



**Plan Vivo Verification Report
Document Prepared by Aster Global Environmental Solutions, Inc.**

Project Name:	Drawa Rainforest Conservation Project
Plan Vivo Project #	PV_2018_20
Aster Global Project Number:	21084.00
Report Issuance Date:	1 August 2022

Project Proponent	The Nakau Programme Pty Ltd
Contact Name:	Robbie Henderson
Mailing Address	
Phone	+61 (0)437683929
Email	Robbie: Robbie.henderson@nakau.org

Offset Validation/Verification Body:	
Name:	Aster Global Environmental Solutions, Inc.
Corporate Offices:	3800 Clermont Ave NW North Lawrence, Ohio 44666
Phone:	+01.330.294.1242

Name of Verifier(s)	Date of Review
Aster Global Environmental Solutions, Inc.	16 December 2020 – 21 July 2022

Project Description

As stated in the Drawa Rainforest Conservation Project – Project Description Part A “The Drawa Forest Carbon Project aims to deliver enduring benefits to participating communities through the provision of payments (compensation) for the loss of income from timber harvesting that has been avoided. As part of the project community governance has been strengthened through the formation of the Drawa Block Forest Communities Cooperative and undertaking associated capacity building activities. This project aims to enable the Cooperative to manage funds received in a manner that brings sustainable benefits for the community in the form of community development initiatives, such as infrastructure improvements; supporting further income generating activities for cooperative members; and administering a process of distributing member dividends.

The core project aim is to reduce carbon emissions to the atmosphere by changing forest management in the eligible area from timber extraction to forest protection. The project will also protect watersheds resulting in the maintenance of healthy river systems as a high-quality source of drinking water and as habitat for aquatic species. Forest protection will reduce the vulnerability of local communities to climate related risk through reducing the impact of extreme rainfall events on soil erosion and flooding, and the impacts of drought on water security.”

The GHG assertion provided by the Drawa Rainforest Conservation Project and verified by Aster Global has resulted in the GHG emission reductions or removals of 94,850 tCO₂ equivalents (CO₂e) by the project during the reporting/monitoring period (06 September 2015 – 06 September 2020). A buffer withholding (18,970 tCO₂e) was allocated based on the 20% risk buffer as specified in the methodology and leading to a PVC issuance of 75,880 tCO₂e.

Document	Outstanding Corrective action	Activity against CAR
N/A	<i>There are no outstanding corrective actions.</i>	N/A

Forward Action Requests (FAR)

Aster Global is issuing 1 FAR related to the Drawa Rainforest Conservation Project. During this verification the, the project applied a PD Deviation that states “The DBFCC (landowner cooperative) did not prepare written ‘project management reports’ to present at annual ‘project management meetings.’ This includes the once per verification cycle ‘project monitoring meeting’ that was to replace the usual project management meeting. In lieu of this the DBFCC held Annual General Meetings (AGMs) which is required under the Cooperative Act. These served to engage the DBFCC membership on a similar agenda as was intended for a management meeting. Formal project management reports were not prepared for ‘approval.’ However, the DBFCC executive tabled and presented financial and project management information at the AGMs.

Nakau considered the AGMs to be sufficient to achieve the project management meeting purpose with respect to engaging members on land use, governance, benefit sharing, transparency and accountability. However, we will work with the DBFCC to improve their capacity to produce project

management reports in the future."

Aster Global is issuing a FAR for the next VVB to request that the project provide specific updates on how the project has worked with DBFCC to improve their capacity to produce the project management reports.

Description of field visits (including list of sites visited and individuals/groups interviewed)

Aster Global Environmental Solutions Inc (herein referred to as Aster Global) developed a site visit plan for the Drawa Rainforest Conservation Project verification as the site visit is a required tool to help the Validation and Verification Body (VVB) reach reasonable assurance. It also allowed the VVB; to understand application of the methodology on-site, to confirm the implementation of Drawa Rainforest Conservation Project activities, and to identify possible sources of error to focus desktop verification efforts.

For the field sampling effort, monitoring procedures and observation, interviews and review of the carbon losses and community elements in the key areas were determined to be some elements with the largest risk and were prioritized. While conducting sampling efforts, the VVB visited examples (wherever possible) of other project activities that have been implemented.

Interviews were performed during the verification site inspection and as part of the overall verification process. The Aster Global verification team met with individuals with various roles in the project. This included a series of interviews with on-site and in-country staff that support the mission of the project and other conservation objectives.

Due to the ongoing global COVID-19 pandemic, the core Aster Global staff were unable to travel to the Solomon Islands. However, the site visit was performed in the conventional manner with interviews and observations performed by Aster Global's in-country subcontractor, Patrick Fong.

Onsite interviews and informal discussions were conducted with The Nakau Programme (Programme Operator) staff, Live and Learn Fiji (Project Coordinator) staff, the Drawa Block Forest Community Cooperative (DBFCC) (Project Owner) members and leaders, rangers (responsible for monitoring activities), and community groups. Both the Batiri and Nayarailagi villages were visited.

During the site visit, it was not possible for the VVB to visit the Eligible Forest Areas (carbon accounting area) as the Eligible Forest Areas for the visited communities are far from where community members live. Additionally, because remote sensing analysis is the primary method for monitoring deforestation within the Eligible Forest Areas which was conducted by the Nakau Programme and reviewed by the VVB, interviews with the community members, including rangers, were deemed the highest risk item and prioritized.

List of individuals interviewed:

Individual	Affiliation	Role	Date
Robbie Henderson	Nakau Programme	CEO	Throughout audit
Michael Dyer	Nakau Programme	Senior Project Manager & Technical Advisor	Throughout audit

Sarah Liversidge	Nakau Programme	Business Administration Manager	Throughout audit	
Beato Dulunaqio	Live & Learn Fiji	Team Leader	Throughout audit	
Pamapasa Ligu	Batiri Village		10 February 2022 – 11 February 2022	
Penkoni Kayvi	Batiri Village		10 February 2022 – 11 February 2022	
Jove	Batiri Village		10 February 2022 – 11 February 2022	
Rafaela Rupen	Batiri Village		10 February 2022 – 11 February 2022	
Sireli Railoa	Batiri Village		10 February 2022 – 11 February 2022	
Litea Diloki	Batiri Village		10 February 2022 – 11 February 2022	
Waita Cururale	Batiri Village		10 February 2022 – 11 February 2022	
Vilka Wati	Batiri Village		10 February 2022 – 11 February 2022	
Losalini Cegu	Batiri Village		10 February 2022 – 11 February 2022	
Losalini Tabakeu	Batiri Village		10 February 2022 – 11 February 2022	
Sereana Cakau	Batiri Village		10 February 2022 – 11 February 2022	
Jotivini Bynician	Batiri Village		10 February 2022 – 11 February 2022	
Warasi	Batiri Village		10 February 2022 – 11 February 2022	
Senesa Iviyid	Batiri Village		10 February 2022 – 11 February 2022	
Jeramia Lotawa	Batiri Village		10 February 2022 – 11 February 2022	
Muliakere Tubuale	Batiri Village		10 February 2022 – 11 February 2022	
Melenia Talen	Batiri Village		10 February 2022 – 11 February 2022	
Jerry Lotawa		Lead Forest Ranger	17 March 2022 (Remote Interview)	
Kalouniviti Loaloadravu		Forest Ranger	17 March 2022 (Remote Interview)	
Kinijoji Volitiyasawa		Forest Ranger	17 March 2022 (Remote Interview)	

Sulaski Raej				
Mesake Naivaluunga				
Merelea Bogi				
Serviwaca V.				
Reni Maision				
Elomi Sonowaga				
Mesui Sehel				
Senimili				
Laisenia R				
Vasemaca Kurucake				
Nakele				
Aminiasi Olera				
Kece				
Sereana Rosi				
Iva Domolte				
Jone Muasola				
Timoci Tukaki				
Sairusi Sava				
V. Wasulumafe				
Wakerela Dravi				
Amele D				
Pita				

Timaleti D				
Viliame D				
Manafa R				
Litia B.				

Table 1. Summary of major and minor Corrective Actions (Insert CAR Text)

Theme	Major CARs	Minor CARs	Observations	Status
Project's Eligibility				
Ecosystem Benefits				
Project Coordination and Management				
Participatory design				
Quantifying and Monitoring				
Ecosystem Services				
Risk Management				
Livelihoods Impacts				
PES Agreement				

Table 2 - Report Conformance (Delete Yes/No as appropriate)

Theme	Conformance of Draft Report	Conformance of Final Report
Project's Eligibility	Yes	Yes
Ecosystem Benefits	Yes	Yes
Project Coordination and Management	Yes	Yes
Participatory design	Yes	Yes
Quantifying and Monitoring	Yes	Yes
Ecosystem Services		
Risk Management	Yes	Yes
Livelihoods impacts	Yes	Yes
PES Agreement	Yes	Yes

Verification Opinion: After completion of a site inspection and review of all project information, procedures, calculations, and supporting documentation, Aster Global Environmental Solutions, Inc., confirms the Project is accurate, consistent, and complies with all criteria in the Plan Vivo Standard 2013 and the selected methodologies (Nakau Methodology Framework and Technical Specifications Module: (C) IFM-LtPf v1.1: Improved Forest Management – Logged to Protected Forest V1.0 for the Nakau Programme). Aster Global confirms the *Drawa Rainforest Conservation Project Monitoring report (Version 1.1 dated 06 May 2022)* has been implemented in accordance with Plan Vivo Standard 2013 criteria. Additionally, Aster Global confirms that the project documents represent an accurate and clear description of the project and its activities-based monitoring.

PROJECT'S ELIGIBILITY							
Requirement: Project directly engage and benefit community groups							
Verification Question: 1 and 2							
<p>1.1 Project interventions are still taking on land where smallholders and/or community groups have clear land tenure (1.1)</p> <p>1.2 Land that is not owned by or subject to use rights has included in the project area because (1.2):</p> <ul style="list-style-type: none"> • It represents less than a third of the project areas at all times • No part of the area was acquired by a third party from smallholders or community groups for the purpose of inclusion in the project • Its inclusion will have clear benefits to the project by creating landscape level ecosystem benefits such as biodiversity corridors. • There is an executed agreement between owners/managers of such land and participants regarding the management of the area consistent with these requirements 							
A. Findings (describe)	Land tenure and ownership was reviewed during project validation, which did not occur concurrently with this verification. The project has updated the project accounting area i.e. Eligible Forest Area (EFA) as a result of a clarification issued by the VVB. This resulted in a minor change, approximately 40 hectares, in the project accounting area. The new project area is approximately 1,588 hectares and the VVB confirmed that the quantification of the EFA is correct. However, this minor change has not affected the validated project area which has remained the same since validation.						
B. Conformance	<table> <tr> <td>Yes</td> <td><input checked="" type="checkbox"/></td> <td>No</td> <td><input type="checkbox"/></td> <td>N/A</td> <td><input type="checkbox"/></td> </tr> </table>	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>		
C. Corrective Actions (describe)	All Corrective Actions that were identified based on the Plan Vivo Standard, 2013 are reported in Annex 1. Additionally, Annex 1 of this report contains all Corrective Actions and the Project's responses that were identified during this verification event.						
D. (Insert Project Coordinator's Name) Response	Please see Annex 1.						
E. Status	All corrective actions have been closed.						

ECOSYSTEM BENEFITS			
Requirement: Project generates ecosystem service benefits and maintains or enhances biodiversity.			
Verification Questions: 1, 3 and 5			
2.1 Project interventions are maintaining or enhancing biodiversity (2.2) 2.2 Project interventions have not led to any negative environmental impacts (2.3) 2.3 Any trees being planted to generate ecosystem services are native or naturalised species and are not invasive (2.4)			
A. Findings (describe)	This project is an avoided deforestation project and at its core it is protecting vital biodiversity maintaining habitat. During the site visit community members expressed the sentiment that the project has been increasing the abundance of biodiversity which has led to more hunting opportunities for pigs and has prevented the spread of the invasive African tulip. Through interviews conducted during the site visit, the VVB is reasonably assured that the project intervention is maintaining and/or enhancing biodiversity and has not led to any negative environmental impacts. After a review of all project documentation and interviews with the relevant stakeholders, the VVB is reasonably assured that the project interventions have not led to any negative environmental impacts. The project is not planting trees to generate ecosystem services so 2.3 is not applicable.		
B. Conformance	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
C. Corrective Actions (describe)	All Corrective Actions that were identified based on the Plan Vivo Standard, 2013 are reported in Annex 1. Additionally, Annex 1 of this report contains all Corrective Actions and the Project's responses that were identified during this verification event.		
D. (Insert Project Coordinator's Name) Response	Please see Annex 1.		
E. Status	All corrective actions have been closed.		

PROJECT COORDINATION AND MANAGEMENT	
Requirement: Project is managed with transparency and accountability, engagement of relevant stakeholders and in compliance with the law of the Host Country.	
Verification Questions: 1, 2 and 6	
3.1 The project coordinator still has the capacity to support participants in the design of the project interventions, select appropriate participants for inclusion in the project, and	

	<p>develop effective participatory relationships including providing on-going support to sustain the project (3.4)</p> <p>3.2 The project coordinator still has the legal and administrative capacity to enter into PES Agreements with participants and to manage the disbursement of payments for ecosystem services (3.5)</p> <p>3.3 A transparent mechanism and procedures for the receipt, holding and disbursement of PES funds is applied, with funds intended for PES earmarked and managed through an account established for this sole purpose, separate to the project coordinator's operational finances. (3.9)</p> <p>3.4 The project coordinator has accurately described the progress, achievements and problems encountered by the project in the Annual Reports. The Annual Reports transparently report sales figures and demonstrate resource allocation in the interest of target groups (3.10; 3.11)</p>
A. Findings (describe)	<p>3.1 During the course verification, the VVB conducted interviews with the project coordinator, programme operator, and the DBFCC community members. Based on a review of supporting documentation and interviews with the relevant stakeholders, the VVB is reasonably assured that the project coordinator still has the capacity to support DBFCC in the implementation of this project. Additionally, the audit team is reasonably assured that there continues to be an effective participatory relationship between all groups participating in the project.</p> <p>3.2 During interviews with Live & Learn Fiji (project coordinator) and the Nakau Programme (Programme Operator), the VVB found no evidence that either of these organizations no longer has the legal and/or administrative capacity to enter into the PES agreements. The PES agreement and PDD clearly describe how payments will be disbursed and the requirements for each organization.</p> <p>3.3 The VVB is reasonably assured that a transparent mechanism and procedures are in place to effectively manage the disbursement of payments. Plan Vivo has already validated the Nakau Methodology Framework and Technical Specifications module. During this verification, the VVB confirmed that the validated methodology related to transparent systems for the disbursement and monitoring of payments was implemented correctly. Additionally, DBFCC has a clear and transparent business plan that will continuously be updated by the participating communities to manage the project, determine how payments will be used and allocated to community households.</p> <p>3.4 The Monitoring Report (MR) explains that simplified monitoring of the EFA occurred in 2015-2018 due to insufficient funding and that no on-the-ground monitoring data was collected. More comprehensive monitoring started in 2019 and results along with GPS tracks are reported in Appendix 3 of the MR. In the future, the project proponent plans to conduct annual monitoring of the EFA instead of biannual, as specified in the PDD, because the on-the-ground transect monitoring</p>

	is an intensive process that requires too much time to monitor twice a year. Additionally, the MR now explains changes to the remote sensing data used for monitoring the project area. It is not expected that these methodology deviations will materially affect the project. The audit team reviewed the BFCC Annual Operating Budget and confirms that resources are allocated to target groups appropriately.		
B. Conformance	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
C. Corrective Actions (describe)	All Corrective Actions that were identified based on the Plan Vivo Standard, 2013 are reported in Annex 1. Additionally, Annex 1 of this report contains all Corrective Actions and the Project's responses that were identified during this verification event.		
D. (Insert Project Coordinator's Name) Response	Please see Annex 1.		
E. Status	All corrective actions have been closed.		

