SCS global SERVICES

Final CCBA Project Validation Report V3-1

CORDILLERA AZUL NATIONAL PARK REDD PROJECT

19 FEBRUARY 2013

Assessment Conducted by:

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1. Executive Summary

This report presents the findings of an assessment conducted by SCS Global Services (SCS), to confirm the claim that the Cordillera Azul National Park REDD Project ("the Project") conforms to the Climate, Community and Biodiversity Project Design Standards (Second Edition) at the Gold level. SCS has been approved by the Climate, Community & Biodiversity Alliance (CCBA) to provide such assessment services. The process consisted of a thorough desk review of project documentation, including contracts and carbon accounting workbooks. In addition the audit team performed a site visit in order to visit portions of the project area, conduct interviews with communities and other stakeholders, and evaluate the quality of the project's management systems.

1.1. Objective

The validation audit is an independent assessment by SCS of the proposed project activity against the assessment criteria. Validation has resulted in a conclusion by SCS as to whether the project activity is compliant with the assessment criteria and whether the project should be approved to the CCB Standards.

1.2. Scope and Criteria

The scope of the audit consisted of the project, its activities, and its geographic extent, as described within the Project Design Document (PDD). The assessment was conducted against the criteria set out within the following guidance documents:

- Climate, Community and Biodiversity Project Design Standards, Second Edition ("CCB Standards")
- Rules for the use of the Climate, Community & Biodiversity Standards, Version 21 June 2010 ("CCB Standards Rules")

The project was assessed against all required criteria of the CCB Standards in order to determine whether the project could be validated at the "Approved" level. In addition, the project was assessed against at least one optional criterion, as set out by the CCB Standards, in order to determine whether the project could be validated at the "Gold" level.

1.3. Level of Assurance

SCS performed this assessment based on the guidance described by the Rules for the Use of the CCB Standards to determine whether there is a reasonable level of assurance that the project design addresses each requirement of the CCB Standards.

1.4. Summary Description of the Project

The Cordillera Azul National Park (PNCAZ) unplanned frontier deforestation REDD project is located in Central Peru in the Department of: San Martín, Ucayali, Huánuco, and Loreto. The Project Zone encompasses 2,303,414.75 hectares. The project area comprises 1,351,963.85 hectares ranging from lowland forests (300 meters) to high mountain forests (2400 meters). The park was established in 2001 by order of supreme decree of the Peruvian government; however, given the current financial constraints and the inability of the local governments to enforce the rules of the park, deforestation remains a real and verifiable threat in the region. Recent mass immigration into the area has magnified the need for greater park management and protection. In 2008, Centro de Conservación, Investigación y Manejo de Áreas Naturales-Cordillerra Azul (CIMA-Cordillera Azul) voluntarily signed a 20 year full management contract with SERNANP. This contract gives CIMA legal authorization to use revenues from the sale of carbon credits to fund park protection; however ownership of the land remains with the Peruvian government.

The remote location of the park, along with the unique landscape conditions has resulted in massive speciation; featuring majestic canopy trees, medicinal herbs, and a suite of charismatic mega fauna. In 2000, the Field Museum completed a rapid biological inventory estimating 4000-6000 plant species, 71 large mammal species, 590 bird species, 58 species of amphibians, 26 reptile species, and 150 species of fish. While Peru is known as a biodiversity hotspot, the park itself boasts a very high level of endemism, with a number of species being new to science.

While no human communities are located within the boundaries of the park, there were a number of ownership claims during the planning phase of the project. All legal claims have been recognized and no legitimate disputes currently exist. A large and growing number of communities do, however reside outside of the park borders. The total population of the districts comprising the Project Zone is 270,000, with an estimated 180,000 people located within the buffer zone. Traditionally, local communities rely on slash and burn agricultural practices for subsistence. These practices, combined with the large influx of immigrants have resulted in increased risk of deforestation within the park boundaries. In addition to the known communities in the buffer zone, the possibility of a non-contacted indigenous people exists in the southeast region of the park. While much of the evidence of their existence is anecdotal, CIMA is directing management cautiously and assuming they are indeed present. Given the history of these people, who wish to remain un-contacted; a strict zone of protection (Zona de Proteccion Estricta) was created in this area of the park to prohibit outside entry or use.

It is estimated that the Cordillera Azul National Park unplanned deforestation REDD project (Project) will avoid 15,752,683 tCO2e over the 10 year baseline period through the prevention of illegal logging and reduction of deforestation from agricultural conversion. This "without project" scenario is consistent with common practice within the reference region. The majority of the revenue from sale of carbon credits will be used to maintain the project and to create an endowment ensuring project funding in perpetuity. The remaining revenue will be distributed to the Peruvian government.

The project has committed to employ people from communities within the buffer zone in order to develop a strong relationship between the project and conservation. While a complete description of

the project activities can be found in the project design document, the three main goals of the project for avoiding deforestation include:

- Strengthening the park protection strategy.
- Using a participatory model to engage communities and other stakeholders in the management and financial sustainability of the park.
- Building local capacity for sustainable land use and improving the quality of life in the buffer zone communities (text copied directly from the Cordillera Azul National Park REDD Project PDD)

2.0 Methodology

SCS began reviewing the project in September 2012, beginning with a desk audit of the PDD and associated documentation. As part of this review, the audit team undertook a thorough review of the PDD against all indicators of the CCB Standards.

This review was continued during the site visit (22 October – 6 November 2012), during a joint assessment under the Verified Carbon Standard and the REDD methodology VM0007. During this visit, the audit team interviewed CIMA Representatives Patricia Fernández-Dávila, Cinthia Mongylardi, Tatiana Pequeño, Jorge Aliaga, and Jorge Luis Martinez, as well as the implementing partners from The Field Museum Christina Magerkurth and Debby Moskovits, and government officials. In addition, the audit team conducted interviews with representatives from the communities of Vista Alegre, Chambira, Simon Bolivar, Santa Rosa de Chipaota/Mushukllacta , Canayo, San Juan, Yamino, Challual, and La Juanita (27 October – 6 November 2012). The audit team conducted in-depth investigation into the project design and its conformance to the validation criteria, as well a risk-based assessment of the control systems of the project (particularly those related to the provision of quantitative information related to carbon stock changes and GHG emissions, as required by G1.4, G2.3, CL1 and CL3). The audit team also conducted interviews with representatives of 10 communities, resident within the Project Zone in order to determine, in particular, the level of effectiveness of the project with respect to community engagement (G3.8, G3.9, and G3.10). In addition, the audit team sought to understand the histories, livelihoods and goals of the communities visited, in order to confirm that the project will deliver net benefits to these communities (CM1.1).

As described in Section 3.1 of this report, findings were issued during and subsequent to the site visit. Following the closure of all findings, the audit team has been able to proceed with the issuance of the validation opinion described in Section 1.6 of this report.

2.1. Auditor Qualifications

Lead Auditor: Christie Pollet-Young, SCS Global Services GHG Program Manager

Ms. Pollet-Young is the Manager of SCS's Greenhouse Gas Verification Program who has over 15 years of experience in forestry, ranging from forest ecology research, conservation planning, and carbon offset verification in both tropical and temperate climes. Prior to her tenure at SCS, Ms. Pollet-Young worked for the Smithsonian Institution's Center for Tropical Forest Science where she oversaw a network of forest dynamics plots throughout the tropics and The Nature Conservancy of Peru where she developed an ecoregional plan for the conservation of the Peruvian montane forests. Ms. Pollet-Young completed a Master of Forest Science from Yale University and graduated with high honors from the University of California, Berkeley with a Bachelor of Science in Environmental Science, Policy and Management and a minor in forestry. Ms. Pollet-Young is a lead auditor with SCS who has participated in the validation or verification of over 40 forest carbon offset projects around the globe under the Climate Action Reserve, the Verified Carbon Standard, the American Carbon Registry, and the Climate, Community and Biodiversity Standards. In addition, Ms. Pollet-Young is a VCS AFOLU expert in Improved Forest Management, and a 2010 winner of a CARROT award from the Climate Action Reserve.

Auditor: Francis Eaton, SCS Global Services Verification Forester

Francis Eaton holds a Masters of Forest Science from the Yale School of Forestry and Environmental Studies and received his B.S. in Forestry from Northern Arizona University. The focus throughout his studies was forest management with emphases on sampling design and statistical analysis. His studies in the Southwest United States were concentrated in ecological restoration, range management, and fire ecology. He spent three years working collecting field data and completing data analysis on forest restoration projects utilizing thinning treatments and prescribed fire with the Ecological Restoration Institute. His work experience also includes complete biophysical inventories, estimation of timber volume, and wildfire risk assessments for two 3000 acre properties, as a forest consultant in northern New Mexico. Mr. Eaton is well versed in editing sampling designs and auditing field campaigns as a teaching fellow for masters-level management plan courses. Mr. Eaton currently works as a verification forester for SCS and has experience auditing AFOLU projects under the Verified Carbon Standard and Climate, Community, and Biodiversity Alliance standards, as well as Improved Forest Management projects under the standards of the Climate Action Reserve. In addition to his forestry background, Mr. Eaton has spent over a decade working in the cattle production industry for the second largest cattle operation in the U.S.

Technical Expert: Jazmín Gonzales Tovar

Jazmín Gonzales Tovar holds two degrees in environmental sciences from very prestigious programs in Peru and Europe. Miss Gonzales received her undergraduate degree with honours from Universidad Nacional Agraria La Molina (Perú), and her Masters of Environmental Sciencies (with a major in Environmental Policy and a minor in Rural Development Sociology) from Wageningen University and Research Centre - WUR (The Netherlands). Her professional experience focuses on social-environmental issues in developing countries, covering the public and private sectors, international cooperation, NGOs and the academic community. She developed experience in social-environmental policy and stakeholders analysis tools such as discourse analysis and interviewing, applying them in several works. She made two research works about adoption of sustainable agricultural practices: first in the Buffer Zone of the Yanachaga-Chemillen National Park in the Peruvian Amazon region (as part of Instituto del Bien Común, for Deutscher Entwicklungsdienst), and more recently in Uzbekistan (as part of WUR, for the Uzbek government). Additionally, in her major master thesis for WUR she collected primary data to analyze the information flow in social-environmental conflicts in the tropical forest zones of Peru and Nigeria. She has also participated in other works such as the economic environmental valuation of the climate change effects in Peru for the XV UN Climate Change Summit in Copenhagen, the strategic environmental assessment of agro-exports and agro-industry in Piura and Lambayeque and the Peruvian biodiversity monitoring and evaluation system. In the last year she performed in the Ministry of Education of Peru working on formal environmental education policies.

Technical reviewer: Larry Wilson, SCS Global Services Verification Forester

Mr. Wilson holds a Bachelor's degree in Ecology and a Master's degree in Forestry, and is a Registered Professional Forester in California, RPF # 2563. He has 18 years' experience as a forest biometrician and growth and yield modeling specialist. Mr. Wilson has worked for the USDA Forest Service as vegetation modeling specialist on several regional scale ecosystem management analysis projects dating back to 1993 and has 5 years experience with a major forestry consulting firm working primarily with private industry. He is also an accomplished database analyst and computer programmer. Mr. Wilson's areas of expertise include forest inventory data processing, stand based forest inventory management, growth and yield simulation modeling, development of computerized calculation and classification algorithms, and systems analysis. Mr. Wilson is accredited by the California Air Resources Board as Lead Offset Verifier of Offset Project Data Reports and is also certified by the Board in the US Forest Project and Urban Forest Protocols. He is also certified as Lead Verifier under the Climate Action Reserve and has successfully completed Lead Auditor Training under ISO 9001:2008.

