Lessons learned from REDD+ VCS/CCBA Validation: Seima Protection Forest REDD+ demonstration site Mondulkiri and Kratie Provinces, Cambodia

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Cambodia REDD+ Programme

Disclaimer

This information brief was prepared by **Alex Diment**, **Jeff Silverman** and **Donal Yeang** the Wildlife Conservation Society (WCS)-Cambodia Programme, drawing on their experiences in developing and implementing the Seima Protection REDD+ Project under voluntary carbon market. The work of producing the brief was funded by UNDP under the UN-REDD Programme. However, the views and recommendations reflected in the brief are not necessarily those of the Cambodia REDD+ Taskforce, the Forestry Administration, the General Directorate for Administration of Nature Conservation and Protection (Ministry of Environment), UNDP or the UN-REDD Programme.

Contents

1. Background

The Forestry Administration is developing a site-based REDD project in the Core Area of the Seima Protection Forest. It is a designated national REDD demonstration site. REDD project development is well advanced with validation of the project design currently on-going and expected to be completed in 2014. This report describes the lessons learned through experiences with the development and implementation of the Seima REDD+ Project. Specifically, it identifies lessons from the VCS and CCBA combined Validation process that is currently underway.

WCS has been providing technical assistance to the FA to develop a site-based carbon offset project under the Reduced Emissions through Avoided Deforestation and Degradation (REDD) framework since 2008. Credits will be generated in the Core Area of the Seima Protection Forest, where these two organizations have cooperated on a long-term biodiversity conservation project since 2000.

The Seima Protection Forest is designated as a national REDD demonstration site. The Project Document (PD) was submitted to the FA for approval in 2013, and then submitted officially for validation against the two leading voluntary market standards, the Verified Carbon Standard (VCS), which focuses on quantifying emission reductions, and the Climate, Community and Biodiversity (CCB) Standard, which focuses on assuring social and environmental co-benefits. Conservative projections suggest the site can generate significant emissions reductions each year beyond baseline levels. However the process requires that these emissions reductions are validated and verified. There are substantial co-benefits expected as the site has high biodiversity and livelihood values. CCB requires that these positive impacts be both predicted in advance and demonstrated in practice through monitoring. These co-benefits also require audit to demonstrate compliance with the standards. This brief is about the lessons learned from the process of validation against both these standards, through it is being applied in the Seima Protection Forest demonstration site REDD project.

2. The Standards

The concept of carbon credits is somewhat complex: Carbon Dioxide is an intangible commodity, and in the case of REDD, an invisible gas which is *not* emitted, but rather stored in trees and soil. This makes the international trade in them difficult, and complex and strict application of standards is required to ensure that emissions are legitimate. Audit of these standards is also a vital component to ensure market confidence. The leading standard for the carbon market is the Verified Carbon Standard (VCS). To ensure that co-benefits from REDD projects are genuine, additional standards have been developed; the leading standards in this case are those developed by the Climate, Community and Biodiversity Alliance. (CCBA). These two standards are summarized below.

2.1. The Verified Carbon Standard (VCS)

VCS is the world's most widely used voluntary greenhouse gas (GHG) reduction certification program. Since 2008, more than 1000 registered projects have collectively registered more than 130 million tons of verified emissions reductions.

Under VCS, projects are issued unique carbon credits known as Verified Carbon Units or VCUs. Each VCU represents a reduction or removal of one ton of carbon dioxide equivalent (CO_2e). These VCUs can be registered with VCS (or other registries) for issuing and transparently tracking each Verified Carbon Unit (VCU).

In recent years, the Verified Carbon Standard has become the world's leading voluntary greenhouse gas program.

The REDD methodology under VCS was developed in 2010. It provides a set of modules for various components of a methodology for reducing emissions from deforestation and forest degradation (REDD). The standards modules, when used together, quantify GHG emission reductions and removals from avoiding unplanned and planned deforestation and forest degradation. This methodology is applicable to forest lands that would be deforested or degraded in the absence of the project activity. The methodology includes a module for activities to reduce emissions from forest degradation caused by extraction of timber.

