



Plan Vivo - Verification Statement

Submitted To: Plan Vivo

Verification Entity: Aster Global Environmental Solutions, Inc.

Issue Date: 31 January 2022

Lead Verifier: Shawn McMahon

GHG Project Plan: Pastures, Conservation and Climate Action, Mongolia

Aster Global Environmental Solutions, Inc. completed the first verification for the Pastures, Conservation and Climate Action, Mongolia and confirms that the project is in conformance with the Plan Vivo Standard (2013) and validated PD. The project is an Improved Pasture Management project as described in the validated PD. The project is implemented on approximately 53,660 hectares in central Mongolia. The GHG emission reductions and/or removals achieved during the monitoring period were evaluated to a reasonable level of assurance. During the verification a 5% materiality threshold was used. This verification covers the monitoring period 01 April 2015 – 31 March 2019. The total GHG emission reductions/removals during the monitoring period are 107,192 tCO₂e. A project buffer (10% or 20% depending on each project area) is applied, resulting in a total of 16,518 tCO₂e allocated to the Plan Vivo Buffer Pool during the 4-year monitoring period. The Total Emissions Reduction Tonne(s) (PVCs) verified during this verification were 90,674.

GHG Reductions or Removals	Units
Baseline Emissions	107,192
Project Emissions	0
Leakage	0
Uncertainty Deduction Rate	Uncertainty is deducted at the model level and a total uncertainty deduction rate is not applied, in line with the methodology.
Total Buffer Contribution	16,518

GHG emission removals total (tCO₂e)	107,192
Total Emission Reduction Tonne(s) (PVC)	90,674

Attestation:

Shawn McMahon

Lead Verifier (Print Name)



Lead Verifier (Signature)

Date: 31 January 2022

Barbara Toole O'Neil

Senior Internal Reviewer (Print Name)



Senior Internal Reviewer (Signature)

Date: 31 January 2022

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

Project Name:	Pastures, Conservation and Climate Action, Mongolia
Plan Vivo Project #	PV_2016_015
Aster Global Project Number:	21037.00
Report Issuance Date:	31 January 2022

Project Proponent	Mongolian Society for Range Management
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Verification Report

Name of Verifier(s)	Date of Review
Aster Global Environmental Solutions Inc.	30 March 2021 to 20 January 2022

Project Description

As stated in the Pastures, Conservation and Climate Action (PCCA), Mongolia PDD Part A: “The overall aim of the project is to enhance biodiversity conservation and herders’ livelihoods at sites in rural Mongolia, thus contributing to national efforts to combat degradation of ecosystem services (ES) and growing rural poverty, whilst protecting a globally important biodiversity heritage. The project is shaped by the wider context of climate change and the growing proliferation of formal and informal mining in the Mongolian countryside, with attendant impacts of pollution, loss of water sources, failure to meet (inter)national biodiversity targets and struggles over resource access. The specific project objectives are as follows:

- Through participatory analysis and valuation of ES, to facilitate the implementation of a sustainable, locally relevant PES (payment for ecosystem services) scheme (the first rangeland PES scheme in Mongolia).
- To promote wider awareness of Plan Vivo and voluntary carbon markets, amongst local herding communities and government policy makers, thus supporting the wider uptake of this approach in the future.
- To facilitate the wider spread of methodological innovations in the participatory valuation of ES, as developed during preparatory work for this project, and to embed a ‘carbon plus’ approach, under the new Plan Vivo standard.
- To make measurable, positive impacts on participating herder groups’ livelihoods, through facilitating access to carbon finance and through support of locally developed strategies for livelihood diversification, economies of scale, restoration of seasonal mobility and collaborative practices in herding.
- To facilitate recognition of customary knowledge, values and practices in conservation planning, including through links to national strategies for the development of Local Protected Areas (LPAs) and with positive measurable impacts on local biodiversity.”

The GHG assertion provided by the Pastures, Conservation and Climate Action, Mongolia project and verified by Aster Global has resulted in the GHG emission reductions or removals of 107,192 tCO₂ equivalents (CO₂e) by the project during the reporting/monitoring period (01 April 2015 – 31 May 2019). A buffer withholding (16,518 tCO₂e total) was allocated based on the 10% risk buffer for the Hongor Ovoo heseg and the 20% risk buffer for the Ikh Am and Dulaan Khairkhan hesegs specified in the methodology and leading to a PVC issuance of 90,674 tCO₂e.

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

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

Description of site visit: The primary objectives of the site visit as stated in the Plan Vivo Validation Terms of Reference (ToR) are to “Verify that the project’s physical site description and governance structure is as described in the project design document and technical specification(s)

- Identify objective evidence of conformance with each of the requirements in the Plan Vivo Standard by:
 - Interviewing and interacting with the project coordinator (in-country manager)
 - Interviewing relevant stakeholders such as participating householders, community members and leaders, local government officials, government forestry agencies and extension services and other projects working in the same area
 - Identifying and assessing available supplementary project documentation and tools e.g. planning documentation, databases, templates, legal agreements etc.
 - Cross-checking results from interviews with project documentation to ensure that documentation reflects ground realities and staff awareness of project goals and procedures.
- Fully understand the project context and the views of other local stakeholders and experts regarding the project’s likely impact and benefits”

Aster Global Environmental Solutions Inc (herein referred to as Aster Global) developed a site visit plan for the Pastures, Conservation and Climate Action, Mongolia 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, confirm the implementation of PCCA Mongolia project activities, and to identify possible sources of error to focus desktop verification efforts.

For the field sampling effort, direct measurement confirmation, 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. Survey locations were selected and sampled based on access, safety, and material risk to the project. 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 COVID-19 global pandemic, the core Aster Global audit team was unable to travel to Mongolia. However, the site visit was conducted in the conventional manner with interviews and observations performed by Aster Global’s in-country subcontractor, Batbuyan Batjav, from June 15 2021-June 19, 2021. Onsite interviews and informal discussions were conducted with The MSRM staff, contractors responsible for the implementation of the carbon accounting, and members of the Ikh Am heseg.

In addition to the interviews that were conducted on-site the VVB also conducted various site inspections of the project area to confirm project activities are being implemented as stated in the PDD and reported in the Annual Reports. The audit team visited multiple areas where project activities related to biodiversity conservation and socioeconomic activities are being implemented to confirm the data reported in the annual reports and described in the validated PDD. Additionally, the VVB independently collected a sample of data to ensure accuracy in the reported number of animals and herder movements.

List of individuals interviewed:

Individual	Affiliation	Role	Date
Prof. Dr. Dorligsuren Dulamsuren	MSRM	Executive Director	June 15, 2021 – June 19, 2021
Uilst Dorligsuren	MSRM		Multiple interviews over the course of the verification
Dr. Caroline Upton	University of Leicester	Responsible for Carbon Quantification	Multiple interviews over the course of the verification
Ms. Baasansureg	Ikh Am heseg	Heseg leader	June 15, 2021 – June 19, 2021
B. Nyambuu*	Ikh Am heseg	Heseg member	June 15, 2021 – June 19, 2021
B. Erdenebat	Ikh Am heseg	Heseg member	June 15, 2021 – June 19, 2021
D. Dogsom	Ikh Am heseg	Former Heseg leader	June 15, 2021 – June 19, 2021
D. Myagmarsuren	Ikh Am heseg	Heseg member	June 15, 2021 – June 19, 2021
Sh. Byambasuren	Ikh Am heseg	Heseg member	June 15, 2021 – June 19, 2021
Ya. Myagmarsuren	Ikh Am heseg	Heseg member	June 15, 2021 – June 19, 2021
Sh. Gantumur	Ikh Am heseg	Heseg member	June 15, 2021 – June 19, 2021
N. Tuvaanjav	Ikh Am heseg	Heseg member	June 15, 2021 – June 19, 2021
B. Damdinsuren	Ikh Am heseg	Heseg member	June 15, 2021 – June 19, 2021
Da. Gantulga	Ikh Am heseg	Heseg member	June 15, 2021 – June 19, 2021
S. Ishdorj	Ikh Am heseg	Heseg member	June 15, 2021 – June 19, 2021
B. Ulziinyam	Ikh Am heseg	Heseg member	June 15, 2021 – June 19, 2021
D Tsogtbaatar	Ikh Am heseg	Heseg member	June 15, 2021 – June 19, 2021

D. Davaasuren	Ikh Am heseg	Heseg member	June 15, 2021 – June 19, 2021

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

Theme	Major CARs	Minor CARs	Observations	Status
Project's Eligibility	As approved by Plan Vivo, this is the first verification of this project. The Verification report contains all Corrective Action Requests (CARs) requested by the VVB that are related to the Plan Vivo Standard, 2013 and Technical Specifications. Annex 1 of this report contains all the CARs that were raised and closed during the first verification.			
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 Ecosystem Services	Yes	Yes
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 validated PDD. Aster Global confirms the *Pastures, Conservation and Climate Action, Mongolia Project* has been implemented in accordance with Plan Vivo Standard 2013 criteria and validated PDD. Additionally, Aster Global confirms that the Annual Reports 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/mangers 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. During this verification event signed Collaboration Contracts were provided to the VVB, demonstrating that local herder groups/heseg have rights to any carbon related benefits that occur on land included in the project areas.		
B. Conformance	Yes <input checked="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			
<p>2.1 Project interventions are maintaining or enhancing biodiversity (2.2)</p> <p>2.2 Project interventions have not led to any negative environmental impacts (2.3)</p> <p>2.3 Any trees being planted to generate ecosystem services are native or naturalised species and are not invasive (2.4)</p>			
A. Findings (describe)	<p>The project activity is to prevent further degradation of rangeland by reducing grazing pressure through the reduction of animals and increased herder movement and the VVB is reasonably assured that these project interventions are not negatively affecting biodiversity nor lead to negative environmental benefits. The project has included additional biodiversity conservation activities (not intended to generate ecosystem services) such as patrolling forest areas to prevent poaching, biodiversity surveys, and forest cleaning. The audit team reviewed results from the biodiversity monitoring surveys and confirms that monitoring methods are being appropriately implemented. During the site visit the audit team found no evidence that biodiversity is being harmed as a result of project activities.</p>		
B. Conformance	<p>Yes <input checked="checked" type="checkbox"/></p>	<p>No <input type="checkbox"/></p>	<p>N/A <input type="checkbox"/></p>
C. Corrective Actions (describe)	<p>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.</p>		
D. (Insert Project Coordinator's Name) Response			
E. Status	<p>All corrective actions have been closed.</p>		