2.2. Audit Process

The audit process included the following steps:

- Kick-off meeting with the Field Museum and CIMA (via phone conference).
- Desk review of initial documentation, including the Project Design Document (PDD), preliminary models, and project background descriptions.
- Discussions (via phone conference) between SCS and The Field Museum about the project documentation
- Site visit between October 22 and November 6th, that included:
 - Project overview by CIMA and the Field Museum.

- Meetings at the CIMA office in Lima to discuss the PDD, including discussions of the baseline, the communities in the Project Zone and the non-permanence risk rating.
- Meetings with Peruvian government officials, Lucia Ruiz Ostoic (MINAM) and Pedro Gamboa (SERNANP).
- Meetings at National Park Headquarters in Tarapoto including park guards, community members, and the head of Cordillera Azul National Park.
- Review of quality system and data processing in Tarapoto.
- Interviews with communities in the buffer zone.
- Carbon inventory assessment in Shapaja and Ushpayacu.
- Issuance of findings
- Continued document review, review of finding responses, closure of findings, and report preparation
- Internal review and approval of the draft validation report
- Issuance of the draft validation report to CIMA
- Issuance of the final validation report to CIMA and the CCBA

3.0 Stakeholder Comments

The Project Design Document (PDD) was posted on the CCBA website on the 20th of September, 2012 and the public comment period extended through 25th of January, 2013. Comments were received from 11 community representatives and other stakeholder parties (see Appendix B).

Written comments were received from the following stakeholders:

- Gladys Ruiz Galino
- Remigio Garcia Linares
- Wilfredo Amasifuen Limos
- Neli Angulo Logia
- Segundo Moises Pino Bolivar
- Alberto Sangama Chashnomonte
- Luis Sanchez Armas
- Salomon Huranacca Antonio
- Alfredo Arias Pareja
- Julisa Rivera Bazán
- Humberto Becerra Nuñez

All comments have been addressed by the auditor in this report. General themes included:

- General understanding of the project design and objectives
- Appreciation of the project

3.1. Review of CCB Requirements

This assessment report addresses each of the CCBA criteria and indicators. For each criterion, the CCBA indicators are listed along with a description of the evidence that was considered. When assessing the conformance of each indicator to the CCB Standards, SCS may issue findings to the Project Proponent. These findings can include Non-Conformity Reports (NCRs), Opportunities for Improvement (OFIs) and New Information Requests (NIRs), and are compiled in Section 5. In the case of non-conformance, a Non-Conformity Report stipulates the deficiency and its relation to the CCB protocol. NCRs indicate broad non-conformance at the criterion level that must be satisfied prior to project validation. An Opportunity for Improvement is issued when overall conformance with a criterion has been achieved but in instances where actions could be taken to further ensure compliance with an indicator. A New Information Request indicates when additional information is necessary to complete the validation.

3.2. General Section

The General Section of the CCB Standards addresses original conditions in the project are baseline projections, project design and goals, management capacity and best practices, and legal status and property rights.

3.2.1. G1 – Original Conditions in the Project Area

The original conditions at the project area and the surrounding Project Zone before the project commences must be described. This description, along with baseline projections (see G2), will help to determine the likely impacts of the project.

G1 - Original Conditions in the Project Area

Indicator 1 - The location of the project and basic physical parameters (e.g., soil, geology, climate).	SCS was able to confirm the information provided in the PDD during the desk review and through ground truthing during the site visit.
Conformance - Y	

Indicator 2 - The types and condition of vegetation within the project area.	During the site visit, the audit team was able to confirm the description of vegetation provided by the
	project documents. Observations in and around the

Conformance - Y	Project Zone, along with conversations with park guards were generally consistent with results provided
	by the Rapid Biological Inventory of the park (Alverson 2001).

Indicator 3 - The boundaries of the project area and the Project Zone. Conformance - Y	The audit team was able to confirm the boundaries of both the project area and the Project Zone during the time spent on site and found them to be in agreement with the evidence provided in the PDD.
	The Project Zone consists of the project area and the buffer zone. A leakage belt was established to monitor the effect of the project activities outside of the park. While in Peru, government officials corroborated documentation of these boundaries provided to the audit team.

Indicator 4 - Current carbon stocks within the project area (s), using stratification by land-use or vegetation type and methods of carbon calculation (such as biomass plots, formulae, default values) from the Intergovernmental Panel on Climate Change's 2006 Guidelines for National GHG Inventories for Agriculture, Forestry, and Other Land Use or a more robust and detailed methodology. Construction of the transmission of transmission of the transmission of the transmission of the transmission of transmission of the transmission of the transmission of transmissi		
stocks and was able to confirm the accuracy of the	Indicator 4 - Current carbon stocks within the project area(s), using stratification by land-use or vegetation type and methods of carbon calculation (such as biomass plots, formulae, default values) from the Intergovernmental Panel on Climate Change's 2006 Guidelines for National GHG Inventories for Agriculture, Forestry, and Other Land Use or a more robust and detailed methodology.	Carbon stocks within the project area were determined on a per hectare basis for each forest type using the VCS VM0007 methodology. While a few deviations from the methodology were detected, all variations were explained within the VCS project description and referenced in the PDD. The audit team agrees that the methods used are more robust and detailed the IPCC 2006 guidelines for AFOLU projects. In addition to thorough examinations of project spreadsheets, the audit team performed a sample inventory of carbon stocks and was able to confirm the accuracy of the
Conformance -Y values reported in the PDD.	Conformance -Y	values reported in the PDD.

Indicator 6 - A description of current land use and customary and legal property rights including community property in the Project Zone, identifying any ongoing or unresolved conflicts or disputes and identifying and describing any disputes over land tenure that were resolved during the last ten years (see also G5).	The project documentation includes an accurate description of current land use and customary and legal property rights in the Project Zone. MOU's between CIMA and the few land title holders in the project area were presented during the desk review ensuring that no current disputes exist.
Conformance - Y	The project area is a national park, meaning that the land and the resources therein belong to the government of Peru. Areas outside the park; however, there are under constant immigration pressures. While performing interviews with community members in the Project Zone, the audit team observed evidence of project activities working to mitigate these pressures.

Indicator 7 - A description of current biodiversity within the Project Zone (diversity of species and ecosystems) and threats to that biodiversity, using appropriate methodologies, substantiated where possible with appropriate reference material.	The project documentation, including a large scale rapid biological inventory (Alverson 2001) provides an adequate description of the current biodiversity in the Project Zone. The methodologies employed follow the guidance provided by the CCBA SBIA part III. The audit team determined this information to be appropriate and supported by their observations in the field and through their interviews with the Project Proponents and members of the local community.
Conformance - Y	

Indicator 8 - An evaluation of whether the Project Zone includes any of the following High Conservation Values (HCVs) and a description of the qualifying attributes:	While the standards refer to the definition of HCVs provided by the HIGH Conservation Value Resource Network, assessing the evaluation of HCVs requires professional judgment on the part of the audit team. Evidence provided in the PDD is consistent with observations made by the audit with our technical understanding of HCVs.

Indicator 8.2 - Globally, regionally or nationally significant large landscape-level areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance;	Through on site observations and interviews, the audit team was able to confirm that the unique geology of the project has created an array of unique ecosystems that provide habitat to a host of special status biological communities.
Conformance - Y	

Indicator 8.3 - Threatened or rare ecosystems	Claims made by the PDD are consistent with the professional knowledge of the audit team.
Conformance - Y	

ecosystem services (e.g., hydrological services, erosion control, fire control);assessment confirmed the claims in the pr documentation. The vast expanse of conti canopy and the positioning of the project a protecting this area will provide a suite of services including hydrological services, er control, and fire control.	ie project ontiguous forest ject area e of ecosystem s, erosion
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Indicator 8.5 - Areas that are fundamental for meeting the basic needs of local communities (e.g., for essential food, fuel, fodder, medicines or building materials without readily available alternatives); and Conformance - (Y/N/NA)	The audit team was able to interview representatives form communities throughout the buffer zone. Community members verified the claims in the project documentation that the project area meets the criteria of this indicator. Additional evidence confirming these claims was reviewed in the RBI (Alverson 2001).

Indicator 8.6 -Areas that are critical for the traditional cultural identity of communities (e.g., areas of cultural, ecological, economic or religious significance identified in collaboration with the communities).	Claims made in both the project documentation and during conversations with the Project Proponents with respect to the presence of areas critical to the cultural identity of communities were confirmed through interviews with communities is the Project Zone.
Conformance - Y	

3.2.2. G2 – Baseline Projections

A baseline projection is a description of expected conditions in the Project Zone in the absence of project activities. The project impacts will be measured against this 'without-project' reference scenario.

The Project Proponents must develop a defensible and well-documented 'without-project' reference scenario that must:

G2 - Baseline Projections

Indicator 1 - Describe the most likely land-use scenario in the absence of the project following IPCC 2006 GL for AFOLU or a more robust and detailed methodology, describing the range of potential land use scenarios and the associated drivers of GHG emissions and justifying why the land-use scenario selected is most likely.	As described in the PDD, VCS methodology VM0007 was used to determine the baseline scenario. The audit team affirms that this methodology is a more robust and detailed methodology than the IPCC 2006 GL for AFOLU, as it provides guidance that is specific to projects that reduce emissions from deforestation and forest degradation. The audit team was able to confirm that the methodology was appropriately applied and agree
Conformance - Y	with the assertion of continued deforestation activities that occurred prior to CIMA's presence in the region.