PARTICIPATORY DESIGN AND DEVELOPMENT OF PLAN VIVO

Requirement: the project has demonstrated community ownership: communities participate meaningfully through the design and implementation of plan vivos that address local needs and priorities.

Verification Questions: 1, 2 and 6

- 4.1 A voluntary and participatory planning that address local needs and inform the development of technical specification is taking place (4.1; 4.6; 7.1.). Barriers to participation are being identified and measures taken to encourage participation (4.3)
- 4.2 Smallholders or communities are not being excluded from participation in the project on the basis of gender, age, income or social status, ethnicity or religion, or any other discriminatory basis (4.2)
- 4.3 The project is not undermining the livelihood needs and priorities or reduce the food security of the participants (4.7; 7.1; 7.5)
- 4.4 There exist a system for accurately recording and verifying location, boundary and size of each plan vivo (4.8). Participants have access to their *plan vivos* in an appropriate language and format (4.9)
- 4.5 Participants are being provided with a forum to periodically discuss the design and running of the project with other participants and raise any issuance or grievances with the project coordinator (4.12). A robust grievance redressal system is in place (4.14)

A. Findings (describe)	4.1 The VVB is reasonably assured that the planning process was voluntary and participatory as was confirmed at validated. During the course of the verification, the audit team interviewed the Nakau Programme, Live & Learn Fiji, community members and reviewed evidence to determine if the project used a community led approach to planning. During the early planning phases of the project, efforts were taken to inform the communities about the PES projects and how they function. The formation of the ownership group and
-------------------------------	--

	<p>associated communities, establishment of the Protected Areas (EFAs), determination of project management roles, establishment of the PES agreement and associated benefit sharing plan, and development of the management plan were all planning activities in which the community was involved. The VVB reviewed meeting reports and minutes documenting how the community was involved in the different aspects of planning as described in the PDD Part A. During interviews with community members and leaders, the community indicated that it was supported by the Nakau Programme and Live & Learn Fiji in establishing the project and has received on-going support in the running of the project. All participating communities have land-use plans that dictate what kind of land uses may take place on different community owned lands. In these land use plans, there are set aside areas that are to be maintained as forest areas, which are the areas included in the Eligible Forest Areas (the project accounting area). The project has put specific measures in place to ensure that youth and women are participating in the project and receive benefits from the project.</p> <p>4.2 Throughout the course of the verification the VVB found no evidence that communities are being excluded from participating in the project as a result of discrimination. Additionally, the project has put specific measures in place to ensure that youth and women are included in the project and receive benefits from the project.</p> <p>4.3 As stated previously, DBFCC was involved in the project planning, specifically the creation of their community land use plans. Within these land use plans, there are specific areas dedicated to agriculture expansion to ensure livelihood needs and priorities are maintained. Additionally, communities are allowed to extract NTFP (non-timber forest products) from the EFAs to maintain communal access to traditional food sources. During the site visit multiple community members indicated that hunting opportunities have increased in their protected forests. The results of the socio-economic impact survey conducted in 2020 indicated that more households were running out of food. However, the survey indicated that garden sizes have increased and average income has also increased. The results of the survey seem to contradict each other. The VVB discussed this issue with the Program Operator and Project Coordinator to better understand what may be causing the seemingly juxtaposed results within the survey. The project suggested that this may be due to increasing volatile weather patterns. During the site visit the VVB interviewed community members regarding food security in relation to the project and no participants indicated that the project was resulting in increased food insecurity. The VVB is reasonably assured that the project is not undermining the livelihood needs and priorities of the Sirebe Community.</p>
--	--

	<p>4.4 As confirmed at validation, there is a system in place for accurately recording the size and location of each plan vivo and that the communities have access to their plan vivos in an appropriate language. During interviews with community members, they explained that they knew where each area was and the allowable use. Additionally, community members indicated that areas are visibly marked to ensure all community members understand the different areas and the allowable uses. All the rangers participating in the monitoring of the Eligible Forest Areas have access to Avenza maps which uses a PDF geolocated map showing the Eligible Forest Areas.</p> <p>4.5 The Annual Reports and supporting evidence provide by the Programme Operator detailed descriptions of meetings that were held during the monitoring period and were reviewed by the VVB. Additionally, during the site visit community members described the meetings that were held during the monitoring period and described how they access information about the project. No interviewees indicated that they have not been provided a forum to discuss the running of the project. Although there are no detailed records of meetings that occurred in 2016 due to funding constraints, the VVB reviewed evidence that meetings took place during the other years of the monitoring period and is reasonably assured that engagement with DBFCC and communities occurred. The grievance redressal structure is outlined in the PES agreement and the VVB found no evidence that the system is not functioning as described in the PES agreement.</p>		
B. Conformance	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
C. Corrective Actions (describe)	All Corrective Actions that were identified based on the Plan Vivo Standard, 2013 are reported in Annex 1. Additionally, Annex 1 of this report contains all Corrective Actions and the Project's responses that were identified during this verification event.		
D. (Insert Project Coordinator's Name) Response	Please see Annex 1.		
E. Status	All corrective actions have been closed.		

QUANTIFYING AND MONITORING ECOSYSTEM SERVICES

Requirement: project generates real and additional ecosystem service benefits that are demonstrated with credible quantification and monitoring

Verification Questions: 2, 3 and 4

<p>5.1 Sources of data used to quantify ecosystem services, including all assumptions and default factors, have been specified and updated, when possible, with a justification why they are appropriate (5.1; 5.2)</p> <p>5.2 The project coordinator has been conducting ground-truthing activities in order to collect real data and field measurements from the project sites that have been or will be used to update the project's PDD and technical specifications, including the quantification of climate benefits (5.3)</p> <p>5.3 A clear and consistent Standard Operating Procedure (SOP), or equivalent, for remote sensing analysis has been elaborated by the project coordinator.</p> <p>5.4 The results of the remote sensing analysis are not in stark conflict with the results of Activity-Based Monitoring and there is a high level of correlation between the two monitoring methods. Reasons for any discrepancy have been accurately justified.</p> <p>5.5 Ecosystem services forming the basis of the Plan Vivo project are still additional (5.4).</p> <p>5.6 To avoid double counting of ecosystem services, the project interventions are not being used for any other project or initiative (5.14)</p> <p>5.7 A monitoring plan has been correctly implemented and a system for checking its robustness is in place, where (5.9; 7.2.; 7.3):</p> <ul style="list-style-type: none"> • The Activity-Based Monitoring indicators and performance targets directly or indirectly linked to the delivery of ecosystem services. ABM provides sufficient evidence that the project is on track to deliver the expected impacts and to reduce the drivers of deforestation. • Corrective actions and contingency plans are described when performance targets have not been met • The validity and assumptions of the technical specifications have been correctly tested • Communities have been actively participating in monitoring activities • Monitoring has been regularly shared and discussed it with the participants 	<p>A. Findings (describe)</p> <p>5.1 As confirmed at validation, the project describes and justifies all assumptions and default factors that have been used to quantify ecosystem services. During the verification, the VVB confirmed that although the Fiji Forest Act of 2016 has yet to be gazetted the Fiji Forest Act 2016 Section 20 allows that all existing licenses issued under the Forest Decree 1992 remain valid. The VVB is reasonably assured that the baseline scenario for the project is still valid.</p> <p>5.2 The project has been continuously conducting ground-truthing activities to ensure that ongoing monitoring requirements are conducted as required in the project's monitoring plan. The VVB reviewed evidence, specifically GPS tracks of the EFA monitoring, to confirm that the monitoring was conducted in line with the requirements of the PDD. The project has deviated from the monitoring plan with respect to the bi-annual EFA and boundary monitoring. The project believes that this is a minor change to the monitoring plan as the monitoring will not be carried out annually rather than bi-annually. The project will use the remote sensing analyses to ensure that all deforestation that occurs within the EFA is accurately captured and reported.</p>
---	---

	<p>5.3 The VVB has reviewed and confirmed that there are SOPs for the remote sensing monitoring.</p> <p>5.4 The VVB reviewed the results of the deforestation monitoring conducted by the Rangers (Activity-Based Monitoring) and the results of the deforestation monitoring using remote sensing data. There was approximately 1 hectare of deforestation that occurred within the most recent monitoring period which was found by the on-the-ground monitoring conducted by the forest rangers and remote sensing analyses. The VVB is reasonably assured that the results between the two monitoring systems are not in stark conflict of each other.</p> <p>5.5 During this monitoring period, the project conducted a baseline reassessment to determine whether there have been regulatory changes that could impact the additionality of the project and the project's baseline scenario. The VVB conducted a review of the regulatory changes and found no evidence that the project is no longer additional.</p> <p>5.6 The VVB reviewed multiple public registries with active carbon projects and found no evidence that this project intervention is being used for any other carbon project or initiative. Fiji is currently developing a jurisdictional REDD program under the Forest Carbon Partnership Facility (FCPF) Carbon Fund; however, no credits have been issued to this ER Program. Furthermore, the Drawa Project continues to work with the Fijian government to assure there is no double counting. The VVB is reasonably assured, there was no double counting of emission reductions during this monitoring period.</p> <p>5.7 During the course of this verification the VVB reviewed the validated monitoring plan as it relates to the monitoring of carbon, community, and biodiversity impacts. Forest rangers (community members) conducted annual deforestation monitoring, boundary inspections, and activity shifting leakage inspections during the monitoring period and the results of this monitoring are supported by the remote sensing analyses used to monitor deforestation within the EFAs. The VVB is reasonable assured that the monitoring system for carbon benefits has been implemented as described in the validated PD (noting the PD Deviations applied by the project during this monitoring period) and that the results of the monitoring are accurate.</p> <p>The primary tool for monitoring community impacts is the Community Impact Monitoring surveys that are conducted every 3-5 years. In 2020 the Community Impact Monitoring surveys were implemented. The VVB reviewed the raw data associated with these surveys and the Drawa Forest Conservation Project 2nd Socio-economic Impact Survey 2020 to confirm the results of the survey were analysed and reported accurately. Furthermore, to confirm the accuracy of these surveys the</p>
--	---

	<p>VVB conducted community interviews to substantiate the results of the community surveys. The VVB is reasonably assured that community impact monitoring has taken place in line with the requirements of the PD and the results accurately reflect the impacts to participating communities.</p> <p>Biodiversity is primarily monitored through surveys conducted by partnership groups that are not directly affiliated with the project. During this monitoring period, the project partnered with the Institute of Applied Science of the University of the South Pacific to conduct a rapid assessment of biodiversity within the project area. Furthermore, the most important component of this project as it relates to the maintenance and enhancement of biodiversity is prevention of deforestation within the project area. There was approximately 1 hectare of deforestation within the project area, substantially less than what would have been logged in the baseline scenario. Therefore, the VVB is reasonably assured that the biodiversity has been appropriately monitored and biodiversity.</p>		
B. Conformance	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
C. Corrective Actions (describe)	All Corrective Actions that were identified based on the Plan Vivo Standard, 2013 are reported in Annex 1. Additionally, Annex 1 of this report contains all Corrective Actions and the Project's responses that were identified during this verification event.		
D. (Insert Project Coordinator's Name) Response	Please see Annex 1.		
E. Status	All corrective actions have been closed.		

RISK MANAGEMENT

Requirement: The project manages risks effectively throughout its design and implementation.

Verification Questions: 2 and 4

- 6.1 Where leakage is likely to be significant, i.e., likely to reduce climate services by more than 5%, an approved approach has been used to monitor leakage and subtract actual leakage from climate services claimed, or as a minimum, a conservative estimation of likely leakage has been made and subsequently deducted from the climate services claimed (6.1; 6.2)
- 6.2 The level of risk buffer that has been determined using an approved approach is adequate and is a minimum of 10% of climate services expected (6.3)
- 6.3 Does the project maintain a buffer account and is the cumulative total of credits deposited in the account equal to the total reported in the latest annual report? (6.3)

A. Findings (describe)	<p>6.1 The project was designed to mitigate leakage where possible, as confirmed during validation. Market leakage was determined to be zero during validation and the validated value has been applied. Activity shifting leakage constitutes harvesting outside areas that have been declared as part of the project area in the PD. There was no activity shifting leakage reported during the monitoring period. During the site visit the audit team interviewed community members about whether or not commercial harvesting was taking place within the communities but outside the project area. No interviews indicated that commercial harvesting is occurring. The only harvesting noted from the interviews was occurring in the areas of land outside the project area but zoned for agriculture expansion within the community land use plans. This is not activity shifting leakage because this land has been specifically zoned for agriculture expansion. As all communities have land use plans and the VVB found no evidence that the land use plans are not understood or implemented, the VVB is reasonably assured that no activity shifting leakage has occurred.</p> <p>6.2 Risks to the delivery of ecosystem services and sustainability are identified and appropriate mitigation measures are described. A Risk Management Framework updated for 2020-2021 includes possible social risks, financial risks, health and safety risks, and risks to permanence as well as mitigation measures for each risk. The methodology requires a 20% allocation to the risk buffer. The VVB confirmed that the risk buffer is correctly applied.</p> <p>6.3 The validated PD states that 20% of the issues PVCs will be held in a buffer pool. During this monitoring period, the project has appropriately applied this 20% risk buffer and has contributed 18,970 PVCs to the buffer pool. The VVB reviewed the IHS Markit Registry and confirmed that the previous allocation to the buffer reserve from the first verification has appropriately been allocated to the buffer reserve. To date, buffer credits have not been deposited for this monitoring period; however, the project has appropriately quantified the buffer reserve contribution and has accurately reported this value in the monitoring report and issuance request documents.</p>
B. Conformance	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
C. Corrective Actions (describe)	All Corrective Actions that were identified based on the Plan Vivo Standard, 2013 are reported in Annex 1. Additionally, Annex 1 of this report contains all Corrective Actions and the Project's responses that were identified during this verification event.
D. (Insert Project Coordinator's Name) Response	Please see Annex 1.
E. Status	All corrective actions have been closed.

