



VM0048 REDUCING EMISSIONS FROM DEFORESTATION AND FOREST DEGRADATION



Document Prepared by Aster Global Environmental Solutions Inc.

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| Methodology Category | Methodology |
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Summary

Aster Global Environmental Solutions, Inc., (Aster Global) was commissioned by Verra to perform the methodology assessment of the VCS methodology “VM0048 *Reducing Emissions from Deforestation and Forest Degradation*” in accordance with the VCS Program Guide, the Methodology Development and Review Process, and the Methodology Requirements.

The Methodology is the over-arching Verra REDD (Reducing Emissions from Deforestation and Degradation) methodology. It constitutes a complete methodology when incorporated with additional modules and tools. It is applicable only for eligible REDD projects defined in Sections A1.5-A1.9 of the VCS Methodology Requirements.

The purpose and scope of this new methodology assessment was to evaluate whether the methodology document was prepared in line with the VCS program requirements. Aster Global's methodology assessment included a detailed review of adherence to the VCS Program Guide, the VCS Methodology Development and Review Process, and the VCS

Methodology Requirements, with regard to applicability conditions, project boundary, baseline approach, additionality, emissions/removals, leakage, monitoring, data and parameters, and adherence to the principles of the VCS rules and requirements (relevance, completeness, consistency, accuracy, transparency and conservativeness). Aster Global's methodology assessment also included a detailed analysis of the methodology, public comments, literature reviews, technical reviews and responses to all non-conformance reports (NCRs), clarifications (CLs), and opportunities for improvement (OFIs) based on the VCS rules and requirements.

The methodology assessment team identified 37 findings (NCRs, CLs and OFIs). All were addressed satisfactorily in line with the VCS program requirements. These NCRs, CLs, and OFIs provided necessary clarity to ensure the methodology was in compliance with the VCS rules and requirements. All findings were appropriately addressed and are depicted in Appendix B.

Aster Global confirms all methodology assessment activities, including objectives, scope and criteria, level of assurance and the methodology's adherence to the VCS Program, as documented in this report, are complete. Aster Global concludes without any qualifications or limiting conditions that VM0048 *Reducing Emissions from Deforestation and Forest Degradation* meets the requirements of the VCS Program. Aster Global recommends that Verra approve the methodology.

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1 INTRODUCTION

1.1 Objective

This methodology assessment was performed to evaluate the likelihood that implementation of the methodology would result in accurate calculations and appropriate eligibility criteria for GHG emission reductions/removals (ISO 14064-3:2019). This report summarizes the findings of the methodology assessment of the Verified Carbon Standard (VCS) methodology development and review process. Verra, referred to as the “Methodology Developer”, has commissioned Aster Global Environmental Solutions, Inc. (Aster Global), referred to as the “Assessment Team,” to perform the methodology assessment of *VM0048 Reducing Emissions from Deforestation and Forest Degradation*, hereafter referred to simply as VM0048 or the Methodology.

This report presents the findings of a qualified methodology assessment team of auditors and experts in methodologies for GHG emissions, who have assessed the methodology and associated REDD module(s) for compliance under the applicable rules of the VCS Program. Section 2 below presents the methodology assessment approach, Section 3 below summarizes the methodology assessment process and conclusions, and Appendix B provides details and resolutions of all individual findings from the methodology assessment process.

1.2 Summary Description of the Methodology

VM0048 is applicable to VCS REDD projects and activities as described in Sections A1.5-A1.9 of the VCS Methodology Requirements and detailed in the Applicability Conditions section (4) of the methodology document. The methodology framework document will incorporate additional modules and tools to comprise a complete REDD methodology. The project description must detail the project proponent’s choice of modules. Currently, the only modules/tools approved under the overarching VM0048 cover project activities that reduce emissions from unplanned deforestation (AUD), as other modules are still in development by Verra. Additional modules and tools are planned to be added later under VM0048 to incorporate the broader depth of REDD project categories.

2 ASSESSMENT APPROACH

2.1 Method and Criteria

This methodology assessment is based on standard auditing techniques in line with Verra Requirements to assess the correctness of the information provided. In accordance with the VCS rules, a methodology assessment encompasses applicability conditions, project boundary,

procedure for demonstrating additionality, procedure for determining baseline scenario, baseline emissions, leakage, quantification of net GHG emission reduction and/or removals, monitoring, data and parameters, and relationships to approved or pending methodologies.

The Verra documents used to assess the Methodology were:

- Program Guide (v4.3, 17 January 2023)
- Program Definitions (v4.3, 21 December 2022)
- Methodology Requirements (v4.3, 17 January 2023)
- Methodology Development and Review Process (v4.2, 17 January 2023)
- Methodology Template (v4.2, 21 December 2022)
- Methodology Assessment Report Template (v4.1, 21 December 2022)
- Validation and Verification Manual (v3.2, 19 October 2016)

Note that the most recent VCS Program documents from 29 August 2023 are not listed above. Per Verra, it was acceptable to report the previous versions used throughout the methodology assessment process, as this current report had already been drafted and review completed prior to the program updates. Further, the new methodology requirements were applicable to methodologies that had not yet solicited public comments.

2.2 Document Review

All documents reviewed in the methodology assessment are in listed in Appendix A.

2.3 Interviews

Interviews were conducted online using Microsoft Teams via typical channels, including the opening meeting, methodology walkthrough, meetings to discuss findings, in addition to email exchanges, phone calls, and the closing meeting. Details and attendees of each meeting are included below:

| Opening Meeting and over-arching methodology walk-through | 04 April 2023 |
|--|-------------------------------------|
| <i>Methodology Assessment Team</i> | <i>Methodology Development Team</i> |
| Matthew Campbell – Aster Global | Julianne Baroody – Verra |
| Mansfield Fisher – Aster Global | Marie Calmel – Verra |
| Janice McMahon – Aster Global | Salvador Sánchez Colón – Verra |
| Shawn McMahon – Aster Global | Basanta Guatam – Verra |
| Caitlin Sellers – Aster Global | Tim Pearson – GreenCollar |

Sandesh Shrestha – Aster Global

Kevin Brown – Wildlife Conservation Society

Justin Ziegler – Aster Global

Meeting to discuss baseline procedures

05 April 2023

Methodology Assessment Team

Methodology Development Team

Matthew Campbell – Aster Global

Julianne Baroody – Verra

Mansfield Fisher – Aster Global

Salvador Sánchez Colón – Verra

Janice McMahon – Aster Global

Tim Pearson – GreenCollar

Shawn McMahon – Aster Global

Kevin Brown – Wildlife Conservation Society

Caitlin Sellers – Aster Global

Sandesh Shrestha – Aster Global

Justin Ziegler – Aster Global

Meeting to discuss activity data procedures

12 April 2023

Methodology Assessment Team

Methodology Development Team

Matthew Campbell – Aster Global

Julianne Baroody – Verra

Mansfield Fisher – Aster Global

Salvador Sánchez Colón – Verra

Caitlin Sellers – Aster Global

Tim Pearson – GreenCollar

Sandesh Shrestha – Aster Global

Kevin Brown – Wildlife Conservation Society

Justin Ziegler – Aster Global

Meeting to discuss leakage procedures

13 April 2023

Methodology Assessment Team

Methodology Development Team

Matthew Campbell – Aster Global

Julianne Baroody – Verra

Mansfield Fisher – Aster Global

Salvador Sánchez Colón – Verra

Sandesh Shrestha – Aster Global

Simon Koenig – Verra

Justin Ziegler – Aster Global

Tim Pearson – GreenCollar

Kevin Brown – Wildlife Conservation Society

Sarah Walker – Wildlife Conservation Society

| | |
|---|----------------------|
| Meetings to discuss uncertainty and other quantitative items | 17 April 2023 |
|---|----------------------|

| | |
|------------------------------------|-------------------------------------|
| <i>Methodology Assessment Team</i> | <i>Methodology Development Team</i> |
| Matthew Campbell – Aster Global | Julianne Baroody – Verra |
| Mansfield Fisher – Aster Global | Marie Calmel – Verra |
| Sandesh Shrestha – Aster Global | Salvador Sánchez Colón – Verra |
| Justin Ziegler – Aster Global | Basanta Guatam – Verra |
| | Tim Pearson – GreenCollar |
| | Till Neef – Independent Expert |

| | |
|--|----------------------|
| Meeting to discuss preliminary Round 1 Findings | 19 April 2023 |
|--|----------------------|

| | |
|------------------------------------|-------------------------------------|
| <i>Methodology Assessment Team</i> | <i>Methodology Development Team</i> |
| Matthew Campbell – Aster Global | Julianne Baroody – Verra |
| Mansfield Fisher – Aster Global | Salvador Sánchez Colón – Verra |
| Sandesh Shrestha – Aster Global | Basanta Guatam – Verra |
| Justin Ziegler – Aster Global | Tim Pearson – GreenCollar |

| | |
|--|----------------------|
| Meeting to discuss draft Round 1 Findings | 27 April 2023 |
|--|----------------------|

| | |
|------------------------------------|-------------------------------------|
| <i>Methodology Assessment Team</i> | <i>Methodology Development Team</i> |
| Mansfield Fisher – Verra | Julianne Baroody – Verra |
| Matthew Campbell – Aster Global | Tim Pearson – GreenCollar |
| Shawn McMahon – Aster Global | |
| Sandesh Shrestha – Aster Global | |
| Justin Ziegler – Aster Global | |

| | |
|---|---------------------|
| Meeting to discuss Public Comments | 27 June 2023 |
|---|---------------------|

| | |
|------------------------------------|-------------------------------------|
| <i>Methodology Assessment Team</i> | <i>Methodology Development Team</i> |
| Shawn McMahon – Aster Global | Julianne Baroody – Verra |
| Matthew Campbell – Aster Global | Salvador Sánchez Colón – Verra |
| Sandesh Shrestha – Aster Global | Tim Pearson – GreenCollar |

Justin Ziegler – Aster Global

 Kevin Brown – Wildlife Conservation Society

Meeting to discuss responses to Round 1 Findings
28 July 2023
Methodology Assessment Team
Methodology Development Team

Shawn McMahon – Aster Global

Julianne Baroody – Verra

Matthew Campbell – Aster Global

Salvador Sánchez Colón – Verra

Justin Ziegler – Aster Global

Naomi Swickard - Verra

Mansfield Fisher – Aster Global

Tim Pearson – GreenCollar

 Sandesh Shrestha – Aster Global

Kevin Brown – Wildlife Conservation Society

Meeting to discuss timing and review status
10 October 2023
Methodology Assessment Team
Methodology Development Team

Mansfield Fisher – Aster Global

Julianne Baroody – Verra

Janice McMahon – Aster Global

Salvador Sánchez Colón – Verra

Shawn McMahon – Aster Global

Judith Simon – Verra

 Sandesh Shrestha – Aster Global

Meeting to check in on Findings
16 October 2023
Methodology Assessment Team
Methodology Development Team

Shawn McMahon – Aster Global

Julianne Baroody – Verra

Justin Ziegler – Aster Global

Salvador Sánchez Colón – Verra

Sandesh Shrestha – Aster Global

Kevin Brown – Wildlife Conservation Society

Closing Meeting
13 November 2023
Methodology Assessment Team
Methodology Development Team