Indicator 2 - Document that project benefits would not have occurred in the absence of the project, explaining how existing laws or regulations would likely affect land use and justifying that the benefits being claimed by the project are truly 'additional' and would be unlikely to occur without the project.	The audit team was provided with claims that while the National Park Legislation considers deforestation activities "illegal", that regional authorities do not have the finances to enforce these laws. During the site visit to Lima, the audit conducted interviews with government officials who were able to corroborate these claims. Moreover, comments received from community representatives reinforced these claims

changes associated with the 'without project' reference scenario described above. This requires estimation of carbon stocks for each of the land- use classes of concern and a definition of the carbon pools included, among the classes defined in the IPCC 2006 GL for AFOLU.19 The timeframe for this analysis can be either the project lifetime (see G3) or the project GHG accounting period, whichever is more appropriate. Estimate the net change in the emissions of non-CO2 GHG emissions such as CH4 and N20 in the 'without project' scenario. Non-CO2 gases must be included if they are likely to account for more than 5% (in terms of CO2-equivalent) of the project's overall GHG impact over each monitoring period.	'without project' scenario have been estimated, for the project GHG accounting period, using VCS methodology VM0007. The audit team affirms that this methodology satisfies the requirements of this indicator. Through a thorough review of relevant spreadsheets, remote sensing imagery and processes and other relevant information, the audit team confirmed the accuracy of the values reported within the PDD as part of the validation audit for the project under the VCS. While one variation (termed "methodology deviations" within the lexicon of the VCS) from the selected methodology were applied, the variation has been appropriately explained within the VDD.
GHG emissions (such as those reducing emissions from deforestation and forest degradation (REDD), avoiding conversion of non-forest land, or certain improved forest management projects) must include an analysis of the relevant drivers and rates of deforestation and/or degradation and a description and justification of the approaches, assumptions and data used to perform this analysis. Regional-level estimates can be used at the project's planning stage as long as there is a commitment to evaluate locally- specific carbon stocks and to develop a project-	Additionally, the audit team found the projects exclusion of Non-CO2 emissions, such as CH4 and N2O, to be in accordance with VCS methodology VM0007 module E-BB. Thus, the Project is in conformance with this indicator.
specific spatial analysis of deforestation and/or degradation using an appropriately robust and detailed carbon accounting methodology before the start of the project. Conformance - Y	

Indicator 4 - Describe how the 'without project' reference scenario would affect communities in the Project Zone, including the impact of likely changes in water, soil and other locally important ecosystem services.	The project documentation provides an adequate description of how the 'without project' scenario would affect communities in the buffer zone. The audit team found this description to be in agreement with observations made by the audit team on site.
Conformance - Y	

Indicator 5 - Describe how the 'without project'	The PDD provides an adequate description of
reference scenario would affect biodiversity in the	biodiversity in the 'without project' scenario. The audit
Project Zone (e.g., habitat availability, landscape	team was able to observe areas of deforestation outside
connectivity and threatened species).	of the project area. The audit team submits that
	biodiversity is highly correlated with forest health and
	fragmentation of such will have deleterious effects.
	Interviews with community members also supported
Conformance - Y	this claim in the PDD

3.2.3. G3 – Project Design and Goals

The project must be described in sufficient detail so that a third-party can adequately evaluate it. Projects must be designed to minimize risks to the expected climate, community and biodiversity benefits and to maintain those benefits beyond the life of the project. Effective local participation in project design and implementation is key to optimizing multiple benefits, equitably and sustainably. Projects that operate in a transparent manner build confidence with stakeholders and outside parties and enable them to contribute more effectively to the project.

G3 - Project Design and Goals

Indicator 1 - Provide a summary of the project's major climate, community and biodiversity objectives.The PDD provides an adequa projects' major climate, com objectives. The summary is o interviews with the Project F by interviews with communi project participants such as	te summary of the munity, and biodiversity onsistent with the proponent and supported ty members and other park guards during the site
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Indicator 2 - Describe each project activity with expected climate, community and biodiversity impacts and its relevance to achieving the project's objectives. Conformance - Y	Evidence presented during the office meeting in Lima and observations in and around the project (e.g. park signage, MUF posters, and quality of life posters) were consistent with the description provided in the PDD.
	Conversations with community representatives affirmed claims by CIMA they sought to build local capacity for sustainable land use and improve the quality of life in the buffer zone.

Indicator 3 - Provide a map identifying the project location and boundaries of the project area(s), where the project activities will occur, of the Project Zone and of additional surrounding locations that are predicted to be impacted by project activities (e.g. through leakage).	The audit team used satellite imagery combined with on the ground observations to confirm the project activities map provided by the PDD.
Conformance - Y	
Indicator 4 - Define the project lifetime and GHG accounting period and explain and justify any differences between them. Define an implementation schedule, indicating key dates and milestones in the project's development. Conformance - Y	The definitions of the project lifetime and the GHG accounting period provided in the PDD were determined to be adequate for adhering to the rules and standards of the VCS and the associated methodology; which meet this CCB requirement. Moreover, reviews of management contracts and conversations with government officials by the audit team supported these timelines.

Indicator 5 - Identify likely natural and human- induced risks to the expected climate, community and biodiversity benefits during the project lifetime and outline measures adopted to mitigate these risks. Conformance - Y	The audit team affirmed that the natural and human induced risks presented by the Project Proponent in the VCS AFOLU Non-Permanence Risk Tool, Version 3.1, were an accurate representation of the risks associated with the project. Throughout the field assessments, the audit team was able to confirm that risks from fire, such as fragmentation and the relationship between forest edge and incidence of fire were not an issue in the project area. The other risks and the ways in which they would be mitigated as detailed in the PDD were verified to be appropriate and sufficient through interviews and observations during the site visit.
Indicator 6 - Demonstrate that the project design includes specific measures to ensure the maintenance or enhancement of the high conservation value attributes identified in G1 consistent with the precautionary principle. Conformance - Y	The PDD contains an appropriate description of the measures to ensure the maintenance or enhancement of the high conservation value attributes identified in G1. Given that the very nature of the project activity, as an avoided deforestation project, is consistent with the precautionary principle, the audit team agrees that the measures described in the PDD will be sufficient to ensure the maintenance or enhancement of these high conservation value attributes.

Indicator 7 - Describe the measures that will be taken to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime. Conformance - Y	The PDD provides an adequate description of the measures that will be taken to maintain and enhance the climate, community, and biodiversity benefits beyond the project life time. While not required for validation, the Project Implementation Plan for the first five years of the project was provided to the audit team. Thus far, the project has been both well- designed and implemented maintain the project's benefits beyond the project lifetime.
Indicator 8 - Document and defend how communities and other stakeholders potentially affected by the project activities have been identified and have been involved in project design through effective consultation, particularly with a view to optimizing community and stakeholder benefits, respecting local customs and values and maintaining high conservation values. Project developers must document stakeholder dialogues and indicate if and how the project proposal was revised based on such input. A plan must be developed to continue communication and consultation between project managers and all community groups about the project and its impacts to facilitate adaptive management throughout the life of the project.	The audit team reviewed the PDD, interviewed several Project Proponents and community members about the manner and process for which stakeholders were consulted about the project. The team was provided with evidence from planning meetings involving stakeholders such as documentation of meeting minutes, lists of attendees, and photographs of meeting activities. It was clear that stakeholders were consulted and their input was considered in the design and implementation of the Project. Additionally, continued communication plans carried out by the CIMA technicians and park guards to the communities in the Project Zone were described during the office visit in Lima and corroborated through interviews with community members.
Indicator 9 - Describe what specific steps have been taken, and communications methods used, to publicize the CCBA public comment period to communities and other stakeholders and to facilitate their submission of comments to CCBA. Project Proponents must play an active role in distributing key project documents to affected communities and stakeholders and hold widely publicized information meetings in relevant local or regional languages. Conformance – Y	During onsite activities, which included interviews with representatives from communities in the Project Zone, the audit team was able to confirm that CIMA has held a number of regional community meetings describing the project and its associated activities since the project's initiation in 2008. Due to CIMA's long involvement in the region since 2002, the community has been informed of the project's activities. While CIMA has had constant communication with Project Zone communities, the CCB Public Comment Period was not formally publicized. However, CIMA visited 41 communities to provide overviews of the project, distribute written project descriptions, inform about the location of the PDD and other project documentation at the CIMA offices, and afford participants the opportunity to provide comments about the project design and implementation.

	The audit team reviewed copies of the project descriptions given to the communities as well as the transcripts of their presentations. In addition, copies of comments from affected communities were provided, including responses from CIMA. This evidence was sufficient for the audit team to conclude that the requirements of this indicator had been met.
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Indicator 10 - Formalize a clear process for handling unresolved conflicts and grievances that arise during project planning and implementation. The project design must include a process for hearing, responding to and resolving community and other stakeholder grievances within a reasonable time period. This grievance process must be publicized to communities and other stakeholders and must be managed by a third party or mediator to prevent any conflict of interest. Project management must attempt to resolve all reasonable grievances raised, and provide a written response to grievances within 30 days. Grievances and project responses must be documented.	During the desk review, the audit team reviewed the conflict resolution plan provided in the PDD and the draft monitoring report. During the site visit, the audit team confirmed the presence of grievance logs both in the Lima office as well as in the park guard control posts. Interviews with community representatives, park guards, and project technicians made it transparent to the audit team that the plan was widely communicated throughout the Project Zone and procedures for collecting and disseminating issues were firmly established and in conformance with the requirements of this indicator.
Conformance - Y	

3.2.4. G4 – Management Capacity and Best Practices

The success of a project depends upon the competence of the implementing management team. Projects that include a significant capacity-building (training, skill building, etc.) component are more likely to sustain the positive outcomes generated by the project and have them replicated elsewhere. Best practices for project management include: local stakeholder employment, worker rights, worker safety and a clear process for handling grievances.

G4 - Management Capacity and Best Practices

Indicator 1 -Identify a single Project Proponent which is responsible for the project's design and implementation. If multiple organizations or individuals are involved in the project's development and implementation the governance structure, roles and responsibilities of each of the organizations or individuals involved must also be described.	The audit team was provided with a copy of the management contract giving CIMA full management of the project area. In addition, reviews of the organization structure of CIMA and their implementing partners including all roles and contracts therein were confirmed during the site visit.
Conformance – Y	

Indicator 2 - Document key technical skills that will be required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills. Document the management team's expertise and prior experience implementing land management projects at the scale of this project. If relevant experience is lacking, the proponents must either demonstrate how other organizations will be partnered with to support the project or have a recruitment strategy to fill the gaps.	The key technical skills required for project implementation are appropriately documented within the PDD. The audit team confirmed that the experience of the Project Proponents and other implementing partners (i.e., The Field Museum and TerraCarbon LLC), as documented within the PDD, is sufficient to carry out all necessary technical tasks.
Conformance - Y	

Indicator 3 - Include a plan to provide orientation and training for the project's employees and relevant people from the communities with an objective of building locally useful skills and knowledge to increase local participation in project implementation. These capacity building efforts should target a wide range of people in the communities, including minority and underrepresented groups. Identify how training will be passed on to new workers when there is staff turnover, so that local capacity will not be lost.	The training and orientation plan provided by the PDD is consistent with other documentation reviewed throughout the audit process (e.g., training matrix, CIMA hiring policy, etc.). The audit team was able to observe employees who were previously trained in forest carbon inventories and can attest that the training resulted in a high degree of accuracy. Moreover, interviews with employees from multiple regions of the Project Zone confirmed the employees were highly competent and were representative of communities where they performed their duties.
Conformance - Y	

Indicator 4 - Show that people from the communities will be given an equal opportunity to fill all employment positions (including management) if the job requirements are met. Project Proponents must explain how employees will be selected for positions and where relevant, must indicate how local community members, including women and other potentially underrepresented groups, will be given a fair chance to fill positions for which they can be trained.	The audit team conducted interviews with community representatives to ensure that communities were given an equal opportunity to fill all employment positions. CIMA provided the audit team with copies of job announcements, as well as procedures for selecting employees from applicant pools, confirming adherence to the criteria of this indicator.
Conformance - Y	

Indicator 5 - Submit a list of all relevant laws and regulations covering worker's rights in the host country. Describe how the project will inform workers about their rights. Provide assurance that the	A thorough list of relevant laws and regulation covering worker's rights in Peru was included in the PDD. SCS employed a local expert to review this list as well as investigate the workers' rights regulation with respect to contract labor.
project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved Conformance - Y	In addition, CIMA provided the audit team with a copy of the employee handbook, which includes workers' rights. The results of the audit team's review found the project to be in conformance with all relevant laws and
	regulations.