PES AGREEMENT AND BENEFIT SHARING	
Requirement: project shares benefits equitably and transact ecosystem services benefits through clear PES Agreements with performance-based incentives.	
Verification Questions: 1, 2 and 6	
<p>7.1. Procedures for entering into a PES Agreement with participants are being applied correctly (8.2)</p> <p>7.2. Participants are entering into PES agreement voluntarily and according to the principle of free, prior, informed consent, in an appropriate language and format (8.3)</p> <p>7.3. PES Agreements are not removing, diminishing or threatening participant's land tenure (8.4)</p> <p>7.4. A fair and equitable benefit-sharing mechanism is in place and has been agreed with the participation of communities involved, identifying how PES funding will be distributed among participants (8.8; 8.9; 8.10)</p> <p>7.5. The project has committed to deliver at least 60% on average of the proceeds of the sales of Plan Vivo Certificates. Where less than 60% has been delivered, the project has justified why this was not possible (8.12)</p>	
A. Findings (describe)	<p>7.1 As required by the validated methodology and the Plan Vivo Standard, the PDD describes procedures for entering into PES Agreements. The PES agreement describes all the necessary procedures, and during the site visit the VVB confirmed the community understands its responsibilities as it relates to the agreement. During this monitoring period the PES agreement with the participating communities were updated. The originally signed PES agreements allowed for the communities to be paid based on a fixed price for each issued PVC rather than a commitment to allocate 60% of revenue to the participating communities. The new PES agreements were signed in 2019 and from that point forward 60% of project revenue will be transferred to the participating communities.</p> <p>7.2 The methodology has a robust free, prior, and informed consent framework and the VVB found no evidence that the PES agreement was not entered into voluntarily. During the site visit, the VVB found no evidence that the robust FPIC process was not implemented. Similarly, the VVB found no evidence that any community members felt like FPIC had not been achieved.</p> <p>7.3 The PES agreement specifically states that the Project will not impact the right of landowners to harvest resources for their needs outside of the restrictions outlined in the project documents. Furthermore, during the site visit the VVB found no evidence that participating communities land tenure has been infringed on or threatened as a result of the PES agreements.</p> <p>7.4 The PES agreement is in place until 2042 and was confirmed to meet all the requirements of the Plan Vivo Standard during the project's validation. Benefits are delivered to participants through payments that are distributed and reinvested by the DBFCC</p>

	<p>cooperative according to their plans and priorities.</p> <p>7.5 The original signed PES agreement stated that a fixed price per credit sold would be distributed to the DBFCC communities, which resulted in less than 60% of the proceeds being delivered. This was done to ensure costs of the project would be covered. Updated PES agreements were signed in June of 2019 and designate 60% of the revenue to the DBFCC communities. Payment worksheets show that starting in June 2019, 60% of revenue from the carbon sales went to DBFCC.</p>			
B. Conformance	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	
C. Corrective Actions (describe)	All Corrective Actions that were identified based on the Plan Vivo Standard, 2013 are reported in Annex 1. Additionally, Annex 1 of this report contains all Corrective Actions and the Project's responses that were identified during this verification event.			
D. (Insert Project Coordinator's Name) Response	Please see Annex 1.			
E. Status	All corrective actions have been closed.			

The Verifier: (Name in Capital Letters)



Signature: (Lead Verifier: Shawn McMahon):

Date: 1 August 2022

ANNEX 1: Corrective Actions Issued during the Verification

Item Number	1
Plan Vivo Standard 2013 Section	2. Eligible project activities
Plan Vivo Standard 2013 (Subsection and Description)	2.2. Project interventions must be designed to maintain or enhance biodiversity and any threats to biodiversity caused by the project intervention must be identified and mitigated.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	MR Section 7.3
Findings - Round 1	<p>As a forest protection project, biodiversity will be at a minimum be maintained. The audit team reviewed the Biodiversity Assessment 2018 and found no negative effects of the project activity on biodiversity.</p> <p>The audit team notes that during the site visit the audit team will interview rangers regarding biodiversity monitoring and affects on biodiversity.</p>
Round MCAR/mCAR/OFI	1 MCAR: The audit team notes that the MR states that a 2019 Rapid Biodiversity Assessment report was provided however the audit team online found a 2018 Rapid Biodiversity Assessment. Please provide the 2019 Rapid Biodiversity Assessment report.
Round 1 Response from Project Proponent	The MR report (p. 56) has been corrected to refer to the 2018 report. It was referred to as the 2019 report in error.
Findings - Round 2	The MR section 7.3 now correctly refers to the 2018 Rapid Biodiversity Assessment, which the audit team has reviewed. This item is addressed.

Item Number	2
Plan Vivo Standard 2013 Section	3. Project coordination and management
Plan Vivo Standard 2013 (Subsection and Description)	3.2. If coordinating functions are delegated or shared between the project coordinator and another body or bodies, the responsibilities of each body must be clearly defined and formalized in a written agreement, e.g. Memorandum of Understanding, which must be kept up-to-date as the project progresses.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	Drawa PES Agreement
Findings - Round 1	A PES agreement between the programme operator, project coordinator, and project owner was provided but was unsigned.
Round MCAR/mCAR/OFI	1 MCAR: Please provide a signed copy of the up-to-date PES agreement.
Round 1 Response from Project Proponent	The signed PES agreement has been added to the key project documents folder

Findings - Round 2	The PES agreement signed by Live & Learn and the Drawa Block Forest Communities Cooperative was provided. This item is addressed.
---------------------------	---

Item Number	3
Plan Vivo Standard 2013 Section	3. Project coordination and management
Plan Vivo Standard 2013 (Subsection and Description)	3.4. The project coordinator must have the capacity to support participants in the design of project interventions, select appropriate participants for inclusion in the project, and develop effective participatory relationships including providing ongoing support as required to sustain the project.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PD Part A section 2.13.4
Findings - Round 1	<p>The project coordinator has not changed since the validation of the Drawa project. Based on the feedback from community members it appears that community households have reported less access to information which the MR states is partially due to staff turnover within Live and Learn FIJI. Additionally, the MR states the global pandemic has negatively affected the project coordinators ability to interact with the project owner and associated communities. The audit team was unable to find current evidence that Live and Learn Fiji maintains the necessary capacity to support project participants in this project.</p> <p>The audit team notes that during the site visit the audit team will interview different staff members of Live and Learn Fiji to better understand their capacity, limitations, and community engagement.</p>
Round MCAR/mCAR/OFI	1 MCAR: Please provide verifiable evidence that community concerns over their access to project information necessary to satisfy these criteria have been implemented.
Round 1 Response from Project Proponent	Live & learn maintains its capacity to deliver project coordination services, as per the PES agreement. A document entitled 'project coordinator capacity - live & learn' has been added to the response to findings folder. It includes details regarding organisational capacity and identified the key personnel who support the project. The challenges for engaging with communities over the covid period are acknowledged, however all efforts are being made to increase engagement and flow of information.

Findings - Round 2	<p>Additional information on the Live & Learn organization and its capacity to implement project activities has been provided. Live & Learn appears to have the personnel and experience in community-based projects to be able to effectively support project participants.</p> <p>During the site visit the community felt that Live & Learn was doing a good job in supporting the communities and the project but noted that during Covid it was hard to interact with them, which was due to Covid-19 restrictions implemented by the Fijian Government. This finding is closed.</p>
---------------------------	---

Item Number	4
Plan Vivo Standard 2013 Section	3. Project coordination and management
Plan Vivo Standard 2013 (Subsection and Description)	3.6. The project coordinator must undertake a stakeholder analysis to identify key communities, organizations, and local and national authorities that are likely to be affected by or have a stake in the project. This project coordinator must take appropriate steps to inform them about the project and seek their views, and secure approval where necessary.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	Appendix 15
Findings - Round 1	<p>This criterion was confirmed at validation. However, the audit team was unable to find verifiable evidence that the Annual Project Management Workshops have taken place each year during the most recent monitoring period.</p> <p>The audit team notes that during the site visit the audit team will interview different staff members of Live and Learn Fiji to better understand their capacity, limitations, and community engagement.</p>
Round MCAR/mCAR/OFI	1 MCAR: Please provide meeting minutes or another form of verifiable evidence that the management workshops have taken place.
Round 1 Response from Project Proponent	Stakeholder assessment was confirmed at validation. The project management workshops were to be internal (for participants). It was not proposed that they include an updated stakeholder assessment. Please refer to Finding #21 for further information regarding project management meetings.
Findings - Round 2	Pending Closing of finding in Row 21 of the Findings Log. This item is addressed.

Item Number	5
Plan Vivo Standard 2013 Section	3. Project coordination and management

Plan Vivo Standard 2013 (Subsection and Description)	3.10. A project budget and financial plan must be developed by the project coordinator and updated at least every three months, including documentation of operational costs and PES disbursed, and funding received, demonstrating how adequate funds to sustain the project have been or will be secured.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	Drawa 2017-2019-Annual Report
Findings - Round 1	<p>The audit team located the Annex 4. operating budget BFCC annual operating budget for carbon project in the 2017-2019 Annual Report; however, this budget does not appear to be up-to-date as the budget includes Ranger salaries for 4 rangers but the actual number of rangers as described in the annual report is 9 rangers.</p> <p>The audit team notes that during the site visit the audit team will interview rangers to better understand pay structure.</p>
Round 1 MCAR/mCAR/OFI	MCAR: Please provide verifiable evidence that this criterion has been satisfied.
Round 1 Response from Project Proponent	There is an understanding between the mataqalis (clans) that ranger work will be rotated / spread between rangers from each different clan. Hence although there is budget for 4 rangers @ 2 days per week, in reality it would be performed by some of the 9 (or more) rangers from the various mataqali depending on their availability when work is occurring. Ranger work is also intermittent - hence it is not performed at 4 x 2 rangers days per week, but intensively for periods (e.g. during monitoring) and less at other times. This has emerged as the preferred way of working for rangers so that they can retain the flexibility for other work (paid and unpaid). Other paid work includes seasonal labor during the sugar cane harvesting season. Unpaid work includes subsistence gardening.
Findings - Round 2	Thank you for the clarification. The audit team also confirmed that this was the arrangement with the rangers during the site visit interviews. This finding is closed.

Item Number	6
Plan Vivo Standard 2013 Section	3. Project coordination and management
Plan Vivo Standard 2013 (Subsection and Description)	3.11. The project coordinator must keep records of all plan vivos submitted by participants, PES agreements, monitoring results and all PES disbursed to participants.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PD Part A Section 7.2

Findings - Round 1	<p>The audit team was unable to locate the raw data demonstrating that monitoring was carried out as described in the PDD.</p> <p>The audit team notes that during the site visit the audit team will interview rangers to ensure their understanding of the monitoring requirements and better understand the monitoring activities carried out during the monitoring period.</p>
Round MCAR/mCAR/OFI	1 MCAR: Please provide any raw data associated with the monitoring that has taken place in during this monitoring period e.g., GPS tracks, notes, etc.
Round 1 Response from Project Proponent	<p>The forest rangers conducted transects and boundary inspections for forest change in the EFAs as described in the PD, however did not complete the monitoring every six months. This is due to the challenging terrain and safety which requires intense resources and time to monitor every boundary. Nakau will update the frequency of which the eligible forest and eligible forest area needs to be monitored. Rangers collected data about biodiversity, management sites and other sites of interest as the PDD indicates but it can be improved and since the monitoring, they have had further Avenza training. The PD describes monitoring the forest in section 8.1.2. There was no timber harvesting, as such no dendrochronology was recorded and the areas of suspected forest change were analysed with the satellite imagery. The raw data from avenza and the forest transects has been shared, see folder 'Responses with Spatial data' within the 'Response to findings' folder.</p>
Findings - Round 2	<p>Appendix 3 to the PD Part B describes the forest change monitoring that took place during 2019-2020, which includes pictures of rangers in the field and maps of monitoring tracks. Additionally, GIS files containing raw data for 2019-2020 survey transects and points were provided.</p> <p>During the site visit the audit team confirmed that the rangers have been trained and understood the SOPs. Additionally, the audit team confirmed that the rangers have been implementing the monitoring as described in the PDD.</p> <p>However, Appendix 3 does not describe the monitoring conducted by rangers in during the other years of the monitoring period i.e. 2015, 2016, 2017, and 2018. The VVB is requesting additional detail in the MR that describes when and what monitoring specifically occurred during the monitoring period.</p>
Round MCAR/mCAR/OFI	2 MCAR: Please add additional detail to the MR to fully describe the monitoring activities that occurred during the monitoring specifically in relation to the activities described in Table 3.1.6 of the MR. MCAR: Please provide as much evidence as possible supporting the additional statements in the MR related to the MCAR above.

Round 2 Response from Project Proponent	Section 4 (new section 4.1) of the Monitoring Report has been updated to describe monitoring that occurred. The detailed description of monitoring activities and results resides in Annex 3, however this annex forms part of the Monitoring Report. Justifications for the methodology deviations are available in 2.2.1 of the MR. This includes change of monitoring frequency from six monthly to annually. In the future, the Live & Learn Fiji and DBFCC rangers aim to improve the monitoring procedures and data collection. In the years prior (2015, 2016, 2017 and 2018), monitoring was conducted on an adhoc basis with minimal and low quality data recorded. The project was not validated until 2018 and the funding for the rangers to conduct the monitoring was reliant on the carbon credit sales. In 2018, at 1st verification, a simplified monitoring report was completed. The simplified monitoring report is a sufficient requirement and inline with the PD Part B Section 8.1.5 "Simplified Project Monitoring Report - Carbon."
Findings - Round 3	Sections 2.2.1 and 4.1 of the MR now include detail and explanation of the monitoring that took place during the monitoring period. The MR now explains that simplified monitoring of the EFA occurred in 2015-2018 due to insufficient funding and that no quality data was collected. More comprehensive monitoring started in 2019 and results along with GPS tracks are reported in Appendix 3 of the MR. In the future, the project proponent plans to conduct annual monitoring of the EFA instead of biannual, as this is more relastic for the area. Additionally, the MR now explains changes to the remote sensing data used for monitoirng the project area. It is not expected that these methodology deviations will materially affect the project. This item is closed.