Shawn McMahon – Aster Global

Julianne Baroody – Verra

Caitlin Sellers – Aster Global

Naomi Swickard – Verra

Matthew Campbell – Aster Global

Salvador Sánchez Colón – Verra

Justin Ziegler – Aster Global

Kevin Brown – Wildlife Conservation Society

 Sandesh Shrestha – Aster Global

2.4 Assessment Team

The names, roles, and summary of qualifications/expertise/experience relevant to the methodology assessment team follow:

| Name | Role | Summary of qualifications, expertise, relevant methodology experience |
|----------------------|---|---|
| Shawn McMahon | Lead Assessor and Verra-approved IFM Expert | Vice-President, Lead Assessor, VCS WRC Non-Peatlands Expert. Approved to conduct third-party carbon sequestration validations and verifications under VCS (WRC, REDD, IFM and ARR Expert). He has been conducting validation and verification of AFOLU projects under a variety of programs since 2007. Since 2011 he has served as lead assessor on 15 new and revised methodologies. Specializes in third-party carbon offset validations and verifications, carbon sequestration project development, development and implementation of management plans for enhancement of carbon stocks, development of carbon and environmental asset tracking programs, and team management. |
| Barbara Toole O'Neil | Verra-approved Standardized Methods Expert / Assessment Team Member | Since 2010 she has completed assessments of 14 new methodologies. Her work responsibilities have addressed a wide range of environmental issues from preparing inventories or offset project documents to assessing methodologies submitted to the Verified Carbon Standard (VCS) (forestry to energy efficiency); , validating/ verifying inventories and carbon offset projects, corporate social responsibility auditing, developing governance for sustainability non-profits, to writing a social standard to assess the impact of environmental projects (carbon, water, forestry, agriculture) on the quality of life for women in emerging third world countries. |
| Caitlin Sellers | Assessment Team Member | Ms. Sellers has been involved in environmental, forest, wetland and wildlife projects for over 15 years and has specialized in forest carbon project auditing for 9 years. She is directly involved in validation and verification of forest carbon offsets and methodologies. |
| Mansfield Fisher | Assessment Team Member | Mr. Fisher received his MS in Forestry and MS in Economics from North Carolina State University in |

| | | |
|------------------|--|---|
| | | 2020. Mr. Fisher has worked as a VVB under multiple standards in Forestry and Agriculture for 4 years and is a Lead Validator/Verifier for Forestry Projects under multiple standards. |
| Sandesh Shrestha | Assessment Team Member / GIS & Remote Sensing Specialist | Mr. Shrestha received his MS in Forestry from the University of Maine in 2019. Mr. Shrestha has experience working in multiple projects in the United States and in Nepal. Prior to joining the Aster Global team, he worked as a Geospatial Research Associate with Kentucky State University where he focused on the acquisition, compilation, and processing of geospatial data using satellite imagery, LiDAR, and UAV drones for creating ecosystem assessments, land use/cover change, and watershed modelling. Mr. Shrestha is a published author of numerous research projects in the United States and Nepal related to hydrology, remote sensing applications, LULC change, climate change impact, community perception and vulnerability studies. Mr. Shrestha is a professional member of the Society of American Foresters and Nepal Forester's Association. |
| Matthew Campbell | Assessment Team Member | Mr. Campbell received his MS in Environmental Studies and Graduate Certificate in Geographic Information Sciences (GIS) from University of North Carolina Wilmington in 2016. Previously, Mr. Campbell has worked as a crew lead and field coordinator for forestry crews working on a long-term climate change forestry research project in Sierra Nevada mixed-conifer forests through the University of Nevada Reno. |
| Justin Ziegler | Assessment Team Member / Forest Biometrician | Dr. Ziegler received his Bachelor of Science in Forest Resources from the University of Idaho, and Master of Science and PhD both in Forest Sciences from Colorado State University. Dr. Ziegler has experience as a practicing forester as well as teaching at the university setting, including courses in sampling design, biometry, data analyses and computational modeling. He has 15 publications in forest and fire science, including areas of natural resource inventories, growth-and-yield modeling, and forest carbon measurements. He is certified as a |

| | | |
|----------------|-------------------|--|
| | | Professional Forester with the Society of American Foresters and as a Certified Wildland Fire Ecologist and Wildland Fuels Scientist with the Association for Fire Ecology. |
| Janice McMahon | QA/QC / President | Specializes in natural resource management projects including carbon sequestration feasibility assessments, development and implementation of management plans for enhancement of ecosystem services, assessment of GHG emissions and reductions, development of environmental asset tracking programs, GHG validations and verifications, endangered/ threatened species assessments, habitat management plans, and integrated ecosystem services plans. Responsible for leading the Forestry, Carbon, and GHG Services Division, which includes client and team coordination, proposal preparation and review, marketing presentations, maintenance of Aster Global’s ANSI accreditation and management System, and quality assurance and quality control for projects in the United States as well as the international market. |

2.5 Resolution of Findings

The process of methodology assessment involved 3 (three) formal rounds of evaluation by the assessment team and resulted in a methodology version in conformance with VCS rules. Findings related to corrective action, clarification requests or other findings were resolved during communication between the assessment team and the methodology development team. More specifically, where noted by the assessment team, the methodology development team implemented corrective actions by amending methodology text and requirements and providing written clarification responses. Types of findings were characterized in the following manner:

Non-Conformance Reports (NCRs) were issued as a response to material discrepancies in a part of the methodology and generally fell into one of the following categories:

- Non-conformance to a VCS guiding document listed in Section 2.1 above
- Internal consistency among methodology sections/appendices was lacking
- Mathematical formulae in modules were incorrect
- Additional information was required by the assessment team in order to confirm reasonable assurance for compliance

Clarifications (CL) were issued when language within the methodology needed extra clarification to avoid ambiguity/confusion for the reader.

Opportunities for Improvement (OFI) were issued to the methodology developer when an opportunity for improvement was identified but was not required to be addressed to confirm to VCS rules.

During the course of the methodology assessment, 37 findings (NCRs, CLs, and OFIs) were identified. Of those, Aster Global ensured *reasonable* assurance was achieved to close all findings. Throughout the methodology assessment, all NCRs/CLs were eventually satisfactorily addressed to the standards and requirements of Aster Global and/or VCS. The NCRs/CLs provided necessary clarity to ensure the methodology complied with the requirements of VCS. Detailed summaries of each finding, including the issue raised, responses and final conclusions are provided in Appendix B.

A brief summary of some findings listed includes methodology requirements, uncertainty, additionality, definitions, and equations:

Finding #3: The VCS rules require “Methodologies must be designed to reduce systematic and random error as far as practical. Where relevant, methodologies must set out procedures for projects to estimate residual random error according to recognized statistical approaches, and to apply conservativeness deductions to reduce the risk of overestimating emission reductions due to random error.”¹

The initial version of the methodology stated “Where uncertainty is significant, the project proponent must choose data that indisputably tends to under-estimating, rather than over-estimating, net GHG project benefits.”

Resolution: The assessment team requested more definition around the term “significant,” and the methodology developer added a footnote stating “In line with the VCS Methodology Requirements, uncertainty is deemed significant where it is expected to exceed 10 percent of the estimate.” The assessment team believes this change resulted in a strong definition of “significant.” Thus, the assessment team considered the Finding addressed.

Finding #5: The VCS rules require methodologies “use applicability conditions to specify the project activities to which it applies and shall establish criteria that describe the conditions under which the methodology can (and cannot, if appropriate) be applied. Any applicability conditions set out in tools or modules used by the methodology shall also apply.”²

The initial versions of the methodology seemed to have circular applicability conditions to the VCS Methodology Requirements and inconsistency between methodology and module applicability conditions.

¹ VCS Methodology Requirements, Section 2.4, v4.3, 17 January 2023

² Ibid, Section 3.2.1

Resolution: The methodology developer removed confusing references and generally made the applicability conditions stronger within the module. Though they continue to utilize VCS Methodology Requirements applicability conditions, they assured the assessment team this was sufficient, as all applicability conditions are in line with the VCS Program. The assessment team considered this response sufficient to close the finding.

Finding #14: The methodology originally contained language allowing tidal wetlands to be covered within its scope until a future tidal wetlands-specific methodology revision was released. The assessment team questioned this inclusion and pointed out that all other WRC methodology requirements would then need to be covered within this current methodology.

Resolution: For simplicity, the developer opted to remove the allowance for WRC within the scope of this methodology. This provided the assurance needed for the assessment team to close the finding.

3 ASSESSMENT FINDINGS

VM0048 was found to be in compliance with the principles set out in the VCS Standard and other VCS rules and requirements. The new methodology provides REDD project quantification details, while adhering to the principles of VCS (relevance, completeness, consistency, accuracy, transparency, and conservativeness).

Applicable VCS-approved tools are appropriately cited for determining project significance, baseline, additionality and risk. The methodology assessment addressed specific issues that arose in the methodology, which are pertinent to the above-mentioned principles set forth by the VCS Standard.

3.1 Relationship to Approved or Pending Methodologies

Verra instructed the assessment team that describing the relationship to approved or pending methodologies was not required, as this is a Verra-developed methodology. Thus, this information was not provided by the developer nor reviewed by the assessment team.

3.2 Stakeholder Comments

The methodology was listed for public stakeholder consultation from 31 March 2022 to 30 May 2022. A total of 444 public comments were received during this consultation process. Due to total number of comments, a separate appendix has been prepared (Appendix C). The Assessment Team and Verra both reviewed the public comments and the methodology development team's responses. The assessment team confirmed closure of all public comments. All comments, the developer's response to each comment, any resultant changes to the methodology, and an explanation of appropriateness are included in the Appendix C. This review ensured that the developer has adequately addressed all stakeholder comments.

3.3 Structure and Clarity of Methodology

Through the methodology development and review process, the assessment team ensured the methodology was written in a clear, logical, concise and precise manner in accordance with the Methodology Development and Review Process.

- The developer has followed the instructions in the methodology template and ensured that the methodology's various criteria and procedures are documented in the appropriate sections of the template. This was confirmed through a detailed review of the template requirements within the assessment team's Findings process. Several Findings were issued related to the Methodology's consistency with the template, and all Findings were resolved to ensure VCS requirements were achieved.
- The terminology used in the methodology is consistent with that used in the VCS Program, and GHG accounting generally. The assessment team issued Findings related to VCS definitions, and all Findings were resolved to ensure terminology was consistent.
- The key words must, should and may have been used appropriately and consistently to denote firm requirements, (non-mandatory) recommendations and permissible or allowable options, respectively. This was confirmed through the assessments team's overall read, interpretation, and review process. The developer did change terms as a result of the Findings from the assessment team to be more compatible with VCS rules.
- The criteria and procedures are written in a manner that can be understood and applied readily and consistently by project proponents. Applicable Findings were resolved to ensure this was achieved.
- The criteria and procedures are written in a manner that allows projects to be unambiguously audited. Several Findings were issued to ensure the methodology can be consistently and robustly applied to a broad spectrum of project types. The Findings were resolved sufficiently.

Overall, it is the Assessment Team's opinion that the structure of the methodology document meets the methodological requirements of the VCS Program.

3.4 Definitions

The key terms defined in the methodology and appendix are presented clearly and appropriately in the Definitions sections at the beginning of the documents by the methodology developers for ease of use. The methodology assessment process ensured definitions of key terms are presented concisely and can assist the reader in comprehension for effective implementation of the methodology.

3.5 Applicability Conditions

During the methodology assessment process, the assessment team ensured the applicability condition was appropriate for the activities targeted by the methodology. Quantification procedures required by the methodology adequately target the relevant applicability condition. The applicability condition appropriately specifies relevant requirements to individual projects.

The methodology assessment determined the applicability condition contained within the methodology is appropriate, adequate and in compliance with the VCS Program.

Further, the assessment team determined the applicability condition provided sufficient clarity to projects determining if their activities are or are not eligible under the methodology. The applicability condition addresses environmental integrity and practical considerations, where relevant.

The following summarizes the applicability condition as written, changes made during the revision of the methodology, and the final evaluation of those changes during the methodology assessment.

The applicability condition follows:

“This methodology may only be used for eligible REDD projects and activities described in the VCS Methodology Requirements. The applicability conditions for each activity type are listed in AUDef, and will be listed in APDef and AUdeg.”³

Assessment:

The initial version of the methodology did not actually include an explicit condition but deferred to other modules for the applicability conditions associated with the specified activities. The assessment team drew attention to this, which resulted in a revision to include the condition above. Previous iterations of the condition did not include the mandatory language required by VCS and it also referred to sections of the VCS Methodology Requirements that could change in the future, rendering those section references incorrect. The assessment team also commented on this, and the developer opted to revise the language of the applicability condition to be more flexible with future possible changes to VCS Program documents and future module additions.

3.6 Project Boundary

The VCS Methodology Requirements require the methodology establish criteria and procedures for describing the project boundary and identifying and selecting optional carbon pools, e.g., sources, sinks, and reservoirs relevant to the baseline and project scenarios. Procedures to quantify emissions are appropriately included in all required carbon pools.

The methodology provides clear criteria and procedures for defining the spatial boundaries of the project. The methodology provides a clear diagram of carbon pools and sources (Tables 2 and 3 respectively). The assessment team’s comments are included below:

Carbon pools included in or excluded from the REDD project boundary

³ VM0048, V1.0, 13 November 2023, Page 7

| Pool | Included? | Justification/Explanation | Assessment Comments |
|------------------------------|---------------------|--|--|
| Aboveground tree biomass | Included | Major carbon pool that will significantly decrease in the baseline scenario in the case of deforestation or forest degradation. | The assessor confirms that inclusion of this GHG source is appropriate. |
| Belowground tree biomass | Included | Major carbon pool that will significantly decrease in the baseline scenario in the case of deforestation or forest degradation. | The assessor confirms this is a major carbon pool for the methodology. It is clearly specified and appropriate for project activities covered by the methodology. |
| Aboveground non-tree biomass | Included | Must be included in the baseline (post-deforestation carbon stocks) but may be conservatively excluded from forest carbon stocks. | This source is appropriately required in the baseline but can be conservatively excluded or included in the project scenario. The assessor confirms it is appropriate for the project activities and clearly specified in the methodology. |
| Belowground non-tree biomass | Optional | Potential emissions are negligible. | The pool was deemed optional, as potential emissions are negligible. The assessor confirms it is appropriate for the project activities and clearly specified in the methodology. |
| Dead wood | Optional | Conservative to exclude | The pool was deemed optional, as potential emissions are conservative to exclude. The assessor confirms it is appropriate for the project activities and clearly specified in the methodology. |
| Litter | Optional | Conservative to exclude | The pool was deemed optional, as potential emissions are conservative to exclude. The assessor confirms it is appropriate for the project activities and clearly specified in the methodology. |
| Soil organic carbon | Optional / Included | <p>Non-wetland soils: Conservative to exclude</p> <p>Wetland soils: Major carbon pool that may significantly increase or decrease in both the baseline and project scenarios. Appendix 1 of this methodology must be used to determine significance.</p> | In some cases, projects may include activities in wetland areas that are not required to use WRC-specific methodologies. They must include SOC and determine its significance with a separate Appendix 1 of the methodology, which is appropriate and clearly specified. |

| Pool | Included? | Justification/Explanation | Assessment Comments |
|-------------------------|-----------|---|---|
| Harvested wood products | Optional | May be excluded where timber harvest is negligible in the baseline case. Appendix 1 of this methodology must be used to determine significance. | If harvests are non-negligible in the baseline case, projects must include HWP. Appendix 1 would need to be used to determine significance. This is clear and appropriately specified in the methodology. |