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
<p>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 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</p>

<p>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>The project coordinator (Mongolian Society for Range Management) was evaluated during validation and their capacity was deemed appropriate. No additional project proponents have been added during this verification period. During this monitoring period the audit team found no evidence that MSRM no longer has the capacity to sustain support for the project. During the site visit multiple herders noted that they had received support from MSRM and have been in contact with MSRM. Additionally, the audit team found no evidence that MSRM no longer has the legal or administrative capacity to enter into PES agreement.</p> <p>The audit team confirmed that the project has a separate bank account used solely for the management and disbursement of PES funds that is separate from their general operational finances. Quarterly financial planning and budget documents were provided to the audit team for the verification period.</p> <p>During the verification the audit team reviewed the Annual Reports and confirmed through interviews and a review of additional documentation that the Annual Reports accurately describe the progress, achievements, and problems encountered. Additionally, the Annual Reports transparently report sales figures and PES payments made to the herder groups.</p>		
B. Conformance	<p>Yes <input checked="" type="checkbox"/></p>	<p>No <input type="checkbox"/></p>	<p>N/A <input type="checkbox"/></p>
C. Corrective Actions (describe)	<p>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.</p>		
D. (Insert Project Coordinator's Name) Response	<p>Please see Annex 1.</p>		
E. Status	<p>All corrective actions have been closed.</p>		

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 exists 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)

It was confirmed at validation that project activities were developed with participants along with the support of the project coordinator. No new groups were added to the project during the verification period. Herders were involved in planning activities to ensure local needs were addressed. There was a potential for food security to be reduced due to the reduction in animals for herding, however during site visit interviews no herder said they felt the project had reduced their food security. Specifically, the herders interviewed described a process by which if herders felt they were able to reduce their animal numbers without reducing their food security they would reduce them; however, if herders were not able to reduce their animal numbers they simply didn't.

Financial, technical, and institutional barriers for participation were identified during validation. Actions to overcome these barriers are outlined in Table G2 of the Mongolia PDD. Herder groups include all households that share seasonal pasture areas, and therefore do not exclude any participants based on any form discrimination. The audit team found no evidence that herder communities were excluded from participating in project on the basis of any of the criteria described in 4.2.

As shown through meeting minutes provided to the audit team and interviews conducted on the site visit, the Hesegs made a decision to maximize their livelihood benefits by setting up a mutual fund to lend money to each other. This revolving loan fund allows herder's to borrow at lower rates and have access to capital that they would otherwise not have access to. The decision to lend is a community

	<p>decision determined by the individual herder groups. The audit team found no evidence of any negative impacts on participants in the annual reports or during the site visit.</p> <p>Boundaries for each Plan Vivo were provided to the audit team in the form of shapefiles. The areas calculated match those reported in the PDD. Copies of the Plan Vivos were provided to project participants in Mongolian, the appropriate language for the area.</p> <p>The audit team reviewed the meeting minutes, photos of biannual meetings, and confirmed during the site visit that forums are available for herders to provide feedback to the project coordinator.</p> <p>During the site visit some herders were concerned that herders from outside the herder group were using their pastures. This finding was discussed with MSRM and it was clarified that the only group who can enforce boundaries are the Soum officials. The VVB is issuing a Forward Action Request (FAR) that during the next monitoring period MSRM discuss this concern specifically with each herder group so that all herder groups understand the limits of what MSRM can do and put a process in place that ensures these concerns can be addressed.</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

- 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)
- 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

<p>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>During the verification process the verification team reviewed all default factors and assumptions (that were not already included in the Plan Vivo validated methodology) and confirmed their appropriateness. Importantly the model to determine whether or not GHG emission reductions have occurred has been updated using real (instead of estimated) pasture biomass (tdm/ha). The VVB was concerned that the ex-ante soil carbon model was not re-run using the updated data and discussed this issue with Plan Vivo. Plan Vivo determined that the project did not need to re-run the soil organic carbon model and that the inclusion of updated pasture biomass values was appropriate.</p> <p>The VVB confirmed that MSRM has procedures in place to ensure the number of animals reported and the number of herder camp moves reported by the herder groups is accurate. The VVB reviewed documented evidence provided by MSRM to confirm that that project coordinator has conducted appropriate ground-truthing activities.</p> <p>Remote sensing is not included as part of the PDD, thus 5.3 and 5.4 are not applicable.</p> <p>Additionality was confirmed at validation and thus not reviewed in detail by the VVB. However, the VVB found no evidence that the project interventions are no longer additional.</p> <p>The VVB conducted independent internet searches to reach reasonable assurance regarding double counting. The VVB found no</p>

	<p>evidence of double counting and confirms that there is a system in place for preventing double counting in the future.</p> <p>Aster Global confirms that the robust monitoring system that was validated is in place and continues to be applied as described in the validated PDD. Communities are the basis for the monitoring system as each herder group reports its animal numbers and movements in line with each heseg's management plan. The VVB confirms that outside sources such as Soum level animal census data and independent checks by MSRM are used to validate the monitoring data reported by the herder groups. Monitoring reports are maintained by each heseg and results are presented and discussed annually at community meetings. The VVB confirmed via interviews and documented evidence provided by MSRM that monitoring results are shared and discussed at community meeting.</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	
<p>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)</p> <p>6.2 The level of risk buffer that has determined using an approved approach is adequate and is a minimum of 10% of climate services expected (6.3)</p> <p>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)</p>	
A. Findings (describe)	Through multiple discussions with the project and supported by evidence provided by the project, Aster Global is reasonably assured that both market leakage and activity shifting leakage has been

	<p>appropriately accounted for and are below the 5% threshold as required by the Plan Vivo Standard. The project was designed to mitigate leakage where possible, specifically pastures where usage is characterized by significant herder usage from other herder groups and off-site migrations are common were excluded from the project area at validation. As the project is implemented, MSRM monitors large scale organized movements to areas outside the project area and has confirmed that none of these large-scale migrations have occurred during the verification period.</p> <p>Risks to the delivery of ecosystem services and sustainability area identified and appropriate mitigation measures are described. The risk assessment was conducted during validation in August 2015 and covers the current monitoring period. Additionally, the project conducted an assessment of whether the risk buffer needed to be updated for this verification period and confirmed that the risk buffer is still appropriate. The VVB reviewed the assessment and is reasonably assured the risk assessment conducted at validation is still appropriate. For regions in which the model was parameterized, a 10% risk buffer is applied. For regions in which the model is not parameterized, a 20% risk buffer is applied. As stated in the PDD, the project applies a 10% risk buffer to the Hongor Ovoo heseg and a 20% risk buffer to the Ikh Am and Dulaan Khaikhan hesegse.</p> <p>The audit team confirmed that the project maintains an account with Markit. Additionally, the VVB confirmed that the buffer account has the correct cumulative amount of credits as reported in the latest Annual Report.</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

- 7.1. Procedures for entering into a PES Agreement with participants are being applied correctly **(8.2)**
- 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)**
- 7.3. PES Agreements are not removing, diminishing or threatening participant's land tenure **(8.4)**
- 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)**
- 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)**

A. Findings (describe)	<p>As required by the validated methodology and the Plan Vivo Standard, 2013, the PDD describes procedures for entering into PES Agreements. The audit team reviewed meeting minutes from multiple meetings in which the community was involved in the decision-making process for establishing the Protected Area, developing the management plan, and signing of the PES Agreement. Based on a review of the evidence and interviews with the community members and leaders the audit team is reasonably assured that the herder groups entered these agreements voluntarily and according to the principle of free, prior, and informed consent (FPIC). It should be noted that these requirements (7.1-7.3) were satisfied at validation and no new PES Agreements have been established during this verification period.</p> <p>The PES Agreement clearly describes the benefit sharing mechanism and has been agreed to be the herder groups. Since pastureland cannot be under private ownership and groups of herders jointly possess campsites, the audit team is reasonably assured that no land tenure rights are threatened or diminished due to project activities.</p> <p>The audit team reviewed bank transfer statements and a MSRM budget showing an allocation of 70% of sales revenue to the project participants. The audit team is reasonably assured that the project is delivering a minimum of 60% of sales revenues to project communities.</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 repsonses that were identified during this verification event.		
D. (Insert Project	Please see Annex 1.		

Coordinator's Name) Response	
E. Status	All corrective actions have been closed.

The Verifier: (Aster Global Environmental Solutions Inc.)