Item Number	7
Plan Vivo Standard 2013 Section	4. Participatory design and development of plan vivos
Plan Vivo Standard 2013 (Subsection and Description)	4.1. A voluntary and participatory planning process must take place to identify project interventions that address local needs and priorities and inform the development of technical specifications, taking into consideration:
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PD Part A, Drawa Forest Conservation Project 2nd Socio-economic impact survey 2020

Findings - Round 1	<p>The audit team found no evidence to suggest that the participatory design described in the validated PD Part A is not being followed. Based on the Drawa Forest Conservation Project 2nd Socio-economic impact survey 2020 it was noted that an increasing number of people in the project owner group feel there needs to be better dissemination of project information from the DBFCC specifically related to financial statements.</p> <p>The audit team notes that during the site visit the community members will be interviewed to gauge if they are able to receive information about the project.</p>
Round MCAR/mCAR/OFI	<p>1 MCAR: Please provide verifiable evidence that this issue will be addressed.</p> <p>MCAR: Please provide the raw data for the Drawa Socio-impact survey 2020.</p>
Round 1 Response from Project Proponent	<p>We acknowledge the results of the survey regarding the need for increased efforts in dissemination of information - this is being addressed through increased engagement between the DBFCC and LLEE with participant communities. However we also note that the Plan Vivo condition 4.1 refers to participation in development of Plan Vivos and Technical Specifications - this planning process was participatory but was completed and addressed at validation. No new Technical Specification or Plan Vivo is introduced at 2nd verification and no further consultation of Technical Specification has occurred. The raw data from the Socio-economic survey has been uploaded into the folder 'Response to findings' under the sub-folder 'social impact survey data'</p>
Findings - Round 2	<p>The raw data for the 2020 social impact survey was provided to the audit team. Many of the participants reference the MGM meetings as ways of receiving information about the project.</p> <p>During the site visit the community expressed that they were informed about the project and most often got information about the project from the mataqali representative on the DBFCC Executive Committee or other community leaders. This finding is closed.</p>

Item Number	8
Plan Vivo Standard 2013 Section	4. Participatory design and development of plan vivos
Plan Vivo Standard 2013 (Subsection and Description)	4.7. The project coordinator must not approve plan vivos where implementation would undermine the livelihood needs and priorities or reduce the food security of participants.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	Drawa Forest Conservation Project 2nd Socio-economic impact survey 2020

Findings - Round 1	The audit team reviewed the Drawa Forest Conservation Project 2nd Socio-economic impact survey 2020 and noted that substantially more households reported running out of food than in the baseline. The survey report states that this was not due to the project activity but no clear reason is stated as to why this occurs. The audit team notes that during the site visit the community members will be interviewed to better understand this problem and specifically whether the project is a cause of this issue.
Round 1 MCAR/mCAR/OFI	MCAR: Please clarify for the audit team how the increase in the number of households who run out of food is unrelated to the project.
Round 1 Response from Project Proponent	The survey findings suggest that average income had increased (\$311 to \$537), and average size of garden had also increased (1.1 ha to 1.8Ha). If the project were to impact negatively on food security it would be expected to be related to reduced income or reduced land availability for gardening - neither of which is observed. Reduced area for gardening is not expected because the eligible areas lie outside of the agricultural reserves. Decreased income due to the project is not expected or observed, because it is additional to other sources of income earned in the social impact baseline. The most likely reason for food insecurity is adverse weather impact on garden productivity (e.g. severe weather event), noting that the project site experienced a cyclone and flooding event during the project period.
Findings - Round 2	The audit team did not find evidence that food scarcity is a result of project activities during the site visit. This finding is closed.

Item Number	9
Plan Vivo Standard 2013 Section	4. Participatory design and development of plan vivos
Plan Vivo Standard 2013 (Subsection and Description)	4.8. There must be a system for accurately recording and verifying the location, boundary and size of each plan vivo using GPS, where boundary coordinates are recorded for all plan vivos above 5 hectares, and at least a central point coordinate recorded for plan vivos under 5 hectares.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	MR, Spatial Files
Findings - Round 1	The audit team reviewed the EFA boundary shapefile provided and noted that the area of the EFA stated in the PDD does not match the size of the EFA in the shapefiles. Additionally, the audit team was unable to find shapefiles showing the strata (logged vs unlogged forest) and shapefiles showing the area outside the EFA but still owned by the various communities. The audit team notes that boundaries will need to be verified during the

	site visit.
Round MCAR/mCAR/OFI	1 MCAR: Please clarify the discrepancy noted in the finding. MCAR: Please provide the requested shapefiles.
Round 1 Response from Project Proponent	Following up on your findings we realized that the wrong shape file for EFA boundaries had been used in the monitoring report. To be sure we had the correct shapefiles we have obtained another copy from TLTB for the Drawa lease area (the EFAs) and updated maps accordingly. The discrepancy in EFA area is described separately in the document 'EFA area deviation justification' located in the 'Response to Findings' folder. The area we monitored was slightly larger than the correct EFA area, and mostly encompasses the correct EFA boundaries. There were 2 areas where the correct EFA boundary was slightly outside of the area monitored, however in both cases these areas are remote from access and villages and propose no risk. In the majority of cases we have monitored an additional buffer around the area that needed to be protected. We do not possess and have no ability to obtain shapefiles of the logged and unlogged forest strata. However a list (and size) of previously logged coupes was shared by the Department of Forestry for areas previously logged within the EFA / Coupe boundaries and this was verified at validation (is contained in the validated PD). The shapefiles for the EFA boundaries/TLTB Lease area has been updated and is available in the Response to Findings, Spatial Files, TLTB Lease Area EFA Boundary Folder.
Findings - Round 2	The document titled 'EFA area deviation justification' explains the reason for the discrepancy in areas between the PD and the current MR which is related to the development of new shapefiles for the project area. The TLTB shapefile areas for the EFA boundaries now match the EFA areas included in the MR. This finding is closed.

Item Number	10
Plan Vivo Standard 2013 Section	4. Participatory design and development of plan vivos
Plan Vivo Standard 2013 (Subsection and Description)	4.9. Participants must have access to their plan vivo in an appropriate format and language.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	MR
Findings - Round 1	<p>It is unclear to the audit team if this criterion has been satisfied.</p> <p>The audit team notes that during the site visit the community members will be interviewed to ensure this criteria is satisfied.</p>

Round 1 MCAR/mCAR/OFI	MCAR: Please provide verifiable evidence that this criterion has been satisfied.
Round 1 Response from Project Proponent	The 'Plan Vivo' for the project is the 'Drawa Block Conservation Management Plan' as per PD Part A pp. 96. The accessibility (e.g. suitability of language) was assessed and confirmed at validation. The Conservation Management Plan has not changed since project inception.
Findings - Round 2	The Drawa Block Conservation Management Plan was provided to the audit team as Appendix 1 to the PD Part A and during the site visit the audit team confirmed via interviews that communities have access to the Management Plan in their own language.

Item Number	11
Plan Vivo Standard 2013 Section	4. Participatory design and development of plan vivos
Plan Vivo Standard 2013 (Subsection and Description)	4.12. Participants must be provided with a forum, or facilitated to use existing forums, to periodically discuss the design and running of the project with other participants in their community, and raise any issues or grievances with the project coordinator over the PES period.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PD Part A and Drawa 2017-2019 Annual Report
Findings - Round 1	<p>The audit team reviewed the Annual report and the detailed descriptions of the meetings that were held during the most recent monitoring period. However, the audit team notes that the Annual report annual meetings were only held in 2017, 2018, 2019. It is unclear why there was not an annual meeting held in 2016 and 2020.</p> <p>The audit team notes that during the site visit the community members will be interviewed to ensure this criteria is satisfied.</p>
Round 1 MCAR/mCAR/OFI	MCAR: Please clarify in-line with the finding.
Round 1 Response from Project Proponent	Regular engagement with DBFCC and communities occurred in 2016, however meeting data is not available. As explanation - EU funded project development activities until December 2015. There was less support for the Fiji based team in 2016 due to funding constraints, During this period project visits continued, but some record keeping lapsed. Support was increased in 2017 with GIZ funding, and in 2018 the project was supported by PVC sales finance (as per evidence already provided). A report "Drawa Meetings Summary - 2020" has been added to the 'Response to findings' folder on Dropbox and provides evidence that regular engagement on project design / implementation continued in 2020.
Findings - Round 2	Pending Closing of finding in Row 21 of the Findings Log.

Item Number	12
Plan Vivo Standard 2013 Section	5. Quantifying and monitoring ecosystem services
Plan Vivo Standard 2013 (Subsection and Description)	5.9.1. Performance indicators and targets to be used and how they demonstrate if ecosystem services are being delivered. Performance targets may be directly or indirectly linked to the delivery of ecosystem services, e.g. based on successful implementation of management activities or other improvements but must serve to motivate participants to sustain the project intervention
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PD Part B Section 8
Findings - Round 1	<p>The audit team reviewed the monitored parameters for Carbon, Community, and Biodiversity and noted the following:</p> <ol style="list-style-type: none"> 1. The results of the monitoring requirements for the carbon elements conducted during the most recent monitoring period do not appear to be stated in the MR. Additionally, the audit team was unable to find verifiable evidence such as GPS tracks, notes/observations, transect, transects monitored each year, et. 2. The PDD states that the eligible forest area will be monitored biannually; however, during this monitoring period the boundary monitoring occurred only annually due to the large size of the project area. The audit team is reasonably assured that this Methodology Deviation will not materially affect the project. 3. The audit team was unable to locate the results of the activity shifting leakage inspection and de-minimis timber harvest inspection.
Round MCAR/mCAR/OFI	<p>1 MCAR: Please clarify where the results of the monitoring as it relates to the carbon elements are stated in the MR or add the results of the carbon monitoring to the MR.</p> <p>MCAR: Please provide verifiable evidence that the annual monitoring of carbon elements was conducted and associated reports.</p> <p>MCAR: Please provide the results of the Activity Shifting leakage inspection and the de-minimis timber harvest inspection.</p>

Round 1 Response from Project Proponent	<p>Evidence that monitoring was conducted is found in the Appendices share folder; Appendix 3 Drawa Forest Change Monitoring Report 2015 - 2020 (now updated) and within a new folder "Data & evidence to support Appendix 3." This includes monitoring of the Eligible Forest Areas (EFAs) via remote sensing and ranger inspections (transects and boundary inspections). Comprehensive monitoring was conducted only once in the monitoring period (hence there is one report). This is due to available resources (i.e. until first issuance was completed in 2018, there was little finance available to support the comprehensive monitoring). However local forest inspections were conducted throughout this period, but did not generate reportable data. The first comprehensive monitoring activity (and report) represents the commencement of the annual monitoring effort that can now be sustained because financing through credit sales has commenced. This includes pre-orders for 60k credits from the next issuance, thus ensuring availability of resources. The monitoring occurred at the end of the period, hence shows that the carbon stocks and ERs are as reported to 2020. A new section has been added to the forest change monitoring report entitled "Monitoring in 'Protection Forest Zone' for Total Activity Shifting Leakage." Nakau conducted a remote sensing exercise using spatial imagery in 2016 and 2020 of the Protection Forest Area owned by project owners and demonstrated that the forest has not changed nor been subject to commercial timber harvesting. As such, no leakage has occurred and the total activity shifting leakage value is 0 tonnes for the monitoring period. A response to De-minimis timber harvesting inspection is found below in the response to Finding 49.</p>
Findings - Round 2	<p>Thank you for the clarification. Currently, there is insufficient detail within the MR that accurately reflect the monitoring that occurred during this monitoring period. Please add additional detail to describe what monitoring activities occurred, additional context as to why the monitoring did not occur in line with the PDD, and how the Monitoring Plan will be implemented in the future.</p>
Round MCAR/mCAR/OFI	<p>2 MCAR: Please clarify in line with the finding.</p>
Round 2 Response from Project Proponent	<p>Section 4 (new section 4.1) of the Monitoring Report has been updated to describe monitoring that occurred. The detailed description of monitoring activities and results resides in Annex 3, however this annex forms part of the Monitoring Report. Justifications for the methodology deviations are available in 2.2.1 of the MR. This includes change of monitoring frequency from six monthly to annually. In the future, the Live & Learn Fiji and DBFCC rangers aim to improve the monitoring procedures and data collection. In the years prior (2015, 2016, 2017 and 2018), monitoring was conducted on an adhoc basis with minimal and low quality data recorded. The project was not validated until 2018 and the funding for the rangers to conduct the monitoring was reliant on the carbon credit sales. In 2018, at 1st verification, a simplified monitoring report was completed. The simplified monitoring report is a sufficient requirement and inline with the PD Part B Section 8.1.5 "Simplified</p>

	Project Monitoring Report - Carbon."
Findings - Round 3	Sections 2.2.1 and 4.1 of the MR now include detail and explanation of the monitoring that took place during the monitoring period. The MR now explains that simplified monitoring of the EFA occurred in 2015-2018 due to insufficient funding and that no quality data was collected. More comprehensive monitoring started in 2019 and results along with GPS tracks are reported in Appendix 3 of the MR. In the future, the project proponent plans to conduct annual monitoring of the EFA instead of biannual, as this is more realistic for the area. Additionally, the MR now explains changes to the remote sensing data used for monitoring the project area. It is not expected that these methodology deviations will materially affect the project. This item is closed.

Item Number	13
Plan Vivo Standard 2013 Section	5. Quantifying and monitoring ecosystem services
Plan Vivo Standard 2013 (Subsection and Description)	5.9.8. How results of monitoring will be shared and discussed with participants
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PD Part B Section 8.1.8.2, MR Section 3.1.8.2
Findings - Round 1	<p>Section 8.1.8.2 states that "Community monitoring outputs are recorded in annual Project Management Reports prepared and approved by Serthiac with the assistance of the Project Coordinator. Project Management Reports are submitted for approval to the Project Coordinator and the Programme Operator on an annual basis." However, the audit team was unable to find these reports.</p> <p>The audit team notes that during the site visit the audit team will interview community members to ensure that monitoring results are being shared appropriately.</p>

Round MCAR/mCAR/OFI	1	MCAR: Please clarify in line with the findings.
Round 1 Response from Project Proponent		We have noted an error in the PDD, where it says "Serthiac" it should say DBFCC. The annual Management meetings (and resultant reports) were not held as originally proposed in the PDD. In lieu of this, LLEE conducted regular engagement visits with the DBFCC and its members. The DBFCC also held AGMs as required by their registration under the Cooperative Act, and these served to engage the DBFCC on a similar agenda that was intended for a management meeting. As a group we decided that this was sufficient because each meeting is logistically challenging and expensive, requiring travel from all villages, regional towns and the capital (Suva). AGM minutes from 2017, 2018, 2019, 2020 & 2021 are located in the 'Response to findings' folder: "DBFCC AGM." Note that some of these are recorded in Fijian.
Findings - Round 2		<p>Thank you for the clarification. It is unclear to the audit team if the Project Management Reports were developed as described in the PDD. It is unclear to the audit team if the Project Management reports have been prepared and approved by DBFCC.</p> <p>Additionally, the VVB notes that the these changes to project monitoring and meeting requirements are not accurately described within the MR.</p>
Round MCAR/mCAR/OFI	2	MCAR: Please clarify in line with the findings and provide the Project Management Reports.
Round 2 Response from Project Proponent		<p>The DBFCC (landowner cooperative) did not prepare written 'project management reports' to present at annual 'project management meetings.' This includes the once per verification cycle 'project monitoring meeting' that was to replace the usual project management meeting. In lieu of this the DBFCC held Annual General Meetings (AGMs) which is required under the Cooperative Act. These served to engage the DBFCC membership on a similar agenda as was intended for a management meeting. Formal project management reports were not prepared for 'approval.' However, the DBFCC executive tabled and presented financial and project management information at the AGMs. Nakau considered the AGMs to be sufficient to achieve the project management meeting purpose with respect to engaging members on land use, governance, benefit sharing, transparency and accountability. However, we will work with the DBFCC to improve their capacity to produce project management reports in the future. The information (above) has been added to section 2.2.2 Project Description Deviations under the sub-heading "Project management reports and meetings." The Project Monitoring Meeting was to happen once each monitoring cycle as a special Project Management Meeting. It was to include sharing the draft MR report with the DBFCC. In all other aspects the Monitoring Meeting / Report is the same as the Project Management Meeting / Report, and hence the above statement applies. The DBFCC were provided with copies of the draft MR Report to share with members outside of formal meetings.</p>

Findings - Round 3	Section 2.2.2 of the MR now includes a deviation for this and states that the Annual General Meetings (AGMs) were held in place of the Project Management Workshops originally described in the PDD. There were no Project Management Reports prepared, but AGM minutes for 2017-2020 were provided. This item is addressed.
---------------------------	--

Item Number	14
Plan Vivo Standard 2013 Section	6. Risk management
Plan Vivo Standard 2013 (Subsection and Description)	6.2. Projects must review their risk assessment at least every 5 years and resubmit to the Plan Vivo Foundation.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	
Findings - Round 1	The audit team was unable to find an updated risk assessment.
Round MCAR/mCAR/OFI	1 MCAR: Please provide and updated risk assessment in line with this criterion.
Round 1 Response from Project Proponent	The updated 2020 -21 Drawa Risk Management Framework has been added to the 'Response to findings folder.'
Findings - Round 2	An updated Risk Management Framework has been provided by the Project Proponent. It includes possible social risks, financial risks, health and safety risks, and risks to permanence as well as mitigation procedures for each risk. This item is addressed.