GHG sources included in or excluded from the REDD project boundary

| Source | Gas | Included? | Justification/Explanation | Assessment Comments | |
|----------|----------------------------|------------------|---------------------------|---|--|
| Baseline | Burning of woody biomass | CO ₂ | Included | Major emissions source | The assessor confirms that inclusion of this GHG source is appropriate. |
| | | CH ₄ | Optional | Non-CO ₂ gases emitted from woody biomass burning – it is conservative to exclude. | The assessor confirms the optional inclusion of this GHG source is appropriate, as exclusion is conservative. |
| | | N ₂ O | Optional | | The assessor confirms the optional inclusion of this GHG source is appropriate, as exclusion is conservative. |
| | Combustion of fossil fuels | CO ₂ | Optional | May be excluded where determined negligible | The assessor confirms the optional inclusion of this GHG source is appropriate if source is determined to be negligible. |
| | | CH ₄ | Excluded | Potential emissions are negligible. | The assessor confirms exclusion of this GHG source is conservative and that specification of this source is clear and appropriate for project activities |

| Source | Gas | Included? | Justification/Explanation | Assessment Comments | |
|---------|--------------------------|------------------|-------------------------------------|--|--|
| | | | | covered by the methodology. | |
| | N ₂ O | Excluded | Potential emissions are negligible. | The assessor confirms exclusion of this GHG source is conservative and that specification of this source is clear and appropriate for project activities covered by the methodology. | |
| | Use of fertilizers | CO ₂ | Excluded | Potential emissions are negligible. | The assessor confirms exclusion of this GHG source is conservative and that specification of this source is clear and appropriate for project activities covered by the methodology. |
| | | CH ₄ | Excluded | Potential emissions are negligible. | The assessor confirms exclusion of this GHG source is conservative and that specification of this source is clear and appropriate for project activities covered by the methodology. |
| | | N ₂ O | Optional | May be excluded where determined negligible | The assessor confirms the optional inclusion of this GHG source is appropriate if source is determined to be negligible. |
| Project | Burning of woody biomass | CO ₂ | Included | Major emissions source | The assessor confirms that inclusion of this GHG source is appropriate. |
| | | CH ₄ | Included | Major emissions source | The assessor confirms that inclusion of this |

| Source | Gas | Included? | Justification/Explanation | Assessment Comments |
|----------------------------|------------------|-----------|--|--|
| | | | | GHG source is appropriate. |
| | N ₂ O | Included | Major emissions source | The assessor confirms that inclusion of this GHG source is appropriate. |
| Combustion of fossil fuels | CO ₂ | Optional | <p>Emissions associated with the combustion of fossil fuels due to leakage prevention activities are always considered insignificant.</p> <p>Emissions associated with other activities (e.g., monitoring, patrolling) must be demonstrated as negligible to be omitted.</p> | The assessor confirms the optional inclusion of this GHG source is appropriate if source is determined to be negligible. |
| | CH ₄ | Excluded | Potential emissions are negligible. | The assessor confirms exclusion of this GHG source is conservative and that specification of this source is clear and appropriate for project activities covered by the methodology. |
| | N ₂ O | Excluded | Potential emissions are negligible. | The assessor confirms exclusion of this GHG source is conservative and that specification of this source is clear and appropriate for project activities covered by the methodology. |
| | CO ₂ | Excluded | Potential emissions are negligible. | The assessor confirms exclusion of this GHG source is conservative and that specification of this source is clear and appropriate for project activities |
| Use of fertilizers | CO ₂ | Excluded | Potential emissions are negligible. | The assessor confirms exclusion of this GHG source is conservative and that specification of this source is clear and appropriate for project activities |

| Source | Gas | Included? | Justification/Explanation | Assessment Comments |
|--------|------------------|-----------|--|--|
| | | | | covered by the methodology. |
| | CH ₄ | Excluded | Potential emissions are negligible. | The assessor confirms exclusion of this GHG source is conservative and that specification of this source is clear and appropriate for project activities covered by the methodology. |
| | N ₂ O | Optional | Must be included where fertilizer use increases due to the project (e.g., as a leakage avoidance mechanism). Otherwise, it may be excluded if it is also excluded from the baseline. | The assessor confirms the optional inclusion of this GHG source is appropriate, unless source is increased through project activities. |

3.7 Baseline Scenario

Requirements for determining the baseline scenario work in concert with the additionality requirements and must be determined prior to the start date of project activities. A 3-step process is required to determine the most plausible land use scenario from the VCS tool VT0001. Once a scenario is determined, the quantification of GHG emissions and reductions must occur under the applicable activity-type module.

Throughout the assessment process, the assessment team reviewed and assessed the required process to identify the baseline scenario. The initial version did not contain a detailed process for projects to identify the baseline but referred to other sections. However, the questioning in the assessment process yielded a revised baseline requirements section, which detailed the above-referenced steps and resulted in a version of the methodology document that was clear and consistent with VCS Methodology Requirements.

3.8 Additionality

The methodology requires projects to use the most recent version of the VCS-approved tool *VT0001 Tool for the Demonstration and Assessment of Additionality in VCS AFOLU Project Activities*. The methodology then requires projects to establish regulatory surplus in accordance with the VCS Standard and Methodology Requirements. As these are all VCS Program documents, the assessment team confirms the requirements to determine

additionality result in a version of the methodology document that was clear and consistent with VCS Methodology Requirements.

3.9 Quantification of GHG Emission Reductions and Removals

3.9.1 Baseline Emissions

The methodology is a framework document, and thus it relies on application of the relevant activity modules for estimating net baseline carbon stock changes and greenhouse gas emissions. The first activity module (VMD0055 Estimation of Emissions Reductions from Avoiding Unplanned Deforestation, v1.0) was also assessed as part of the methodology assessment. The assessment and appropriateness of baseline emissions for VMD0055 are detailed in a separate report. The methodology includes general procedures for estimating baseline emissions, indicating the same procedures must be followed for *ex ante* estimation and for *ex post* monitoring. Additionally, guidance on baselines reassessments and transitioning from previous REDD methodologies to the new methodology is included.

3.9.2 Project Emissions

The methodology is a framework document, and thus it relies on application of the relevant activity modules for estimating net carbon stock changes and GHG emissions in the project scenario. The first activity module (VMD0055 Estimation of Emissions Reductions from Avoiding Unplanned Deforestation, v1.0) was also assessed as part of the methodology assessment. The assessment and appropriateness of project emissions for VMD0055 are detailed in a separate report. The methodology indicates that the same procedures must be followed for *ex ante* estimation and for *ex post* monitoring.

3.9.3 Leakage

The methodology is a framework document, and thus relies on the relevant activity modules for estimating net carbon stock changes and GHG emissions due to activity shifting leakage. Leakage due to market effects must be considered using the external LK-ME module effects where the project leads to a significant decrease in timber, fuelwood, or charcoal production. Emissions from leakage prevention activities must be accounted for if emissions from carbon stock changes, biomass burning, and/or increased fertilizer use are deemed significant. These procedures are to be determined using the relevant activity module, noting the external E-NA module must be used to determine emissions from increased fertilizer use. The first activity module (VMD0055 Estimation of Emissions Reductions from Avoiding Unplanned Deforestation, v0.8) was also assessed as part of the methodology assessment. The assessment and appropriateness of leakage for VMD0055 are detailed in a separate report. Appendix 1 of the methodology is used to determine the significance of leakage and carbon pools.

3.9.4 Net GHG Emission Reductions and Removals

The methodology includes a single equation that is used to calculate the number of VCUs for a given monitoring period. This calculation includes summing the calculated VCUs of all project activities housed under the methodology framework, including unplanned deforestation, planned deforestation, and unplanned forest degradation. While the underlying processes for calculating the VCUs (including the associated uncertainty) from project activities are found within the respective activity modules, the assessment team can confirm that the sole equation is appropriate and without error and provides an appropriately conservative quantification of net reduction of the net reduction or sequestration of greenhouse gas emissions.

3.10 Monitoring

This methodology is a framework document, and thus relies on application of the relevant activity modules for identifying data, parameters and procedures for monitoring. The first activity module “VMD0055 Estimation of Emission Reductions from Avoiding Unplanned Deforestation v1.0” was also assessed under the methodology review process. A list of data, parameters and procedures available at validation and monitored is presented in the module VMD0055. The assessment and appropriateness of data and parameters for VMD0055 are described in a separate report.

The monitoring plan is developed accordingly to ensure that procedures to measure the data and parameters achieve a certain level of assurance. The integrity of each monitoring data and parameters is attained through the reporting of the following information in the monitoring plan, e.g., sampling design, data collection procedures, frequency of monitoring, data archiving, and QA/QC procedures. The assessment team confirms the monitoring plan ensures GHG emission reductions and removals are monitored and reported appropriately.

3.11 Uncertainty

The methodology is a framework document, and thus relies on application of the relevant activity modules for calculating uncertainty. The first activity module (VMD0055 Estimation of Emissions Reductions from Avoiding Unplanned Deforestation, v1.0) was also assessed as part of the methodology assessment. The assessment and appropriateness of uncertainty for VMD0055 are described in a separate report.

3.12 Verifiable

After completion of the full methodology assessment, the assessment team confirms with *reasonable* assurance that the methodology is sufficiently clear and specific to require project developers to transparently report project results that can pass validation and verification audits with high confidence.

4 ASSESSMENT CONCLUSION

Aster Global Environmental Solutions, Inc., has completed the methodology assessment of VM0048 Reducing Emissions from Deforestation and Forest Degradation, (Version 1.0, dated 13 November 2023). The assessment team confirms the methodology adheres to the criteria established for this methodology assessment, which are documented and complete. Aster Global concludes without any qualifications or limiting conditions that the methodology documentation meets the requirements of the VCS Program Guide, VCS Methodology Requirements, and the VCS Methodology Development and Review Process. Therefore, Aster Global recommends that Verra approve the methodology (VM0048 Reducing Emissions from Deforestation and Forest Degradation, V1.0, 13 November 2023) as prepared by Verra.

5 EVIDENCE OF FULFILMENT OF VVB ELIGIBILITY REQUIREMENTS

As stated in the VCS Methodology Development and Review Process, “The criteria for eligible validation/verification bodies are set out in Section 5 of the VCS Program Guide.”⁴

Further, the Program Guide Section 5 states “Validation/verification bodies are also eligible to conduct methodology assessments (validation) of methodologies under the methodology development and review process. The validation/verification body shall hold accreditation for validation for the sectoral scope(s) applicable to the methodology. Where the methodology falls under more than one sectoral scope, the validation/verification body shall hold accreditation for validation for all relevant sectoral scopes. Validation/verification bodies shall ensure the assessment team includes experts with subject-matter expertise in all areas relevant to the proposed project activity. Validation/verification bodies may contract external experts where needed to meet this requirement.”⁵

Aster Global fulfils the eligibility requirements in the following ways:

- Aster Global is accredited by the ANSI National Accreditation Board (ANAB) under the following:

| | |
|--|---|
| Rank | ISO/IEC 17029:2019 expires 08 March 2027 Certificate Here |
| Environmental Information | ISO 14065: 2020 |
| Greenhouse Gas | ISO 14064-3:2019 |
| Project Level Verification of Assertion related to GHG emissions reductions and removals | |

⁴ VCS Methodology Development and Review Process, v4.3, 29 August 2023, Page 10

⁵ VCS Program Guide, V4.4, 29 August 2023, Page 14


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|---|---|
| Group 01 | GHG emission reductions from fuel combustion |
| Project Level Verification/Validation of Assertion related to GHG emissions reductions and removals | |
| Group 03 | Land Use and Forestry, subgroup ART TREES |
| Group 05 | Livestock |
| Group 06 | Waste Handling and Disposal |
| Organization Level Verification of assertions related to GHG emissions and removals | |
| Group 01 | General, subgroup CORSIA |
| Group 02 | Manufacturing |
| Group 03 | Power Generation |
| Group 05 | Mining and Mineral Production |
| Group 06 | Metals |
| Group 07 | Chemical Production |
| Group 08 | Oil and gas extraction, production and refining, including petrochemicals |
| Group 09 | Waste |

- Aster Global utilized Shawn McMahon (WRC non-peatlands, IFM, ALM, and REDD expert) and Barbara Toole O'Neil (Standardized Methods expert) as VCS-approved experts who participated in the comprehensive review. Aster Global also utilized a remote sensing expert and forest biometricians with experience in relevant aspects of the methodology assessment.
- To date, Aster Global has completed greater than 19 VCS methodology assessments under AFOLU and is currently assessing 2 additional VCS methodologies.