Indicator 6 - Comprehensively assess situations and occupations that pose a substantial risk to worker safety. A plan must be in place to inform workers of risks and to explain how to minimize such risks. Where worker safety cannot be guaranteed, Project Proponents must show how the risks will be minimized using best work practices.	The audit team was able to confirm that the workers safety plan provided in the PDD was accurate through interviews with employees both in Lima and in the field. For example, the audit team was also able to confirm the first aid kits were adequately stocked with items listed in the safety plan.
Conformance - Y	In addition, park guards were aware of high danger areas (i.e., areas with narco-terrorism) and able to educate the field validation team during the site visit and take safety precautions.

Indicator 7 - Document the financial health of the implementing organization(s) to demonstrate that financial resources budgeted will be adequate to implement the project.	As previously stated in G.3.11, the audit team confirmed that the benchmarks set in the VCS AFOLU Non-Permanence Risk Tool for project funding were appropriately applied to the project financial calculations. The audit team was provided with project cash flow worksheets and was able to verify the accuracy of values therein. Assumptions of revenues were confirmed to be conservative and were derived from reputable sources. Additionally, while in Lima, the audit team was able to view copies of grant funding contracts included in the financial analysis. The result of this review is that the project is in conformance with the requirement of this indicator.

3.2.5. G5 – Legal Status and Property Rights

The project must be based on a solid legal framework (e.g., appropriate contracts are in place) and the project must satisfy applicable planning and regulatory requirements.

During the project design phase, the Project Proponents should communicate early on with relevant local, regional and national authorities in order to allow adequate time to earn necessary approvals. The project design should be sufficiently flexible to accommodate potential modifications that may arise as a result of this process.

In the event of unresolved disputes over tenure or use rights to land or resources in the Project Zone, the project should demonstrate how it will help to bring them to resolution so that there are no unresolved disputes by the start of the project.

G5 - Legal Status and Property Rights

Indicator 1 - Submit a list of all relevant national and local laws and regulations in the host country and all applicable international treaties and agreements. Provide assurance that the project will comply with these and, where relevant, demonstrate how compliance is achieved.	The audit team, in coordination with our local technical expert was able to confirm that the list of laws provided in the PDD was both exhaustive and relevant. Additionally, during interviews with government officials, the audit team reviewed the laws governing national parks and confirmed that the project was in conformance.
Conformance - Y	

Indicator 2 - Document that the project has	The audit team confirmed the validity of the
approval from the appropriate authorities,	management contract between CIMA and SERNANP
including the established formal and/or	during conversations with the government in LIMA.
traditional authorities customarily required by	Moreover, community representatives expressed their
the communities.	support of the project and their want to see CIMA
Conformance - Y	continue to work in the region.

Indicator 3 - Demonstrate with documented consultations and agreements that the project will not encroach uninvited on private property, community property, or government property and has obtained the free, prior, and informed consent of those whose rights will be affected by the project.	Given that the project area is a national park, the project cannot encroach on private property. Government officials conveyed approval of the project to the audit team and expressed the rights of CIMA to operate in the area.
Conformance - Y	In the one area of the park where rumors of un- contacted people existed (Kakataibo), the audit team was able to confirm the creation of an intangible zone, through the consultation of local community members, SERNANP, and relatives of the Kakataibo people, which restricts entry and respects the rights of these people to remain un-contacted.

Indicator 4 - Demonstrate that the project does not require the involuntary relocation of people or of the activities important for the livelihoods and culture of the communities. If any relocation of habitation or activities is undertaken within the terms of an agreement, the Project Proponents must demonstrate that the agreement was made with the free, prior, and informed consent of those concerned and includes provisions for just and fair compensation.	As previously stated, the project area is a national park and is not occupied by private citizens. Prior to the start of the project, CIMA identified a number of land title holders within the new boundaries of the park. The audit team was able to confirm conservation agreements between the landowners and CIMA. During the document review process, the audit team was made aware of a cattle rancher within the borders of the park. CIMA provided the audit team with a land use agreement for the rancher. In all cases, the audit team was able to confirm that these landholdings were
Conformance - Y	removed from the carbon accounting.

Indicator 5 - Identify any illegal activities that	The PDD contains an appropriate description of
could affect the project's climate, community or	potential illegal activities that could affect the project's
biodiversity impacts (e.g., logging) taking place in	climate, community or biodiversity benefits. The audit
the Project Zone and describe how the project	team affirms that, given the circumstances surrounding
will help to reduce these activities so that project	the project, there is little to no likelihood that project
benefits are not derived from illegal activities.	benefits would be derived from illegal activities.
Conformance - Y	

Indicator 6 - Demonstrate that the Project Proponents have clear, uncontested title to the carbon rights, or provide legal documentation demonstrating that the project is undertaken on behalf of the carbon owners with their full consent. Where local or national conditions preclude clear title to the carbon rights at the time of validation against the Standards, the Project Proponents must provide evidence that their ownership of carbon rights is likely to be established before they enter into any transactions concerning the project's carbon assets.	The contract between CIMA and SERNANP includes a provision which gives the carbon rights and profits from other ecosystem services to the holder of the contract, CIMA. This agreement was also confirmed during the interviews with government officials.
Conformance - Y	

3.3. Climate Section

3.3.1. CL1 – Net Positive Climate Impacts

The project must generate net positive impacts on atmospheric concentrations of greenhouse gases (GHGs) over the project lifetime from land use changes within the project boundaries.

CL1 - Net Positive Climate Impacts

Indicator 1 - Estimate the net change in carbon stocks due to the project activities using the methods of calculation, formulae and default values of the IPCC 2006 GL for AFOLU or using a	The estimated net change in carbon stocks due to project activities have been estimated, for the project GHG accounting period, using VCS methodology VM0007. The audit team confirmed that this
more robust and detailed methodology. The net change is equal to carbon stock changes with the project minus carbon stock changes without the project (the latter having been estimated in G2). This estimate must be based on clearly defined and defendable assumptions about how project activities will alter GHG emissions or carbon	methodology is a more robust and detailed methodology than the IPCC 2006 GL for AFOLU, as it provides guidance that is specific to projects that reduce emissions from deforestation and forest degradation. In addition, the methodology is sufficiently rigorous to require clearly defined and
stocks over the duration of the project or the	defendable assumptions about how project activities

project GHG accounting period.	will alter GHG emissions or carbon stocks over the duration of the project GHG accounting period.
	Through a thorough review of relevant spreadsheets, remote sensing imagery and processes and other relevant information, the audit team confirmed the accuracy of the values reported within the PDD as part of the validation audit for the project under the VCS. While several variations (termed "methodology deviations" within the lexicon of the VCS) from the selected methodology were applied, all variations have been appropriately explained within the VCS project description that is referenced by the PDD. Further details regarding the work undertaken to confirm the carbon stock change values reported in the PDD can be found within the VCS validation report for the project. The reader is appropriately directed to the VCS project description for a report of the actual values.
Conformance - Y	
Indicator 2 - Estimate the net change in the emissions of non-CO2 GHG emissions such as CH4 and N2O in the with and without project scenarios if those gases are likely to account for more than a 5% increase or de crease (in terms of CO2-equivalent) of the project's overall GHG emissions reductions or removals over each monitoring period.	As previously stated (G2.3), the audit team found the projects' exclusion of Non-CO2 emissions, such as CH4 and N2O, to be in accordance with VCS methodology VM0007 module E-BB.
Conformance - Y	
Indicator 3 - Estimate any other GHG emissions resulting from project activities. Emissions sources include, but are not limited to, emissions from biomass burning during site preparation, emissions from fossil fuel combustion, direct	The audit team confirmed that the project activities, as described in the PDD, will not include GHG emissions from other sources.

Indicator 4 - Demonstrate that the net climate	A review of carbon calculations by the audit team
impact of the project is positive. The net climate	verified that the net climate impact of the project is
impact of the project is the net change in carbon	positive. The audit team was able to confirm that the
stocks plus net change in non-CO2 GHGs where	calculations were undertaken in conformance with VCS
appropriate minus any other GHG emissions	methodology VM0007. The accuracy of the reported
resulting from project activities minus any likely	methodology milocorr me decuracy of the reported

emissions from the use of synthetic fertilizers, and emissions from the decomposition of N-

fixing species. Conformance Y

project-related unmitigated negative offsite climate impacts (see CL2.3). Conformance Y	values was confirmed through review of remote sensing imagery, relevant spreadsheets, and other processes. Further details regarding the work undertaken to confirm the net climate impact of the project can be found within the VCS validation report for the project.
Indicator 5 - Specify how double counting of GHG emissions reductions or removals will be avoided, particularly for offsets sold on the voluntary market and generated in a country with an emissions cap. Conformance Y	The audit team confirmed the claims in the PDD that double counting will be avoided. This was completed through a thorough internet search and assurances by government officials that no emissions cap exists in Peru.

3.3.2. CL2 – Offsite Climate Impacts ('Leakage')

The Project Proponents must quantify and mitigate increased GHG emissions that occur beyond the project area and are caused by project activities (commonly referred to as 'leakage').

CL2 - Offsite Climate Impacts (Leakage)

Indicator 1 - Determine the types of leakage that are expected and estimate potential offsite increases in GHGs (increases in emissions or decreases in sequestration) due to project activities. Where relevant, define and justify where leakage is most likely to take place.	As referenced within the PDD, a full discussion of the types of leakage that are expected, as well as any leakage emissions, is provided within the VCS project description. The information provided with respect to leakage in the VCS project description is in conformance with the LK-ASU module of the VM0007 methodology and is consistent with the observations
Conformance Y	made by the audit team during on-site audit activities.

Indicator 2 - Document how any leakage will be mitigated and estimate the extent to which such impacts will be reduced by these mitigation activities.	The audit team confirmed that leakage mitigation is accounted for in the project activities. Observations by the audit team during the site visit found that project activities were consistent with claims made in the
Conformance Y	PDD.

Indicator 3 - Subtract any likely project-related unmitigated negative offsite climate impacts from the climate benefits being claimed by the project and demonstrate that this has been included in the evaluation of net climate impact of the project (as calculated in CL1.4).	The quantification of expected leakage emissions were undertaken in accordance with VCS methodology VM0007, and such emissions were duly accounted for in the quantification of the project's expected GHG emission reductions, as reported in the VCS project description. Through a thorough review of relevant spreadsheets, remote sensing imagery and processes and other relevant information, the audit team confirmed the accuracy of the values reported within the VCS project description (including those values
Conformance Y	that are specific to leakage emissions) as part of the validation audit for the project under the VCS.

Indicator 4 - Non-CO2 gases must be included if they are likely to account for more than a 5% increase or decrease (in terms of CO2- equivalent) of the net change calculations (above) of the project's overall off-site GHG emissions reductions or removals over each monitoring period.	As stated previously in this report (G2.3), the audit team found the projects exclusion of Non-CO2 emissions, such as CH4 and N2O, to be in accordance with VCS methodology VM0007 module E-BB.
Conformance Y	

3.3.3. CL3 – Climate Impact Monitoring

Before a project begins, the Project Proponents must have an initial monitoring plan in place to quantify and document changes (within and outside the project boundaries) in project-related carbon pools, project emissions, and non-CO2 GHG emissions if appropriate. The monitoring plan must identify the types of measurements, the sampling method, and the frequency of measurement.

Since developing a full monitoring plan can be costly, it is accepted that some of the plan details may not be fully defined at the design stage, when projects are being validated against the Standards. This is acceptable as long as there is an explicit commitment to develop and implement a monitoring plan.