Item Number	15
Plan Vivo Standard 2013 Section	8. PES Agreements (transacting ecosystem services) and benefitsharing
Plan Vivo Standard 2013 (Subsection and Description)	8.2.1. The quantity and type of ecosystem services transacted
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PD Part A and PES agreement.
Findings - Round 1	The audit team was unable to find a signed copy of the PES agreement by all parties. Section 1.1 of the PES agreement specifies the approximate number of PES units delivered each year. 18,800 per year for the first 15 years and 10,294 per year for the last 15 years.
Round MCAR/mCAR/OFI	1 MCAR: Please provide a copy of the signed PES agreement.

Round 1 Response from Project Proponent	The signed PES agreement has been added to the key project documents folder
Findings - Round 2	The PES agreement signed by Live & Learn and the Drawa Block Forest Communities Cooperative has been provided. This item is addressed.

Item Number	16
Plan Vivo Standard 2013 Section	8. PES Agreements (transacting ecosystem services) and benefit sharing
Plan Vivo Standard 2013 (Subsection and Description)	8.5.2. A proven track record in identifying funders or buyers in ecosystem markets or from other sources
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	
Findings - Round 1	The audit team understands the Nakau Programme has sold PVC's from this project that were earned during the previous monitoring period. However, the audit team was unable to find a detailed breakdown of all costs and revenues from the sale and disbursement of revenues from PVC sales.
Round 1 MCAR/mCAR/OFI	MCAR: Please provide a detailed breakdown of the project financials. Specifically, the audit team is requesting a detailed breakdown on when PVCs were sold and how much they were sold for.
Round 1 Response from Project Proponent	The requested detailed breakdown of project financials has been added to the 'Response to findings' folder - see "Drawa Sales and payments Workbook October 2021"
Findings - Round 2	The audit team reviewed the Drawa Sales and Payments workbook provided. The PES agreement states that DBFCC will be responsible for paying TLTB \$2.00 per credit sold. It is unclear to the audit team if the Total Amount paid to DBFCC (cell D15 in the DBFCC payments tab of the Drawa sales and payments workbook October 2021) includes this \$2.00/credit payment or if this amount excludes it.
Round 2 MCAR/mCAR/OFI	MCAR: Please clarify in line with the finding.
Round 2 Response from Project Proponent	Total Amounts paid to DBFCC in the project period include \$2 compensation payment to TLTB. We have prepared a supporting worksheet which shows the details of whole amounts paid to DBFCC and subsequent compensation payments made to TLTB as per the PES Agreement. The TLTB Payment Worksheet can be found in the Response to Findings folder or by this link https://nakau.sharepoint.com/:x/s/DRAWA-Drawa2ndverificationsharefolder/Ea_T1u-qXMhFqffPlyw9MWEBI5nAJiih7Jk4sT7x9gzqzw?e=PD1Vs

Findings - Round 3	The audit team reviewed the TLTB Payment Worksheet which shows the \$2.00/credit payments to TLTB included in the DBFCC payments. This item is addressed.
---------------------------	---

Item Number	17
Plan Vivo Standard 2013 Section	8. PES Agreements (transacting ecosystem services) and benefit sharing
Plan Vivo Standard 2013 (Subsection and Description)	8.10. The project coordinator must provide justification for any payments for ecosystem services delivered in kind or in the form of equipment or resources other than money.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PD Part A and PES agreement.
Findings - Round 1	It is unclear to the audit team if these payments to communities have been delivered "in-kind or in the form of equipment or resources other than money".
Round MCAR/mCAR/OFI	1 mCAR: Please clarify in line with the finding.
Round 1 Response from Project Proponent	Thank you for the clarification. The audit team understands that these were not in-kind payments. This finding is closed.

Item Number	18
Plan Vivo Standard 2013 Section	8. PES Agreements (transacting ecosystem services) and benefit sharing
Plan Vivo Standard 2013 (Subsection and Description)	8.12. Projects selling Plan Vivo Certificates should aim to deliver at least 60% of the proceeds of sales on average to communities as PES, meaning project coordinators should not draw on more than 40% of sales income for ongoing coordination, administration and monitoring costs. Where less than 60% is delivered projects must justify why this is not possible, why the benefits delivered to communities are fair and that they are able to effectively incentivise activities.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PD Part A, PES Agreement, Drawa 2nd Issuance Request
Findings - Round 1	The audit team noted that DBFCC was only allocated 58% of revenue from the sale of credits. It is unclear why they were allocated less than 60% of the proceeds of sales.
Round MCAR/mCAR/OFI	1 MCAR: Please clarify how the project satisfies these criteria in line with the finding.

Round 1 Response from Project Proponent	The original version of the signed PES agreement provided in the 'key project documents' folder 'old Drawa PES Agreement v 1.1' was approved by Plan Vivo at validation and allowed for less than 60% of benefits to be transferred to DBFCC. The PES agreement was subsequently updated (changed to 60%) as per the PES agreement provided for the current audit. The signed copy of the new PES agreement is also in the key documents folder (V1.3 signed). The original agreement was based on DBFCC receiving a fixed price per credit (see p.20). The distribution of less than 60% was based on a rationale of covering costs that are incurred by the Project Coordinator (Live & Learn) and Nakau. We changed the agreement when we felt Nakau and LLEE were in a position to carry the costs and reach the target (aim) of 60% to landowners. This was applied to all sales since June 2019 including the first high volume sale.
Findings - Round 2	The audit team was unable to find the old PES agreement in the provided documents.
Round 2 MCAR/mCAR/OFI	2 MCAR: Please provide the old PES agreement.
Round 2 Response from Project Proponent	The older PES Agreement has been attached in the "Response to Findings Folder." The file name is <i>Drawa PES Agreement D1.3 v1.1 20170905.docx</i> Unfortunately we could not locate a signed version - it has been superseded by the current signed PES agreement.
Findings - Round 3	The audit team confirms that the old PES agreement allowed a fixed price per credit to be dispersed. The current version (signed June 2019) of the PES agreement states that 60% of carbon sales will go to the DBFCC. The workbook titled "TLTB Payment Worksheet" shows that starting in June 2019, 60% of the revenue from carbon sales were allocated to the DBFCC and TLTB. This item is addressed.

Item Number	19
Nakau Programme: Nakau Methodology Framework: D2.1 v1.0, 20140428 (Section)	3.1.3 Transparent Participation

Plan Vivo Standard 2013 (Subsection and Description)	The Project Owner is required to establish a governance structure enabling compliance with Section 4.4 of the Plan Vivo Standard (2013). This includes: 1. The establishment of a 'Formation Group' to initiate the project coPdesign and coP development process 2. The registration of a legally constituted 'Project Owner' group with a mandate to coP manage the project (with the Project Coordinator) on behalf of the land/resource rights holders. 3. The legally constituted 'Project Owner' group must be owned by or accountable to the land/resource rights holders of the project area (i.e. the land/resource rights holders must become its members or shareholders). 4. The establishment of a Project Governing Board/Committee within the legally constituted 'Project Owner' with a mandate to govern the project on behalf of the land/resource rights holders.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PD Part A 3.1.3.4
Findings - Round 1	The audit team was unable to locate the "quarterly Money Story" activities that were held during the most recent monitoring period. The audit team notes that community members will be interviewed regarding the Money Story activities during the site visit.
Round 1 MCAR/mCAR/OFI	MCAR: Please provide copies of the "Quarterly Money Stories" that were held during the most recent monitoring period.
Round 1 Response from Project Proponent	The DBFCC were required to provide a financial report or "money story" with each claim for payment, which was to be quarterly. Some payments were withheld until the DBFCC provided the financial report and invoice. Sample's (x4) of the money story financial reports are provided in the "Response to Findings" folder in Dropbox.
Findings - Round 2	The audit team reviewed the evidence provided by the project and confirms that these money story events have occurred as stated. This finding is closed.

Item Number	20
Nakau Programme: Nakau Methodology Framework: D2.1 v1.0, 20140428 (Section)	3.1.7 Project Management Workshops
Plan Vivo Standard 2013 (Subsection and Description)	The purpose of Project Management Workshops is to provide an annual update on project progress pursuant to the requirements of the PES agreements and PD. Project Management Workshops take place within six months of the end of each (annual) Project Management Period

Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PDD, Annual Reports
Findings - Round 1	<p>The audit team reviewed the PDD and annual reports and noted that there do not appear to be annual reports for 2015 and 2016.</p> <p>Additionally, the audit team found no evidence that mandatory project management workshops have taken place.</p> <p>The audit team notes that these Project Management Workshops will be discussed with communities during the site visit.</p>
Round MCAR/mCAR/OFI	<p>1 MCAR: Please provide the annual reports for 2015 and 2016.</p> <p>MCAR: Please provide verifiable evidence in the form of meeting minutes, attendance sheets, etc. that the project management workshops have taken place.</p>
Round 1 Response from Project Proponent	<p>Annual reports were not completed in 2015 & 16, noting that the project did not 'reach the market' until 2018 which put some limits on implementation activities. The 2017 annual report was accepted by Plan Vivo as the first annual report as stated on the 2017 Annual Report (p4). The annual Management meetings (and resultant reports) were not held as originally proposed in the PDD. In lieu of this, LLEE conducted regular engagement visits with the DBFCC and its members. The DBFCC also held AGMs as required by their registration under the Cooperative Act, and these served to engage the DBFCC on a similar agenda that was intended for a management meeting. See further detail in the response to Finding #13</p>
Findings - Round 2	<p>Thank you for the clarification. As the 2017, report was accepted by PV, it is understood that PV is allowing the first annual report to encompass 2015 and 2016.</p> <p>This 2nd MCAR is pending as it relates to other findings. AGM minutes were provided. This item is addressed.</p>

Item Number	21
Nakau Programme: Nakau Methodology Framework: D2.1 v1.0, 20140428 (Section)	3.1.7 Project Management Workshops

Plan Vivo Standard 2013 (Subsection and Description)	Key outputs of Project Management Workshops are approval of Project Management Reports and Project Business Reports. The authors of the Project Management Report and Project Business Report (e.g. Project Coordinator and individuals within the Project Owner community) shall send these reports to the Project Owner committee no less than 8 working days prior to the Project Management Workshop.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PDD, Annual Reports
Findings - Round 1	The audit team was unable to located the Project Management Reports and Project Business Reports.
Round MCAR/mCAR/OFI	1 MCAR: Please provide the Project Management Reports and Project Business Reports.
Round 1 Response from Project Proponent	The annual Management meetings (and resultant reports) were not held as originally proposed in the PDD. In lieu of this, LLEE conducted regular engagement visits with the DBFCC and its members. The DBFCC also held AGMs as required by their registration under the Cooperative Act, and these served to engage the DBFCC on a similar agenda that was intended for a management meeting. See further detail in the response to Finding #13
Findings - Round 2	The audit team understands that the Annual Project Management Workshops and Project Management Reports were not completed as required by the PDD. However, the MR it states "Community monitoring outputs are recorded in annual Project Management Reports prepared and approved by the Project Owner with the assistance of the Project Coordinator. Project Management Reports are submitted for approval to the Project Coordinator and the Programme Operator on an annual basis. The Project Coordinator collates the content of annual Project Management Reports into three-yearly Project Monitoring Reports. The Project Owner and the Project Coordinator approves each Project Monitoring Report before being submitted to the Programme Operator for approval. Once approved by the Programme Operator the Project Monitoring Report is submitted for a verification audit." Although the audit team understands that the Project Management Workshops were not held as described it is unclear why the Project Management Reports were not written, submitted, and approved. Additionally, it is unclear if the Project Monitoring Workshops (to take place once every monitoring period) were completed for the previous monitoring period and this monitoring period.
Round MCAR/mCAR/OFI	2 MCAR: Please clarify in line with the findings. MCAR: Please add additional detail to the MR as to allow the reader to understand which monitoring meets, workshops, and reports were completed and not completed in line with the requirements of the PDD.

Round 2 Response from Project Proponent	The DBFCC (landowner cooperative) did not prepare written 'project management reports' to present at annual 'project management meetings.' This includes the once per verification cycle 'project monitoring meeting' that was to replace the usual project management meeting. In lieu of this the DBFCC held Annual General Meetings (AGMs) which is required under the Cooperative Act. These served to engage the DBFCC membership on a similar agenda as was intended for a management meeting. Formal project management reports were not prepared for 'approval.' However, the DBFCC executive tabled and presented financial and project management information at the AGMs. Nakau considered the AGMs to be sufficient to achieve the project management meeting purpose with respect to engaging members on land use, governance, benefit sharing, transparency and accountability. However, we will work with the DBFCC to improve their capacity to produce project management reports in the future. The information (above) has been added to section 2.2.2 Project Description Deviations under the sub-heading "Project management reports and meetings." The Project Monitoring Meeting was to happen once each monitoring cycle as a special Project Management Meeting. It was to include sharing the draft MR report with the DBFCC. In all other aspects the Monitoring Meeting / Report is the same as the Project Management Meeting / Report, and hence the above statement applies. The DBFCC were provided with copies of the draft MR Report to share with members outside of formal meetings.
Findings - Round 3	Section 2.2.2 of the MR now includes a deviation for this and states that the Annual General Meetings (AGMs) were held in place of the Project Management Workshops originally described in the PDD. There were no Project Management Reports prepared, but AGM minutes for 2017-2020 were provided. The VVB is issuing a Forward Action Request (FAR) that at the next time of verification the project provides an update on the capacity building for DBFCC to complete the project management reports.

