocation column. For the Bdi parameter in Section 5.2 & Section 5.3, in the "Any comment" box, "if" should state "is."
Round 2 NCR/CL/OFI (27 May 2015)	
Round 2 Response from Project Proponent (30 June 2015)	

ESI Findings - Round 3 (10 July 2015)	Although no request was submitted at Round 2 for fixing formatting and spelling errors in the MR, it is issued at this Round 3. Page 83 in Section 6.4 (4.) of the MR contains different paragraph formatting. Page 60 in parameter table Ap,burn,it: Any comment should state "ground truthing". Page 75 contains "see Error! Reference source not found. and Error! Reference source not found." These issues were discussed with the PP who subsequently fixed all MR formatting errors. The item is addressed.

Item Number	3
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	8.2.2.3 Estimation of peat bulk density (BD_i) Measurements of peat bulk density should be taken across each stratum within the project boundary. Determining the locations and distribution of samples should be determined prior to field work and can follow the sampling strategy outlined in Section 5 above for constructing a peat depth map. Peat bulk density can be measured using either specialized peat samplers or standard soil bulk density cylinders. ...Sampling to 30-50 cm depth is appropriate because it is the top layer of peat that would be disturbed under the baseline scenario.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR Section 5.2, 5.3
ESI Findings - Round 1 (27 February 2015)	The BDi parameter was included in Section 5.2 and 5.3 of the MR. BDi in section 5.3 for monitoring contains conflicting information about the source of the 0.1505 g cm-3 = t m-3 value. Source of data is fieldwork, not monitored, and the project sought advice from an expert. The methodology notes this parameter is set at validation and also monitored, the baseline value is suitable but the source of the monitored value needs to be consistent in the parameter table.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please address the findings and clarify for the monitored parameter BDi the source of data within the parameter table.
Round 1 Response from Project Proponent (18 April 2015)	The information relating to BDi in Section 5.2 and 5.3 was edited to present consistently between the sections information related to the variable bulk density.
ESI Findings - Round 2 (27 May 2015)	The reviewer checked this parameter. In Section 5.2, it appears this parameter is still using the default value until new information becomes available. In Section 5.3, the parameter has been changed to be consistent with Section 5.2. However, it is unclear what the project has done in this monitoring period (consult expert, review literature, etc.) to determine if the site-specific data is still the most relevant. It appears this parameter was obtained from the peat bulk density report (not yet supplied) and is applied in uncertainty calcs. Note a misprint: For the Bdi parameter in Section 5.2 & Section 5.3, in the "Any comment" box, "if" should state "is." The reviewer added this to the Finding in Section 3.16.6 of the Standard 3.4 tab.

Round 2 NCR/CL/OFI (27 May 2015)	CL: The verification team noted that Section 5.3 has been changed to be consistent with Section 5.2. Please clarify what the project has done in this monitoring period (consult expert, review literature, etc.) to determine if the site-specific data is still the most relevant.
Round 2 Response from Project Proponent (30 June 2015)	The second round finding from ESI incorrectly states that the Project is using a default value for bulk density. The Project uses a site specific value for bulk density. The bulk density field report completed at validation is provided with this response. There is no requirement by the methodology to consult an expert or review literature to determine if 'site specific' data is still the most relevant. It is the PP position that site specific data would always be most relevant.
ESI Findings - Round 3 (10 July 2015)	Verifiers agree with the proponents assertion that site specific data, when available, is most relevant. The value used in quantification for this verification closely aligns with literature values reported in Table 3 of VM0004. The bulk density field report provided as a response to the finding, though generally in Indonesian language but still discernible, is sufficient to demonstrate good practice for estimates of peat bulk density across the project area. The item is addressed.

Item Number	4
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	At each verification, documentation shall be provided covering the other lands controlled by the baseline agent where leakage could occur, including, at a minimum, their location(s), area and type of existing land use(s), and management plans. It must also be demonstrated that the total area of government permits (for deforestation activities) that have been granted to the baseline agent of deforestation has not increased due to the implementation of project activities.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR Section 6.4, Rimba Raya_2013_2014_M3.xlsx
ESI Findings - Round 1 (27 February 2015)	Per this requirement, at this 3rd verification, no management plan documentation has been provided covering other lands controlled by the baseline agent where leakage might occur. Evidence is also needed that government permits granted have not increased due to the project. Verifiers understand that concessions given by the government have stopped.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please provide management plan documentation of the other lands controlled by the baseline agent of deforestation and evidence that government permits are no longer granted following this requirement.

Round 1 Response from Project Proponent (18 April 2015)	Item 1: Section 10.2 of the methodology states 'the project shall demonstrate that the management plans and/or land-use designations of other lands controlled by the baseline agent of deforestation have not materially changed as a result of the planned project (e.g., designating new lands as plantation concessions, increasing harvest rates in lands already managed for plantation products, clearing intact forests for plantation establishment); if they have changed, the project shall quantify the impact of these management changes and deduct the associated reductions in carbon stocks or increases in GHG emissions from CBSL.' This statement of and/or clearly allows for leakage estimates to be based on either changes in management plans OR land-use designations of the agent of deforestation. As the Project Proponent cannot access management plan of the identified agent of deforestation it has relied on the allowed alternative option of tracking and reporting new land use designations of the agent of deforestation. Therefore the Proponent does not consider the clarification request of the verifier for management plan documentation consistent with the documented monitoring approach of the Project. Item 2: In May 2010, the national government of Indonesia announced a moratorium prohibiting district governments from granting new concession licenses. The moratorium was enacted in the context of a national strategy for reducing emissions from deforestation (REDD+), a national target of reducing greenhouse gas emissions projected to 2020 by 41% while increasing gross domestic product by 7% per year, and a $1 billion bilateral cooperative agreement with Norway on reducing emissions from deforestation. The moratorium came into force in May 2011 and was extended in May 2013 for an additional 2 y. To verify that no new permits on peat soils have been allocated to the identified agent of deforestation the latest concession shapefiles were sourced from the Forest Service of the Seyryan District. Additionally interviews with the local forester confirmed that no new concessions had been allocated. This process was inline with the procedure developed with verifiers following the previous verification.
ESI Findings - Round 2 (27 May 2015)	The verification team concurs that an earlier part of Section 10 appears to allow for an alternative to acquiring the management plans from the baseline agent of deforestation. The project has sufficiently demonstrated that no new permits have been issued by the Indonesian government. Changes to be reviewed in land use designation are conducted through the leakage component of the methodology, which accounts for emissions caused by activity displacement and is assessed elsewhere in this review. Application of Equation 70 will be reviewed in the context of potential changes to LKAPlanned, it. Finding is addressed.

Item Number	5
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	In each stratum, GHG emissions due to activity shifting leakage at time t consist of two components: (1) the initial changes in carbon stocks and GHG emissions that are accounted for in the year of clearing; and (2) continued changes in carbon stocks and GHG emissions that occur in subsequent years as a result of peat drainage or clearing land on mineral soils for annual cropland: Equation 70

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Rimba Raya_2013_2014_M3.xlsx (Round 1 review); Section 6.5.4 of VCS CCB Monitoring Implementation Report-M3.docx (Round 2 review)
ESI Findings - Round 1 (27 February 2015)	Equation 70 was not applied correctly as initial stocking is not on a per stratum basis.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please address the findings and compute variables following Equation 70 on a per stratum basis.
Round 1 Response from Project Proponent (18 April 2015)	Variables related to Leakage have been computed following equation 70 on a per stratum basis. The new version of the calculation spreadsheet clearly demonstrates this with Equation headings on the tab 'Activity Shifting Leakage'. The estimates for the current monitoring period (2013-2014) are highlighted blue to distinguish from previous monitoring periods.
ESI Findings - Round 2 (27 May 2015)	The verification team reviewed the newly provided monitoring spreadsheet and observed the single activity shifting leakage variable (Peat Swamp Forest) in Column G of the "Activity Shifting Leakage" tab. The MR states that leakage is only accounted for that has occurred without a permit and the PP has stated that leakage was "land converted around the concession was already degraded, non-forest land on mineral soil and if it was non-forest for at least ten years." No leakage which may have occurred at this verification period is being accounted for. The project has not yet provided the necessary documentation showing the location, area, and type of existing land use (land-use designations) which are monitored by comparing suspected leakage areas to 2004 Landsat imagery. This follows Section 10.2 of VM0004 where it states "Evidence of this displacement shall be presented in the PDD at the time of project verification." Verifiers reviewed "TotalPTBESTLeakage.shp" (provided at previous verification), in which computed areas do not agree with LKAplanned,it values currently used. Verifiers also reviewed "leakage_classification_2004-08-20.shp" and the values there do not agree with LKAplanned,it values in the calc worksheet. It seems to verifiers that the second term of Equation 70, the value for LKAPlanned should be computed following Equations 73 and 74 (details of which are requested in the next finding). The area (only for peat swamp) of leakage in the calc worksheet remains the same from initial verification and is divided by 3 for unknown reasons for all verification periods.
Round 2 NCR/CL/OFI (27 May 2015)	CL: Please provide the geospatial files used in quantification of leakage following Equation 70. Please also confirm the correct 2004 period geospatial files/Landsat imagery used to substantiate land cover types prior to deforestation by PT BEST. Finally, please also explain quantitative methods for the parameter LKAPlanned as applied in Equation 70.
Round 2 Response from Project Proponent (30 June 2015)	The leakage calculations were completely redone within the calculation spreadsheet and are now completed in accordance with the methodology. Additional shapefiles of the concessions have been provided in support of this response.

ESI Findings - Round 3 (10 July 2015)	Verifiers note the overhauled leakage quantification in the newly submitted monitoring calc worksheet. These revised leakage calcs were discussed in a meeting between verifiers and the PP on 07 July 2015. During this discussion, the PP explained that 3 parcels of the original 15 PT BEST granted palm oil concessions were the only parcels eligible for leakage. Verifiers reviewed newly submitted leakage shapefiles where deforestation or plantation conversion was quantified from classification of yearly Landsat imagery. There appears to be some inconsistency in applying hectares (Adef,leakage) from leakage due to plantation conversion, in change year 2012-2013 bare ground to plantation conversion was included, but in change year 2013-2014 it was not. Also, verifiers note that PT BEST concessions boundary hectares do not seem to match the table presented in the MR Table 18 and PD (same table). In review of the components for Equation 70, verifiers were unable to locate language in the methodology suggesting that only peat soil strata are to be used in accounting. Page 44 states, "In each stratum,..." Additional detail is needed to describe leakage quantification in the MR, specifically pertaining to the recent revisions and methods employed by the PP.
Round 3 NCR/CL/OFI (10 July 2015)	CL: Please describe in Section 6.4 of the MR the quantification methods for determination of leakage, noting specific methodology requirements and project adherence. Please explain in the response to this finding the methods used for compiling hectares eligible for leakage accounting (Adef, leakage), addressing the instance noted in the finding. Please also explain in detail, in the MR, how the 3 eligible parcels (PT BEST) were selected for the leakage analysis. Finally, please justify accounting for only peat soil strata in leakage quantification, providing examples of whether this is the intent of the methodology and is conservative.
Round 3 Response from Project Proponent (16 July 2015)	A summary of the approach to leakage calculations was provided in Section 6.4 of the monitoring report as requested. This summary followed the methodology approach to add understanding. This explanation includes a description of why the 3 parcels are considered eligible for monitoring of leakage. It also provides an explanation as to why the concessions areas have variations between years. Additionally the elements of the methodology are quoted to justify why emissions from mineral soils are considered zero. Finally the areas of bare ground converted to plantation have been corrected for the current monitoring period and it was conservatively assumed that all bare ground was previously peat swamp forest.
Final ESI Findings (19 July 2015)	Section 6.4 of the MR now appropriately outlines methods employed for leakage quantification and assists the reader in understanding these new methods. Areas have been updated to reflect the current files supplied by the Indonesian Provincial Forestry Agency. The methodology requirements are properly referenced to assist the reader. Associated leakage quantification was checked and confirmed correct. The item is addressed.

Item Number	6
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	10.2.1 Area of activity shifting leakage ($LKA_{planned,it}$) Considering that pre-project activities may or may not be displaced to areas that are similar to those found in the project area (i.e., activities may or may not be displaced to a baseline stratum), it may necessary to stratify the area of activity displacement for leakage analysis.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR Section 6.4, verification site visit, Rimba Raya_2013_2014_M3.xlsx
ESI Findings - Round 1 (27 February 2015)	This parameter for the area of activity shifting leakage at time t was not computed correctly for the monitoring period following equation 74 and Step 3 below. Steps 1-2 pertain to the baseline but Step 3 is pertinent to this verification at the 5th year of monitoring. Further, the accounting has assumed that no leakage has occurred (Cell B7 within tab "ActivityShiftingLeakage_2014"). The computation worksheet does not clearly show calculations for the parameter. Project has been monitoring leakage by the agent of deforestation, PT BEST, each year. Verifiers visited locations of leakage during the site visit.
Round 1 NCR/CL/OFI (27 February 2015)	NCR: Please address the findings and justify omission of equation 74 in computations. Please also provide transparent computations identifying parameters of the results and include leakage which was detected in the monitoring period.
Round 1 Response from Project Proponent (18 April 2015)	
ESI Findings - Round 2 (27 May 2015)	There was no response provided to this NCR and is therefore re-issued again. PP claims that deforestation performed by PT BEST does not constitute leakage for this monitoring period per VM0004, but ground observations on-site and historic behaviour of the agent suggest otherwise. Following 10.2.1 requirements, the amount of leakage to be accounted for at this verification (LKAPlanned, it) should be predicted deforestation within project boundaries (set at validation) minus observed agent deforestation on all their lands. Verifiers were unable to locate this estimate in the PD, though parameter WOPA, it was mentioned in parameter tables. In the current leakage analysis, only peat swamp is accounted for though leakage areas have been appropriately stratified.
Round 2 NCR/CL/OFI (27 May 2015)	NCR: Please address the findings at Round 1 and Round 2 and justify omission of equations following Section 10.2.1 in computations. Please also include leakage which was detected in the monitoring period following the requirements of Section 10.2.1.

Round 2 Response from Project Proponent (30 June 2015)	A detailed response to this NCR was provided within a word file submitted to the verifier. Further clarification was also provided in Section 10.2.1 of the Monitoring Report.
ESI Findings - Round 3 (10 July 2015)	Verifiers note that no word document was submitted to explain the new leakage calcs, however the new approach was discussed in a meeting between verifiers and the PP on 07 July 2015. Further, the response refers to a Section 10.2.1 which doesn't exist in the MR. Since the above finding encompasses this item, the item here is addressed.

Item Number	7
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	Monitoring of the project boundary is meant to demonstrate that the actual area where baseline activities were prevented conforms to the area outlined in the project plan. The following monitoring activities are foreseen:
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR Section 5.1.4
ESI Findings - Round 1 (27 February 2015)	Table 9 and 10 headings do not match content within the table below.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Table 9 notes "Monitoring Component (pg ref in Meth)" yet no page reference is below. Please correct. Also the heading "Remote sensing data, resolution, coverage and years" does not contain the appropriate content in the cells below it. Please correct.
Round 1 Response from Project Proponent (18 April 2015)	The redundant text (pg ref in Meth) was removed from both Table 9 and 10. the heading 'Remote sensing data, resolution, coverage and years' was changed to 'Remote sensing data source" to more accurately reflect the content presented in the cells below.
ESI Findings - Round 2 (27 May 2015)	Appropriate changes were made to Tables 9 and 10 in the MR to reflect the content. The item is addressed.

Item Number	8
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	Monitoring of the project boundary is meant to demonstrate that the actual area where baseline activities were prevented conforms to the area outlined in the project plan. The following monitoring activities are foreseen:

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR Section 5.1.4
ESI Findings - Round 1 (27 February 2015)	Verifiers suggest describing spatial data used for monitoring in more detail. The PD mentions scene references (path-row) for palm concessions. This information and the path-row for the project area would be useful to the reader.
Round 1 NCR/CL/OFI (27 February 2015)	OFI: Verifiers suggest noting the specific Landsat sensors employed (7, 8), coverage, acquisition date and path-row identifiers for project area and leakage monitoring.
Round 1 Response from Project Proponent (18 April 2015)	The Landsat sensors employed, coverage, acquisition date, and path row identifiers of the images used was added as an appendix to the Monitoring Report. A footnote was added to Tables 9 and 10 to direct the reader to this information.
ESI Findings - Round 2 (27 May 2015)	Appendix 1 was added to the MR which shows Landsat sensor type, location and acquisition date. The item is addressed.

Item Number	9
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	•Number and location of logging gaps by date, location, biomass lost or affected, and the preventative or curative measures, if any implemented
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	M3 MR Section 6.2.1
ESI Findings - Round 1 (27 February 2015)	Field visits were conducted around the perimeter of the project boundary by OFI to determine if logging encroachment had occurred during the monitoring period. Step 1 of Section 6.2.1 stated "In addition new logging gaps were detected from the LandSAT imagery and ground surveys." The locations of the new logging gaps are not contained in the MR as well as preventative or curative measures. Preventative and curative measures for older logging gaps not noted in MR because they are assumed long established. Verifiers noted from the site visit that the source of the number of logging gaps in "Rimba Raya_2013_2014_M3.xlsx", tab "TimberExtraction2010_14" column L. 208 actual # of logging gaps detected are actual trees removed.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Per this requirement, please report in the MR the general locations of logging gaps for this monitoring period. Please also note preventative or curative measures if any, implemented.

Round 1 Response from Project Proponent (18 April 2015)	A map indicated the location of the detected logging gaps within the Project Area was added to Section 6.2.1 of the Monitoring Report. Additionally the following text relating to preventative / curative measures taken was also added to this section: 'Upon discovering the logging activity in the southern unit the Rimba Raya patrol team informed the loggers of their illegal activity and moved them out of the Project Area. The temporary rails and bridges were destroyed to prevent re-entry and patrols were increased in this region as a precautionary measure.'
ESI Findings - Round 2 (27 May 2015)	Logging gaps established during this reporting period are now appropriately presented in the MR as a figure. Preventative measures are described under Step 3 and are also implemented as part of regular forest patrols explained in the MR and observed during the on-site assessment. The item is addressed.

Item Number	10
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	•Two different strata may become similar enough to allow their merging into one stratum.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Site visit observations
ESI Findings - Round 1 (27 February 2015)	Several classes are close in spectral characteristics in Landsat imagery, including shrubland and wetland for instance. Only if change was detected in the spectral differences between years for the cover type was a change area assigned. During the site visit, the verifier noted several classes that were incorrectly typed and discussed with the PP on-site. A detailed finding request related to these issues will not be submitted here until receipt of accuracy assessment materials. However, distinguishing between land cover types on peatland soils is high risk for accounting.
Round 1 NCR/CL/OFI (27 February 2015)	NCR: Please assert some of the methods employed by the project for ensuring that stratification is being performed accurately for peatland soil land cover types.
Round 1 Response from Project Proponent (18 April 2015)	this year, as with past years, peat swamp forest was classified with a very high accuracy (producer accuracy always 100%, user accuracy: 96.7% in 2010, 93.3% in 2012, 92.3% in 2013). In the non-forest classes, there is no discrimination made between peat soil and non-peat soil.

ESI Findings - Round 2 (27 May 2015)	Verifiers reviewed materials submitted (accuracyassessment_2010-2014_final.xls) at this round for an accuracy assessment of stratification of land cover types. 139 ground reference points were taken. Though 50 points per class are recommended, time and logistical constraints in the project make this difficult, and so this is sufficient. A confusion matrix and kappa statistic were generated correctly. However, verifiers request the coordinates or file of the spatially explicit ground reference points for viewing over imagery and classification results.
Round 2 NCR/CL/OFI (27 May 2015)	CL: Please supply the geospatial file of ground reference points used in generation of the accuracy assessment for classification.
Round 2 Response from Project Proponent (30 June 2015)	The spatial files requested were provided in response to this finding. For the 2014 classification, 139 geotagged photos as field reference data for validation were available. These photos were classified and assessed by experts and then compared to the classification. Again a confusion matrix was established comparing the classification result with the reference samples, and the overall classification accuracy, as well as the accuracy of the individual classes (producer's and user's accuracy) was calculated."
ESI Findings - Round 3 (10 July 2015)	Verifiers reviewed accuracy assessment points overlain on PP supplied Landsat imagery and agree with classification assignments. Low, sparse vegetative cover is difficult to assess in the imagery from shrubland in some areas, important for distinguishing peatland soil type. However, classifications are reasonable and in best practice. Further, verifiers reviewed the results of the accuracy assessment and found all entries to be correct. The item is addressed.