CL3 - Climate Impact Monitoring

Indicator 1 - Develop an initial plan for selecting The audit team affirms that the project has a fully carbon pools and non-CO2 GHGs to be developed a monitoring plan for selecting carbon monitored, and determine the frequency of pools and non-CO2 GHG's, replete with descriptions of monitoring. Potential pools include aboveground direct measurements and frequencies of data biomass, litter, dead wood, belowground collection. Further information on monitoring is biomass, wood products, soil carbon and peat. located in the VCS validation report. Pools to monitor must include any pools expected to decrease as a result of project activities, including those in the region outside the project boundaries resulting from all types of leakage identified in CL2. A plan must be in place to continue leakage monitoring for at least five years after all activity displacement or other leakage causing activity has taken place. Individual GHG sources may be considered 'insignificant' and do not have to be accounted for if together such omitted decreases in carbon pools and increases in GHG emissions amount to less than 5% of the total CO2-equivalent benefits generated by the project. Non-CO2 gases must be included if they are likely to account for more than 5% (in terms of CO2-equivalent) of the project's overall GHG impact over each monitoring period. Direct field measurements using scientifically robust sampling must be used to measure more significant elements of the project's carbon stocks. Other data must be suitable to the project site and specific forest type. Conformance Y

Indicator 2 - Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.	As stated above, the project has developed a monitoring plan consistent with the criteria of the CCB standards. In addition, the audit team affirms that the current communication plan includes instructions for disseminating the plan to stakeholders and making the plan publicly available.
Conformance Y	

3.4. Community Section

3.4.1. CM1 – Net Positive Community Impacts

The project must generate net positive impacts on the social and economic well-being of communities and ensure that costs and benefits are equitably shared among community members and constituent groups during the project lifetime.

Projects must maintain or enhance the High Conservation Values (identified in **G1**) in the Project Zone that are of particular importance to the communities' well-being.

CM1 - Net Community Impacts

Indicator 1 - Use appropriate methodologies to estimate the impacts on communities, including all constituent socio-economic or cultural groups such as indigenous peoples (defined in G1), resulting from planned project activities. A credible estimate of impacts must include changes in community well-being due to project activities and an evaluation of the impacts by the affected groups. This estimate must be based on clearly defined and defendable assumptions about how project activities will alter social and economic well- being, including potential impacts of changes in natural resources and ecosystem services identified as important by the communities (including water and soil resources), over the duration of the project. The 'with project' scenario must then be compared with the 'without project' scenario of social and economic well-being in the absence of the project (completed in G2). The difference (i.e., the community benefit) must be positive for all community groups.	The audit team affirms that the methodologies for estimating the impacts of the project on communities are consistent with the SBIA part II provided by the CCBA. The audit team reviewed the description of community impacts in the PDD along with other supporting documentation and confirmed that methodologies include criteria for assessing the effect of the project on natural resources and ecosystem services identified as important by communities.
Conformance Y	

Indicator 2 Demonstrate that no High	The DDD provides a description of the projects
mulcator 2 - Demonstrate that no Figh	provides a description of the projects
Conservation Values identified in G1.8.4-642	impacts on High Conservation Values (HCVs), along
will be negatively affected by the project.	with claims that's the project with result in net
	positive impacts for climate, community, and
	biodiversity. The audit team agreed that avoided
	deforestation projects by design maintain and
Conformance Y	enhance HCVs.

3.4.2. CM2 – Offsite Stakeholder Impacts

The Project Proponents must evaluate and mitigate any possible social and economic impacts that could result in the decreased social and economic well-being of the main stakeholders living outside the Project Zone resulting from project activities. Project activities should at least 'do no harm' to the well-being of offsite stakeholders.

CM2 - Offsite Stakeholder Impacts

Indicator 1 - Identify any potential negative	The PDD claims that the project is not expected to
offsite stakeholder impacts that the project	have an effect on offsite stakeholders. Interviews with
activities are likely to cause.	communities during on-site activities and results from
	the Mapeo de Usos y Fortalezas (MUF) confirmed that
	immigration has not decreased as a result of the
	project and that there are no negative offsite
Conformance Y	stakeholder impacts due to the project.

Indicator 2 - Describe how the project plans to mitigate these negative offsite social and economic impacts.	Given that no negative impacts to offsite stakeholders are expected, the project does not have a plan for mitigation.
Conformance Y	

3.4.3. CM3 – Community Impact Monitoring

The Project Proponents must have an initial monitoring plan to quantify and document changes in social and economic well-being resulting from the project activities (for communities and other stakeholders). The monitoring plan must indicate which communities and other stakeholders will be monitored, and identify the types of measurements, the sampling method, and the frequency of measurement.

Since developing a full community monitoring plan can be costly, it is accepted that some of the plan details may not be fully defined at the design stage, when projects are being validated against the Standards. This is acceptable as long as there is an explicit commitment to develop and implement a monitoring plan.

CM3 - Community Impact Monitoring

Indicator 1 - Develop an initial plan for selecting community variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project's community development objectives and to anticipated impacts (positive and negative).	As reported in the PDD, an initial plan was established for selecting variables to be monitored, along with the frequency of monitoring and reporting. The audit team was provided with documentation of the full monitoring plan that contains a greater level of specificity regarding the monitoring that will take place with respect to the community development objectives within the Project Zone. The audit team agrees that the basic framework for monitoring was appropriately developed in the PDD, as it is in
Conformance Y	accordance with the CCB Standards.

Indicator 2 - Develop an initial plan for how they The	ne audit team reviewed documentation of the MUF
will assess the effectiveness of measures used to maintain or enhance High Conservation Values related to community well-being (G1.8.4-6) present in the Project Zone. Conformance V	rocess and the Index of Conservation Compatibility to ssess the effectiveness of measures used to maintain and enhance High Conservation Values related to community wellbeing present in the Project Zone. The udit team verified that the plan included well ocumented, robust methods for the assessment of CVs.
Conformance Y	

Indicator 3 - Commit to developing a full	The audit team reviewed the initial design of the
monitoring plan within six months of the project	monitoring plan for assessing the impact of the project
start date or within twelve months of validation	of community wellbeing and it was verified that the
against the Standards and to disseminate this	plan included appropriate variables and temporal
plan and the results of monitoring, ensuring that	guidelines for implementation. The plan is appropriate
they are made publicly available on the internet	for disseminating the documentation, making it
and are communicated to the communities and	publicly available, and communicating the plan to
other stakeholders.	communities and other stakeholders.
Conformance Y	

3.5. Biodiversity Section

3.5.1. B1 – Net Positive Biodiversity Impacts

The project must generate net positive impacts on biodiversity within the Project Zone and within the project lifetime, measured against the baseline conditions.

The project should maintain or enhance any High Conservation Values (identified in **G1**) present in the Project Zone that are of importance in conserving globally, regionally or nationally significant biodiversity.

Invasive species populations must not increase as a result of the project, either through direct use or indirectly as a result of project activities.

Projects may not use genetically modified organisms (GMOs) to generate GHG emissions reductions or removals. GMOs raise unresolved ethical, scientific and socio-economic issues. For example, some GMO attributes may result in invasive genes or species.

B1 - Net Positive biodiversity Impacts

Indicator 1 -Use appropriate methodologies to estimate changes in biodiversity as a result of the project in the Project Zone and in the project lifetime. This estimate must be based on clearly defined and defendable assumptions. The 'with project' scenario should then be compared with the baseline 'without project' biodiversity scenario completed in G2. The difference (i.e., the net biodiversity benefit) must be positive.	Interviews with Project Proponents, as well as community members, enabled the audit team to confirm that the methodology employed in the project design, Index of Conservation Compatibility (ICC) is an effective tool for estimating changes in biodiversity The ICC is based on methodologies provided by the CCBA and clearly accounts for changes between the "with project" and "without project" scenarios. The objectives of the project—park protection and the resulting avoided deforestation—as designed in the PDD are likely to result in net positive biodiversity benefits.

Indicator 2 -Demonstrate that no High Conservation Values identified in G1.8.1-348 will be negatively affected by the project.	As previously stated in this report (CM1.2), The PDD provides a description of the projects impacts on High Conservation Values (HCVs), along with claims that the project will result in net positive impacts for climate, community, and biodiversity. The audit team verified that this avoided deforestation project will design
Conformance Y	maintain and enhance HCVs.

Indicator 3 - Identify all species to be used by the project and show that no known invasive species will be introduced into any area affected by the project and that the population of any invasive species will not increase as a result of the project.	The audit team reviewed the documentation referenced in the PDD (RBI 2001) and verified through interviews that no species will be used by the project. In addition observations made during the site visit confirmed that no invasive species will be introduced and that invasive species are not expected to increase
Conformance Y	as a result of project activities.

Indicator 4 - Describe possible adverse effects of non-native species used by the project on the region's environment, including impacts on native species and disease introduction or facilitation. Project Proponents must justify any use of non-native species over native species.	As stated above, no non-native or invasive species will be used in the project and thus this indicator is not applicable to the project.
Conformance Y	

Indicator 5 - Guarantee that no GMOs will be used to generate GHG emissions reductions or removals.	The audit team verified the claims in the PDD that no GMOs will be used to generate GHG emissions reductions or removals. Observations made during the site visit were supported these claims.
Conformance Y	

3.5.2. B2 – Offsite Biodiversity Impacts

The Project Proponents must evaluate and mitigate likely negative impacts on biodiversity outside the Project Zone resulting from project activities.

B2 - Offsite Biodiversity Impacts

Indicator 1 - Identify potential negative offsite	It is the understanding of the audit team that intact
biodiversity impacts that the project is likely to	forests result in maintaining, if not enhanced
cause.	biodiversity and thus no resulting negative impacts are
	expected from project activities. Additionally, the
Conformance Y	Project Proponent provided documentation of
	instances of increased populations of certain species
	in the buffer zone as a result of activities implemented
	in the design phase of the project. The PDD claims that
	there will be no negative offsite biodiversity impact

Indicator 2 - Document how the project plans to mitigate these negative offsite biodiversity impacts.	The PDD asserted that since the project is an avoided deforestation project, no negative biodiversity impacts are expected and thus no mitigation plan is necessary. The audit team verified that this claim is appropriate for this project.
Conformance Y	for this project.

Indicator 3 - Evaluate likely unmitigated negative offsite biodiversity impacts against the biodiversity benefits of the project within the project boundaries. Justify and demonstrate that the net effect of the project on biodiversity is positive.	The PDD provides exhaustive information on the expected impacts of the project on biodiversity within the project boundaries. This information was consistent with the professional knowledge of the audit team.
Conformance Y	

3.5.3. B3 – Biodiversity Impact Monitoring

The Project Proponents must have an initial monitoring plan to quantify and document the changes in biodiversity resulting from the project activities (within and outside the project boundaries). The monitoring plan must identify the types of measurements, the sampling method, and the frequency of measurement.

Since developing a full biodiversity-monitoring plan can be costly, it is accepted that some of the plan details may not be fully defined at the design stage, when projects are being validated against the Standards. This is acceptable as long as there is an explicit commitment to develop and implement a monitoring plan.

