

# RIMBA RAYA BIODIVERSITY RESERVE PROJECT VCS VERIFICATION REPORT



Document Prepared By: Environmental Services, Inc.

<b>Project Title</b>	Rimba Raya Biodiversity Reserve Project
<b>Version</b>	Verification Report Version 01
<b>Report ID</b>	VO13048.00ver

<b>Report Title</b>	Rimba Raya Biodiversity Reserve Project Verification Report
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<b>Pages</b>	101
<b>Date of Issue</b>	10 December 2013
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## Summary:

Environmental Services, Inc., (ESI) was contracted by InfiniteEARTH on 25 July 2013 to conduct the second monitoring period verification (01 July 2010 to 30 June 2013) 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.

Environmental Accounting Services (EAS) is acting as technical consultant on behalf of the Project Proponent and is responsible for the monitoring and verification of the project. The Project Proponent is the legal concession holder for the project area and the signatory to a contract with EAS for this purpose. 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 preserving 64,977 hectares of tropical peat swamp forest. 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<sub>2</sub> 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 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 Report and the implementation of GHG project as stated in the validated PD for the 01 July 2010 to 30 June 2013 monitoring period (second period).

The monitoring period verification criteria followed the guidance documents provided by VCS 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), and VM0004, v1.0 – Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests.

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 3, 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 requirements for the second monitoring period.

The GHG assertion provided by InfiniteEARTH and verified by ESI has resulted in the GHG emissions reduction or removal of 8,500,628 tCO<sub>2</sub> equivalents by the project during the verification period/reporting period (01 July 2010 to 30 June 2013). This value is net of Project emissions, leakage emissions and a withholding buffer (1,526,179 tCO<sub>2</sub> equivalents) based on the non-permanence risk assessment tool.

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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 for the verification period 01 July 2010 to 30 June 2013. This project has undergone the second VCS monitoring period verification to ensure the project has been implemented and remains compliant with the *VCS Program Guide*, *VCS Standard*, *AFOLU Requirements*, 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 generally includes 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.

This second phase of verification was the result of issues pertaining to control of the project area and the time passed since the beginning of verification activities.

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 <sub>2</sub> , CH <sub>4</sub> , and N <sub>2</sub> O
Time Period (state date, crediting period, verification period)	VCS Second 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	8,500,628 CO <sub>2</sub> e

### 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 of tropical peat swamp forest. Deforestation and land conversion in Indonesia has substantially increased in recent years and now contributes to a majority of global GHG emissions. 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 palm oil 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<sub>2</sub>e 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 VERIFICATION PROCESS

### 2.1 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)

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 Second Monitoring Report.

### 2.2 Document Review

A detailed review of all project documentation was conducted to ensure consistency with, and identify any deviation from, VCS program requirements, the methodology (VM0004, v1.0), and the PD. Initial review focused on the validated PD and Monitoring Report (MR) 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 MR, 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.

### 2.3 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
<p>Birute Galdikas Orangutan Foundation International</p>	<p>We visited each of the age groups of the animals that they 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. She discussed the new orangutan release site that they are about to set up in the project area. They would not have been this far along without having that available.</p>
<p>Todd Lemons InfiniteEARTH Ltd</p>	<p>General project specifics over the course of the site visit</p>
<p>Jim Procanik InfiniteEARTH Ltd</p>	<p>General project specifics over the course of the site visit</p>
<p>Billy World Education, Inc</p>	<p>General project specifics over the course of the site visit</p>
<p>Juliarta Bramansa Ottay Rimba Raya Project Staff</p>	<p>General project specifics over the course of the site visit</p>
<p>Carly Green Environmental Accounting Services</p>	<p>General project specifics over the course of the site visit and project review.</p>
<p>Supriono Abdul Wahab Atik Madi Novel Said Amrulah Efik Santoso + 3 Anonymous</p>	<p><u>Ulak Batu</u> community meeting to discuss the project, how it will affect the community, how it has changed their life and what they think of the project so far. Also discussed any changes they would like to see to the project and recommendations to the Project Proponents. See below for the full list of possible questions asked.</p>
<p>Yusrem Rasmani Suherman Juansyah Feri Yadi Basri Pa Husm Micky Arue Kahman Ruslam Arliam Matto Utum Ali Carly Green Stew, Arta Melita</p>	<p><u>Moura Dua</u> community meeting to discuss the project, how it will affect the community, how it has changed their life and what they think of the project so far. Also discussed any changes they would like to see to the project and recommendations to the Project Proponents. This was a group meeting where all individuals gathered in a public meeting space and were informed of the verification process, the current status of the project and then they were asked questions by verifiers. The discussions began with basic questions and verifiers allowed the discussion to flow relative to the subjects that seemed most important to the community members. The basic questions included:</p> <ul style="list-style-type: none"> <li>• <u>What do you know about the project?</u></li> <li>• <u>What is the goal of the project?</u></li> <li>• <u>What is your role in the project?</u></li> <li>• <u>Does the project have a future here?</u></li> </ul>

<p>Talip Arrani Rano Jupri Didi Rahman Jumeri Mallri Alamri Iyan Hamsan Yumansyah Billy Mhasti (sp) Jim Procanik Hartono M Yusuf Jasman Syahrudim Ambiki Yusri Suriasyah Misransyah Picih Suryadi Musmulyadi Karno + approx 15 anonymous who did not sign the attendance sheet.</p>	<ul style="list-style-type: none"> <li>• <u>What is the general thought on the project from the community?</u></li> <li>• <u>What consultation have you been part of?</u></li> <li>• <u>What would this project bring to you and your community?</u></li> <li>• <u>How would this project affect your lifestyle? Your children's lifestyle?</u></li> <li>• <u>Is there anyone that you know of who is not supportive of this project?</u></li> <li>• <u>How do you feel this project will improve your lives?</u></li> <li>• <u>How could this project have a negative impact on your lives?</u></li> <li>• <u>What benefits are you hoping for from this project for your family and/or community?</u></li> <li>• <u>What would make this project a success for you?</u></li> <li>• <u>What would make this project a failure for you?</u></li> <li>• <u>Have you heard of this project? How?</u></li> <li>• <u>Do you cut down the forest for agriculture?</u></li> <li>• <u>How many ha of land do you clear each year?</u></li> <li>• <u>Do you expect to receive any benefits from the project? What kind?</u></li> <li>• <u>Have you had any education as a result of this project?</u></li> <li>• <u>Has deforestation been reduced because of this project?</u></li> <li>• <u>Do you expect to be able to reduce your deforestation?</u></li> <li>• <u>Do you prepare land for agriculture use?</u></li> </ul>
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## 2.4 Site Inspections

The verification site inspection followed the prepared Verification and Sampling Plan process and was conducted on 13-20 October 2013. A 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 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 were performed throughout the site inspection in order to sufficiently satisfy the professional discretion of the Verification Team.

## 2.5 Resolution of Findings

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, 66 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.

**2.5.1 Forward Action Requests**

There were no forward action requests generated as a result of this review.

**2.6 Eligibility for Validation Activities**

Not Applicable to this verification.

### 3 VALIDATION FINDINGS

The project was previously validated and as such, no further validation activities were conducted during this verification.

#### 3.1 Participation under Other GHG Programs

The Rimba Raya Biodiversity Reserve Project also seeks verification for the Climate, Community and Biodiversity Project Design Standards (Second Edition). Participation in the Climate, Community and Biodiversity Standards does not affect the eligibility of the project to participate under the VCS program.

#### 3.2 Methodology Deviations

Not applicable to this verification. Refer to the previously provided validation report issued under separate cover by another VVB. No validation activities are reported here, and no deviations to the methodology were used.

#### 3.3 Project Description Deviations

The verifiers have confirmed that the project has deviated from the validated PD by not conducting the full extent of the validated monitoring plan during the period being verified. The project has not, however, deviated from any aspect of the methodology and meets all minimum monitoring requirements. The methodology applied, VM0004, allows for remote sensing to be solely used for quantification of disturbance elements in the Project Area. However, the validated Project Monitoring Plan had detailed plans to support the remote sensing monitoring with ground-based monitoring. The only deviations that occurred within the period being verified consisted of the absence of most of the ground-based monitoring activities. Section 2.2 of the Monitoring Report describes the specific elements that were and were not conducted.

An approximate 2-year delay in right of use permits from the Indonesian government resulted in deviations to the validated Monitoring Plan and Project Description for the second monitoring period. Despite the unanticipated delay in implementation of the project, the verification assessment team found that the VM0004 methodology elements remain applicable, and changes in the procedures for measurement and monitoring are appropriate and adequately described in the Monitoring Report. Because the Project completed the minimum monitoring requirements of VM0004, the applicability of the Methodology was not affected by the PD deviations. Additionality was also not affected, as the project still proves its activities are additional. Finally, the appropriateness of the baseline scenario remained intact, as the Project sufficiently completed the minimum monitoring requirements of the Methodology.

Additionality was not affected by the PD deviation because the previous validation had confirmed the baseline scenario, and it remains unchanged. The Monitoring Plan specified ground or reference data to be collected to support remote sensing monitoring for quantification of disturbance events. The planned ground data was not collected during the second monitoring period, but methodology element VM0004 allows for a strictly remote sensing approach to detect disturbance. Changes in procedures concerning remotely sensed disturbance detection confirm that descriptions of the changes induced by the deviation are sufficient. In many cases, the deviation to the monitoring plan was only in relation to temporal aspects of the periodicity of the monitoring activities, and several of the more important remote-sensing monitoring aspects were indeed conducted prior to the verification process.

According to the VCS Standard V3.4, Section 3.6, deviations from the project description are permitted at verification, and they must be appropriately described and justified in the Monitoring Report.

“Where the deviation does not impact the applicability of the methodology, additionality or the appropriateness of the baseline scenario, and the project remains in compliance with the applied methodology, the deviation shall be described and justified in the monitoring report. This shall include a description of when the changes occurred and the reasons for the changes.”

The verification assessment team concludes that the deviation does not impact the applicability of the methodology, additionality or the appropriateness of the baseline scenario. The deviation is appropriately described and justified in the Monitoring Report and remains in compliance with VCS rules.

### 3.4 Grouped Project

Not applicable to this verification. Refer to validation report issued under separate cover, which confirms this is not a Grouped Project.

## 4 VERIFICATION FINDINGS

### 4.1 Project Implementation Status

The project activities, as described in the validated PD and in the Monitoring Report, have been fully initiated. A two-year delay in obtaining rights-of-use from the Indonesian government prevented the project from validation and initial verification. There are no remaining issues from the validation. As this is the second verification, all activities have been implemented and confirmed by the verification team during the field sampling effort. Activities demonstrated were in accordance with Section 4 of the Monitoring Report.

The procedures outlined to estimate carbon stocks in specific pools within the project area and the uncertainty of the estimate have been implemented sufficiently. Allometric equations were used appropriately and sampling methods for peat bulk density and depth are sufficient. In accordance with the methodology (VM0004), carbon stocks for all strata have been estimated correctly.

### 4.2 Accuracy of GHG Emission Reduction and Removal Calculations

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 Standard, the validated PD and VM0004 v1.0. 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.

#### Data and parameters monitored\*

Data parameter	Verification team findings
N <sub>gapsP, it</sub>	This data/parameter was appropriately chosen because it pertains to number of logging gaps detected in stratum i, time t in the project area. This value was found to be surveyed sufficiently by field patrols in the baseline with intentions to perform annual monitoring using LIDAR detection methods. Although LIDAR was not available to the Project Proponent during the second monitoring period, the verification team confirmed that high-resolution aerial imagery (orthorectified LandsAT images) was used to observe for logging gaps, and observations during the site visit did not indicate any additional logging gaps had occurred. Field patrols are in place at

	project boundaries to detect logging gaps.
$L_{\log, tr, tk}$	This data/parameter was appropriately chosen because it pertains to length of log extracted from timber tree <i>tr</i> in stratum <i>i</i> , gap <i>k</i> , measured as the distance from stump to base of crown, less the length of any pieces of bole left on site. This value was found to be surveyed sufficiently by field patrols in accordance with OFI Standard Operating Procedures (SOPs) in the validated PD. As no new logging gaps were observed, the parameter was not applicable in verification.
$D_{\text{bottom}, tr, ik}$	This data/parameter was appropriately chosen because it pertains to diameter at the stump end of log extracted from timber tree <i>tr</i> in stratum <i>i</i> , gap <i>k</i> . This value was found to be surveyed sufficiently by field patrols in accordance with OFI Standard Operating Procedures (SOPs) in the validated PD. As no new logging gaps were observed, the parameter was not applicable in verification.
$D_{\text{top}, tr, ik}$	This data/parameter was appropriately chosen because it pertains to diameter at the crown end of log extracted from timber tree <i>tr</i> in stratum <i>i</i> , gap <i>k</i> . This value was found to be surveyed sufficiently by field patrols in accordance with OFI Standard Operating Procedures (SOPs) in the validated PD. As no new logging gaps were observed, the parameter was not applicable in verification.
$\phi_i$	This data/parameter was appropriately chosen because it pertains to wood density of extracted log in stratum <i>i</i> . This value was found to be selected accurately from a literature source, as approved in the validated PD.
CF	This data/parameter was appropriately chosen because it pertains to carbon fraction of dry matter (extracted log). This value was found to be selected accurately from an IPCC default value, as approved in the validated PD.
$D_{s, tr, ik}$	This data/parameter was appropriately chosen because it pertains to diameter of the stump of the logged timber tree <i>tr</i> in stratum <i>i</i> , gap <i>k</i> . This value was found to be surveyed sufficiently by field patrols in accordance with OFI Standard Operating Procedures (SOPs) in the validated PD. As no new logging gaps were observed, the parameter was not applicable in verification.
$H_{tr, ik}$	This data/parameter was appropriately chosen because it pertains to height of tree <i>tr</i> in stratum <i>i</i> , gap <i>k</i> . This value was found to be surveyed sufficiently by field patrols in accordance with OFI Standard Operating Procedures (SOPs) in the validated PD. As no new logging gaps were observed, the parameter was not applicable in verification.
$D_{\text{pce-b}, tr, ik}$	This data/parameter was appropriately chosen because it pertains to diameter of bottom end of piece left from timber tree <i>tr</i> in stratum <i>i</i> , gap <i>k</i> . This value was found to be surveyed sufficiently by field patrols in accordance with OFI Standard Operating Procedures (SOPs) in the validated PD. As no new logging gaps were

	observed, the parameter was not applicable in verification.
$L_{pce,tr,ik}$	This data/parameter was appropriately chosen because it pertains to length of piece left from timber tree $tr$ in stratum $i$ , gap $k$ . This value was found to be surveyed sufficiently by field patrols in accordance with OFI Standard Operating Procedures (SOPs) in the validated PD. As no new logging gaps were observed, the parameter was not applicable in verification.
$D_{pce-t,tr,ik}$	This data/parameter was appropriately chosen because it pertains to diameter of top end of piece $pce$ left from timber tree $tr$ in stratum $i$ , gap $k$ : cm. This value was found to be surveyed sufficiently by field patrols in accordance with OFI Standard Operating Procedures (SOPs) in the validated PD. As no new logging gaps were observed, the parameter was not applicable in verification.
$D_{logging\ drain,it}$	This data/parameter was appropriately chosen because it pertains to average depth of peat drainage or average depth to water table in drained area of stratum $i$ , time $t$ during the dry season. This value was found to be field measured accurately during the site visit and is continues to be surveyed sufficiently by field patrols in accordance with OFI Standard Operating Procedures (SOPs) in the validated PD. As no new logging gaps were observed, the parameter was not applicable in verification.
$A_{logging\ peatimpact,it}$	This data/parameter was appropriately chosen because it pertains to area of drainage impact in stratum $i$ , time $t$ . This value was found to be selected after consulting with a peat expert who provided a buffer applied in GIS.
CE	This data/parameter was appropriately chosen because it pertains to average biomass combustion efficiency. This value was found to be selected accurately from an IPCC default value, as approved in the validated PD.
$MC_{burnedP,AG,it}$	This data/parameter was appropriately chosen because it pertains to estimated aboveground carbon stock after burning under the project case for stratum $i$ , time $t$ . This value was found to be conservatively estimated, by assuming a complete loss of aboveground biomass and no regeneration. It was properly derived from annual remote sensing analysis for landcover change and fire hotspots. Methods used to derive fire size and location were in compliance according to the GOFC-GOLD sourcebook and best available methods for the region.
N/C ratio	This data/parameter was appropriately chosen because it pertains to the nitrogen-carbon ratio. This value was found to be selected accurately from an IPCC default value, as approved in the validated PD.
$ER_{N20}$	This data/parameter was appropriately chosen because it pertains to the emission ratio for $N_2O$ . This value was found to be selected accurately from an IPCC default value, as approved in the validated PD.

$ER_{CH_4}$	This data/parameter was appropriately chosen because it pertains to the emission ratio for $CH_4$ . This value was found to be selected accurately from an IPCC default value, as approved in the validated PD.
$GWP_{N_2O}$	This data/parameter was appropriately chosen because it pertains to global Warming Potential for $N_2O$ . This value was found to be selected accurately from a VM0004 Methodology specific value.
$GWP_{CH_4}$	This data/parameter was appropriately chosen because it pertains to global Warming Potential for $CH_4$ . This value was found to be selected accurately from a VM0004 Methodology specific value.
$A_{p, burn, it}$	This data/parameter was appropriately chosen because it pertains to area burned in stratum $i$ , time $t$ in the project area. This value was found to be properly derived from annual remote sensing analysis for fire hotspots and adequate ground truthing due to lack of high resolution imagery. Methods used to derive fire size and location were in compliance according to the GOFC-GOLD sourcebook and best available methods for the region.
$D_{P, burn, it}$	This data/parameter was appropriately chosen because it pertains to depth of peat burned under the project scenario in stratum $i$ at time $t$ . This value was found to be properly estimated from field measurements and relevant peer-reviewed literature. Furthermore, the value specified in the VM0004 Methodology is the upper-end conservative estimate of 55cm.
$BD_i$	This data/parameter was appropriately chosen because it pertains to bulk density of peat in stratum $i$ . This value was found to be properly selected from expert advice and field work conducted in the project area.
$EF_{CO_2}$	This data/parameter was appropriately chosen because it pertains to $CO_2$ emissions from the combustion of peat. This value was found to be selected accurately from the literature and further taken from the VM0004 Methodology.
$EF_{CH_4}$	This data/parameter was appropriately chosen because it pertains to $CH_4$ emission from the combustion of peat. This value was found to be selected accurately from the literature and further taken from the VM0004 Methodology.
$A_{P, LCC, it}$	This data/parameter was appropriately chosen because it pertains to area that underwent land cover change in stratum $i$ , monitoring year $t$ . This value was found to be properly derived from annual remote sensing analysis utilizing orthorectified imagery.
$A^{LCCn}_{peatimpact, it}$	This data/parameter was appropriately chosen because it pertains to area of drainage impact due to land cover change in stratum $i$ , monitoring year $t$ . This value was found to be properly derived from annual remote sensing analysis and calculated accurately using the buffer tool in GIS. The selected buffer distance was chosen based on expert opinion.

<p>D LCC drain,it</p>	<p>This data/parameter was appropriately chosen because it was based on the maximum depth of peat drainage or depth to water table (as determined by field measurements) in the deforested area under the project scenario in stratum i, time t. This value was found to be properly derived from field measurements in accordance with validated SOPs or estimated from literature values if measurements were not available.</p>
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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. The Verifier confirmed no confidence deduction was required, as uncertainty was less than 10% in each monitoring year.