Signature: (the Verifier) 

Date: 1/31/22

Lead Verifier: Shawn McMahon

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ANNEX 1: Corrective Actions Issued During the 1st Verification

Findings Number	1
Plan Vivo Standard 2013 (Section)	1. Eligible project intervention areas and participants
Plan Vivo Standard 2013 (Subsection and Description)	1.1. Project interventions must take place on land where smallholders and/or community groups (collectively known as 'participants') have clear, stable land tenure, either via ownership, or user rights that enable them to commit to project interventions for the duration of the PES Agreement.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD
Aster Global Round 1 Findings	<p>C3 of the PDD States "The situation with regards to land tenure is as specified in C1/2 above and I3. A sample contract is included at Annex 6. There is currently no specific legislation relating to ownership of carbon in Mongolia. Under the type of sample agreement included at Annex 6 and to be signed for each heseg/herder group as part of the site specific Plan Vivo agreement (Annex 3), soum authorities have recognized the rights of local herder groups/ heseg to any carbon related benefits accruing through Plan Vivo activities. This applies to all land included in the project areas."</p> <p>However, the audit team was unable to locate the signed Collaboration Contracts for each Heseg.</p>
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please provide signed copies of the Collaboration contracts.
Round 1 Response from Project Coordinator (DD Month YYYY)	We have this agreement, Attachment# 1,2,3.
Aster Global Findings - Round 2	Attachments 1, 2, and 3 do not appear to be the collaboration contracts.
Aster Global Requests CAR/FAR/OBS - Round 2	mCAR: Please provide the collaboration contracts as requested in the Round 1 Findings.
Round 2 Response from Project Coordinator (DD Month YYYY)	Please see the attachments #38.1,#38.2.#38.3
Aster Global Findings - Round 3	Collaboration contracts were provided for the Khongor Ovoo, Dulaankhairkhan, and Ikh Am hesegs. This item is addressed.
Findings Number	2

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.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD
Aster Global Round 1 Findings	The audit team reviewed the annual reports and confirms that the actions are being taken to protect and enhance biodiversity. Additionally, data biodiversity surveys are being conducted. However, the audit team was unable to find the outputs (reports or raw data) of the ZSL surveys.
Aster Global Requests CAR/FAR/OBS - Round 1	mCAR: Please provide the ZSL surveys.
Round 1 Response from Project Coordinator (DD Month YYYY)	The ZSL report from the initial surveys is included as Annex 5 in the Year 1 AR. As noted in subsequent ARs, it was not possible to repeat these surveys every year due to resource constraints. Nonetheless, actions were taken to protect and enhance biodiversity throughout the project as set out in the PDD (Annex 5 management plans) and reported against in each subsequent AR (all of which were made available to AG).
Aster Global Findings - Round 2	Thank you for the clarification. The audit team reviewed the annual reports and confirmed that the annual reports accurately state that the ZSL camera trap surveys were not repeated after year 1. However, the transect survey monitoring methods are implemented.

Findings Number	3
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 formalised in a written agreement, e.g. Memorandum of Understanding, which must be kept up-to-date as the project progresses.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD Part I
Aster Global Round 1 Findings	This was confirmed at validation and has not changed. The audit team was unable to find a document that satisfies this requirement.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please clarify how this criterion is satisfied and provide supporting evidence in the form of an up-to-date written agreement.

Round 1 Response from Project Coordinator (DD Month YYYY)	Coordination functions have in hand of MSRM. As MSRM are the project coordinators, then coordination functions haven't been shared or delegated to the any bodies.
Aster Global Findings - Round 2	The audit team found no evidence that the project coordinator has changed or that project coordinator activities are shared between groups. This was confirmed via interviews with MSRM.

Findings Number	4
Plan Vivo Standard 2013 (Section)	3. Project coordination and management
Plan Vivo Standard 2013 (Subsection and Description)	3.9. A transparent mechanism and procedures for the receipt, holding and disbursement of PES funds must be defined and applied, with funds intended for PES earmarked and managed through an account established for this sole purpose, separate to the project coordinator's general operational finances.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD Section I5
Aster Global Round 1 Findings	The PDD states that "MSRM will establish an account solely for the management and disbursement of PV funds and separate from their general operational finances." However, the audit team was unable to find verifiable evidence that the account exists.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please provide verifiable evidence to support the assertion in the PDD.
Round 1 Response from Project Coordinator (DD Month YYYY)	We have separate account / Account number is 5021 226 304 USD /
Aster Global Findings - Round 2	The audit team confirmed that a separate bank account is used in line with this criterion. As evidence of the separate bank account, account statements showing transactions were provided to the VVB.

Findings 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.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting	PDD

Documents	
Aster Global Round 1 Findings	The audit was unable to locate project budget and financial plans that were updated every three months.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please provide updated project budget and financial plans.
Round 1 Response from Project Coordinator (DD Month YYYY)	We do our financial planning in quarterly. Attachment # 4.
Aster Global Findings - Round 2	The audit reviewed the document titled Plan Vivo project financial planning by 2016-2019. However, this appears to show a financial plan that covers 3 years rather than every three months as required by the Plan Vivo Standard.
Aster Global Requests CAR/FAR/OBS - Round 2	MCAR: Please provide evidence that shows that the project budget and financial plans are updated every three months.
Round 2 Response from Project Coordinator (DD Month YYYY)	Please see the attachments #39.1,#39.2.#39.3
Aster Global Findings - Round 3	The audit team reviewed the quarterly financial planning and budget documents provided for 2016-2019 and confirms that the plans are updated every three months. No additional evidence is required, this item is closed.

Findings 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.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD and Annual Reports
Aster Global Round 1 Findings	The audit team was unable to locate evidence that this criterion is satisfied.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please provide signed PES agreements and monitoring results.
Round 1 Response from Project Coordinator (DD Month YYYY)	Please see Attachment the signed PES agreements.# 1,2,3. Monitoring results of Management Plan summarised in PV annual reports

Aster Global Findings - Round 2	Thank you for providing the requested documents. The audit team reviewed the PES agreements and confirmed that this criteria is satisfied. No further action is needed.
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Findings Number	7
Plan Vivo Standard 2013 (Section)	3. Project coordination and management
Plan Vivo Standard 2013 (Subsection and Description)	3.13. Community members, including women and members of marginalised groups, must be given an equal opportunity to fill employment positions in the project where job requirements are met or for roles where they can be cost-effectively trained.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD and Annual Reports
Aster Global Round 1 Findings	It is unclear to the audit team whether there have been opportunities for employment.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please clarify in line with the finding. If employment opportunities have been offered, please provide verifiable evidence to satisfy this criterion.
Round 1 Response from Project Coordinator (DD Month YYYY)	Currently, herders selected by the group meeting are the local coordinators of the project. There are 2 female herders out of 3 local coordinators. Due to the financial situation, they are working without pay. In the future, if the amount of project funding increases, certain incentives and salaries will be required. Because these herders live far from the soum center, their daily financial transactions are handled by someone in the soum center. In other words, it is done by an accountant. Since it is not possible to come in from a remote place every day, the group leader decides when and how much money to lend to whom, and the transaction is signed by the accountant. It is up to the Group Leader to decide which financial transactions to make, when, and so on. Project funds cannot be transferred to an individual, such as a group leader, so they must be transferred through an officially registered NGO account. It is possible to monitor only by transferring it to an official organization's account.
Aster Global Findings - Round 2	Thank you for the clarification. The audit team understands that equal opportunity employment is used in the project. Additionally, during the site visit no issues related to employment were noted by community members. This criterion is satisfied.

Findings Number	8
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.

Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD Annex 5
Aster Global Round 1 Findings	The audit team reviewed the boundary maps for plan vivos provided in the PDD and the provided GIS files.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please clarify which shape file represents the Dulaan Kharkhain heseg.
Round 1 Response from Project Coordinator (DD Month YYYY)	Dulaankhairkhan shape file was sent together with other parts of Ikh Am and Khongor ovoo groups. Let's send it again
Aster Global Findings - Round 2	<p>The audit team reviewed the shapefiles and apologizes because the audit team did not realize that the Dulaan Kharkhain heseg is represented by the "Bogd_PUG".</p> <p>The audit team calculated the area of the Dulaan Kharkhain heseg and found the area to be 22339.62 hectares. However, the PDD states that area of this heseg is 22485. It is unclear why this discrepancy exists.</p>
Aster Global Requests CAR/FAR/OBS - Round 2	MCAR: Please clarify for the audit team why there a discrepancy exists between the area of the shapefile and the area stated in the PDD. If this is an error, please clarify which number is incorrect and update the incorrect number. Additionally, please update all downstream calculations in necessary.
Round 2 Response from Project Coordinator (DD Month YYYY)	Dulaankhairkhan Shapefile was sent by e-mail
Aster Global Findings - Round 3	The Dulaanhkarkhain shapefile provided now has a calculated area of 22485.039232, which matches the value found in the PDD. This item is addressed.

Findings Number	9
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.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD Section E1 and J1
Aster Global Round 1 Findings	The audit team was unable to find evidence that satisfies this criterion.

Aster Requests CAR/FAR/OBS Round 1	Global -	MCAR: Please provide a copy of all Plan Vivos in the appropriate language.
Round 1 Response from Project Coordinator (DD Month YYYY)		All relevant materials of Plan VIVO have been translated into Mongolian and distributed to project participants. Attachment # 5,6,7.
Aster Findings - Round 2	Global	The audit team reviewed the referenced attachments and confirmed that the Plan Vivos have been translated into Mongolian. This criterion is satisfied. No further action is needed.