Item Number	22
Nakau Programme: Nakau Methodology Framework: D2.1 v1.0, 20140428 (Section)	3.1.8 Project Monitoring Workshops
Plan Vivo Standard 2013 (Subsection and Description)	The purpose of Project Monitoring Workshops is to evaluate and approve Project Monitoring Reports at the conclusion of each Project Monitoring Period (as specified in the Technical Specifications applied). Project Monitoring Workshops take place within one year of the end of each Project Monitoring Period.
Applicability to the Project (Y or N/A)	Y

Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PD, Annual Reports
Findings - Round 1	<p>The audit team was unable to locate the Project Monitoring Reports.</p> <p>The audit team notes that during the site visit the community members will be interviewed regarding their access to project documents, specifically outputs from the annual monitoring.</p>
Round 1 MCAR/mCAR/OFI	MCAR: Please provide the Project Monitoring Reports.
Round 1 Response from Project Proponent	<p>The Project Monitoring Meeting was to be held once in each Monitoring / verification period. For 2nd Verification it was decided to hold the DBFCC AGM in lieu of the proposed "Project Monitoring Meeting" as this was a requirement under the Cooperatives Act. We decided to forego an additional Project Monitoring Meeting due to the high cost and logistics, and because of the duplication, because the AGM provided a forum for Cooperative members to hear project updates and engage with the project. Nakau staff could not be present due to Covid travel restrictions. The AGM was attended by 64 DBFCC cooperative members representing all clans and the women's and youth groups. A copy of the signed AGM attendee list and AGM agenda and financial report is now provided in the "Response to Findings" folder. Please note that one of the attendance sheets is wrongly labelled 26/2/2020 (hand written), the date of the AGM was in fact 26/2/2021.</p>
Findings - Round 2	<p>Thank you for the clarification. The audit team reviewed the evidence provided that demonstrated the AGM meetings were held. Additionally, during the site visit no community members interviewed said they were unable to access information about the project. Additionally, many of them said that they received information about the project monitoring and implementation through word of mouth or conversations with the leaders of the mataqali. Additionally, the audit team is current reviewing the project monitoring report.</p> <p>It is unclear to the audit team if the project monitoring report has been shared with the DBFCC Executive Committee.</p>
Round 2 MCAR/mCAR/OFI	MCAR: Please clarify in line with the finding.
Round 2 Response from Project Proponent	See information provided above
Findings - Round 3	Section 2.2.2 of the MR now includes a deviation for this and states that the Annual General Meetings (AGMs) were held in place of the Project Management Workshops originally described in the PDD. There were no Project Management Reports prepared, but AGM minutes for 2017-2020 were provided. This item is addressed.

Item Number	23
--------------------	----

Nakau Programme: Nakau Methodology Framework: D2.1 v1.0, 20140428 (Section)	4.2.7 Programme Operator Fees
Plan Vivo Standard 2013 (Subsection and Description)	The Programme Operator may receive payments from the Project Trust Account for provision of services as agreed within the Programme Agreement. Project Coordinators shall also pay a license fee to the Programme Operator. The fee is required to cover administrative costs incurred by the Programme Operator relating to quality controls and support of Project Coordinators, and sustaining the integrity of the Nakau Programme.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PD, Drawa Programme Agreement
Findings - Round 1	<p>The audit team was unable to find a detailed breakdown of the financials related to the project for example, disbursements to the project coordinator, programme operator, and project owners. A detailed breakdown financial breakdown will allow the audit team the ability to ensure fees are being administered correctly.</p> <p>The audit team notes that during the site visit multiple questions will be asked to community participants about whether they have received funds and how these funds are used.</p>
Round 1 MCAR/mCAR/OFI	MCAR: Please provide a detailed breakdown of project financials.
Round 1 Response from Project Proponent	The requested detailed breakdown of project financials has been added to the 'Response to findings' folder - see "Drawa Sales and payments Workbook October 2021" This shows disbursements to the Programme Operator (Nakau), Project Coordinator (LLEE), and Project Owner (DBFCC). Information showing expenditures and disbursements by DBFCC to the Cooperative members is shown in the sample Money Story reports (x4) in the 'Response to findings' folder.
Findings - Round 2	Thank for providing the workbook. This finding is closed.

Item Number	24
Nakau Programme: Nakau Methodology Framework: D2.1 v1.0, 20140428 (Section)	4.2.10 Financial Discipline and Transparency

Plan Vivo Standard 2013 (Subsection and Description)	The Programme Operator must produce the following reports every quarter based upon Project Trust Account activity: a. Cash Flow b. Profit & Loss c. Balance Sheet
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	
Findings - Round 1	The audit team was unable to locate the files necessary to satisfy this criteria.
Round 1 MCAR/mCAR/OFI	MCAR: Please provide files referenced in this criteria.
Round 1 Response from Project Proponent	Financial statements were prepared to report the Trust Account Balance and funds held on behalf of the Project Owner on an ad hoc, or as required basis. The intention of the prescribed reporting cycle was to ensure financial transparency which was subsequently realised through other means such as the regular supply of trust account bank statements, presentation at DBFCC meetings and supply of detailed sales information recorded in the Sales and Payments Workbook. It was determined that the level of detail required to periodically prepare Profit and Loss, Balance Sheet and Cashflow Reports based on transactions in the Trust Account was unnecessary and subsequently not material to Project Owner decision making.
Findings - Round 2	Thank you for the clarification. However, the audit team was unable to find a deviation for these requirements in the MR.
Round 2 MCAR/mCAR/OFI	MCAR: Please clarify in line with the finding.
Round 2 Response from Project Proponent	A paragraph has been added to MR Section 2.2.2 Project Description Deviation under the sub-heading "Financial reporting", as follows: "The PD stated that the Programme Operator (Nakau) would prepare quarterly Profit and Loss, Balance Sheet and Cashflow Reports based on transactions in the Trust Account. The purpose of this activity was to ensure transparency and accountability of PES funds held in trust for the Project Owner. However, the frequency for reporting and the types of reports was deemed to be too rigid and unnecessary to achieve the outcome. It was determined that financial information could be shared with Project Coordinator and Project Owner parties in other formats more conducive for communication of financial concepts. Information such as trust account bank statements, presentations at DBFCC meetings and detailed sales information was frequently shared with the Project Owner on an ad hoc, or as required basis."
Findings - Round 3	Thank you for including this as a deviation in the MR. Section 2.2.2 of the MR now explains why financial documents were not prepared as stated in the PD, but rather on an as needed basis to the Project Coordinator. This item is addressed.

Item Number	25
Nakau Programme: Nakau Methodology Framework: D2.1 v1.0, 20140428 (Section)	4.2.10 Financial Discipline and Transparency
Plan Vivo Standard 2013 (Subsection and Description)	The Programme Operator shall also document any further operational costs of the project that are financed separately from the Project Trust Account.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	
Findings - Round 1	The audit team was unable to locate the files necessary to satisfy this criterion.
Round 1 MCAR/mCAR/OFI	MCAR: Please provide financial files that satisfy this criterion.
Round 1 Response from Project Proponent	There were no further operational costs of the project that are financed separately from the Project Trust Account, hence none are reported. The statement of account has been added to the "Response to findings" folder. As evidence we could only download data from the Drawa Trust Account from the bank website going back to 01 November 2019 (see 'Response to findings folder.') However monthly statements are available on request. These show that the only expenditures in the Drawa Trust Account are a) bank fees, b) payments to DBFCC, c) payments to LLEE, and d) payments to Nakau, as executed under the PES Agreement.
Findings - Round 2	Thank you for the clarification. This finding is closed.

Item Number	26
Nakau Programme: Nakau Methodology Framework: D2.1 v1.0, 20140428 (Section)	4.3 PROJECT OWNER BUSINESS MODEL
Plan Vivo Standard 2013 (Subsection and Description)	Projects in the Nakau Programme shall develop a Project Owner Business Plan that is consistent with Sections 8.8 to 8.13 of the Plan Vivo based on the Project Owner Business Model described in this section. The Community Benefit Sharing Plan (which could be a section of the Project Owner Business Plan or a stand-alone document) shall also comply with Sections 3.13 to 3.15 of the Plan Vivo Standard.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	

Findings - Round 1	The audit team was unable to find the Project Owner Business Plan. The audit team notes that during the site visit interviews with community members and DBFCC.
Round 1 MCAR/mCAR/OFI	MCAR: Please address in line with the finding.
Round 1 Response from Project Proponent	The DBFCC Business Plan has been added to the "Key project documents" folder on Dropbox. The budgets in the business plan are updated from time to time - but separately to the plan.
Findings - Round 2	Thank you for providing the DBFCC Business Plan. This finding is closed.

Item Number	27
Nakau Programme: Nakau Methodology Framework: D2.1 v1.0, 20140428 (Section)	4.3 PROJECT OWNER BUSINESS MODEL
Plan Vivo Standard 2013 (Subsection and Description)	Table 4.3
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	
Findings - Round 1	The audit team was unable to find verifiable evidence to ensure these rules were followed during the most recent monitoring period.
Round 1 MCAR/mCAR/OFI	MCAR: Please address in line with the finding.
Round 1 Response from Project Proponent	The DBFCC has set up and operate the accounts required under the business model, and produce quarterly financial reports 'money stories' that are sent to Nakau with their request for payments. Nakau provides feedback to DBFCC via LLEE aiming to incrementally improve the recording keeping and reporting. The DBFCC are asked to provide further information for clarification if needed. For the most recent tranche payment the DBFCC were asked to share their bank account statements to verify their money story reports. These provide evidence that the required bank accounts are set up and operating. The bank account statements have been added to the "Response to findings folder," in the sub-folder "Evidence of DBFCC bank accounts."
Findings - Round 2	Thank you for providing the additional evidence. This finding is closed.
Item Number	28
Nakau Programme: Nakau Methodology Framework: D2.1 v1.0, 20140428 (Section)	4.3.3.1 Calculating the Business Money target:

Plan Vivo Standard 2013 (Subsection and Description)	The Project Owner business must retain sufficient cash to enable it to keep performing its roles and responsibilities (defined in the PES agreement) until further income is received.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	
Findings - Round 1	Please provide evidence that satisfies this criteria.
Round 1 MCAR/mCAR/OFI	MCAR: Please address in line with the finding.
Round 1 Response from Project Proponent	The Project Owner business has retained sufficient cash to enable it to keep performing its roles and responsibilities until quarterly income has been received. This is evidenced in the Quarterly Financial reports received and consolidated in Project Profit and Loss which can be found in "Response to findings folder," in the sub-folder "DBFCC Financial_Money Story Reports"
Findings - Round 2	Thank you for the clarification. The VVB reviewed the DBFCC Money Story reports and confirmed that this criterion is satisfied. This finding is closed.

Item Number	29
Nakau Programme: Nakau Methodology Framework: D2.1 v1.0, 20140428 (Section)	4.3.3.1 Calculating the Business Money target:
Plan Vivo Standard 2013 (Subsection and Description)	The minimum target balance of the Business Money Account <i>must be equal to or greater than one years operating expenses (i.e. the project owners annual operating budget)</i> . This balance must be achieved before money can be allocated for other uses.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	
Findings - Round 1	Please provide evidence that satisfies this criteria.
Round 1 MCAR/mCAR/OFI	MCAR: Please address in line with the finding.

Round 1 Response from Project Proponent	The minimum target balance of the Business Money Account was lower than equal to or higher than one years operating expenses due to higher costs in other areas of the business. It has been determined that a more appropriate buffer amount is equal to or greater than one Quarter operational costs and is sufficient in respect of this metric. We can confirm that the balance of one quarter operational costs has been achieved before money has been allocated for other uses. If require we seek a PD Deviation in order to reduce the cash balance required from an annual to a quarterly amount.
Findings - Round 2	Thank you for the clarification. The VVB reviewed the DBFCC Money Story reports and confirmed that this criterion is satisfied. This finding is closed.

Item Number	30
Nakau Programme: Nakau Methodology Framework: D2.1 v1.0, 20140428 (Section)	4.3.4 'Safety Money' Account
Plan Vivo Standard 2013 (Subsection and Description)	'Safety Money' refers to the portion of the profit (i.e. after Business Money is removed) that must be set-aside in a separate bank account as a financial buffer to ensure that the registered Project Owner Group remains financially viable. This includes having sufficient cash reserves to cover unforeseen costs, losses or delays in receiving payments.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	
Findings - Round 1	Please provide evidence that satisfies this criteria.
Round 1 MCAR/mCAR/OFI	MCAR: Please address in line with the finding.
Round 1 Response from Project Proponent	The DBFCC has maintained sufficient liquidity throughout the project period in terms of 'Safety Money', and an average cash balance of 16,776 FJD which is representative of their quarterly operations costs. The average net surplus percentage (as a proportion of revenue) is 9%. A supporting workpaper 'Consolidated Project Profit & Loss' has been prepared based on the Quarterly Financial Reports supplied by the DBFCC and is added to "Response to findings folder," in the sub-folder "DBFCC Financial_Money Story Reports",
Findings - Round 2	Thank you for the clarification and additional documentation. The audit team reviewed the additional evidence and confirmed this requirement is satisfied. This finding is closed.
Item Number	31

Nakau Programme: Nakau Methodology Framework: D2.1 v1.0, 20140428 (Section)	4.3.7 Financial Controls
Plan Vivo Standard 2013 (Subsection and Description)	<p>Project Owners participating in the Nakau Programme are required to establish transparent and accountable systems for financial controls. This must include:</p> <ul style="list-style-type: none"> a. Establishment of 5 accounts: <ul style="list-style-type: none"> i. Project Operating Account ii. Business Money Account iii. Safety Money Account iv. Group Benefit Account v. Dividend Account b. Minimum of 3 signatories on each Account c. Signatories on all accounts approved by the Project Governing Board. d. Establishment of a daily transfer limit for each account.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	
Findings - Round 1	Please provide evidence that satisfies this criteria.
Round 1 MCAR/mCAR/OFI	MCAR: Please address in line with the finding.
Round 1 Response from Project Proponent	All bank accounts have been appropriately maintained and in alignment to the agreed 'Money Story' method. Bank statements for each of these accounts are supplied and the bank account statements have been added to the "Response to findings folder," in the sub-folder "Evidence of DBFCC bank accounts."
Findings - Round 2	The audit team reviewed the additional evidence and confirmed that the required accounts have been established. This finding is closed.

Item Number	32
Nakau Programme: Nakau Methodology Framework: D2.1 v1.0, 20140428 (Section)	4.3.8 Book Keeping and Reporting
Plan Vivo Standard 2013 (Subsection and Description)	A suitably skilled bookkeeper must be appointed by the Project Owner to maintain accurate and up-to-date records of expenditure from the Project Operating Account. The book- keeper must create an expenditure and cash flow report that must be provided to the Project Governing Board and the Project Coordinator at least quarterly (although more frequent reporting is encouraged).
Applicability to the Project (Y or N/A)	Y

Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	
Findings - Round 1	<p>Please provide information about the book-keeper(s) during the most recent monitoring period and the quarterly cash flow reports.</p> <p>The audit team notes that during the site visit the audit team will interview DBFCC and employees of the Project Owner group.</p>
Round 1 MCAR/mCAR/OFI	MCAR: Please address in line with the finding.
Round 1 Response from Project Proponent	Information regarding personnel capability has been added to the 'Response to Findings' folder
Findings - Round 2	The audit team reviewed the additional evidence provided and confirmed this requirement is satisfied.

Item Number	40
Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	3. Determining The Baseline Scenario
Plan Vivo Standard 2013 (Subsection and Description)	3. Determining The Baseline Scenario
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	MR Chapter 4
Findings - Round 1	The baseline will be reviewed as a baseline revision is required. Chapter 4 of the MR states that a review of recent literature and new laws has not resulted in any changes to the baseline. The audit team noted that in Part C of the Drawa 2nd Verification Issuance Request document the total area is noted as 1,548.45; however, in the PD Part B the eligible forest area is reported as 1,396 ha of Logged Forest and 327 ha of Unlogged forest for a total area of approximately 1,723. The audit team does not understand the discrepancy.
Round 1 MCAR/mCAR/OFI	MCAR: Please clarify the discrepancy between the two different numbers found for the eligible forest area.
Round 1 Response from Project Proponent	The discrepancy in EFA area is described separately in the document 'EFA area deviation justification' located in the 'Response to Findings' folder.