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.

#### 4.3 Quality of Evidence to Determine GHG Emission Reductions and Removals

The verification team confirms that there is sufficient evidence provided by the Project Proponent to determine the 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.

The evidence provided to determine emission reductions reported in the monitoring report included values, notations, units and sources. The major carbon pool for this site is the peat soil pool, and measurements taken demonstrate that the peat depth in the project region met the 1m depth allowable by the methodology. This evidence has been cross-checked with supplied emission reduction calculation spreadsheets and a comprehensive GIS dataset. The procedure for data recording, transfer and final transposition was also verified and found to be in compliance with the monitoring plan of the PD. The verification team was able to confirm through cross-checks that adequate monitoring mechanisms are in place where the required parameters need to be monitored. 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.

#### 4.4 Non-Permanence Risk Analysis

AFOLU Non-Permanence Risk Tool (04 October 2012, v3.2) was used by the Project Proponent to assess overall project risk. The verification team reviewed the Non-Permanence Risk Report provided with the verification supporting documentation and confirmed that the project adheres to the requirements set out in the Non-Permanence Risk Tool. The assessment of each factor is found in the table below. The final score was calculated to be 15%.

Factor	Rationale & Quality	Conclusion
<u>Internal Risks</u>		
Project Management	This is the second verification of the Rimba Raya Biodiversity Reserve Project and does not contain stocks on which previous credits have been issued. The management team includes members who have established management experience at the executive, managerial, and operational field levels. This is evident by the successful validation of the project. The team does not include any individuals who have successfully managed a project through verification and issuance of GHG credits. The ongoing extent of the carbon stocks in the project area require protection from 2 outside actors: Identified agent of deforestation (PT Best) and accidental/intentional burning within project boundary	A risk rating of <b>2</b> is appropriate given the rationale provided describing the management team and risk of encroachment that was observed during the monitoring period. The project team includes individuals with significant experience in AFOLU project design, implementation, accounting and reporting.
Financial Viability	Project has secured funding adequate to fund the operational budget for the life of the project. Documentation has been provided to prove sound financial viability. The project cash flow was positive at the start of the second verification. InfiniteEARTH has executed forward sales triggered upon the first verification that created an endowment which sufficiently funds the operational budget through an annuity for the entire life of the project.	A risk rating of <b>0</b> is appropriate given the rationale and documented evidence provided.
Opportunity Cost	The opportunity cost of land use change was found to be relatively high when considered in the amount of financial gain per ton of CO2 equivalent emitted from a land use change (i.e. palm oil plantation conversion). The project is taking the highest score possible for this aspect since the conversion to Palm Oil is deemed to be much more profitable than the current project.	A risk rating of <b>8</b> is appropriate given the highest possible opportunity cost rating used for the project due to the NPV analysis provided.
Project Longevity	Documentation for a legal contract to maintain project activities as forest for at least 60 years as forest has	A risk rating of <b>0</b> is appropriate given the rationale that the project

	been provided.	longevity is 60 years.
<b>Total Internal Risks</b>		<b>8</b>
<b>External Risks</b>		
Land Tenure and Resource Access Impacts	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.	A risk rating of <b>2</b> is appropriate given that the resource access/use rights and ownership are held by different entities.
Community Engagement	There are no communities living on the property and >20% within 20km of project boundaries have been consulted about the project.	A risk rating of <b>-5</b> is appropriate given the rationale provided. The project has consulted with more than 20% of the households living within 20Km of the project area, and the project generates net positive impacts on the social and economic well-being of the local communities.
Political Risk	A governance score was calculated based on the World Bank Institute's Worldwide Governance Indicators for Indonesia and the average score was determined to be -.46. Indonesia is receiving REDD+ readiness funding (grant signed June 2011)	A risk rating of <b>2</b> is appropriate given the deduction for governance and applicability for the mitigation credit.
<b>Total External Risks</b>		<b>0</b>
<b>Natural Risks</b>		
Fire, pests and disease, extreme weather, geologic risk,	The difficulty of data availability makes it challenging to quantify the likelihood of natural risks, but historical average and return interval can be used. The greatest natural risk is fire, and causes are usually anthropogenic and isolated incidents. For Fire, the project claimed a relatively high likelihood score with a relatively low to medium significance score as the small fires tend to be contained and the area surrounding the project area is almost all in palm oil plantations, excepting the National Park to the West, where fire control is a very high priority and natural caused fires are nearly non-existent. Pest and	A risk rating of <b>7</b> is appropriate given the rationale provided for the greatest natural risk of fire and extreme weather.

	<p>disease ratings were deemed to be acceptable by verifiers and independent research by verifiers could not locate any information to suggest an alternative opinion.</p> <p>The Project Area is in an area considered to be an area of low risk of geological activity (Table 1). The US Geological Survey (Peterson et. al., 2007) states, “The published literature and maps of Indonesian Kalimantan contain no information on Quaternary faults and folds, even on a regional scale. A few significant historical earthquakes have occurred east of long. 115° E., but there has been no significant seismicity west of long. 115°E. We have no geologic or geomorphic information that can contribute to a seismic hazard map for this area.” The region of the Project Area is at low geological Risk</p> <p>Verifiers reviewed the websites listed and literature sources and could not locate any reason why geologic risks would be considered any more likely than that reflected by the score given to this indicator.</p> <p>Verifiers conducted an internet search and could not identify any other natural risks to the project area.</p>	
<p><u>Total Natural Risks</u></p>		<p><b>7</b></p>
<p><u>Total Risk Score</u></p>		<p><b>15</b></p>

Additionally, due to the fires that occurred during the second monitoring event (2011/2012 monitoring year), the Project sought guidance as to whether their sum total emissions constituted a loss event. The project submitted an official loss report to VCS on 06 November 2013.

Through on-site observations and GIS analysis, the verifier confirmed the area of fire damage to be as stated in the loss event report and at the specified time period (occurred during the dry season from August to November of 2011), as was viewed by the available LandsAT imagery for the monitoring period.

The loss event resulted in a total emissions reduction loss of 278,886 t CO<sub>2</sub>e. Verifiers confirm that the total loss of 278,886 t CO<sub>2</sub>e was the correct amount of emissions reduction lost during the reported time frame. The verifier confirmed that the project submitted their Loss Event Report within the required two-year window from the time of the loss. The verifier confirmed this loss did not result in a reversal, as per the VCS definitions.

## 5 VERIFICATION CONCLUSION

After review of all project information, procedures, calculations, supporting documentation and the site visit, ESI confirms that the monitoring conducted by the Project Proponent, along with the supporting Monitoring Report, are accurate and consistent with all aforementioned VCS criteria, the validated PD, and the selected methodology (VM0004, v1.0). ESI confirms that the *Rimba Raya Biodiversity Reserve Project*, Monitoring Report (Version 1.0 Final, dated 06 December 2013) 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), as documented in this report are complete.

ESI has confirmed the Project Proponent (InfiniteEARTH Ltd) has the right to any and all reductions generated by the project during the period 01 July 2010 – 30 June 2013. ESI concludes without any qualifications or limiting conditions that the *Rimba Raya Biodiversity Reserve Project* (MR, dated 06 December 2013), meets the requirements of VCS Version 3 and all associated updates for the second monitoring period.

The GHG assertion provided by InfiniteEARTH and verified by ESI has resulted in the GHG emissions reduction or removal of 8,500,628 tCO<sub>2</sub> equivalents by the project during the verification period/reporting period (01 July 2010 to 30 June 2013). This value is net of Project emissions, leakage emissions and a withholding buffer (1,526,179 tCO<sub>2</sub> equivalents) based on the non-permanence risk assessment tool.

Verification period: From 01-07-2010 to 30-06-2013

Verified GHG emission reductions and removals in the above verification period:

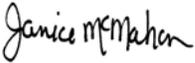
Year	Baseline emissions or removals (tCO <sub>2</sub> e)	Project emissions or removals (tCO <sub>2</sub> e)	Market Leakage emissions (tCO <sub>2</sub> e)	Non-Permanence Risk Buffer (tCO <sub>2</sub> e)	Net GHG emission reductions or removals (Net VCU Allocation) (tCO <sub>2</sub> e)
2010-2011	4,852,575	-767,425	-1,198,394	433,014	2,429,122

2011-2012	5,613,677	-312,427	-2,021,067	492,028	2,738,916
2012-2013	5,609,057	-117,382	-1,484,087	601,138	3,332,590
<b>Total</b>	<b>16,075,309</b>	<b>-1,197,233</b>	<b>-4,703,548</b>	<b>1,526,180</b>	<b>8,500,628</b>

**Voluntary Carbon Unit (VCU) Vintages for Monitoring Period 1 July 2010 – 30 June 2013**

<b>Year</b>	<b>Net VCU allocation</b>	<b>Buffer Allocation</b>
2010 (Jul-Dec)	1,214,561	216,507
2011 (Jan-Dec)	2,584,019	462,521
2012 (Jan-Dec)	3,035,753	546,583
2013 (Jan-Jun)	1,666,295	300,569
<b>Total</b>	<b>8,500,628</b>	<b>1,526,180</b>

**Submittal Information**

Report Submitted to:	<p>Verified Carbon Standard Association 1730 Rhode Island Ave. NW, Suite 803, Washington, D.C. 20036</p> <p>InfiniteEARTH Ltd. Suite-8/A, The Ritz Plaza, 122 Austin Road, Tsim Sha Tsui Kowloon, Hong Kong</p>
Report Submitted by:	<p>Environmental Services, Inc. - Corporate Office 7220 Financial Way, Suite 100 Jacksonville, Florida 32256</p>
ESI Lead Verifier Name and Signature	 Caitlin Sellers Lead Verifier
ESI Division Regional Technical Manager Name and Signature	 Janice McMahon Vice President and Forestry, Carbon and GHG Division Regional Technical Manager
Date:	10 December 2013

APPENDIX A – DOCUMENTS RECEIVED/REVIEWED

Documents from client 18 September 2013

- o LandSATMosaic
  - 2010
    - LT51190622010016BKT00\_stack\_atm\_subset\_masked.tif
    - LT51190622010016BKT00\_stack\_atm.tfw
    - LT51190622010016BKT00\_stack\_atm.tif
    - LT51190622010016BKT00\_stack\_atm.tif.aux.xml
    - LT51190622010016BKT00\_stack\_atm.tif.ovr
    - LT51190622010016BKT00\_stack\_atm\_subset\_masked.aux
    - LT51190622010016BKT00\_stack\_atm\_subset\_masked.rrd
  - 2012
    - LE71190622011315EDC00\_20111111\_stack\_atm.tfw
    - LE71190622011315EDC00\_20111111\_stack\_atm.tif
    - LE71190622012126EDC00\_20120505\_stack\_atm.aux
    - LE71190622012126EDC00\_20120505\_stack\_atm.tfw
    - LE71190622012126EDC00\_20120505\_stack\_atm.tif
    - LE71190622012158EDC00\_20120606\_stack\_atm.aux
    - LE71190622012158EDC00\_20120606\_stack\_atm.tfw
    - LE71190622012158EDC00\_20120606\_stack\_atm.tif
    - LE71190622012254EDC00\_20120910\_stack\_atm.aux
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    - LE71190622012254EDC00\_20120910\_stack\_atm.tif
    - LE71190622012286EDC00\_20121012\_stack\_atm.aux
    - LE71190622012286EDC00\_20121012\_stack\_atm.tfw
    - LE71190622012286EDC00\_20121012\_stack\_atm.tif
    - RimbaRaya\_2012\_Mosaic\_final.tfw
    - RimbaRaya\_2012\_Mosaic\_final.tif

- RimbaRaya\_2012\_Mosaic\_final.tif.aux.xml
- RimbaRaya\_2012\_Mosaic\_final.tif.ovr
- 2013
  - 20130625\_stack\_atm.tif
  - LC81190622013120LGN01\_20130430\_stack\_atm.tfw
  - LC81190622013120LGN01\_20130430\_stack\_atm.tif
  - LC81190622013152LGN00\_20130601\_stack\_atm.tfw
  - LC81190622013152LGN00\_20130601\_stack\_atm.tif
  - LC81190622013184LGN00\_20130703\_stack\_atm.tfw
  - LC81190622013184LGN00\_20130703\_stack\_atm.tif
  - LE71190622013176EDC00\_20130625\_stack\_atm.tfw
  - LE71190622013176EDC00\_20130625\_stack\_atm.tif
  - LE71190622013224EDC00\_20130812\_stack\_atm.tfw
  - LE71190622013224EDC00\_20130812\_stack\_atm.tif
  - RimbaRaya\_2013\_Mosaic\_Final\_TIFF.tfw
  - RimbaRaya\_2013\_Mosaic\_Final\_TIFF.tif
  - RimbaRaya\_2013\_Mosaic\_Final\_TIFF.tif.aux.xml
  - RimbaRaya\_2013\_Mosaic\_Final\_TIFF.tif.ovr

Documents from client 19 September 2013

- o ValidationFileChecklist.docx
- o Calculator
  - Rimba Raya\_M22010\_2013.xlsx
- o Fire
  - MODISHotSpots
    - RandomMODISData.shx
    - Modis\_hotspots\_2010\_2012.dbf
    - Modis\_hotspots\_2010\_2012.prj
    - Modis\_hotspots\_2010\_2012.sbn
    - Modis\_hotspots\_2010\_2012.sbx
    - Modis\_hotspots\_2010\_2012.shp
    - Modis\_hotspots\_2010\_2012.shp.xml

- Modis\_hotspots\_2010\_2012.shx
- Modis\_hotspots\_2013.dbf
- Modis\_hotspots\_2013.prj
- Modis\_hotspots\_2013.sbn
- Modis\_hotspots\_2013.sbx
- Modis\_hotspots\_2013.shp
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- Modis\_hotspots\_2013.shx
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- RandomMODISData.prj
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- RandomMODISData.sbx
- RandomMODISData.shp
- RandomMODISData.shp.xml
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  - burned2011\_projectarea.prj
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  - burned2011\_projectarea.sbx
  - burned2011\_projectarea.shp
  - burned2011\_projectarea.shp.xml
  - |
  - burned2011\_projectarea.shx
  - burned2012\_projectarea.dbf
  - burned2012\_projectarea.prj
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  - burned2013\_projectarea.prj
  - burned2013\_projectarea.sbn
  - burned2013\_projectarea.sbx
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  - burned2013\_projectarea.shp.xml
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    - Deforestation\_EffectedCCAArea.prj
    - Deforestation\_EffectedCCAArea.sbn
    - Deforestation\_EffectedCCAArea.sbx
    - Deforestation\_EffectedCCAArea.shp
  - Deforestation\_EffectedCCAArea.shp.xml
  - Deforestation\_EffectedCCAArea.shx
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  - NorthernBoundary2kmBuffer.prj
  - NorthernBoundary2kmBuffer.sbn
  - NorthernBoundary2kmBuffer.sbx
  - NorthernBoundary2kmBuffer.shp
  - NorthernBoundary2kmBuffer.shp.xml
  - NorthernBoundary2kmBuffer.shx
  - NorthernBoundaryCanalExtent.dbf
  - NorthernBoundaryCanalExtent.prj
  - NorthernBoundaryCanalExtent.sbn
  - NorthernBoundaryCanalExtent.sbx
  - NorthernBoundaryCanalExtent.shp
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    - MarcelSilvius\_Opinion.docx
    - AswinUsup.docx
    - Biography Silvius 2013.doc
  - Leakage
    - Concessions
      - palmoil\_notdefinitive\_notoperational.shx
      - operatingoilpalm\_definitive.dbf
      - operatingoilpalm\_definitive.prj
      - operatingoilpalm\_definitive.sbn
      - operatingoilpalm\_definitive.sbx
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    - LoggingGap2.shx
    - LoggingGap\_1\_Buffer\_LULC.dbf
    - LoggingGap\_1\_Buffer\_LULC.prj
    - LoggingGap\_1\_Buffer\_LULC.sbn
    - LoggingGap\_1\_Buffer\_LULC.sbx
    - LoggingGap\_1\_Buffer\_LULC.shp
    - LoggingGap\_1\_Buffer\_LULC.shp.xml
    - LoggingGap\_1\_Buffer\_LULC.shx
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    - LoggingGap\_3.sbx
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    - LoggingGap\_3.shx
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    - LoggingGap\_3\_Buffer\_LULC.prj
  - LoggingGap\_3\_Buffer\_LULC.sbn
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  - LoggingGap\_3\_Buffer\_LULC.shp
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  - LoggingGap\_3\_Buffer\_LULC.shx
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  - LoggingGap1.sbn
  - LoggingGap1.sbx
  - LoggingGap1.shp
  - LoggingGap1.shx
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      - classification\_2010\_final\_project\_area.prj
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      - classification\_2010\_final.dbf
      - classification\_2010\_final.lyr
      - classification\_2010\_final.prj
      - classification\_2010\_final.sbn
      - classification\_2010\_final.sbx
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      - classification\_2010\_final.shp.xml
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        - classification\_2012\_final\_project\_area.prj
        - classification\_2012\_final\_project\_area.shp
        - classification\_2012\_final\_project\_area.shp.xml
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- classification\_2012\_final.s  
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- classification\_2012\_final.d  
bf
- classification\_2012\_final.ly  
r
- classification\_2012\_final.pr  
j
- classification\_2012\_final.s  
bn
- classification\_2012\_final.s  
bx
- classification\_2012\_final.s  
hp
- classification\_2012\_final.s  
hp.xml
- 2013
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    - classification\_2013\_final\_p  
roject\_area.dbf
    - classification\_2013\_final\_p  
roject\_area.prj
    - classification\_2013\_final\_p  
roject\_area.sbn
    - classification\_2013\_final\_p  
roject\_area.sbx
    - classification\_2013\_final\_p  
roject\_area.shp
    - classification\_2013\_final\_p  
roject\_area.shp.xml
  - BufferZone
- M2MonitoringReport
  - InfiniteEarth\_MonitoringReportM2.  
docx
  - Annex1\_Implementation Schedule  
for Major Project Activities.docx
- ProjectBoundaries
  - RimbaRayaConcession.shx
  - CarbonAccountingArea.dbf
  - CarbonAccountingArea.prj
  - CarbonAccountingArea.sbn
  - CarbonAccountingArea.sbx
  - CarbonAccountingArea.sh"
  - CarbonAccountingArea.shp.xml
  - CarbonAccountingArea.shx
  - RimbaRayaConcession.dbf
  - RimbaRayaConcession.prj
  - RimbaRayaConcession.sbn
  - RimbaRayaConcession.sbx
  - RimbaRayaConcession.shp
- References
  - Ballhorn\_2009\_Derivation\_burn\_sc  
ar\_depth\_LIDAR\_Indonesian\_peatl  
ands.pdf
- Risk
  - VCS Non-Permanence Risk Report  
Template Short,  
v3.0\_RimbaRayaM2.doc
  - Supporting Evidence
    - ProjectLongevity
      - Decree and Working area  
Map – signed
        - Working Area Map.pdf
        - SK146 Decree -  
Indo.pdf
        - SK146 Decree-  
English.pdf
        - SK146 Map 36,000  
decree- Signed.pdf
      - Agreement with National  
Park
        - PNP-RRC  
Map\_18642ha.jpg
        - TNTP -PT RRC 010713  
(eng)(translation.pdf
      - Agreement with PT Best
        - TNTP-RRC Agreement  
Indo (010713).pdf
        - PT Best Agreement -  
English 2012.pdf
        - PT Best Agreement-  
Indo.pdf
        - PT  
BEST\_Letter\_Final\_Jul  
y 2012.pdf
      - FinancialViability
    - Breakeven.xlsx
    - NaturalRisk
    - Nair2000.pdf
    - FAO2007.pdf
    - OpportunityCost
      - Heli et al (2009)  
Land Use Policy  
REDD+.pdf
      - InfiniteEarth\_VCS Risk  
Report Calculation Tool,  
v3.0\_M2.xls
  - Validated\_VerifiedDocuments
    - PROJ\_DESC\_674\_15MAY2011(1).  
pdf
    - MONIT\_REP\_674\_01JUL2009\_30J  
UN2010-2.pdf