Findings Number	10
Plan Vivo Standard 2013 (Section)	4. Participatory design and development of plan vivos
Plan Vivo Standard 2013 (Subsection and Description)	4.11. In the case where the area covered by a plan vivo is greater than 50 hectares, a GIS version of the plan vivo, showing its boundaries and the boundaries delineating any different internal activities, must be created and recorded.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	
Aster Global Round 1 Findings	The audit team was unable to find a GIS version of the plan vivo that meets this criterion.
Aster Requests CAR/FAR/OBS Round 1	Global -
Round 1 Response from Project Coordinator (DD Month YYYY)	MCAR: Please provide a GIS version of the Plan Vivo in line with the Plan Vivo Standard.
Aster Findings - Round 2	Please see shape file
Aster Requests CAR/FAR/OBS Round 2	Global -
Round 2 Response from Project Coordinator (DD Month YYYY)	The audit team reviewed the shapefiles and notes that the shapefiles do not show the different strata e.g. Mountain Steppe, Steppe, etc.
Aster Findings - Round 3	MCAR: Please provide shapefiles that show the stratas in each heseg.
Round 2 Response from Project Coordinator (DD Month YYYY)	Khogor ovoo, Ikh am and Dulaankhairkhan Shapefile was sent by e-mail
Aster Findings - Round 3	The shapefiles provided for Khogor ovoo, Ikh am and Dulaankhairkhan now show the stratas for the project area. The calculated areas match the areas reported in the PDD. This item is addressed.

Findings 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.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	Annual Reports Section H
Aster Global Round 1 Findings	<p>The PDD states " During the initial 4 year commitment period regular heseg/ community meetings will provide the forum for discussions of the design and running of the PV project. Such discussions will be minuted and shared with MSRM, for their feedback and comment if desired. Heseg may also invite MSRM staff to attend such meetings, where required, for example to discuss and problems or grievances, but this will be at the behest of the heseg themselves."</p> <p>However, the audit team was unable to find the meeting minutes from the community meetings. Additionally, it is unclear what structure is in place where the project coordinator meets with participants.</p>
Aster Global Requests CAR/FAR/OBS - Round 1	<p>MCAR: Please provide meeting minutes for any meetings that took place during this monitoring period.</p> <p>MCAR: Please clarify what structure is in place that provides a forum for discussion between participants and the project coordinator.</p> <p>MCAR: Please provide verifiable evidence that the meetings between project participants and the project coordinator have taken place.</p>
Round 1 Response from Project Coordinator (DD Month YYYY)	<p>Meeting minutes for any meetings during this monitoring period sent to AG on 26 may 2021. Please see the meeting minutes in the attachment: #. 8,9,10. Meetings between the project coordinator and participants are held twice a year. Once, we go to the local area to meet with herder groups (herders) to discuss project implementation, listen to reports on their work, and provide guidance. It is difficult to bring all PUG herders together and talk. Because herders in the area live between 5 and 20 km away, they gather in nearby locations. In other words, they hold 5-6 meetings in one PUG.</p> <p>The second meeting is being held in Ulaanbaatar with the participation of group leaders and herders. At this meeting, we exchange views on the implementation of the current year's plan and the work plan for the next year, the achievements, good practices and challenges of the project implementation. Photo for the Meetings between project participants and project coordinator. # 11,12,13.</p>
Aster Global Findings - Round 2	The audit team reviewed the meeting minutes, photos of the biannual meetings, and confirmed via the site visit that forums are available for herders to provide feedback to the project coordinator. This criterion is satisfied. No further action is needed.
Findings Number	12

Plan Vivo Standard 2013 (Section)	4. Participatory design and development of plan vivos
Plan Vivo Standard 2013 (Subsection and Description)	4.14. A robust grievance redressal system should be part of project design, and should ensure that participants are able to raise grievances with the project coordinator at any given point within the project cycle, and that these grievances are dealt with in a transparent, fair, and timely manner. A summary of grievances received, the manner in which these are dealt with, and details of outstanding grievances must be reported to the Plan Vivo Foundation through the periodic reporting process.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD Section E3
Aster Global Round 1 Findings	<p>The audit team reviewed the PDD and Annual Reports and noted that there was a system for grievance redressal in the PDD. However, evidence of grievance reports were not found in the annual reports.</p> <p>During the site visit multiple project participants indicated that they are concerned that their actions of increasing pasture rotation are being negated by other herders moving into the pasture locations. This was the primary grievance that was given during the Site Visit.</p>
Aster Global Requests CAR/FAR/OBS Round 1	<p>MCAR: Please clarify in line with the finding. If grievances were raised during the project cycle, please provide verifiable evidence that they were addressed according to the system outlined in the PDD.</p> <p>MCAR: Please clarify how this grievance will be addressed.</p>
Round 1 Response from Project Coordinator (DD Month YYYY)	<p>We have not received such a special grievance. Disputes within the boundaries of a PUG or a group's pastureland are negotiated and resolved by the group itself. However, herders from other groups and soums often enter otor within the boundaries of the pastureland. This leads to some conflicts. This is a conflict in a nomadic herding country where pastures are not partially fenced. this is not a grievance about the project - its a wider grievance about pasture management in Mongolia, which only the soum administration can resolve, as they are responsible for controlling pasture use and allocation; actions of incoming herders. The PCCA / MSRM is not able to address this on its own and may suggest that soum authorities address the issue. So far, we have not received such a complaint, so we have not submitted a request to the administration to resolve it.</p>
Aster Global Findings - Round 2	<p>Thank you for providing additional detail. The audit team now understands that this grievance is a wider grievance that herders are dealing with, and it is the responsibility of the Soum leaders to enforce heseg boundaries as it relates to other herder groups.</p> <p>The audit team believes this issue should be discussed with Soum leaders and will provide this a forward action request to ensure at the next verification that this issue has been discussed with Soum leaders.</p>

Findings Number	13
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Plan Vivo Standard 2013 (Section)	5. Quantifying and monitoring ecosystem services
Plan Vivo Standard 2013 (Subsection and Description)	5.2. Sources of data used to quantify ecosystem services, including all assumptions and default factors, must be specified and as up to date as possible, with a justification for why they are appropriate.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	
Aster Global Round 1 Findings	The PDD states that for the Ikh Am and Dulann Khaikhhan hesegs the model used an increased risk factor (20%) and "other adjustments" because the model was not validated for this region. It is unclear what these other adjustments are and if they are appropriate.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please clarify what the "other adjustments" are and please provide justifications as to why they are appropriate.
Round 1 Response from Project Coordinator (DD Month YYYY)	There were no risks in the initial phase of the project and no adjustments were made.
Aster Global Findings - Round 2	Thank you for the clarification. Considering all the modeling for the project occurred ex-ante and has been validated by Plan Vivo TAC and the validator, the VVB is reasonably assured this criterion is satisfied. No further action is needed.

Findings Number	14
Plan Vivo Standard 2013 (Section)	5. Quantifying and monitoring ecosystem services
Plan Vivo Standard 2013 (Subsection and Description)	5.5. Ecosystem services must be accounted for over a specified quantification period that is of sufficient length to provide a clear picture of the long-term impact of the activity.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	
Aster Global Round 1 Findings	The audit team was unable to locate the specified quantification period.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please clarify what the quantification period is. Additionally, please provide a justification to demonstrate that the quantification period satisfies this quantification period.

Round 1 Response from Project Coordinator (DD Month YYYY)	I am not clear what is meant by demonstrating 'that the quantification period satisfies this quantification period' as requested here. Essentially the 'quantification period' is the 4 year duration of this Phase (2015-2019) as set out in the PDD and approved by Plan Vivo. Evidence of the long term impact of the activity as relates to pertinent ES is as set out on the Annex 5 management plans for each site, each of which has a very detailed list of indicators, which are reported back in in each AR.
Aster Global Findings - Round 2	After discussion with Plan Vivo regarding this issue, it is clear that this criterion was confirmed at validation and is out of the scope of the verification. This criterion is satisfied, no further action is needed.

Findings Number	15
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
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	
Aster Global Round 1 Findings	<p>Performance indicators are outlined in the management plan for project interventions. However, the audit team was unable to locate evidence for the following achieved results:</p> <p>a. Signed MOU agreements between herder groups and local administration</p> <p>b. Results of ZSL surveys beyond baseline survey</p> <p>Additionally, the audit team is requesting the herder rotation data and number of animals from each heseg at a herder level.</p>
Aster Global Requests CAR/FAR/OBS - Round 1	<p>MCAR: Please provide the MOU agreements between herder groups and the local administration and results of ZSL surveys.</p> <p>MCAR: Please provide the herder level data for rotational movements and number of animals for each heseg in the project area.</p>
Round 1 Response from Project Coordinator (DD Month YYYY)	Agreement with soum administration attachment # 14,15,16.Rotational movement attachment# 17. Number of animals # 18,19,20.

Aster Findings - Round 2	Global	<p>The audit team reviewed the Number of Animals for each herder that were provided in attachments 18, 19, and 20. The audit team noted that there is no distinction between young and old animals and that there is not distinction between which animals were in which Strata (e.g. riparian meadow, mountain meadow, etc) and season (e.g. spring/summer, summer, winter, etc.). Additionally, there did not appear to be data for 2019. Furthermore the audit team needs this data in a format that is easily manipulated such as a word document or excel spreadsheet.</p> <p>The audit team reviewed attachment 17 and noted that this data is at the herder group level and not the herder level as requested.</p>
Aster Requests CAR/FAR/OBS Round 2	Global -	<p>MCAR: Please provide the herder level animal data distinguishing between young and adult animals and showing how many animals of each type are in what strata and season for each year during the monitoring period. Please provide this data in the format that can be manipulated by the audit team either in a word document or preferably and excel spreadsheet.</p> <p>MCAR: Please provide the herder level data demonstrating each individual herders movements between locations and seasons. Please provide this in a format that can be manipulated by the VVB.</p>
Round 2 Response from Coordinator (DD Month YYYY)	Project	Please see the attachment :number of animals by type area,young and old,#40.1,#40.2,# 40.3; movement by area.#41.1,#41.2,#41.3
Aster Findings - Round 3	Global	Thank you for providing the herder level animal data. The audit team reviewed the data and confirmed the quantification of sheep units. This item is closed.