2.2. The Climate, Community and Biodiversity Alliance standards (CCB)

The CCBA is a unique partnership of leading international NGOs that was founded in 2003 with a mission to stimulate and promote land management activities that credibly mitigate global climate change, improve the well-being and reduce the poverty of local communities, and conserve biodiversity. The CCBA brings together diverse stakeholders through a transparent and inclusive participatory process to develop standards that stimulate, identify and promote high quality multiple-benefit land management activities. The CCBA has been supported by Advising Institutions and CCB Standards donors. The Advising Institutions have provided technical input for the development and revision of the CCB Standards. The CCB Standards donors provided financial support for the development of the CCB Standards.

The Wildlife Conservation Society (WCS) is a member of the CCBA partnership.

The Climate, Community and Biodiversity Standards (CCB Standards) evaluate land management projects from the early stages of development through implementation. The CCB Standards foster the integration of best-practice and multiple-benefit approaches into project design and implementation. The CCB Standards:

- Identify projects that simultaneously address climate change, support local communities and smallholders, and conserve biodiversity.
- Promote excellence and innovation in project design and implementation.
- Mitigate risk for investors and offset buyers and increase funding opportunities for project developers.

The CCB Standards identify land management projects that deliver net positive benefits for climate change mitigation, for local communities and for biodiversity. The CCB Standards can be applied to any land management project, including projects that reduce greenhouse gas emissions from deforestation and forest degradation or from avoided degradation of other ecosystems, and projects that remove carbon dioxide by sequestering carbon (e.g., reforestation, afforestation, revegetation, forest restoration, agroforestry and sustainable agriculture) or other land management, from design through implementation and monitoring.

Demonstrating compliance with the CCB Standards

Compliance with the CCB standards must be demonstrated through a two-step process:

- **Validation** demonstrates good project design to generate significant climate, community and biodiversity benefits. Successful CCB Validation can help build support for the project among stakeholders and investors.
- **Verification** is a rigorous independent endorsement of the quality of project implementation and the delivery of multiple benefits. Successful CCB Verification enables the addition of a '**CCB label**' to verified emissions reductions units such as VCUs. The CCB Standards used alone do not lead to delivery of quantified emissions reductions certificates so they should be used in combination with a carbon accounting standard (e.g. CDM, VCS).

Use of the CCB Standards requires that independent, approved auditors determine conformance with the CCB Standards.

Auditors available for Validation

VCS
VCS is a broad Carbon Standard, relevant across a wide range of sectors. There around 40 Validation/Verification Bodies (VVBs) in all these sectors, of which 14 are relevant to the Forestry sector.
(http://www.v-c-s.org/verification-validation/find-vvb?keys=&field_sectoral_scope_tid=14)

CCBA
As of 21 April 2014, there are 22 approved auditors for the CCBA standards (https://s3.amazonaws.com/CCBA/Approved_CCBS_Auditors.pdf)
Though some of these are separately registered auditors within the same broad group of company. Only 9 of these companies are also accredited to audit VCS.

The Process of Validation

A number of steps are required, before a project design is considered Validated:

- Identifying and contracting a registered auditor
- Pre-validation
- Validation (including field-visit)
- Findings issuance

- Corrective Actions (can include corrective action plan)
- Draft Validation report, with internal review
- Issuance of Validation report, and Validation Representation.

Required timing of validation

VCS states:

> AFOLU [Agriculture, Forestry and Other Land Use] projects completing validation on or after 8 March 2013 shall complete validation within five years of the project start date.

CCBA rules state:

> The CCBA must receive the final CCB Validation Report and the CCB Validation Statement within one year of the initiation of the project's CCBA public comment period. If the Final CCB Validation Report is not issued by this date, then the project must reinitiate the validation process, including a new public comment period. The auditor must determine whether a new site visit is needed.

3. The Experiences with the Validation process in the Seima Protection Forest REDD project

The Seima REDD project has been proceeding to the following timeline:

2008, May: REDD+ Feasibility Study is completed
2009, September: Seima Protection Forest is declared by Sub-decree
2010, January 1: Project "Start Date"
2009-11: Carbon plot measurements are ongoing
2012: FPIC process (completed Jan 2013)
2013, March, final draft Project Design document presented to FA
2013, August, Project Design document accepted by FA
2013, August, Pre-Validation commences
2013, November, Validation field visit
2014, January, Validation findings are presented
2014, May; Corrective Action Plan agreed with FA
2014, June – (ongoing) Corrective Action Plan being implemented.