Documents from client 20 September 2013

- Leakage
  - LT51190622010016BKT00\_stack\_a  
tm.tif.ovr
  - LC81190622013152LGN00\_stack\_  
atm.tfw

- LC81190622013152LGN00\_stack\_atm.tif
- LC81190622013152LGN00\_stack2\_atm.log
- LE71190622011027EDC00\_stack.tfw
- LE71190622011027EDC00\_stack.tif
- LE71190622011171EDC00\_stack.aux
- LE71190622011171EDC00\_stack.rrd
- LE71190622011171EDC00\_stack.tfw
- LE71190622011171EDC00\_stack.tif
- LE71190622012286EDC00\_stack\_atm.aux
- LE71190622012286EDC00\_stack\_atm.tfw
- LE71190622012286EDC00\_stack\_atm.tif
- LE71190622013224EDC00\_stack\_atm.log
- LE71190622013224EDC00\_stack\_atm.tfw
- LE71190622013224EDC00\_stack\_atm.tif
- LT51190622010016BKT00\_stack\_atm.tif
- LT51190622010016BKT00\_stack\_atm.tif.aux.xml

Documents from VCS Database 1 October 2013

- VERIF\_REP\_674\_01JUL2009\_30JUN2010.pdf
- VALID\_REP\_674\_31AUG2011.pdf

Documents from client 3 October 2013

- Monitoring Plan\_2009.05.15\_Updated\_2011.04.12\_Final.pdf

Documents from client 4 October 2013

- LAP-surveylog-juli2013-english.pdf
- LAP-survey Hotspot-2013-english.pdf

Documents from client 8 October 2013

- Audit Field Plan.jpg
- Validation\_Audit\_Plan\_2013-3.doc

Documents from client 18 October 2013

- June 27th Payment 3.9mEUR.pdf
- RR Cash Flow and Breakeven 2013 through June 30, 2015-2.pdf
- Signed VCU Single Trade Agreement (2).pdf

Documents from client 20 October 2013

- Annex 3\_Fire Plan and Training.zip
- DataStorage\_QAQC.docx
- Project Description Deviations.docx
- QA & QC Plan\_v 1.2.pdf

Documents from client 22 October 2013

- Project Description Deviations.docx
- QA & QC Plan\_v 1.2.pdf
- SOP Field Patrols.PDF

Documents from client 27 October 2013

- DepartmentEnvironment\_LeakageMeeting\_22102013.doc
- LeakageDueDiligence.docx
- TotalPTBESTLeakage.dbf
- TotalPTBESTLeakage.prj
- TotalPTBESTLeakage.sbn
- TotalPTBESTLeakage.sbx
- TotalPTBESTLeakage.shp
- TotalPTBESTLeakage.shp.xml
- TotalPTBESTLeakage.shx

Documents from client 08 November 2013

- WRCVCSemail\_2112013.pdf
- Enghart\_CV.pdf
- InfiniteEarth\_VCS Risk Report Calculation Tool, v3.0\_M2.xls
- Navratil\_CV.pdf
- OC NVP Book\_120916.xlsx-1.xlsx
- VCS Non-Permanence Risk Report Template Short, v3.0\_RimbaRayaM2.doc
- VCSEMail\_V3.3Template.pdf

Documents from client 12 November 2013

- CL4
  - WRCVCSemail\_2112013.pdf
- LossEvent Report
  - VCS Loss Event Report\_674\_31102013.pdf
  - Loss Representaion 2013\_0001\_signed.pdf
- MonitoringReport\_Calculator
  - Rimba Raya\_M22010\_2013V2.xlsx
  - InfiniteEarth\_MonitoringReportM2-revisions.docx
- NCR5
  - VCS Loss Event Documents-shape files
  - VCS\_LossEvent\_31102013.pdf
  - Loss Representaion 2013\_0001\_signed.pdf
  - VCS Loss Event Report\_674\_31102013.pdf

- VCS Loss Event Report31102013.doc
- VCS Loss Event Representation, v3.1-1.doc
- NCR26
  - High resolution imagery was not able to be accessed during the Monitoring period.docx
  - Degradation.docx
- NCR54
  - Navratil\_CV.pdf
  - Englhart\_CV.pdf
- OFI2
  - VCSEMail\_V3.3Template.pdf
- Risk Assessment
  - VCS Non-Permanence Risk Report Template Short, v3.0\_RimbaRayaM2.doc
  - InfiniteEarth\_VCS Risk Report Calculation Tool, v3.0\_M2.xls
  - OC NVP Book\_120916.xlsx-1.xlsx
- Copy of Copy\_of\_048-Rimba\_Raya\_VCS\_v3VM0004\_Verification\_Round\_1\_NCRs-CLs-OFIs\_v2.xlsx
- Copy of Copy\_of\_048-Rimba\_Raya\_VCS\_v3VM0004\_Verification\_Round\_1\_NCRs-CLs-OFIs\_v2(1).xlsx
- InfiniteEarth\_VCS Risk Report Calculation Tool, v3.0\_M2.xls
- OC NVP Book\_120916.xlsx-1.xlsx
- VCS Non-Permanence Risk Report Template Short, v3.0\_RimbaRayaM2.doc

Documents from client 13 November 2013

- VCS Non-Permanence Risk Report Template Short, v3.0\_RimbaRayaM2.doc
- InfiniteEarth\_MonitoringReportM2-revisions.docx
- InfiniteEarth\_VCS Risk Report Calculation Tool, v3.0\_M2.xls
- OC NVP Book\_120916.xlsx-1.xlsx
- Rimba Raya\_M22010\_2013V2.xlsx
- VCS Loss Event Report31102013.pdf

Documents from client 18 November 2013

- VCS Non-Permanence Risk Report Template Short, v3.0\_RimbaRayaM2.doc
- InfiniteEarth\_VCS Risk Report Calculation Tool, v3.0\_M2.xls
- Rimba Raya\_M22010\_2013V2.xlsx

Documents from client 20 November 2013

- 5
  - Rimba Raya Baseline Report\_2010.04.16\_Final.pdf
  - Canaldepthwidth.xlsx
  - Data Bulk Density.xls
- 30\_31
  - Annex4-surveycanaldepth-2013-english.pdf
- 58
  - Validation\_2013.rar
- Rimba Raya\_M22010\_2013V3.xlsx
- Round2Items\_19112013.docx

Documents from client 21 November 2013

- Rimba Raya\_M22010\_2013V3.xlsx
- Copy of Copy\_of\_048-2013-11-20\_Rimba\_Raya\_VCS\_VM0004\_Verification\_Round\_2\_NCRs-CLs-OFIs\_v1\_cg.xlsx
- InfiniteEarth\_MonitoringReportM2-V3.docx

Documents from client 03 December 2013

- InfiniteEarth\_MonitoringReportM2-V4.docx
- VCS Clarification, #674, Loss Event, 12 NOV 2013.pdf

Documents from client 04 December 2013

- InfiniteEarth\_MonitoringReportM2-V4.docx
- Rimba Raya\_M22010\_2013V3.xlsx
- CAAburntArea2013
  - Burnt2013\_CCA\_LULC.shx
  - Burnt2013\_CCA\_LULC.dbf
  - Burnt2013\_CCA\_LULC.prj
  - Burnt2013\_CCA\_LULC.sbn
  - Burnt2013\_CCA\_LULC.sbx
  - Burnt2013\_CCA\_LULC.shp
  - Burnt2013\_CCA\_LULC.shp.xml

Documents from client 05 December 2013

- InfiniteEarth\_MonitoringReportM2-V4.docx
- VCS Non-Permanence Risk Report Template Short, v3.0\_RimbaRayaM2.doc

Documents from client 06 December 2013

- InfiniteEarth\_MonitoringReportM2-V5.docx
- InfiniteEarth\_MonitoringReportM2-Final.docx

- 048-Rimba Raya VCS Verification Report-final\_draft\_cg.pdf
- InfiniteEarth\_MonitoringReportM2-FinalVersion.PDF

**APPENDIX B – NCRS/CL/OFIS**

Item Number	1
<p><b>VCS Standard VCS Version 3 Requirements Document 08 October 2013, v3.4</b></p>	<p>2) Where the deviation does not impact the applicability of the methodology, additionality or the appropriateness of the baseline scenario, and the project remains in compliance with the applied methodology, the deviation shall be described and justified in the monitoring report. This shall include a description of when the changes occurred and the reasons for the changes. The deviation shall also be described in all subsequent monitoring reports. Examples of such deviations include changes in the procedures for measurement and monitoring, or project design changes that do not have an impact on the applicability of the methodology, additionality or the appropriateness of the baseline scenario.</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	<p>M2 Monitoring Report</p>
<p><b>Findings</b></p>	<p>The project has not deviated from any part of the methodology. The project has suffered an approximate 2 year delay in the establishment of the signed right of use documentation from the Indonesian Government and as such has not been able to enact the full monitoring procedures that were planned in the validated monitoring plan and project description. This is not deemed to be a major issue since the methodology applied, VM0004, allows for only remote sensing to be used for quantification of the disturbance elements. This is deemed to be a monitoring deviation only in that the project has plans to conduct ground based monitoring as well. The project has not been able to start this process in full due to the lack of funding and lack of full user rights. The user rights were finally granted and are retroactive to the start of the project, which is before the start of the M2 monitoring period. As such, this element is considered to be acceptable by verifiers and in alignment with the methodology and the VCS Standard.</p>
<p><b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b></p>	<p>CL: Please fully describe the monitoring deviations as required by the VCS Standard v3.4. Please describe these deviations in the Monitoring Report as required.</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Round 1 Response from Project Proponent October 2013</b></p>	<p>Section 2.2 of the monitoring plan has been expanded to more clearly describe the when and why aspects of the deviations to the projects approved monitoring plan. This also includes additional clarification presented in the Monitoring Component Tables 4 and 5 in the monitoring report. The updated text in the monitoring report is attached to this email.</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Final Round 1 NCR/CL/OFI 29 October 2013</b></p>	<p>Pending review of final MR.</p>
<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>Section 2.2 of the monitoring plan has been expanded to more clearly describe the when and why aspects of the deviations to the projects approved monitoring plan. This also includes additional clarification presented in the Monitoring Component Tables 4 and 5 in the monitoring report. The updated text in the monitoring report is attached to this email.</p>

<b>Findings</b>	The monitoring report has updated language regarding the deviations made to the ground monitoring aspects of the project monitoring plan. Verifiers agree that these deviations do not affect the compliance with the methodology. Issue is addressed.
<b>Final Round 2 NCR/CL/OFI 20 November 2013</b>	CL: Please remove the redundant words "do not have an impact on the" from the last sentence of the first paragraph of Section 2.2.  OFI: Please justify the text of Section 2.2.1 for consistency.  Pending final review of MR.
<b>Final Round 2 Response from Project Proponent November 2013</b>	The redundant text has been deleted from Section 2.2. Formatting to justify text in Section 2.2.1 completed.
<b>Findings</b>	The redundant text has been completed. Additions added to Section 2.2.1 further explain the deviations to the monitoring plan, which are in accordance with the VCS rules. Addressed.

<b>Item Number</b>	<b>2</b>
<b>VCS Standard VCS Version 3 Requirements Document 08 October 2013, v3.4</b>	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.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	validated PD and M2 Monitoring Report.
<b>Findings</b>	They are not using the updated templates.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	OFI: VCS issued new templates on 08 October 2013. Although there is a grace period, the VVB recommends the Project convert to the updated templates to ensure the project is establishing its maximum efficacy and readership.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	The Project acknowledges that the VCS issued a new template on the 8th October, however given we are well advanced into the verification we will be taking advantage of the grace period as is allowed by the standard. The Project has received confirmation from VCS that the grace period is until 8 April 2013. This email is attached to this response.
<b>Findings</b>	There is no reason why the project cannot simply adhere to the updated templates following the close of the grace period. Addressed.

Item Number	3
<b>VCS Standard VCS Version 3 Requirements Document 08 October 2013, v3.4</b>	3.17.1 The project proponent shall ensure that all documents and records are kept in a secure and retrievable manner for at least two years after the end of the project crediting period.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	validated PD and M2 Monitoring Report.
<b>Findings</b>	A search of both the validated PD and current M2 Monitoring Report for both VCS and CCB do not turn up a description of the methods and locations of the records retention process for this project.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	CL: Please either describe the records retention process as required by this element or please point out where this information can be found in the project documentation.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	A description of the location and process for data storage is now presented in Section 6 of the Monitoring Report. In summary, electronic files are stored in three locations and all hard copy field reports are currently stored in one location. In addition the QA/QC procedures relating to data collection, processing and handling are now presented in Section 7 of the Monitoring Report. The text added to these sections as well as well as the Standard operating procedures referred to in Section 7 are attached with this response.
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending review of final MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	A description of the location and process for data storage is now presented in Section 6 of the Monitoring Report. In summary, electronic files are stored in three locations and all hard copy field reports are currently stored in one location. In addition the QA/QC procedures relating to data collection, processing and handling are now presented in Section 7 of the Monitoring Report. The text added to these sections as well as well as the Standard operating procedures referred to in Section 7 are attached with this response.
<b>Findings</b>	All document and records retention information is contained in the monitoring report in Section 7, as requested. Issue is addressed.

Item Number	4
<b>VCS Standard VCS Version 3 Requirements Document 08 October 2013, v3.4</b>	3.1.11 Where ARR, ALM, IFM or REDD project activities occur on wetlands, the project shall adhere to both the respective project category requirements and the WRC requirements, unless the expected emissions from the soil organic carbon pool or change in the soil organic carbon pool in the project scenario is deemed below de minimis as set out in Section 4.3.3, or can be conservatively excluded (as set out in Section 4.3.4), in which case the project shall not be subject to the WRC requirements.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	N/A

<b>Documents)</b>	
<b>Findings</b>	It is unclear if the project meets the WRC requirements.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	CL: Please explain how the project meets the WRC requirements.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	<p>The Project was approved prior to the introduction of the PRC guidelines and can continue to use the methodology for the first baseline period (see below confirmation emails from VCS) unless a new peat methodology to with applicability criteria relevant to the Project is approved by the VCS prior to the baseline renewal.</p> <p>Furthermore; the WRC guidelines are integrated into the AFOLU requirements V3.4 and as such these requirements are related to Project Requirements and Methodology Requirements. As we the Project was validated prior to the suspension of VM0004 the WRC Methodology Guidelines to not apply to this project. In addition there is currently no approved peat land methodology to which we can switch and therefore we have continued to use VM0004.</p> <p>There is one WRC criteria that relates to general Project Requirements; specifically Section 3.4.3 of the AFOLU Requirements which requires the project to have a buffer zone, specifically stating that:</p> <p>'Peat land projects shall establish a buffer zone to ensure that potential negative impacts to the hydrology in the project area, such as causing the water table in the project area to drop or otherwise negatively impacting the hydrology, are mitigated. The buffer zone may be inside or outside the geographic boundary of the project area. Where it is outside of the project area, the buffer zone shall be adjacent to the project geographic boundary and binding water management agreements with land holders in the buffer zone shall be in place by the time of the first verification. The size and shape of the buffer zone shall be sufficient to avoid such negative impacts on the project area, which may be demonstrated through peer reviewed literature or expert judgment.'</p> <p>The methodology applied by the Project (VM0004) has this requirement as an applicability criteria which was assessed and accepted at Project validation.</p>
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	<p>CL: Although the project was previously validated, it still must conform to new VCS updates, as stated in the introduction to each updated document. The exception is the methodology, which is grandfathered in until baseline renewal. The emails from VCS spoke to the methodology being grandfathered in, but they did not speak to the newly added requirements for WRC projects. Even though it would appear the WRC requirements fall within the methodology section of these rules, this particular rule (3.1.11) would then also apply in a circular way.</p> <p>Please provide further clarification or confirmation from VCS that the new WRC requirements from Section 4 of this document would not apply.</p>

<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>The Project was approved prior to the introduction of the PRC guidelines and can continue to use the methodology for the first baseline period (see below confirmation emails from VCS) unless a new peat methodology to with applicability criteria relevant to the Project is approved by the VCS prior to the baseline renewal.</p> <p>Furthermore; the WRC guidelines are integrated into the AFOLU requirements V3.4 and as such these requirements are related to Project Requirements and Methodology Requirements. As we the Project was validated prior to the suspension of VM0004 the WRC Methodology Guidelines to not apply to this project. In addition there is currently no approved peat land methodology to which we can switch and therefore we have continued to use VM0004.</p> <p>There is one WRC criteria that relates to general Project Requirements; specifically Section 3.4.3 of the AFOLU Requirements which requires the project to have a buffer zone, specifically stating that:</p> <p>'Peat land projects shall establish a buffer zone to ensure that potential negative impacts to the hydrology in the project area, such as causing the water table in the project area to drop or otherwise negatively impacting the hydrology, are mitigated. The buffer zone may be inside or outside the geographic boundary of the project area. Where it is outside of the project area, the buffer zone shall be adjacent to the project geographic boundary and binding water management agreements with land holders in the buffer zone shall be in place by the time of the first verification. The size and shape of the buffer zone shall be sufficient to avoid such negative impacts on the project area, which may be demonstrated through peer reviewed literature or expert judgment.'</p> <p>The methodology applied by the Project (VM0004) has this requirement as an applicability criteria which was assessed and accepted at Project validation.</p>
<p><b>Findings</b></p>	<p>Email correspondence with VCS (copy on file) clearly indicate that the project is exempt from the WRC requirements as it was validated prior to those requirements. Issue is addressed.</p>

Item Number	5
<p><b>VCS Standard VCS Version 3 Requirements Document 08 October 2013, v3.4</b></p>	<p>3.7.7 Where an event occurs that is likely to qualify as a loss event (see VCS document Program Definitions for definition of loss event) and VCUs have been previously issued, a loss event report shall be prepared and submitted to the VCS registry administrator, as follows:</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	<p>MR Section 6</p>
<p><b>Findings</b></p>	<p>It is unclear at this time if a loss event has occurred in the project area. This project has suffered some losses due to fire and some other carbon losses due to logging and soil draining. This element may be tabled until after the site visit.</p> <p>The PP sent an email to VCS on 18 October 2013 requesting clarification on a loss event. VCS replied on 22 October 2013, and the PP subsequently made changes to the MR and had to file a loss event report</p>

<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	CL: Please indicate if a loss event has occurred and what actions the project will be taking as a result.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	An email confirming the project must submit a Loss Event Report is provided with this response. A Loss Event report was submitted to VCS on the 31st October 2013 and is attached to this NCR.
<b>Findings</b>	Per PP's emails to VCS on 20 October 2013, it appears a loss event will be filed. Pending final information from PP.
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending Loss Event file and updated MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	An email confirming the project must submit a Loss Event Report is provided with this response. A Loss Event report was submitted to VCS on the 31st October 2013 and is attached to this NCR.
<b>Findings</b>	The verifier has confirmed the areas to be burned and the time periods as far as information is available. The verifier confirms the event did not result in a reversal. Addressed.