6 SIGNATURE

Signed for and on behalf of:

Name of entity: Aster Global Environmental Solutions, Inc.

Signature: 

Name of signatory: Shawn McMahon

Date: 15 November 2023

APPENDIX A: LIST OF DOCUMENTS RECEIVED FROM CLIENT

| Name | Date Received |
|---|---------------|
| VM0184, Methodology for reducing emissions from deforestation and degradation PREVIEW for planning.docx | 3/20/2023 |
| VMD00XX, Module for Avoiding Unplanned Deforestation PREVIEW for planning.docx | 3/20/2023 |
| M0184, Methodology for reducing emissions from deforestation and degradation 2023.04.03.docx | 4/3/2023 |
| MD00XX, Module for Avoiding Unplanned Deforestation 2023.04.03.docx | 4/3/2023 |
| 2023.04.04 kickoff call slides.pdf | 4/4/2023 |
| M0184, Methodology for reducing emissions from deforestation and degradation 2023.04.03.docx | 4/4/2023 |
| MD00XX, Module for Avoiding Unplanned Deforestation 2023.04.03.docx | 4/4/2023 |
| Neeff2021_Article_WhatIsTheRiskOfOverestimatingE.pdf | 4/4/2023 |
| REDD meth assessment kick-off call-20230404_110921-Meeting Recording.mp4 | 4/4/2023 |
| MD00XX AUDef Validation Demo for Aster 2023.04.11.xlsx | 4/11/2023 |
| MD00XX, Module for Avoiding Unplanned Deforestation 2023.04.11 clean.docx | 4/11/2023 |
| MD00XX, Module for Avoiding Unplanned Deforestation 2023.04.11 TC.docx | 4/11/2023 |
| MD00XX, Estimation of Emission Reductions from Avoiding Unplanned Deforestation v0.3.docx | 5/11/2023 |
| MD00XX, Estimation of Emission Reductions from Avoiding Unplanned Deforestation v0.3.pdf | 5/11/2023 |
| 21148.00_Verra REDD Meth and AUD Mod_Assessment_Round 1 Findings_Draft_V2_20230417 Verra copy.xlsx | 5/16/2023 |
| AUDD Modules - Response to comments 2023.05.16.xlsx | 5/16/2023 |
| M0184, Methodology for reducing emissions from deforestation and degradation 2023.05.10 v0.2.docx | 5/16/2023 |
| MD00XX, Estimation of Emission Reductions from Avoiding Unplanned Deforestation 2023.05.10 v0.2.docx | 5/16/2023 |
| Shell response on Verra VCS AUDD procedures May2022[43].pdf | 5/16/2023 |
| TerraCarbon_VERRAResponses_6122.docx | 5/16/2023 |
| WCS - REDD Modules - CommentsMay2022.docx | 5/16/2023 |
| 2023.05.22 Allocation Tool V5 DRAFT FOR VVB REFERENCE.xlsx | 6/19/2023 |
| UDef-RP_Draft_0.1 DRAFT FOR VVB REFERENCE.docx | 6/19/2023 |
| JNR_Allocation_Tool_v4.0.xlsx | 6/20/2023 |
| UDef-RP_Draft_0.1 DRAFT FOR VVB REFERENCE.docx | 6/20/2023 |
| 21148.00 Verra REDD Meth and AUD Mod Assessment Round 1 Findings_V1.1_20230627 Verra.xlsx | 6/29/2023 |

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|---|------------|
| M0184, Methodology for reducing emissions from deforestation and degradation v0.3 clean.docx | 6/29/2023 |
| M0184, Methodology for reducing emissions from deforestation and degradation v0.3.docx | 6/29/2023 |
| MD00XX, Estimation of Emission Reductions from Avoiding Unplanned Deforestation v0.3 clean.docx | 6/29/2023 |
| MD00XX, Estimation of Emission Reductions from Avoiding Unplanned Deforestation v0.3.docx | 6/29/2023 |
| 21148.00 Verra REDD AUD Public Comments Round 1 Findings_V1_20230627.xlsx | 8/8/2023 |
| M0184, Methodology for reducing emissions from deforestation and degradation v0.4.docx | 8/8/2023 |
| MD00XX, Estimation of Emission Reductions from Avoiding Unplanned Deforestation v0.4.docx | 8/8/2023 |
| 21148.00 Verra REDD AUD Public Comments Round 1 Findings_V1_20230627 rev.xlsx | 8/11/2023 |
| M0184, Methodology for reducing emissions from deforestation and degradation v0.4.docx | 8/11/2023 |
| 21148.00 Verra REDD Meth and AUD Mod Assessment Round2Findings_Final_20230910 Verra rev.xlsx | 9/21/2023 |
| 21148.00 Verra REDD Meth and AUD Mod Assessment Round2Findings_Final_20230910 Verra.xlsx | 9/21/2023 |
| M0184, Methodology for reducing emissions from deforestation and degradation v0.5.docx | 9/21/2023 |
| MD00XX, Estimation of Emission Reductions from Avoiding Unplanned Deforestation v0.5.docx | 9/21/2023 |
| 21148.00 Verra REDD Meth and AUD Mod Assessment Round2Findings_Final_20230910 Verra rev2.xlsx | 9/22/2023 |
| M0184, Methodology for reducing emissions from deforestation and degradation v0.5.docx | 9/22/2023 |
| MD00XX, Estimation of Emission Reductions from Avoiding Unplanned Deforestation v0.5 rev.docx | 9/22/2023 |
| 21148.00 Verra REDD AUD Public Comments Round 2_20230929.xlsx | 10/5/2023 |
| M0184, Methodology for reducing emissions from deforestation and degradation v0.6.docx | 10/5/2023 |
| MD00XX, Estimation of Emission Reductions from Avoiding Unplanned Deforestation v0.6.docx | 10/5/2023 |
| 21148.00 Verra REDD AUD Public Comments Round 3_Final_20231011.xlsx | 10/17/2023 |
| 21148.00 Verra REDD Meth and AUD Mod Assessment Round3_Final_20231011 version a.xlsx | 10/17/2023 |
| DRAFT for VVB Clarifications Standard & Meth Requirements 2023.10.17.docx | 10/17/2023 |
| M0184, Reducing emissions from deforestation and forest degradation v0.7a.docx | 10/17/2023 |
| MD00XX, Estimation of Emission Reductions from Avoiding Unplanned Deforestation v0.7a.docx | 10/17/2023 |

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| 21148.00 Verra REDD Meth and AUD Mod Assessment Round3_Final_20231011 version b.xlsx | 10/18/2023 | 3 |
| M0184, Reducing emissions from deforestation and forest degradation v0.7b.docx | 10/18/2023 | 3 |
| MD00XX, Estimation of Emission Reductions from Avoiding Unplanned Deforestation v0.7b.docx | 10/18/2023 | 3 |
| 21148.00 Verra REDD AUD Public Comments Round 3_Final_20231011 comments.xlsx | 10/25/2023 | 3 |
| 21148.00 Verra REDD Meth and AUD Mod Assessment_version b_Round4_Final.xlsx | 11/1/2023 | 3 |
| VM0048 Reducing emissions from deforestation and forest degradation v0.8.docx | 11/1/2023 | 3 |
| VMD0055 Estimation of Emission Reductions from Avoiding Unplanned Deforestation v0.8.docx | 11/1/2023 | 3 |
| 21148.00 Verra REDD Meth and AUD Mod Assessment_version b_Round4_Final rev.xlsx | 11/2/2023 | 3 |
| VMD0055 Estimation of Emission Reductions from Avoiding Unplanned Deforestation v0.8 rev.docx | 11/2/2023 | 3 |
| 21148.00 Verra REDD Meth and AUD Mod Assessment_version b_Round4_Final rev2.xlsx | 11/10/2023 | 3 |
| 21148.00 Verra REDD AUD Public Comments 2023.11.13.xlsx | 11/13/2023 | 3 |
| VM0048 Reducing Emissions from Deforestation and Forest Degradation FINAL DRAFT.docx | 11/13/2023 | 3 |
| VMD0055 Estimation of Emission Reductions from Avoiding Unplanned Deforestation FINAL DRAFT.docx | 11/13/2023 | 3 |

APPENDIX B: LIST OF FINDINGS

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| Finding Number | 1 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | Where external documents are referenced, such as the 2019 Refinement to the 2006 IPCC Guidelines for National GHG Inventories , and such documents are updated, the most recent version of the document shall be used. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | REDD Methodology |
| Findings | <p>Section 7 Additionality states "Examples include the latest versions of the IPCC 2006 Guidelines for National GHG Inventories (including 2019 refinement). It is unclear why the 2006 guidelines are listed first, the 2019 Refinement listed afterwards.</p> <p>The methodology includes references to the IPCC 2006 Guidelines. For example, Section 9.3.1 of the Methodology, in reference to expert judgement references a specific section of the IPCC 2006 Guidelines. However, review of the 2019 refinement shows that the referenced section has been updated. As such it is unclear how this requirement is met.</p> |
| Round NCR/CL/OFI | <p>1</p> <p>CL: Please clarify why 2006 Guidelines are referenced first, with the 2019 Refinement mentioned afterward.</p> <p>CL: Please ensure references to the 2019 Refinement are included as required.</p> |
| Round 1 Response from Methodology Development Team | <p>The reference is correct as it is. The 2006 version is referred to first because "...the 2019 Refinement does not revise the 2006 IPCC Guidelines, but updates, supplements and/or elaborates the 2006 IPCC Guidelines where gaps or out-of date science have been identified. It will not replace the 2006 IPCC Guidelines, and should be used in conjunction with the 2006 IPCC Guidelines."</p> <p>The 2019 Refinement has been added to the list of References</p> |

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| Round 2 Findings | <p>Section 7 of the revised version of the methodology now states " Examples include the latest versions of the IPCC 2006 Guidelines for National GHG Inventories (including 2019 Refinement) or the IPCC 2003 Good Practice Guidelines for Land Use, Land-Use Change and Forestry."</p> <p>Section 10 References now states: IPCC (2003). Good Practice Guidance for Land Use, Land Use Change and Forestry. Institute for Global Environmental Strategies (IGES).</p> <p>IPCC (2006). 2006 IPCC Guidelines for National Greenhouse Gas Inventories. Institute for Global Environmental Strategies (IGES).</p> <p>IPCC (2019) 2019 Refinement to the 2006 IPCC Guidelines on National Greenhouse Gas Inventories (IGES).</p> <p>These items are addressed.</p> |
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| Finding Number | 2 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | 2.2.4 A standardized method shall be used as the preferred option for determining additionality. Where a methodology does not employ a standardized method for additionality, the proponent shall provide a justification for why such an approach is not appropriate or possible. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Section 7 REDD Methodology |
| Findings | Section 7 of the Methodology states that VT001 will be used to determine additionality. As the methodology does not use a standardized approach for determining additionality, it is unclear why a justification is not provided in line with this requirement. |
| Round 1 NCR/CL/OFI | 1 CL: Please clarify why use of a standardized method for determining additionality is not appropriate/possible in line with this requirement. |
| Round 1 Response from Methodology Development Team | Added a footnote in Section 7 of the methodology stating "At the time of publication, insufficient research has been done about the use of standardized methods in the context of REDD projects." |
| Round 2 Findings | The added footnote in Section 7 sufficiently ensures that the methodology developer meets the requirement that they "shall provide a justification for why such an approach is not appropriate or possible." This item is addressed. |

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| Finding Number | 3 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | Methodologies must be designed to reduce systematic and random error as far as practical. Where relevant, methodologies must set out procedures for projects to estimate residual random error according to recognized statistical approaches, and to apply conservativeness deductions to reduce the risk of overestimating emission reductions due to random error. |

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| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Methodology 9.3.1 |
| Findings | The methodology states "Where uncertainty is significant, the project proponent must choose data that indisputably tends to under-estimating, rather than over-estimating, net GHG project benefits.". It is unclear what the standard for significant is. |
| Round NCR/CL/OFI | 1 CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Development Team | Footnote added to this sentence stating: "In line with the VCS Methodology Requirements, uncertainty is deemed significant where it is expected to exceed 10 percent of the estimate". |
| Round 2 Findings | Footnote 4 now states "4 In line with the VCS Methodology Requirements, uncertainty is deemed significant where it is expected to exceed 10 percent of the estimate." This aligns with Section 2.4.2 of the Methodology requirements describing a 10% uncertainty value. This item is addressed. |

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| Finding Number | 4 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | 2.6.2 Where a methodology combines AFOLU project categories, the methodology shall adhere to all sets of requirements pertaining to each and every project category covered, either separating activities, or where activities cannot be separated, taking a conservative approach to each requirement. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Section 2 REDD Methodology |
| Findings | While the methodology itself does not combine project categories, Section 2 of the methodology states " Project proponents may choose to apply other approved VCS methodologies to activities in this same project to account for emission reductions and removals from project activities not currently covered by this methodology." It is unclear why this is included in the methodology, as it is covered in the VCS Standard. |
| Round NCR/CL/OFI | 1 CL: Please clarify how the referenced language is appropriate, as it appears to address a requirement that is covered in the VCS Standard. |
| Round 1 Response from Methodology Development Team | We shortened this sentence to "For avoiding planned forest degradation, see the improved forest management category of methodologies." This part is important to retain as it relates to an activity category to that people would generally expect to be covered under REDD, and this methodology is branded is Verra's REDD methodology. |
| Round 2 Findings | The shortened sentence includes important context that will drive the reader to existing IFM methodologies for avoiding planned forest degradation, while not re-stating VCS Standard requirements. This item is addressed. |