Findings Number	16
Plan Vivo Standard 2013 (Section)	5. Quantifying and monitoring ecosystem services
Plan Vivo Standard 2013 (Subsection and Description)	5.9.5. How the validity of any assumptions used in technical specifications are to be tested
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	
Aster Global Round 1 Findings	It is unclear to the audit team how this criteria is satisfied.
Aster Requests CAR/FAR/OBS Round 1	Global - MCAR: Please clarify how this criteria is satisfied.

Round 1 Response from Project Coordinator (DD Month YYYY)	I am unclear which specific 'assumptions' you are referring to here. The procedures for CENTURY modelling and any associated assumptions therein are clearly set out in the PDD as part of the technical specification (Part G), all of which was closely reviewed and approved by PV and their technical panel.
Aster Global Findings - Round 2	Thank you for the clarification. The audit team understands that Part G has been reviewed closely by the TAC and was confirmed at validation. Considering no modeling has been conducted this period. The audit team is reasonably assured that this criterion is satisfied.

Findings Number	17
Plan Vivo Standard 2013 (Section)	5. Quantifying and monitoring ecosystem services
Plan Vivo Standard 2013 (Subsection and Description)	5.9.6. Resources and capacity required
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	
Aster Global Round 1 Findings	It is unclear to the audit team how this criterion is satisfied.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please clarify how this criterion is satisfied.
Round 1 Response from Project Coordinator (DD Month YYYY)	As set out in the PDD Annex 5 - these management plans detail who will undertake the monitoring for each indicator, e.g. self reported by herder group members, confirmation by MSRM. This is the 'staffing' resources required. Training undertaken by MSRM is also specified in PDD/ ARs. There are no other resources that need to be highlighted here. MSRM costs for travel etc are addressed in response to other questions re budgets etc.
Aster Global Findings - Round 2	Thank you for the clarification. The audit team reviewed the management plans that describe the capacity needed to carry out the project. This criterion is satisfied.

Findings Number	18
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
Requirement Met (Y, N, or NA)	Y

Location in PDD or Supporting Documents	
Aster Global Round 1 Findings	It is unclear to the audit team how this criterion is satisfied.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please clarify how this criterion is satisfied.
Round 1 Response from Project Coordinator (DD Month YYYY)	We do participants meeting 2 times in year / in countryside and in the UB city .Please see attachment # 8.9.10.
Aster Global Findings - Round 2	The audit team reviewed the attachments and noted that all these documents are from 2018. The audit team was unable to find verifiable evidence that these meetings took place during the other years in the monitoring period.
Aster Global Requests CAR/FAR/OBS - Round 2	MCAR: Please provide verifiable evidence that these meetings took place in the other years during the monitoring period. Additionally, please provide these documents in a word document format rather than a photo so the VVB can easily translate the meeting minutes.
Round 2 Response from Project Coordinator (DD Month YYYY)	Please see the attachments:#42.1,#42.2,#42.3,#42.4,#42.5,#42.6,#42.7,#42.8,#42.9,#42.10
Aster Global Findings - Round 3	Minutes for several meetings that took place in 2016, 2017 were provided to the audit team as word documents. The meetings included sharing the monitoring results with the project participants. This criterion is satisfied.

Findings Number	19
Plan Vivo Standard 2013 (Section)	5. Quantifying and monitoring ecosystem services
Plan Vivo Standard 2013 (Subsection and Description)	5.10. Where participants are involved in monitoring, a system for checking the robustness of monitoring results must be in place, e.g. checking a random sample of monitoring results by the project coordinator.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	
Aster Global Round 1 Findings	<p>The audit team understands that biannual confirmation of monitoring results takes place; however, the audit team was unable to find the results of the biannual confirmation.</p> <p>Additionally, more detail is needed as to how the the biannual confirmation is appropriate or would catch errors from the herder groups self-reporting.</p>

Aster Requests CAR/FAR/OBS Round 1	Global	MCAR: Please provide the results of the biannual confirmation.
	-	MCAR: Additionally, please clarify how the biannual confirmation of self-reported numbers would catch misreporting by the herder groups.
Round 1 Response from Coordinator (DD Month YYYY)	Project	A sample survey was conducted on the number of livestock and the number of migrations from 7 herder households in Khongor Ovoo, 8 in Ikh Am, and 6 in Dulaankhairkhan. Consistent with previously obtained material. The soum land officer, environmental inspector, bagh public meeting chairperson and bagh governors were consulted about the migration of these households. A brief report and photos of some herders were attached. Attachment # Random sample monitoring results:21,22,23; Photo 24-30.
Aster Findings - Round 2	Global	Thank you for providing the requested documents. The audit team is requested a version of the report and Random Sample Monitoring results in English so we can confirm that the results of the monitoring.
Aster Requests CAR/FAR/OBS Round 2	Global	MCAR: Please provide a copy of the attachments in English.
Round 2 Response from Coordinator (DD Month YYYY)	Project	please see the attachments:#43.1.2.3
Aster Findings - Round 3	Global	Thank you for providing the Random Sample Monitoring results in English. The audit team confirms that biannual monitoring takes place as described in the PDD. This item is addressed.

Findings Number	20
Plan Vivo Standard 2013 (Section)	5. Quantifying and monitoring ecosystem services
Plan Vivo Standard 2013 (Subsection and Description)	5.14. To avoid 'double counting' of ecosystem services, project intervention areas must not be in use for any other projects or initiatives, including a national or regional level mandatory GHG emissions accounting programme, that will claim credits or funding in respect of the same ecosystem services, unless a formal agreement is in place with the other project or initiative that avoids double-counting or other conflicting claims, e.g. a formal nesting agreement with a national PES scheme.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD Section G2
Aster Global Round 1 Findings	The audit team conducted a web search for other carbon projects that may overlap the current project area. The audit team found a project called the "Green Gold" pasture ecosystem management project which appears to extend into the project area. It is unclear how these plan vivo certificates are not being double counted with another carbon project.

Aster Requests CAR/FAR/OBS Round 1	Global -	MCAR: Please clarify in line with the finding.
Round 1 Response from Project Coordinator (DD Month YYYY)		The Green Gold project is a pastureland management project that has nothing to do with the carbon project, there is no overlap, it is not double counted.
Aster Findings - Round 2	Global	Thank you for the clarification. The audit team further investigated reports from the Green and Gold length and found no evidence that this project is generating carbon credits.

Findings Number	21
Plan Vivo Standard 2013 (Section)	5. Quantifying and monitoring ecosystem services
Plan Vivo Standard 2013 (Subsection and Description)	5.19. All potential sources of leakage and the location of areas where leakage could occur must be identified and any appropriate mitigation measures described.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PD Part F
Aster Global Round 1 Findings	The PD states that the project design is ensures that there is no additional leakage in the project scenario; however, during the site visit multiple herders indicated that herders from outside the heseg were coming into "their" better pastures to graze. The herders indicated that more enforcement from soum officials was needed.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please provide a quantitative demonstration showing that leakage project scenario is not higher than the baseline scenario.
Round 1 Response from Project Coordinator (DD Month YYYY)	The PDD does not quite say that! In some years of drought and dzud, herders from other soums come, but all of these issues are regulated by agreements between aimag and soum governors. Section G6 p.57 of the PDD is the key one here. As this states the project does not and should not seek to curtail long distance movements as a traditional risk management strategy e.g.. in times of dzud.Pasture boundaries in the Ikh-am PUG are defined only by winter and spring pastures. The group leader said that no herders from outside grazed within the boundaries of this pasture. Summer and autumn pastures are public pastures used by all herders in the soum and are not included in the carbon sequestration boundaries of Ikh Am PUG. Not having seen Batbuyan's report it is not known which pastures herders were referring to as being affected by incoming herders. As set out in every AR there has never been a case in which recipient areas noted this as an issue or sought to claim PV funding.
Aster Global Findings - Round 2	Thank you for the clarification. The audit team understands that MSRM has reached out to the Heseg leaders to ensure that this problem is not occurring. However, no evidence to support this has been provided.

Aster Requests CAR/FAR/OBS Round 2	Global -	MCAR: Please provide verifiable evidence from the heseg leaders that herders from outside the heseg group are grazing pastures in the project area outside the times of dzud.
Round 2 Response from Coordinator (DD Month YYYY)	Project	please see the Soum Governors Reference.#44.
Aster Findings - Round 3	Global	The Project Proponent provided three documents signed by the Soum Governors stating that no outside livestock came into the grazing pastures. The audit team is reasonably assured that this criterion is satisfied.