<b>Item Number</b>	<b>6</b>
<b>VCS Standard VCS Version 3 Requirements Document 08 October 2013, v3.4</b>	1) The loss event report shall be prepared using the VCS Loss Event Report Template. It shall include a conservative estimate of the carbon stocks lost from the project (ie, losses to stocks on which GHG credits have previously been issued to the project), based on monitoring of the full area affected by the loss event.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MR Section 6
<b>Findings</b>	Pending
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending Loss Event file and updated MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	The loss event report was prepared using the VCS Loss Event Report Template and it included a conservative estimate of the carbon stocks lost from the project (i.e., losses to stocks on which GHG credits have previously been issued to the project), based on monitoring of the full area affected by the loss event and in accordance with the VM0004 methodology calculation approach.
<b>Findings</b>	The project used the required template based on monitored losses. Addressed.

Item Number	7
<b>VCS Standard VCS Version 3 Requirements Document 08 October 2013, v3.4</b>	2) The loss event report shall be accompanied by a loss event representation signed by the project proponent and representing that the loss estimate is true and accurate in all material respects. The template for the loss event representation is available on the VCS website.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MR Section 6
<b>Findings</b>	Pending
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending Loss Event file and updated MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	The loss event report was accompanied by a loss event representation signed by the project proponent and representing that the loss estimate is true and accurate in all material respects.
<b>Findings</b>	The project included the required representation. Addressed.

Item Number	8
<b>VCS Standard VCS Version 3 Requirements Document 08 October 2013, v3.4</b>	3) The loss event report shall be submitted to the VCS registry administrator within two years of the loss event. Where a loss event report is not submitted within two years of the date the loss event occurred, the project shall no longer be eligible to issue VCUs.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MR Section 6
<b>Findings</b>	Pending
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending

<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending Loss Event file and updated MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 2 NCR/CL/OFI 20 November 2013</b>	Final sign-off of this item is pending final documentation with VCS.
<b>Final Round 2 Response from Project Proponent November 2013</b>	Matt Ram low has confirmed via phone that the Loss Event Report for the year 2010-2011 is not required as this event occurred prior to the introduction of this VCS requirement. The VCS clarification email will be forwarded to ESI early next week when it is provided (otherwise the verifier should call the VCS to confirm this). The Loss Event report for the year 2011/2012 has been submitted to VCS and Markit and the buffer credits have been put on hold. The confirmation email from Markit was provide to ESI via email on 21 November 2013.
<b>Findings</b>	The verifier received the VCS clarification email, and confirmed the event was reported two years from the same monitoring season, as is consistent with VCS review of this item. Addressed.

<b>Item Number</b>	<b>9</b>
<b>VCS Standard VCS Version 3 Requirements Document 08 October 2013, v3.4</b>	4) The VCS registry administrator shall put buffer credits from the AFOLU pooled buffer account on hold, in an amount equivalent to the estimated loss stated in the loss event report.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MR Section 6
<b>Findings</b>	Pending
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending Loss Event file and updated MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Pending
<b>Findings</b>	This is programmatic and will be addressed directly with VCS.

Item Number	10
<b>VCS Standard VCS Version 3 Requirements Document 08 October 2013, v3.4</b>	3.7.8 At the verification event subsequent to the loss event, the monitoring report shall restate the loss from the loss event and calculate the net GHG benefit for the monitoring period in accordance with Section 4.7.2 and the methodology applied. In addition, the following applies:
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	InfiniteEarth_MonitoringReportM2.docx
<b>Findings</b>	Pending
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending Loss Event file and updated MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	At the second verification event which is subsequent to the loss event, the monitoring report restates the loss from the loss event and calculates the net GHG benefit for the monitoring period in accordance with Section 4.7.2 and the VM0004 methodology.
<b>Findings</b>	Pending
<b>Final Round 2 NCR/CL/OFI 20 November 2013</b>	Pending review of final MR.
<b>Final Round 2 Response from Project Proponent November 2013</b>	The emissions from the Loss Event are calculated in Section 5 of the Monitoring Report.
<b>Findings</b>	Section 6 of the MR now states the net GHG benefit from the loss event.

Item Number	11
<b>VCS Standard VCS Version 3 Requirements Document 08 October 2013, v3.4</b>	1) Where the net GHG benefit of the project, compared to the baseline, for the monitoring period is negative, taking into account project emissions, removals and leakage, a reversal has occurred (see VCS document Program Definitions for definition of reversal) and buffer credits equivalent to the reversal shall be cancelled from the AFOLU pooled buffer account, as follows:
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	InfiniteEarth_MonitoringReportM2.docx
<b>Findings</b>	Pending

<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending Loss Event file and updated MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	The loss event as reported in the Loss Event Report and the Monitoring Report for the Project did not lead to the net GHG benefit of the project being negative
<b>Findings</b>	Pending
<b>Final Round 2 NCR/CL/OFI 20 November 2013</b>	Pending review of final MR.
<b>Final Round 2 Response from Project Proponent November 2013</b>	A new Section (Section 6) explains the relationship between the Loss Event Report and the Monitoring Report and confirms that the emissions in the monitoring period did not lead to the net GHG benefit of the Project being zero.
<b>Findings</b>	Section 6 of the MR now states the net GHG benefit from the loss event. The verifier confirms the event did not lead to a loss.

<b>Item Number</b>	<b>12</b>
<b>VCS Standard VCS Version 3 Requirements Document 08 October 2013, v3.4</b>	a) Where the total reversal is less than the number of credits put on hold after the submission of the loss event report, the VCS registry administrator shall cancel buffer credits equivalent to the reversal. Any remaining buffer credits shall be released from their hold status (though remain in the AFOLU pooled buffer account).
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	InfiniteEarth_MonitoringReportM2.docx
<b>Findings</b>	Pending
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending Loss Event file and updated MR.

<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	NA see NCR 11
<b>Findings</b>	Pending
<b>Final Round 2 NCR/CL/OFI 20 November 2013</b>	Pending review of final MR.
<b>Final Round 2 Response from Project Proponent November 2013</b>	Pending
<b>Findings</b>	N/A, as the verifier confirmed the event did not lead to a net negative loss.

<b>Item Number</b>	<b>13</b>
<b>VCS Standard VCS Version 3 Requirements Document 08 October 2013, v3.4</b>	b) Where the reversal is greater than stated by the loss event report, the full amount of buffer credits put on hold with respect to the submission of the loss event report shall be cancelled, and additional buffer credits from the AFOLU pooled buffer account shall be cancelled to fully account for the reversal.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	InfiniteEarth_MonitoringReportM2.docx
<b>Findings</b>	Pending
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending Loss Event file and updated MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	NA see NCR 11
<b>Findings</b>	Pending
<b>Final Round 2 NCR/CL/OFI 20 November 2013</b>	Pending review of final MR.
<b>Final Round 2 Response from Project Proponent November 2013</b>	Pending
<b>Findings</b>	N/A, as the verifier confirmed the event did not lead to a net negative loss.

Item Number	14
<b>VCS Standard VCS Version 3 Requirements Document 08 October 2013, v3.4</b>	2) Where the net GHG benefit for the monitoring period is positive, taking into account project emissions, removals and leakage (ie, all losses have been made up over the monitoring period), a reversal has not occurred and buffer credits put on hold after the submission of the loss event report shall be released from their hold status (but shall remain in the AFOLU pooled buffer account).
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	InfiniteEarth_MonitoringReportM2.docx
<b>Findings</b>	Pending
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending Loss Event file and updated MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 2 NCR/CL/OFI 20 November 2013</b>	Pending review of final MR.
<b>Final Round 2 Response from Project Proponent November 2013</b>	Pending
<b>Findings</b>	The verifier confirmed the event did not lead to a net negative loss. This is programmatic.

Item Number	15
<p><b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b></p>	<p>d) Carry out supplementary sampling for site specifications for each stratum, including as appropriate:            § Existing aboveground carbon stocks or vegetation types            § Present and past land tenure and land use;            § Baseline land use in the absence of project activity:            § Peat depth differences: Stratification of the project area by peat depth is important when depth in parts or all of the project area is less than the depth that is projected to be lost in the baseline scenario over time. For example, peat subsidence resulting from drainage can occur in the baseline scenario only until the available supply of peat has been oxidized, after which baseline emissions from drainage would be zero. Current literature on peat subsidence suggests that drained tropical peat in SE Asia subsides at an initial rate of 4.5 cm yr<sup>-1</sup>, translating into a loss of approximately 1.35 m over a 30-year project life<sup>14,15</sup>. If peat depth across the project area is greater than the depth of peat lost via subsidence and burning in the baseline scenario over the project life, then it is assumed that there is an adequate supply of carbon in peat in the project area to sustain the assumed baseline scenario and stratification by peat depth is unnecessary. Evidence for exceeding this peat depth threshold within the project boundary shall be presented in the PDD. If peat depth in parts or all of the project area is shallower than the depth that would be lost to drainage and burning in the baseline scenario over the project life, a peat depth map shall be created from sample points across the project area. The sampling design and methods for developing the peat depth map shall be outlined in the PDD.</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	<p>MR: Section 4.1.3.3, PD: 4.2.1</p>
<p><b>Findings</b></p>	<p>Agreed that supplementary sampling is not applicable because this activity was conducted in the baseline and relevant to validation. However, this may be subject to interpretation because depends on whether or not newly stratified areas established a "new" baseline which is different from the one created in the initial project stages.</p>
<p><b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b></p>	<p>CL: It appears that no supplementary sampling was conducted for periods prior to 2013 to confirm stratification. Please clarify what, if any supplementary sampling occurred for the second monitoring period.</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Round 1 Response from Project Proponent October 2013</b></p>	<p>Pending</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Final Round 1 NCR/CL/OFI 29 October 2013</b></p>	<p>Pending</p>
<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>This item relates to 'pre-existing conditions and the baseline scenario'. Supplementary sampling was conducted in the baseline and was part of the validation. I don't believe this item is relevant to the second verification.</p>

<b>Findings</b>	In the MR, it states in Section 4.1.2 that ex-post changes to ex-ante stratification occurred. It's not clear if the new stratification resulted in changes from the validation.
<b>Final Round 2 NCR/CL/OFI 20 November 2013</b>	CL: Although the response from Project Proponent would generally be correct for a verification, the project has been re-stratified, and thus, the VCS rules here apply. Please provide a general statement assuring the verifier that these rules on stratification were adhered to, as this is unclear in the MR.
<b>Final Round 2 Response from Project Proponent November 2013</b>	An additional statement has been added to Section 4.1.3.2 of the Monitoring Report confirming that the data collected during the 2010 which included exiting aboveground biomass stocks, site details on previous land use as well as peat depth measurements were applied to the 2010 image which was reclassified using more appropriate land cover classes.
<b>Findings</b>	The Project appeared to follow validated SOPs in regards to stratification. The ground-based data did not change, and the same image was used, just re-interpreted. Addressed

<b>Item Number</b>	<b>16</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	e) Do the final stratification of the baseline scenario based on supplementary information collected from d) above. Distinct strata should differ significantly in terms of their baseline net greenhouse gas emissions.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MR: Section 4.1.3.3, PD: 4.2.1
<b>Findings</b>	It is unclear if supplementary sampling occurred.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	CL: It appears that no supplementary sampling was conducted for periods prior to 2013 to confirm stratification. Please clarify what, if any supplementary sampling occurred for the second monitoring period.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	This item relates to 'pre-existing conditions and the baseline scenario'. Supplementary sampling was conducted in the baseline and was part of the validation. I don't believe this item is relevant to the second verification.
<b>Findings</b>	

<b>Final Round 2 NCR/CL/OFI 20 November 2013</b>	CL: Although the response from Project Proponent would generally be correct for a verification, the project has been re-stratified, and thus, the VCS rules here apply. Please provide a general statement assuring the verifier that these rules on stratification were adhered to, as this is unclear in the MR.
<b>Final Round 2 Response from Project Proponent November 2013</b>	An additional statement has been added to Section 4.1.3.2 of the Monitoring Report confirming that the data collected during the 2010 which included exiting aboveground biomass stocks, site details on previous land use as well as peat depth measurements were applied to the 2010 image which was reclassified using more appropriate land cover classes.
<b>Findings</b>	The Project appeared to follow validated SOPs in regards to stratification. The ground-based data did not change, and the same image was used, just re-interpreted. Addressed

<b>Item Number</b>	<b>17</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	Step 4: Leakage stratification: similar to Step 1 above, except areas analyzed are those to which activities are expected to be displaced (ex ante) or have been displaced (ex post) rather than the project boundary.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MR Section 4 and Validated SOPs
<b>Findings</b>	Pending
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending review of leakage files <i>ex post</i> .
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Pending

<b>Findings</b>	<p>Verifier confirms ex-post re-stratification has occurred in the monitoring period due to breach by agent of deforestation within the leakage belt at the northern boundary. Peat soil drained due to deforestation and affected carbon stocks have been accounted for properly. Peat experts have been consulted to confirm extent (area and depth) of drainage impacts on carbon stocks. Site classification has been determined by field visit and stratification based on buffered area of peat drainage impacts. The GIS files supplied by client have been confirmed as accurate. This item is addressed .</p>
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Item Number	18
<p><b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b></p>	<p>a) Define the factors influencing carbon stock changes in carbon pools.</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	<p>MR: Section 5.2.5</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b></p>	<p>Pending review of leakage files <i>ex post</i>.</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Round 1 Response from Project Proponent October 2013</b></p>	<p>Pending</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Final Round 1 NCR/CL/OFI 29 October 2013</b></p>	<p>Pending</p>
<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>Pending</p>
<p><b>Findings</b></p>	<p>Appropriate factors were defined. See above comment</p>

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	b) Collect local site classification maps/tables, the most updated land use/cover maps, land planning maps, aerial imagery, satellite images, soil maps, vegetation maps, landform maps, peat depth maps, and literature reviews of site information concerning key factors identified above.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Files from client: Leakage folder
Findings	Pending
Preliminary Round 1 NCR/CL/OFI 10 October 2013	Pending review of leakage files <i>ex post</i> .
Findings	Pending
Round 1 Response from Project Proponent October 2013	Pending
Findings	Pending
Final Round 1 NCR/CL/OFI 29 October 2013	Pending
Final Round 1 Response from Project Proponent 13 November 2013	Pending
Findings	Maps were collected and appropriate. See above comment

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	c) Stratify based on the information collected in (b) above.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Files from client: Leakage folder
Findings	Pending

<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending review of leakage files <i>ex post</i> .
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Pending
<b>Findings</b>	Stratification was conducted accordingly. See above comment

Item Number	21
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	The sampling framework, including sample size, plot size, plot shape and plot location should be specified in the PDD. When estimating existing carbon stocks within baseline strata for an avoided emissions project, permanent sampling plots are not necessary because these carbon stocks do not need to be tracked over time. Therefore, temporary sampling plots can be used. However, if project proponents choose to monitor increases in carbon stocks in the vegetation over the life of the project, permanent sampling plots must be installed. The number of sample plots is estimated based on accuracy and costs. The number, size and location of sampling plots shall be determined using the most current version of the CDM Tool —Calculation of the number of sample plots for measurements within A/R CDM project
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	PD: Section 3.5
<b>Findings</b>	Pending
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending review of leakage files <i>ex post</i> .
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Pending

<b>Findings</b>	Permanent sampling plots were not installed during this verification period.
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Item Number	22
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	<ul style="list-style-type: none"> <li>•Area where natural or anthropogenic disturbances (including fire, illegal logging and other land use change) occurred within the project boundary by date, location, biomass lost or affected, and the preventative or curative measures, if any implemented</li> </ul>
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MR: Section 5.2.2, project data files
<b>Findings</b>	Fire) MODIS Active Fire Product used in conjunction with Landsat historical burn detection to ground truth burn locations and determine burn size. Logging) Field visits were conducted around the perimeter by OFI to determine in logging encroachment had occurred during the monitoring period. Other land use change) Encroachment mentioned at northern boundary within the 3km buffer zone. Accuracy assessments not located.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	NCR: Please provide accuracy assessment for MODIS sensor data vs. Landsat burned area detection
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	<p>Email from Project Proponent on 09 October 2013: RSS group clarified that the MODIS Active Fire Product was used to pick locations for ground truthing burn sites. Landsat imagery used to map historic burn area size at the end of the fire season, this is more reliable due to using cloud free imagery.</p> <p>Formal Project Proponent response: We did not use the MODIS hotspot data in order assess the burned areas. The analysis was done based on Landsat. Therefore, it is not necessary to provide an accuracy assessment of the MODIS hotspots.</p> <p>The problem with the accuracy assessment of the burned area maps was that the field data did only contain information whether the area has burned or not, but not when it has burned (which is, of course, is mostly impossible to tell in the field if the fire has not been observed first hand). Of the burnt locations visited 100 % of the mapped burned areas were confirmed as burned.</p>

<b>Findings</b>	The GOLD-GOFC sourcebook, section 2.6.4 contains details to answer this clarification request. MODIS Active Fire Product is confirmed to meet accuracy standards as requirement in the Methodology, further the incorporation of Landsat to map burnt area size is well established in the literature and suited to the region given lack of high-resolution sensor imagery and persistent difficulties in obtaining clean imagery (i.e. clouds).
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Item Number	23
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	<ul style="list-style-type: none"> <li>•Two different strata may become similar enough to allow their merging into one stratum.</li> </ul>
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MR: Section 4.1.2
<b>Findings</b>	<p>Low vegetation and shrubland are close in characteristics in Landsat imagery. The verifier needs assurance that these were distinguished effectively.</p> <p>Project Proponent indicated that only if change was detected in the spectral differences between years for the cover type was a change area assigned. Assumed that remote sensing tools used and experience of interpreter were able to distinguish between shrub and low vegetation, spectral differences can vary widely (may also depend on quality of training sites, etc.). This is relevant because one is related to peat soils and factors into carbon calculations.</p>
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	NCR: Please explain why shrub and low vegetation were not merged in the semi-automated image classification process. In the imagery they look quite similar.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	The land cover classification was based on the land cover classification of the previous year and changes were mapped by analyzing the spectral difference of the Landsat images. Only if the spectral difference was large enough, a change area was designated and the appropriate land cover

	was assigned.
<b>Findings</b>	This NCR has been closed due to sufficient information provided by Project Proponent that confirms low vegetation and shrubland were readily distinguished by nuances in spectral difference.