Findings - Round 2	Thank you for the clarification, the audit team reviewed the methodology deviation and believes it is appropriate as a more accurate number is presented. The VVB confirmed the calculation of the new EFA. This finding is closed.
---------------------------	---

Item Number	41
Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	3. Determining The Baseline Scenario
Plan Vivo Standard 2013 (Subsection and Description)	Only areas that have been designated, sanctioned or approved for such activities (e.g. where there is legal sanction to harvest wood) by the national and/or local regulatory bodies are eligible for crediting under this methodology.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	MR Section 4.1.1
Findings - Round 1	The audit team notes that the Maximum allowable slope parameter that determines where a forest can be cut has been changed in the most recent Fiji Harvesting code. The audit team was unable to find a demonstration that shows that the operable harvest area has not changed as a result of the updated harvesting code language. Additionally, the audit team was unable to locate the original Appendix 5, the harvest rate justification.
Round MCAR/mCAR/OFI	1 MCAR: Please provide a demonstration that the new updated language governing operable forest area has not impacted the harvest rate. MCAR: Please provide the original Harvest Rate Justification report.
Round 1 Response from Project Proponent	The table comparing parameters from the logging code of practice documents in the monitoring report may not have been clear. It has been updated with the direct quoted statements from 2010 and 2013 (current) code of practice reports. The statements in each case are identical: "Felling should not occur where average slopes exceed 25o over a distance of 100 metres or more unless approved by a Forest Practices Officer and measures are taken to avoid erosion and environmental harm." Hence there is no change. The code of logging practice documents have been added to the 'Response to findings folder' for reference.
Findings - Round 2	Thank you for the clarification, this finding is closed. The 80% harvest rate is still valid as there have been no updates to the

	Fiji Harvesting Code. This finding is closed.
--	---

Item Number	42
Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	4.1.1 Step 1- Harvest Rate (HR)
Plan Vivo Standard 2013 (Subsection and Description)	The “Harvest Rate” (HR) corresponds to the component of an Annual Logging Plan that specifies the annual harvest rate for each land parcel within the Project Area for Rotation 1. The HR is measured in m ³ per year.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	
Findings - Round 1	<p>The audit team was unable to locate the Harvest Justification report that is needed for the baseline revision.</p> <p>The MR states that no baseline revision has occurred, however the validated harvest rate is not applied in Appendix 1.</p>
Round 1 MCAR/mCAR/OFI	<p>MCAR: Please provide the updated Harvest justification report.</p> <p>MCAR: Please clarify in line with the findings.</p>

Round 1 Response from Project Proponent	The harvest rate was established at 80% at project validation, citing the Forest Decree 1992 and Fiji Forest Policy 2007. The harvest rate applied in appendix 1 for this monitoring period is unchanged at 80%. I.e. in Appendix 1, Drawa carbon sheet, we apply the harvest rate of 80% column D. We maintain that there is no need to provide an updated harvest justification report because there are no changes to legislation or forest policy since validation. The Fiji Forest Act 2016 is available online as the Bill introduced to Fiji Parliament to commence 'on the date or dates appointed by the Minister by notice published in the Gazette.' However the Bill has not been passed and is yet to be Gazetted. Please see the Fiji Department of Forestry website http://www.forestry.gov.fj/legis.php for the list of current legislation. In addition, the yet to come into force Fiji Forest Act 2016 Section (20) allows that all existing licences issued under the Forest Decree 1992 for the purposes of felling or extracting timber shall remain valid under this Act until its expiry, suspension or revocation in accordance with section 26 of this Act. I.e. the new Act if commenced in its current form would have had no impact on changing the baseline harvest rate or other licence conditions for a logging licence established under the project baseline @ project commencement (2015).
Findings - Round 2	This was confirmed at validation. The 80% harvest rate is still valid as there have been no updates to the Fiji Harvesting Code. This finding is closed.

Item Number	43
Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	4.1.2 Step 2- Total Wood Harvested (TWH)
Plan Vivo Standard 2013 (Subsection and Description)	4.1.2 Step 2- Total Wood Harvested (TWH)
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	MR, Carbon Quantification Workbook
Findings - Round 1	It is unclear why this parameter does not match the value of the parameter in the validated PDD.
Round MCAR/mCAR/OFI	1 MCAR: Please clarify in line with the finding.

Round 1 Response from Project Proponent	The TWH is a different value because the size of the EFAs were reduced when the Drawa Conservation lease was approved (after the PDDs were assessed for validation). The EFA area was reduced at validation, for reasons explained in Finding 40 (above). Hence the TWH refers to the sheet "Drawa Areas" Cells S62 to S69, which relate to the proportionate decrease in size of the eligible areas (and hence proportionate reduction in TWH). The validation / 1st verification auditor did not request an update to the PDDs but just required a change to the carbon accounting in Appendix 1 and monitoring report.
Findings - Round 2	Thank you for the clarification, the audit team confirms this calculation is done appropriately.

Item Number	44
Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	4.1.5 Step 5- Below Ground Biomass Emitted (BGBE)
Plan Vivo Standard 2013 (Subsection and Description)	4.1.5 Step 5- Below Ground Biomass Emitted (BGBE)
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	MR, Carbon Quantification Workbook
Findings - Round 1	It is unclear why this parameter does not match the value of the parameter in the validated PDD.
Round 1 MCAR/mCAR/OFI	MCAR: Please clarify in line with the finding.
Round 1 Response from Project Proponent	BGBE is calculated from an equation that derives from the TWH. Please refer to the answer to Finding 43 (above) for an explanation for the change to TWH value, which in turn accounts for the difference in BGBE. The validation / 1st verification auditor did not request an update to the PDDs but just required a change to the carbon accounting in Appendix 1 and monitoring report.
Findings - Round 2	Thank you for the clarification, the audit team confirms this calculation is done appropriately.

Item Number	45
--------------------	----

Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	4.1.7 Step 7- Gross Total Emissions in tCO2e (GTCO2)
Plan Vivo Standard 2013 (Subsection and Description)	4.1.7 Step 7- Gross Total Emissions in tCO2e (GTCO2)
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	
Findings - Round 1	It is unclear why this parameter does not match the value of the parameter in the validated PDD.
Round 1 MCAR/mCAR/OFI	MCAR: Please clarify in line with the finding.
Round 1 Response from Project Proponent	GTCO2 is calculated from an equation that derives from the TWH. Please refer to the answer to Finding 43 (above) for an explanation for the change to TWH value, which in turn accounts for the difference in GTCO2. The validation / 1st verification auditor did not request an update to the PDDs but just required a change to the carbon accounting in Appendix 1 and monitoring report.
Findings - Round 2	Thank you for the clarification, the audit team confirms this calculation is done The carbon fraction applied using Equation 4.1.7b does not appear to be correct.
Round 2 MCAR/mCAR/OFI	MCAR: Please clarify in line with the finding and if necessary update the carbon quantification workbook and all downstream calculations.

Round 2 Response from Project Proponent	<p>Changes to Appendix 2 Drawa Carbon Accounting 2021: Gross Total Emissions (Cell D9) has been updated with correct wood carbon fraction value of 0.49 (IPCC 2006, ch.4, table 4.3), leading to a change in GTCO2 from 19,800 to 21,560. All downstream calculations have been modified accordingly.</p> <table border="1"> <thead> <tr> <th>Changes to Drawa</th><th>PD</th><th>Part B:</th><th>PES</th><th>Accounting:</th></tr> </thead> <tbody> <tr><td>Chapter 4.1.1, p.</td><td>30:</td><td>Harvesting</td><td>rate</td><td>updated</td></tr> <tr><td>Chapter 4.1.2, p.</td><td>31:</td><td>TWH</td><td></td><td>updated</td></tr> <tr><td>Chapter 4.1.3, p</td><td>31:</td><td>CD</td><td></td><td>updated</td></tr> <tr><td>Chapter 4.1.4, p.</td><td>31:</td><td>AGBE</td><td></td><td>updated</td></tr> <tr><td>Chapter 4.1.5, p.</td><td>31:</td><td>BGBE</td><td></td><td>updated</td></tr> <tr><td>Chapter 4.1.6, p.32:</td><td></td><td>TM3</td><td></td><td>updated</td></tr> <tr><td>Chapter 4.1.7, p.32:</td><td></td><td>GTCO2</td><td></td><td>updated</td></tr> <tr><td>Chapter 4.1.8, p.32:</td><td></td><td>GBER1</td><td></td><td>updated</td></tr> <tr><td>Chapter 4.1.9, p.32:</td><td></td><td>ItWPR1</td><td></td><td>updated</td></tr> <tr><td>Chapter 4.1.10, p.33: NBEARx updated, Balance unlogged forest</td><td></td><td></td><td></td><td>updated</td></tr> <tr><td>Chapter 5.1.1, p.35:</td><td></td><td>ER</td><td></td><td>updated</td></tr> <tr><td>Chapter 5.3.1, p.38:</td><td></td><td>NPR</td><td></td><td>updated</td></tr> <tr><td>Chapter 5.4.1, pp. 38-39: BUFNBEAR and BUFNPRR</td><td></td><td></td><td></td><td>updated</td></tr> <tr><td>Chapter 5.5.1, p.39:</td><td></td><td>NCCRx</td><td></td><td>updated</td></tr> <tr><td>Chapter 6.1, p.40: EFA and PHH</td><td></td><td></td><td></td><td>updated</td></tr> <tr><td>Chapter 6.4.1, p.41: GHH</td><td></td><td></td><td></td><td>updated</td></tr> <tr><td>Chapter 6.4.2.p.41: BUFHH</td><td></td><td></td><td></td><td>updated</td></tr> <tr><td>Chapter 6.4.3, p.41: NHH</td><td></td><td></td><td></td><td>updated</td></tr> <tr><td>Chapter 6.4.4., p.41: NCCE</td><td></td><td></td><td></td><td>updated</td></tr> <tr><td>Chapter 6.4.5; p.42: NCC/HH updated</td><td></td><td></td><td></td><td></td></tr> </tbody> </table>	Changes to Drawa	PD	Part B:	PES	Accounting:	Chapter 4.1.1, p.	30:	Harvesting	rate	updated	Chapter 4.1.2, p.	31:	TWH		updated	Chapter 4.1.3, p	31:	CD		updated	Chapter 4.1.4, p.	31:	AGBE		updated	Chapter 4.1.5, p.	31:	BGBE		updated	Chapter 4.1.6, p.32:		TM3		updated	Chapter 4.1.7, p.32:		GTCO2		updated	Chapter 4.1.8, p.32:		GBER1		updated	Chapter 4.1.9, p.32:		ItWPR1		updated	Chapter 4.1.10, p.33: NBEARx updated, Balance unlogged forest				updated	Chapter 5.1.1, p.35:		ER		updated	Chapter 5.3.1, p.38:		NPR		updated	Chapter 5.4.1, pp. 38-39: BUFNBEAR and BUFNPRR				updated	Chapter 5.5.1, p.39:		NCCRx		updated	Chapter 6.1, p.40: EFA and PHH				updated	Chapter 6.4.1, p.41: GHH				updated	Chapter 6.4.2.p.41: BUFHH				updated	Chapter 6.4.3, p.41: NHH				updated	Chapter 6.4.4., p.41: NCCE				updated	Chapter 6.4.5; p.42: NCC/HH updated				
Changes to Drawa	PD	Part B:	PES	Accounting:																																																																																																						
Chapter 4.1.1, p.	30:	Harvesting	rate	updated																																																																																																						
Chapter 4.1.2, p.	31:	TWH		updated																																																																																																						
Chapter 4.1.3, p	31:	CD		updated																																																																																																						
Chapter 4.1.4, p.	31:	AGBE		updated																																																																																																						
Chapter 4.1.5, p.	31:	BGBE		updated																																																																																																						
Chapter 4.1.6, p.32:		TM3		updated																																																																																																						
Chapter 4.1.7, p.32:		GTCO2		updated																																																																																																						
Chapter 4.1.8, p.32:		GBER1		updated																																																																																																						
Chapter 4.1.9, p.32:		ItWPR1		updated																																																																																																						
Chapter 4.1.10, p.33: NBEARx updated, Balance unlogged forest				updated																																																																																																						
Chapter 5.1.1, p.35:		ER		updated																																																																																																						
Chapter 5.3.1, p.38:		NPR		updated																																																																																																						
Chapter 5.4.1, pp. 38-39: BUFNBEAR and BUFNPRR				updated																																																																																																						
Chapter 5.5.1, p.39:		NCCRx		updated																																																																																																						
Chapter 6.1, p.40: EFA and PHH				updated																																																																																																						
Chapter 6.4.1, p.41: GHH				updated																																																																																																						
Chapter 6.4.2.p.41: BUFHH				updated																																																																																																						
Chapter 6.4.3, p.41: NHH				updated																																																																																																						
Chapter 6.4.4., p.41: NCCE				updated																																																																																																						
Chapter 6.4.5; p.42: NCC/HH updated																																																																																																										
Findings - Round 3	The audit team reviewed the updated calculations and confirmed that this item is closed.																																																																																																									

Item Number	46
Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	4.1.8 Step 8 - Gross Baseline Emissions For Rotation 1 (GBER1)
Plan Vivo Standard 2013 (Subsection and Description)	4.1.8 Step 8 - Gross Baseline Emissions For Rotation 1 (GBER1)
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	

Findings - Round 1	It is unclear why this parameter does not match the value of the parameter in the validated PDD.
Round 1 MCAR/mCAR/OFI	MCAR: Please clarify in line with the finding.
Round 1 Response from Project Proponent	GBER1 is calculated from an equation that derives from the TWH. Please refer to the answer to Finding 43 (above) for an explanation for the change to TWH value, which in turn accounts for the difference in GBER1. The validation / 1st verification auditor did not request an update to the PDDs but just required a change to the carbon accounting in Appendix 1 and monitoring report.
Findings - Round 2	Thank you for the clarification, the audit team confirms this calculation is done appropriately.

Item Number	47
Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	4.1.7 Step 9 – Sequestration into Long Term Wood Products for Rotation 1 (ItWPR1)
Plan Vivo Standard 2013 (Subsection and Description)	4.1.7 Step 9 – Sequestration into Long Term Wood Products for Rotation 1 (ItWPR1)
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	
Findings - Round 1	It is unclear why this parameter does not match the value of the parameter in the validated PDD.
Round 1 MCAR/mCAR/OFI	MCAR: Please clarify in line with the finding.
Round 1 Response from Project Proponent	(Note: this is actually step 9). ItWPR1 is calculated from an equation that derives from the total eligible forest area size in Ha. The EFA area was reduced at validation, for reasons explained in Finding 40 (above). Please refer to the answer to Finding 43 (above) for an explanation for the change to TWH value, which in turn accounts for the difference in ItWPR1. The validation / 1st verification auditor did not request an update to the PDDs but just required a change to the carbon accounting in Appendix 1 and monitoring report.
Findings - Round 2	Thank you for the clarification. The audit team confirmed the new values (resulting from upstream quantification change of the EFA) have been applied correctly.