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| Finding Number | 5 |
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| VCS Methodology Requirements v4.3 17 January 2023 (Description) | 3.2.1 Methodologies shall use applicability conditions to specify the project activities to which it applies and shall establish criteria that describe the conditions under which the methodology can (and cannot, if appropriate) be applied. Any applicability conditions set out in tools or modules used by the methodology shall also apply. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | REDD Methodology, AUD Module |
| Findings | <p>Section 4 of the REDD Methodology lists a single applicability condition then states applicability conditions for relevant accounting modules must be met in addition. It is unclear how reliance on applicability conditions set within relevant modules are appropriate. Further, as several modules have yet to be developed, it is unclear whether some applicability conditions will be applied in all modules, and thus would be better suited to be included within the text of the methodology itself.</p> <p>The VT0001 v3.0 tool Section 1.2 (Applicability) states "The use of this tool to determine additionality requires the baseline methodology to provide for a stepwise approach justifying the determination of the most plausible baseline scenario."</p> <p>Section 4 of the CP-AB module states "Non-tree aboveground biomass must be included as part of the project boundary if the following applicability criteria are met (per framework module REDD-MF): -Stocks of non-tree aboveground biomass are greater in the baseline than in the project scenario, and -Non-tree aboveground biomass is determined to be significant (using the T-SIG module). Belowground (tree and non-tree) biomass are not required for inclusion in the project boundary because omission is conservative." However, Section 5.2 of the Methodology states "Any significant decreases in carbon stock in the project scenario and any significant increases in carbon stock in the baseline scenario must be accounted for. "</p> |

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| <p>Round NCR/CL/OFI</p> | <p>1 CL: Please clarify how referring to applicability conditions in respective modules is appropriate.</p> <p>CL: As several modules have yet to be developed, it is unclear if several applicability conditions will be included in all modules. If conditions will be included in all modules, it is unclear why they are not included in the methodology itself.</p> <p>CL: It is unclear to the VVB if projects applying this methodology meet the applicability condition referenced in the finding.</p> <p>NCR: Please ensure that both the methodology and the AUD Module requirements are consistent with the applicability conditions of the modules referenced in the Methodology and provide a demonstration the VVB demonstrating that all Applicability conditions within the referenced tools are consistent with the rules of the methodology.</p> |
| <p>Round 1 Response from Methodology Development Team</p> | <p>Clarified in M0184 that the applicability conditions set out in M0184 apply to all projects using the methodology.</p> <p>If applicability conditons for the yet-to-be-developed modules are consistent across the already developed modules, they will be elevated to the methodology level. The exception would be if a module is developed that is intended to stand on its own and would therefore need to incorporate the M0184 applicability conditions.</p> <p>VT0001 will soon be updated and the requirement in question will be removed for this methodology.</p> <p>Section 5.2 has been edited with regard to required pools and reflecting text in CP-AB pools can be excluded where conservative or demininis.</p> |

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| <p>Round 2 Findings</p> | <p>The assessment team notes that the singular applicability condition identified in previous versions of the methodology has been removed and is now replaced with the statement "Activities accounted for by this methodology must meet the eligibility criteria for REDD activities in Section A.1.5-A.1.9 of the VCS Methodology Requirements." Appendix 1 of the VCS Methodology Requirements states proposed AFOLU methodologies "...and shall meet with the criteria and requirements set out below." It is unclear to the assessment team if the referenced criteria and requirements are considered appropriate applicability conditions. The Validation and Verification Manual states "Keep in mind Methodologies must not restate VCS requirements." This is how the assessment team has reviewed past methodologies under this guidance.</p> <p>As the additional modules have yet to be developed it is not possible to know whether applicability conditions will be consistent across modules. The methodology developer's response that they may be elevated to the methodology is appropriate and reasonable. This item is addressed.</p> <p>The methodology developer noted that VT0001 will soon be updated and the requirement in question removed for this methodology. The assessment team notes that VT0001 is no longer used for determining additionality for this methodology. It is unclear if the statement made by the methodology developer implies that once VT0001 is updated to remove the referenced requirement, it will again be used for determining additionality, or if the newly included additionality procedures is intended to permanently replace VT0001.</p> |
| <p>Round 2 NCR/CL/OFI</p> | <p>CL: Please provide additional clarification regarding the appropriateness of re-stating VCS [Methodology] Requirements for the applicability conditions.</p> <p>CL: Please provide further clarification in line with the finding pertaining to the current/future inclusion of VT0001 in the methodology.</p> |
| <p>Round 2 Response from Methodology Development Team</p> | <p>CL: Section 4. Applicability Conditions has been reworded to clarify, first, that M0184 is applicable only to REDD projects/activities that are eligible as per A.1.5-A.1.9 of the VCS Methodology Requirements, AND that applicability conditions specific to each activity type are described in the relevant accounting modules, as they become available (as of today, only the AUDef module is available).</p> <p>CL: References to VT0001 have been entirely removed from MD0184, and the new procedures included therein replace its use entirely.</p> |
| <p>Round 2 Response from VCS Program Methodologies Director</p> | |
| <p>Round 3 Findings</p> | <p>Although the assessment team believes the Applicability Conditions should be discreetly listed within this section, as consistent with other methodologies approved, we will defer to Verra's reference to the Methodology Requirements, noting those sub-sections may change with future iterations of the Methodology Requirements. This item is addressed.</p> |

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| Finding Number | 6 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | 3.2.3 Applicability conditions must not contain procedures or obligations upon the project proponent. Rather, they must be conditions against which project eligibility can be determined at the time of validation and must not require the project proponent to undertake ongoing actions to ensure continued eligibility. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Section 4 REDD Methodology |
| Findings | The applicability condition defined in Section 4 of the REDD Methodology states " The exclusion of land in the project area from any GHG program must be monitored over time and reported in the monitoring reports." It is unclear how this in line with this requirement, as this applicability condition appears to require project proponents to undertake ongoing action to ensure continued eligibility. |
| Round NCR/CL/OFI | 1 CL: Please clarify how the referenced applicability condition as defined complies with this requirement. |
| Round 1 Response from Methodology Development Team | This point is covered in the Standard and therefore we removed this applicability condition. |
| Round 2 Findings | The removal of this applicability condition ensures the project proponent will not have to take on-going action to ensure continued eligibility. This item is addressed. |

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| Finding Number | 7 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | 3) Compare the GHG sources, sinks and reservoirs identified for the project with those identified in the baseline scenario, to ensure equivalency and consistency. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Methodology |
| Findings | Table 2 of the methodology includes several source/gas combinations that are not equivalent in the baseline and project scenarios. Additionally burning of woody biomass in the baseline scenario is listed as included for all gases, but for CH ₄ and N ₂ O the justification states it is conservative to exclude, which appears to the assessment team to be contradictory. |
| Round NCR/CL/OFI | 1 NCR: Please ensure equivalency of source/gases in Table 2 in line with this requirement. CL: Please clarify in line with assessor findings. |
| Round 1 Response from Methodology Development Team | Any lack of equivalency is conservative; we still retain an inconsistency where CH ₄ and N ₂ O from fire must be included in the project case but are optional in the baseline. |

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| Round 2 Findings | The assessment team acknowledges the conservative outcome of different SSRs, which is consistent with the VCS Program and other methodological reviews. This item is addressed. |
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| Finding Number | 8 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | 3.3.4 The relevant carbon pools for AFOLU project categories are aboveground tree biomass (or aboveground woody biomass, including shrubs, in ARR, ALM and ACoGS projects), aboveground non-tree biomass (aboveground non-woody biomass in ARR and ALM projects), belowground biomass, litter, dead wood, soil (including peat) and wood products. Methodologies shall include the relevant carbon pools set out in Table 2 below. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Methodology |
| Findings | Section 5.2 of the Methodology states "The carbon pools (and corresponding methodology modules) included in or excluded from the boundary of REDD project activities are shown in Table 2." However, Table 2 only shows the Sources. |
| Round NCR/CL/OFI | 1 NCR: Please update Table 2 of the Methodology to be consistent with the language of Section 5.2. |
| Round 1 Response from Methodology Development Team | A new table for carbon pools has been added for clarity. |
| Round 2 Findings | The assessment team confirmed that a new table (Table 2) has been added and describes the included carbon pools. However, the assessment team noted that aboveground non-tree biomass is noted to be "Optional" but the Justification/Explanation states that the pool must be included in the baseline. It is unclear how the pool being indicated as "Optional" is appropriate. |
| Round 2 NCR/CL/OFI | CL: Please clarify the appropriateness of aboveground non-tree biomass being listed as "Optional". |
| Round 2 Response from Methodology Development Team | This is an oversight. Clearly the pool should be included as it must be considered in the baseline. |
| Round 3 Findings | The pool has been changed from Optional to Included. This item is addressed. |

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| Finding Number | 9 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | Table 2: Carbon Pools to be considered in Methodologies |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Methodology |

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| Findings | Litter is not an included carbon pool to be considered in REDD methodologies, per Table 2. |
| Round NCR/CL/OFI | 1 NCR: Please update carbon pools to be consistent with Table 2 of the Methodology Requirements. |
| Round 1 Response from Methodology Development Team | The inclusion of litter is not inconsistent with Table 2 in the methodology requirements. For litter under REDD, the response is N. N is defined as Carbon pool does not have to be included, because it is not subject to significant changes or potential changes are transient in nature (refer to methodological requirements p19-20). The pool may be included in the project boundary because of the positive impacts of reducing or removing emissions. |
| Round 2 Findings | The Project Developer notes the nuance that 'N' in Table 2 is defined as Optional and therefore may be included |

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| Finding Number | 10 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | 2) ARR, IFM, REDD, ACoGS and WRC: GHG emissions from the removal or burning of herbaceous vegetation and collection of non-renewable wood sources for fencing of the project area. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Table 2 Methodology |
| Findings | CO ₂ , CH ₄ , and N ₂ O emissions associated with burning of woody biomass are appropriately included for both the project and baseline scenario. However, there is no reference of emissions associated with collection of non-renewable wood sources for fencing. |
| Round NCR/CL/OFI | 1 CL: Please clarify if emissions associated with collection of non-renewable wood sources for fencing is to be included in this methodology. |
| Round 1 Response from Methodology Development Team | This is considered de minimis under the <i>VCS Methodology Requirements</i> and does not need to be included explicitly in the methodology. |
| Round 2 Findings | The assessment team confirmed that this can be considered de minimis per the VCS Methodology Requirements. Item closed. |

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| Finding Number | 11 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | 3) ARR, IFM, REDD, ACoGS and WRC: Fossil fuel combustion from transport and machinery use in project activities. Where machinery use for selective harvesting activities may be significant in IFM project activities as compared to the baseline or where machinery use for earth moving activities may be significant in WRC project activities as compared to the baseline, emissions shall be accounted for if above de minimis, in accordance with this Section 3.3.6. Fossil fuel combustion from transport and machinery use in rewetting of drained peatland and conservation of peatland project activities need not be accounted for |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Table 2 Methodology |

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| Findings | CO2 emissions from fossil fuels are listed as "optional" in the baseline scenario but are listed as "included" in the project scenario. |
| Round NCR/CL/OFI 1 | CL: Please clarify how listing emissions from CO2 as optional in the baseline scenario and included in the project scenario is appropriate. |
| Round 1 Response from Methodology Development Team | It is always consistent to include emissions in the project case and to exclude in the baseline case. Will lead to a lower baseline and a higher project emission. Projects can choose to include in both cases but they have to at least make the conservative choice. However, we agree in this case fossil fuels are optional in the project case because if excluded from the baseline then may also be excluded from the project case. |
| Round 2 Findings | The updates to the methodology are sufficient to close the identified finding. Item closed. |

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| Finding Number | 12 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | 3.3.19 Where timber removal is associated with deforestation and/or degradation in the baseline scenario, the wood product pool shall be included in the project boundary because significant quantities of carbon can be stored in wood products instead of entering the atmosphere during deforestation. The quantity of live biomass going into wood products shall be quantified if above de minimis (as set out in Section 3.3.6) or may be conservatively excluded (as set out in Section 3.3.7). |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Section 5.2 Methodology |
| Findings | Section 5.2 of the methodology states: "Where the carbon pool in harvested wood products and dead wood increases more or decreases less in the baseline case than in the project case, the tool T-SIG must be used to determine whether the change is significant and, therefore, must be accounted for. In all other cases, only aboveground biomass is mandatory. Where a carbon pool is included in the baseline accounting, it must also be included in the project scenario and leakage accounting." This language is unclear and as such it is unclear to the assessment team how this criteria is satisfied. |
| Round NCR/CL/OFI 1 | CL: Please revise the referenced text to clearly indicate that this requirement is met. |
| Round 1 Response from Methodology Development Team | Text has been revised and a new table for pools added |
| Round 2 Findings | Thank you for the clarification. The assessment team determined the revisions to the methodology are sufficient to close the identified finding. |