Item Number	24
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	(3) GHG emissions due to deforestation (Eq. 89 & 90).
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Rimba Raya_M22010_2013.xlsx summary monitoring emissions table_tab column F (eq. 90), and summary project emissions table_tab cell M35 (Eq. 89), Deforestation tag (Columns C and I, and cell )
<b>Findings</b>	The calculations spreadsheet supplied by client clearly shows calculation.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	<p>NCR: It appears that a deforestation event occurred in 2012 - 2013 (referencing satellite image data from those years), and the deforestation event in the deforestation tab (cells L15 and M15) was incorrectly applied to multiple years in the Summary Monitoring Emissions_tab.</p> <p>OFI: Eq 89 on Rimba Raya_M22010_2013.xlsx summary project emissions table_tab cell M35 is not clearly marked with the equation number as are others in the monitoring calculation spreadsheet. The equations do not appear to be calculated for each strata as is done in the methodology.</p> <p>NCR: Deforestation emissions are not calculated correctly on Deforestation tab of Rimba Raya_M22010_2013.xlsx. Incorrect A(LCC) values are used in column C and I.</p>
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending

<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>NCR1 Response: A deforestation event did occur in 2012-2013 period along the northern edge of the buffer zone. This deforestation event and the subsequent drainage in the northern buffer zone had a modelled impact in the carbon accounting area. The area impacted was incorrectly applied in the spreadsheet and has subsequently been corrected. OFI1 Response: The column has been correctly labeled with Equation 89. NCR2 Response: Corrections have been made to the 'deforestation' tab to ensure that only area within the CCA are accounted for. The deforestation emissions that actually constitute activity shifting leakage are now represented on the tab titled 'Activity Shifting Leakage'.</p>
<p><b>Findings</b></p>	<p>First NCR Closed. Rimba Raya_M22010_2013V2.xlsx deforestation tab now only summarizes "Deforestation affecting the carbon accounting area only occurred in the monitoring period 2012-2013". This appears to be correctly applied to Monitoring Emissions_tab (column D eq VM004 - 122), OFI Closed: Equation 89 is numbered on Rimba Raya_M22010_2013V2.xlsx summary project emissions table_tab cell column M, however the equation appear to be calculated for each strata as is done in the methodology. Second NCR Open: Deforestation emissions appear to be calculated differently in Rimba Raya_M22010_2013V2.xlsx? There is an entire table of emissions in the deforestation tab (H2 - N15 in the original version, Rimba Raya_M22010_2013.xlsx that appears to be unaccounted for in Rimba Raya_M22010_2013V2.xlsx. It is unclear what these emissions represented in the original version and where they are accounted for in the updated?</p>
<p><b>Final Round 2 NCR/CL/OFI 20 November 2013</b></p>	<p>NCR: Please describe why deforestation emissions are calculated so differently in Rimba Raya_M22010_2013V2.xlsx? There is an entire table of emissions in the deforestation tab (H2 - N15 in the original version, Rimba Raya_M22010_2013.xlsx. that appears to be unaccounted for in Rimba Raya_M22010_2013V2.xlsx. Please describe what these emissions represented in the original version and where they are accounted for in the updated?</p>
<p><b>Final Round 2 Response from Project Proponent November 2013</b></p>	<p>Deletion of deforestation emissions was corrected on the deforestation tab of the calculator. The original Table was accidentally omitted during the restructure to address the NCR related to conducting the calculations on a strata by strata basis.</p>
<p><b>Findings</b></p>	<p>Finding Closed: Issue addressed on Rimba Raya_M22010_2013V3.xlsx deforestation tab. (two tables now appear).</p>

<p><b>Item Number</b></p>	<p><b>25</b></p>
<p><b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b></p>	<p>An average emission factor (EF<sub>logging,i</sub>) 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)</p>

<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Rimba Raya_M22010_2013.xlsx TimberExtraction_2010_2013 tab cells (B15). InfiniteEarth_MonitoringReportM2.docx section 4.1.6 step 3, and VM0004 Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, v1-0 section 19.2.1.1
<b>Findings</b>	The calculation made in Rimba Raya_M22010_2013.xlsx TimberExtraction_2010_2013 tab cells (B15) for EFlogging,I, does not match equation 92 in VM0004 v1.0. There appears to be an extra term included in the calculation of EFlogging,I, in spreadsheet Rimba Raya_M22010_2013.xlsx for " <u>Non-extracted Biomass Carbon (t C)</u> ". Equation 92 allows the inclusion of <u>average carbon extracted</u> as timber per logging gap k in stratum i, and <u>average carbon damaged</u> as a result of logging per logging gap k in stratum i.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	NCR: The calculation made in Rimba Raya_M22010_2013.xlsx TimberExtraction_2010_2013 tab cells (B15) for EFlogging,I, does not match equation 92 in VM0004 v1.0. There appears to be an extra term included in the calculation of EFlogging,I, in spreadsheet Rimba Raya_M22010_2013.xlsx for " <u>Non-extracted Biomass Carbon (t C)</u> ". Equation 92 allows the inclusion of <u>average carbon extracted</u> as timber per logging gap k in stratum i, and <u>average carbon damaged</u> as a result of logging per logging gap k in stratum i.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	This figure was already validated and verified at the first monitoring period as required by the methodology. It is acknowledged that the calculation carried out in the spreadsheet does not conform to Equation 92 and may have caused some confusion, however as noted it has already been verified. Within the updated version of the calculator Equation 92 has been conducted (see green highlighted cells starting at M5). This demonstrates that the Mawas data was adjusted by a multiplier of 1.3 (average DBH in Project area/ average DBH in Mawas area) to account for the larger diameter trees found to be extracted in the Project Area.
<b>Findings</b>	No response and the issue is still present in Rimba Raya_M22010_2013V2.xlsx GP_11/15/2013. During call on 11/18/13 issue was resolved. 1.3 represents a conservative value that was added in during the validation to reflect the size of trees in Rimba Raya. This is actually out of the scope of this verification Finding Closed.

<b>Item Number</b>	<b>26</b>
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<p><b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b></p>	<p>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.</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	<p>MR: Section 2.2.3 and 4.1.6</p>
<p><b>Findings</b></p>	<p>Gap detection using imagery is difficult due to site characteristics. There was no mention of resolution, which could be used in MR. LIDAR was mentioned but not implemented. Field logging gap detection was done. No higher resolution data than Landsat is/was available.</p>
<p><b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b></p>	<p>NCR: Although the Verifier understands why LIDAR was not able to be used during this monitoring event, the requirement here is that aerial photos, imagery or RS data needs to be used at each monitoring event. The MR asserts that improved data sources should be used as they come available, but the verifier does not see this in the requirement for 19.2.1.2. Please explain how the field patrols would be able to comprehensively detect logging gaps more accurately than the aerial survey, and how this results in conservative estimates as required in 19.2.1.2 and the VCS Deviation allowances. Please include this justification in the newly added text under Section 2.2 of the Monitoring Report.</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Round 1 Response from Project Proponent October 2013</b></p>	<p>Pending</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Final Round 1 NCR/CL/OFI 29 October 2013</b></p>	<p>Pending</p>

<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>The Project did not use high resolution imagery in the monitoring period as it was not available (i.e. due to persistent cloud cover or lack of aerial photos/LIDAR). The purpose of the monitoring for estimating tree gaps in the project area is to track commercial logging. Commercial logging removes trees and drains peatlands through the establishment of canals in the Project Area. These emissions need to be accounted for, however it is worth noting that the aboveground biomass pool estimated in the Project area is verging on di minimis (i.e. it represents approximately 6% of total project area). The constant patrols by OFI staff and engagement with the communities by World Education confirm that 'commercial logging' operations are not being conducted in the Project Area anymore. This activity finished in the late 1990's. The Project does not stop small scale tree extraction by villages for housing and canoes and does not account for this tree loss unless the area affected is greater than 30m which would then be detected by Landsat images as a change in land cover. The communities do not have the equipment or funds to extend canals into the Project Area and there has been no evidence of such activity reported by OFI or World Education with the exception of the incursion by the oil palm company to the northern buffer zone. For the monitoring period covered by this verification any tree extraction that did not trigger a land use change in the Landsat images is di minimis (i.e. in the absence of peat drainage, even if half of the trees were lost to deforestation the impact on the carbon account would be di minimis). The Project intends to seek high resolution images/photos each year when they are available.</p>
<p><b>Findings</b></p>	<p>Site visit observations confirmed that if any logging were to occur in the project area that the patrols would certainly find it. The project area is very difficult to access, and the logging gap would become very obvious as well as involve several members of the communities. All commerce in the area involves the river. Any logging that occurs is bound to show in the transport of the milled wood down the river. This activity would not only be well known by the river communities, but they would also have to sell the wood locally, and that would also lead to the activity being well known. Further, the project is seen in the communities as a very positive thing. Any logging that occurs is going to be known and will most likely cause people to be upset with the loggers. It seems that the patrols from OFI will definitely observe this disturbance if it happens again.</p> <p>There still appears to be a typo in the 4.2.6 Step 1 of the MR.</p>
<p><b>Final Round 2 NCR/CL/OFI 20 November 2013</b></p>	<p>CL: Please correct the typos in 4.1.6 Step 1 of the MR "duir8ng the M! monitoring period."</p>
<p><b>Final Round 2 Response from Project Proponent November 2013</b></p>	<p>Spelling was corrected in Section 4.1.6.</p>
<p><b>Findings</b></p>	<p>Typos have been corrected in the MR v3. Addressed.</p>

Item Number	27
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	<p>Step 1. During the first monitoring event, geo-reference all logging gaps as detected in the high resolution imagery collected during the monitoring event.</p>
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	<p>Section 5.4 of the M2 Monitoring Report</p>
<b>Findings</b>	<p>Logging gaps were georeferenced during field visit. See comment in 19.2.1.2 above</p>
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	<p>NCR: See 19.2.1.2 above</p>
<b>Findings</b>	<p>Pending</p>
<b>Round 1 Response from Project Proponent October 2013</b>	<p>Pending</p>
<b>Findings</b>	<p>Pending</p>
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	<p>Pending</p>
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	<p>The existing and known access points for timber harvest are regularly visited to monitor change as described in the field reports. No new commercial harvesting activity was noted and any deforestation was detected in the Landsat and reported under the relevant deforestation or fire emissions section.</p>
<b>Findings</b>	<p>See comment in 19.2.1.2 above.</p>
<b>Final Round 2 NCR/CL/OFI 20 November 2013</b>	<p>CL: Please correct the typos in 4.1.6 Step 1 of the MR "duir8ng the M! monitoring period."</p>
<b>Final Round 2 Response from Project Proponent November 2013</b>	<p>Spelling was corrected in Section 4.1.6.</p>
<b>Findings</b>	<p>Typos have been corrected in the MR v3. Addressed.</p>

Item Number	28
<p><b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b></p>	<p>For any data provided by experts, the PDD and/or monitoring reports shall record the expert's name, affiliation, and principal qualification as an expert– plus inclusion of a 1-page summary CV for each expert consulted, included in an annex.</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	<p>MR: Section 5.2.3, file from client</p>
<p><b>Findings</b></p>	<p>The peat expert's opinion was noted in MR but did not include specifics about them (name, affiliation, etc.)</p>
<p><b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b></p>	<p>NCR: Please include peat expert's name, affiliation, and principal qualification as an expert in MR</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Round 1 Response from Project Proponent October 2013</b></p>	<p>The following details of the peat experts have been added to Section 5.2.3, Step 2 of the monitoring report  Two peat experts were consulted on the drainage impact in the Northern Buffer zone:</p> <ol style="list-style-type: none"> <li>Marcel J. Silvius  Head of Programme and Strategy  Wetlands &amp; Livelihoods; Wetlands &amp; Climate  Wetlands International  Phone: +31 318 660924  Email: marcel.silvius@wetlands.org  www.wetlands.org  Qualification: Degree in Biology and Tropical Soil Sciences from the State University of Utrecht and Nature Conservation from the Agricultural University of Wageningen</li> <li>Aswin Usup, PhD  Head of Research Center for peat land fire and Land Rehabilitation  Palangka Raya University,  Central Kalimantan, Indonesia  Email: gnmas@yahoo.com  Qualification: PhD Graduate School of Environmental Earth Science, Hokkaido University (S-3), Sapporo, Japan</li> </ol> <p>Detailed CVs of the peat experts detailing their qualifications and experience that demonstrates their position as a peat expert.</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Final Round 1 NCR/CL/OFI 29 October 2013</b></p>	<p>Pending review of revised MR.</p>

<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>The following details of the peat experts have been added to Section 5.2.3, Step 2 of the monitoring report Two peat experts were consulted on the drainage impact in the Northern Buffer zone: 1. Marcel J. Silvius Head of Programme and Strategy Wetlands &amp; Livelihoods; Wetlands &amp; Climate Wetlands International Phone: +31 318 660924 Email: marcel.silvius@wetlands.org www.wetlands.org Qualification: Degree in Biology and Tropical Soil Sciences from the State University of Utrecht and Nature Conservation from the Agricultural University of Wageningen 2. Aswin Usup, PhD Head of Research Center for peat land fire and Land Rehabilitation Palangka Raya University, Central Kalimantan, Indonesia Email: gnmas@yahoo.com Qualification: PhD Graduate School of Environmental Earth Science, Hokkaido University (S-3), Sapporo, Japan Detailed CVs of the peat experts detailing their qualifications and experience that demonstrates their position as a peat expert.</p>
<p><b>Findings</b></p>	<p>MR V2.0 8 November, 2013 now includes reference to the details of peat experts</p>

Item Number	29
<p><b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b></p>	<p>Step 7. At each monitoring event, repeat Steps 1-6, estimating the new total area of impact of canals constructed for logging activities. Monitoring canals is conducted at regular (annual) intervals to account for changes in the total length of the canal network due to potential expansion of canals into new areas over time. Once a canal has been created, it is conservative to include this in the network during each monitoring event even if it is no longer active.</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	<p>MR: Section 4.1.6</p>
<p><b>Findings</b></p>	<p>Field visits were conducted to monitor logging gaps; imagery not used to detect logging gaps due to inherent difficulty in detection</p>
<p><b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b></p>	<p>NCR: No high resolution imagery was used to reassess logging gaps elsewhere in the project area after the 2nd monitoring period? Please refer to 19.2.1.2 above.</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Round 1 Response from Project Proponent October 2013</b></p>	<p>Pending</p>
<p><b>Findings</b></p>	<p>Pending</p>

<p><b>Final Round 1 NCR/CL/OFI 29 October 2013</b></p>	<p>Pending 19.2.1.2 above.</p>
<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>The Project did not use high resolution imagery in the monitoring period as it was not available (i.e. due to persistent cloud cover or lack of aerial photos/LIDAR). The purpose of the monitoring for estimating tree gaps in the project area is to track commercial logging. Commercial logging removes trees and drains peatlands through the establishment of canals in the Project Area. These emissions need to be accounted for, however it is worth noting that the aboveground biomass pool estimated in the Project area is verging on di minimis (i.e. it represents approximately 6% of total project area). The constant patrols by OFI staff and engagement with the communities by World Education confirm that 'commercial logging' operations are not being conducted in the Project Area anymore. This activity finished in the late 1990's. The Project does not stop small scale tree extraction by villages for housing and canoes and does not account for this tree loss unless the area affected is greater than 30m which would then be detected by Landsat images as a change in land cover. The communities do not have the equipment or funds to extend canals into the Project Area and there has been no evidence of such activity reported by OFI or World Education with the exception of the incursion by the oil palm company to the northern buffer zone. For the monitoring period covered by this verification any tree extraction that did not trigger a land use change in the Landsat images is di minimis (i.e. in the absence of peat drainage, even if half of the trees were lost to deforestation the impact on the carbon account would be di minimis). The Project intends to seek high resolution images/photos each year when they are available.</p>
<p><b>Findings</b></p>	<p>Site visit observations confirmed that if any logging were to occur in the project area that the patrols would certainly find it. The project area is very difficult to access, and the logging gap would become very obvious as well as involve several members of the communities. All commerce in the area involves the river. Any logging that occurs is bound to show in the transport of the milled wood down the river. This activity would not only be well known by the river communities, but they would also have to sell the wood locally, and that would also lead to the activity being well known. Further, the project is seen in the communities as a very positive thing. Any logging that occurs is going to be known and will most likely cause people to be upset with the loggers. It seems that the patrols from OFI will definitely observe this disturbance if it happens again.</p> <p>There still appears to be a typo in the 4.2.6 Step 1 of the MR.</p>
<p><b>Final Round 2 NCR/CL/OFI 20 November 2013</b></p>	<p>CL: Please correct the typos in 4.1.6 Step 1 of the MR "duir8ng the M! monitoring period."</p>
<p><b>Final Round 2 Response from Project Proponent November 2013</b></p>	<p>Spelling was corrected in Section 4.1.6.</p>
<p><b>Findings</b></p>	<p>Typos have been corrected in the MR v3. Addressed.</p>

Item Number	30
<p><b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b></p>	<p>Step 8: In the field, measure the average drainage depth along transects perpendicular to the canals. The measurement where the water table is lowest should be assumed to be the depth to which peat is drained across the entire area of impact            Alog Step 8: In the field, measure the average drainage depth along transects perpendicular to the canals. The measurement where the water table is lowest should be assumed to be the depth to which peat is drained across the entire area of impact.</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	<p>M22010_2013.xlsx calculator</p>
<p><b>Findings</b></p>	<p>Annex 4 not yet provided.</p>
<p><b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b></p>	<p>Pending receipt and review of Annex 4.</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Round 1 Response from Project Proponent October 2013</b></p>	<p>Pending</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Final Round 1 NCR/CL/OFI 29 October 2013</b></p>	<p>Pending receipt and review of Annex 4.</p>
<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>Pending</p>
<p><b>Findings</b></p>	<p>Have still not seen Annex 4 "Oil Palm Drainage Report" in files from client yet.</p>
<p><b>Final Round 2 NCR/CL/OFI 20 November 2013</b></p>	<p>Pending receipt and review of Annex 4.</p>
<p><b>Final Round 2 Response from Project Proponent November 2013</b></p>	<p>Annex 4 has been provided in response to this NCR</p>
<p><b>Findings</b></p>	<p>Client has provided Annex 4 "Oil Palm Drainage Report" detailing field methods for measuring average drainage depth (41cm). Based on field measurements, lowest depth (60cm) should be assumed to be depth of peat drained across the entire impact area, Rimba Raya_M22010_2013V3.xlsx tab LoggingDrainage2010_13 shows a depth of 55cm used for this calculation.</p> <p>It is unclear which depth was used for the water table drainage - 55cm or 60cm.</p>

<b>Final Round 3 NCR/CL/OFI 03 December 2013</b>	CL: Per Annex 4, Step 8 specifies that where the water table was lowest should be assumed to be the peat drained across the entire impacted area. Based on field measurements, lowest depth was 60cm and Rimba Raya_M22010_2013V3.xlsx tab LoggingDrainage2010_13 shows a depth of 55cm used for this calculation. Please clarify.
<b>Final Round 3 Response from Project Proponent 04 December 2013</b>	The calculator has been correct to use a figure of 60cm. Subsequently all figures in the tables of the monitoring report and the associated documentation have been corrected.
<b>Final Findings</b>	The calculator has been revised, which has been confirmed by the verifier. Addressed.

<b>Item Number</b>	<b>31</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	The sampling plan for estimating average drainage depth shall be outlined in the monitoring report.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MR: Section 5.2.3
<b>Findings</b>	Annex 4 not yet provided.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending receipt and review of Annex 4.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending receipt and review of Annex 4.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Pending
<b>Findings</b>	Have still not seen Annex 4 "Oil Palm Drainage Report" in files from client yet.
<b>Final Round 2 NCR/CL/OFI 20 November 2013</b>	Pending receipt and review of Annex 4.