Item Number	11
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	Monitoring land use change within the project boundary must occur to ensure that any GHG benefits achieved by project activities during the crediting period are real, permanent and secure. Within the project boundary, three sources of emissions will lead to significant reductions in project benefits (Eq. 89 & 90):
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Rimba Raya_2013_2014_M3.xlsx
ESI Findings - Round 1 (27 February 2015)	Equation 90 was applied incorrectly where emissions were not computed according to strata.
Round 1 NCR/CL/OFI (27 February 2015)	NCR: Please address the findings and compute Equation 90 according to strata.
Round 1 Response from Project Proponent (18 April 2015)	Equation 90 was computed according to strata on tab 'SummaryMonitoringEmissions'.

ESI Findings - Round 2 (27 May 2015)	Equation 90 was applied correctly. However, inconsistent decimal places were applied to deforestation (1, cells I9-I10 in tab "Deforestation2013_2014")/logging and fire. Verifiers suggest carrying decimal places from GIS computations, but there is no explicit VCS requirement. Though this finding is not directly related to Equation 90, it applies to the outcome.
Round 2 NCR/CL/OFI (27 May 2015)	CL: Please consistently apply decimal places for areal computations of the monitored parameters used in Equation 90.
Round 2 Response from Project Proponent (30 June 2015)	The PP note that as this is not a requirement of the methodology and that this CL should be noted as an OFI as it is good practice to consistently apply numbers of decimal places in calculations. The spreadsheet has been updated to apply 1 decimal place for all areal parameters including those use in the Equation 90 computation. Note that this change made no material difference to the estimates.
ESI Findings - Round 3 (10 July 2015)	Areas are fine and this request could have been suggested as an OFI, though verifiers note that market leakage areas are reported without any decimal places. However, verifiers note that shrubland stratum for canal 2 in Table 14 is reported wrong as well as the total values. Further the MR Section 6.2.1 values for "The total area of peat soil impacted per year was determined " and "The total emissions from logging canals in the project area was subsequently estimated to be " and "The total emissions attributable to logging in the Project Area was determined to be" are reported wrong in the MR. Please note verifiers inserted this finding here to avoid opening a new requirement elsewhere and to facilitate easier audit tracking.
Round 3 NCR/CL/OFI (10 July 2015)	CL: Please fix the noted reporting errors in the MR to align with computed values in the monitoring calc worksheet.
Round 3 Response from Project Proponent (16 July 2015)	The area figures for canal 2 in Table 14 have been corrected. All figures presented in Section 6.2.1 have been corrected to align with the values in the monitoring calculator spreadsheet. These changes have been made in track to facilitate ease of review.
Final ESI Findings (19 July 2015)	Changes were confirmed correct and applied to the MR. The item is addressed.

Item Number	12
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	The monitoring methodology was designed to enable project participants to estimate an average emission factor per logging gap prior to the start of the project if desired; thus the only monitoring that is necessary over the crediting period is to detect the number of logging gaps and area of new peat drainage present within the project boundary in a given year t. (See Eq. 91)
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR Section 5.3, 6.2.1, Rimba Raya_2013_2014_M3.xlsx
ESI Findings - Round 1 (27 February 2015)	This equation was applied correctly. The parameter "CO2 emissions from peat drainage in stratum i at time t, t CO2-e" is not needed as no peat was drained from the illegal logging area. Parameter Ngaps, "number of logging gaps detected in stratum i, time t in the project area" in Section 5.3 of the MR appears to denote monitoring activities dating to the previous monitoring period. LIDAR is mentioned as a method of detection but not mentioned in Section 6.2.1 of the MR.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please confirm and update the dates of monitoring activities listed in the parameter table. Please also note which Methodology Equation is relevant, as it is missing. Please also assert whether LIDAR data was available and remove the reference if it was not.
Round 1 Response from Project Proponent (18 April 2015)	Within the parameter table in Section 5.3, information pertaining to parameter Ngaps was updated to reflect the monitoring activities that are applied, and the reference to LiDAR was removed as the technology was not applied. With regard to listing the relevant Methodological Equation, the parameter tables from the VCS/CCB template were used and there is no specific requirement to list the relevant methodological equation.
ESI Findings - Round 2 (27 May 2015)	Verifiers concur there is no specific requirement to list methodology equations. Description of elements for NGapsP, it are sufficient to address this request. The item is addressed.

Item Number	13
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	An average emission factor (EFlogging,i) for each stratum can be derived prior to the start of project activities or before the first monitoring event by collecting field measurements in recent logging gaps in the project region. (See Eq. 92)

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR Section 6.2.1, Rimba Raya_2013_2014_M3.xlsx
ESI Findings - Round 1 (27 February 2015)	The average emission factor (EFlogging,i) as noted in Section 6.2.1 is missing from the data and parameters section. Section 6.2.1 of the MR states "In accordance with the methodology the Logging Gap Emissions Factor was estimated at the beginning of the project and is described in the validated Monitoring Plan." Verifiers were unable to locate the logging gap emission factor in the validated PD monitoring plan. Equation 92 has not been followed correctly. It includes "Non-extracted Biomass Carbon (t C)", and values of C extracted and damaged are not divided by number of logging gaps in quantification. A cell notes "see "Logging gap data Mawas calculation sheet 23jun08-1" but this evidence has not been supplied. Strata shrubland and peatland forest employ the same emissions factor though they are different. Methods for determination of EFlogging,i within the monitoring calc worksheet suggest a methodology deviation may be required. Equation 92 allows the inclusion of average carbon extracted as timber per logging gap k in stratum i, and average carbon damaged as a result of logging per logging gap k in stratum i. There is an extra term included in the calculation of EFlogging,I, in spreadsheet for "Non-extracted Biomass Carbon (t C)".
Round 1 NCR/CL/OFI (27 February 2015)	NCR: Per the findings, please include this parameter in the appropriate section of the MR and note the value applied. Please supply evidence supporting the use of a validated average emission factor for this verification. Otherwise, please follow equation 92 according to the methodology.
Round 1 Response from Project Proponent (18 April 2015)	The logging gap emission factor can be found on the validated excel spreadsheet (provided with this response) as well as the tab (Timber Extraction 2010_2014) of the spreadsheet for this monitoring period. The parameter and the value applied is listed in Section 5.2 of the MR.
ESI Findings - Round 2 (27 May 2015)	The parameter EFLogging is appropriately included in Section 5.2 of the MR and the source is stated as "Validated Project Design documents and based on data from Winrock study of Mawas Conservation Area which is in the proximity of the Project Area and upon which the methodology was developed." Verifiers could not locate the source within validated materials but the value applied (1.5) is adjusted in the same manner fro Mawas data as previous validation/verifications. The item is addressed.

Item Number	14
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	At each monitoring event, use aerial photographs or other aerial imagery or high resolution remote sensing data to monitor the number of tree gaps present in the project area. Imagery should be collected annually. At the time the imagery is collected, it is conservative to overestimate the number of gaps by assuming that all gaps are caused by commercial logging and not by natural treefall. The canopy gaps detected during each monitoring event will most likely be from the past year's logging activities; if there is uncertainty about whether a gap was formed during the year the monitoring is taking place or from a previous year, this gap should be included in the count because it is conservative to overestimate the number of trees logged.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Remote sensing meeting, Open_area_IL.SHP, RimbaRaya_2014_Mosaic_final.tif
ESI Findings - Round 1 (27 February 2015)	During the project verification site visit, new tree gaps were visited from logging during the monitoring period and had been measured by field crews. The requirement here is that aerial photos, imagery or RS data needs to be used at each monitoring event to detect all logging gaps. Shapefiles or similar from logging gaps detected by Landsat in the current monitoring period were provided. Evidence of the new logging gaps was not identified in the 2014 Landsat mosaic as they were visited by field crews.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please explain whether field patrols are capable enough and would be able to comprehensively detect logging gaps more accurately than imagery. If sufficient imagery was unavailable to monitor tree gaps per this requirement, please note the methodology deviation in the MR, noting specifically the steps of 19.2.1.3 performed differently.
Round 1 Response from Project Proponent (18 April 2015)	
ESI Findings - Round 2 (27 May 2015)	No response was provided and therefore the finding request is re-issued.
Round 2 NCR/CL/OFI (27 May 2015)	CL: Please explain whether field patrols are capable enough and would be able to comprehensively detect logging gaps more accurately than imagery. If sufficient imagery was unavailable to monitor tree gaps per this requirement, please note the methodology deviation in the MR, noting specifically the steps of 19.2.1.3 performed differently.

Round 2 Response from Project Proponent (30 June 2015)	Logging gaps are generated from the removal of trees from illegal loggers. Illegal loggers access the site via existing canals or along roads along the southern boarder of the Project Area. Access is made very difficult in the dry seasons due to the inaccessibility of the site. The logging gaps detected in this Monitoring period were detected both via field monitoring which enabled the illegal loggers to be removed and extraction terminated, as well as with the Landsat images obtained at the end of the monitoring period. the project relies on both field crews and remote sensing. The Project Management team have increased the number of people on the ground conducting the field patrols and working with communities to remove and deter illegal loggers from the Project Area. The field crews do this by having frequent patrols along access areas including existing small canals and the road in the southern buffer zone boundary as well as engaging the community and increasing their understanding of the importance of maintaining and enhancing the tree cover in the project area. To reduce the problems with utilising optical satellite data in cloud persistent areas, the Project has actively sort to participate in a trial using radar data from the new Sentinal satellite and is a priority area for image collection. The availability of this higher resolution radar data combined with ground patrols should allow improved monitoring of logging gaps in the future. The Project does not consider that a deviation to the monitoring plan took place as satellite data was used (in conjunction with the ground surveys to measure the tree stumps as required by the methodology).
ESI Findings - Round 3 (10 July 2015)	Verifiers accept this response as sufficient to capture detectable logging gaps during the monitoring period. It is clear that timely acquisition of imagery is challenging and so the project has supplemented monitoring of this element through regular field patrols which were observed on-site. No deviation here is necessary. The item is addressed.

Item Number	15
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	A minimum gap size threshold shall be determined and documented in the first monitoring year to ensure a standardized count of logging gaps throughout the crediting period.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR Section 6.2.1
ESI Findings - Round 1 (27 February 2015)	208 logging gaps detected in current monitoring according to Rimba Raya_2013_2014_M3.xlsx. However, it is not stated in the monitoring report that logging gaps correlate to individual trees harvested. As noted in the requirement, this would have been established in the first monitoring year.

Round 1 NCR/CL/OFI (27 February 2015)	CL: To guide the reader of the monitoring report, please state that logging gaps are equivalent to trees harvested.
Round 1 Response from Project Proponent (18 April 2015)	Clarification on the definition of logging gaps was provided in a number of locations within the MR including; Section 5.2 in the LDF and PMP parameter tables. Section 5.3 in the Ngaps parameter table, in the parameter list of Equation 91 on page 67 and finally in the text of Section 6.2.1, Step 1 on page 68.
ESI Findings - Round 2 (27 May 2015)	Clarifying language of the definition of logging gaps is now appropriately included in the MR. The item is addressed.

Item Number	16
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	Step 6. In a GIS, construct a buffer width on each side of the canal network mapped in Step 3 that is equal to the conservatively-defined distance of impact determined in Step 5. Calculate the total area of the resulting polygon created in the GIS. This area shall be defined as the area of peat impact of logging canals in each stratum i at time t.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Rimba Raya_2013_2014_M3.xlsx
ESI Findings - Round 1 (27 February 2015)	Canal buffers were assessed at the last verification, but there is a transcription error for canal 2.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please fix the noted area discrepancy for the canal.
Round 1 Response from Project Proponent (18 April 2015)	This discrepancy has been corrected with the correct version of the spreadsheet being provided. Please see tab 'LoggingDrainage_2013_2014.'
ESI Findings - Round 2 (27 May 2015)	Buffered canal areas for drainage impacts are now correct in the calc worksheet. The item is addressed.

Item Number	17
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	The sampling plan for estimating average drainage depth shall be outlined in the monitoring report.

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR General
ESI Findings - Round 1 (27 February 2015)	Sampling plan for estimating average drainage depth was not included in the MR.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please address the findings and add the noted sampling to the MR following this requirement.
Round 1 Response from Project Proponent (18 April 2015)	No sampling of drainage depth was required for this monitoring period as there were no drainage activities detected and therefore a sampling plan was not required to be generated this monitoring period.
ESI Findings - Round 2 (27 May 2015)	Verifiers agree with the PP assertion as drainage depth was sampled and outlined at the previous verification. The item is addressed.

Item Number	18
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	All fires that occur inside the project boundary must be accounted for over the life of the project, along with the associated GHG emissions resulting from these fires. The GHG emissions attributable to fires that occur within the project boundary over the monitoring period are therefore estimated using Eq. 109.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Rimba Raya_2013_2014_M3.xlsx, burned2014_projectarea.shp, classification_2014_final_projectarea.shp
ESI Findings - Round 1 (27 February 2015)	Equation 109 was not correctly applied as it needs to be computed according to strata. However, the area burned in stratum i, time t in the project area hectare values is incorrect. The file "burned2014_projectarea.shp" shows 3,881 ha have burned in the monitoring period - most of which was shrubland and wetland classes.
Round 1 NCR/CL/OFI (27 February 2015)	NCR: Please fix the noted error in the parameter area burned in stratum i, time t in the project area ha and compute according to strata.
Round 1 Response from Project Proponent (18 April 2015)	Equation 109 is now correctly applied such that emissions are calculated according to strata, Additionally the actual areas burnt have been updated and now sum to 3881 ha.
ESI Findings - Round 2 (27 May 2015)	There appears to be some confusion on which burnt area spatial file is correct. The PP provided updated burn area files (LandCoverClassification_Fire2014.shp) which are used in quantification of both AG and peat burn emissions and total to 343 ha. Previously, other files were issued (burned2014_projectarea.shp), which offer a drastically higher estimate of burnt areas within the carbon accounting area, and total 3881 ha. The latest burnt area shapefile agrees with verifier area computations, and in the calc worksheet, the PP has chosen to go to 2 decimal places for burnt areas.

Round 2 NCR/CL/OFI (27 May 2015)	CL: Please explain the reason for differing burnt areas per the finding and justify use of the smaller burnt area.
Round 2 Response from Project Proponent (30 June 2015)	The initial burnt area file was found to have errors caused by haze in the imagery. This same haze caused some errors in the land cover classification. Later clearer images were collected and used to improve the accuracy of the land cover and burn area assessment and this explains the use of the updated burnt area file. The accuracy assessment conducted for the burnt area shapefile and the land cover shapefiles, provided in response to other findings during the verification, confirm the accuracy levels associated with the classified images and justify their use.
ESI Findings - Round 3 (10 July 2015)	Verifiers accept this response for improvements to the burnt area detection analysis. Accuracy assessment of the burnt areas as related to burnt area geographic size for the reporting period are requested in a later finding. This item here is addressed.

Item Number	19
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	If burned areas are detected within the project boundary or within a 1 km buffer of the project boundary in the monitoring year, then georeferenced, high resolution aerial imagery or georeferenced ground measurements shall be collected over these areas and the location and area of all fire scars shall be calculated and recorded. The area of burning should be tracked directly using an accuracy assessment criterion of 80% or more.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Site visit observations
ESI Findings - Round 1 (27 February 2015)	Field visit confirmed burn sites for the 2013-2014 monitoring period, and areas detected as burnt were reasonable. The speed of vegetation reestablishment post-fire on peat is remarkably fast, and ensuring timely detection from limited imagery is difficult. Vegetation composition post-fire of ferns may facilitate detection. However, no accuracy assessment provided yet. PP indicated that accuracy will be assessed in later version of MR.
Round 1 NCR/CL/OFI (27 February 2015)	NCR: Please provide the accuracy assessment of burnt areas per this requirement.
Round 1 Response from Project Proponent (18 April 2015)	
ESI Findings - Round 2 (27 May 2015)	No response was given for this request therefore it is re-issued again. This criteria does not explicitly require an accuracy assessment for classification of burnt areas, but justification is needed for omission.

Round 2 NCR/CL/OFI (27 May 2015)	CL: Please provide the accuracy assessment of burnt areas per this suggested requirement. Otherwise, please justify appropriateness of omitting it.
Round 2 Response from Project Proponent (30 June 2015)	Spatial files indicating the location of the field points used in the accuracy assessment as well as photos collected at a sub-set of the points visited were provided in response to this finding. The shapefile "burn_scars_acc_assessment_2014.shp" includes the points for burn scar accuracy assessment for 2014. The shapefile "classification__acc_assessment_2014.shp" includes the points used for the accuracy assessment for the 2014 classification. For the burn scar accuracy assessment in-situ validation data was utilized. For 2014 a total number of 195 geotagged field photos within areas classified as "burned area" in 2014 were assessed. Due to the overlap of single photos (taken at the same spot but into different directions for better interpretation), 35 points for validation remained. Furthermore, 4 of these points were deleted because an interpretation was not possible. This is a result of the large time difference between the classification and the field survey for the validation data (7 to 8 month). Finally, based on the previously mentioned facts, 31 points remained for the accuracy assessment. These validation points were visually assessed by experts, resulting in a user's accuracy of 96.8%.
ESI Findings - Round 3 (10 July 2015)	Verifiers examined the files "burn_scars_acc_assessment_2014.shp" and "LandCoverClassification_Fire2014.shp" which form the basis for the burnt area accuracy assessment and hectares for quantification of burn emissions during the reporting period. Of the 31 ground reference points for burnt areas, 21 fell on detected burnt areas within the CCA, 9 ground reference points (minus 1 which was misclassified) have accounted for burnt areas within the CCA 3km buffer. There are parcels in the south-central portion of the CCA (visible in RimbaRaya_2014_Mosaic_final.tif) where burnt areas appear to be unaccounted for but without closer inspection it is likely these parcels burned in the previous reporting period. Verifiers also reviewed photos submitted and confirm that locations were recently burned during the reporting period. Ground reference point ID-4 photos suggests it may have burned during the reporting but the call was fine. The accuracy assessment requires an error result of 80% or greater despite burnt emissions are only accounted for on peatland soils. Here the accuracy assessment requirement is applied to burnt or not and it appears from evidence provided that the accuracy has been met. On 07 July 2015, the verifier provided an example of burnt areas which appear undetected by the project in the form of a .pdf screenshot of the burnt area accuracy assessment points and existing burnt polygons overlain on the 2014 mosaic Landsat imagery provided by the PP. Verifiers note that shrubland in year 2013 for peat burn (Epfire) is not accounted for in monitoring calcs, Equation 109 in tab "Summary MonitoringEmissions." Although Equation 109 was not implemented exactly as the methodology, the result is the same for biomass burning and peat burn factors. However, there is a discrepancy in acreages between biomass burn and peat burn for the reporting period (both years).

Round 3 NCR/CL/OFI (10 July 2015)	CL: Please include peat burn for year 2013 in the monitoring calcs and rectify the differences in hectares between biomass burning and peat burn calcs for the entire reporting period. In an email addressed to the PP on 08 July 2015, verifiers requested the burnt area classification shapefile. Upon receipt, this finding may be closed but pending review of burnt areas within the buffer (3km).
Round 3 Response from Project Proponent (16 July 2015)	Three burnt areas shapefiles were provided again in response to this finding; specifically the burnt area within the project area, the burnt area within the project area and buffer zone and the burnt area within the project area clipped to the project area land cover file. The areas used in the calculation spreadsheet match the areas presented in the burnt area landcover file.
Final ESI Findings (19 July 2015)	Areas for peat burn were applied correct in computations in the newly submitted monitoring calc worksheet. The verifier noted a date in the monitoring calc worksheet in error and no change was required. The item is addressed.

Item Number	20
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	If no field measurements are available of carbon stocks in stratum i after burning, then the CO2 emission factor for biomass burning in stratum i should be conservatively estimated as the CO2 equivalent of the mean baseline aboveground carbon stock of the stratum in which fire was detected (Eq. 114, 115 & 116).
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Rimba Raya_2013_2014_M3.xlsx, and VCS CCB Monitoring Implementation Report-M3_V1.2.pdf (section 6.2.2.1)
ESI Findings - Round 1 (27 February 2015)	This calculation for equations 115 and 116 are performed in the monitoring calculation spreadsheet on Tab “ABBiomassBurn2014”, column F and H. Verifiers checked the application of these equations and they appear to be performed correctly following the methodology. However, the calculation for equation 114 is performed in the monitoring calculation spreadsheet on Tab “ABBiomassBurn2014”, column F. The equation for implementation for 114 includes extra terms for CE = 0.5 and proportion burnt = 1, and is not implemented as written in VM0004. It appears these extra terms should be included in equation 114 as they are included in 113 and this in an oversight in the methodology as written. VCS clarification can be requested if this is a confirmed error in the methodology. The Global Warming Potential values for N2O and CH4 may need to be updated as the "first commitment period" has expired.