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| Finding Number | 13 |
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| VCS Methodology Requirements v4.3 17 January 2023 (Description) | 3.3.20 Where the baseline scenario is the conversion of forest to annual crops, additional GHG credits may be available if the soil carbon pool is included because decreases in soil carbon stocks in the baseline scenario can be significant. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Section 5.2 Methodology |
| Findings | It is unclear how the methodology as currently written accounts for the scenario identified by this requirement. |
| Round NCR/CL/OFI | 1 CL: Please clarify how the methodology as written accounts for the identified scenario. |
| Round 1 Response from Methodology Development Team | The methodology requires inclusion of wetland soils and allows inclusion of non wetland soils. For non wetland soils PPs can determine whether or not to include soils based on a cost-benefit assessment |
| Round 2 Findings | Thank you for the clarification. Item closed. |

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| Finding Number | 14 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | Wetlands Restoration and Conservation (WRC) |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Section 2 REDD Methodology |
| Findings | <p>Section 2 of the REDD Methodology includes a note that states: "Note – A forthcoming update to VM0033 Methodology for Tidal Wetland and Seagrass Restoration will incorporate a jurisdictional approach to accounting for avoided unplanned and planned deforestation in tidal wetlands. Once the update to VM0033 is approved, an applicability condition will exclude tidal wetlands from this methodology. Until then, this methodology may be used with areas of tidal wetlands, the entire national extent of which must be defined as an additional jurisdiction, and soil carbon calculations, where relevant, must follow BL-TW and M-TW (VMD0050 and VMD0051)."</p> <p>It is unclear how temporary allowance of the use of this methodology is practical if it will eventually be disallowed.</p> <p>If the methodology is to temporarily allow WRC project activities, then all relevant WRC components must be met within the context of the methodology.</p> |
| Round NCR/CL/OFI | 1 CL: Please clarify the practicality/appropriateness of temporarily allowing WRC activities. If WRC activities are to be allowed in this temporarily, then please revise the methodology so that all relevant WRC Requirements are met. |

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| Round 1 Response from Methodology Development Team | For simplicity we have elected to remove the potential to temporarily use the methodology for tidal wetlands |
| Round 2 Findings | Removal of this allowance is sufficient to close the identified finding. The assessment team confirmed that the appropriate changes have been made to the methodology. Item closed. |

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| Finding Number | 15 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | 3.4.1 Methodologies using a project method shall establish criteria and procedures for identifying alternative baseline scenarios and determining the most plausible scenario, taking into account the following: |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Methodology Section 6 |
| Findings | <p>Section 6 of the Methodology states: "The most plausible baseline scenario must be determined using the relevant activity type module. For avoiding Udef, the only eligible module is MD00XX (AUDef)" As this methodology is set to incorporate all REDD project types, it is unclear how inclusion of reference to only AUDef is appropriate.</p> <p>Further as the methodology aims to provide a framework for all REDD types, it is unclear why relevant information associated with the sub requirements (i.e. 1-4) are not included within this section of the methodology.</p> |
| Round NCR/CL/OFI | 1 CL: Please clarify in line with assessor findings. |
| Round 1 Response from Methodology Development Team | Baseline scenarios are highly dependent on the activity type and therefore the specifics on determining alternative baseline scenarios and determining the most plausible baseline scenario can only be included in the specific activity module. The text has been edited to not only make reference to AUDef. |
| Round 2 Findings | <p>The assessment team notes that the methodology states the baseline scenario must be determined using the relevant activity module. The assessment team notes that the only activity module currently available is AUDef. However, the AUDef module states "Under this module, the baseline scenario is assumed to be a continuation of ongoing unplanned deforestation." It is unclear how the most plausible baseline scenario is to be determined if the AUDef module already specifies that the baseline scenario is continuation of ongoing unplanned deforestation, particularly when the additionality assessment includes an assessment of alternative land use scenarios.</p> <p>Note this is related to the same Finding for the Module (Refer to Row 84). See also Methodology Requirement 2.1.4 regarding the required comparative assessment.</p> |
| Round 2 NCR/CL/OFI | CL: Please clarify in line with assessor findings. |

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| Round 2 Response from Methodology Development Team | Sections 5.2 of the UDef module and Section 7 of the methodology have been adjusted to set out a procedure for determining the most plausible baseline scenario. |
| Round 3 Findings | Section 7 of the methodology and Section 5.2 of the Module have both been revised to ensure the steps to determine the baseline are clear and in line with other VCS rules. The assessment team read through the sections and believe the changes made are adequate for projects to determine their baseline consistently. This item is addressed. |

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| Finding Number | 16 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | 2) AUDD: The criteria and procedures for establishing the baseline scenario shall require the project proponent to take into account deforestation/degradation that would have occurred in the project area during the project crediting period. The baseline scenario shall take into account the following: |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Appendix A of AUD Module |
| Findings | The REDD methodology AUD Module relies fully on an Appendix A that describes how the Data Service Provider (Verra) will determine and provide jurisdictional data to the Project Developer in order to determine the project's allocation of activity data. In a call with Verra on 12 April 2023, it was stated that Appendix A is outside the scope of the assessor's review. As this appendix comprises the main data that will be comprising a project for determination of VCUs, the assessor requests formal confirmation from Verra that this tool is outside the scope of Aster Global's assessment. |
| Round 1 NCR/CL/OFI | 1 CL: Please provide a letter from the Director of VCS Program Methodologies confirming the scope of the Methodology Assessment does not include Appendix 1, 2, 3, 4. |
| Round 1 Response from Methodology Development Team | Aster's review should include AUDef Appendix 1 and 2, but not 3 or 4, as those are procedural |
| Round 2 Findings | This items is pending confirmation from the VCS Methodologies Director of the scope defined in the Methodology Developer's response. |
| Round 2 Response from Methodology Development Team | The VCS Methodologies Director will confirm this |
| Round 2 Response from VCS Program Methodologies Director | Appendix 3 and 4 do not need to be assessed by Aster if they are related to general procedures associated with the process for projects. They are outside the VVB scope in Section 6 of the MDRP, which covers the fundamental approach and key elements (e.g., GHG quantification, additionality, stakeholder consultation, etc). We might bring this to the program level later or publish it directly on the webpage. |
| Round 3 Findings | Per guidance from the VCS Methodology Director, evaluation of this requirement is no longer required to be met for this methodology as it pertains to Appendices 3 and 4. This item is closed as the sub-elements of this requirement have been met. Closed. |

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| Finding Number | 17 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | a) Methodologies shall set out criteria and procedures to identify where deforestation would likely occur using spatial analysis and projections (except for certain mosaic configurations as set out in Section 3.4.15(2)(c)). Such analysis shall be based on historical factors over at least the previous 10 years that explain past patterns and can be used to make future projections of deforestation. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | REDD Methodology |
| Findings | It is unclear how the methodology meets this requirement. |
| Round NCR/CL/OFI | 1 CL: Please describe how the methodology meets this requirement |
| Round 1 Response from Methodology Development Team | No correction needed. This is a methodology framework document that, together with the modules and tools it calls upon, constitutes a complete REDD methodology; it will encompass -when completed- activities that reduce emissions from unplanned deforestation (UDef), planned deforestation (PDef), and unplanned forest degradation (UDeg). The procedures to be used for analyzing and projecting the location of future deforestation, together with other methodological details that are specific for activities that reduce emissions from unplanned deforestation, are described in the companion module MD00XX. |
| Round 2 Findings | The methodology does not directly meet this requirement but depends on modules to meet this requirement. As such, the assessment team will evaluate the AUDef module against this requirement and not the Methodology. |

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| Finding Number | 18 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | b) In the frontier configuration, most of the forest area to be protected will have low rates of historical deforestation and/or degradation because most of the project area was not accessible in the past to the agents of deforestation/degradation expected to encroach during the project crediting period. Where the expansion of the deforestation frontier into the project area is linked to the development of infrastructure (e.g., roads) that does not yet exist, clear evidence shall be provided to demonstrate that such infrastructure would have been developed in the baseline scenario. Evidence may include permits, maps showing construction plans, construction contracts or open tenders, an approved budget and/or evidence that construction has started. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | REDD Methodology |
| Findings | It is unclear how the methodology meets this requirement. |
| Round NCR/CL/OFI | 1 CL: Please describe how the methodology meets this requirement |

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| Round 1 Response from Methodology Development Team | No correction needed. This is a methodology framework document that, together with the modules and tools it calls upon, constitutes a complete REDD methodology; it will encompass -when completed- activities that reduce emissions from unplanned deforestation (UDef), planned deforestation (PDef), and unplanned forest degradation (UDeg). The procedures to be used for analyzing and projecting the location of future deforestation, together with other methodological details that are specific for activities that reduce emissions from unplanned deforestation, are described in the companion module MD00XX. |
| Round 2 Findings | The methodology does not directly meet this requirement but depends on modules to meet this requirement. As such, the assessment team will evaluate the AUDef module against this requirement and not the Methodology. |

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| Finding Number | 19 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | c) The criteria and procedures for establishing the baseline scenario in the frontier and mosaic configurations shall take into account such factors as historical deforestation and/or degradation rates and require the project proponent to develop a baseline by determining and analyzing a reference area (which need not be contiguous to the project area), that shall be similar to the project area in terms of drivers and agents of deforestation and/or degradation, landscape configuration, and socio-economic and cultural conditions, noting the following. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | REDD Methodology |
| Findings | It is unclear how the methodology meets this requirement. |
| Round NCR/CL/OFI | 1 CL: Please describe how the methodology meets this requirement |
| Round 1 Response from Methodology Development Team | We will soon publish a clarification to this section of the VCS Methodology Development and Review Process, v4.3 stating that this requirement does not apply where the baseline for expected deforestation in the crediting period, or key parameters for setting the baseline, are provided by Verra. |
| Round 2 Findings | We will issue a correction that revises Section 3.4.17(2)(c) to read as follows: "The criteria and procedures for establishing the baseline scenario in the frontier and mosaic configurations shall take into account such factors as historical deforestation and/or degradation rates. The project proponent shall develop a baseline by using activity data provided to it by Verra or determining and analyzing a reference area..." |
| Round 2 Response from Methodology Development Team | The VCS Methodologies Director will confirm this |

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| Round 2 Response from VCS Program Methodologies Director | Confirmed that we will issue a Correction & Clarification document with the following amendment (draft): Methodology Requirements, Section 3.4.17(2)(c) must be read as follows: "The criteria and procedures for establishing the baseline scenario in the frontier and mosaic configurations shall take into account such factors as historical deforestation and/or degradation rates. The project proponent shall develop a baseline by using activity data provided to it by Verra or determining and analyzing a reference area..." |
| Round 3 Findings | Per guidance from the VCS Methodology Director, evaluation of this requirement is no longer required to be met for this methodology. Closed. |

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| Finding Number | 20 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | i) Where, in the mosaic configuration, no patch of forest in project areas exceeds 1,000 ha and the forest patches are surrounded by anthropogenically cleared land, or where it can be demonstrated that 25 percent or more of the perimeter of the project area is within 120 meters of land that has been anthropogenically deforested within the 10 years prior to the project start date, spatial projections to determine where in the project area deforestation is likely to occur are not required. Though not required, such spatial projections may be applied, in accordance with the methodology. Analysis of historical deforestation rates that explain past deforestation in the reference area is required and shall be applied conservatively to the project area. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | REDD Methodology |
| Findings | It is unclear how the methodology meets this requirement. |
| Round NCR/CL/OFI | 1 CL: Please describe how the methodology meets this requirement |
| Round 1 Response from Methodology Development Team | No correction needed. This is a methodology framework document that, together with the modules and tools it calls upon, constitutes a complete REDD methodology; it will encompass -when completed- activities that reduce emissions from unplanned deforestation (UDef), planned deforestation (PDef), and unplanned forest degradation (UDeg). The procedures to be used for analyzing and projecting the location of future deforestation, together with other methodological details that are specific for activities that reduce emissions from unplanned deforestation, are described in the companion module MD00XX. Module MD0XX requires such spatial analysis to be carried out in all deforestation configurations. |
| Round 2 Findings | The methodology does not directly meet this requirement but depends on modules to meet this requirement. As such, the assessment team will evaluate the AUDef module against this requirement and not the Methodology. |