<b>Final Round 2 Response from Project Proponent November 2013</b>	Annex 4 has been provided in response to this NCR. In addition during the field visit the auditors were taken to the location of the water table measurements and provided with an explanation of how the field measurements were taken.
<b>Findings</b>	Client has provided Annex 4 "Oil Palm Drainage Report" detailing field methods for measuring average drainage depth (41cm). Based on field measurements, lowest depth (60cm) should be assumed to be depth of peat drained across the entire impact area, Rimba Raya_M22010_2013V3.xlsx tab LoggingDrainage2010_13 shows a depth of 55cm used for this calculation.  It is unclear which depth was used for the water table drainage - 55cm or 60cm.
<b>Final Round 3 NCR/CL/OFI 03 December 2013</b>	CL: Per Annex 4, Step 8 specifies that where the water table was lowest should be assumed to be the peat drained across the entire impacted area. Based on field measurements, lowest depth was 60cm and Rimba Raya_M22010_2013V3.xlsx tab LoggingDrainage2010_13 shows a depth of 55cm used for this calculation. Please clarify.
<b>Final Round 3 Response from Project Proponent 04 December 2013</b>	The calculator has been correct to use a figure of 60cm. Subsequently all figures in the tables of the monitoring report and the associated documentation have been corrected.
<b>Final Findings</b>	The calculator has been revised, which has been confirmed by the verifier. Addressed.

<b>Item Number</b>	<b>32</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	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.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Rimba Raya_M22010_2013.xlsx ABBIomassburn tabs
<b>Findings</b>	GIS contains 3 years of areas burned polygons- 1) burned2011_projectarea.shp (presumed to be 2010) attribute table notes 2789 ha, I calculate 2789 ha 2) burned2012_projectarea.shp attribute table notes 1071 ha, I calculate 664 ha 3) burned2013_projectarea.shp attribute table notes 18 ha, I calculate 18 ha. Also, .shp files appear to contain burned dates which overlap (according to date in attribute table), for instance 2012 contains a few 2013 burn dates. The burn date overlap is presumed to occur due to imagery acquisition date.

<p><b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b></p>	<p>NCR: Please explain the difference in burned area calculations for year 2012. GIS contains 3 years of areas burned polygons - 1) burned2011_projectarea.shp (presumed to be 2010) attribute table notes 2789 ha; ESI calculates 2789 ha; 2) burned2012_projectarea.shp attribute table notes 1071 ha; ESI calculates 664 ha; 3) burned2013_projectarea.shp attribute table notes 18 ha; ESI calculates 18 ha. Also, .shp files appear to contain burned dates which overlap (according to date in attribute table). For instance, 2012 contains a few 2013 burn dates. The burn date overlap is presumed to occur due to imagery acquisition date. Please clarify.</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Round 1 Response from Project Proponent October 2013</b></p>	<p>Pending</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Final Round 1 NCR/CL/OFI 29 October 2013</b></p>	<p>Pending</p>
<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>Differences in the burnt area shapefiles and the figures presented in the calculator are acknowledged and have been corrected. New shapefiles have been provided. The source of the error came from the requirement to monitor fire within the carbon accounting area as well as a 1km buffer around the carbon accounting area, however the deduction calculations need only be made for the burn within the carbon accounting area. The area burnt previously reported in the calculator was for the entire area monitored for fire. These changes have lead to a reduction in the emissions from fire.</p>
<p><b>Findings</b></p>	<p>Burned areas updated correctly per GIS, carbon calculator and MR for 2011, 2012, but not for 2013.</p>
<p><b>Final Round 2 NCR/CL/OFI 20 November 2013</b></p>	<p>NCR: Please fix burnt area for 2013 (year 1 monitoring), .shp land cover classes still do not match to carbon calculator and MR</p>
<p><b>Final Round 2 Response from Project Proponent November 2013</b></p>	<p>Corrections to area burnt for 2013 have now been made. The area reported is consistent with the shape file for the Carbon Accounting Area. The difference in area was a result of accounting for the burnt areas in the Carbon Accounting Area (CAA) and the buffer zone. The burnt areas in the CAA need only be accounted for.</p>
<p><b>Findings</b></p>	<p>Area burned in 2011 in Table 24 of MR contains wrong sum value of 3920.4 ha and should be 2789 ha per AB Biomass burn 2010 tab in Rimba Raya_M22010_2013V3.xlsx and CAA_BurntAreaLandClass2010_2011.shp. All land cover classes correct in Table 24. Area burned in 2013 contains wrong values for land cover classes in Table 24 of MR and also in ABBiomassburn2013 tab in Rimba Raya_M22010_2013V3.xlsx, sum in Table 24 of MR is correct but spreadsheet contains wrong land cover classes.</p>
<p><b>Final Round 3 NCR/CL/OFI 03 December 2013</b></p>	<p>NCR: Please correct burnt area for 2013 (year 1 monitoring) in Table 24, .shp land cover classes still do not match to MR.</p> <p>NCR: Area burned in 2011 in Table 24 of MR contains wrong sum value of 3920.4 ha and should be 2789 ha per AB Biomass burn 2010 tab in Rimba Raya_M22010_2013V3.xlsx and CAA_BurntAreaLandClass2010_2011.shp.</p>

<b>Final Round 3 Response from Project Proponent 04 December 2013</b>	The figures in Table 24 have been corrected to math the spreadsheet and the shapefiles.  2nd item corrected as with above.
<b>Final Findings</b>	The verifier confirmed the final corrections and appropriateness. Addressed.

<b>Item Number</b>	<b>33</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	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.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MR: Section 5.2.2
<b>Findings</b>	RSS group clarified that the MODIS Active Fire Product was used to pick locations for ground truthing burn sites. Landsat imagery used to map historic burn area size at the end of the fire season, this is more reliable due to using cloud free imagery. Refer to section 15b above.  Response from client is sufficient to satisfy this requirement, pending accuracy assessment review,
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending accuracy assessment review.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	We did not use the MODIS hotspot data in order assess the burned areas. The analysis was done based on Landsat. Therefore, it is not necessary to provide an accuracy assessment of the MODIS hotspots. The problem with the accuracy assessment of the burned area maps was that the field data did only contain information whether the area has burned or not, but not when it has burned (which is, of course, is mostly impossible to tell in the field if the fire has not been observed first hand). Of the burnt locations visited 100 % of the mapped burned areas were confirmed as burned.

<b>Findings</b>	<p>EMJ: Able to close previous NCR because of supplemental information provided by client</p> <p>EMJ 2013-11-20: Further investigation into best available methods for fire detection in this region have confirmed methods used by Project Proponents are in compliance in accordance with GOFC-GOLD sourcebook</p>
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Item Number	34
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	Step 2b. Estimate emission factor for peat burning (see Eq. 117, 118, 119 & 120)
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Rimba Raya_M22010_2013.xlsx AB Biomass Burn_tabs (columns D E and F)
<b>Findings</b>	This calculation is performed in the monitoring calculation spreadsheet on Tab "PeatBurn" column D,E,F, commencing row 31. There appears to be a problem with the calculation of equation VM0004 - 119, the Global Warming Potential CH <sub>4</sub> (= 21 for the first commitment period); t CO <sub>2</sub> -e (t CH <sub>4</sub> )-1 was not used in the calculation
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	NCR: please use the Global Warming Potential CH <sub>4</sub> (= 21 for the first commitment period); t CO <sub>2</sub> -e (t CH <sub>4</sub> )-1 in the calculation of equation VM0004 - 119
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	<p>Figures of GWP have been updated in the calculator and Section 3.1 of the monitoring report for the period Jan 2013 - Jun 2013 (i.e. the second commitment period).</p> <p>The figure applied for the second monitoring period utilized a GWPC<sub>4</sub> = 21 until the end of 2012 (the first commitment period) and then applied GWPC<sub>4</sub> = 25 for the 2013 covered period which is the figure from the Fourth Assessment Report.</p> <p>The figure applied for the second monitoring period utilized a GWPN<sub>20</sub> = 310 until the end of 2012 (the first commitment period) and then applied GWPN<sub>20</sub> = 298 for the 2013 covered period which is the figure from the Fourth Assessment Report.</p> <p>Available from: <a href="http://www.ec.gc.ca/ges-ghg/default.asp?lang=En&amp;n=CAD07259-1">http://www.ec.gc.ca/ges-ghg/default.asp?lang=En&amp;n=CAD07259-1</a></p>
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending review of final calculator.

<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>Figures of GWP have been updated in the calculator and Section 3.1 of the monitoring report for the period Jan 2013 - Jun 2013 (i.e. the second commitment period). The figure applied for the second monitoring period utilized a GWPCH4 = 21 until the end of 2012 (the first commitment period) and then applied GWPCH4 = 25 for the 2013 covered period which is the figure from the Fourth Assessment Report. The figure applied for the second monitoring period utilized a GWPN2O = 310 until the end of 2012 (the first commitment period) and then applied GWPN2O = 298 for the 2013 covered period which is the figure from the Fourth Assessment Report.</p> <p>Available from: <a href="http://www.ec.gc.ca/ges-ghg/default.asp?lang=En&amp;n=CAD07259-1">http://www.ec.gc.ca/ges-ghg/default.asp?lang=En&amp;n=CAD07259-1</a></p>
<p><b>Findings</b></p>	<p>The tables for GWP in the monitoring report have been updated (Section 3.1). However, It is not clear how <u>any</u> of these values are applied in the Calculation spreadsheet (Rimba Raya_M22010_2013V2.xlsx PeatBurn Tab, Row I...where equation 119 is calculated). The calculation of equation 119 never references the GWPCH4 listed on the worksheet (cell E55). Further, there is only one value listed on this calculation sheet for GWPCH4 and does not vary by monitoring period as indicated in the monitoring report (Section 3.1).</p>
<p><b>Final Round 2 NCR/CL/OFI 20 November 2013</b></p>	<p>NCR: Please use the Global Warming Potential for CH4 listed in Section 3.1 of the monitoring report in the calculation of equation VM0004 - 119.</p>
<p><b>Final Round 2 Response from Project Proponent November 2013</b></p>	<p>It is recognized that the GWP figures were not updated for 2013 reporting year in the calculator. This has now been corrected. In making the corrections a mistake was found in Equation 119 on the tab 'Peat Burn'. This has now been corrected in the current version.</p>
<p><b>Findings</b></p>	<p>Finding Closed: Issue addressed in Rimba Raya_M22010_2013V3.xlsx peat burn tab, row I in calculation of equation 119, global warming potentials for CH4 are used (correct values that vary by year as is stated in the monitoring report.).</p>

Item Number	35
<p><b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b></p>	<p>The area of deforestation should be tracked directly using an accuracy assessment criterion of 80% or more. A description of the methods used to detect land cover change shall be included in the PDD.</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	<p>MR: Section 5.2.3</p>

<b>Findings</b>	In communication with client (email 10/9/2013) they noted that the accuracies of the two land cover maps which go into each change period are combined (or better the uncertainties 1 - acc) by error propagation. The result is then the accuracy of the change. Cited in the REDD sourcebook.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	NCR: Please include accuracy assessment for deforestation in later version of MR
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending final review of MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	The accuracy of the Deforestation is calculated by combining the accuracies from the two LC maps under consideration for the given change interval. This is a common technique for calculating the accuracy for change detection maps. The problem and solution for accuracy assessment of change datasets (as is the deforestation dataset) is described in Congalton and Green "Assessing the Accuracy of remotely sensed data". Text describing the combination of accuracies is included in 4.1.3.5.
<b>Findings</b>	Description of method is provided, but it is unclear how it meets the 80% accuracy assessment.
<b>Final Round 2 NCR/CL/OFI 20 November 2013</b>	Pending
<b>Final Round 2 Response from Project Proponent November 2013</b>	Pending
<b>Findings</b>	Their method for combining accuracies appears to be good practice in remote sensing. However, project proponent has not yet filled out section 4.1.3.5 in MR  Method used by PP to derive deforestation accuracy is in good remote sensing practice as confirmed by peer-reviewed literature. A section (4.1.3.5) was added to the MR outlining deforestation accuracy assessments for the 3-yr monitoring period and a reference given to guide the reader of where to look to confirm their methods. However, it is not possible to verify the accuracy assessments for years 2011-2012 without reference points. Also, it is difficult to tell if reference sites and training sites were within the same sampling unit and thus in violation of the spatial independence rule (Congalton and Green book, 1999).
<b>Final Round 3 NCR/CL/OFI 03 December 2013</b>	2013-11-25 CL: Please confirm for all deforestation accuracy assessments in all years that reference points and training sites were not within the same sample unit (violation of spatial independence rule, Congalton and Green 1999).

<b>Final Round 3 Response from Project Proponent 04 December 2013</b>	A statement has been added to Section 8.2 and footnote 17.
<b>Final Findings</b>	The PP confirms the appropriate sample was taken with no overlapping reference and training points. Addressed.

<b>Item Number</b>	<b>36</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	Monitoring for land cover change should occur annually.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MR Section 5
<b>Findings</b>	Pending review of final MR
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending
<b>Findings</b>	Monitoring is occurring annually with Landsat imagery after each growing season. Addressed.

<b>Item Number</b>	<b>37</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	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.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	End of MR document
<b>Findings</b>	Confusion matrices by RSS developed classification scheme for all years. Ground truth data was incorporated into 2013 LC map. Years 2010-2012 was done by re-interpretation by independent interpreter, no historic ground truth data existed for those years.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending accuracy assessment review.

<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	See response in section 19.2.3
<b>Findings</b>	Response from client in section 19.2.3 is sufficient to satisfy this requirement.

Item Number	38
<p><b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b></p>	<p>For any data provided by experts, the PDD shall record the expert's name, affiliation, and principal qualification as an expert—plus inclusion of a 1-page summary CV for each expert consulted, included in an annex.</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	<p>MR Section 5.2</p>
<p><b>Findings</b></p>	<p>The peat expert's opinion was noted in MR but did not include specifics about them (name, affiliation, etc.)</p>
<p><b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b></p>	<p>NCR: Please include peat expert's name, affiliation, and principal qualification as an expert in MR</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Round 1 Response from Project Proponent October 2013</b></p>	<p>The following details of the peat experts have been added to Section 5.2.3, Step 2 of the monitoring report Two peat experts were consulted on the drainage impact in the Northern Buffer zone:</p> <ol style="list-style-type: none"> <li>1. Marcel J. Silvius Head of Programme and Strategy Wetlands &amp; Livelihoods; Wetlands &amp; Climate Wetlands International Phone: +31 318 660924 Email: marcel.silvius@wetlands.org www.wetlands.org Qualification: Degree in Biology and Tropical Soil Sciences from the State University of Utrecht and Nature Conservation from the Agricultural University of Wageningen</li> <li>2. Aswin Usup, PhD Head of Research Center for peat land fire and Land Rehabilitation Palangka Raya University, Central Kalimantan, Indonesia Email: gnmas@yahoo.com Qualification: PhD Graduate School of Environmental Earth Science, Hokkaido University (S-3), Sapporo, Japan</li> </ol> <p>Detailed CVs of the peat experts detailing their qualifications and experience that demonstrates their position as a peat expert.</p>
<p><b>Findings</b></p>	<p>Pending</p>

<p><b>Final Round 1 NCR/CL/OFI 29 October 2013</b></p>	<p>Pending review of final MR.</p>
<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>The following details of the peat experts have been added to Section 5.2.3, Step 2 of the monitoring report Two peat experts were consulted on the drainage impact in the Northern Buffer zone: 1. Marcel J. Silvius Head of Programme and Strategy Wetlands &amp; Livelihoods; Wetlands &amp; Climate Wetlands International Phone: +31 318 660924 Email: marcel.silvius@wetlands.org www.wetlands.org Qualification: Degree in Biology and Tropical Soil Sciences from the State University of Utrecht and Nature Conservation from the Agricultural University of Wageningen 2. Aswin Usup, PhD Head of Research Center for peat land fire and Land Rehabilitation Palangka Raya University, Central Kalimantan, Indonesia Email: gnmas@yahoo.com Qualification: PhD Graduate School of Environmental Earth Science, Hokkaido University (S-3), Sapporo, Japan Detailed CVs of the peat experts detailing their qualifications and experience that demonstrates their position as a peat expert.</p>
<p><b>Findings</b></p>	<p>This is all listed, as requested in the monitoring report. Issue addressed.</p>

<p><b>Item Number</b></p>	<p><b>39</b></p>
<p><b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b></p>	<p>Buffer reserve should be calculated using VCS Tool for AFOLU Non-Permanence Risk Analysis and Buffer Determination.</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	<p>Rimba Raya_M22010_2013.xlsx Summary Project Emissions table_tab (column T, cell T35), and InfiniteEarth_MonitoringReportM2.docx section 5.4.5</p>
<p><b>Findings</b></p>	<p>The buffer allocation was calculated using the VCS AFOLU Non-Permanence Risk Tool V3.2 (Annex 4) The calculation of the buffer allocation is conducted on tab titled "SummaryProjectEmissionsTable", column R, within the calculation spreadsheet. However the value for the buffer allocation in the calculation spreadsheet does not match the value in the monitoring report. The calculation spreadsheet reports 1,363,935 t CO2-e, while the report shows 1,121,563 t CO2-e</p>

<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	CL: The value for the Risk Buffer allocation in the report does not match the value in the calculation spreadsheet. Please correct.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	The value for the risk buffer allocation has now been corrected and is consistent with the value in the spreadsheet.
<b>Findings</b>	Values have been changed and still do not match. The value for the buffer allocation in the calculation spreadsheet does not match the value in the monitoring report. The calculation spreadsheet reports 1,395,269 t CO2-e, while the report shows 1,152,897 t CO2-e
<b>Final Round 2 NCR/CL/OFI 20 November 2013</b>	CL: The value for the Risk Buffer allocation in the report does not match the value in the calculation spreadsheet. Please correct.
<b>Final Round 2 Response from Project Proponent November 2013</b>	During the process of the verification the risk buffer has change from the initial number. The risk buffer is now 15% for all years covered by this monitoring period. This percentage risk buffer deduction is now consistently represented through all the project documentation, including the calculator.
<b>Findings</b>	Finding Closed: The Risk Buffer allocation is: 1,526,405 t CO2-e in both the Monitoring report and calculation spreadsheet.

<b>Item Number</b>	<b>40</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	See Chapter 11.2. _Quality control (QC) and quality assurance (QA) procedures to be applied to the monitoring process.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	InfiniteEarth_MonitoringReportM2.docx section 5.4
<b>Findings</b>	QA/QC is not described in the MR.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	NCR: Please describe the Quality Assurance and Quality Control Procedures in the Monitoring Report
<b>Findings</b>	Pending

<b>Round 1 Response from Project Proponent October 2013</b>	Please refer to the revised Section 6 of the Monitoring Report and SOPs provided on 22 October 2013.
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending review of final MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Please refer to the revised Section 6 of the Monitoring Report and SOPs provided on 22 October 2013.
<b>Findings</b>	Section 6 of the MR now details the appropriate SOPs and QA/QC was followed, which was also confirmed during site visit observations. Addressed.