The Validation Company: SCS

The validator selected for the Validation Audit for the Seima REDD Project Design document was Scientific Certification Services. SCS verified the Oddar Meanchey Project's 700,000 tonnes of avoided greenhouse gas (GHG) emissions for the 2008 - 2011 time period, registered to the VCS. This Cambodia REDD+ project was the first in the world to earn the "Triple Gold" distinction under the Climate, Community and Biodiversity (CCB) Standard. The Oddar Meanchey project is also a national REDD demonstration site.

The SCS Audit Team

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

For the field-visit component, two other assistants/translators were identified;

Assistant/ Translator: So Malay.
Ms. Malay has a diploma in French Language and a Batchelor in Business Administration from Build Bright University in Siem Reap. She has many year's experience with translation for the University of Sydney's Archeological program at the Angkor temples. Ms. Malay was involved as a translator with the Oddor Meanchey Project verification.

A Bunong-language translator was also hired for the period of the field visit: Mr. Bay Ngork is a field officer with the Indigenous Community Support Organisation, based in Sen Monorom, Mondulkiri, and has some prior experience translating from Bunong to Khmer, and also some English language skills.

SCS circulated the CVs of Ms. So Malay and Mr. Bay Ngork in advance of the visit, to ensure that there was no potential for conflict of interest.

Pre-validation scope of work

The scope of the pre-validation encompassed desk review activities of the VCS project description for the Seima Protection Forest Project. VCS Assessment activities included:

- Assessment of the project description against the assessment criteria;
- Assessment of data accuracy and any assumptions made in the manipulation of data;
- Evaluation of monitoring systems;
- Assessment of the quantification of GHG emission reductions and removals;
- Assessment of the risk analysis and buffer determination;
- Evaluation of conformance of project activities with the assessment criteria.

Validation scope of work

The scope of the validation visit encompassed a desk review and also site visit activities

of the VCS project description. VCS Assessment activities included:

- Assessment of the project description against the assessment criteria;
- Assessment of data accuracy and any assumptions made in the manipulation of data;
- Evaluation of monitoring systems;
- Assessment of the quantification of GHG emission reductions and removals;
- Assessment of the risk analysis and buffer determination;
- Evaluation of conformance of project activities with the assessment criteria.

The Field visits

The Agenda for the main field visit is attached as Appendix 1. There were some concerns over the timing, due to the potential impending visit of Typhoon Haiyan. However, the Typhoon altered its course in the day proceeding the field visit, and fortunately, the visit was not affected by the adverse weather.

During the validation field visit, the auditor is not permitted to give any information which might lead the proponent to identify ways to pass the particular standard. Responses to questions were often completely un-enlightening, as the auditor and his team endeavored to follow the rules and not provide any information about what approach might be needed to pass. This occasionally led to some frustrating exchanges. The community audit team visiting the villages were especially diligent about following this, and hardly spoke to the accompanying WCS/FA field teams during the visit.

Security was advised during the field visit by the local FA, and two Military Police officers of the Royal Cambodian Armed Forces accompanied the validation team during fieldwork into the more remote areas of the forest. Village visits were considered acceptably safe, although two staff from the Seima Biodiversity Conservation Project accompanied the visitors, to provide logistical support, and also to help support personal security.

Carbon Plots

The Seima carbon survey and measurement work turned out to have been very successful. The audit team selected a number of plots at random, from a pool of plots that were deemed accessible in a feasible length of time. They requested that they were able to observe the teams re-measuring the plots in the same manner as they had been measured the first time.

As expected, the metal tree-tags which had been applied to trees were absent in areas with even small amounts of human traffic. However, the method of marking the center of the plot with a length of reinforcement bar, sunk bellow the surface, was highly successful. This required the presence of a metal-detector. CMAC graciously provided a metal detector, and an operator, for the period of the validation visit. Unfortunately, the sub-plots had not been marked with the same method, and were therefore impossible to relocate with any precision. The exact center-point is important for repeat measurements during the validation.