Round 1 NCR/CL/OFI (27 February 2015)	CL: Please clarify the use of the extra terms of equation 114 as performed in the monitoring calculation spreadsheet on Tab "ABBiomassBurn2014", column F. Please also update the Global Warming Potential values for N2O and CH4 if warranted. ESI is willing to accept guidance from VCS (or seek guidance from VCS) on this issue, if necessary.
Round 1 Response from Project Proponent (18 April 2015)	The updated spreadsheets notes that Equation 114 performed in the monitoring calculation spreadsheet on Tab 'ABBiomassBurn2014' should actually be applied as described in Equation 112. We note that this is a mistake in the methodology and the project has always calculated its emissions from burning with this correction to Equation 114. The GWP potentials were updated in the last monitoring period following direction from ESI. The submission of the correct version of the spreadsheet following round one findings has addressed this issue.
ESI Findings - Round 2 (27 May 2015)	Application of equation 112 follows Approved VCS Methodology VM0004 Version 1.0, and the equation used is clearly indicated in Row F of the "ABBiomassBurn2014" tab of the monitoring calculation spreadsheet. The GWP values applied have been corrected. However, Section 5.2 of the monitoring report needs to be updated to reflect these GWP (i.e., CH4 = 25, and N2O = 298).
Round 2 NCR/CL/OFI (27 May 2015)	CL: Please update Section 5.2 of the monitoring report to reflect revised GWP values (i.e., CH4 = 25, and N2O = 298).
Round 2 Response from Project Proponent (30 June 2015)	The various locations referring to the GWP values within the Monitoring report, including the tables in Section 5.2, were updated to report the correct GWP values applied in the calculations.
ESI Findings - Round 3 (10 July 2015)	All locations referring to the GWP values within the Monitoring report, including the tables in Section 5.2, were updated to report the correct GWP values applied in the calculations (i.e., CH4 = 25, and N2O = 298). The item is addressed.

Item Number	21
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	Step 2b. Estimate emission factor for peat burning (see Eq. 117, 118, 119 & 120)
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Rimba Raya_2013_2014_M3.xlsx, and VCS CCB Monitoring Implementation Report-M3_V1.2.pdf (section 6.2.2.2)

ESI Findings - Round 1 (27 February 2015)	The calculation for equations 117, 118, 119, and 120 are performed in the monitoring calculation spreadsheet on Tab "PeatBurn" column D,E,F,G row 38. Verifiers checked the application of these equations, and equation 119 does not follow the methodology. Equation 117 may not be correctly named in the calculation spreadsheet. These equations also should be computed according to strata.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please correct the use of equation 119, cell (F:38) in the monitoring calculation spreadsheet on Tab "PeatBurn" and describe how this produces the same results as equation 119 of VM0004 as its written, or please correct the use of this equation to match the methodology. Please correct the naming of row G (35 - 39), as it is currently labelled as equation 109, and appears to be equation 117 of VM0004. Please also compute the emission factors according to strata.
Round 1 Response from Project Proponent (18 April 2015)	All issues raised for clarification have been address with the submission of the correct version of the calculation spreadsheet
ESI Findings - Round 2 (27 May 2015)	All clarification items have been addressed in (Rimba Raya_M22013_2014V1.0.xlsx). Equation 119 is now applied following the methodology and is divided up by strata. However, there is an error in the formula for equation 119 for the year 2014 (see peat burn tab, cells: I54, and I56).
Round 2 NCR/CL/OFI (27 May 2015)	CL: Please fix the formula error for Equation 119 located in (Rimba Raya_M22013_2014V1.0.xlsx), peat burn tab, cells: I54, and I56.
Round 2 Response from Project Proponent (30 June 2015)	Cell references for Equation 119 were corrected to ensure the correct GWP potential multiplier was referenced.
ESI Findings - Round 3 (10 July 2015)	Rimba Raya_M3_2013_2014V2.0.xlsx has been updated and corrected for Equation 119 located in the, peat burn tab, cells: I54, and I56 (to ensure the correct GWP potential multiplier was referenced). The item is addressed.

Item Number	22
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	The depth of peat burned per fire shall be measured in the field or conservatively estimated based on literature values49. If literature values are used, verification shall be conducted using limited ground sampling to ensure the actual burn depths measured fall within the uncertainty range of the literature value applied.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Rimba Raya_2013_2014_M3.xlsx, and VCS CCB Monitoring Implementation Report-M3_V1.2.pdf (section 6.2.2.2)

ESI Findings - Round 1 (27 February 2015)	The depth of peat burn appears to have been conservatively estimated based on literature values as allowed by the methodology. The conservative upper end of the range reported in literature (i.e. 55cm) was applied. As literature values were applied, verification of this value was undertaken to meet the requirements of the methodology. The methodology allows a verification approach using peat burn depth collected from a limited number of locations to ensure the actual burn depths measured fall within the uncertainty range of the literature value applied. These limited number (9) of ground points found that peat burn depth did not exceed 10cm. It is unclear what the uncertainty range of the literature value applied is, but the value used appears to be conservative based on the validation carried out.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Although the same value was used at the last verification event, verifiers have noted part of the rule appears to not have been demonstrated at that time. Please provide evidence that the actual peat burn depths measured (10cm) falls within the "uncertainty range of the literature value applied" (55cm), or justify a methodology deviation in the MR, following Section 3.5.1 of the VCS Standard.
Round 1 Response from Project Proponent (18 April 2015)	The literature value applied for peat burn depth was taken from the methodology which states in footnote 49 on page 83 'Based on a literature review in Couwenberg et al. (2009), the peat depth burnt in peat fires averages 34 cm across six studies from 1988 to 2002. A conservative value for burn depth would be the upper end of the range reported, which is 55 cm.' This paper reports the average to be 34cm with a range from 12-55cm. This range is not reported as an uncertainty range but rather the averages of a range of measurements taken over 6 measurement years. If the full range of measurements taken is considered burn depths varied from 0 - 150cm. The 10cm burn depth is within the absolute ranges of and slightly lower than the lower average figure (12cm). In any case applying 55cm is conservative as noted by the methodology. The following clarification is provided in the updated Section 6.2.2 - The average measured burn depth in the project area (10cm) is lightly lower than the lowest value in the range (12 - 55cm) reported in the literature, demonstrating that the application of 55cm is conservative.
ESI Findings - Round 2 (27 May 2015)	Clarifying text has been added to section 6.2.2, and the response demonstrates that the actual peat burn depths measured (10cm) falls within the "uncertainty range of the literature value applied" 0 - 150cm. The item is addressed.

Item Number	23
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	The GHG emissions attributable to deforestation that occur within the project boundary over the monitoring period are therefore estimated using Eq. 121.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR General
ESI Findings - Round 1 (27 February 2015)	Section 6.5.3 of the MR notes "Emissions related to fire were estimated to be " which appears to be a typo. Further, the superscript for the parameter within the heading should state "LCC" per equation 121 of the methodology.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please fix the stated typos in the finding.
Round 1 Response from Project Proponent (18 April 2015)	Editorial changes have been made as requested to Section 6.5.3.
ESI Findings - Round 2 (27 May 2015)	Changes were confirmed to have been made to Section 6.5.3 of the MR. The item is addressed.
Round 2 NCR/CL/OFI (27 May 2015)	
Round 2 Response from Project Proponent (30 June 2015)	
ESI Findings - Round 3 (10 July 2015)	Verifiers re-opened this finding upon discovery of a calc error in Equation 121 in the "Summary MonitoringEmissions" tab of the monitoring calc worksheet where elements are being double counted from the deforestation tab.
Round 3 NCR/CL/OFI (10 July 2015)	CL: Please fix the stated calc error in the finding.
Round 3 Response from Project Proponent (16 July 2015)	The double counting of deforestation emissions on the 'SummaryMonitoringEmissions' tab has been rectified.
Final ESI Findings (19 July 2015)	This correction was confirmed to have been made correctly in the monitoring calc worksheet. The item is addressed.

Item Number	24
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	The location and area of all land cover change shall be calculated and recorded in monitoring year t based on georeferenced aerial imagery or other remote sensing data. The area of land cover change should be tracked directly using an accuracy assessment criterion of 80% or more. It is conservative to assume that the area of peat affected by land cover change is equal to 100% of the converted area.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR General, site visit
ESI Findings - Round 1 (27 February 2015)	No accuracy assessment or confusion matrix provided yet for the final stratification. During the site visit, verifiers observed continued work to gather ground reference photos for purposes of the accuracy assessment. A weighted kappa coefficient would be useful to evaluate agreement between map classes. A statement within the MR is also needed to clarify whether a conservative assumption for peat conversion was considered, as allowed by the requirement.
Round 1 NCR/CL/OFI (27 February 2015)	NCR: Please provide the accuracy assessment and weighted kappa coefficient for the 2014 classification. Please also state in the MR whether peat conversion was considered as noted in the finding.
Round 1 Response from Project Proponent (18 April 2015)	139 geotagged photo location were used for the accuracy assessment for the classification and ended up with an accuracy 87.1% (kappa = 0.85) for the 2014 classification and 96.4% for the forest-non-forest classes. Therefore, we ended up in a deforestation accuracy from 2013-2014 of 90.38%. The file titled 'accuracy assessment.xlsx presents the figures and calculation steps. As a result of this accuracy assessment the land cover statistics and the change numbers were adjusted and can be found in the files titled 'LC statistics.xlsx provided in response to this NCR. The MR and associated calculation spreadsheet were updated accordingly.
ESI Findings - Round 2 (27 May 2015)	The area of deforestation conservatively accounts for all strata deforested per VM0004 and is illustrated in Table 16 in the MR. As part of review of the accuracy assessment, verifiers request a randomly selected subset of 20 of the geotagged photos for the ground reference locations. A request for geospatial file of the ground reference points was made elsewhere in this audit.
Round 2 NCR/CL/OFI (27 May 2015)	CL: Please provide a randomly selected subset of 20 of the geo-tagged ground reference photos used in generation of the accuracy assessment.
Round 2 Response from Project Proponent (30 June 2015)	A randomly selected subset of 20 geo-referenced photos were provided in response to this finding.

ESI Findings - Round 3 (10 July 2015)	Verifiers reviewed the photos supplied for generation of the accuracy assessment and conclude cover classifications are reasonable. CF03-017 and CF03-023 suggest they could be peat swamp forest instead of coastal forest. The item here is addressed.

Item Number	25
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	Step 6. Estimate average land cover change emission factors (aboveground and peat) for each stratum. (See Eq.122, 123, 124.)
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Rimba Raya_2013_2014_M3.xlsx
ESI Findings - Round 1 (27 February 2015)	The A(LCC) at northern buffer reports incorrect areas in hectares as part of computations for equation 124. Equation 122 is incorrectly using the previous monitoring period deforestation data. Other errors in quantification of these equations noted but verifiers note that wrong worksheet was submitted for this Round of finding requests. Equations in Step 6 will differ as a result of these changes.
Round 1 NCR/CL/OFI (27 February 2015)	NCR: Please address the findings and correct the noted quantification errors.
Round 1 Response from Project Proponent (18 April 2015)	Whilst the submission of the correct version of the spreadsheet has rectified most of the issues related to the calculations, the response to this NCR is that the A(LCC) data remains the same between this monitoring period and the previous one because emissions from drained peatland must be accounted for annually the remainder of the Project life. As there was no additional draining detected in the monitoring period currently under verification, the area A(LCC) remained the same as last monitoring period.
ESI Findings - Round 2 (27 May 2015)	The buffered canal areas (ALCC) are now correctly used in computations in the monitoring calc worksheet for peat emissions due to drainage from the northern encroachment at the last verification. This item is addressed.
Round 2 NCR/CL/OFI (27 May 2015)	
Round 2 Response from Project Proponent (30 June 2015)	

ESI Findings - Round 3 (10 July 2015)	Verifiers re-opened this finding upon discovery of an incorrect area for parameter A(LCC) Northern Buffer of deforestation occurring at the northern boundary during the previous monitoring period. Peat swamp forest stratum here does not reflect the shapefile "Deforestation_EffectedCCAArea.shp." Also, verifiers note that the value for peat depth of drainage is set to 60 instead of 55 as noted in the MR and used for monitoring calcs at the previous verification. The PD does not suggest a value for parameter DLCC, drain,it on page 71.
Round 3 NCR/CL/OFI (10 July 2015)	CL: Please fix the incorrect area for peat swamp forest in parameter A(LCC) noted in the finding. Please also explain use of a drainage depth value of 60 instead of 55 as used previously.
Round 3 Response from Project Proponent (16 July 2015)	The area of peat swamp forest deforested in the previous monitoring period was corrected from 56.6 ha to 53.6 ha to be consistent with the shapefile 'Deforestation_EffectedCCAArea.shp'. The depth of drainage impact is correctly listed as 60cm. This was the figure applied last verification period and is based on field measurements and reported in the field report generated last verification period following the drainage event. Whilst this report states that the average drainage depth recorded was 41cm it also points out that the project has conservatively applied the deepest recorded depth of 60cm. Additional information has been provided in the data tables listed in Section 3.4. There has been no changes to the calculation spreadsheet in response to this finding as the values were correct and consistent with previous verification events.
Final ESI Findings (19 July 2015)	Incorrect area for peat swamp forest was correctly updated in the newly submitted monitoring calc worksheet. Drainage depth value used is substantiated and no changes were required for that element. The item is addressed.

Item Number	26
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	See Eq. 125.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Rimba Raya_2013_2014_M3.xlsx, and VCS CCB Monitoring Implementation Report-M3_V1.2.pdf (section 6.5.5)
ESI Findings - Round 1 (27 February 2015)	Ex Post Net Anthropogenic GHG Emissions Avoided is calculated in the Monitoring Calculations spreadsheet on the "Summary Project Emissions Table" tab, cell E:9. This calculation was checked by verifiers and appears to follow the equation 125 of VM0004.
Round 1 NCR/CL/OFI (27 February 2015)	

Round 1 Response from Project Proponent (18 April 2015)	
ESI Findings - Round 2 (27 May 2015)	
Round 2 NCR/CL/OFI (27 May 2015)	
Round 2 Response from Project Proponent (30 June 2015)	
ESI Findings - Round 3 (10 July 2015)	Computations for application of Equation 125 were previously confirmed. At the beginning of Section 6.5 in the Round 2 submitted MR contains yellow incomplete reference text with "???." Also, the value for "Em. From biomass burning" in year 5 of Table 13 in the MR has a small transcription error.
Round 3 NCR/CL/OFI (10 July 2015)	CL: Please fix the noted yellow highlighted text in the MR. Please also fix the value for "Em. From biomass burning" in year 5 of Table 13.
Round 3 Response from Project Proponent (16 July 2015)	The text in section 6.5 has been revised to remove the ???. All changes have been made in track to facilitate ease of review. All numbers in the tables and through out the document are now reported consistently with the spreadsheet.
Final ESI Findings (19 July 2015)	All changes have been appropriately made to the MR. The item is addressed.

Item Number	27
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	To estimate the amount of VCUs that can be issued at time t*=t2 (the date of verification) for the monitoring period T = t2 - t1, this methodology uses Eq. 126.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Rimba Raya_2013_2014_M3.xlsx, and VCS CCB Monitoring Implementation Report-M3_V1.2.pdf (section 6.5.5)
ESI Findings - Round 1 (27 February 2015)	The amount of VCUs that can be issued at time t*=t2 (the date of verification) for the monitoring period T = t2 - t1, is calculated in the Monitoring Calculations spreadsheet on the "Summary Project Emissions Table" tab, cell E:9. This calculation was checked by verifiers and appears to follow the equation 125 of VM0004.
Round 1 NCR/CL/OFI (27 February 2015)	

Round 1 Response from Project Proponent (18 April 2015)	
ESI Findings - Round 2 (27 May 2015)	Equation 126 was computed correctly per VM0004. However, verifiers note some discrepancies between values in the current monitoring calc worksheet (tab Summary MonitoringEmissions of "Rimba Raya_M22013_2014V1.0.xlsx") and previous values (tab Summary MonitoringEmissions of "Rimba Raya_M22010_2013V3.xlsx"). Specifically, columns D and E of the previous monitoring period calc worksheet differ from the current. As a result, Net GHG emission reductions or removals (Net VCU Allocation) (tCO2e) for previous verifications differ. While these computations do not apply to crediting for this monitoring period, Section 5 of the Verification Report for this 3rd monitoring period needs to display correct VCU vintages. Verifiers also suggest re-naming the file of the current monitoring calc worksheet to M3 to avoid future confusion. Verifiers noted that Table 20 contains a misplaced comma in the Net VCU Allocation column. Additionally, the values in Table 20 appear to be reported incorrectly and in the wrong place in the table.
Round 2 NCR/CL/OFI (27 May 2015)	CL: Please address the discrepancies in differing values among the monitoring calc worksheets as noted in the finding. Please also fix the noted discrepancies in Table 20 of the MR.
Round 2 Response from Project Proponent (30 June 2015)	
ESI Findings - Round 3 (10 July 2015)	Verifiers note that the Round 2 submitted MR no longer contains older VCU vintages in Section 6.5.5. The previously verified Monitoring Report contained older issuance vintages and the required VCS template guidance language states, "Specify breakdown of GHG emission reductions and removals by vintages where the intent is to issue each vintage separately in the VCS registry system." It is the verifiers understanding that to date it has been the project proponent's intention to receive VCUs from the current verification, suggesting vintages are issued separately and should be reported in this manner.
Round 3 NCR/CL/OFI (10 July 2015)	CL: Please report VCU vintages for all years since first verification in Section 6.5 of the Monitoring Report following the guidance language in the VCS template.
Round 3 Response from Project Proponent (16 July 2015)	Section 6.5 has been updated to include all previous vintages as requested by the verifier. Please note that the previous monitoring period covered all the vintages listed in the monitoring report (i.e. the monitoring period covered 3 years). To avoid confusion already issued VCUs are shaded grey. Those unshaded relate to VCUs generated during the monitoring period covered by the monitoring report (i.e. Jul 2013 - Jun 2014).
Final ESI Findings (19 July 2015)	Early vintages are now appropriately reported in Section 6.5 of the MR. Values are correctly reported. The item is addressed.

Item Number	28
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	See Chapter 11.2. _Quality control (QC) and quality assurance (QA) procedures to be applied to the monitoring process.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Rimba Raya_2013_2014_M3.xlsx, and VCS CCB Monitoring Implementation Report-M3_V1.2.pdf (Section 9.2.1)
ESI Findings - Round 1 (27 February 2015)	Section 9.2.1 describes a thorough QA/QC procedure, which applies to verification of the field data at first verification. This text is not applicable and should be removed.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please address the findings and remove the stated text from the MR. Please also state as a response to this finding why it is not applicable.
Round 1 Response from Project Proponent (18 April 2015)	The text within this section was revised to remove reference to verification of non-applicable data.
ESI Findings - Round 2 (27 May 2015)	Section 9.2.1 has been revised to remove reference to verification of non-applicable data. However, some errors in uncertainty calcs were discovered pertaining to Equation 91, where the wrong year data is being pulled into the formula.
Round 2 NCR/CL/OFI (27 May 2015)	CL: Please fix the error noted for uncertainty in Equation 91.
Round 2 Response from Project Proponent (30 June 2015)	The correct cell from tab 'Timber Extraction 2010_14' is now applied in Equation 91 and subsequently the uncertainty analysis is now calculating correctly for the current monitoring period.
ESI Findings - Round 3 (10 July 2015)	Equation 91 in the tab ExpostUncertianty_2013_2014, now references the correct cell from tab 'Timber Extraction 2010_14'. The item is addressed.

Item Number	29
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	See Eq. 127, 128 and 129.

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Rimba Raya_2013_2014_M3.xlsx, and VCS CCB Monitoring Implementation Report-M3_V1.2.pdf (Section 6.3)
ESI Findings - Round 1 (27 February 2015)	All findings from the last verification that were implemented to fix the calculation of uncertainty (see Rimba Raya_M22010_2013V3.xlsx) were not applied in this version of the calculation spreadsheet. Previous findings are listed below. The source of underlying validated data values (i.e. mean, std. dev. for biomass estimates) are also needed to verify data has been transcribed correctly. **NCR 1 (round 1)**: all of the parameters listed in the monitoring report section 5.3 Table 22 do not appear to be included in the calculation of VM0004 -127 or VM0004 -128 in the calculation spreadsheet. **CL 2 (round 1) :** Calculations do not appear to made for each strata, as is prescribed in the methodology VM0004 -127, what is shown in the spreadsheet as equation 127 appears to be VM0004 -128 **CL 3 (round 1):** Equation VM0004 -122 does not match the calculation spreadsheet on Ex-post uncertainty I J and K 16 (please change notation in spreadsheet to be consistent with methodology. It appears that these cells represent Carbon stock, GHG sources or leakage emission types). This comment also applies to H13 - H19 on Ex-post uncertainty tab. **CL 4 (round 1):** VM0004 -129 does not appear to be explicitly calculated. **CL 5 (round 1):** Please include clear references for all datasets of Parameters for which uncertainty shall be estimated ex-post to validate estimates of mean and standard error for each population.
Round 1 NCR/CL/OFI (27 February 2015)	NCR: Please update the uncertainty calculation methods to be in line with the methodology, including uncertainty expressed at the 90% CL. In doing so, please transparently report all computations originating from validation and ensure that linked data is contained within the same worksheet. Please also ensure that all computational revisions from the last verification are incorporated into the next submission of the monitoring worksheet.
Round 1 Response from Project Proponent (18 April 2015)	The correct version of the spreadsheet, including all computations revisions from the last verification are provided. The uncertainty calculations method is inline with the methodology.