<b>Item Number</b>	<b>41</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	See Eq. 127, 128 and 129.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Rimba Raya_M22010_2013.xlsx Summary Project Emissions Ex-post uncertainty, and InfiniteEarth_MonitoringReportM2.docx section 5.3
<b>Findings</b>	Ex-post uncertainty tab is more difficult to follow than other calculations and should be cleaned up. It does not explicitly make uncertainty calculations for each strata as is prescribed in the methodology VM0004 - 127, and elements of this equations are given unclear names.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	NCR: 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: Calculations do not appear to be 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: 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: VM0004 -129 does not appear to be explicitly calculated, CL: 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.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending

<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	The spreadsheet has been adjusted and clearly labelled to address all the items related to this NCR, in particular the calculations have been conducted for each stratum and each column clearly labelled with the equation number. A lot of work has been done with the uncertainty tab to clarify the parameters covered in uncertainty analysis and the sources of the uncertainty. Additional comments have also been added. The Project Proponent offers to step the reviewer through the changes as this may be more efficient.
<b>Findings</b>	<p>NCR 1 (round 2): InfiniteEarth_MonitoringReportM2-revisions.docx section 5.3 states "As the uncertainty was found to be less than 10% in each year no uncertainty deduction was required." , however it appears that uncertainty was greater than 10% for both 2010 and 2011 (10% and 11% respectively, from table 25 in the monitoring report) . These uncertainty estimates exceeding 10% need to be addressed in the monitoring report and calculation spreadsheet.</p> <p>NCR 1 is not addressed. in the calculation spreadsheet (Rimba Raya_M22010_2013V2.xlsx Ex-post uncertainty tab).</p> <p>CL2 is not addressed in the calculation spreadsheet (Rimba Raya_M22010_2013V2.xlsx Ex-post uncertainty tab). <u>Calculations for VM0007-127 should be for an individual strata, and VM0007-128 should be for all strata combined. The spreadsheet shows the same values for both.</u> CL3 is not addressed in the calculation spreadsheet (Rimba Raya_M22010_2013V2.xlsx Ex-post uncertainty tab).</p> <p>CL 4 appears to be addressed in Rimba Raya_M22010_2013V2.xlsx ExpostUncertainty tab cells H3-H5.</p> <p>CL 5 is not addressed, there needs to be 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.</p>

<p><b>Final Round 2 NCR/CL/OFI 20 November 2013</b></p>	<p>NCR 1 (new for Round 2): Uncertainty is greater than 10% for both 2010 and 2011 (10% and 11% respectively, from table 25 in the monitoring report, InfiniteEarth_MonitoringReportM2-revisions.docx) . These uncertainty estimates exceeding 10% need to be accounted for in the monitoring report and calculation spreadsheet (Rimba Raya_M22010_2013V2.xlsx).</p> <p>NCR 1 (from Round 1): All of the parameters listed in the monitoring report section 5.3 Table 24 do not appear to be included in the calculation of VM0004 -127 or VM0004 -128 in the calculation spreadsheet.</p> <p>CL 2 (from 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. Although the Project Proponent makes a case they believe the result would be immaterial, that cannot be determined for sure unless the actual numbers are provided for each stratum based on the Methodology requirements.</p> <p>CL 3 (from 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.</p> <p>CL 5 (from Round 1): 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.</p>
<p><b>Final Round 2 Response from Project Proponent November 2013</b></p>	<p>NCR: The uncertainty deductions for 2010/2011 and 2011/2012 have been made in the calculation spreadsheet. These are now performed on a strata by strata basis with each individual year represented on a separate tab. In each year the uncertainty was found to be less than 10% and therefore no deduction was required. The Monitoring report has also been updated to reflect the figures in the calculator. NCR: The additional parameter was added to the Uncertainty spreadsheet and all parameters are clearly labelled in the new structured tabs for each year. CL2: Calculations of uncertainty have been re-done on a strata by strata basis and new tab for each year. CL3: The tabs have all be changed and this issues is no longer relevant due to the structural changes. CL5: Comments have been presented in the calculator to direct the reader to the data used to determine means and standard errors. Some of the data referred to are now presented in the calculator and other data are provided in the reports/spreadsheets attached to this CL. For efficiency a phone discussion to step through this complex element is offered.</p>

<p><b>Findings</b></p>	<p>NCR 1 (round 2): Uncertainty calculations appear correct, are now done per strata, and do not require a deduction as all values are below 10%, however Uncertainty yBSL,t (Total uncertainty in baseline scenario; %) does not appear to be accounted for in the calculation of VM0004-130 within the calculation spreadsheet. This calculation appears on cell Y 46 on all ExpostUncertainty tabs within Rimba Raya_M22010_2013V3.xlsx. Please discuss why this variable is not included in VM0004-130.</p> <p>NCR 1 ( round 1): Finding closed, all of the parameters now appear in calculation of VM0004 127 and 128 in the calculation spreadsheet.</p> <p>CL 2 (round 1): Finding Closed: Calculation are now made for each strata, as is prescribed by methodology VM0004 - 127.</p> <p>CL 3 (round 1): Finding Closed, these equations are now understood as references to estimates.</p> <p>CL 5 (round 1): Finding closed, references to datasets are included and are clear.</p>
<p><b>Final Round 3 NCR/CL/OFI 03 December 2013</b></p>	<p>NCR 1 (round 2): Please discuss why Uncertainty yBSL,t (Total uncertainty in baseline scenario; %) is not included in VM0004-130.</p>
<p><b>Final Round 3 Response from Project Proponent 04 December 2013</b></p>	<p>Excerpt from e-mail from PP:</p> <p>The total uncertainty listed in Equation 130 excludes the baseline uncertainty figure. The uncertainty figure reported in Project Description and the validation report as zero due to the project utilizing default values and conservative figures as is allowed by the methodology in the ex-ante calculations.</p> <p>The exclusion of the baseline leads to conservative estimation of the uncertainty which still remains below the 10% threshold for the monitoring years included in this verification.</p> <p>We accept that for transparency in the future an opportunity for improvement will be to include these parameters in future calculations.</p>
<p><b>Final Findings</b></p>	<p>Response sufficient Finding Closed: This approach was confirmed in the Validation report and follows the methodology.</p>

Item Number	42
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	See Eq. 130.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Rimba Raya_M22010_2013.xlsx, and InfiniteEarth_MonitoringReportM2.docx section 5.3
<b>Findings</b>	It is not clear where the calculation of error VM0004 – 130 in either the calculation spreadsheet or monitoring report
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	CL: Please indicate where in the calculation spreadsheet VM0004 – 130 is calculated.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Equation 130 is calculated on tab 'Ex-postUncertainty_columnC'
<b>Findings</b>	Response Sufficient, CL closed.

Item Number	43
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	The allowable uncertainty under this methodology is +/- 10% of CREDD,t at the 90% confidence level. Where this precision level is met, then no deduction should result for uncertainty.

<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Rimba Raya_M22010_2013.xlsx, and InfiniteEarth_MonitoringReportM2.docx section 5.3 table 23
<b>Findings</b>	The monitoring report states "As the uncertainty was found to be less than 10% in each year no uncertainty deduction was required." This statement may be true but a final decision will be pending response to Item 42.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending response to Item 42.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Equation 130 is calculated on tab 'Ex-postUncertainty_columnC'
<b>Findings</b>	Response Sufficient, CL closed.

<b>Item Number</b>	<b>44</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	Where uncertainty exceeds 10% of CREDD,t at the 90% confidence level then the deduction shall be equal to the amount that the uncertainty exceeds the allowable level.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Rimba Raya_M22010_2013.xlsx, and InfiniteEarth_MonitoringReportM2.docx section 5.3 table 24
<b>Findings</b>	The monitoring report states "As the uncertainty was found to be less than 10% in each year no uncertainty deduction was required." This statement may be true but a final decision will be pending response to Item 42.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending response to Item 42.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending

<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Equation 130 is calculated on tab 'Ex-postUncertainty_columnC'
<b>Findings</b>	Response Sufficient, CL closed.

<b>Item Number</b>	<b>45</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	The adjusted value for CREDD,t to account for uncertainty shall be calculated using Eq. 131.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Rimba Raya_M22010_2013.xlsx, and InfiniteEarth_MonitoringReportM2.docx
<b>Findings</b>	The monitoring report states "As the uncertainty was found to be less than 10% in each year no uncertainty deduction was required." This statement may be true but a final decision will be pending response to Item 42.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending response to Item 42.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Equation 130 is calculated on tab 'Ex-postUncertainty_columnC'
<b>Findings</b>	Response Sufficient, CL closed.

<b>Item Number</b>	<b>46</b>
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<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	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:
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Section 5.4 of the M2 Monitoring Report
<b>Findings</b>	It appears that the project intended to include this section in the Monitoring Report. However, Section 5.4 in the MR does not contain the QA/QC information. It appears this section of the report was omitted.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	NCR: Please update the Monitoring Report to include the QA/QC requirements.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending review of final MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Pending
<b>Findings</b>	QA/QC procedures for field data collection, remote sensing and data entry and analysis have been added to the monitoring report as requested in Section 6. Issue is addressed.

<b>Item Number</b>	<b>47</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	(1) collection of reliable field measurement
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Section 5.4 of the M2 Monitoring Report
<b>Findings</b>	Refer to Item number 46 above.

<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Refer to Item number 46 above.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending review of final MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Pending
<b>Findings</b>	QA/QC procedures for field data collection, remote sensing and data entry and analysis have been added to the monitoring report as requested in Section 6. Issue is addressed.

Item Number	48
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	(2) reliable collection and analysis of aerial imagery (if applicable)
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Section 5.4 of the M2 Monitoring Report
<b>Findings</b>	Refer to Item number 46 above.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Refer to Item number 46 above.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending review of final MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Pending

<b>Findings</b>	QA/QC procedures for field data collection, remote sensing and data entry and analysis have been added to the monitoring report as requested in Section 6. Issue is addressed.
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Item Number	49
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	(3) verification of methods used to collect field data
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Section 5.4 of the M2 Monitoring Report
<b>Findings</b>	Refer to Item number 46 above.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Refer to Item number 46 above.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending review of final MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Pending
<b>Findings</b>	QA/QC procedures for field data collection, remote sensing and data entry and analysis have been added to the monitoring report as requested in Section 6. Issue is addressed.

Item Number	50
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	(4) verification of data entry and analysis techniques

<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Section 5.4 of the M2 Monitoring Report
<b>Findings</b>	Refer to Item number 46 above.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Refer to Item number 46 above.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending review of final MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Pending
<b>Findings</b>	QA/QC procedures for field data collection, remote sensing and data entry and analysis have been added to the monitoring report as requested in Section 6. Issue is addressed.

<b>Item Number</b>	<b>51</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	(5) data maintenance and archiving
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Section 5.4 of the M2 Monitoring Report
<b>Findings</b>	Refer to Item number 46 above.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Refer to Item number 46 above.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending review of final MR.

<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Pending
<b>Findings</b>	QA/QC procedures for field data collection, remote sensing and data entry and analysis have been added to the monitoring report as requested in Section 6. Issue is addressed.

<b>Item Number</b>	<b>52</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	If after implementing the QA/QC plan it is found that the targeted precision level is not met, then additional field measurements need to be conducted until the targeted precision level is achieved.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Section 5.4 of the M2 Monitoring Report
<b>Findings</b>	Refer to Item number 46 above.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Refer to Item number 46 above.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending review of final MR.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Pending
<b>Findings</b>	QA/QC procedures for field data collection, remote sensing and data entry and analysis have been added to the monitoring report as requested in Section 6. Issue is addressed.

<b>Item Number</b>	<b>53</b>
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<p><b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b></p>	<p>Field-team members shall be fully aware of all procedures and the importance of collecting data as accurately as possible.</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	<p>VM0004 v1.0 and M2 Monitoring Report.</p>
<p><b>Findings</b></p>	<p>It does not appear that any field measurements were made in this monitoring period. The project was previously validated and verified. The project had a time lapse between when the original verification was started and when it was finalized. The project was having issues with acquiring the needed Rights of Use that allowed for a finalization of the first verification. It appears that the project has enabled a deviation from its monitoring plan during this time, which has resulted in only remote sensing based monitoring, with some field patrols used to complement the remote sensing aspects.</p> <p>Review of the methodology indicates that field measurements are suggested in many cases, but are not specifically required. The monitoring plan indicates time frames for these elements, however the Monitoring Report indicates that due to funding issues, the project has had to deviate from the field monitoring aspects of the Monitoring Plan. While this does represent a deviation, it does not appear that this deviation is explicitly affecting the compliance with the methodology. This element appears to be in compliance with the methodology at this time.</p>
<p><b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b></p>	<p>NCR: Please be specific as to what elements were deviations to the Monitoring Plan.</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Round 1 Response from Project Proponent October 2013</b></p>	<p>Section 2.2 of the monitoring plan has been expanded to more clearly describe the when and why aspects of the deviations to the projects approved monitoring plan. This also includes additional clarification presented in the Monitoring Component Tables 4 and 5 in the monitoring report. The updated text in the monitoring report is attached to this email.</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Final Round 1 NCR/CL/OFI 29 October 2013</b></p>	<p>Pending review of final MR.</p>
<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>Section 2.2 of the monitoring plan has been expanded to more clearly describe the when and why aspects of the deviations to the projects approved monitoring plan. This also includes additional clarification presented in the Monitoring Component Tables 4 and 5 in the monitoring report. The updated text in the monitoring report is attached to this email.</p>

<b>Findings</b>	The monitoring report has updated language regarding the deviations made to the ground monitoring aspects of the project monitoring plan. Verifiers agree that these deviations do not affect the compliance with the methodology. Issue is addressed.
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Item Number	54
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	A subset of image plots should be selected randomly and interpreted independently by at least one different analyst.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MR: Section 4.1.3.3
<b>Findings</b>	It is unclear who performed the independent assessment.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	NCR: Who conducted the independent interpretation of the randomly selected strata to check the Landsat classification? Please provide accuracy assessment (annex 5)
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	The accuracy assessment of the land cover classification was carried out by Sandra Enghart who has not worked on the land cover classification of the satellite images. The error matrices are shown in Annex 5. The CVs of the personnel who conducted the Land Cover Assessment are attached this NCR.
<b>Findings</b>	Conformance was confirmed for error matrices and client feedback noting independent review and interpretation of image subset is sufficient to provide reasonable assurance to close this NCR.

Item Number	55
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<p><b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b></p>	<p>Persons involved in the field measurement work should be fully trained in the field data collection and data analyses. Standard Operating Procedures (SOPs) for each step of the imagery collection and analysis shall be developed and adhered to at all times. These SOPs should detail all phases of the field measurements and contain provisions for documentation for verification purposes, so that measurements are comparable over time and can be checked and repeated in a consistent fashion.</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	
<p><b>Findings</b></p>	<p>It is unclear if this criterion was adhered to.</p>
<p><b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b></p>	<p>NCR: Please provide evidence that field going personnel adhered to SOPs for logging gap detection, fire measurements, and any other field activities.</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Round 1 Response from Project Proponent October 2013</b></p>	<p>Pending</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Final Round 1 NCR/CL/OFI 29 October 2013</b></p>	<p>Pending</p>
<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>The field reports have been edited to include details of the Standard Operating procedures followed as well as a statement to say that the field team were trained in the SOP prior to dispatch to the field. In reality these same OFI staff were directly involved with the development of the field protocols and SOPs and in all cases a senior member of the OFI field team leads the fieldwork crew on every field trip. The field manager, Robert Yappi, who has been involved with the Project since its inception ensures that all members of the team are trained in the requirements. Translation of the importance of VCS requirements is facilitated by Dr Carly Green (Project Technical Consultant) and Juliarta Ottay (Project Manager).</p>
<p><b>Findings</b></p>	<p>NCR eliminated due to lack of ground truthing in monitoring period</p>
<p><b>Item Number</b></p>	<p><b>56</b></p>

<p><b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b></p>	<p>Virtual measurements shall be checked by a qualified person to correct any errors in techniques</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	
<p><b>Findings</b></p>	<p>It is unclear who the qualified person was to performed the assessment.</p>
<p><b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b></p>	<p>CL: Who is the qualified person to carry this out?</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Round 1 Response from Project Proponent October 2013</b></p>	<p>Pending</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Final Round 1 NCR/CL/OFI 29 October 2013</b></p>	<p>Pending</p>
<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>Remote Sensing Solutions (see <a href="http://www.rssgmbh.de/">www.rssgmbh.de/</a>). The team has extensive experience in remote sensing in Indonesia and has published many papers in peer reviewed literature of their work. The CVs of Sandra Englhart and Peter Navratil who both were involved in the remote sensing analysis have been provided in response to NCR 54 and are also relevant to this NCR response.</p>
<p><b>Findings</b></p>	<p>Response from client is sufficient to satisfy this requirement and gives the verifier the necessary assurance of qualifications.</p>

Item Number	57
<p><b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b></p>	<p>A document that shows that these steps have been followed shall be presented as a part of the project documents.</p>

<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	
<b>Findings</b>	A document indicating that the previously mentioned steps have been followed has been provided by client
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	CL: Please describe processes to ensure reliability in remote sensing analysis. Although some of this discussion is interspersed throughout the MR, can you provide a more succinct summary?
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	See section 4.1.3.2. (page 56) There is a list of the necessary processing steps which were carried out for the land cover classification
<b>Findings</b>	A document indicating that the previously mentioned steps have been followed has been provided by client.

Item Number	58
<p><b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b></p>	<p>To verify that plots have been installed and the measurements taken correctly, 10-20% of plots shall be randomly selected and re-measured independently.</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	
<p><b>Findings</b></p>	<p>The verifier is unable to verify plot installation and correct measurement. Shapefile with points used to verify accuracy cover classification do not appear to have been sent in last round of files from client.</p>
<p><b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b></p>	<p>NCR: Please provide necessary geospatial data to verify effective measurements, per our call on 28 October 2013.</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Round 1 Response from Project Proponent October 2013</b></p>	<p>Pending</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Final Round 1 NCR/CL/OFI 29 October 2013</b></p>	<p>Pending</p>
<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>The tracklog and Photos taken in accessible areas were used for the accuracy assessment of the LC map. Please find attached the shape file of those points used. The approach was focused on areas which were either at the border of two LC classes and it was thus not clear whether the sample was localized in the one or other class (due to GPS and Landsat geolocation accuracy), or those where the field mapped information disagreed with the info we saw in the photos.</p>
<p><b>Findings</b></p>	<p>Shapefile with points for 10-20% random selection and re-measurement do not appear to have been sent, but we did receive validation file from PP.</p>
<p><b>Final Round 2 NCR/CL/OFI 20 November 2013</b></p>	<p>NCR: Please provide shape file of points used for 10-20% random selection and re-measurement, as verifier did not locate it with new documents.</p>
<p><b>Final Round 2 Response from Project Proponent November 2013</b></p>	<p>File attached to the response to this NCR.</p>

<b>Findings</b>	Validation file from client confirms accuracy assessment results from initial biomass field plots (none taken in second monitoring period). Verifiers performed a random interpretation of 15 points using Google Earth to ocularly identify land cover classifications.
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Item Number	59
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	To minimize the possible errors in this process, the entry of both field data and laboratory data shall be reviewed using expert judgment and, where necessary, comparison with independent data to ensure that the data are realistic.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Section 7.1-7.3 of MR
<b>Findings</b>	This was not observed in MR.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	CL: Please describe where the MR explains "Verification of data entry and analysis."
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Verification of data entry and analysis was conducted by people independent to the activities. The approach and the details of personnel /companies have been added to Section 7.2 and 7.3 of the Monitoring Report
<b>Findings</b>	This element has been added to the monitoring report in section 7.1- 7.3 as part of the QA/QC procedures. Issue addressed.

Item Number	60
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	Because of the long-term nature of the CDM-AR project activity, data shall be archived and maintained safely. Data archiving shall take both electronic and paper forms, and copies of all data shall be provided to each project participant. All electronic data and reports shall also be copied on durable media such as CDs and copies of the CDs are stored in multiple locations.