Only one minor OFI was noted during the field visit relating to the carbon plots: this related to the randomization protocol for the dead-wood transects, as the protocol was

not sufficiently clear, in particular when. However, this was generally an excellent outcome for the project and a testament to the quality of the Carbon Plot survey team.

Community audit work

A challenging agenda was developed for the community visits. Most villages were deemed feasible to access, and the audit team selected a number of them at random. The field team accompanied them

The audit team also requested copies of large quantities of supporting documents. This included, for example, attendance lists and minutes of meetings which had been held some three years previously. This information was all organized carefully in the Phnom Penh headquarters of the Wildlife Conservation Society, and so was able to be provided. However, it is clear that a comprehensive and very organized filing system is required, in order to fulfill the requirements of this sort of audit.

Meetings with proponents, partners and other stakeholders

During the field visit, a number of meetings were held with a range of other local stakeholders, local authorities, the FA at national level, and local NGO partners. The content of these meetings was kept confidential, so we have little insight to report. However, our impression was that the meetings were about relevant areas of expertise which were referred to within the project design document. This included, for example, checking on the local partner CRDT (the Cambodian Rural Development Team), including a visit to their office. The competence, capacity and general understanding of their role within the REDD project we assume was the questioning.

Meetings with key experts

Technical elements of the project were handled by several key experts on specific topics, in particular for high-level GIS work, or for the detailed predictive spatial modeling of deforestation. The Auditor requested to discuss a range of technical issues with each of these experts, to verify that the key steps were done correctly and with appropriate rigor. In some cases, the work had been done many years ago, and it took significant reminders before the experts were able to talk confidently about the issues. They had also travelled on, and while the interviews were conducted on Skype, the time-zone issues between Seattle (where the SCS auditor is based) and Oxford, Kinshasa, Jakarta, Phnom Penh and Sydney, were often rather challenging, and scheduling these calls at mutually relevant times took many months.

Issuance of Findings

Three types of findings are typically issued:

Non-Conformity Report (NCR)**:** Receiving an NCR means that your methodology is not compliant with a specific requirement of an applicable protocol, methodology or standard. An NCR requires that you provide a plan for correcting the non-compliance. We cannot issue an opinion/statement on the methodology confirming that your methodology confirms to the appropriate requirement.

New Information Request (NIR)**:** This request signifies a need for supplementary information necessary for completion of our assessment report. Receiving an NIR does not necessarily mean your methodology is not in compliance with requirements. An NIR does, however, require a timely response. Please provide the requested information either within the Findings Presentation Workbook or as a separate attachment.

Opportunity for Improvement (OFI)**:** Receiving an OFI indicates an area that should be monitored or ideally, improved upon. OFI's are often an indication of something that may become a non-conformity if not given proper attention. A root cause analysis and corrective action plan are not required, but highly recommended. OFI's are considered by the audit team to be closed upon issuance, and a response to this type of finding is not necessary.

At the closing meeting of the validation, on 15 Novemebr 2013, a number of key issues were raised by the auditor that they had noted during the visit.

The initial formal findings document was issued on 16 December 2013, though has since been updated, with additional findings identified through the subsequent discussions with experts. The full findings worksheet for the validation audit, as issued by SCS, is available on request.

Corrective Action Plans

A corrective action plan can be provided to the auditor, to outline the steps which are expected to be taken in response to the finings.

In our experience, the corrective action plan should be as detailed as possible. In some cases, this becomes effectively the same work as the proposed corrective action itself. However, as noted below, the auditor is only required to give one round of responses to corrective actions (without additional cost), but is also permitted to discuss, or provide written feedback regarding, any proposed corrective action plans for response to the findings that were issued. This gives an extra opportunity to respond to the findings, and ensure that the approach being proposed is likely to resolve the issue, conform with the standard, and therefore close the finding.