Findings Number	22	
Plan Vivo Standard 2013 (Section)	5. Quantifying and monitoring ecosystem services	
Plan Vivo Standard 2013 (Subsection and Description)	5.20. Where leakage is likely to be significant, i.e. likely to reduce climate services by more than 5%, an approved approach must be used to monitor leakage and subtract actual leakage from climate services claimed, or as a minimum, make a conservative estimation of likely leakage and deduct this from the climate services claimed.	
Requirement Met (Y, N, or NA)	Y	
Location in PDD or Supporting Documents		
Aster Global Round 1 Findings	The audit team was unable to find a demonstration that satisfies this criterion.	
Aster Requests CAR/FAR/OBS Round 1	Global -	MCAR: Please provide a demonstration showing that leakage is likely to be insignificant.
Round 1 Response from Coordinator (DD Month YYYY)	Project	Please see comments above. Procedures are in place to deal with leakage and exclude any areas where this is likely to be significant from calculations.
Aster Findings - Round 2	Global	This item is marked pending until finding 21 is closed.
Aster Requests CAR/FAR/OBS Round 2	Global -	
Round 2 Response from Coordinator (DD Month YYYY)	Project	please see the Soum Governors Reference.#44.
Aster Findings - Round 3	Global	The Project Proponent provided three documents signed by the Soum Governors stating that no outside livestock came into the grazing pastures. The audit team is reasonably assured that this criterion is satisfied.

Findings Number	23
Plan Vivo Standard 2013 (Section)	7. Livelihood impacts
Plan Vivo Standard 2013 (Subsection and Description)	7.1. The project must demonstrate clear plans to benefit the livelihoods of participants. The definition of what constitutes a benefit will be defined by local participants.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	
Aster Global Round 1 Findings	<p>During the site visit the audit found that most herders reported that there has been no change to their income as result of the project. The most commonly cited reason was that their money from the project is pooled at the heseg level and used for herder families in need.</p> <p>Additionally, during the site visit multiple families reported that they took loans from "the revolving fund". It is unclear to the audit team how loans are incorporated into the project.</p>
Aster Global Requests CAR/FAR/OBS Round 1	<p>MCAR: Please provide documentation showing how each herder group has decided to use funds for the project.</p> <p>MCAR: Please clarify what the "revolving fund" is and how it fits into the project design.</p>
Round 1 Response from Project Coordinator (DD Month YYYY)	<p>In October 2017, when the first funding for the project was received, the PUG and Herders groups met to discuss how to use the allocated funds. The issue was whether to distribute the money to each household and give \$ 3-5 to each household, or to set up a mutual fund and lend it to each other. So it was decided to set up a mutual fund. Poor herders family couldn't get a loan from the bank. Because of bank loan rate is high than the our loan . Also they have not enough animals to loan collateral. One more our loan advantage is loan taking process is easy for herders. There is no need much document and papers. It is going under their trusting. We have separate PUG fund rule. They approved this rule themselves. Attachment# Meeting munutes for revolving fund and its rule :31,32,33,34.</p>
Aster Global Findings - Round 2	<p>Thank you for the additional information. The audit team now better understands how the hesegs are utilizing the PES funds. Importantly, through the meeting minutes provided by MSRM this was a decision made by the Hesegs to maximize their livelihood benefits from the project. This criterion is satisfied.</p>

Findings Number	24
Plan Vivo Standard 2013 (Section)	7. Livelihood impacts
Plan Vivo Standard 2013 (Subsection and Description)	7.2.5. Main livelihood activities

Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD Part C2,F2
Aster Global Round 1 Findings	<p>The audit team found no mention of impacts on the livelihood activities in the PDD. However, during the site visit it was clear that if a family felt like they were not able to decrease their herd size they simply didn't decrease it.</p> <p>The audit team is requesting more clarity on how this issue is addressed by the project design and what feedback it has gotten from the communities regarding this issue.</p> <p>During the site visit</p>
Aster Global Requests CAR/FAR/OBS Round 1	MCAR: Please clarify in line with the finding.
Round 1 Response from Project Coordinator (DD Month YYYY)	<p>it is not clear what is meant by the claim in column F that 'the audit team found no mention of impacts on the livelihood activities in the PDD'. These are discussed at some length in C2, F2 (as indicated in column E). Annual/ bi annual livelihood/ socio economic indicators are then set out in the management plans for each site in Annex 5 of the PDD, and reported against in each subsequent annual report. The final AR for Phase 1 also presents data for change against the livelihood indicators in C2. Reductions in livestock numbers has never been the only indicator against which positive outcomes are measured, or the only target for herders. The extent to which targets were met for each indicator each year are discussed in detail in each AR, and the implications for carbon sequestration etc, as well as livelihoods. Furthermore, it is difficult for herders to suddenly reduce the number of their livestock. However, between 2016 and 2019, the Khongor Ovoo group reduced the number of livestock by 11%, Ikh Am by 13-14%, and Dulaankhairkhan by 15%.</p>
Aster Global Findings - Round 2	<p>The audit team apologizes for the confusion on the Round 1 finding; however, thank you for the clarification related to the where potential negative effects on livelihoods is addressed. The audit team understands that project activities are both reducing livestock numbers while also increasing pasture rotation. Herders who are unable to reduce livestock numbers have the ability to contribute to GHG reductions by increasing their grazing rotations. This criterion is satisfied.</p>

Findings Number	25
Plan Vivo Standard 2013 (Section)	8. PES Agreements (transacting ecosystem services) and benefit sharing
Plan Vivo Standard 2013 (Subsection and Description)	8.9. Details of the benefit-sharing mechanism must be made available to participants in an appropriate format and language.

Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	
Aster Global Round 1 Findings	The audit team was unable to find verifiable evidence to satisfy this criteria.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please provide verifiable evidence to satisfy this criteria.
Round 1 Response from Project Coordinator (DD Month YYYY)	Attachment # 35,36,37.
Aster Global Findings - Round 2	Thank you for providing the producer agreements. The audit team confirms that the project participants have access to their PES agreements in the appropriate language. This criterion is satisfied. No further action is needed.

Findings Number	26
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.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PD Part I5
Aster Global Round 1 Findings	The audit team reviewed the PDD and notes that the project aims to deliver 70% of the sales revenue to the participating communities. However, the audit team was unable to find verifiable evidence that this is being delivered.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please provide detailed financial records of sales revenue and traceable disbursement records demonstrating that this criterion has been satisfied.
Round 1 Response from Project Coordinator (DD Month YYYY)	We deliver 70% of sales revenue to our community account. From 2017 - 2019 we transferred to them following amounts. Arkhangai aimag, Khongor ovoo group - 17 155 000MNT / ~ 6126 USD /, Tuv aimag, Ikh am group - 14420000 / ~ 5150 usd /, Bayankhongor aimag, Dulaankhairhan group - 14 780 000 / ~ 5278 usd /

Aster Global Findings - Round 2	The audit team reviewed bank transfer statements and a MSRM budget showing an allocation of 70% of sales revenue to the project participants. The audit team is reasonably assured that the project is delivering a minimum of 60% of sales revenues to project communities. This criterion is satisfied.
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Findings Number	27
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural -Section	2.2 Stratification of project intervention areas
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural resources management in extensively managed grasslands v0.3 (05 December 2014) - Criteria	Each area or plot of land on which project activities will be implemented should be given a unique ID code, and all relevant physical and management variables recorded so that the characteristics of each numbered plot can be identified in the baseline and with-project scenarios. The geographical location of each area or plot of land should be recorded in the land management plan.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD
Aster Global Round 1 Findings	The audit team was unable to locate spatially explicit files showing unique ID codes. Additionally, the audit team was unable to find shapefiles showing the relevant strata.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please address in line with the finding.

Round 1 Response from Coordinator (DD Month YYYY)	Shapefiles and maps for each of the three sites showing the subdivisions into riparian meadow, mountain steppe, spring and winter etc- in other words the 'strata' set out in Table F1a, A51c and A53C of the PDD - i.e grazing management spreadsheets. These all give areas in hectares for the various vegetation types - these must have been based on some mapping in shapefiles. The 'physical and management' variables is in the main body of the PDD e.g. Sections B2-B4; section C for the socio economic context. Annex 8 of the PDD, 'Climate Benefit Quantification Methodology', Section 2.2... the different carbon sequestration rates for different 'strata'/ land use types have already been supplied to them as part of a spreadsheet linked to the CENTURY model. The grazing management spreadsheets e.g. F1a in PDD also already give the baseline characteristics in terms of grazing pressure for each vegetation type, stocking rates etc. Its worth noting too that these spreadsheets were prepared by the authors of this Climate Benefit Quantification Methodology - and to fulfil its requirements, including for stratification.
Aster Global Findings - Round 2	The audit team reviewed the understands that the maps within the PDD have unique identifiers; however, the provided shapefiles don't have unique shapefiles. Considering this criterion was confirmed at validation and the project area has not been expanded the audit team is reasonably assured this criteria is satisfied.