ESI Findings - Round 2 (27 May 2015)	All parameters listed in the monitoring report section 5.3 are included in the calculation of VM0004 -127 or VM0004 -128 in the monitoring calc worksheet. Calculations are now made for each strata, as is prescribed in the methodology VM0004 -127. However, Equation 127 is deriving values from the previous monitoring period incorrectly and is not multiplying UPss by EPss. Equation 129 is incorrect where values for market leakage use the previous verification period acreage in computations for LKME. Verifiers could not follow equation 122 in the calculation worksheet Rimba Raya_M22013_2014V1.0.xlsx (Column D in the SummaryMonitoringEmissions tab). A walkthrough meeting was scheduled on 05/12/2015, and the equation was demonstrated to verifiers in column K of the Deforestation2013_2014 tab (this column was not previously labelled and has been fixed, and the old location was mis named). Verifiers reviewed the revised monitoring calc worksheet and noticed that uncertainty was applied globally across multiple parameters sourced from the land cover change accuracy assessment results. Although this approach was previously verified, extrapolating the accuracy assessment in the case of burnt areas (Equation 109) may not be conservative. No accuracy assessment was provided yet for burnt areas. These uncertainty values may also not be conservatively applied to Equation 107. Equations 109, 121, 112/114, 124, 140 is pulling from the wrong monitoring year for burned emissions. Percent uncertainty for BD is not pulling in additional decimal places for the final step in dividing to achieve a 95% CL as a percentage of the mean.
Round 2 NCR/CL/OFI (27 May 2015)	CL: Please justify extrapolating the land cover change accuracy assessment results for uncertainty of unrelated burnt areas (Equation 109) and logging drainage (Equation 107). MCP needs to be fixed to reflect to reflect project case burning. Please note whether these methods are conservative and transparent following VCS rules. Please fix computations for Equation 127 and where values need to be derived from the current monitoring period. Please fix uncertainty formulae for Equation 109, 121, 112/114, 140. Please use the correct verification period values for computations of market leakage parameter LKME used in Equation 129. Please also explain the source of strata areal values used in LKME computations cells W22:X30. Please use current verification period change detection values. Please carry additional decimal places for the final step of dividing the mean by the 95% CL for uncertainty of BD.

Round 2 Response from Project Proponent (30 June 2015)	The uncertainty values for area of logging drainage was corrected to be 0% as this area was delineated using remote sensing and checked by walking the boundary in the year of drainage (i.e. in the previous monitoring period) . Therefore the determination of the area was conducted with a high level of precision. The uncertainty reported for the burnt areas was adjusted to be consistent with the accuracy assessment of the burnt area. See response to previous findings for details of results. It is the PP opinion that this approach is transparent and is consistent with the methodology approach. All parameters for equations 109/121/112/114/127/129 have been correctly linked to cells relating to the current monitoring period. The values for the market leakage have been corrected to reflect the current monitoring period. Additionally the current land cover areal values were applied in the cells W22:X30.
ESI Findings - Round 3 (10 July 2015)	Project case uncertainty: Parameter MCP, assumed by the verifier as a parameter in Equation 113 (estimated aboveground carbon stock in the baseline scenario before burning for stratum) is still pulling a value from validation biomass estimates. Uncertainty values for ApBurnt should be using the results of the accuracy assessment performed on burnt areas for this monitoring period instead of the land cover accuracy assessment. Parameters for leakage uncertainty are missing per Figure 3 of the methodology. Baseline uncertainty: Required baseline uncertainty parameters are listed in Figure 2 of the Methodology. Verifiers note baseline uncertainty calcs submitted for this round contain an incorrect value for parameter dburn. Baseline uncertainty calcs were noted as retrieved from the validated baseline calculator, but "Baseline Emissions" (cell F27) do not sum to the "Total Gross Co2e Baseline emissions" column H for year 5 in the summary project emissions table. The sum for uncertainty "Biomass Burning" also does not match the value in the summary project emissions table. Parameters pertaining to area utilized the current monitoring period accuracy assessment values, since baseline uncertainty was (should have been) set at validation, a closer approximation to the validation uncertainty should be used here. It is reasonable to use the results of an accuracy assessment for uncertainty of parameters pertaining to area. Some parameters appear to be missing, including aboveground baseline stocks (Equation 14) and potentially others but since some are incorporated into higher level estimates, use of those values may be allowable. During discussions between the verifier and PP on 07 July 2015, it was agreed that the methodology is largely silent on methods for uncertainty application of a given parameter and therefore PP approaches are assessed for reasonability and conservativeness. Since baseline uncertainty is supposed to have been established at validation, and applied consistently at subsequent verifications, it is important to establish a correct value at this time.

Round 3 NCR/CL/OFI (10 July 2015)	CL: Project case uncertainty: Please include the required/relevant leakage parameters in computations for uncertainty following Figure 3 of the methodology. Please utilize the results of the accuracy assessment for burnt areas to formulate uncertainty for parameter ApBurnt. Please explain the source of data for parameter MCP and ensure it is pulling correct values for the uncertainty percentage estimation. Baseline uncertainty: Please fix the baseline uncertainty value for dburn. Please explain the discrepancy between the uncertainty calc baseline emissions and biomass burning values and year 5 of these corresponding values in the summary emissions table, if warranted please correct. Please use values closer to when the baseline was set to approximate uncertainty for parameters involving area. Please incorporate all required baseline uncertainty parameters following Figure 2 of the methodology unless it can be demonstrated and/or justified that all the required parameters are included within other parameter estimates (for instance values reflected in MR Table 13) and that their use is conservative. A short explanation of inclusive/exclusive of a given parameter in uncertainty estimates is sufficient.
Round 3 Response from Project Proponent (16 July 2015)	Project case uncertainty: The values for leakage have been added to the uncertainty calculations. These relate to parameters listed in Equation 72 (HistHa) and Equation74 (Adef,LK). These values were generated from an accuracy assessment of the baseline land cover classification and of the leakage areas monitored in this reporting period and provided in response to this finding, respectively. The figures from the burnt area assessment were also updated in the calculation spreadsheet. Baseline uncertainty: The uncertainty figures for parameters related to the baseline were validated in the Project Documentation and are replicated here for this verification period. The majority of the parameters used in the baseline were default values and therefore had an uncertainty value of zero. Such parameters have been excluded from the baseline uncertainty to avoid diluting the total uncertainty value. It is conservative to do so. The area uncertainties for the baseline are the values from the accuracy assessment in the validated PD. The aboveground baseline carbon stock uncertainty values are included (see equation in cell G28-G36 which includes biomass uncertainty values calculated in cells G3-G11). The Project Proponent believes the uncertainty calculation to be conservative and the correct values which has been validated.
Final ESI Findings (19 July 2015)	The verifier and the PP went through uncertainty calcs for each parameter used in quantification. The verifier agrees with the PP's assertion that values employed are conservative and reasonable, as well as following the intent of the methodology to capture variability among all parameters used in quantification. The item is addressed.

Item Number	30
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	See Eq. 130.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Rimba Raya_2013_2014_M3.xlsx, and VCS CCB Monitoring Implementation Report-M3_V1.2.pdf (Section 6.3)
ESI Findings - Round 1 (27 February 2015)	This item appears to be calculated in Monitoring Calculations spreadsheet, Ex-post uncertainty tab in cell L:21. The formula does not appear to follow VM0004 equation 130.
Round 1 NCR/CL/OFI (27 February 2015)	NCR: Please implement Equation 130 in the Monitoring Calculations spreadsheet as it is written in VM0004. Also pending NCR above for Step 24.
Round 1 Response from Project Proponent (18 April 2015)	No formal response, NCR will be re-issued, and new version of the spreadsheet does not address.
ESI Findings - Round 2 (27 May 2015)	This item is calculated in Monitoring Calculations spreadsheet, ExpostUncertainty 2013_2014 tab in cell Y:46 (in Rimba Raya_M22013_2014V1.0.xlsx). The labelled Equation 130 formula does not follow VM0004 equation 130 where parameter UncertaintyBSL,t is missing.
Round 2 NCR/CL/OFI (27 May 2015)	NCR: Please compute Equation 130 in the Monitoring Calculations spreadsheet as it is written in VM0004-130. See cell Y46 in ExpostUncertainty 2013_2014 tab.
Round 2 Response from Project Proponent (30 June 2015)	Uncertainty from the baseline was added to the calculation spreadsheet to ensure that Equation 130 was correctly implemented. Please see corrections made to tab 'Ex-post Uncertainty 2013_2014' which include baseline uncertainty estimates for the current monitoring year.
ESI Findings - Round 3 (10 July 2015)	Uncertainty from the baseline appears to have been added to the calculation spreadsheet to ensure that Equation 130 was correctly implemented. Corrections were implemented in 'Ex-post Uncertainty 2013_2014' which include baseline uncertainty estimates for the current monitoring year (cell Y:46). The item is addressed.

Item Number	31
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	To ensure the net avoided emissions are measured and monitored precisely, credibly, verifiably and transparently, a quality assurance and quality control (QA/QC) procedure shall be implemented, including:
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR Section 9.2
ESI Findings - Round 1 (27 February 2015)	The MR notes in section 9.2 that detailed QA/QC procedures are outlined in "'QA_QC ProcessV1.2." A copy of this procedure is needed, following all 5 components below and having a targeted precision level. Receipt of the SOP/QA-QC documentation will be assessed against all monitoring procedures observed during the site visit.
Round 1 NCR/CL/OFI (27 February 2015)	NCR: Please provide the QA/QC documentation following all requirements for this section. Application of each of the sub-requirements will be assessed upon receipt of this documentation.
Round 1 Response from Project Proponent (18 April 2015)	
ESI Findings - Round 2 (27 May 2015)	No response was submitted for this finding request. In the MR, many data/parameters list "Refer to Standard Operating Procedure - Monitoring for Fire, Logging Gaps and Land Cover Change" for the QA/QC procedures to be applied. The documentation of how these procedures were applied in this monitoring period has not been supplied yet and may suffice to satisfy this request.
Round 2 NCR/CL/OFI (27 May 2015)	CL: Please provide the QA/QC documentation following all requirements for this section.
Round 2 Response from Project Proponent (30 June 2015)	The requested file was provided in response to this clarification request.
ESI Findings - Round 3 (10 July 2015)	Documentation was provided which addresses the QA/QC procedures for elements under this requirement with the exception of remote sensing which is requested again below. The items here are addressed.

Item Number	32
Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14	A subset of image plots should be selected randomly and interpreted independently by at least one different analyst.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR Section 9.2.2
ESI Findings - Round 1 (27 February 2015)	It is unclear of how the independent interpretation of the randomly selected strata was performed to check the landsat classification.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please assert and state within the MR whether independent interpretation was performed as suggested in this requirement.
Round 1 Response from Project Proponent (18 April 2015)	The following text was added to Section 9.2.1 - The independent interpretation is a re-interpretation of the Landsat images from another person without looking at the classification. The accuracy assessment for 2013-2014 monitoring period was conducted on the basis of field information provided by the project proponent to the land cover, land cover change classification consultant (RRS).
ESI Findings - Round 2 (27 May 2015)	The added text to Section 9.2.1 of the MR is sufficient to satisfy this request. Other elements for the QA/QC plan in Section 9.2 are satisfied. However, additional QA/QC procedures would be beneficial for the remote sensing monitoring component to satisfy all elements of 25.2. It does not appear enough detail was required in the original QA/QC plan for repeatable measurements, including for instance, consistent imagery acquisition, pre/post image processing, and acquisition of ground reference points for generation of accuracy assessment. Section 3.4 #6 (bottom of Page 72) of the PD states "The QA/QC plan will be improved and detailed in Years 2 and 3 as project monitoring systems are refined." It does not appear that this has occurred.
Round 2 NCR/CL/OFI (27 May 2015)	CL: Following the requirements outlined in the entirety of Section 25.2 and pertaining to 25.2.2, please outline additional detail of the internal remote sensing processes from the QA/QC plan, which describes SOPs for each step of imagery collection and analysis. Please provide the verification team a copy of Annex 6, which we do not currently have in our records.

Round 2 Response from Project Proponent (30 June 2015)	The PP has been progressively working with new staff to develop Standard Operating Procedures that outline the requirements for each of the monitoring tasks. These have been written by the staff with some support and will continue to be updated as the experience of the staff grows. The set of SOPs provided in response to this clarification request replace Annex 6 as these represent the most up to versions and expansion of Annex 6. Please note the procedures of RSS in conducting the land cover assessment have been integrated into the relevant PP SOP so that the staff involved with the accuracy assessment can read the prior steps. The PP is committed to improving the skills and experience of the staff which will in turn be reflected in continually improving the SOP documentation. This includes exploring with RSS to host the PP GIS expert in Munich and RSS spending sometime in the field during the field campaign to collect photos for the accuracy assessment.
ESI Findings - Round 3 (10 July 2015)	In addition to the response from the PP, SOP documentation was supplied to verifiers to illustrate the processes for remote sensing data acquisition and analysis. Sufficient monitoring SOPs were outlined for MODIS hotspot monitoring, disturbances, gaps and peat subsidence. However, verifiers were unable to locate SOPs for the remote sensing technical components of monitoring including classification approach, training data collected, cloud masking, post-classification analysis, etc. Procedures or broad methods performed by RSS do not yet appear to have been defined in any monitoring documentation. Verifiers recognize remote sensing techniques have improved since project start but also checked the validated PD for details outlined technical remote sensing methods employed in monitoring.
Round 3 NCR/CL/OFI (10 July 2015)	CL: Verifiers request a short but concise technical remote sensing SOP document for monitoring which addresses higher level Requirement "25.2 (2) reliable collection and analysis of aerial imagery (if applicable)." For instance this document would outline procedures including classification approach, training data collected, cloud masking, post-classification analysis, etc. so that monitoring moving forward can be consistent and accurate.
Round 3 Response from Project Proponent (16 July 2015)	The project proponent has worked with its external consultant to produce a brief SOP covering the requirements of section 25.2(2) which has been uploaded to RSS ftp server. The project aims to continue using its external consultants who are world renowned remote sensing experts in peat swamp forest land classification to generate land cover change statistics to main the impartial assessment of change within the project.
Final ESI Findings (19 July 2015)	The remote sensing SOP document submitted is sufficient to satisfy this request. Technical descriptions of methods employed are in good remote sensing practice. This document will greatly assist in future verifications for ensuring good practices have been implemented correctly and consistently. The item is addressed.

Item Number	33
VCS AFOLU Non-Permanence Risk Tool, Version 3.2 04 Oct 2012	Mitigation: Adaptive management plan in place. Adaptive management plans are those that identify, assess and create a mitigation plan for potential risks to the project, including those identified in this document, and any other obstacles to project implementation. They include a process for monitoring progress and documenting lessons learned or corrections that may be needed, and incorporating them into project decision-making in future monitoring periods. The onus is on the project proponent to demonstrate that such plans are in place, that such plans have considered the realm of potential risks and obstacles to the project, and that a system is in place for adapting to changing circumstances.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS Non-Permanence Risk Report_RimbaRayaM3_V1.0.pdf (Round 1); VCS Non-Permanence Risk Report_RimbaRayaM3_V1.1.doc (Round 2)
ESI Findings - Round 1 (27 February 2015)	The Project is claiming an adaptive management plan is now in place. This needs to be further explored.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please supply documentation illustrating the adaptive management plan.
Round 1 Response from Project Proponent (18 April 2015)	The Project Proponent has opted to not claim this mitigation; therefore no additional material is provided.
ESI Findings - Round 2 (27 May 2015)	Since the project has opted to not include an adaptive management plan, the original CL is no longer valid, and this item is addressed.

Item Number	34
VCS AFOLU Non-Permanence Risk Tool, Version 3.2 04 Oct 2012	Project cash flow breakeven point is less than 4 years from the current risk assessment
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS Non-Permanence Risk Report_RimbaRayaM3_V1.0.pdf; VCS Non-Permanence Risk Report_RimbaRayaM3_V1.1.doc
ESI Findings - Round 1 (27 February 2015)	InfiniteEARTH has executed forward sales triggered upon the first verification that will create an endowment which will sufficiently fund the operational budget through an annuity for the entire life of the project and possibly in perpetuity. The Risk report states "Project Breakeven: The Project cash flow breakeven point is less than 4 years from the current risk assessment. The Project has secured 80% or more of the funding needed to cover the total cash out before the Project breaks even. Evidence: Confidential budgets will be shared with the verifier." However, no supporting documentation was provided.

Round 1 NCR/CL/OFI (27 February 2015)	NCR: Please provide the updated documentation of current cash flow and funding for this verification period to satisfy this requirement.
Round 1 Response from Project Proponent (18 April 2015)	Note the Project states in the risk assessment that the breakeven point is less than 4 years from the current monitoring period; not greater than 10 years from the current monitoring period as the listed NCR states. In response to the specific request of the NCR the Project Proponent has now provided an updated Breakeven spreadsheet that covers the current monitoring period. This breakeven spreadsheet shows that the project is currently cash flow positive which demonstrates that the project break even point is less than 4 years from the current risk assessment.
ESI Findings - Round 2 (27 May 2015)	The verification team notes the finding should have been listed under the category "Project cash flow breakeven point is less than 4 years from the current risk assessment." The finding/item has been moved here accordingly. A breakeven spreadsheet was submitted which outlines the current cash situation (2015-2016) in ball park figures. Per Section 2.2.2 of the Risk Tool though, "cash flow breakeven point is the year in which the cumulative cash flow is positive (i.e., cash flow in exceeds cash flow out) and stays positive." Therefore, the breakeven analysis needs to account for cumulative cash flow since the beginning and it is unclear whether the provided breakeven analysis suffices. Also, it is unclear from the breakeven analysis whether all cash flow outputs (ex. loan repayments) and cash flow inputs (carbon sale prepayments) are accounted for (see 2.2.2 (2))as expenditures and sales are broadly lumped and may be missing elements. To substantiate the claim for the current cash situation, a demonstration is needed in form of a financial statement or related (2.2.2 (4)).
Round 2 NCR/CL/OFI (27 May 2015)	CL: Please revise the breakeven analysis to account for cumulative cash flows and add detail where needed to explain the individual components of cash flow in and cash flow out. Please also provide demonstrable evidence to substantiate the current cash balance.
Round 2 Response from Project Proponent (30 June 2015)	Additional information was added to the breakeven spreadsheet which was resubmitted in response to this clarification request. Two new tabs were added to the spreadsheet which contain copies of bank statements as evidence of the cash flow stated in the spreadsheet.
ESI Findings - Round 3 (10 July 2015)	Verifiers re-examined the newly submitted cash flow breakeven spreadsheet. The bank statements enclosed were sufficient to substantiate the current cash flow for the project and a score of 0 for financial viability. The item is addressed.

Item Number	35
VCS AFOLU Non-Permanence Risk Tool, Version 3.2 04 Oct 2012	NPV from the most profitable alternative land use activity is expected to be at least 100% more than that associated with project activities; or where baseline activities are subsistence-driven, net positive community impacts are not demonstrated
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS Non-Permanence Risk Report_RimbaRayaM3_V1.0.pdf (Round 1); VCS Non-Permanence Risk Report_RimbaRayaM3_V1.1.doc (Round 2)

ESI Findings - Round 1 (27 February 2015)	Risk report provides a narrative of OC, but no supporting files were provided. The risk report states "The Project Proponent has committed to deliver equivalent tax and royalty payments to the Government as they would receive under the baseline scenario land use (i.e. palm oil)." This statement may be a bit misleading as this commitment to the government would be difficult to fulfil given the alternative. This statement also is contradictory, "A conservative revenue from GHG sales of $5 per credit was applied which is below the average reported in the Ecosystems Marketplace annual report for 2013 of $4.20."
Round 1 NCR/CL/OFI (27 February 2015)	NCR: Please address the quoted text from the Risk Report in the findings and also provide the updated NPV analysis for this verification period. Please ensure to base all assumptions on published sources.
Round 1 Response from Project Proponent (18 April 2015)	The text related to royalty payments has been removed. The carbon credit value applied in the OC and quoted in the text of the risk assessment report was adjusted to the current Ecosystem Marketplace value and finally the spreadsheet of the OC was provided in response to this NCR.
ESI Findings - Round 2 (27 May 2015)	Newly provided documents including a recent study (Lu and Liu, 2013) illustrates the high opportunity cost of conversion. The value tCO2e of $4.80 was corroborated with "Turning over a new leaf. State of the Forest carbon Markets 2014. Available at: http://forest-trends.org/fcm2014.php." The NPV analysis contains valid assumptions for values and sources are appropriate. The item is addressed.