SCS will prioritize responses for the first two months after validation findings are issued. Beyond that, there is no guarantee of being their priority action, and the project's issues drop behind others on the list. This is designed to incentivize those who respond promptly and efficiently. This should be borne in mind when planning the timing of the planned audit, and the responses to the findings.

As of September 2014, the validation audit is in it's final stages, and is expected to be completed by December 2014.

Cascading changes

Several changes that you make to the project documents may cause cascading changes through the rest of the document. This is particularly relevant for the carbon calculations and models. Due to the complexity of the calculations, the spreadsheets which house such calculations can easily trigger multiple cascading changes through other parts of the predictions. For models done in separate software (e.g. ArcGIS) this is even more of a challenging issue.

Similarly, the text of the project document is often thus affected, where changes must be reflected in other parts. This must be handled carefully, and a critical path analysis can be useful to identify where changes should start, to ensure a logical order. Such a analysis was done for the Seima REDD project validation process, which helped to identify where required changes might be most logically commence.

New VCS/CCBA rules issued *during* the validation process

During the course of the Seima REDD validation, several new rules have come about via the CCBA and VCS. In some cases, these have been applied retroactively by the auditor in several cases, one of which required an additional "add-on service" contract with SCS, despite the fact that the changes were relatively trivial.

New data available after PD written

IN some cases, since the development of the PD, more recent data has become available, which changes the focus of the finding significantly. One example of this is from finding CCB 2013.24. This finding states:

> Indicator GL2.1 requires the user to "Demonstrate that the project zone is in a low human development country OR in an administrative area of a medium or high human development country in which at least 50% of the population of that area is below the national poverty line". In response to this, the PDD states that "Cambodia is medium human development country ranking 139/187 with a score of 0.533 according to the UNDP Human Development Report and so not all parts of Cambodia automatically qualify under this criterion. However, the SPF area does qualify as the group of rural provinces that includes Mondulkiri (the 'Plateau/Mountain' group) had an estimated 58% of people below the poverty line in 2004, the last date for which relevant data are available (World Bank 2006)." While it has been possible to confirm that, as of 2004, an estimated 58% of people in the 'Plateau/Mountain' group were below the poverty line, the information cited as almost 10 years old as of the issuance of this finding. In the judgment of the audit team, this information is too "stale" to confirm that the requirement is met as of the time of the validation audit, particularly in Cambodia, where substantial changes have taken place over the last 10 years. Please provide more up-to-date information to substantiate that the project zone currently meets the requirements of indicator GL2.1.

More recent data was kindly located by UNDP Cambodia, from a report on the progress of implementation of the Millenium Development Goals by the the Ministry of Planning in 2013. This states that the poverty rate in Mondulkiri province is now 26.1%. This demonstrates excellent progress with poverty reduction by His Majesty's

Royal Government, and should be commended. However it means that the Seima project can now not apply for Gold certification under the CCBA rules (2nd edition).

The Costs of the Validation audit

The costs of the Validation were estimated as follows:

Item	Cost (USD)	Notes
Pre-validation (desk review)	13,200	11 Assessor-days
Validation costs	27,600	23 assessor days
Travel costs	6,080	Additional direct costs were incurred, such as hotels, vehicles, etc. which are not presented here.
Additional review	4,800	"Add-on service". Comprises 4 assessor days.
Follow-up field visit	4,800	"Add-on service". Additional direct costs were also incurred, such as hotels, vehicles, etc. which are not presented here.
TOTAL	**56,480**	

This cost includes only the issuance of only one iteration of findings for each round of findings (one round of findings from the desk review and one round of findings from the site visit, if applicable).

The $9,600 of additional "add-on service" was related to dealing with second round of findings, and an additional review of CCBA rules which came in since the beginning of the process.

Further additional services may still be required before Validation is complete. Examples of triggers to additional findings and additional assessment costs given by SCS include:

- Changes and updates to verification criteria, scope, materiality, level of assurance, objectives, and guidance;
- New evidence provided after the assessment outset that requires additional sampling time or site visits;
- Incomplete responses by the project proponent that require several iterations of findings.

Generous funding of around $46,000 was provided by JICA to support the validation audit. For complex contracting reasons, the funds were routed through Asia Air Services Co. Ltd, who kindly dealt with the contracting of the audit company.