Findings Number	28
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural -Section	4. Plan Vivo Certificates risk buffer
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural resources management in extensively managed grasslands v0.3 (05 December 2014) - Criteria	Where projects seek to generate Plan Vivo Certificates, the PV Standard requires that where there is a risk of reversal associated with project interventions, a proportion of expected climate services must be held in a risk buffer to protect the project from unexpected reductions in carbon stocks or increases in emissions. An approved approach for assessing risk and defining risk buffers is to be used to estimate the proportion of total net climate benefits during the quantification period to be held in the risk buffer reserve. At each PV project verification event, implementation of project activities and the occurrence of risk events shall be reviewed on the basis of annual monitoring results during the quantification period and other relevant information. Based on the findings of the project verification, the project proponent shall revise estimates of project risks and use the same approved approach to recalculate the proportion of climate benefits to be held in the risk buffer during the subsequent quantification period.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD Part H2

Aster Global Round 1 Findings	The audit team reviewed the PDD and notes that an initial risk assessment is conducted. However, the audit team was unable to find evidence that " the occurrence of risk events shall be reviewed on the basis of annual monitoring results during the quantification period and other relevant information."
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please provide evidence to satisfy this criteria.
Round 1 Response from Project Coordinator (DD Month YYYY)	According to the Climate Benefit Quantification Methodology, as cited here in column C, it is at the project verification stage that the occurrence of risk events shall be reviewed (by the verifiers) on the basis of annual reports and monitoring. These annual reports were all provided to AG as part of the verification process. The verifiers (AG) may then choose to ask the project proponents (MSRM) to revise risk estimates if there is a reason to do so. I think there is a misunderstanding: it is for AG to do this review, not MSRM.
Aster Global Findings - Round 2	As discussed with Uilst, the VVB is not allowed to make assertions about the projects risk. The only role for the VVB here is to assess the risk assessment performed by the project proponent.
Aster Global Requests CAR/FAR/OBS - Round 2	MCAR: Please provide an updated risk assessment in line with this criterion or provide some other form of evidence to demonstrate compliance with this criterion.
Round 2 Response from Project Coordinator (DD Month YYYY)	The biggest risk in Mongolia's nomadic pastoralism is climate risk. There were no natural disasters in 2015-2019. Therefore, herder households spend the winter, spring, summer and autumn within the boundaries of their pastureland use areas. Economically, lower livestock prices due to lower meat exports in 2016-2017 had a negative impact on the reduction in livestock numbers in those years, but increased meat exports between 2017-2019 had a positive impact on increased meat sales. This has had a positive effect on reducing the number of livestock. There are no legal, administrative and social risks. There are some things that have not been done or some things that have not been done. For example, the Ovoot willow in the Ikh Am area was fenced off, but was not implemented. The reason for this was that the area was far from herders' winter and spring camps in winter and spring, and required special security and higher costs. It is planned to grow 200 larch (conifer) seedlings in Khongor Ovoo, but 50-60 seedlings have been prepared. Larch sapling preparation is a long process and continues to be prepared. This has not been achieved as planned. Dulaankhairkhan herder group plans to plant sea buckthorn and vegetables, but facilities such as fencing, special protection and irrigation systems have not been fully implemented. However, some households are planting sea buckthorn, trees and vegetables in their backyards.
Aster Global Findings - Round 3	The audit team confirms that the project has investigated whether or not the risk buffer determined at validation needs to be updated. The VVB agrees that the validated risk assessment is still appropriate. This criterion is satisfied.
Findings Number	29

Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural -Section	5. Monitoring
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural resources management in extensively managed grasslands v0.3 (05 December 2014) - Criteria	All projects must put in place a system for ensuring the quality of monitoring data and for checking the robustness of monitoring results.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	
Aster Global Round 1 Findings	<p>The audit team understands that biannually, MSRM will confirm the data self-reported by the hesegs. The audit team does not understand the full biannual monitoring system of the self reported data. The audit team is requesting additional information regarding this system. Specifically, how are the number of animals from each household/herder group are checked for robustness? Additionally, how are herder movements checked?</p> <p>Additionally, the audit team is requesting records showing the robustness monitoring results.</p>
Aster Global Requests CAR/FAR/OBS - Round 1	<p>MCAR: Please clarify in line with the finding.</p> <p>MCAR: Please provide the results of the robustness monitoring.</p>
Round 1 Response from Project Coordinator (DD Month YYYY)	The number of livestock is calculated based on the results of the official annual census in the soum. In Mongolia, an official livestock census is conducted in December each year. A special Livestock Census Commission from the soum governor's office visits each herder household to count the animals. Based on this, livestock income tax is levied. So this number is more plausible and realistic. It needs to be clear for example that soum records are very accurate based on annual / biannual counts. The number of herders' movements is confirmed by asking bagh leaders.
Aster Global Findings - Round 2	Thank you for the additional clarification. This item is marked pending until the Finding 19.
Aster Global Requests CAR/FAR/OBS - Round 2	

Round 2 Response from Coordinator (DD Month YYYY)	please see the attachment :#46.1,#46.2
Aster Global Findings - Round 3	The audit team reviewed the additional documents provided regarding the biannual monitoring system and is reasonably assured that the monitoring is occurring as described in the PDD. This item is addressed.

Findings Number	30
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural -Section	M1.1 Stratification of grasslands
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural resources management in extensively managed grasslands v0.3 (05 December 2014) - Criteria	As set out in Section 2 of the methodology, stratification of the project intervention area can improve the accuracy of climate benefit estimates. For projects with improved grazing and forage management activities, this is particularly important because changes in soil carbon stocks will be estimated using a carbon model that requires baseline site characteristics and management practices as well as with-project management practices as input parameters. If areas or plots of grassland have different baseline site characteristics (e.g. soil types or degrees of degradation), management histories (e.g. cultivation, grazing), or with-project activities (e.g. changes in grazing duration, cultivation of forage), carbon stock changes will be expected to differ. Therefore, for grassland under grazing or forage management, it is necessary to identify distinct land use strata within each project intervention area.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD
Aster Global Round 1 Findings	Project stratification was confirmed at validation. However, the audit team was unable to locate spatially explicit files showing stratification.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please address in line with the finding.
Round 1 Response from Coordinator (DD Month YYYY)	This is the same issue as raised on relation to 2.2 above. Maps, shape files, showing the different pasture/ vegetation types for each area (riparian meadow; spring, summer etc), with areas matching up with the figures given in the grazing management templates.
Aster Global Findings - Round 2	The audit team reviewed the understands that the maps within the PDD have unique identifiers; however, the provided shapefiles don't have unique shapefiles. Considering this criterion was confirmed at validation and the project area has not been expanded the audit team is reasonably assured this criteria is satisfied.

Findings Number	31
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Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural -Section	M1.4 Project emissions and removals
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural resources management in extensively managed grasslands v0.3 (05 December 2014) - Criteria	Project emissions from management of natural grasslands and perennial forage in each project intervention area a during the quantification period are calculated as:
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD, Annual Reports, KEY C calculations documents

Aster Global Round 1 Findings

The audit team reviewed the carbon calculation worksheets and documents and noted the following errors.

1. In the Key C calculation documents multiple of the per ha carbon sequestration rates are incorrect. Specifically, truncated values are used.
2. In Key C calculation documents for the Ikh am heseg in Year 1 there appears to be no carbon sequestered; however, in the same region in the steppe winter strata in year 2 there is carbon sequestered. The audit team does not understand why in one year there would be carbon sequestered and not the other year when the "average number of sheep units/total number of sheep units that can be grazed" is less than 1 in both cases with a recommended biomass utilization rate (%) equals 0.5. Please note that this occurs in other hesegs as well and it is unclear why.
3. The audit team was unable to locate a workbook or calculation flow showing how the number of the different kinds of animals reported at the heseg level is converted to sheep units.
4. In the Grazing management template 20210510 Astor Global.xlsx workbook, the audit team noted that the yield (kg DM ha) values for multiple hesegs are variable from year to year. It is unclear why this is and what these values are based on.
5. In the Grazing management template 20210510 Astor Global.xlsx workbook in the Mountain Steppe strata for the Hongor Ovoo heseg, the dates for the "fall" and "summer/fall" appear to overlap. It is unclear how this is possible. This appears to also occur in other hesegs and other strata.
6. When comparing the Table 5 with biomass.xlsx workbook and Grazing management template 20210510 Astor Global.xlsx workbook, the dates for the different seasons do not align. It is unclear to the audit team how this is appropriate.
7. During the review of the Key C calculation documents the audit team found multiple multiplication and addition errors in these documents.
8. During the site visit numerous project participants expressed concern that while they are implementing their management plans and understand the requirements, there are herders moving into their grazing areas and degrading the pastures they are trying to restore. The audit team does not understand how the project design addresses this concern. Of important concern is that the carbon storage estimations above the baseline may be overstated.
9. The audit team reviewed the Table 5 with biomass.xlsx workbook It is unclear where the values in columns C and E are derived from. Additionally, it is unclear why these values are multiplied by 10.

<p>Aster Global Requests CAR/FAR/OBS - Round 1</p>	<p>MCAR: Please use the correct validated per hectare carbon sequestration rates. Additionally, please update all downstream calculations and Annual Reports.</p> <p>MCAR: Please clarify the discrepancy noted in Finding 2. Additionally, further clarification is needed regarding using a recommended biomass utilization rate (%) equal to 0.5 and carbon sequestration is conservatively assumed to be 0.</p> <p>MCAR: Please provide evidence showing the number of reported animals (and their types) and the quantification of the average number of sheep units.</p> <p>MCAR: Please clarify why the yield (kg DM ha) values change from year to year. If these numbers were supposed to change please provide verifiable evidence that supports the use of these values. If these values were not supposed to change please update the carbon quantification and annual reports.</p> <p>MCAR: Please clarify in line with Finding 5.</p> <p>MCAR: Please clarify in line with Finding 6.</p> <p>MCAR: Please check all the quantification in the Key C calculation documents and update the calculations as necessary. Additionally update the annual reports to reflect changes in the carbon sequestration during each year.</p> <p>MCAR: Please clarify how the issue noted in Finding 8 is mitigated through the project design. Additionally, please clarify how carbon storage benefits are not overstated in light of the findings from the Site Visit.</p> <p>MCAR: Please clarify in line with Finding 9.</p>
<p>Round 1 Response from Project Coordinator (DD Month YYYY)</p>	<p>1. PV were quite content with rounded up figures in ARs, rather than several decimal places. To the best of our understanding it is also not possible to update or edit ARs once PV have officially approved and published these on their website. It would be possible to calculate any differences using decimal places would make (how many do you want us to go to?) - and make any adjustments in the next AR. 2) This document is just a summary. Whether or not carbon is sequestered also depends on biomass for example - all of which information is provided in the grazing management templates for each site and in each AR. 0.5% biomass utilisation rate means 50% biomass removal (grazing). As the CENTURY models and outputs show any carbon sequestration is likely to be very minimal above this rate. Hence, we took the decision in consultation with the modellers and PV to conservatively assume no carbon sequestration above this rate.</p>