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| Finding Number | 21 |
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| <p>VCS Methodology Requirements v4.3 17 January 2023 (Description)</p> | <p>The project shall not be mandated by any law, statute or other regulatory framework, or for UNFCCC non-Annex I countries, any systematically enforced law, statute or other regulatory framework. For UNFCCC non-Annex I countries, laws, statutes, regulatory frameworks or policies implemented since 11 November 2001 that give comparative advantage to less emissions-intensive technologies or activities relative to more emissions-intensive technologies or activities need not be taken into account. For all countries, laws, statutes, regulatory frameworks or policies implemented since 11 December 1997 that give comparative advantage to more emissions-intensive technologies or activities relative to less emissions intensive technologies or activities shall not be taken into account.</p> |
| <p>Evidence Used to Assess (Location in PD/MR or Supporting Documents)</p> | <p>Section 7 Methodology</p> |
| <p>Findings</p> | <p>It is unclear to the VVB where Regulatory Surplus is addressed in the referenced additionality tool (VT0001).</p> |
| <p>Round 1 NCR/CL/OFI</p> | <p>1 CL: Please clarify in line with finding.</p> |
| <p>Round 1 Response from Methodology Development Team</p> | <p>VT001 will be updated in the near future. However, you are correct at this time that the tool does not adequately capture requirements. As such we have now directly added additionality requirements (Section 7) into the methodology (very largely taken from VT001) that conform with requirements and needs for REDD projects</p> |
| <p>Round 2 Findings</p> | <p>The assessment team confirmed that methodology specific additionality requirements have been added to the methodology. Regarding regulatory surplus, the methodology now states "Project proponents must demonstrate regulatory surplus in accordance with the rules and requirements regarding regulatory surplus set out in the latest version of the VCS Methodology Requirements." It is unclear why reference is made to the VCS Methodology Requirements, while methods for determining regulatory surplus can also be found in the VCS Standard.</p> <p>Additionally, the assessment team noted that "Step 3. Common practice analysis" states "...subject to further guidance by the underlying methodology." It is unclear if this language is appropriate within a methodology that itself details the processes of demonstrating additionality.</p> |
| <p>Round 2 NCR/CL/OFI</p> | <p>CL: Please clarify the appropriateness of having Project Proponents refer to the VCS Methodology Requirements as opposed to the VCS Standard for determining regulatory surplus.</p> <p>CL: Please clarify the appropriateness of the referenced language and make any updates as appropriate.</p> |

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| Round 2 Response from Methodology Development Team | <p>Text on regulatory surplus (Step 1 of section 7 Additionality) has been edited to make reference to both the requirements set out in the <i>VCS Standard</i> and the methods described in the <i>VCS Methodology Requirements</i>, as the latter provide further guidance. The VCS Methodologies Director will confirm the appropriateness of this.</p> <p>Text in Step 3 Common practice analysis has been amended to remove the offending line.</p> |
| Round 2 Response from VCS Program Methodologies Director | <p>Confirmed for regulatory surplus. Actually, it would be enough to refer to the Methodology Requirements, which include the specific procedures/requirements. The VCS Standard only provides high-level rules, for example, the timing of assessment at validation and re-assessment at the renewal of the crediting period. This must be applied by all projects anyway, so it is not critical to include the reference in the methodology. But it can be left since it also does not hurt.</p> |
| Round 3 Findings | <p>The added text of also conforming with the VCS Standard and clarification from the Methodologies Director are sufficient to ensure these requirements are also followed by a project.</p> <p>The statement is confirmed to be removed. This item is addressed.</p> |

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| Finding Number | 22 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | <p>A1.8 Activities that stop unsanctioned deforestation and/or illegal degradation (such as removal of fuelwood or timber extracted by non-concessionaires) on lands that are legally sanctioned for timber production are eligible as REDD activities. However, activities that reduce or stop logging only, followed by protection, on forest lands legally designated or sanctioned for forestry activities are included within IFM. Projects that include both avoided unplanned deforestation and/or degradation as well as stopping sanctioned logging activities, shall follow the REDD guidelines for the unplanned deforestation and/or degradation and the IFM guidelines for the sanctioned logging activities, and shall follow the requirements set out in the VCS Program document VCS Standard.</p> |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | REDD Methodology |
| Findings | It is unclear to the VVB where there is text within the methodology that demonstrates the methodology is in compliance with these criteria. |
| Round NCR/CL/OFI | 1 CL: Please clarify in line with the finding and if necessary update the methodology document and AUD Module. |
| Round 1 Response from Methodology Development Team | Added the sentence "Activities accounted for by this methodology must meet the eligibility criteria for REDD activities in Sections A1.5-A1.9 of the VCS Methodology Requirements" to the Applicability Requirements in the Methodology. |

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| Round 2 Findings | Per the VCS Validation and Verification Manual, "Methodologies must not restate VCS requirements," and "VVBs must also ensure that methodologies are written in a manner that provides a prescriptive set of criteria and procedures that projects can apply and VVBs can audit against." The assessment team has not seen other methodologies be allowed to circumvent setting their own applicability/eligibility conditions by restating VCS Methodology Requirements. |
| Round 2 NCR/CL/OFI | CL: Please provide confirmation from the VCS Methodologies Director of the appropriateness of deferring to and restating VCS Methodology Requirements for the applicability/eligibility conditions. |
| Round 2 Response from Methodology Development Team | The VCS Methodologies Director will confirm that this is appropriate |
| Round 2 Response from VCS Program Methodologies Director | Confirmed, see my response to Finding 5 above. I confirm that it is fine to re-state the Methodology Requirements since it directly reflects the program rules and requirements and does not bear any risks. This is what we do in many methodologies, for example, for the regulatory surplus to ensure the methodologies use the latest requirements if an update is made. We will update this in the validation manual to avoid discrepancies in the future. |
| Round 3 Findings | Per the guidance from the Methodology Director, no further justification is provided from the Methodology Developer on how this requirement is met. Closed. |

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| Finding Number | 70 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | 1) Relationship to approved or pending methodologies: Assessment of whether any existing methodology may reasonably be revised to meet the objective of the proposed methodology; |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | REDD Methodology |
| Findings | The methodology as written does not provide the necessary assessment. |
| Round NCR/CL/OFI | 1 NCR: Please provide the assessment team with an assessment of whether any existing methodologies could have been reasonably revised to meet the objective of the proposed methodology. |
| Round 1 Response from Methodology Development Team | VCS Methodologies Director will confirm that he instructed the meth development team not to include this section |

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| Round 2 Findings | <p>In both the Methodology Development and Review Process (6.1.3.1) and the Assessment Report template (3.1), the assessor is required to fully vet this requirement. This is a requirement of Verra that has been imposed on all past methodologies, and omitting this section would not be consistent with the VCS Program.</p> <p>This item is pending confirmation from Verra/developer that this requirement is not relevant to the development of this methodology and that the developer was instructed not to include this section as indicated by the Round 1 Response.</p> |
| Round 2 NCR/CL/OFI | OFI: Although the team was instructed to omit this section, the assessor believes adding it would bring consistency to the methodology assessment process. |
| Round 2 Response from Methodology Development Team | The VCS Methodologies Director will confirm that this is appropriate. It is not included in the published version of the methodology. |
| Round 2 Response from VCS Program Methodologies Director | I confirm that the relationship to other methodologies does not need to be included anymore. We deleted this from the latest methodology template. We assess this now at earlier stages to ensure there are no overlapping methodologies. There is an error in the MDRP under section 6, where this is still included in the VVB scope, point 1. We will issue a correction document. |
| Round 3 Findings | Guidance from the Methodology Director states the relationship to preexisting methodologies does not need to be assessed within the Methodology document. Closed on account of direct guidance from the Director of Methodologies. |

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| Finding Number | 71 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | TITLE PAGE: Complete all items in the box on the title page using Arial or Century Gothic 10.5 point, black, regular (non-italic) font. This box must appear on the title page of the final document. Methodologies may also feature the project title and preparers' name, logo and contact information more prominently on the title page, using the format below (Arial or Century Gothic 24 point and Arial or Century Gothic 12 point, black, regular font). |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Title Page Methodology |
| Findings | The formatting as defined by this requirement is not adhered to in full. The text sizes for the referenced sections are incorrect. |
| Round NCR/CL/OFI | 1 NCR: Please update the formatting on the title page to align with the criteria of this requirement. |
| Round 1 Response from Methodology Development Team | The template should say Franklin Book instead of 10.5 - this is an error in the template |
| Round 2 Findings | The assessment team reviewed the fonts used in the methodology template and confirmed that they are "10.5" rather than "12" as listed in the requirement. Item closed. |

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| Finding Number | 72 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | The methodology must use key words “must,” “should,” and “may” appropriately. Consistent with best practice, “must” is to be used to indicate a firm requirement, “should” is to be used to indicate a (non-mandatory) recommendation, and “may” is to be used to indicate a permissible or allowable option. The term “shall” is reserved for VCS Program documents and is generally not appropriate for methodologies. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Methodology |
| Findings | Key words "must", "should", and "may" appear to be used appropriately throughout the body of the methodology. However, the assessment team notes that the term "shall" is used in the methodology. |
| Round 1 NCR/CL/OFI | 1 CL: Please clarify how use of the term "shall" is appropriate in the context of this methodology. If this cannot be done, please revise the any language utilizing the term "shall." |
| Round 1 Response from Methodology Development Team | "Shall" has been removed from the methodology. |
| Round 2 Findings | The assessment team confirmed that the instances of "shall" initially identified have been removed from the methodology. However, new text added in response to other findings now include multiple instances of the word "shall." |
| Round 2 NCR/CL/OFI | CL: Please clarify how use of the term "shall" is appropriate in the context of this methodology. If this cannot be done, please revise any language utilizing the term "shall." |
| Round 2 Response from Methodology Development Team | The text of the methodology was thoroughly revised; instances of undue use of the term "shall" were corrected. |
| Round 3 Findings | Some instances of "shall" in Appendix 1 under Equation A.1 still exist. Also, Appendix 3, under Section A4.3 still contains the usage of "shall", although that's technically outside our assessment scope. Also, it is unclear if Appendix 1 will be changed to Appendix A, as the Equation number suggests, or will the equations be re-numbered? |
| Round 3 NCR/CL/OFI | CL: Please see the Findings and clarify the items. |
| Round 3 Response from Methodology Development Team | Instances of "shall" have been replaced by "must". The equation in Appendix 1 has been renumbered (2) (following the sequence of the body of the methodology). |
| Round 4 Findings | These changes have been confirmed in v 0.7b. Closed. |

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| Finding Number | 73 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | Unless applying a merited deviation, please complete all sections using Arial or Franklin Gothic Book 10.5 point, black, regular (non-italic) font. Where a section is not applicable, explain why the section is not applicable (i.e., do not delete the section from the final document and do not only write “not applicable”). |

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| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Methodology |
| Findings | The appropriate font is applied, and all sections are completed (i.e. no sections are listed as N/A). However, the assessment team identified sections with text colors other than black (e.g. in Eq 57's where section). |
| Round NCR/CL/OFI | 1 CL: Please ensure all sections use Arial or Franklin Gothic Book 10.5 point, black, regular (non-italic) font |
| Round 1 Response from Methodology Development Team | The template should say Franklin Book instead of 10.5 - this is an error in the template; this finding has been addressed throughout the document |
| Round 2 Findings | The assessment team reviewed the fonts used in the methodology template and confirmed that they are "10.5" rather than "12" as listed in the requirement. Item closed. |

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| Finding Number | 74 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | Provide a brief summary description of the methodology, including a description of the project activity(s) to which the methodology applies. The summary should be kept concise. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Section 2 Methodology |
| Findings | <p>A summary description of the methodology is provided and is relatively concise.</p> <p>Section 2 of the methodology states: "Project proponents may choose to apply other approved VCS methodologies to activities in this same project to account for emission reductions and removals from project activities not currently covered by this methodology (e.g., for avoiding planned forest degradation, see the improved forest management category of methodologies). See the VCS Standard for more detail on applying more than one methodology per project."</p> <p>This language is somewhat confusing, and it is unclear why it is included if it ultimately refers the reader to the VCS Standard.</p> <p>Table 1 provides context on inclusion of which tools/modules to be used. The AFOLU Non-Permanence Risk Tool is included, but is seemingly referenced in the module as T-BAR. It is unclear how this is appropriate, as this acronym is undefined anywhere in the methodology or module.</p> |
| Round NCR/CL/OFI | 1 CL: Please clarify in line with assessor findings. |
| Round 1 Response from Methodology Development Team | T-BAR acronym in the Module document was replaced by "VCS AFOLU Non-Permanence Risk Tool" |

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| Round 2 Findings | <p>The assessment team confirmed that the language identified has been removed from the methodology. Item closed.</p> <p>The assessment team confirmed that that the referenced acronym has been replaced. Item closed.</p> |
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| Finding Number | 75 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | Using the format in the example below, provide, in alphabetical order, definitions of key terms and acronyms that are used in the methodology. Ensure all defined terms are used in the methodology. Do not include terms already defined under the VCS Program. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Section 3 REDD Methodology |
| Findings | <p>1. The assessment team reviewed the definitions provided in Section 3 of the REDD Methodology and noted that several key terms and acronyms used in the body of the methodology are not defined. While not an exhaustive list, the assessment team noted the "baseline validity period", "baseline activity data" and "historical reference period" are not defined in Section 3.</p> <p>2. The VVB reviewed the definition of forest and it appears to be more restrictive than the definition of forest defined by the VCS Program. It is unclear how this appropriate.</p> |
| Round NCR/CL/OFI | <p>1 NCR: Please ensure all key terms and acronyms are defined in Section 3 of the Methodology.</p> <p>CL: Please clarify in line with Finding 2.</p> |
| Round 1 Response from Methodology Development Team | <p>NCR: The definitions of "activity data" and "baseline validity period" have been moved to M0184 from AUDef. We would appreciate suggestions of other key terms that are important to include in Section 3.</p> <p>CL: The more restrictive definition of forest simply narrows the scope of this methodology. Use of a more restrictive definition has been approved by the VCS Methodologies team.</p> |
| Round 2 Findings | <p>The assessment team confirmed that the identified key terms have been included in the methodology. The assessment team did not identify any additional key terms to be included in the methodology. Item closed.</p> <p>The assessment team acknowledges that the more restrictive definition of forest narrows the scope of the methodology. However, the assessment team is requesting verifiable evidence that the more restrictive definition has been approved by the VCS methodologies team as suggested by the response. This item is pending this approval.</p> |
| Round 2 Response from Methodology Development Team | The VCS Methodologies Director will confirm this |