4. Major Lessons and recommendations to other projects embarking on VCS validation or similar audits

Validation requires detailed information available to cover all steps
Documentary evidence is required for every stage of the validation process. Every single meeting, decision, event, issue, reference or piece of information referred to in the Project Design document *must* have comprehensive and believable documentary evidence to demonstrate compliance. An essential investment is a detailed and well-organized filing system, both for electronic and physical files.

The process is costly
The very level of technical capacity required to review a complex document against the standards, as well as the fact that validation remains a niche industry, means that the costs of the validation are very high. Additional costs beyond the basic contract are also not uncommon. Projects should budget at least $60,000 for the contracts, along with additional costs for preparatory and remedial work if needed.

The process can be very lengthy
The time required to do the validation is lengthy. Many of the corrective actions, in particular those which require extensive fieldwork, are very challenging, and reliant on seasonal factors. Promptly responding to findings, as well as leaving plenty of time for multiple iterations of findings is highly recommended. Depending on the scale of the project, in our experience, as part of an ongoing conservation program the process takes at least one year.

Clarity is required on plans, responses and timing
The audit process is very complex, with multiple simultaneous and subsequent steps; the process requires regular and very clear communication between the auditor and the proponent or their representatives. A key high-level coordinating technical expert, with a very clear understanding of the project document, the standards, and the project as a whole is an essential requirement for commencing such an audit.

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Appendix 1: Schedule for validation Field Visit

Day	Activity
Sunday, 10 November	• Travel to project area • Opening meeting • Discuss plan for remainder of week • Discuss project plans, history and objectives
Monday, 11 November	Field audit: • Interview local partners (e.g., CRDT, FA Cantonment, Seima Protection Forest FA officials) regarding project activities • Interview members of communities within the project zone · Re-location and re-measurement of carbon plots
Tuesday, 12 November	Similar agenda to that of 11 November (but in a different locale)
Wednesday, 13 November	Similar agenda to that of 11 November (but in a different locale)
Thursday, 14 November	Similar agenda to that of 11 November (but in a different locale); travel back to Phnom Penh
Friday, 15 November	· Meetings with FA Director-General and other key government people · Audit team to meet in private · Closing meeting

Appendix 2: Tasks listed by SCS for Validation Audit

Task 1: Discussion regarding conformance to CCB Standards criteria

Project personnel to be prepared to discuss the conformance of the project to the following criteria:

G1 (Original Conditions in the Project Area)—with particular emphasis on the following:

- Project personnel to answer questions regarding the boundaries of the project area and the project zone

G3 (Project Design and Goals)—with particular emphasis on the following:

- Project personnel to answer questions regarding planned project activities and their correspondence to the project's climate, community and biodiversity objectives

- Project personnel to answer questions regarding how communities and other stakeholders potentially affected by the project activities have been identified and have been involved in project design

- Project personnel to answer questions regarding the steps taken to publicize the CCBA public comment period to communities and other stakeholders and to facilitate their submission of comments to CCBA

- Project personnel to answer questions regarding the process for handling unresolved conflicts and grievances

- Project personnel to provide a demonstration that project revenues from emissions reductions and other sources are likely to provide an adequate flow of funds for project implementation

G4 (Management Capacity and Best Practices)—with particular emphasis on the following:

- Project personnel to answer questions regarding plans for partnering with other organizations, hiring and training employees and safeguarding worker safety

G5 (Legal Status and Property Rights)

- Project personnel to provide evidence (with reference to legal agreements, decrees or other official documentation, as necessary) that the project proponent holds complete and undisputed control over the project area Project personnel to answer questions regarding the "small percentage of the forest(<3%)" in which "local communities may be able to claim formal legal

ownership of forest lands", as described on page 170 of the project description
- Project personnel to answer questions regarding the Samling logging concession, as described on page 171 of the project description

Task 2: Discussion regarding conformance of risk report to AFOLU Non-Permanence Risk Tool

Project personnel to be prepared to discuss the conformance of the risk report to the requirements of the following categories:

- Project management—project personnel to present the "adaptive management cycle involving systematic monitoring, annual participatory review of progress, drafting of workplans and updating strategic plans", as described on page 169 of the project description, and provide a justification for why it constitutes an "adaptive management plan", as described in Section 2.2.1 of the AFOLU Non-Permanence Risk Tool

- Financial viability—project personnel to provide evidence that "Project has secured less than 15% of funding needed to cover the total cash out before the project reaches breakeven", as claimed on page 169 of project description

- Opportunity cost—project personnel to provide a justification for the statement that "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", as claimed on page 169 of the project description

- Project longevity—project personnel to demonstrate that the Subdecree creating the Seima Protection Forest meets the requirement for a "legal agreement or requirement to continue the management practice", as described in Section 2.2.4 of the AFOLU Non-Permanence Risk Tool

- Land ownership and resource access/use rights—discussion regarding potential areas of overlapping access/use rights and/or disputed land tenure or ownership, as described on page 171 of the project description; discussion regarding statement on page 171 of the project description that "The consent processes described in Sections 2.7 and 3.7 effectively resolve all overlapping community claims"

- Community engagement: project personnel to justify claims that "far more than 50% of households have been consulted" and "The great majority of dependent households living outside the project area have also been consulted", as stated on page 171 of the project description

- Political risk—justification to be provided to support the claim that "Cambodia is conducting a REDD+ Readiness process with supoort [sic] from both FCPF and UN-REDD", as stated on page 171 of the project description

- Natural risk—project personnel to provide information regarding how each claim with respect to natural risk is supported by the analysis required by Section 2.4.1(1) of the AFOLU Non-Permanence Risk Tool

Task 3: Review of delineated project area to demonstrate that the project area is entirely within the boundaries of the area over which the project proponent holds right of use

• Project personnel to be prepared to demonstrate the above through use of GIS systems or printed maps of adequate scale

Task 4: Replication of process of locating and measuring carbon plots as described in Annexes 5.3 and 5.5 of the project description

The following activities to occur with respect to the list of specific plots (or clusters of plots) identified by the audit team (as conveyed via email to Tom Evans, WCS, and as modified as necessary at the discretion of the audit team). Project personnel who are experienced in the measurement protocols employed must be available for this task. Sufficient personnel must be available as to allow for the re-measurement of selected plots in an efficient manner.

- Project personnel to provide original field data sheets for comparison of measurements
- Project personnel to re-locate the plot center
- Project personnel to completely replicate the process of measuring the plot and recording measurement data
- Project personnel to answer questions of audit team regarding measurement procedures
- Project personnel to provide any and all measurement equipment necessary for conduct of this task

Task 5: Interview project stakeholders and community members

The audit team will review selected project stakeholders and community members as part of this assessment. Project personnel will make every reasonable effort to facilitate this process, including making advance arrangements for said interviews, as requested.

Task 6: Review ex-ante quantification of GHG emission reductions

- Project personnel to be prepared to answer questions regarding workbooks, databases and other products used to perform quantification of GHG emission reductions
- Project personnel to provide a justification for the conformance of the factors and models used according to the VCS rules

Task 7: Review claims regarding additionality and the crediting baseline

• Project personnel to be prepared to answer questions regarding the additionality of

the project and the baseline scenario, as described in the project description

Task 8: Review claims regarding climate, community and biodiversity benefits

• Project personnel to be prepared to answer questions regarding the claimed climate, community and biodiversity benefits of the project, as described in the project description

Task 9: Review project monitoring plans and procedures

• Project personnel to be prepared to answer questions regarding the plans for monitoring of climate, community and biodiversity benefits, and the conformance of these plans to the VCS rules and the CCB Standards (as applicable)

Task 10: Review exceptional community and biodiversity claims

• Project personnel to be prepared to answer questions regarding the claims of exceptional community and biodiversity benefits, as described in the project description

Contact address

Secretariat of Cambodia REDD+ Taskforce
No. 40 Preah Norodom Blvd
Sangkat Psar Kandal 2
Khan Daun Penh, Phnom Penh, Cambodia
Tel: +855 023 224 251
Email: redd.secretariat@cambodia-redd.org