B3 - Biodiversity Impact Monitoring

Indicator 1 - Develop an initial plan for selecting biodiversity variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project's biodiversity objectives and to anticipated impacts (positive and negative).	The audit team reviewed the monitoring plan that will be implemented and verified that the plan includes justification for the selected variables, as well as the temporal guidelines for implementation.
Conformance Y	

Indicator 2 - Develop an initial plan for assessing the effectiveness of measures used to maintain or enhance High Conservation Values related to globally, regionally or nationally significant biodiversity (G1.8.1-3) present in the Project Zone.	The Project Proponent provided the audit team with documentation of the Index of Conservation Compatibility used to assess the effectiveness of measures used to maintain or enhance High Conservation Values. The audit team agrees that the use of forest cover, park patrols, and observations by
Conformance Y	community representatives are appropriate tools for assessing the effect of the project activities on biodiversity in the Project Zone.

Indicator 3 - Commit to developing a full	As previously stated (B3.1) the Project Proponent
monitoring plan within six months of the project	provided the audit team with documentation of the
start date or within twelve months of validation	monitoring plan for assessing the impacts of the
against the Standards and to disseminate this	project activities on biodiversity in the Project Zone.
plan and the results of monitoring, ensuring that	The plan is appropriate for disseminating the
they are made publicly available on the internet	documentation, making it publicly available, and
and are communicated to the communities and	communicating the plan to communities and other
other stakeholders.	stakeholders.
Conformance Y	

3.6. Gold Level Section

3.6.1. GL1 – Climate Change Adaptation Benefits

This Gold Level Climate Change Adaptation Benefits criterion identifies projects that will provide significant support to assist communities and/or biodiversity in adapting to the impacts of climate change. Anticipated local climate change and climate variability within the Project Zone could potentially affect communities and biodiversity during the life of the project and beyond. Communities and biodiversity in some areas of the world will be more vulnerable to the negative impacts of these changes

due to: vulnerability of key crops or production systems to climatic changes; lack of diversity of livelihood resources and inadequate resources, institutions and capacity to develop new livelihood strategies; and high levels of threat to species survival from habitat fragmentation. Land-based carbon projects have the potential to help local communities and biodiversity adapt to climate change by: diversifying revenues and livelihood strategies; maintaining valuable ecosystem services such as hydrological regulation, pollination, pest control and soil fertility; and increasing habitat connectivity across a range of habitat and climate types.

GL1 - Climate Change Adaptation Benefits

Indicator 1 -Identify likely regional climate change and climate variability scenarios and impacts, using available studies, and identify potential changes in the local land-use scenario due to these climate change scenarios in the absence of the project.	NA
Conformance NA	

Indicator 2 - Identify any risks to the project's climate, community and biodiversity benefits resulting from likely climate change and climate variability impacts and explain how these risks will be mitigated.	NA
Conformance NA	

Indicator 3 - Demonstrate that current or anticipated climate changes are having or are likely to have an impact on the well-being of communities51 and/or the conservation status of biodiversity52 in the Project Zone and surrounding regions.	NA
Conformance NA	

Indicator 4 - Demonstrate that the project	NA
activities will assist communities and/or	
biodiversity to adapt to the probable impacts of	

climate change.	
Conformance (Y/N/NA)	

3.6.2. GL2 – Exceptional Community Benefits

This Gold Level Exceptional Community Benefits criterion recognizes project approaches that are explicitly pro-poor in terms of targeting benefits to globally poorer communities **and** the poorer, more vulnerable households and individuals within them. In so doing, land-based carbon projects can make a significant contribution to reducing the poverty and enhancing the sustainable livelihoods of these groups. Given that poorer people typically have less access to land and other natural assets, this optional criterion requires innovative approaches that enable poorer households to participate effectively in land-based carbon activities. Furthermore, this criterion requires that the project will 'do no harm' to poorer and more vulnerable members of the communities, by establishing that no member of a poorer or more vulnerable social group will experience a net negative impact on their well-being or rights.

GL2 - Exceptional Community Benefits

Indicator 1 - Demonstrate that the Project Zone	NA
is in a low human development country OR in an	
administrative area of a medium or high human	
development55 country in which at least 50% of	
the population of that area is below the national	
poverty line.	
Conformance NA	

Indicator 2 - Demonstrate that at least 50% of households within the lowest category of wellbeing (e.g., poorest quartile) of the community are likely to benefit substantially from the project.	NA
Conformance NA	

Indicator 3 - Demonstrate that any barriers or	NA
risks that might prevent benefits going to poorer	
households have been identified and addressed	
in order to increase the probable flow of	
benefits to poorer households.	

Conformance NA	

Indicator 4 - Demonstrate that measures have	NA
been taken to identify any poorer and more	
vulnerable households and individuals whose	
well-being or poverty may be negatively affected	
by the project, and that the project design	
includes measures to avoid any such impacts.	
Where negative impacts are unavoidable,	
demonstrate that they will be effectively	
mitigated.	
Conformance NA	

Indicator 5 - Demonstrate that community impact monitoring will be able to identify positive and negative impacts on poorer and more vulnerable groups. The social impact monitoring must take a differentiated approach that can identify positive and negative impacts on poorer households and individuals and other disadvantaged groups, including women.	NA
Conformance NA	

3.6.3. GL3 – Exceptional Biodiversity Benefits

All projects conforming to the Standards must demonstrate net positive impacts on biodiversity within their Project Zone. This Gold Level Exceptional Biodiversity Benefits criterion identifies projects that conserve biodiversity at sites of global significance for biodiversity conservation. Sites meeting this optional criterion must be based on the Key Biodiversity Area (KBA) framework of vulnerability and irreplaceability. These criteria are defined in terms of species and population threat levels, since these are the most clearly defined elements of biodiversity. These scientifically based criteria are drawn from existing best practices that have been used, to date, to identify important sites for biodiversity in over 173 countries.

Project Proponents must demonstrate that the Project Zone includes a site of high biodiversity conservation priority by meeting either the vulnerability *or* irreplaceability criteria defined below:

GL3 - Exceptional Biodiversity Benefits

Indicator 1 - Vulnerability - Regular occurrenceSeeof a globally threatened species (according to the IUCN Red List) at the site:	e Below
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Indicator 1.1 - Critically Endangered (CR) and T Endangered (EN) species - presence of at least a single individual; or P Indicator 1.1 - Critically Endangered (CR) and T Conformance Y C It C It C	The audit team reviewed the list of critically endangered and endangered species provided in Appendix 2 of the PDD and the Rapid Biological Inventory performed by Alverson et. al. (2001) and compared them to the species listed on the IUCN Red List. The team verified that the project meets the criteria of this gold-level indicator. During the site visit, the audit team also received further confirmation of this information during interviews with park guards in the Project Zone.
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Indicator 1.2 - Vulnerable species (VU) - presence of at least 30 individuals or 10 pairs.	NA
Conformance NA	

4.0 CCB Validation Conclusion

Following completion of SCS' duly-accredited validation process, it is our opinion that the Cordillera Azul National Park Project conforms to the CCBA Climate, Community and Biodiversity Project Design Standards (Second Edition) at the Gold Level (see Appendix A).

5.0 Corrective Action Requests

Please see section 3.1 of this report for descriptions of the types of corrective action requests. Please see section 3 for references to these corrective action requests.

NIR 2012.1 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G1.5

Document Reference: PDD Section 1.10

Finding: While the PDD contains a general description of the communities in the Project Zone, it is not sufficient to adequately understand and evaluate the likely impacts of the project and the manner in which communities are engaged. Please provide a more detailed description of the communities in the Project Zone which describes the social, economic and cultural diversity within these communities, including any community characteristics, as defined by the CCB.

Client Response: Additional detail and a summary table have been added to PDD Section 1.10.2. Additional detail regarding hunting and fishing by the communities was added to PDD Section 1.10.4.

Auditor Response: The project proponent amended sections 1.10.2 and 1.10.4 of the PDD to include a more detailed description of the communities in the project zone. The amendments included demographic information on language, economics, population, gender distribution, education, daily life, and the reliance of the communities on the park resources. Thus sufficiently closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.2 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G1.5

Document Reference: PIR G 1.5

Finding: The PDD states the "strict protection zone" or "Zona de Proteccion Estricta" was established to "respect the desire of these people to remain uncontacted" and "permit zero entry of outsiders." Please provide evidence to support this claim. The information about this zone in the Ley de Areas Naturales Protegidas (Ley No. 26834) does not specifically mention human communities.

Client Response: Additional information about this process was added to the PDD Section 1.10.1.1 to add transparency. Additional evidence was provided during interviews with CIMA and TFM personnel during the site visit and in the 2011-2016 Plan Maestro. Protected area legislation does not indicate rationales behind designated uses or mention human communities. The Plan Maestro developed once CIMA had the management contract includes the justifications and reasons behind the areas to ensure that information is publicly and transparently captured.

Auditor Response: The project proponent amended section 1.10.1 of the PDD to include excerpts from Peruvian legislation governing the rights of "un-contacted peoples." In addition, amendments to the PDD explain how the project activities do not infringe on the rights of these people. This additional information is sufficient to close this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.3 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G1.6

Document Reference: PDD 1.10.4

Finding: Please provide a copy of the agreement between the cattle rancher and CIMA and SERNANP.

Client Response: These have been provided in the evidence emailed via YouSendIt on November 30.

Auditor Response: The project proponent provided copies of both the agreement between the cattle rancher and INRENA (later SERNANP) and the cattle rancher and the Ministry of agriculture regarding the rules and agreements for the cattle rancher using the park for his livestock operation, thus allowing for the closure of this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.4 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G1.6

Document Reference: PDD 1.10.4, PDD 1.10.2.1

Finding: The CCB Standard requires the PDD to "[identify] any ongoing or unresolved conflicts or disputes and

[identify] and [describe] any disputes over land tenure that were resolved during the last ten

years. The PDD states that the majority of the people in the buffer zone do not legally own their own land. Please indicate the implications of this status and how it can impact the project area. Please also explain how illegal logging was removed from the park by CIMA and local park guards.

Client Response: Additional information regarding land tenure implications was added to PDD Sections 1.8.1, 1.10.4, and 1.13.4. A summary of the removal of illegal logging is provided in PD Section 1.8.1.

Auditor Response: The project proponent provided copies of MOU's between landowners and CIMA regarding conservation of the park. In addition the PDD was amended to include a description of land tenure in the project zone and how this affects the implementation of the project activities. Section 1.8.1 of the PDD provides a timeline for the removal illegal logging from the park along with how this will continue throughout the life of the project. These amendments are sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.5 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G1.8.1, c

Document Reference: PDD 1.10.5, 1.10.6, 1.10.7, and Appendix II

Finding: Please provide the level of endemicity for species in the Project Zone.

Client Response: Additional information was included in PDD Section 1.10.6.

Auditor Response: The project proponent expanded PDD to include levels of endemism for species deemed endemic in the project zone, thus providing sufficient evidence for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.6 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G1.8.5

Document Reference:

Finding: Please provide information about "Areas that are fundamental for meeting the basic needs of local communities (e.g., for essential food, fuel, fodder, medicines or building materials without readily available alternatives)" in the Project Zone.

Client Response: Additional information and a map were added to PDD Section 1.10.4.