Aster Global Findings - Round 2	<p>Thank you for the clarification. The VVB consulted Plan Vivo on whether the modeling needed to be updated based on updated yield values. Plan Vivo confirmed that the modeling does not need to be re-run for this verification.</p> <p>Furthermore, the audit team clarified the other findings (not related to updating the model parameters) with the project proponent and confirmed that the calculations have been updated in-line with all of the VVB's Corrective Action Requests. These CARs are closed, no further action is needed.</p>
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Findings Number	32
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural -Section	Module 3: Accounting for expected leakage emissions
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural resources management in extensively managed grasslands v0.3 (05 December 2014) - Criteria	Module 3: Accounting for expected leakage emissions
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD, Annual Reports, Site Visit Findings
Aster Global Round 1 Findings	<p>The PDD states "If during the initial commitment period, any households move outside the project area for significant periods of time, and where this was not established practice under the baseline scenario, this will be negotiated with local administrations in the appropriate areas. LA in receiving areas will be made aware of the incomers' Plan Vivo commitments and may wish to negotiate a proportion of PV benefits as compensation for pasture use in non-project areas under such circumstances."</p> <p>The audit team was unable to find evidence that this information was collected during the monitoring period. As a result, it is impossible to make this determination.</p>
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please provide evidence that demonstrates leakage above the baseline level is not occurring.

Round 1 Response from Coordinator (DD Month YYYY)	Please see response below. This question is addressed there.
Aster Global Findings - Round 2	This item is marked pending until finding 21 is closed.
Aster Global Requests CAR/FAR/OBS - Round 2	
Round 2 Response from Coordinator (DD Month YYYY)	
Aster Global Findings - Round 3	The Project Proponent provided three documents signed by the Soum Governors stating that no outside livestock came into the grazing pastures. The audit team is reasonably assured that leakage above the baseline scenario is not occurring.

Findings Number	33
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural -Section	Module 3: Accounting for expected leakage emissions
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural resources management in extensively managed grasslands v0.3 (05 December 2014) - Criteria	It is not reasonable to expect project proponents to undertake field surveys in areas outside the project boundary to monitor grazing displacement. Therefore, the approach to estimating leakage depends on estimation of the number of animal unit months (AUM) of grazing displaced and estimation of the area affected by grazing displacement, based on which loss of soil carbon stocks is estimated. Estimates of baseline grazing activity should derive from baseline surveys. Estimates of project scenario grazing activity should derive from land management plans described in the PDD.
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	Project Files
Aster Global Round 1 Findings	The audit team was unable to find the leakage analysis that was performed at validation.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please provide the leakage analysis that follows Module 3 of the Methodology.

Round 1 Response from Project Coordinator (DD Month YYYY)	The leakage analysis in Module 3 is for ex ante calculation of leakage. The project areas included all the typical seasonal pastures used by participants in each site. There was no specific, quantifiable aspect of leakage that could reasonably be calculated ex ante. As stated in the PDD, occasional longer distance movements (otor) are a traditional aspect of Mongolian pastoralism, which the project did not seek to curtail—that would have been culturally inappropriate. These may be undertaken relatively opportunistically, depending on seasonal climate and vegetation conditions in some years, but may not happen at all in others, so it's not possible to say these are likely to happen in advance for any given period (a criteria for using the ex ante calculation). Meaningful ex ante calculations were not feasible. Instead the project took account of actual leakage (ex post) based on reported movement patterns. Provisions were put in place in the PDD for large scale otor movements to be compensated in receiving areas, through claiming a portion of PV funds. However, such large scale organised movements did not occur during the project period.
Aster Global Findings - Round 2	This item is marked pending until finding 21 is closed.
Aster Global Requests CAR/FAR/OBS - Round 2	
Round 2 Response from Project Coordinator (DD Month YYYY)	
Aster Global Findings - Round 3	The Project Proponent provided three documents signed by the Soum Governors stating that no outside livestock came into the grazing pastures. The audit team is reasonably assured that leakage above the baseline scenario is not occurring.

Findings Number	34
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural -Section	Estimation of annual carbon stock changes:
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural resources management in extensively managed grasslands v0.3 (05 December 2014) - Criteria	Eq: II.1

Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	PDD
Aster Global Round 1 Findings	The audit team was unable to determine where this equation is applied.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please clarify for the audit team where this equation is applied.
Round 1 Response from Project Coordinator (DD Month YYYY)	As previously explained, the calculation and modelling of carbon sequestration under different grazing scenarios and using the CENTURY model was outsourced to a specialist consultancy - who also prepared this methodology, which was approved by PV. It is this consultancy who applied the various equations. A spreadsheet supplied previously shows these parameters as derived from the CENTURY modelling for this project (Table 5 with biomass).
Aster Global Findings - Round 2	The VVB consulted Plan Vivo on whether the modeling needed to be updated based on updated yield values. Plan Vivo confirmed that the modeling does not need to be re-run for this verification and thus the values determined at validation are appropriate. This item is closed, no further action is needed.

Findings Number	35
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural -Section	Quantification of uncertainty:
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural resources management in extensively managed grasslands v0.3 (05 December 2014) - Criteria	The PV Standard requires that uncertainty is quantified and factored into the conservativeness applied in the quantification of climate benefits. Firstly, project proponents should plan to diminish uncertainty in the process of planning data collection, in particular by stratifying grasslands into distinct land use strata; ensuring sufficiently high sampling intensity in each land use stratum for key model input parameters; and ensuring that good laboratory analysis procedures are followed. Secondly, the project proponent must estimate the uncertainty of the model output values, by calculating the model response using the model input parameters with the upper and lower confidence levels as set out in the steps below:
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	Project Files

Aster Global Round 1 Findings	<p>The audit team was unable to find a workbook that shows the calculation of uncertainty.</p> <p>Additionally, it is unclear to the audit team how and if actual climate data from the project areas is factored into the uncertainty calculation.</p>
Aster Global Requests CAR/FAR/OBS - Round 1	<p>MCAR: Please provide a workbook demonstrating the calculation of uncertainty.</p> <p>MCAR: Please clarify if actual climate data collected during the monitoring period is factored into the calculation of uncertainty.</p>
Round 1 Response from Project Coordinator (DD Month YYYY)	<p>The response here is as above: all these calculations were performed by the specialist consultancy who developed and applied the methodology to the satisfaction of PV. MSRM do not have standalone workbooks. The modelling of and deductions due to modelled uncertainty are again evident in 'Table 5 with biomass' as previously supplied and which constitutes a key output of the modelling. In response to whether climate data collected during the monitoring period is factored in, then no. This would require re running of the CENTURY model on an annual/ biannual basis, which was never intended and is outwith the scope of the project - and the approved methodology. As set out in the PDD parameters such as biomass, movement patterns, grazing pressure etc are monitored annually and fed into annual calculations (e.g. grazing management templates, such as F1A in the PDD, updated in each AR with the actual figures for that year). Climate data was fed into the initial calibration and running of the model.</p>
Aster Global Findings - Round 2	<p>The VVB consulted Plan Vivo on whether the modeling needed to be updated based on updated yield values. Plan Vivo confirmed that the modeling does not need to be re-run for this verification and thus the values determined at validation are appropriate. This item is closed, no further action is needed.</p>

Findings Number	36
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural -Section	Step 1: Calculate the values for all input parameters at the upper and lower confidence limit.
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural resources management in extensively managed grasslands v0.3 (05 December 2014) - Criteria	Eq: II.2

Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	
Aster Global Round 1 Findings	The audit team was unable to find a workbook that shows the calculation of uncertainty.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please provide a workbook demonstrating the calculation of uncertainty.
Round 1 Response from Project Coordinator (DD Month YYYY)	Response as above - this appears to be the same question.
Aster Global Findings - Round 2	The VVB consulted Plan Vivo on whether the modeling needed to be updated based on updated yield values. Plan Vivo confirmed that the modeling does not need to be re-run for this verification and thus the values determined at validation are appropriate. This item is closed, no further action is needed.

Findings Number	37
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural -Section	Calculate total project emissions in each project intervention area during the quantification period:
Plan Vivo Climate Benefit Quantification Methodology - Carbon sequestration through improved grassland and natural resources management in extensively managed grasslands v0.3 (05 December 2014) - Criteria	Eq:II.11
Requirement Met (Y, N, or NA)	Y
Location in PDD or Supporting Documents	Key C Calculation word docs
Aster Global Round 1 Findings	This equation is applied correctly; however, the audit team was unable to verify the area of each stratum.
Aster Global Requests CAR/FAR/OBS - Round 1	MCAR: Please provide the validated shapefiles showing the area of each region.
Round 1 Response from Project Coordinator	Project shapefiles showing the area of each region were sent.

(DD Month YYYY)	
Aster Global Findings - Round 2	The audit team reviewed the understands that the maps within the PDD have unique identifiers; however, the provided shapefiles don't have unique shapefiles. Considering this criterion was confirmed at validation and the project area has not been expanded the audit team is reasonably assured this criteria is satisfied.