Item Number	48
--------------------	----

Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	4.1.10 Step 10 – Step 10 - Net Baseline Emissions For Rotation 1 (NBEr1)
Plan Vivo Standard 2013 (Subsection and Description)	4.1.10 Step 10 – Step 10 - Net Baseline Emissions For Rotation 1 (NBEr1)
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	
Findings - Round 1	It is unclear why this parameter does not match the value of the parameter in the validated PDD.
Round 1 MCAR/mCAR/OFI	MCAR: Please clarify in line with the finding.
Round 1 Response from Project Proponent	(Note this should refer to NBEAR1). NBEAR1 is calculated from an equation that derives from the TWH. Please refer to the answer to Finding 43 (above) for an explanation for the change to TWH value, which in turn accounts for the difference in NBEAR1. The validation / 1st verification auditor did not request an update to the PDDs but just required a change to the carbon accounting in Appendix 1 and monitoring report.
Findings - Round 2	Thank you for the clarification, the audit team confirms this calculation is done appropriately.

Item Number	49
Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	5.2.2 Step 14 - Total Market Leakage (TML)
Plan Vivo Standard 2013 (Subsection and Description)	This Technical Specifications Module follows the GreenCollar IFM LtPF v1.0 VCS approved Methodology VM0010 (2011) for calculating Total Market Leakage (TML).
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y

Evidence Used to Assess	PD Part B, Monitoring Report Section 4.3, Drawa Forest Change Monitoring Report
Findings - Round 1	<p>The audit team reviewed the project documents. As stated in the PD all land by the project owners has been enrolled in the in the carbon project and thus there is no potential for the activity shifting leakage.</p> <p>It is unclear to the audit team where the demonstration for market shifting leakage is located that uses the reference Green Collar methodology.</p> <p>The audit team noted that no demonstration has been made that the deforested areas in the Eligible Forest Area is below the de minimis threshold.</p>
Round 1 MCAR/mCAR/OFI	<p>MCAR: Please provide a demonstration that the deforestation is below the de-minimis threshold.</p> <p>MCAR: Please provide a detailed market leakage analysis in line with the Green Collar Methodology.</p>
Round 1 Response from Project Proponent	<p>In the forest change report, Nakau identified an area that has been subject to forest conversion, where a small area has been converted for an agricultural garden. The area is right on the edge of the Nakasea EFA boundary and at the time of monitoring, the area converted was approximately 1.2 hectares. The area of the site could be inaccurate due to the low resolution of the imagery, complex geographies and low temporal revisit time. However, it is unlikely that the extent of the disturbance would qualify as a reversal because it is significantly below the “de minimis threshold” for customary use of trees that is allowed and accounted for. De minimis timber harvesting is defined as lower than 5% of the total allowable annual commercial timber harvest volume for the equivalent rotation. The de minimis threshold is 363m3 of timber annually. If logging of 100% of harvestable trees was to occur it would create losses of approximately 9.8m3 per hectare. Therefore, at this rate, approximately 37 Ha could be harvested annually (or 185 Ha over 5 years) before the de minimis threshold is exceeded. At an estimated 1.2 ha there is a very low risk that the observed disturbance would exceed the de minimis threshold and trigger a reversal, even when considering a realistic error margin. As such we argue that it is sufficient to use the relevant imagery rather than ground truthing as a satisfactory way to verify monitoring findings. The team also conducted a spatial analysis using satellite imagery from 2016 to 2020 in the Protection Forest Area as described in the PD and no commercial logging or timber harvesting was found to occur, forest lost only being shown in mountain areas and likely attributed to natural events or errors from imagery collection. As such, the project has not caused activity shifting leakage. See shifting activity leakage or market leakage.</p>

Findings - Round 2	<p>Thank you for the clarification. The audit team confirms that TML was validated to be 0 and there is no requirement within the methodology to update the market leakage analysis.</p> <p>Additionally, the audit team confirmed that deforestation that occurred in the project area is below the de-minimis threshold.</p>
---------------------------	--

Item Number	50
Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	5.4.1.2 Buffer Credits For Net Baseline Emissions Avoided
Plan Vivo Standard 2013 (Subsection and Description)	Equation 5.4.1a
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PD Part B, Monitoring Report
Findings - Round 1	<p>This was confirmed at validation; however, the audit team notes that this value is different than the validated value. Additionally, the audit team noted that the carbon values in the Validated PDD and Appendix 1 do not line up.</p>
Round 1 MCAR/mCAR/OFI	<p>MCAR: Please clarify why these number would differ. Specifically, why the values confirmed at validation are not applied.</p> <p>MCAR: Please clarify values in the validated PPD do not align with values found in Appendix 1.</p>
Round 1 Response from Project Proponent	<p>Buffer credits are calculated from an equation that derives from the TWH. Please refer to the answer to Finding 43 (above) for an explanation for the change to TWH value, which in turn accounts for the difference in Buffer credits. The validation / 1st verification auditor did not request an update to the PDDs but just required a change to the carbon accounting in Appendix 1 and monitoring report.</p>
Findings - Round 2	<p>Thank you for the clarification, the audit team confirmed this equation has been applied correctly.</p>

Item Number	51
--------------------	----

Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	5.5.1 Step 18 - Net Carbon Credits (NCCRx)
Plan Vivo Standard 2013 (Subsection and Description)	Equation 5.5.1
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PD Part B, Monitoring Report
Findings - Round 1	This was confirmed at validation; however, the audit team notes that this value is different than the validated value.
Round 1 MCAR/mCAR/OFI	MCAR: Please clarify why these number would differ. Specifically, why the values confirmed at validation are not applied.
Round 1 Response from Project Proponent	NCCRx is calculated from an equation that derives from the TWH. Please refer to the answer to Finding 43 (above) for an explanation for the change to TWH value, which in turn accounts for the difference in NCCRx. The validation / 1st verification auditor did not request an update to the PDDs but just required a change to the carbon accounting in Appendix 1 and monitoring report.
Findings - Round 2	Thank you for the clarification, the audit team confirmed this equation has been applied correctly.

Item Number	52
Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	6. Quantifying Project Habitat Hectare Enhancements
Plan Vivo Standard 2013 (Subsection and Description)	6. Quantifying Project Habitat Hectare Enhancements
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	Monitoring Report Section 5

Findings - Round 1	Although at the time of validation, Habitat Hectares were used. The use of habitat hectares has been abandoned as there is no market to sell these credits as stated in Section 5 of the MR. However, this change seems to deviate from the PD.
Round 1 MCAR/mCAR/OFI	MCAR: The audit team understands that any deviation from the PD should be included as a PD deviation.
Round 1 Response from Project Proponent	Agreed that we are not producing habitat hectares. Now included as a Meth deviation in the Monitoring report p. 12.
Findings - Round 2	Thank you for the clarification, the audit team confirmed the deviation has been added to the MR.

Item Number	53
Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	7.1.1 Harvest Rate (HR)
Plan Vivo Standard 2013 (Subsection and Description)	The core of the avoided emissions component of the baseline calculation is based on a conservative estimate of the timber volume to be logged in the baseline activity. This estimate is calculated conservatively on the basis of commercial timber volumes harvested in the baseline at 80% of the harvestable wood volume available.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	Monitoring Report, Appendix 1
Findings - Round 1	The audit team notes that the validated harvest rate in the PDD is not applied in Appendix 1. It is unclear why this discrepancy exists.
Round 1 MCAR/mCAR/OFI	MCAR: Please clarify why validated values are not used to estimate the carbon credits generated in this monitoring period.
Round 1 Response from Project Proponent	The same harvest rate of 80% is applied, however the EFA areas were changed at validation and first verification. Therefore the harvest rate is applied to a smaller EFA area and resulted in a lower figure for total wood harvest rate (TWH). Please refer to Finding 43 for further explanation.
Findings - Round 2	This was confirmed at validation. The 80% harvest rate is still valid as there have been no updates to the Fiji Harvesting Code. This finding is closed.

Item Number	54
--------------------	----

Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	8.1 Project Monitoring Plan
Plan Vivo Standard 2013 (Subsection and Description)	Project Monitoring reports will be produced using the latest VCS Monitoring Report Template at a maximum of 5-yearly intervals covering each Project Monitoring Period. The Project Monitoring Report will be produced in the year following the final year of the Project Monitoring Period.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	MR
Findings - Round 1	The VCS monitoring template does not appear to be used.
Round 1 MCAR/mCAR/OFI	MCAR: Please use the VCS MR template as specified in the methodology.
Round 1 Response from Project Proponent	We request a Methodology Deviation to use the Plan Vivo monitoring template, as this is more appropriate for a Plan Vivo project. We are using the same Monitoring template for this verification as for the first verification. It is also the same monitoring template used for the recently validated Babatana Project that applies the same methodology and technical specifications. See Monitoring report Meth deviation section p.11.
Findings - Round 2	The audit team confirmed the deviation has been added to the MR.

Item Number	55
Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	Table 8.1.1 Monitored and Non-Monitored Parameters
Plan Vivo Standard 2013 (Subsection and Description)	Notation: EFA Parameter: Eligible Forest Area Unit: ha Equation: Origin: PD/Timber Harvest Plan Monitored: Monitored
Applicability to the Project (Y or N/A)	Y

Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	MR Section 8.1.2
Findings - Round 1	<p>The audit team was unable to find evidence to verify that the EFA has been monitored appropriately.</p> <p>The audit team notes that this will need to be verified during the site visit.</p>
Round 1 MCAR/mCAR/OFI	MCAR: Please provide evidence demonstrating the monitoring was conducted in line with the PD.
Round 1 Response from Project Proponent	Pending closing of other findings relating to monitoring requirements.
Findings - Round 2	The audit team confirmed that the project has not been monitored in-line with the validated PDD due to a number of reasons. However, the on-the-ground monitoring is taking place, which is always supported by a remote sensing analysis to detect deforestation. The deviations in the monitoring requirements have been appropriately described and justified in the Monitoring Report. This item is closed.

Item Number	56
Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	5.1.1 Step 11 - Enhanced Removals (ER)
Plan Vivo Standard 2013 (Subsection and Description)	Equation 5.1.1b
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	PD Section 5.1.2
Findings - Round 1	<p>The audit team reviewed the PDD Section 5.1.2 and the carbon quantification workbook. Section 5.1.2 states "The stratification of the Project Area into Logged and Unlogged forest (i.e. regenerating and old-growth forest) is supported by data from the National Forest Inventory of 1995, which classified this area as being comprised of: Table 5.1.2." It is unclear to the VVB if the entire EFA is considered "Logged Forest" as defined in the technical specifications.</p> <p>Additionally, it is unclear to the VVB if the new additional hectarage added to the EFA is also considered "logged forest" as defined by the methodology.</p>

Round 1 MCAR/mCAR/OFI	
Round 1 Response from Project Proponent	
Findings - Round 2	
Round 2 MCAR/mCAR/OFI	
Round 2 Response from Project Proponent	We have updated the method used to estimate logged forest strata within the Drawa project site. The method uses a different data source that can be verified. The change results in a reduction in the logged forest area. The changes are described in detail in the Monitoring Report, Section 2.2.2 Project Description Deviations, under the subheading 'Logged forest strata' and 'Correction of project removals calculations.' The carbon accounting spreadsheet has also been updated accordingly. The new logged forest areas are in the PHI sheet table (cell P3). Columns F, G & H show forest condition in the PHI table. The new logged forest calculation method references Vletter & Mussong ; the report has been added to the 'Response to Findings Folder'
Findings - Round 3	Thank you for the clarification. The VVB reviewed the quantification and is reasonably assured that the quantification is accurate and in-line with the methodology. This item is closed.

Item Number	57
Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	Table 8.1.1 Monitored and Non Monitored Parameters
Plan Vivo Standard 2013 (Subsection and Description)	Notation: Parameter: Total Wood Harvested Unit: m ³ yr ⁻¹ Equation: Origin: Timber Harvest Plan Monitored: Not monitored Updated each Baseline Revision
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	MR Section 8.1.2
Findings - Round 1	Because the project area has changed as a result in an error in the files supplied to the Nakau Programme, which is appropriate, TWH has changed. These new values should be reported in the MR as the values in the PDD are no longer valid. Additionally, all downstream values have changed and the updated values should be reported for transparency.

Round 1 MCAR/mCAR/OFI	1	MCAR: Please report all values in the MR that have changed.
Round 1 Response from Project Proponent		
Findings - Round 2		
Round 2 MCAR/mCAR/OFI	2	
Round 2 Response from Project Proponent		<p>The MR has been updated to refer to a new version of the Drawa PD</p> <p>Part B: PES Accounting. We recommend that PD Part B is considered 'unchanged' from validation (Equations remain unchanged), however the data / values have changed due to the correction in the eligible project area, and due to changes to correct wood carbon fraction value (see finding 45, above). This response is preferred to including all changes in the MR, because the document would become too long.</p> <p>Chapter 4.1.1, p. 30: Harvesting rate updated Chapter 4.1.2, p. 31: TWH updated Chapter 4.1.3, p. 31: CD updated Chapter 4.1.4, p. 31: AGBE updated Chapter 4.1.5, p. 31: BGBE updated Chapter 4.1.6, p.32: TM3 updated Chapter 4.1.7, p.32: GTCO2 updated Chapter 4.1.8, p.32: GBER1 updated Chapter 4.1.9, p.32: ItWPR1 updated Chapter 4.1.10, p.33: NBEARx updated, Balance unlogged forest updated Chapter 5.1.1, p.35: ER updated Chapter 5.3.1, p.38: NPR updated Chapter 5.4.1, pp. 38-39: BUFNBEAR and BUFNPRR updated Chapter 5.5.1, p.39: NCCRx updated Chapter 6.1, p.40: EFA and PHH updated Chapter 6.4.1, p.41: GHH updated Chapter 6.4.2.p.41: BUFHH updated Chapter 6.4.3, p.41: NHH updated Chapter 6.4.4., p.41: NCCE updated Chapter 6.4.5:, p.42: NCC/HH updated</p>
Findings - Round 3		<p>Thank you for the clarification. The VVB confirmed via email communications with Caroline Stillman of Plan Vivo that it is appropriate for the PD to be updated to correct the error in the reporting of the Eligible Forest Area.</p>

Item Number	58
-------------	----

Technical Specifications Module (C) 1.1 (IFM9LtPF): Improved Forest Management – Logged to Protected Forest V1.0 for The Nakau Programme (Section)	General Quantification Findings
Plan Vivo Standard 2013 (Subsection and Description)	
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess	MR, PDD, Quantification Files
Findings - Round 1	
Round 1 MCAR/mCAR/OFI	
Round 1 Response from Project Proponent	
Findings - Round 2	
Round 2 MCAR/mCAR/OFI	
Round 2 Response from Project Proponent	
Findings - Round 3	The audit team reviewed the updated calculations and noted that Equation 4.1.10 does not appear to be applied in line with the methodology.
Round 3 MCAR/mCAR/OFI	MCAR: Please clarify in line with the finding and if necessary update all downstream calculations and reporting documents
Round 3 Response from Project Proponent	Equation 4.1.10 is now applied correctly, and all downstream calculations have been updated. This item is addressed.
Findings - Final	The VVB reviewed the updated quantification and confirmed that is correctly applied and in line with the applied methodology.