Item Number	36
VCS AFOLU Non-Permanence Risk Tool, Version 3.2 04 Oct 2012	With legal agreement or requirement to continue the management practice
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS Non-Permanence Risk Report_RimbaRayaM3_V1.0.pdf (Round 1); VCS Non-Permanence Risk Report_RimbaRayaM3_V1.1.doc (Round 2)

ESI Findings - Round 1 (27 February 2015)	Legal agreement or requirement to continue the management practice refers to any legally enforceable agreement or requirement, such as a conservation easement or protected area law that would require the continuation of the management practice that sequesters carbon or avoids emissions for the entire project longevity. Project documentation states "Project activities will be maintained for 60 years from the beginning of the project start date (i.e. Project longevity). This is longer than the project crediting period (i.e. 30 years) as the licence granted over the project is for 60 years. (30 years + 30 years renewable)." "This licence held by the Project and the intention to set up a perpetual fund for the Project management and activities demonstrates that appropriate licenses and funds will be available to ensure continued activities beyond the project crediting period. " Evidence of the agreements/decrees (including maps) were provided at the previous verification and assertions by the PP state that documentation remains unchanged. Evidence of longevity (3 noted legal documents in section 1.4) is requested again to meet this requirement. The DECREE OF MINISTER OF FORESTRY OF REPUBLIC OF INDONESIA legally binding document is expected to indicate the 60-year lifespan of the agreement.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please provide the documentary evidence to support project longevity agreements in place.
Round 1 Response from Project Proponent (18 April 2015)	The documents provided in response to Clarification 35 below address this Project Longevity clarification request. The agreements are in place for the duration of 60 years.
ESI Findings - Round 2 (27 May 2015)	Page 8 of the document "Decree_36,000 ha.pdf" government decree document ERC License explicitly states that "This Decree shall take effect on the response for a period of 60 years." This constitutes a legal agreement to continue the management practice. Another formal document was supplied outlining a management agreement with the adjacent Puting national park. Project longevity is appropriately scored. The item is addressed.

Item Number	37
VCS AFOLU Non-Permanence Risk Tool, Version 3.2 04 Oct 2012	Ownership and resource access/use rights are held by different entity(s) (eg, land is government owned and the project proponent holds a lease or concession)
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS Non-Permanence Risk Report_RimbaRayaM3_V1.0.pdf (Round 1); VCS Non-Permanence Risk Report_RimbaRayaM3_V1.1.doc (Round 2)

ESI Findings - Round 1 (27 February 2015)	Forest land is owned by the Government of Indonesia and User Rights are allocated under a process of allocating concessions; therefore the ownership and the resource access/user rights are held by different entities (i.e. the land is government owned and the project proponent holds a lease or concession). The agreements [ex. TNTP -PT RRC 010713 (eng)(translation.pdf)] as referenced from the previous verification should demonstrate that there are no outstanding disputes over land tenure, ownership or access/user rights. In conversations with the Project Proponent, the breach of the northern boundary of the Rimba Raya concession occurred immediately prior to the finalisation of the agreements in early 2013. This boundary breach was seen as an opportunistic event by the agent of deforestation. The agreements are now finalised and restorative work has commenced by the Project Proponent. The Project is now operational and will uphold the legally binding commitment to the long term protection of the Rimba Raya Biodiversity Reserve. Documentary evidence is needed for the final confirmation of this requirement.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please provide the user rights agreement documentation noted in Table 1 of Section 2.1.
Round 1 Response from Project Proponent (18 April 2015)	The ERC license granted by MoFor was for 36,331 ha, which only partially covered Rimba Raya's CAA. To secure rights over the remaining CAA areas, Rimba Raya made agreements with various entities with pre-existing land management rights in those areas. A letter by MoFor that acknowledged Rimba Raya's plans to implement ecosystem restoration activities across the PMZ covered by those various agreements. For VCS and CCBA, these agreements satisfied their 'rights of use' criteria. Rights of use by VCS can be established through various approaches, including securing rights granted by a national authority such as MoFor (in the case of ERC) or the district head, and contractual agreements with entities with rights to emit GHGs (e.g. converting forest to oil palm). The agreements listed in Table 1 of Section 2.1 have been provided in response to this clarification request.
ESI Findings - Round 2 (27 May 2015)	Documentary evidence was supplied from the Indonesian Ministry of Forestry, the National park Authority (Puting Park), and PT BEST. These materials substantiate PP claims that the ownership and the resource access/user rights are held by different entities. The appropriate score was chosen here. The item is addressed.

Item Number	38
VCS AFOLU Non-Permanence Risk Tool, Version 3.2 04 Oct 2012	Mitigation: Project area is protected by legally binding commitment (eg, a conservation easement or protected area) to continue management practices that protect carbon stocks over the length of the project crediting period
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS Non-Permanence Risk Report_RimbaRayaM3_V1.0.pdf (Round 1); VCS Non-Permanence Risk Report_RimbaRayaM3_V1.1.doc (Round 2)

ESI Findings - Round 1 (27 February 2015)	The agreements collectively requested above are expected to demonstrate that there are no outstanding disputes over land tenure, ownership or access/user rights. Given that the Project is now fully operational and will uphold the legally binding commitment to the long term protection of the project area, a score less than 0 may be warranted here. It is unclear if the documentation can be considered "Legal agreement or requirement to continue the management practice refers to any legally enforceable agreement or requirement, such as a conservation easement or protected area law that would require the continuation of the management practice that sequesters carbon or avoids emissions for the entire project longevity."
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please address the findings and assert whether the legally binding commitments in place can mitigate protection of stocks over the crediting period.
Round 1 Response from Project Proponent (18 April 2015)	The ERC license granted by MoFor was for 36,331 ha, which only partially covered Rimba Raya's CAA. To secure its user rights over the remaining CAA, Rimba Raya had to negotiate directly with actors driving deforestation in the area, such as oil palm companies. It also negotiated with the Seruyan district government so that some non-forest zone areas could be managed as ecosystem restoration areas, and could act as a buffer for TPNP. The resulting agreements enabled Rimba Raya to proceed with verification by VCS and CCBA. In May 2013, MoFor issued a letter considering Rimba Raya's proposed management area of 64,881 ha for an ecosystem restoration business. This area combines the various agreements and the ERC permit. Therefore strictly speaking the user rights is established through a range of agreements with more than one party and the legal requirement to continue management practices that the ERC Licence represents covers most but not all of the CCA. Whilst the project has legal agreements in place for the remaining area of the Project Management Zone (the CCA and the buffer zone) these agreements grant rights of use to Rimba Raya Conservation; they do not specifically represent a legal requirement to continue the management practices. therefore this mitigation is not sort.
ESI Findings - Round 2 (27 May 2015)	Verifiers reviewed submitted documentation which substantiates the area of the ERC license and demonstrates a legally binding agreement by RRC. The Project has established the 'working area' map with the Indonesian Government which represents the legally enforceable binding agreement that this land is now to be used as a carbon project. Within the working area map there are various stakeholders which Rimba Raya have made 'interim agreements' with (i.e. the MOU with PT Best being one of those) until the land use within the agreed boundaries of the working area map are formally changed through the Indonesian land classification system. Since the PP is not taking the mitigation on this element, and the land tenure score is appropriately selected based on existing commitments. The item is addressed.

Item Number	39
VCS AFOLU Non-Permanence Risk Tool, Version 3.2 04 Oct 2012	Governance score of -0.79 to less than -0.32

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	World Governance Indicators website, VCS Non-Permanence Risk Report_RimbaRayaM3_V1.0.pdf
ESI Findings - Round 1 (27 February 2015)	ESI confirmed the score to be -.46 on average. Broken reference link in risk Report.
Round 1 NCR/CL/OFI (27 February 2015)	CL: Please fix the reference link discrepancy at the beginning of Section 2.3.
Round 1 Response from Project Proponent (18 April 2015)	Broken reference link to Table 3 was corrected.
ESI Findings - Round 2 (27 May 2015)	Broken reference link confirmed to have been fixed. The item is addressed.

APPENDIX C – CCB NCR/CL/OFI SUMMARY

12 VERIFICATION NON-CONFORMANCE/CLARIFICATION REQUEST

12.1 G1 Original Conditions in the Project Area

Indicator G1.1 – The location of the project and basic physical parameters (e.g. soil, geology, climate).	The project area is in the Seruyan Regency, Central Kalimantan, Indonesia, between 112°01'12 "- 112°28'12" east longitude and 02°31'48"- 03°21'00" south latitude, between Tanjung Putting National Park and the Seruyan River. The land surface within much of the project zone is dominated by recent deposits compared to the rest of Kalimantan. Soils in the project zone range from peat to soils formed in recent alluvium, wind-blown deposits and wet Ultisols. The topography is largely flat, with some rolling hills and ridges. Climate is tropical. Rainfall ranges from about 2500 – 2700 mm/year, with distinct wet and dry seasons. The project area is in two agro-climatic zones, defined by the length of the wet and dry seasons.
Evidence Used to Assess Conformance:	Section 1.2 of the PIR.
Findings:	The Project Proponents have defined the location of the project zone and provided a basic description of the land and climate, addressing this indicator.
Clarification Request (CL):	Typo in Section 1.2.2 – “too” should be “to.” The first column in Table 2 consists of abbreviations of geological classes that are not defined, likely because they are from a map that does not appear in the PIR. Please provide the name of the geologic class if it is important to the landscape description, otherwise the description of the surface geology is sufficient.

	The first column of Table three refers to map units for a map which does not appear in the document. Please either provide the soil map or eliminate the column including the soil mapping units.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	The text within section 1.2 describing physical parameters has been summarized into one section titled Physical Parameters which is consistent with how this information was presented in the last monitoring periods PIR.
Evidence Used to Close NCR:	The clarifications were addressed through summarizing the information and eliminating section 1.2.2 from the version of the monitoring report that was received on 18 April 2015.
Date Closed:	04 May 2015

Indicator G1.2 – The types and condition of vegetation within the project area.	This indicator was assessed during validation, was issued a positive validation statement, and is therefore not being re-assessed during verification. It refers to the conditions of the project area at the start of the project, which can no longer be verified.

Indicator G1.3 – The boundaries of the project area and the project zone.	The general location of the project area is described, in terms of longitude and latitude, as well as landmarks, like the Seruyan River and the eastern border of the Tanjung Puting National Park. A map graphically depicts the project location, the national park, and nearby oil palm concessions.
Evidence Used to Assess Conformance:	Section 1.2 of the PIR, numerous shapefiles depicting project boundaries, fires, logging, drainage, etc.
Findings:	The general location of the project area and zone is provided in the PIR, More precise boundaries of the project and accounting areas were also provided to the auditors.

Indicator G1.4 - Current carbon stocks within the project area(s), using stratification by land-use or vegetation type and methods of carbon calculation (such as biomass plots, formulae, default values) from the Intergovernmental Panel on Climate Change's 2006 Guidelines for National GHG Inventories for Agriculture, Forestry and Other Land Use5 (IPCC 2006 GL for AFOLU) or a more robust and detailed methodology.	Please see results from concurrent VCS verification.
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

Indicator G1.5 - A description of communities located in the project zone, including basic socio-economic and cultural information that describes the social, economic and cultural diversity within communities (wealth, gender, age, ethnicity etc.), identifies specific groups such as Indigenous Peoples8 and describes any community characteristics.	This indicator was assessed during validation, was issued a positive validation statement and is therefore not being re-assessed during verification.

Indicator G1.6 - A description of current land use and customary and legal property rights including community property in the project zone, identifying any ongoing or unresolved conflicts or disputes and identifying and describing any disputes over land tenure that were resolved during the last ten years (see also G5).	This indicator was assessed during validation, was issued a positive validation statement, and is therefore not being re-assessed during verification. It was clear during the validation site visit that land in Indonesia belongs to the state, and land use rights are allocated by the national government, with significant input from the regional government. Local communities have little power, even over lands traditionally assumed to belong to a particular community.
Evidence Used to Assess Conformance:	Section 4.4.1 of the PIR, interviews and observations made during the site visit.
Findings:	The description of land use rights in Indonesia can be garnered from many parts of the PIR. It is notable that Project Proponents have gone above and beyond legal requirements in including local communities in devising land use plans on lands controlled by the project, but traditionally assumed to be under the control of the community. The site visit also revealed that laws and regulations regarding land use rights have not changed since the previous validation.

Indicator G1.7 - A description of current biodiversity within the project zone (diversity of species and ecosystems) and threats to that biodiversity, using appropriate methodologies, substantiated where possible with appropriate reference material.	This indicator was assessed during validation, was issued a positive validation statement, and is therefore not being re-assessed during verification.

Indicator G1.8 - An evaluation of whether the project zone includes any of the following High Conservation Values (HCVs) and a description of the qualifying attributes. **Indicator 8.1** - Globally, regionally or nationally significant concentrations of biodiversity values: a. protected areas b. threatened species c. endemic species d. areas that support significant	This indicator was assessed during validation, was issued a positive validation statement, and is therefore not being re-assessed during verification.

concentrations of a species during any time in their lifecycle (e.g. migrations, feeding grounds, breeding areas). **Indicator 8.2** - Globally, regionally or nationally significant large landscape-level areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance. **Indicator 8.3** Threatened or rare ecosystems. **Indicator 8.4** - Areas that provide critical ecosystem services (e.g., hydrological services, erosion control, fire control). **Indicator 8.5** - Areas that are fundamental for meeting the basic needs of local communities (e.g., for essential food, fuel, fodder, medicines or building materials without readily available alternatives). **Indicator 8.6** - Areas that are critical for the traditional cultural identity of communities (e.g., areas of cultural, ecological, economic or religious significance identified in collaboration with the communities).	

12.2 G2 Baseline Projections

Indicator G2.1 - Describe the most likely land-use scenario in the absence of the project following IPCC 2006 GL for AFOLU or a more robust and detailed methodology, describing the range of potential land use scenarios and the associated drivers of GHG emissions and justifying why the land-use scenario selected is most likely.	The most likely land use scenario in the absence of the project is drainage and use for oil palm production. The land was slated for such use before the concession expired and a brief opportunity became available to change the designated land use. Other lands granted to the oil palm company was full developed and planted to oil palm. The same company continues to try to expand into the Rimba Raya concession to this day.
Evidence Used to Assess Conformance:	Section 4.4 of the PIR, observations made during the site visit, interviews with local stakeholders, including OFI founder, Dr. Galdikas.
Findings:	There is little doubt that the project area would now be part of a palm oil plantation in the absence of the project.

Indicator G2.2 - Document that project benefits would not have occurred in the absence of the project, explaining how existing laws or regulations would likely affect land use and justifying that the benefits being claimed by the project are truly 'additional' and would be unlikely to	The without project scenario would remove most, if not all of the ecosystem services provided by the land, including biodiversity and protection of endangered species, as well as water filtration and flood control services that an intact peatland would provide. These benefits would no longer be available, because they depend on the ecosystem remaining intact, which would not happen in the without

occur without the project.	project scenario.
Evidence Used to Assess Conformance:	Section 4.4 of the PIR, observations during the site visit, common knowledge regarding habitat and ecosystem services.
Findings:	The landscape would have been altered, the forest replaced and hydrological services disrupted in the absence of the project, guaranteeing ecosystem benefits would cease or be severely depleted. Other project benefits derived from carbon offset sales would obviously not occur, either.

Indicator G2.3 - Calculate the estimated carbon stock changes associated with the 'without project' reference scenario described above. This requires estimation of carbon stocks for each of the land-use classes of concern and a definition of the carbon pools included, among the classes defined in the IPCC 2006 GL for AFOLU. The timeframe for this analysis can be either the project lifetime (see G3) or the project GHG accounting period, whichever is more appropriate. Estimate the net change in the emissions of non-CO2 GHG emissions such as CH4 and N2O in the 'without project' scenario. Non-CO2 gases must be included if they are likely to account for more than 5% (in terms of CO2-equivalent) of the project's overall GHG impact over each monitoring period. Projects whose activities are designed to avoid GHG emissions (such as those reducing emissions from deforestation and forest degradation (REDD), avoiding conversion of non-forest land, or certain improved forest management projects) must include an analysis of the relevant drivers and rates of deforestation and/or degradation and a description and justification of the approaches, assumptions and data used to perform this analysis. Regional-level estimates can be used at the project's planning stage as long as there is a commitment to evaluate locally-specific carbon stocks and to develop a project-specific spatial analysis of deforestation and/or degradation using an appropriately robust and detailed carbon accounting methodology before the start of the project.	Please see results from concurrent VCS verification.
Evidence Used to Assess Conformance:	

Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

Indicator G2.4 - Describe how the 'without project' reference scenario would affect communities in the project zone, including the impact of likely changes in water, soil and other locally important ecosystem services.	Communities would likely be affected in the same way communities that are now surrounded by oil palm plantations are currently being affected. Those communities face conflict over land use rights, encroachment by the oil palm companies without agreement with communities, communities complain of being treated unfairly and being unjustly compensated for lands taken. This situation is unlikely to change without some upheaval. Ecosystem services would likely decline with the installment of artificial drainage and a monoculture forest that requires heavy chemical input.
Evidence Used to Assess Conformance:	Section 4.4.1 of the PIR, interviews with local community members.
Findings:	It is likely that Rimba Raya communities would be subject to similar treatment by the oil palm companies in the absence of the project, and lose ecosystem services at the same time.

Indicator G2.5 - Describe how the 'without project' reference scenario would affect biodiversity in the project zone (e.g., habitat availability, landscape connectivity and threatened species).	The orangutan population of TPNP is boosted by 14% with the addition of Rimba Raya project lands. This would be lost if the land were to be converted. In addition, oil palm companies have planted oil palm within the park's borders. A series of 10 km of roads were discovered leading from the illegally planted area further into the park for illegal logging operations. Satellite imagery revealed 17,000 ha of park land would have been lost if this incursion was not found and stopped. Without the project, establishing northern and eastern boundaries, continued incursions into the national park would occur, damaging biodiversity.
Evidence Used to Assess Conformance:	Section 4.4.2 of the PIR, site visit observations.
Findings:	There is little doubt the biodiversity of the project lands and the biodiversity of the national park itself would suffer in the absence of the project.

12.3 G3 Project Design and Goals

Indicator G3.1 - Provide a summary of the project's major climate, community and biodiversity objectives.	The Rimba Raya project avoids the planned conversion of a tropical peat swamp forest to a drained palm oil plantation. Climate objectives are avoiding the 130 million tonnes of CO_2e that would have been emitted in the 'without project' scenario, and to pose as a physical barrier between palm

	oil plantations and Tanjung Puting National Park, to protect the hydrological integrity of the park and avoid emissions from drained peat swamp there. Biodiversity objectives are to expand the contiguous habitat of the national park all the way to the Seruyan River, to the east of the park, providing a physical boundary, and supporting the work of Orangutan Foundation International and Dr. Birute Galdikas with project activities aimed at extending the organization's conservation, rehabilitation and environmental ed. programs. Community objectives are to engage with the communities in the project zone to improve access to healthcare, education and governmental services, and to ensure food security, access to employment and capacity building opportunities.
Evidence Used to Assess Conformance:	Section 1.1 of the PIR, site visit.
Findings:	The Project Proponents summarized the objectives of the project, fulfilling the requirements of this indicator.

Indicator G3.2 - Describe each project activity with expected climate, community and biodiversity impacts and its relevance to achieving the project's objectives. *Describe how each project activity has achieved the expected community and biodiversity impacts, and any unexpected impacts not included in the project description, and their relevance to achieving the project's objectives.*	Project activities described in the PIR include: 1. The primary project activity, establishing the Rimba Raya Reserve, achieves most biodiversity goals. 2. Hiring of local guards/field crews is providing income opportunities in local communities, however few people were hired during this crediting period. A significant number of people were hired for guarding/patrol and fire brigades between the end of the crediting period and the site visit. 3. Fire response system – not in place during crediting period, but people hired and training commenced since then. 4. Monitoring plan – biodiversity impacts obvious. 5. Replanting/enrichment – about 160,000 seedlings were planted in formerly forested areas in the project area (not for C accounting purposes), providing income to local community members, including large numbers of women. Extensive replanting operations were being conducted during the site visit. 6. Cash crop agroforestry activities – nurseries established, plantings begun. Provides income, food sources for communities. 7. OFI funding – biodiversity clearly benefits. 8. Co-management of TPNP – still in planning stage, this activity will provide needed resources to the underfunded park, benefiting biodiversity and communities through employment opportunities. 9. Social buffer – the goal is to surround the project with communities in favor of the project, who understand and buy into the project and its goals.