Auditor Response: The project proponent amended section 1.10.4 of the PDD to include a map with the location of "Areas that are fundamental for meeting the basic needs of local communities (e.g., for essential food, fuel, fodder, medicines or building materials without readily available alternatives)" in the Project Zone. The addition of the map along with a more detailed description of the basic needs of communities is sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.7 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G1.8.6

Document Reference:

Finding: Please provide information about "Areas that are critical for the traditional cultural identity of communities (e.g., areas of cultural, ecological, economic or religious significance identified in collaboration with the communities)" in the Project Zone.

Client Response: Additional information was added to PDD Section 1.13.5.1

Auditor Response: The project proponent amended the PDD to include a detailed description of "Areas that are critical for the traditional cultural identity of communities (e.g., areas of cultural, ecological, economic or religious significance identified in collaboration with the communities)" in the Project Zone. In addition, a map showing these areas in relation to the project zone was also included. While it would be easier to understand the new map if these areas were included in the map legend, these amendments are sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.8 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G2.2

Document Reference:

Finding: Please explain how existing laws and regulations would likely affect land use and justify that the project benefits are truly additional.

Client Response: Additional information is provided in PDD Section 1.11 and Section 1.11.2.

Auditor Response: The project proponent expanded sections 1.11 and 1.11.2 of the PDD to include a list of all laws affecting the project zone. In addition, conversations during the site visit with the CIMA and the Peruvian government sufficiently explained the inability of local and regional governments to effectively enforce these laws. This evidence is sufficient for proving the additionality of the project and

closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.9 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G.2.3, PP 14

Document Reference: PDD 2.3.1

Finding: Please provide evidence that the non-CO2 GHG emissions in the baseline are "negligible" (\geq 5% of the overall GHG impact over each monitoring period) and need not be included in the baseline.

Client Response: Additional information was included in Section 2.3.1.

Auditor Response: Section 2.3.1 of the PDD has been updated to include evidence that non-CO2 gasses are negligible (<5%) of the total GHG impact for each monitoring period. The changes to the PDD are sufficient for the closing of this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.10 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G3.2. G 3.3, G3.4

Document Reference:

Finding: Describe each project activity with expected climate, community and biodiversity impacts and its relevance to achieving the project's objectives. Please also include the temporal (implementation schedule and milestones in the project's development) and spatial information (map) associated with these activities.

Client Response: Additional information has been included in PDD Section 1.8.1. Information was also presented during interviews via telephone and the site visit.

Auditor Response: Section 1.8.1 of the PDD has been expanded to include a description of each project activity along with the expected impacts on climate, communities, and biodiversity. In addition to these descriptions, the project proponent added a table of "Major Project Milestones" to this section.

The changes to the documentation, while additional, are not sufficient for closing this finding. Major project activities such as the quality of life assessments are not included in the list of activities. Please expand the project activities in the PDD to include "all" project activities. Moreover, while implementation is not a requirement of validation, "an implementation schedule, including key dates and milestones in the projects development" is required. Please amend the PDD to include a description of when and where these activities will be implemented (i.e. when the environmental educational guides will be published and disseminated). Finally, please correct the table of major project milestones to account for the temporal implementation of project activities and also for the change in scope to validation only.

Client Response 2: All major project activities planned at the beginning of the project are included in the PDD. Many new activities were identified following the community meetings held in 2008 and 2009 to solicit input in long term project design or as a result of natural project evolution over time. These activities are outlined in the Climate Change Monitoring Report and will be discussed in the PIR.

The list of project activities in PDD Section 1.8.1 has been converted to a table which includes columns identifying the activity location and whether the activity was planned for 2008 or 2009. An additional sentence has been added to more transparently indicate that activity planning beyond 2009 was dependent on the input received from the community meetings and the long term visions developed.

The major project milestone table has not been revised. The temporal implementation of project activities has been added in the earlier table. In 2008, the project's plan was to conduct validation and verification at the same time for CCB. The change in scope will be addressed in the PIR.

Auditor Response 2: The information provided by the project proponent clearly defines the initial project activities, including spatial and temporal implementation. While this information is helpful in providing a better understanding of the initial project activities, it is unclear to SCS whether or not these activities will continue beyond the years listed in the table (2008 and 2009).

Please amend this section of the PDD to clarify that these activities will continue throughout the life of the project.

Client Response 3: Additional text has been added to clarify that the activities will continue although they may change in scope or location in response to changing conditions.

Auditor Response 3: The additional text added to the PDD has sufficiently clarified the temporal scope of the project activities. SCS is in agreement that these additions are adequate for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.11 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G3.5

Document Reference: PDD 1.13.4

Finding: The PDD cites the VCS' AFOLU Non-Permanence Risk Tool to meet the requirements of CCB indicator G 3.5. During the site visit, it was determined that there are other risks to the project including oil, gas and logging concessions. Please include all likely risks to the projects in the PDD and the measures to mitigate these risks.

Client Response: Additional details were added in PDD Section 1.13.4.

Auditor Response: Section 1.13.4 of the PDD was amended to include evidence of all risks to the project zone. In addition the project proponent included a mitigation strategy for the additional risks. These amendments are sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.12 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G3.8

Document Reference: PDD 7.1

Finding: The PDD describes interaction with communities in the Project Zone through the MUFs, communication with the CIMA extension team and Park Guards. Please describe how the following CCB requirement is met: "Project developers must document stakeholder dialogues and indicate if and how the project proposal was revised based on such input."

During our community interviews we were made aware of claims made to park guards with respect to illegal park uses and were not forwarded to CIMA. Please show how the current system for handling conflicts is able to address such instances.

Client Response: Additional information was included in Section 7.1.3.

Auditor Response: The project proponent amended section 7.1.3 of the PDD to include a detailed description of the process for addressing breakdowns in the ability of park guards to handle community concerns in the field. This explanation is sufficient for providing a written record of how these issues are resolved, as well as providing feedback to the community. These additions to the PDD are sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.13 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G3.9

Document Reference: PDD 7.1

Finding: Please demonstrate how the Cordillera Azul National Park REDD Project has met the requirements of CCB indicator G3.9.

"Describe what specific steps have been taken, and communications methods used, to publicize the CCBA public comment period to communities and other stakeholders and to facilitate their submission of comments to CCBA. Project proponents must play an active role in distributing key project documents to affected communities and stakeholders and hold widely publicized information meetings in relevant local or regional languages."

Client Response: Additional information was included in Section 7.1.2.

Auditor Response: The project proponent has amended the PDD to include a detailed plan of how information and documentation will be disseminated. Along with the addition to the PDD, the project proponent has also provided a detailed communication plan timeline in Appendix 10. However, in order to close this finding:

Given that ALL of the communities have not been visited and that this will be an ongoing process, it is imperative that SCS understand the approach and its applicability to the various communities in the Project Zone. In order to address the risks associated with this approach to satisfying indicator G3.9:

Please provide copies of the posters that will be distributed to the communities, along with a detailed description of the information that will be provided in the presentation of this material. Also, please explain how CIMA will solicit feedback and convey the need for the communities to be included in the project design. In addition, please provide an explanation of how the project proponent will facilitate public comments to the CCBA.

Client Response 2: As described in the PDD, CIMA will use both posters and presentations to disseminate information regarding the project. Copies of the PDD, PIR and Monitoring reports in Spanish will also be available in the CIMA offices in hard copy for those who do not have access to internet.

The poster has been provided. The poster will be modified for different regions to include the relevant CIMA office and CG contact person for that area. An outline of the presentation has also been provided. Prior to going to each community, this outline will be fleshed out with additional details specific to the community or region. These details include contact information, CIMA's activities both in the past and future, and other similar types of information. This will allow the presentation to be more relevant and accessible to each community. Copies of the presentation will be left in each community along with the poster for the community's future reference.

CIMA initially conveyed the need for community input into the project design and solicited feedback during the regional community meetings held in 2008 and 2009. This resulted in the development of community-led regional visions which guide the overall process and the identification of specific project activities. This process and its results were captured in the 2011-2016 Plan Maestro and its companion document. CIMA will ensure that the process will be repeated and documented again every five years when the Plan Maestro must be revised.

Since 2009 CIMA solicits input and feedback during each meeting it has with communities. Each visit allows CIMA the opportunity to stress that community involvement is vital to the avoidance of deforestation in the park. Regular input from communities is obtained through this path and reported via the technicians and park guards. This input is incorporated in the ICC and in CIMA's annual operating plan. Where appropriate, an action plan for evaluating the suggestion and implementing change is developed and signed by the community and CIMA to document the suggestion and the agreed upon time-table for resolution. Regional meetings are held periodically to ensure that all communities, whether identified as a critical, high-priority community or not, are able to provide thoughts and opinions that help shape the project's activities.

CIMA will solicit comments to CCBA through several paths as described in the PD. Comments will be solicited and gathered during the community project summary meetings and any subsequent town meetings. CIMA will document the comments and enter them into the CCBA website on behalf of the submitter, retaining records to demonstrate faithful submission of the comments. In addition, CIMA will

inform communities that an auditor will be available if anyone feels more comfortable submitting a comment through the auditor.

Auditor Response 2: The project proponent provided SCS with a copy of the informational posters to be provided to the communities along with an outline of the information that will be presented. While this documentation is necessary for satisfying the requirement of the standard, this information alone is not sufficient to close this finding.

Given that SCS is charged with using professional judgment with respect to adherence to CCB Standards Second Edition Section G3.9 and that this plan is in lieu of the CCBA public comment period, it is imperative that SCS have a reasonable level of assurance that any comments solicited throughout this process are addressed and included in the final version of the PDD. It is difficult to assess the implementation timeline for this process without information about the spatial and temporal components of the community meetings. Please provide this information so we can assess the fulfillment of this requirement.

Client Response 3: We believe that there is confusion regarding the validation comment period and the verification comment period likely caused by our trying to have the PD reflect what the plan in 2008 was and not reflecting the current two-step process of completing validation and then verification.

We have added text to the PD to more specifically differentiate between the validation and verification comment periods.

To provide an overview however: the posters and presentation outline provided to SCS will be implemented as soon as the sale of carbon credits takes place and the financing is available to implement the communication plan in Appendix 10 and discussed in the PD. We anticipate this to be used to present the project status and for soliciting comments for the verification comment period.

CIMA has continuously solicited community input for the project design throughout the project and even prior to its start. Input gathered pre-project has been included in the PD. In order to meet the requirements for the validation comment period however, CIMA has ensured copies of all key project documents (PD and Monitoring Reports) are translated and located in each regional CIMA office and available to those who wish to read them. Translated documents have been available for several weeks. Starting January 2, CIMA will send letters and technicians to every community in the buffer zone to ensure that all communities have received direct notification of the location of the documents and are aware that CIMA welcomes feedback. No comments have been received to date. If any comments are received following the notification in January, they will be immediately addressed in writing. If appropriate, the PDD will be revised. CIMA will provide copies of the comments along with the responses to SCS as any comments are received.

Auditor Response 3: The project proponent has provided a list of communities that have, to date, been informed of the location and availability of the "key project documents". In addition the posters and descriptions of informational sessions that will be provided to affected communities are in accordance

with what is expected to satisfy the criteria of indicator G3.9.

While SCS is in agreement that this is an appropriate plan for communicating the project design and soliciting feedback; that we cannot, in good faith sign off on the closing of this finding until all potential comments have been considered. SCS will revisit this finding upon completion of the proposed communications plan.