<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Section 7.1-7.3 of MR
<b>Findings</b>	This was not observed in MR.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	CL: Please describe where the MR explains "Data maintenance and archiving."
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Section 6 and Section 7.4 of the Monitoring Report have been updated to provide details of the data maintenance and archiving conducted by the Project.
<b>Findings</b>	This has been added to the monitoring report in sufficient detail. Issue is addressed.

<b>Item Number</b>	<b>61</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	Ongoing enforcement to prevent encroachment by outside actors is required to protect more than 50% of stocks on which GHG credits have previously been issued.
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Project Risk Report (Short) and Tool

<p><b>Findings</b></p>	<p>Ongoing enforcement refers to the need to protect carbon stocks in the project area from encroachment by outside actors, for example, where a REDD project faces risk from outside actors entering the project area for the purposes of illegal logging.</p> <p>It appears that this project has experienced several encroachments into the project area by the actors of deforestation. One of the most significant of which is the continued presence of human caused fire starts in the project area. This appears to be carelessness as well as possibly due to encouragement by the palm oil companies. While this can not be confirmed, this element is deemed to be a significant threat to the project area that warrants further explanation, mitigation, protection and possibly an adjustment to this score for the current verification period.</p> <p>Upon further discussions with the project proponent, it appears that this item will be scored a 2 rather than a 0, in reflection of the fact that ongoing enforcement is needed at this time in the projects life. It is recognized that this element may change in future years as the project becomes more established.</p>
<p><b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b></p>	<p>NCR: Please justify why this risk score is not applicable to the project when it appears that the project does experience the need for ongoing protection of carbon stocks.</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Round 1 Response from Project Proponent October 2013</b></p>	<p>The ongoing extent of the carbon stocks in the project area require protection from 2 outside actors;</p> <ol style="list-style-type: none"> <li>1. the identified agent of deforestation, PT BEST poses a threat at this verification period at the northern boundary. This has been mitigated through dialogue with the agent through active blocking of drains and replanting with native species in the incursion zone as well as formal recognition by the district forest authority of a boundary breach into Rimba Raya concession and initiation of a legal response. The Project believes that it will be successful in the mitigation of the risk from future breached by PT BEST due to the limited extent (distance) of the northern boundary shared by the Project and PT BEST.</li> <li>2. Local communities accidentally (and intentionally) burning inside the carbon accounting boundary. This is a particular issue along the Seruyan River side of the Project Boundary and the southern most end of the project area. The Project recognizes that fire is a more substantial ongoing risk and requires more intensive engagement with the communities. Fire training and planning (see attached reports of work already done in this area that will be built on in from 2013), increased access to sustainable livelihoods through the rehabilitation of degraded areas, combined with incentives to reduce burn activity such as through the Health and Harmony program will add to reducing this risk over time.</li> </ol>

	The Project accepts that the Risk rating should be 2 rather than 0 to reflect the risk from fire at this current time in the Project implementation.
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	<p>The ongoing extent of the carbon stocks in the project area require protection from 2 outside actors;</p> <p>1. the identified agent of deforestation, PT BEST poses a threat at t his verification period at the northern boundary. This has been mitigated through dialogue with the agent through active blocking of drains and replanting with native species in the incursion zone as well as formal recognition by the district forest authority of a boundary breach into Rimba Raya concession and initiation of a legal response. The Project believes that it will be successful in the mitigation of the risk from future breached by PT BEST due to the limited extent (distance) of the northern boundary shared by the Project and PT BEST.</p> <p>2. Local communities accidentally (and intentionally) burning inside the carbon accounting boundary. This is a particular issue along the Seruyan River side of the Project Boundary and the southern most end of the project area. The Project recognizes that fire is a more substantial ongoing risk and requires more intensive engagement with the communities. Fire training and planning (see attached reports of work already done in this area that will be built on in from 2013), increased access to sustainable livelihoods through the rehabilitation of degraded areas, combined with incentives to reduce burn activity such as through the Health and Harmony program will add to reducing this risk over time.</p> <p>The Project accepts that the Risk rating should be 2 rather than 0 to reflect the risk from fire at this current time in the Project implementation.</p>
<b>Findings</b>	PP opted to take the more conservative risk score here. Issue addressed.

<b>Item Number</b>	<b>62</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	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
<b>Evidence Used to Assess (Location in PD/MR or Supporting</b>	Project Risk Report (Short) and Tool

Documents)	
Findings	<p>The project documents state "The alternative land use scenario for the Rimba Raya Project Area is conversion to Palm Oil. Palm oil produces high net revenues and financial returns for the palm oil company and the Government through royalties.</p> <p>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).</p> <p>The opportunity cost of land-use change is defined as the amount of financial gain per ton of carbon dioxide equivalent (CO<sub>2</sub>-e) emitted from a particular change in land use, such as removing a forest and replacing it with an oil palm plantation.</p> <p>Based on two recent studies of on the opportunity cost of implementing REDD+ projects over palm oil found that the international price of palm oil is the main driver of NPV (Net Present Value). A recent study (Heli et al, 2013) found that the profitability gap (the difference between NPV of palm oil and carbon) ranged between 150.6% and 237.6%.</p> <p>Therefore the Project applied the highest opportunity cost rating possible in the risk assessment.</p> <p>If there is a high opportunity cost, areas may be at a high risk of conversion. The methodology handles this risk through the requirement to maintain a significant buffer area around the carbon accounting area and to track, account for and report emissions from deforestation as well as activity shifting leakage. "</p> <p>Evidence: Heli Lu and Guifang Liu (2013) Distributed land use modelling and sensitivity analysis for REDD+. Land Use Policy. 33 pp. 54-60</p> <p>The AFOLU Non-Permanence Risk Tool v3.2 states "The opportunity cost analysis shall include a net present value (NPV) analysis, covering the project crediting period, of such alternatives as compared to the project, taking into consideration a conservative estimate of revenue from GHG credit sales and other project revenue streams, and potential price fluctuations of commodities impacted by the project. The financial discount rates used shall be based on published sources and represent the appropriate risk for the relevant land use scenario. Estimates of prices for GHG credit sales shall be based on published sources such as market intelligence reports. The analysis shall be undertaken in a transparent manner and shall provide all relevant assumptions, parameters, and data sources such that a reader may reproduce the analysis and determine the same results."</p> <p>The reference material was reviewed and it is clear that the palm oil plantation would be a much more profitable venture. the AFOLU Risk Tool specifies what needs to be included in the analysis. The project documents do not appear to include this analysis as stated in the Risk tool.</p>

<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	NCR: Please either indicate where all the elements of the NPV analysis as stated in the AFOLU Non-Permanence Risk Tool, v3.2 can be found in the reference material, or please complete the NPV analysis so that it covers the project crediting period, conservative revenue from GHG sales, potential price fluctuations, appropriate financial discount rates. Please be sure to base all assumptions on published sources.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	The NPV analysis was conducted again for the Project and all elements are listed in the Non-Permanence Risk Tool. Additional clarifying text and a detailed spreadsheet have been provided which lists the requirements of the NPV are now presented in the Non-Permanence Risk Report.
<b>Findings</b>	NPV calculations appear to take into consideration all the needed aspects, including the time lag between establishment and productivity for the palm oil. NPV discount rate is .05 and 8%inflation is also included. NPV goes out for the initial 30 year project period. The results of the NPV analysis determined that the NPV of palm oil production was more than 200% more than the Project Activity. The project is taking the highest score possible for this element. Issue is addressed.

<b>Item Number</b>	<b>63</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	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
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	Project Risk Report (Short) and Tool

<p><b>Findings</b></p>	<p>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).</p> <p>Evidence: Stakeholder agreements/decrees (including maps) have been provided to the verifier</p> <p>These agreements demonstrate that there are no outstanding disputes over land tenure, ownership or access/user rights. It should be noted here that the breach of the northern boundary of the Rimba Raya concession occurred immediately prior to the finalization of the agreements in early 2013. This boundary breach was seen as an opportunistic event by the agent of deforestation. The agreements are now finalized 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.</p> <p>Agreement document reviewed by verifiers however it is not clear if the agreement presented is evidence of meeting the requirements of this risk score.</p>
<p><b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b></p>	<p>NCR: Please provide specific evidence that the agreements signed for the project area provide the needed protections over the length of the crediting period.</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Round 1 Response from Project Proponent October 2013</b></p>	<p>Pending</p>
<p><b>Findings</b></p>	<p>Pending</p>
<p><b>Final Round 1 NCR/CL/OFI 29 October 2013</b></p>	<p>Pending</p>
<p><b>Final Round 1 Response from Project Proponent 13 November 2013</b></p>	<p>The following explanatory text has been added to Section 1.4 of the Risk Report:</p> <p>After more than two years of efforts, Infinite Earth has secured the Right of Use to Project Area which is documented in Project Working Area Map (Figure 1) authorized by the Forestry Minister and signed by the Director General of the Planning Department, and the following legal documents:</p> <ul style="list-style-type: none"> <li>• Government Decree Number SK 146</li> <li>• Collaborative Agreement (PT RRC and Tanjung Putting National Park)</li> <li>• Moue BEST-RRC_Land-authority Transfer.</li> </ul> <p>Decree number SK 146, grants concession of the project area comprising 36, 331 hectares where right of use is specifically stipulated in the third stipulation (subsection 1), which states “(1) Conduct activities and acquire benefits from the results of its business in accordance with this license.”</p> <p>The specifics of the license are spelled out within the decree and are defined by the allowable forest management activities (IUPHHK-RE – forest ecosystem restoration). Additionally the Collaborative Agreement between Tanjung Putting National Park and PT Rimba Raya Conservation includes verbiage defining the carbon rights, as well as its connection to government decree number SK 146. Article 1 (section 10) states “Full responsibility to fund the operation and conservation areas (including fire protection) will be borne by PT Rimba Raya Conservation,</p>

	<p>where PT Rimba Raya Conservation project will last for a period of 30 years (+30 years) and all the emission reductions due to conservation in this area will be recognized as rights of PT Rimba Raya Conservation.” In addition, article 1 (section 8 states “Creating buffer zone for Tanjung Puting National Park as set in the Technical proposal IUPHHK-RE PT. PRC which delivered on October 20, 2009 at the Directorate General of Forestry Production.”</p> <p>The final parcels of the right of use areas identified in the working area map approved by the Director General of the Planning Department were attained by the project through an agreement between PT Rimba Raya Conservation and PT Best. Three main documents are relevant to these lands; Moue BEST-RRC_Land-authority Transfer, government Decree number SK 716, and government decree number SK 731. As concession of the final two parcels of the project area was initially granted to holding companies of PT Bes (PT Wahana Agrotama Makmur Perkasa (2,394 hectares) and PT Rimba Sawit Utama Planindo (6, 512 hectares,) the concession holder created a contract giving control of these lands to PT Rimba Raya Conservation. The transfer of these rights to PT Rimba Raya has the approval of the Forestry Minister and the Director General of Planning as noted by the signed working area map.</p> <p>Therefore the Project has all necessary documents in place that demonstrate user rights and the support of the Forest Authority and Director General of Planning and as part of the agreement is legally required to protect the areas defined in the working area map. The circa 8,800 hectares currently under MOU with PT BEST are currently undergoing the formal process of conversion to IUPHHK-RE – forest ecosystem restoration, however the working area map represents the official project and government position on the long term protection of this area.</p> <p>Mitigation: The Project is protected by legally binding commitment to continue management practices that protect the credited carbon stocks over the length of the Project crediting period.</p>
<p><b>Findings</b></p>	<p>Pease refer to detailed NCR.</p>

<p><b>Final Round 2 NCR/CL/OFI 20 November 2013</b></p>	<p>ESI recognizes that the project is continuing to secure the government-sanctioned legally binding decrees or agreements needed to secure the entire project area; however, it still does not appear that the MOU with PT Best, nor the working area map provides the evidence required under the AFOLU Risk Tool that is required to attain the mitigation credit. This is based on ESI's experience with other projects and feedback with VCS.</p> <p>The language from the AFOLU Risk Tool states: "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."</p> <p>The signature on the map without any supporting mandates from the Indonesian Government does not satisfy "legal enforceability."</p> <p>Additionally the MOU states: "The purposes of this MOU is to give interim authority to PT. RRC to develop models on sustainable rural development, community-based forest restoration and peat-swamp forest conservation, while waiting for the formal (legal) transfer of land-use concession license (IUPHHK-RE) from PT Best to PT Rimba Raya Conservation."</p> <p>Our read of the MOU indicates that the formal (Legal) transfer of land-use concession is not completed, which we already understood, however this does not lend evidence that this is a legal agreement. If there is written communications from the Indonesian Government that states that this working area map (and MOU) represents the legally enforceable binding agreement, or some evidence that the MOU was recorded with some legal entity, then that may suffice. It appears at this time that this agreement is recognized by the Indonesian Government by their signature on the map; however, the MOU states that the agreement can be terminated by either party, which does not lend credence to it being legally enforceable.</p> <p>With the current information presented, ESI does not accept that the ENTIRE project area is under a legally binding agreement. Until sufficient evidence is presented in support of this statement, ESI cannot accept the issuance of the mitigation credit in the AFOLU Risk Tool.</p>
<p><b>Final Round 2 Response from Project Proponent November 2013</b></p>	<p>Thanks for your clear email in relation to the risk mitigation being claimed.</p> <p>In response, given the deadline the project is working to we have selected to take Option 2: Change the mitigation credit to 0.</p> <p>As such I attach the revised Risk Calculator, Risk Report and the Project Calculator with the adjustments made.</p>
<p><b>Findings</b></p>	<p>The necessary adjustments were made to the risk tool calculator to remove this mitigation. Addressed.</p>

<p><b>Item Number</b></p>	<p><b>64</b></p>
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<p><b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b></p>	<p>Less than 20 percent of households living within 20 km of the project boundary outside the project area, and who are reliant on the project area, have been consulted</p>
<p><b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b></p>	<p>Project Risk Report (Short) and Tool</p>
<p><b>Findings</b></p>	<p>Project documents state "InfiniteEARTH has focused intensively on community engagement in the design and approach to community development activities in the Rimba Raya area to achieve validation against the Climate, Community and Biodiversity Standard.</p> <p>There are no established communities within the Project Boundaries.</p> <p>At least 20% of the communities who live within 20km of the Project boundaries and who rely on resources within the Project Area (such as fishing and subsistence agriculture) were consulted throughout the CCB project development stage.</p> <p>Evidence: Certification against the Climate, Community &amp; Biodiversity Standards (CCBS)"</p> <p>AFOLU Non Permanence Risk Tool states "Households can be determined as consulted and involved in participatory planning where there have been direct meetings and planning with associations or community groups that are legally recognized to represent the households. "</p> <p>ESI understands that the project claims to have consulted with at least 20% of the communities living within 20km of the project boundaries, however no evidence is presented that would provide evidence of this claim.</p>
<p><b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b></p>	<p>NCR: Please provide evidence of the consultations and meetings with more than 20% of the communities living within 20 km of the project boundaries. Please include a listing of the communities within the 20km boundary and please present evidence of these meetings in the form of dates, PRA data, attendance lists, pictures and any other evidence that will allow verifiers a reasonable assurance that this criteria was met.</p>
<p><b>Findings</b></p>	<p>Pending</p>

<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	Pending
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	<p>The following text has been added to Section 2.2 of the Risk report. According to the official District desa (village) map (Figure 1) there are 22 officially named villages within the 20km buffer of the Project Carbon Accounting Area.</p> <p>Fourteen (14) of these villages are part of the Project benefit sharing commitments. The Project has conducted extensive community consultation within these villages since 2009 (see list of consultations attached) lead by World Education.</p> <p>Population statistics within the villages reported by the Seruyan District Population Census 2012 are presented in Table 1.</p> <p>Table 1: Village Population Statistics within 20km buffer of Project Area. (Shaded villages in direct Project Consultation Program)</p> <p>According to the Seruyan District population data the population of the 14 villages, which are the focus of the targeted community consultation conducted by World Education, was 10,369. This equates to 24% of the population with a 20km radius of the Carbon Accounting Area have been consulted which exceeds the required 20% for this Community Engagement Risk Criteria.</p>
<b>Findings</b>	<p>The information presented in the Risk Report shows that the project has consulted at least 20% of the communities surrounding the project area within a 20km radius. The project goes on to evaluate the population of those villages and still concludes that more than 20% of the residents in the area have also been consulted. Further evidence was gathered indirectly during the site visit, where it was found that many people encountered in the surrounding areas were quite familiar with the project. Since the Risk Tool clarifies that this metric is measured on the number of communities and not individuals, this issue is addressed.</p>

<b>Item Number</b>	<b>65</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	<ul style="list-style-type: none"> <li>•Number and location of logging gaps by date, location, biomass lost or affected, and the preventative or curative measures, if any implemented</li> </ul>
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MR Section 5

<b>Findings</b>	3 logging gaps observed in GIS throughout project area, 847 ha total for 2011-2013 (unchanged year to year). No preventative or curative measures noted in MR because logging gaps assumed long established. NOTE: Logging gap 2 is actually 264.11 ha and is noted in Rimba Raya_M22010_2013.xlsx as 254.11.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending further review.
<b>Findings</b>	Pending
<b>Round 1 Response from Project Proponent October 2013</b>	Pending
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	NCR: Logging gap 2 is actually 264.11 ha but is noted in Rimba Raya_M22010_2013.xlsx as 254.11 ha, resulting in slightly higher Co2 emissions. Please address.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	The typo in the spreadsheet was corrected for shrubland. The value was corrected to 264.11 as determined by the verifier. This has resulted in an immaterial impact to the calculated net position of the Project.
<b>Findings</b>	The typo for shrubland class was corrected in MR and carbon calc spreadsheet  Equation 107 has been recalculated for correct logging gap 2 size and checked as correct in summary MonitoringEmissions tab of Rimba Raya_M22010_2013V2.xlsx.

<b>Item Number</b>	<b>66</b>
<b>Approved VCS Methodology VM0004 Version 1.0, Methodology for Conservation Projects that Avoid Planned Land Use Conversion in Peat Swamp Forests, Sectoral Scope 14</b>	Improved data shall be applied if and when these data become available. After a drainage depth is defined, estimate average CO2 emissions per area of drained peat (Eq. 107 & 108).
<b>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</b>	MR: Table 18 and M22010_2013.xlsx calculator
<b>Findings</b>	Checked calculations in carbon calculator spreadsheet and they are correct. EMJ 10/29/2013: See Section 15b NCR  The typo for shrubland class was corrected in MR and carbon calc spreadsheet.
<b>Preliminary Round 1 NCR/CL/OFI 10 October 2013</b>	Pending
<b>Findings</b>	Pending

<b>Round 1 Response from Project Proponent October 2013</b>	NCR: Pending Section 15b item
<b>Findings</b>	Pending
<b>Final Round 1 NCR/CL/OFI 29 October 2013</b>	NCR: Equation 107 will need to be recalculated for correct logging gap 2 size, pending #65 (Row 53) above.
<b>Final Round 1 Response from Project Proponent 13 November 2013</b>	Equation 107 was recalculated on an individual stratum basis as required by the methodology. This equation also took into consideration the correction for the area of shrubland (see response to NCR65).
<b>Findings</b>	Equation 107 has been recalculated for correct logging gap 2 size and checked as correct in summary MonitoringEmissions tab of Rimba Raya_M22010_2013V2.xlsx. Addressed.