	A key to this is economic development. While limited activity took place in this regard during the crediting period, education, hiring and training in regard to the project and project supported activities was clearly in evidence during the site visit. 10. Community centers – stimulus fund established, some centers built. Multiple positive impacts for communities and biodiversity. 11. Agricultural training is in progress – community impacts clear, potential biodiversity impacts are obvious. 12. Clean water systems – ceramic water filter devices were distributed and were in use during the monitoring period. Subsequent inquiries revealed some towns had pre-existing water systems, which have now be repaired and a system put in place to provide maintenance. 13. Fuel efficient stoves – so far, pilot programs for efficient stoves have met limited success, but efforts are continuing to provide stoves desired by community members. 14. Biochar – no activity commenced thus far. 15. Small scale solar lighting – in planning stages. 16. Micro-credit – no activity commenced thus far. 17. Sustainable healthcare – no activity commenced thus far. 18. Floating clinic – in early planning stage. 19. Capacity building programs – some capacity building related to agricultural education and other general subject areas for high school and middle school students is underway in Telaga Pulang. Classes observed and students interviewed during site visit.
Evidence Used to Assess Conformance:	Section 2.2 of the PIR, site visit observations and interviews.
Findings:	The Project Proponents' efforts were dominated by the establishment and protection of project boundaries during the monitoring period, but the establishment and protection of the project area is key to most biodiversity goals and many community goals. Some community related activities commenced during the monitoring period (agricultural education in particular), but in the months between the end of the monitoring period and the site visit, many project activities were initiated and are in operation today. The goals of the project activities, providing income, increasing forest cover and crop diversity, are clearly and directly related to increasing the well-being of the local communities.

Indicator G3.3 - Provide a map identifying the project location and boundaries of the project area(s), where	The PIR provides a map (figure 1) depicting the location of the project area, nearby oil palm plantation concessions, the national park, some of the nearby towns, an orangutan

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).	release station and a post near Muara Dua. This constitutes the area expected to be impacted by the project activities.
Evidence Used to Assess Conformance:	Section 1.2 of the PIR.
Findings:	The project area and zone are depicted, as required by this indicator.

Indicator G3.4 - Define the project lifetime and GHG accounting period and explain and justify any differences between them. Define an implementation schedule, indicating key dates and milestones in the project's development.	The project start date is 01 July 2009, the accounting (crediting) period is 30 years, ending on 30 June 2038. The implementation period covered by the monitoring and implementation report is 01 July 2013 to 30 June 2014. Some important dates in the project's development are also given, including the first VCS verification year of July 2009 – June 2010, the second VCS verification and first CCB verification was July 2010 – June 2013. This monitoring period is consistent with the intended annual reporting cycle outlined in the PDD.
Evidence Used to Assess Conformance:	Sections 1.5 and 1.6 of the PIR, cover page of the PIR.
Findings:	The project start and end dates of 01 July 2009 – 30 June 2038 encompass 29 years, not 30 years.
Non-conformance Request (NCR):	Please revise the end date of the project to encompass the entire 30-year period (i.e., 30 June 2039).
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	No response provided.
Evidence Used to Close NCR:	Typos corrected.
Date Closed:	04 May 2015

Indicator G3.5 - Identify likely natural and human-induced risks to the expected climate, community and biodiversity benefits during the project lifetime and outline measures adopted to mitigate these risks.	The PIR describes the natural and human-induced risks to be continued pressure from palm oil expansion at the northern boundary, and from fires lit by bordering communities for agricultural or other purposes. The project is expanding patrols, establishing fire towers and plan to install permanent guard posts. The PIR refers to eventually permanently marking project boundaries. This was completed around the time of the site visit, with concrete posts spaced around the concession perimeter. The PIR also states the project will continue to seek ways to expand the income of local community members, reducing pressure on the project area lands.
Evidence Used to Assess Conformance:	Section 2.3 of the PIR, site visit observations.
Findings:	The site visit confirms that the project remains under pressure from an oil palm plantation seeking to expand at its northern boundary, but that the line is being held in a contested area near Ulak Batu. Burning pressures from surrounding communities also appear to be risks. Since the end of the monitoring period, many of the fire/monitoring teams have been hired from local communities. Many temporary tree planters and seedling

	growers have derived income through the project. In one town, an independent recycling business was developed under project guidance, employing several people, and providing banking services to collectors of recyclable materials. It is clear that the Project Proponents have taken strong steps to reduce the most pressing risks.

Indicator G3.6 - Demonstrate that the project design includes specific measures to ensure the maintenance or enhancement of the high conservation value attributes identified in G1 consistent with the precautionary principle.	The PIR explains that the HCVs identified for the project area are dependent upon the area remaining undrained and undeveloped. The main project activity and project goal – protection and enhancement of the project area – enhance the HCVs.
Evidence Used to Assess Conformance:	Section 2.4 of the PIR, site visit, basic premise of the project and common sense.
Findings:	While the specific HCVs are not mentioned in the PIR, the HCVs discussed in indicator G1.8 can all be maintained and/or enhanced by project activities.
Clarification Request (CL):	To help demonstrate protection of HCVs, please list the HCVs determined to be present in the project zone. (These should be available in the original PDD.)
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	No response provided.
Evidence Used to Close NCR:	The version of the monitoring report received on 18 April includes HCVs listed in Tables 4 and 5 (based on the HCV toolkit for Indonesia).
Date Closed:	04 May 2015

Indicator G3.7 - Describe the measures that will be taken to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime.	The PIR explains nine core activities that will enhance the benefits beyond the project lifetime: 1. Establishment of the Rimba Raya Reserve 2. Guard post network 3. Fire Plan 4. Monitoring Plan 5. Enrichment and Rehabilitation 6. Indigenous Species, Cash Crop, Community-based Agro-forestry Program 7. Funding of OFI activities 8. Co-management of Tanjung Puting National Park 9. Development of Social Buffer
Evidence Used to Assess Conformance:	Section 2 (IMPLEMENTATION OF DESIGN); site visit
Findings:	The PIR describes the measures in place to maintain the benefits beyond the project lifetime. These measures were previously validated, and activities were confirmed to be on-going during the site visit.

Indicator G3.8 - Document and defend how communities and other stakeholders potentially affected by the project activities have been identified and have been involved in project design through	The site visit revealed almost constant contact between project management and local communities and other stakeholders had been going on during the previous six to eight months. Six of ten communities successfully applied for and received community improvement grants. Grant

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.	funds were applied as determined by the communities. In interviews with traditional and governmental community leaders, auditors found that decision making regarding community-related project benefits was always a joint decision between the community and project management. No decisions were imposed on communities by the project. The PIR itself states that the monitoring report is distributed, and if local communities have input, they will be heard.
Evidence Used to Assess Conformance:	Section 2.7 of the PIR, site visit observations and interviews.
Findings:	Perhaps the most obvious general observation made during the site visit was that project management and stakeholders at all levels had regular communications, and these communications are considered vital to project goals. Project management and stakeholders appear to understand each other's points of view. The PIR, however, describes an earlier stage of project development, before community-related activities had commenced. This Section does not reflect the high levels of communication and mutual consultation in effect today.
Clarification Request (CL):	A brief summary of the present state of project – stakeholder communications in Section 2.7 would enhance a reader's understanding of project/stakeholder relations.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	New paragraph added to 2.7
Evidence Used to Close CL:	Added paragraph to Section 2.7 in the version of the monitoring report received on 18 April 2015 updates the reader on the rapid expansion in stakeholder communications since the end of the monitoring period.
Date Closed:	04 May 2015

Indicator G3.9 - Describe what specific steps have been taken, and communications methods used, to publicize the CCBA public comment period to communities and other stakeholders and to facilitate their submission of comments to CCBA. Project proponents must play an active role in distributing key project documents to affected communities and stakeholders and hold widely publicized information meetings in relevant local or regional languages.	The PIR states that a summary of this monitoring report was distributed in the project zone in all villages and sub-district seats. Notices were also placed on village bulletin boards and distributed by world education. During the site visit, messages regarding the scheduling of the auditor site visit and contact information for the auditing team and for filing comments with VCS/CCB were seen on community bulletin boards, in the local language. Formal and informal meetings with public officials and community members revealed regular contact between stakeholders and project management, and regular updates. Communications between project management

	and the community was described as intense by several parties.
Evidence Used to Assess Conformance:	Section 2.7 of the PIR, site visit observations and interviews.
Findings:	The auditors found that regular, nearly constant communications exist between the project and community members, traditional and official leaders, and other stakeholders. Managers are stationed in villages in the project zone, with locally hired staff. Regional government officials are in regular contact with management. The Jakarta staff is in daily contact with relevant national government officials, as their offices are within the Ministry of Forestry offices. Communications between the project and stakeholders is effective and nearly constant in many ways.

Indicator G3.10 - Formalize a clear process for handling unresolved conflicts and grievances that arise during project planning and implementation. The project design must include a process for hearing, responding to and resolving community and other stakeholder grievances within a reasonable time period. This grievance process must be publicized to communities and other stakeholders and must be managed by a third party or mediator to prevent any conflict of interest. Project management must attempt to resolve all reasonable grievances raised, and provide a written response to grievances within 30 days. Grievances and project responses must be documented.	This indicator is not addressed in version 1.2 of the monitoring report.
Evidence Used to Assess Conformance:	Section 2.7 of the PIR.
Findings:	This indicator was not addressed, though it was successfully addressed during the previous project verification process.
Non-conformance Request (NCR):	Please review the conflict resolution process described in the verified PIR for the previous monitoring period to ensure it is still relevant and is the policy in place for conflict resolution between stakeholders and the project. Include the conflict resolution process in the PIR.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	We confirm that this remains the conflict resolution process during the period under verification and have no intention of changing it in the near future.
Evidence Used to Close NCR:	Conflict resolution process remains the same. World Education will serve as the third party mediator, should that become necessary.
Date Closed:	04 May 2015

Indicator G3.11 - Demonstrate that financial mechanisms adopted, including projected revenues from emissions	The PIR states that the Project Proponents have had carbon revenues since 2013 through several sales and that sufficient funds are available to conduct the project.

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.	
Evidence Used to Assess Conformance:	Section 2.5 of the PIR.
Findings:	No accounting of project costs and revenues was provided.
Non-conformance Request (NCR):	Please provide evidence to show the project has budgeted sufficient funds to implement the project, and that an adequate flow of funds was provided for activities thus far.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	Budget has been provided in response to this finding and is provided in the folder CCBG4.7.
Evidence Used to Close NCR:	Rimba Raya Financial Report 2015.xlsx indicates there are more than sufficient funds and a sufficient cash flow to continue project activities through the next year, even with the current low price of voluntary carbon offset credits.
Date Closed:	12 May 2015

12.4 G4 Management Capacity and Best Practices

Indicator G4.1 - Identify a single Project Proponent which is responsible for the project's design and implementation. If multiple organizations or individuals are involved in the project's development and implementation the governance structure, roles and responsibilities of each of the organizations or individuals involved must also be described.	The Project Proponent is Infinite Earth, though other institutions are involved with specific programs and components of the project. PT Pandu Maha Wana (Asia Pacific Consulting Solutions is responsible for field measurements, monitoring, forest protection and community development. Orangutan Foundation International (OFI) has forest protection and ground surveying duties. World Education (WE) has community development and education duties. Environmental Accounting Services provides support for VCS/CCB verification activities. Remote Sensing Solutions (RSS) is responsible for remote sensing and land use change analysis. Contact persons and contact information is provided for each of these entities.
Evidence Used to Assess Conformance:	Sections 1.3 and 1.4 of the PIR.
Findings:	By listing the Project Proponents and other entities with major roles in the project, along with explanations of duties and contact information, this indicator was adequately addressed.

Indicator G4.2 - Document key technical skills that will be required to implement the project successfully, including community engagement, biodiversity	The PIR addresses this indicator by listing the entities involved in the project, a description of the entity, including the skills and experience of the people who run it, and the project duties that are that entity's responsibility.

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.	Skills listed as required for the project include: International project development experience. Forestry Remote Sensing/GIS Finance and marketing Forest monitoring & field measurements Community outreach/education
Evidence Used to Assess Conformance:	Sections 1.3 and 1.4 of the PIR.
Findings:	Roles, responsibilities and skills of the various entities involved in the project are explained. However some entities are described as having some similar duties as other entities. For example, both PT Pandu Maha Wana and World Education are responsible for "community development."
Clarification Request (CL):	Please more clearly explain which duties are the responsibilities of which entity, especially when similarly named duties are the responsibilities of different entities.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	PT Pandu Maha Wana has responsibility for ALL field implementation, including work actually done by World Education, in this case ensuring the contract is followed and deliverables are what is expected. Additionally, since the WE contract is only for 4 professionals, we are supplementing those with village community development staff that will assist WE in implementing their programs within their villages. I added this at the end of the last sentence regarding PMW roles and responsibilities: "including the compliance of subcontracts in the field such as that with World Education and consultant doing the boundary demarcation."
Evidence Used to Close CL:	The explanation provided makes responsibilities and relationships of the parties clear.
Date Closed:	04 May 2015

Indicator G4.3 - Include a plan to provide orientation and training for the project's employees and relevant people from the communities with an objective of building locally useful skills and knowledge to increase local participation in project implementation. These capacity building efforts should target a wide range of people in the communities, including minority and underrepresented groups. Identify how training will be passed on to new workers when there is staff turnover, so that local capacity will not be lost. Describe training provided for the project's employees and relevant people	The PIR describes the process used to hire the fire crews/deforestation monitors. Position announcements were distributed one month before hiring and interviews were conducted. During the site visit, position announcements were seen posted on a community bulletin board in Maura Dua. The PIR states that no women applied for the positions, but that is largely due to the hard labor involved in firefighting. Community development staff will be hired from each village, and efforts will be made to attract female workers. It should be noted that while no full-time community based female employees yet work for the project, many women are employed on a part-time basis for replanting activities,

from the communities. *Describe how people from the communities have been given equal employment opportunities*. Describe the implementation of measures to inform workers of risks to their safety and to minimize such risks (see G4.3-4 & G4.6).	at wages generally higher than those available for low skilled jobs in Sampit. Also, Jakarta and Sampit staff include three women, one of whom was recently promoted from administrative assistant to Infinite Earth Photographer and a stakeholder relations position (Melita Ruchiyat). Worker safety training has been informal, with discussions with new employees upon hiring. SOPs are in development for formalized safety training. Personal protective equipment and first aid kits are in each permanent field office.
Evidence Used to Assess Conformance:	Section 2.6 of the PIR, interviews and observations during site visit.
Findings:	No plan for worker training and orientation appears to be in place at this time. No capacity building efforts are described.
Non-conformance Request (NCR):	Please review indicator G4.3 in the CCB Standards, 2nd edition. Describe training provided by the project that support capacity building in the local communities. These may include firefighting and suppression techniques, basic skills in running a small business, introduction to new crops and cultivation techniques and practices, etc. During the site visit, it was clear to the auditors that capacity building and training efforts were occurring in several areas. Describe these efforts in the PIR.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	The PIR has been updated to include additional information on both employee and village training and capacity building.
Evidence Used to Close NCR:	Section 2.2 of the version of the monitoring report received 18 April 2015 includes descriptions of the various capacity building efforts and activities provided through the project.
Date Closed:	04 May 2015

Indicator G4.4 - Show that people from the communities will be given an equal opportunity to fill all employment positions (including management) if the job requirements are met. Project proponents must explain how employees will be selected for positions and where relevant, must indicate how local community members, including women and other potentially underrepresented groups, will be given a fair chance to fill positions for which they can be trained.	The PIR describes the process used to hire the fire crews/deforestation monitors. Position announcements were distributed one month before hiring and interviews were conducted. During the site visit, position announcements were seen posted on a community bulletin board in Maura Dua. The PIR states that no women applied for the positions, but that is largely due to the hard labor involved in firefighting. Community development staff will be hired from each village, and efforts will be made to attract female workers. It should be noted that while no full-time community based female employees yet work for the project, many women are employed on a part time basis for replanting activities, at wages generally higher than those available for low

	skilled jobs in Sampit. Also, Jakarta and Sampit staff include three women, one of whom was recently promoted from administrative assistant to Infinite Earth Photographer and a stakeholder relations position (Melita Ruchiyat). In addition to the observation that women were hired for temporary replanting jobs, it was noted that shelters were set up in the field that allowed women to bring young children, to be cared for in a sort of field day care operation. Very notably, during an interview, Imam Marto of Maura Dua stated that the most important community benefit generated by the Rimba Raya project was the new income opportunities for women, including tree planting and sales of handicrafts.
Evidence Used to Assess Conformance:	Section 2.6 of the PIR, site visit interviews and observations.
Findings:	The intentions of the Project Proponents, to hire local community members, including women, without regard to social standing or social group, are clear to the auditors. The number of women signing up to be firefighters is a poor gauge of the projects efforts to hire women, since female firefighters are rare in all societies.

Indicator G4.5 - Submit a list of all relevant laws and regulations covering worker's rights in the host country. Describe how the project will inform workers about their rights. Provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved.	The PIR lists the following applicable laws regarding employment: • UU No. 13/2003 • C81 – Labour Inspection Convention, 1947 • C87 – Freedom of Association and Protection of the Right to Organise Convention, 1948 • C98 – Right to Organise and Collective Bargaining Convention, 1949 • C100 – Equal Remuneration Convention, 1951 • C102 – Social Security (Minimum Standards) Convention, 1952 • C105 – Abolition of Forced Labour Convention, 1957 • C111 – Discrimination (Employment and Occupation) Convention, 1958 • C138 – Minimum Age Convention, 1973 • C169 – Indigenous and Tribal Peoples Convention, 1989 • C182 – Worst Forms of Child Labour Convention, 1999 The PIR goes on to say that the project will exceed all labor requirements and ensure all are told of their rights. It states all employees sign an employment agreement and are provided a copy of company regulations and are apprised of their rights.
Evidence Used to Assess Conformance:	Section 3.1 of the PIR, site visit interviews
Findings:	Interviews on site back the statements in the PIR that employees are informed of their rights in the case of

	regular employees. One temporary employee, a tree planter, said she was not informed of her rights as a worker.
Non-conformance Request (NCR):	Please include a plan that will inform all employees, whether temporary tree planters or regular part and fulltime employees, of their rights as workers, or explain the exception with this worker.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	Employees in Indonesia are classified into either PKWT (contract) or PKWTT (permanent) and the tree planters (as well as other employees not yet in permanent status) are included in the PWKT category. The Indonesian Labor Law – Act 13 of 2003 provides for two types of contracts for PKWT workers, oral or written (Article 59(1)). The **DECREE OF MINISTER OF MANPOWER AND TRANSMIGRATION REPUBLIC OF INDONESIA NUMBER: KEP.100/MEN/VI/2004 REGARDING PROVISIONS ON THE IMPLEMENTATION OF CERTAIN TIME WORK AGREEMENT** goes on to further define PKWT requirements Daily or Casual Employment Agreements in Chapter V, Articles 10, 11 and 12 with the last article covering the minimum requirements for agreements. We keep a daily roster with all the things required by the law, plus we also ask each casual employee to sign a Daily Employment Agreement that is not required by law. Compliance is achieved by daily onsite monitoring of activities and employer/employee relationships.
Evidence Used to Close NCR:	Daily Employment Agreement, Payment System Replanting Muara Dua were provided to the auditors, showing that temporary employees are informed of their rights when hired.
Date Closed:	12 May 2015