Closing Remarks: Upon completion of the public comment period, the audit team was supplied with sufficient evidence that communities and other stakeholders were given access to the project documentation. Documentation of the public comments, as well as client responses was also provided for assessment by the audit team. The Client's response adequately addresses the finding.

NIR 2012.14 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G3.10

Document Reference: PDD 7.2

Finding: The PDD states that unresolved issues can be taken to the Comite de Gestion, includes representation from all stakeholders involved in the management of the park including communities, local and regional governments, local organizations, the Park Head and CIMA.

During our interviews with the communities we found there were tensions between communities with respect to conservation efforts. In addition, there were issues between communities being helped by CIMA and communities who are not currently included in CIMA's outreach efforts. This issue, to this point has not been documented or addressed by CIMA. Please provide a description on how issues such as this will be discovered and addressed.

Please explain how this process for hearing and responding to grievances has been publicized to communities as well as how it is managed by a third party, and resolved with a written response within 30 days.

During our community interviews we found multiple occurrences where communities were unclear on how to voice grievances. We believe this could be a growing issue moving forward and could lead to non-conformance in the future.

Client Response: Additional information regarding the grievance process has been added to PDD Section 7.1.3.

Additional information regarding the communication of the grievance process has been added to PDD Section 7.1.2.

Information regarding the potential for tensions between communities has been added to PDD Section 1.13.4.

Auditor Response: The project proponent has amended the PDD to include a better description of the process for dealing with grievances. While this is sufficient for closing this finding, this will be important to revisit during verification.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.15 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G3.11

Document Reference: PDD 2.5

Finding: Please provide a source for the inputs used in the financial revenue projections of carbon credits to be sold by the project. In addition, please demonstrate that there is sufficient interest in these credits to provide an adequate flow of funds for project implementation.

Client Response: The sources for the inputs were delivered via You Send It on October 30. Information regarding potential buyers and demonstrated interest was provided during the site visit interviews in Lima.

Auditor Response: The project proponent has provided evidence for the sources of financial revenue from the sale of VCU'S and has also provided evidence showing these values are conservative. In addition, during the site visit, the project proponent provided evidence of buyers interested in project credits. This information is sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.16 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G4.3

Document Reference: PDD 7

Finding: Please provide the employee training plan mentioned during the site visit.

Client Response: Additional information regarding the training program was added to the PDD in Section 1.3.2. The training matrix is included in the evidence sent on November 30.

Auditor Response: The project proponent has updated the PDD to include a detailed description of the plan for training and orientation. In addition, a copy of the current training matrix has been added to the project folder. This information is sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.17 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G4.4

Document Reference: PDD 1.3.2

Finding: Please provide evidence that CIMA's hiring practices include provisions to meet the requirements of CCB indicator G4.4.

"The success of a project depends on the competence of the implementing management team. Projects that include a significant capacity-building (training, skill building, etc.) component are more likely to sustain the positive outcomes generated by the project and have them replicated elsewhere. 4. Show that people from the community will be given an equal opportunity to fill all employment positions (including management) if the job requirements are met. Project proponents must explain how employees will be selected for positions and where relevant, must indicate how local community members, including women and other potentially underrepresented groups, will be given a fair chance to fill positions for which they can be trained."

Community members provided comments to the audit team that the hiring practices were not well known or fair.

Client Response: Additional information regarding the hiring process was added to the PDD in Section 1.3.2 to increase transparency regarding the communication of positions and the hiring process. Evidence of hiring decisions, job postings and the CIMA hiring policy were provided in the evidence sent on October 30.

Auditor Response: The project proponent has amended the PDD to include a more detailed description of the hiring process. In addition the client provided SCS with copies of CIMA's hiring procedures, job postings, and how women and other underrepresented groups are included in the process. This new information is sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.18 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G.4.5

Document Reference:

Finding: Please submit a list of all relevant laws and regulations covering worker's rights in Peru.

Please include an explanation of workers' rights with respect to communal park guards.

Client Response: Additional details were added to PDD Section 1.11.1.

Auditor Response: The project proponent has amended the PDD to include additional details of the current workers' rights laws. In addition, our technical expert has investigated the role of these laws with respect to contract labor and found CIMA to be in conformance of these laws. This information is sufficient for the closing of this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.19 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G.4.6

Document Reference:

Finding: Please provide a worker safety plan that is in conformance with the requirements of CCB indicator G4.6.

"Comprehensively assess situations and occupations that pose a substantial risk to worker safety. A plan must be in place to inform workers of risks and to explain how to minimize such risks. Where worker safety cannot be guaranteed, project proponents must show how the risks will be minimized using best work practices."

During our field verification we heard comments from community members with respect to worker safety. These comments stated that the proper equipment was not provided to communal park guards when working in remote locations and that their health and safety were at risk.

Client Response: The worker safety plan and CIMA's Security Protocols were further defined in the PDD in Section 1.3.2. The Security Protocols are provided in the evidence sent on November 30. Communal park guards use the same equipment, safety plan and Security Protocols as all CIMA employees and Park Guards.

Auditor Response: The project proponent amended the PDD to include details on worker safety and security orientation. In addition, SCS also received copies of worker security and first aid policies on 11/30/2012. This information is sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.20 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G 5.1

Document Reference:

Finding: Please submit a list of all relevant national and local laws and regulations in Peru and all applicable international treaties and agreements and provide assurance that the project will comply with them.

Client Response: Additional details have been added to PDD Section 1.11.

Auditor Response: The project proponent amended the PDD to include an updated list of laws relevant to the project zone. This list also includes the relevance to the project and compliance where necessary. This information is sufficient for the closing of this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.21 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G 5.3

Document Reference: PDD 1.10.1.1

Finding: Please state how the project proponents are assured that the project would be in conformance with the CCB indicator G5.3:

"Demonstrate with documented consultations and agreements that the project will not encroach uninvited on private property, community property, or government property and has obtained the free, prior, and informed consent of those whose rights will be affected by the project."

Please provide more information in the PDD about how the Kakataibo group has been considered in the project design and implementation, as discussed during the site visit and phone calls.

Client Response: Additional details added to PDD Section 1.10.4 and Section 1.12.1 to address this.

Auditor Response: The project proponent has provided proof that there are no current unresolved claims of ownership within the park boundaries. Title holders within the park boundaries have signed conservation agreements with CIMA. Un-contacted people have also been considered with respect to this indicator. The evidence provided is sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.22 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section G 5.5

Document Reference: PDD 1.10.4

Finding: Please provide more information in the PDD about the illegal activities that could take place in the Project Zone such as the small-scale mining, hunting, and logging operations discussed during the site visit. In addition, please describe how project activities will reduce these activities.

Client Response: Additional details were added to PDD Section 1.8.1.

Auditor Response: Section 1.8.1 of the PDD has been amended to include other illegal activities brought to our attention during the site visit, along with how the project activities with handle such activities. These additions to the PDD are sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.23 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section CL 1.2, CL 2.4, CL 3.1

Document Reference:

Finding: No non-CO2 gases have been included in the project. Please demonstrate that this in conformance with CCB indicators CL 1.2, CL 2.4, and CL 3.1.

Client Response: Additional information has been added to PDD Section 2.3.1. Treatment in monitoring events is included in PD Section 4.3.3.4.

Auditor Response: The project proponent has amended sections 2.3.1. and 4.3.3.4 to provide evidence

that non-CO2 gasses need not be included in the project and the criteria for including these gasses in the future if found to be significant. These amendments are sufficient for the closing of this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.24 dated 11/06/2012

Standard Reference: CCB Standards Second Edition Section CM3.3

Document Reference: Social Monitoring Plan

Finding: Please demonstrate how the variables selected in the social monitoring plan are directly linked to the project's community development objectives and to anticipated impacts (e.g. reduced soil erosion, improved quality of life, reduction in illegal activities, etc.).

Client Response: Additional information has been added to PDD Section 6.2.2.

Auditor Response: The project proponent has amended Section 6.2.2 of the PDD to include a description of how the variables in the monitoring plan address the community development objectives and anticipated impacts. This information is sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.25 dated 11/14/2012

Standard Reference: CCB Standards Second Edition Section G2.4

Document Reference: PDD 2.4

Finding: The PDD contains a general description of how the "without project" reference scenario affects communities in the project zone. In addition, the PDD gives a description of ecosystem services provided by the project. However, it does not provide a description of the effects of the "without project" reference scenario on communities with respect to the "impacts of likely changes in water, soil and other locally important ecosystem services." Please provide this description.

Client Response: The description is included in PDD Section 2.4.2.2. A summary has been added to the section to make it more transparent.

Auditor Response: Section 2.4.2.2 has been amended to include a summary of how the "without project" scenario impacts the project zone. This information is sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2012.26 dated 11/14/2012

Standard Reference: CCB Standards Second Edition Section G3.7, CM1.1

Document Reference: PDD 1.6, 6.1

Finding: The PDD provides a current assessment of continued funding as the basis for maintaining projects benefits beyond the project lifetime. Please provide a detailed description of how both positive and negative community impacts will be monitored and assessed beyond the project lifetime.

During the site visit, it was discussed that CIMA would work with the communities in the identified critical areas, exiting one community and then working in another, when appropriate. Please include a description of when communities will be 'exited' and new communities engaged.

Client Response: Additional text was added to PDD Sections 1.6 (first part of the finding) and 1.8.1 (second part of the finding).

Auditor Response: The project proponent has added clarification to sections 1.6 and 1.8.1 of the PDD including a description of how project impacts will be monitored beyond the project lifetime (see Plan Maestro's) and an explanation of how CIMA will determine when new communities are included. CIMA states "At no time will a community be "abandoned" by CIMA. CIMA will continue to lend support to communities as appropriate, with the goal of creating self-sufficiencies. The identification of new or growing threats may bring additional communities into priority intervention status." These amendments are sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

CCBA Project	Validation	Report Appendix A
CCBA Complia	ance Check	list – The Cordillera Azul National Park Project

General Section

Conformance

G1. G2. G3. G4. G5.	Original Conditions in the Project Area (Required) Baseline Projections (Required) Project Design and Goals (Required) Management Capacity and Best Practices (Required) Legal Status and Property Rights (Required)	Yes Yes Yes Yes Yes	\mathbb{X}	No No No No	
Clima	ate Section				
CL1. CL2. CL3.	Net Positive Climate Impacts (Required) Offsite Climate Impacts ("Leakage") (Required) Climate Impact Monitoring (Required)	Yes Yes Yes	\mathbb{X}	No No No	
Com	munity Section				
CM1. CM2. CM3.	Net Positive Community Impacts (Required) Offsite Community Impacts (Required) Community Impact Monitoring (Required)	Yes Yes Yes	\mathbb{X}	No No No	
Biodi	versity Section				
B1. B2. B3.	Net Positive Biodiversity Impacts (Required) Offsite Biodiversity Impacts (Required) Biodiversity Impact Monitoring (Required)	Yes Yes Yes	\mathbb{X}	No No No	
Gold	Section				
GL1.	Climate Change Adaptation Benefits (Optional)	Yes		No	\square
GL2.	Exceptional Community Benefits (Optional)	Yes		No No	
GL3.	Exceptional Biodiversity Benefits (Optional)	res	\square	NO	

CCBA Validation Level Attained:

APPROVED (all requirements met) **GOLD** (all requirements and also at least one optional Gold Level criterion met

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