Indicator G4.6 - Comprehensively assess situations and occupations that pose a substantial risk to worker safety. A plan must be in place to inform workers of risks and to explain how to minimize such risks. Where worker safety cannot be guaranteed, Project Proponents must show how the risks will be minimized using best work practices.	Worker safety training has been informal, with discussions with new employees upon hiring. SOPs are in development for formalized safety training. Personal protective equipment and first aid kits are in each permanent field office.
Evidence Used to Assess Conformance:	Section 2.6 of the PIR, site visit interviews and observations
Findings:	Safety equipment, including first aid kits and hard hats, were seen in the permanent field offices, but no formal, project-wide worker safety plan or training appears to be in place. In addition, while several workers who were interviewed during the site visit stated they received training and were informed of their rights as workers, a temporary worker stated she received no training, nor was she informed of her rights as a worker.
Non-conformance Request (NCR):	Please provide a full assessment of the risks faced by

	project employees in their occupations and explain how each of these risks is minimized or otherwise dealt with. Please provide the formal training plan, or demonstrate how one has been followed.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	*No response provided.*
Findings:	No risk assessment or training plan was located in the recent documents provided.
Non-conformance Request (NCR):	Please revisit above NCR and provide the requested documentation.
Date Issued:	12 May 2015
Project Proponent Response/Actions and Date:	A full assessment of the risks faced by the project employees has been recently updated following the request from the verifier. This table of risks and explanation of how each of te risks is minimized or otherwise dealt with is provided in support of this response. Additionally the formal training plan of the Rimba Raya employees for the next 12 months is also provided.
Evidence Used to Close NCR:	The project proponent conducted a reassessment of risks faced by employees and visitors that is exhaustive, and provided a summary table of risks and actions to mitigate those risks. These risks range from work-related injuries to splinters from walking on wooden floors.
Date Closed:	26 June 2015

Indicator G4.7 - Document the financial health of the implementing organization(s) to demonstrate that financial resources budgeted will be adequate to implement the project.	The PIR states that the Project Proponents have had carbon revenues since 2013 through several sales, and that sufficient funds are available to conduct the project.
Evidence Used to Assess Conformance:	Section 2.5 of the PIR.
Findings:	No budget for recent and current expenses provided, no *pro forma*, no documentation of organization's solvency.
Non-conformance Request (NCR):	Please provide documentation to demonstrate the financial health of the Project Proponent and the project.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	The current project budgets have been provided in response to this NCR.
Evidence Used to Close NCR:	Rimba Raya Financial Report.xlsx in response folder CCBG4.7 indicates more than sufficient funds to implement the project.
Date Closed:	12 May 2015

12.5 G5 Legal Status and Property Rights

Indicator G5.1 - Submit a list of all relevant national and local laws and regulations in the host country and all applicable international treaties and agreements. Provide assurance that the project will comply with these and, where relevant, demonstrate how compliance is	The national and local laws listed all pertain to labor. (see G4.5). In Indonesia, the government owns all land and grants rights of use. The PIR states all laws will be followed or exceeded. Employees will be informed of their rights upon hiring.

achieved.	Indonesia is not a party to any emissions limiting treaties or regulations.
Evidence Used to Assess Conformance:	Sections 3.1, 3.2 and 3.3 of the PIR, site visit.
Findings:	Employees are generally informed of their rights. Interviews in the project zone and in Sampit indicated that both regular and temporary employment with the project yielded higher salaries than could be gotten elsewhere.
Non-conformance Request (NCR):	As per G4.5, please ensure that temporary employees are informed of their rights as workers.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	Please see response for G4.5.
Evidence Used to Close NCR:	Temporary worker agreements, provided to the auditors, inform these workers of their rights. Permanent jobs also require work agreements that inform the worker of his/her rights.
Date Closed:	12 May 2015

Indicator G5.2 - Document that the project has approval from the appropriate authorities, including the established formal and/or traditional authorities customarily required by the communities.	The PIR provides a map of the project area and a Table showing the agreements securing rights to the Project Proponents. During the site visit, final documentation showing the location of permanent concrete markers, spaced every 100 meters, depicting the project area boundaries (but not the carbon accounting area, which is smaller) was in the process of being signed by the various levels of government in Indonesia. Visits with both traditional community leaders and officials of the Indonesian government indicated the Project Proponents had approval from all levels of government and leadership, from the Bupati to local elected leaders, traditional leaders and religious leaders.
Evidence Used to Assess Conformance:	Sections 3.1 and 3.2 of the PIR, observations and interviews during the site visit.
Findings:	Subjects of interviews during the site visit with government officials left the auditors with no question that the Project Proponents have approval from all levels of authority for the project.
Clarification Request (CL):	Please list the levels of government and the traditional leadership from which the project has received approval in the PIR.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	*No response provided.*
Findings:	The Project Proponent has separately indicated they do not believe “approval” is required and suggested “support” instead. Although Indicator G5.2 requires project’s demonstrating “approval,” the verifiers will accept “support,” as that is more customary to the local traditions. However, the requested listing of government/traditional authority providing this support for the project has not been provided.
Clarification Request (CL):	Please revisit the original CL and current Finding to

	provide a list of government/traditional support for the project.
Date Issued:	12 May 2015
Project Proponent Response/Actions and Date:	In response to this clarification request the Project Proponent provided two signed village 'agreements'; one for Ulak Batu and Muara Dua. To date 6 out of 10 villages have signed an 'agreement', 2 villages are awaiting the completion of elections which were to be held in May prior to signing the agreement. The agreement with Cempaka Baru is still being negotiated because of how long it took us to make inroads with the village government and the socialization of our programs in Pematang Limau did not begin until May of this year but we hope to have all signed by the end of this year. The verifiers attended meetings with te district council were support for the project was clearly stated verbally as well as by the number of people from various local government departments that attended the meeting. Additionally the National government support is clear through the signing of the ERC license.
Evidence Used to Close CL:	Agreements between Rimba Raya and the local communities of Maura Dua and Ulak Batu have been provided to the auditors. The lack of written support from all communities is explained quite reasonably. The site visit confirmed that there was overwhelming support from the local communities for the project and its associated activities.
Date Closed:	26 June 2015

Indicator G5.3 - Demonstrate with documented consultations and agreements that the project will not encroach uninvited on private property, community property, or government property and has obtained the free, prior, and informed consent of those whose rights will be affected by the project.	The PIR states that no people are required to relocate by the project, and local access to the area for fishing and collection of forest products is still allowed. The PIR further states that the project would never relocate anyone who could conceivably encroach on project lands.
Evidence Used to Assess Conformance:	Section 3.7 of the PIR, site visit observations.
Findings:	The statements by the Project Proponents that they will not relocate anyone, and the observation during the site visit that no one lives on project lands is sufficient evidence that this indicator has been met.

Indicator G5.4 - Demonstrate that the project does not require the involuntary relocation of people or of the activities important for the livelihoods and culture of the communities. If any relocation of habitation or activities is undertaken within the terms of an agreement, the Project Proponents must demonstrate that the agreement was made with the free, prior, and informed consent of those concerned and includes provisions	The PIR states that no one is required to relocate due to the project, and that the Project Proponents will never require anyone to relocate from project lands. The site visit indicated that no one lived on the project lands, but only camped there for short periods of time.

for just and fair compensation.	
Evidence Used to Assess Conformance:	Section 3.7 of the PIR, site visit observations
Findings:	This indicator was adequately addressed.

Indicator G5.5 - Identify any illegal activities that could affect the project's climate, community or biodiversity impacts (e.g., logging) taking place in the project zone and describe how the project will help to reduce these activities so that project benefits are not derived from illegal activities.	The illegal activities that may be conducted within the project area include illegal logging and drainage by oil palm companies. Neither of these activities could benefit the project, and could potentially reduce carbon offset credits. Monitoring will be used to reduce both illegal activities. Monitoring by OFI has been shown to reduce incursions and natural threats.
Evidence Used to Assess Conformance:	Section 3.8 of the PIR, observations during site visit.
Findings:	Illegal activity will clearly not benefit the project and its goals. Monitoring on the northern boundary of the project has already detected and stopped illegal logging and draining within project boundaries. This indicator was adequately addressed.

Indicator G5.6 - 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.	The PIR provides a map of the project area and a Table showing the agreements securing rights to the Project Proponents. During the site visit, final documentation showing the location of permanent concrete markers, spaced every 100 meters, depicting the project area boundaries (but not the carbon accounting area, which is smaller) was in the process of being signed by the various levels of government in Indonesia.
Evidence Used to Assess Conformance:	Section 3.2 of the PIR, observations and interviews during the site visit.
Findings:	Subjects of interviews during the site visit with government officials left the auditors with no question that the Project Proponents possess the carbon and land use rights to the project area. Several government meetings revolved around signing the map depicting the concrete marker boundaries of the project area.
Non-conformance Request (NCR):	Please provide to the auditors copies of the additional documents granting carbon rights to the Project Proponents for our records.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	*No response provided.*
Evidence Used to Close NCR:	Documents granting the Project Proponents the rights to the timber and ecosystem of the Rimba Raya lands to PT. Rimba Raya were provided, as well as agreements with the national park and the agent of deforestation. These documents were reviewed and sufficiently show the

	Project Proponents rights to the carbon resource.
Date Closed:	12 May 2015

12.6 CL1 Net Positive Climate Impacts

Indicator CL1.1 - Estimate the net change in carbon stocks due to the project activities using the methods of calculation, formulae and default values of the IPCC 2006 GL for AFOLU or using a more robust and detailed methodology. The net change is equal to carbon stock changes *with* the project minus carbon stock changes *without* the project (the latter having been estimated in G2). This estimate must be based on clearly defined and defendable assumptions about how project activities will alter GHG emissions of carbon stocks over the duration of the project or the project GHG accounting period.	Please see results from concurrent VCS verification.
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

Indicator CL1.2 - Estimate the net change in the emissions of non-CO2 GHG emissions such as CH4 and N2O in the *with* and *without* project scenarios if those gases are likely to account for more than a 5% increase or decrease (in terms of CO2-equivalent) of the project's overall GHG emissions reductions or removals over each monitoring period.	Please see results from concurrent VCS verification.
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

Indicator CL1.3 - Estimate any other GHG emissions resulting from project activities. Emissions sources include, but are not limited to, emissions from biomass burning during site preparation, emissions from fossil fuel combustion, direct emissions from the use of	Please see results from concurrent VCS verification.

synthetic fertilizers, and emissions from the decomposition of N-fixing species.	
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

Indicator CL1.4 - Demonstrate that the net climate impact of the project is positive. The net climate impact of the project is the net change in carbon stocks plus net change in non-CO2 GHGs where appropriate minus any other GHG emissions resulting from project activities minus any likely project-related unmitigated negative offsite climate impacts (see CL2.3).	Please see results from concurrent VCS verification
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

Indicator CL1.5 - Specify how double counting of GHG emissions reductions or removals will be avoided, particularly for offsets sold on the voluntary market and generated in a country with an emissions cap.	Please see results from concurrent VCS verification.
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

12.7 CL2 Offsite Climate Impacts ("Leakage")

Indicator CL2.1 - Determine the types of leakage that are expected and estimate potential offsite increases in GHGs (increases in emissions or decreases in sequestration) due to project activities. Where relevant, define and justify where leakage is most likely to take place.	Please see results from concurrent VCS verification.
Evidence Used to Assess Conformance:	

Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

Indicator CL2.2 - Document how any leakage will be mitigated and estimate the extent to which such impacts will be reduced by these mitigation activities.	Please see results from concurrent VCS verification.
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

Indicator CL2.3 - Subtract any likely project-related unmitigated negative offsite climate impacts from the climate benefits being claimed by the project and demonstrate that this has been included in the evaluation of net climate impact of the project (as calculated in CL1.4).	Please see results from concurrent VCS verification.
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

Indicator CL2.4 - Non-CO2 gases must be included if they are likely to account for more than a 5% increase or decrease (in terms of CO2-equivalent) of the net change calculations (above) of the project's overall off-site GHG emissions reductions or removals over each monitoring period.	Please see results from concurrent VCS verification.
Evidence Used to Assess Conformance:	
Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

12.8
12.9 CL3 Climate Impact Monitoring

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

Indicator CL3.2 - Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.	Please see results from concurrent VCS verification.
Evidence Used to Assess Conformance:	

Findings:	
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

12.10 CM1 Net Positive Community Impacts

Indicator CM1.1 - Use appropriate methodologies to estimate the impacts on communities, including all constituent socio-economic or cultural groups such as indigenous peoples (defined in G1), resulting from planned project activities. A credible estimate of impacts must include changes in community well-being due to project activities and an evaluation of the impacts by the affected groups. This estimate must be based on clearly defined and defendable 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.	The PIR states that the net community benefits during the monitoring period essentially amounted to the ecosystem services provided by the project lands, which would have been eliminated in the 'without project' scenario. Additional community benefits are listed in Table 22: • Employment opportunities (through various means, listed separately in the Table) • Efficient, low-emissions cook stoves • Solar lighting • Community based agroforestry • Community centers (planning stage) • Extend World Education's programs (planning stage) • Micro-credit program (planning stage) • Sustainable healthcare In the months after the close of the monitoring period, project hiring and other activities, including the building of community centers, began and activity appears to be accelerating, according to observations made during the site visit.
Evidence Used to Assess Conformance:	Section 7.1 of the PIR, site visit observations.
Findings:	This indicator calls for a comparison between the 'with' and 'without' project impacts on communities to show that the net impacts are positive. This is done with regard to ecosystem services, but a comparison between the other social activities and income opportunities in the 'with project' scenario and the alternative oil palm plantation scenario is lacking in this Section.
Non-conformance Request (NCR):	Please include a comparison between the benefits of oil palm plantations and those being derived from the project. Certainly the plantations have the potential of supplying work opportunities. How do they compare to opportunities created by the project? Some indicators have repetitive themes. If parts of an indicator were addressed elsewhere in the monitoring report, please refer to those Sections, if more convenient.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	*No response provided.*

Findings:	There was no response provided by the Project Proponent.
Non-conformance Request (NCR):	As there was no response provided, please re-visit the original NCR and provide a response and PIR update.
Date Issued:	12 May 2015
Project Proponent Response/Actions and Date:	Additional text has been added to Section 7.1 of the PIR. This text expands on material provided in the validated Project Description Document to address the specific requests of the verifiers.
Evidence Used to Close NCR:	The project proponent provided a number of documents explaining the benefits of the Rimba Raya project to the local communities, which were largely confirmed during the site visit. A "benefits report" from an NGO by the name of World Growth was also provided, titled, "The Economic Benefits of Palm Oil to Indonesia." The report largely focuses on the benefits of palm oil to the regional and national economy, but also speaks of large chunks of the industry (41%) being dominated by small holders. There is talk of the potential of palm oil to bring the local communities out of poverty. Potential to benefit local communities and the actual reality differ significantly. The facts on the ground in the area around the Rimba Raya project tell a different story. A local leader in a community beyond the Rimba Raya project zone was interviewed. He spoke of the palm oil industry encroaching on his community's palm oil plantation lands and intimidation from armed groups when he protested these encrouchments. In addition, it was observed that the industrial palm oil plantations prefer to import workers from other islands, rather than people from the local communities. Also, the dominant land use in lands surrounding Rimba Raya are already dedicated to palm oil production, yet the communities were still in poverty, in spite of the supposed great potential of palm oil to alleviate local poverty. Several reports regarding the palm oil industry and local growers and communities were also provided, outlining the disparity between the professed potential benefits of palm oil production to local communities and the benefits received by local communities. The Rima Raya project has already lifted the average family in the communities above the national poverty line, even though the project is in its early stages. The palm oil plantations, in existence for years, failed to do so. The updated version of the monitoring report (VCS CCB Monitoring Implementation Reort-M3_secondroundV2.pdf) includes direct comparisons between the project and without project scenarios,

Date Closed:	26 June 2015

Indicator CM1.2 - Demonstrate that no High Conservation Values identified in G1.8.4-6 will be negatively affected by the project.	This indicator was not addressed in Section 7.1. However, community-related HCVs are dependent on an intact peat dome ecosystem on project lands, which the project provides.
Evidence Used to Assess Conformance:	Section 7.1 of the PIR, familiarity with the project and HCVs.
Findings:	It is highly unlikely that the project could negatively affect community-related HCVs, but this indicator was not addressed.
Non-conformance Request (NCR):	Please list the community-related HCVs provided by the project lands and show that the project will not have a negative impact on them.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	*No response provided.*
Evidence Used to Close NCR:	Community-related HCVs were listed in the version of the monitoring report that was received on 18 April 2015. HCV 5 is possessed by the project lands – it provides forest products, water and food for communities. Project lands are unlikely to have HCV 6. Preservation of the natural forest will not have negative impacts on HCVs that depend on the preservation of the natural forest.
Date Closed:	04 May 2015

12.11 CM2 Offsite Stakeholder Impacts

Indicator CM2.1 - Identify any potential negative offsite stakeholder impacts that the project activities are likely to cause.	The PIR lists the following potential negative impacts on offsite stakeholders: • Threats to subsistence livelihoods (fishing, selective wood extraction) • Hunting for deer • Employment with oil palm plantations Subsistence use of the forest for fishing and wood extraction is not stopped with the project, but it would necessarily stop with conversion to oil palm. Deer hunting is not prevented, but it was found hunters set fire to land to improve forage for deer. An alternative suggested is to farm deer for protein until wild populations can be built back up. Employment opportunities with the oil plantations are fairly low, because the plantations prefer to bring in migrant workers. Employment with the project is reported to include 23 local villagers, with an additional 20 to be hired and another 33 seasonal staff hired. Many of these people may already have been hired, judging by numbers seen during the site visit.
Evidence Used to Assess Conformance:	Section 7.2 of the PIR, site visit observations and interviews.

Findings:	Restrictions on use of the project lands are minimal with respect to fishing and hunting, and are not prohibitive for wood products. Massive replanting operations for trees was taking place during the site visit, which will replenish wood taken over the years, and create an additional buffer. Also, replanting operations caused the hiring of many local community members, including women with young children, and income opportunities for growing and selling seedlings for/to the project. Negative impacts are few, minor, and are easily mitigated by the project.

Indicator CM2.2 - Describe how the project plans to mitigate these negative offsite social and economic impacts.	Mitigation is described above. Income opportunities through the oil palm plantations are few for local communities, and their loss is easily mitigated through income opportunities available through the project. Any loss of access to wood products would have occurred in the without project scenario, but much more quickly, and without mitigation. Massive planting operations outside the carbon accounting area, but within project boundaries, will provide products for local use for many years to come.
Evidence Used to Assess Conformance:	Section 7.2 of the PIR.
Findings:	Negative social and economic impacts are few and minor. They are easily mitigated by project activities.

Indicator CM2.3 - Demonstrate that the project is not likely to result in net negative impacts on the well-being of other stakeholder groups.	There are no other negative impacts anticipated by project activities.
Evidence Used to Assess Conformance:	Section 7.2 of the PIR, the nature of the project.
Findings:	Leaving a landscape naturally intact has few negative consequences beyond lost economic opportunities. Economic opportunities from large scale oil palm operations do not reach local communities, or reach them only in minimal ways, and eliminate the local community's use of the land. There is no reason to believe the oil palm company's well-being has suffered as a result of the project.

12.12 CM3 Community Impact Monitoring

Indicator CM3.1 - Develop an initial plan for selecting community variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project's community development objectives and to anticipated impacts (positive and negative).	Section 5.1.4, Table 11, lists parameters that will be monitored on a biannual basis, centering on the community. They are directly related to expected community benefits.
Evidence Used to Assess Conformance:	Section 5.1.4 of the PIR.
Findings:	A community monitoring plan is in existence.

Indicator CM3.2 - Develop an initial plan	The HCVs related to community well-being are conserved

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.	by conserving the natural landscape and preventing its drainage and conversion to oil palm plantation. In addition to climate monitoring, which will also monitor for the maintenance of the community related HCVs, plans in Table 11 include mapping community-related HCVs.
Evidence Used to Assess Conformance:	Sections 5.1 and 7.1 of the PIR.
Findings:	Remote sensing is likely to be sufficient to monitor community-related HCVs. No explanation regarding mapping plans or the state of those plans.
Clarification Request (CL):	Please provide additional detail regarding the mapping of community related HCVs, the state of this activity and its intended use.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	*No response provided.*
Findings:	There was no response provided by the Project Proponent.
Clarification Request (CL):	As there was no response provided, please re-visit the original NCR and provide a response and PIR update.
Date Issued:	12 May 2015
Project Proponent Response/Actions and Date:	The response to CM1.2 in the first round combined with additional material included in Section 7.1 of the PIR outlined the detail in relation to mapping of community related HCV. This text explained the plan for HCV mapping and the current progress against that plan.
Evidence Used to Close NCR:	Sections 2.2, 2.7, 5.1.4, and 7.1 of the updated monitoring report explain that community mapping has been initiated, but not during the monitoring period encompassed by this verification. Most of the work is planned for 2015. Some preliminary community mapping was done and shown to auditors during the site visit.
Date Closed:	26 June 2015

Indicator CM3.3 - Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders. Include parameters for assessing anticipated and actual impacts (positive and negative) on communities and biodiversity resulting from the project activities (see CM3 & B3)	A full monitoring plan had been devised, according to investigation during the previous verification, and parameters to be monitored are listed in Table 11. No further discussion of community monitoring was provided, which the verifier assumes is because none had been conducted during the monitoring period.
Evidence Used to Assess Conformance:	Section 5.1 of the PIR.
Findings:	A full monitoring plan is in place, but no update or mention of the timing of the next community surveys was provided.
Clarification Request (CL):	Please provide scheduling information for upcoming community monitoring events.

Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	*No response provided.*
Evidence Used to Close NCR:	The monitoring report states that monitoring events will be reported bi-annually, so it is assumed that monitoring will occur bi-annually, as well. Clarification withdrawn.
Date Closed:	12 May 2015

12.13 B1 Net Positive Biodiversity Impacts

Indicator B1.1 - Use appropriate methodologies to estimate changes in biodiversity as a result of the project in the project zone and in the project lifetime. This estimate must be based on clearly defined and defendable 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.	Biodiversity impacts from the project are net positive. Without the project, the natural forest habitat which supports significant populations of endangered species would be completely eliminated through land clearing, drainage and conversion to oil palm. Tanjung Puting National Park would lose its buffer on its eastern border, resulting in new incursions for illegal logging and oil palm encroachment.
Evidence Used to Assess Conformance:	Section 8.1 of the PIR and other segments of the PIR, as well as site visit observations regarding the pervasiveness of oil palm plantations and the aggressive nature of expanding these plantations beyond their legal boundaries.
Findings:	The biodiversity impact of the project is clearly positive, especially in light of the 'without project' scenario.

Indicator B1.2 - Demonstrate that no High Conservation Values identified in G1.8.1-3 will be negatively affected by the project.	All biodiversity related HCVs rely upon the maintenance of a relatively unaltered landscape on project lands. Conserving the natural landscape is the primary goal and activity of the project. All other activities are designed to support that goal.
Evidence Used to Assess Conformance:	Section 8.1 of the PIR and numerous other Sections of the PIR describing project activities, site visit observations
Findings:	The protection of biodiversity HCVs is the primary goal of the project, and they will not be negatively affected by project activities.

Indicator B1.3 - Identify all species to be used by the project and show that no known invasive species will be introduced into any area affected by the project and that the population of any invasive species will not increase as a result of the project.	Not addressed in Section 8.1 of the PIR.
Evidence Used to Assess Conformance:	Section 8.1 of the PIR, site visit observations and interviews.
Findings:	This is not directly addressed in Section 8.1 of the PIR. A number of native tree species were being grown in nurseries and planted in the project area (outside the carbon accounting area) during the site visit. However, a list of these species was not provided.

Non-conformance Request (NCR):	Please provide a list of all species being used in project activities and fully reply to indicator B1.3.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	*No response provided.*
Evidence Used to Close NCR:	Lists of the species planted were provided to the auditors. They are native to south central Borneo.
Date Closed:	12 May 2015

Indicator B1.4 - Describe possible adverse effects of non-native species used by the project on the region's environment, including impacts on native species and disease introduction or facilitation. Project proponents must justify any use of non-native species over native species	Not addressed in Section 8.1. The only non-native species discussed during the site visit were rubber trees. No potential impacts were discussed.
Evidence Used to Assess Conformance:	Section 8.1 of the PIR, observations during the site visit.
Findings:	This indicator is not addressed in Section 8.1.
Non-conformance Request (NCR):	Please state whether any non-native species are being used in the project, and justify their use, as required by B1.4.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	*No response provided.*
Evidence Used to Close NCR:	Lists of the species planted were provided to the auditors. They are native to south central Borneo.
Date Closed:	12 May 2015

Indicator B1.5 - Guarantee that no GMOs will be used to generate GHG emissions reductions or removals.	Not addressed.
Evidence Used to Assess Conformance:	Version 1.2 of the PIR.
Findings:	The use or non-use of GMOs is not addressed in the PIR.
Non-conformance Request (NCR):	Please pledge that no GMOs will be used to generate emissions reductions or removals for the project.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	Fully agree, plus GMOs are illegal to be used in Indonesia.
Evidence Used to Close NCR:	Section 8.1 of the version of the monitoring report received on 18 April 2015 includes a statement that no GMOs will be used to generate emissions reductions and removals.
Date Closed:	05 May 2015

12.14 B2 Offsite Biodiversity Impacts

Indicator B2.1 - Identify potential negative offsite biodiversity impacts that the project is likely to cause.	The only offsite biodiversity impacts the project is likely to cause would be as a result of leakage.
Evidence Used to Assess Conformance:	Section 8.2 of the PIR, the nature of an avoided conversion project.
Findings:	Project activities are unlikely to create any negative offsite biodiversity impact, unless it is related to leakage, which is being actively monitored.

Indicator B2.2 - Document how the project plans to mitigate these negative offsite biodiversity impacts.	Mitigation amounts to monitoring activity shifting leakage, and also to document illegal logging operations to find out its origination so it can be dealt with legally. Mitigation also includes providing income opportunities to local residents. It is noted that potential offsite negative impacts would be very unlikely to match the positive biodiversity impacts offsite – especially regarding the protection offered to the national park, by virtue of creating a buffer.
Evidence Used to Assess Conformance:	Section 8.2 of the PIR, the nature of an avoided conversion project.
Findings:	Negative offsite biodiversity impacts may occur, but they will be documented and it is almost impossible that they tip the balance of biodiversity impacts from the project into the "net negative" zone.

Indicator B2.3 - Evaluate likely unmitigated negative offsite biodiversity impacts against the biodiversity benefits of the project within the project boundaries. Justify and demonstrate that the net effect of the project on biodiversity is positive.	The unmitigated, negative offsite biodiversity impacts are related to leakage. Even if the oil palm company converted an area of the same size as the Rimba Raya project, net onsite and offsite biodiversity benefits would be positive because the project area provides an actively patrolled buffer on the national park's unprotected eastern boundary. Further habitat degradation in the national park will be curtailed.
Evidence Used to Assess Conformance:	Section 8.2 of the PIR, the nature of the project.
Findings:	Even in the worst case scenario, of leakage being so great that an equal amount of land to the project area was converted, the location of the project area creates a buffer between destructive human activity and the national park.

12.15 B3 Biodiversity Impact Monitoring

Indicator B3.1 - Develop an initial plan for selecting biodiversity variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project's biodiversity objectives and to anticipated impacts (positive and negative).	A full monitoring plan was developed.
Evidence Used to Assess Conformance:	Section 5.1 of the PIR, successful validation and previous verification of the project.
Findings:	This indicator was adequately addressed during validation, and does not need to be revisited here.

Indicator B3.2 - Develop an initial plan for assessing the effectiveness of measures used to maintain or enhance High Conservation Values related to globally, regionally or nationally significant biodiversity (G1.8.1-3) present	An initial plan was developed and included in the project PD and the previous PIR. It is not mentioned in the current PIR.

in the project zone.	
Evidence Used to Assess Conformance:	Section 5.1 of the PIR.
Findings:	This indicator was previously addressed during the validation and first verification period.
Clarification Request (CL):	Please provide a reference and update to the monitoring plan developed for the project.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	Reference to the initial plan has been added at the start of section 5.
Evidence Used to Close NCR:	The version of the monitoring plan received on 18 April 2015 includes the requested reference.
Date Closed:	05 May 2015

Indicator B3.3 - Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.	The full monitoring plan was developed and is available on the CCBA website. Much of the monitoring is dependent on assessing the forest condition via remote sensing, and is conducted annually, semi-annually or continuously. Other monitoring components include: OFI's orangutan survey Ground patrols Water quality monitoring Botanical surveys Avifaunal surveys Full HCV assessment
Evidence Used to Assess Conformance:	Section 5.1 of the PIR.
Findings:	The monitoring plan is in place, but no updates are provided regarding the state of or results from biodiversity surveys.
Non-conformance Request (NCR):	Please provide any updates available on biodiversity surveys, or state when the surveys will be complete and results made available to interested stakeholders.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	A preliminary biodiversity survey is in the process of being conducted with 5 out of the 7 transects completed and 2 not yet due to access and water levels. These last 2 will be completed after the rainy season is over and water levels recede, plus additional transects will be included in areas that currently the information is not as solid. The goal is to have all completed, analyzed and a biodiversity survey report finished by August of 2015.
Evidence Used to Close NCR:	The above update was also included in the version of the monitoring report received 18 April 2015.
Date Closed:	05 May 2015

13 GOLD LEVEL SECTION

GL1 Climate Change Adaptation Benefits

Indicator GL1.1 - Identify likely regional climate change and climate variability scenarios and impacts, using available studies, and identify potential changes in the local land-use scenario due to these climate change scenarios in the absence	The PIR identifies 4 categories of impact from expected climate change, originally identified in the validated PDD: • Food security • Income • Health

of the project.	• Biodiversity. Drought and flooding are both expected to increase, affecting food security. The natural buffer provided by the peat ecosystem would be lost without the project. Income for local residents depends on fishing, limited farming and collection of resources from local forests. All are vulnerable to climate change. Health is expected to suffer due to fire during drought, water quality will also be reduced. Fire, tree mortality, increased habitat loss and fragmentation are expected to increase.
Evidence Used to Assess Conformance:	Section 6.6 of the PIR.
Findings:	The impacts of climate change in the 'without project' scenario are reasonable.
Clarification Request (CL):	Please provide a reference to the climate change study or studies used in determining these impacts.
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	The primary resources relied upon to summarise the climate change impacts on the well-being of communities and conservation status of biodiversity were: Case et al, 2007; IPCC, 2007; Measey, 2010. These references have been added to the PIR and provided in response to this NCR.
Evidence Used to Close NCR:	Reference to the studies used was added to the version of the monitoring report received on 18 April 2015.
Date Closed:	05 May 2015

Indicator GL1.2 - Identify any risks to the project's climate, community and biodiversity benefits resulting from likely climate change and climate variability impacts and explain how these risks will be mitigated.	Risks are similar to those of the 'without project' scenario, but with the benefit of the peat forest's ecosystem services and resources. In addition, project activities are designed to minimize these risks through: • Fire suppression teams and techniques introduced • Irrigation systems • Farmer field schools and agricultural training in schools • Reforestation activities
Evidence Used to Assess Conformance:	Section 6.6 of the PIR, site visit observations and interviews.
Findings:	Risks to the project's benefits are mitigated through almost all project activities. Maintaining a usable forest with all or most ecosystem services intact is superior to the alternative of facing impacts of environmental change with a compromised landscape that is no longer available to local communities for resources or services.

	Agricultural education classes provided through project funding were observed during the site visit. The general enthusiasm for the project among the local communities was notable, especially in contrast to the previous site visit, where community members maintained a skeptical, wait-and-see attitude. This is likely due to economic benefits already reaching community members. Income diversity, crop diversity and ecosystem protection are all reasonable mitigation efforts for risks imposed due to climate change.

Indicator GL1.3 - Demonstrate that current or anticipated climate changes are having or are likely to have an impact on the well-being of communities *and/or* the conservation status of biodiversity in the project zone and surrounding regions.	The PIR identifies 4 categories of likely climate change related impacts, listed above under indicator GL1.1. It is reasonable to expect climate change will impact food production from agriculture as well as fishing, and concurrently affect income. Health effects and increased pressure on habitat are also expected. A recent change in the length of the wet season was noted, but whether this can be attributed to yearly variation or climate change is unknown at this time.
Evidence Used to Assess Conformance:	Section 6.6 of the PIR, site visit interviews.
Findings:	It is reasonable to assume that the livelihoods of people dependent on their natural environment and biodiversity health would both be affected by expected climate change impacts.
Clarification Request (CL):	Please provide a reference to the climate change study or studies used in determining these impacts. (See GL1.1)
Date Issued:	28 February 2015
Project Proponent Response/Actions and Date:	The primary resources relied upon to summarise the climate change impacts on the well-being of communities and conservation status of biodiversity were: Case et al, 2007; IPCC, 2007; Measey, 2010. These references have been added to the PIR and provided in response to this NCR.
Evidence Used to Close NCR:	References were added to the version of the monitoring report received on 18 April 2015.
Date Closed:	05 May 2015

Indicator GL1.4 - Demonstrate that the project activities will assist communities53 *and/or* biodiversity to adapt to the probable impacts of climate change.	The project activities are designed to maintain the present, natural ecosystem in the project area, which will assist both communities and biodiversity to adapt to the impacts of climate change, especially in light of the 'without project' scenario, which would eliminate the benefits of a natural, intact ecosystem. In addition, the project activities are designed to provide new income opportunities to local communities, which will alleviate any loss of income due to traditional crop loss and reduction in the fish catch. Planting activities should provide more forest resources for the future. Fire suppression provides multiple direct positive impacts. Exploring new crops provides more resilience for

	agricultural produces.
Evidence Used to Assess Conformance:	Section 6.6 of the PIR, site visit observations.
Findings:	There is little doubt that the project activities will aid both the communities and biodiversity in meeting challenges presented by climate change.

GL2 Exceptional Community Benefits

Indicator GL2.1 - Demonstrate that the project zone is in a low human development country OR in an administrative area of a medium or high human development country in which at least 50% of the population of that area is below the national poverty line.	This indicator was not addressed in the PIR.
Evidence Used to Assess Conformance:	Section 7.3 of the PIR.
Findings:	The PIR includes no demonstration of the relative economic status of the people in the project zone.
Non-conformance Request (NCR):	Please demonstrate the second part of this indicator, that 50% of the population in the project zone exists below the national poverty line. Indonesia itself is not a low human development country.
Date Issued:	28 February 2015
Project Proponent Response/Actions:	This indicator was assessed during validation, was issued a positive validation statement and is therefore is not required to be re-assessed during verification. Refer to explanatory email from VCS provided with this response.
Evidence Used to Close NCR:	Email from Sinclair Vincent, of VCS, and the project proponent, dated 25 March 2015, states that this indicator does not have to be revisited during verification. It was established during validation.
Date Closed:	12 May 2015

Indicator GL2.2 - Demonstrate that at least 50% of households within the lowest category of well-being (e.g., poorest quartile) of the community are likely to benefit substantially from the project.	This indicator was not addressed in the PIR.
Evidence Used to Assess Conformance:	Section 7.3 of the PIR.
Findings:	Section 7.3 lists and summarizes project community benefits, but does not demonstrate that benefits reach 50% of households within the poorest quartile of the community.
Non-conformance Request (NCR):	Please address indicator GL2.2
Date Issued:	28 February 2015
Project Proponent Response/Actions:	*No response provided.*
Evidence Used to Close NCR:	Email from Sinclair Vincent of VCS, and the Project Proponent, dated 25 March 2015, states that this indicator does not have to be revisited during verification. It was established during validation.
Date Closed:	12 May 2015

Indicator GL2.3 - Demonstrate that any	Not explicitly addressed in the PIR.

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.	
Evidence Used to Assess Conformance:	Section 7.3 of the PIR, interviews and observations during the site visit.
Findings:	While this indicator is not directly addressed in the PIR, observations during the site visit revealed that poor families were participating in the project's income generating activities, including growing and planting trees and craft sales. One imam in Maura Dua stated that the most important impact of the project on communities was the new income opportunities for women. Women are also accommodated in some activities by having daycare provided, so they can work.
Non-conformance Request (NCR):	Please directly address this indicator. Demonstrate that the project targets poorer households.
Date Issued:	28 February 2015
Project Proponent Response/Actions:	*No response provided.*
Evidence Used to Close NCR:	Section 7.3 of the version of the monitoring report received on 18 April 2015 explains that initial community surveys and further monitoring are geared toward finding the poorest households in order to ensure they receive project benefits. That project benefits were going to poor households and especially women was directly observed during the site visit many times.
Date Closed:	05 May 2015

Indicator GL2.4 - Demonstrate that measures have been taken to identify any poorer and more vulnerable households and individuals whose well-being or poverty may be negatively affected by the project, and that the project design includes measures to avoid any such impacts. Where negative impacts are unavoidable, demonstrate that they will be effectively mitigated.	Few negative community impacts of any sort were identified. All such impacts are less detrimental than the 'without project' scenario. However, this indicator was not directly addressed.
Evidence Used to Assess Conformance:	Section 7.3 of the PIR, site visit observations.
Findings:	During the site visit it was clear that attention is paid toward developing income opportunities for women and community members of limited means. Few, if any, negative impacts from the project on the poorest people are likely. This is not explained in this Section of the PIR, however.
Non-conformance Request (NCR):	Please address this indicator in the appropriate location in the PIR.
Date Issued:	28 February 2015
Project Proponent Response/Actions:	*No response provided.*
Evidence Used to Close NCR:	Section 7.3 of the version of the monitoring report received on 18 April 2015 includes the explanation that the project is targeting the poorest people, especially women (who are generally the poorest in the region) for help.

Date Closed:	05 May 2015

Indicator GL2.5 - Demonstrate that community impact monitoring will be able to identify positive and negative impacts on poorer and more vulnerable groups. The social impact monitoring must take a differentiated approach that can identify positive and negative impacts on poorer households and individuals and other disadvantaged groups, including women.	Table 23 of the PIR, Section 7.3 mentions that the community baseline study is underway, to ensure the poorest have been adequately identified. It also states that the effectiveness of the program will be monitored to ensure benefits are provided to the poorest, which is a group that typically includes women.
Evidence Used to Assess Conformance:	Section 7.3 of the PIR.
Findings:	Detail is lacking on the community impact monitoring.
Non-conformance Request (NCR):	Please provide some detail of the community impact monitoring to show that it has identified positive and negative impacts from the project on the poorest people.
Date Issued:	28 February 2015
Project Proponent Response/Actions:	*No response provided.*
Findings:	No response was provided, and no update was noted to this indicator in the PIR.
Non-conformance Request (NCR):	Please revisit above NCR and provide the requested information.
Date Issued:	12 May 2015
Project Proponent Response/Actions:	This response was covered by the Projects response to GL2.3 which is copied again here: The following additional text has been added to Section 7.3 - The project collected preliminary socio-economic data during the PDD development and we continue to collect this data to determine effectiveness of our programs. One of the major stated objectives of our programs is benefit the poorest people of the community the most and this data (a) allows us to identify by family who these are, and (b) focus or tailor efforts to ensure they are a major beneficiary of the results of our programs. Additionally, women in Indonesia are known to primarily be located in the poorest quartile of citizens and our programs are focused on improving their lives through employment opportunities (non-field and hard labor related) as well as specific programs such as the handicrafts made from recycled plastic in Telaga Pulang.
Evidence Used to Close NCR:	The addition of the above-mentioned text is confirmed. During the site visit, auditors witnessed women with young children involved in handicrafts in the Telaga Pulang recycling program and interviewed women in the smaller villages who were involved in tree planting. Accomodations were made for women caring for young children, even for those involved in field labor, several kilometers from their homes. It was very telling that, during a chance encounter, the Imam in Maura Dua told auditors that he considered the most important social benefit of the Rimba Raya project to be the income opportunities it was providing to women. Clearly, improving the lives of the poorest people in the project zone is one of the major focuses of the project.

Date Closed:	26 June 2015

GL3 Exceptional Biodiversity Benefits

Indicator GL3.1 – Vulnerability Regular occurrence of a globally threatened species (according to the IUCN Red List) at the site: 1.1 - Critically Endangered (CR) and Endangered (EN) species - presence of at least a single individual; or 1.2 - Vulnerable species (VU) - presence of at least 30 individuals or 10 pairs.	The PIR states that a total of 54 species listed as critically endangered or endangered by IUCN are likely present in the project area.
Evidence Used to Assess Conformance:	Section 8.3 of the PIR, observations of orangutan nests and hearing the calls of wild orangutans within the project area, during the site visit.
Findings:	Clear evidence of the presence of an endangered species in the project area during the site visit confirms this indicator.
Clarification Request (CL):	Please provide the list of endangered and critically endangered species believed to be using project area lands.
Date issued:	28 February 2015
Project Proponent Response/Actions:	Lists of endangered and critically endangered species believed to be using the project area have been added to Section 8.3 of the PIR. These lists are consistent with lists that can be found in previous project design documents and implementation reports.
Findings:	It does not appear that Section 8.3 has been updated to include the requested information.
Clarification Request (CL):	Please see the Finding and include the requested information in Section 8.3.
Date Issued:	12 May 2015
Project Proponent Response/Actions and Date:	Section 8.3 has been updated with the tables and additional text as described in the initial response.
Evidence Used to Close NCR:	The updated version of the monitoring report includes the list of endangered and vulernable species, described above.
Date Closed:	26 June 2015

OR

Indicator GL3.2 – Irreplaceability A minimum proportion of a species' global population present at the site at any stage of the species' lifecycle according to the following thresholds: 2.1 - Restricted-range species - species with a global range less than 50,000 km2 *and* 5% of global population at the site; or 2.2 - Species with large but clumped distributions - 5% of the global population	This indicator was not addressed, but in light of the presence of endangered species in the project area and the fact that the Project Proponent chose to address GL3.1, this is not applicable.

at the site; or 2.3 - Globally significant congregations - 1% of the global population seasonally at the site; or 2.4 - Globally significant source populations - 1% of the global population at the site.	