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| Round 2 Response from VCS Program Methodologies Director | I confirm that it is fine to use the term "forest" if it is narrower/more restrictive. However, the language in the methodology must be clear to ensure that the definition in the methodology is applied and cannot be interpreted to be overwritten by the broader VCS Program definition by project proponents. |
| Round 3 Findings | The assessment team notes guidance from the VCS Methodologies Director permits a definition of forest that is narrower than the VCS definition, provided it does not overwrite the VCS definition of forest. The Assessment Team finds this condition is met and therefore closes the finding. |

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| Finding Number | 76 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | Describe the project boundary and identify the GHG sources, sinks and reservoirs (controlled by the project proponent, related to the project or affected by the project) included in or excluded from the project boundary. Specify where GHG sources, sinks and reservoirs are optional. Include any procedures and/or diagrams, as appropriate. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Section 5 Methodology |
| Findings | It is unclear why CO ₂ Combustion of fossil fuels is 'included' for the project but may be excluded when excluded from the baseline. It is unclear why CH ₄ and N ₂ O state the sources are included from burning of woody biomass but the justification states it is conservative to exclude. |
| Round NCR/CL/OFI | 1 CL: Please clarify in line with finding |
| Round 1 Response from Methodology Development Team | CO ₂ combustion from fossil fuels now listed as optional for both baseline and project case. May be excluded if de minimis. For CH ₄ and N ₂ O from burning now is optional in the baseline - it is conservative to exclude; but in the project case must be included where fires occur |
| Round 2 Findings | In v0.3 Table 3, the "Included?" column is now consistent with the Justification column. This item is closed. |

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| Finding Number | 77 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | Where an additionality tool is referenced, it must be stated that the latest version of the tool must be used. The methodology may also include additional requirements, procedures and/or guidance to augment the tool and ensure it is applied appropriately within the context of the methodology. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Section 7 Methodology |
| Findings | VT0001 is referenced for demonstration of additionality. However, no version of the tool is provided, and thus it is unclear how this requirement is met. |

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| Round NCR/CL/OFI | 1 | CL: Please make the necessary changes to the methodology to satisfy this requirement. |
| Round 1 Response from Methodology Development Team | | The most recent version of the tool is now referenced |
| Round 2 Findings | | The methodology has been updated to no longer reference an additional tool. As such this finding is no longer applicable. Item closed. |

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| Finding Number | | 78 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | | Describe the procedure for quantifying net GHG emission reductions and/or removals, as a function of baseline emissions, project emissions and leakage. Follow the instructions for equations provided in Section 8.1 (Baseline Emissions) above. Where relevant, include equations for estimating uncertainty. |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | | Section 8.4.1 of Methodology |
| Findings | | <p>Section 8.4 states the project proponent must present conservative ex ante estimations and then refers to the parameter tables in appropriate modules to source these values. It is unclear if all the necessary information to present conservative ex ante estimations can be found within the referenced parameters, as opposed to the body of the referenced module.</p> <p>A single equation is used to calculate VCU from multiple REDD activities. However, as the modules that produce these equations have yet to be created, it is unclear how the assessment team is to assess their appropriateness.</p> <p>For the module that has been created and is currently being assessed (AUDef) the resultant parameter from application of the module is defined as VCUUdef. However, in the module, the parameter is identified as VCUAUdef.</p> <p>Section 8.4.1 includes the following statement "to estimate the number of Verified Carbon Units (VCUs)..." It is unclear why the term "estimate" is used as this appears to be a calculated value of the total VCUs.</p> |
| Round NCR/CL/OFI | 1 | CL: Please clarify in line with assessor findings. |

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| Round 1 Response from Methodology Development Team | <p>Refer to the relevant accounting modules and the parameter tables within these modules for instructions on ex ante estimations of specific parameters.</p> <p>The summed VCU equation gives the parameters that will be output from the upcoming additional accounting modules, no appropriateness check is necessary or possible at this time.</p> <p>Parameter updated to VCUAUDef.</p> <p>Text changed to read to calculate instead of estimate</p> |
| Round 2 Findings | <p>The assessment team determined that information in the parameter tables sufficiently describes processes for ex ante estimation. Item closed.</p> <p>The assessment team determined that the response provided adequately addresses the initial finding. Item closed.</p> <p>The assessment team confirmed the parameter has been appropriately. Item closed.</p> <p>The assessment team confirmed the referenced changes have been made to the methodology. Item closed.</p> |

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| Finding Number | 79 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | 9.1 Data and Parameters Available at Validation |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Methodology Section 9.1 |
| Findings | Section 9.1 states "See specific parameters within accounting and other source modules." While the assessment team understands that parameters are defined in other modules and thus do not need to be included in the methodology itself, the language used is somewhat confusing. Further, the language used does not specifically state that the parameters are defined in other modules, but rather instructs the reader to "see" specific parameters. |
| Round NCR/CL/OFI | 1 CL: Please update the language in this section to clearly convey that relevant parameters are calculated in other modules. |
| Round 1 Response from Methodology Development Team | Text now states "Relevant parameters are detailed within accounting and other source modules." |
| Round 2 Findings | The changes to the methodology are sufficient to close the identified finding. Item closed. |

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| Finding Number | 80 |
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| VCS Methodology Requirements v4.3 17 January 2023 (Description) | 9.2 Data and Parameters Monitored |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Methodology section 9.2 |
| Findings | Section 9.2 states "See specific parameters within accounting and other source modules." While the assessment team understands that parameters are defined in other modules and thus do not need to be included in the methodology itself, the language used is somewhat confusing. Further, the language used does not specifically state that the parameters are defined in other modules, but rather instructs the reader to "see" specific parameters. |
| Round NCR/CL/OFI 1 | CL: Please update the language in this section to clearly convey that relevant parameters are calculated in other modules. |
| Round 1 Response from Methodology Development Team | Text now states "Relevant parameters are detailed within accounting and other source modules." |
| Round 2 Findings | The changes to the methodology are sufficient to close the identified finding. Item closed. |

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| Finding Number | 81 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | <i>Include any references relevant to the methodology.</i> |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | Section 10 REDD Methodology |
| Findings | <p>The 2019 IPCC refinement is mentioned in the body of the methodology, but not included in Section 10.</p> <p>In the body of the methodology, reference is made to the "IPCC 2006 Good Practice Guidance". It is unclear if this is supposed to refer to the IPCC 2003 Good Practice Guidance or the 2006 Guidelines for National GHG Inventories.</p> <p>Section 10 includes the text "Additional information may be found in the modules referenced throughout this methodology." It is unclear if the inclusion of this statement in the references section is necessary or appropriate.</p> |
| Round NCR/CL/OFI 1 | <p>CL: Please ensure all references are appropriately defined and referenced in the reference section and throughout the methodology.</p> <p>OFI: Please consider removing / revising the referenced sentence.</p> |

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| Round 1 Response from Methodology Development Team | The 2019 Refinement was added to the list of REFERENCES References to the IPCC guidance were corrected Sentence pointing out to additional references in the modules was revised |
| Round 2 Findings | The changes to the methodology are sufficient to close the identified finding. Item closed. |

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| Finding Number | 212 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | REDD Methodology 2 Summary Description of the Methodology |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | REDD Section 2 |
| Findings | Section of the Methodology states "In future iterations, additional modules will be added to address activities that reduce emissions from planned deforestation (PDef) and unplanned forest degradation." It is unclear based on this language if the methodology developer intends to update the methodology upon release of the referenced modules. |
| Round NCR/CL/OFI 1 | CL: Please clarify if the methodology will be updated when associated modules are released. |
| Round 1 Response from Methodology Development Team | Yes, the methodology will be updated when the referenced modules are released. |
| Round 2 Findings | Thank you for the clarification. As the overarching methodology is a framework encompassing multiple modules, updating the methodology upon release of modules is reasonable. |

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| Finding Number | 213 |
| VCS Methodology Requirements v4.3 17 January 2023 (Description) | REDD Methodology 6 Baseline Scenario |
| Evidence Used to Assess (Location in PD/MR or Supporting Documents) | REDD Section 6 |

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| <p>Findings</p> | <p>Section 6 states that the most plausible baseline scenario must be determined using the relevant activity type module. For avoiding UDef, the only eligible module is MD00XX (AUDef). While other relevant modules have yet to be released, the way this is worded may be interpreted that there are no other eligible modules.</p> <p>Section 6 states "Projects that are implemented within a JNR registered REDD program shall nest according to the requirements set out by the VCS-JNR Program." However, the UDef module includes an applicability condition that states projects located in a jurisdiction with a JNR program are ineligible. It is unclear why the sentence in the methodology is included as it appears to contrast with the applicability condition in the module. Similarly, the sentence beginning with "If the baseline..." presents a similar issue.</p> <p>Section 6 states "REDD projects that are implemented within a non-JNR REDD jurisdictional program should follow the relevant jurisdictional program's requirements, but they must be registered and monitored under VCS following this methodology." In an instance where the jurisdictional program's requirements conflict with the requirements of the methodology, it is unclear which would take precedence, based on the language as written.</p> <p>Section 6 states "baseline projections beyond the baseline validity period are not required for REDD project activities." Baseline validity period is not defined within the methodology.</p> <p>It is unclear if UDef baseline reassessments are subject solely to the requirements, or also to the requirements of the VCS Standard.</p> |
| <p>Round NCR/CL/OFI</p> | <p>1</p> <p>OFI: Please consider rephrasing the referenced section to more clearly describe that future modules will be developed for other activity types.</p> <p>CL: Please clarify the appropriateness of the referenced sentence as it appears to contradict applicability conditions identified in the module.</p> <p>CL: Please clarify in line with the identified situation in the finding.</p> <p>CL: Please define baseline validity period.</p> <p>CL: Please clarify if baseline reassessments for UDef projects are also subject to the requirements of the VCS Standard.</p> |

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| Round 1 Response from Methodology Development Team | <p>OFI: We changed "module" to "module(s)"</p> <p>CL 1: Corrected these sections to indicate that the methodology may be used in the context of a JNR program</p> <p>CL 2: Clarified that further clarification is included in the individual module(s)</p> <p>CL 3: Baseline validity period is defined</p> <p>CL 4: The methodology isn't specific to UDef, so the statement "The project baseline must be reassessed per the VCS Standard and the requirement in the relevant module" is correct.</p> |
| Round 2 Findings | <p>OFI: The methodology developer has chosen to respond to the OFI. While not required, the assessment team determined the referenced changes have been made.</p> <p>CL1: The assessment team confirmed the referenced changes have been made and are sufficient to close the identified finding. Item closed.</p> <p>CL2: The assessment team confirmed that the methodology now refers to the respective modules for more information on nesting. This information is included in AUDef. Item closed.</p> <p>CL3: The assessment team confirmed that a definition for BVP is now included. BVP is defined as "The period of time a baseline is considered valid, as set out in the VCS Standard." However it is unclear if this definition is appropriate in all scenarios, particularly pertaining to the initial baseline validity period as detailed in Section 8.1.1</p> <p>CL4: Thank you for the clarification, this item is closed.</p> |
| Round 2 NCR/CL/OFI | <p>CL: Please clarify/provide additional information regarding how the definition for BVP is appropriate in all scenarios.</p> |
| Round 2 Response from Methodology Development Team | <p>The scenarios considered in section 8.1.1 refer only to the initial baseline of a project starting implementation in a jurisdiction where a previously set jurisdictional baseline validity period exists. Under such circumstances, the project's first baseline validity period will not comply with the VCS definition, but this discrepancy will occur only during the initial validity period; the provisions included in section 8.1.1 ensure that subsequent validity periods will.</p> |
| Round 3 Findings | <p>The assessment team understands that the discrepancy will only exist during the initial BVP. However, it is unclear how inclusion of a definition that cannot be considered universally met within the methodology is appropriate.</p> |
| Round 3 NCR/CL/OFI | <p>CL: Please clarify in line with the findings, and if necessary update the definition.</p> |

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| <p>Round 3 Response from Methodology Development Team</p> | <p>This is a fact of how baseline validity periods work with the jurisdictional allocation approach. The <i>VCS Standard</i> will be updated to enable this exception.</p> <p>A draft of the correction and clarification document will be provided to the methodology assessor. Section 3.2.5 of the <i>Standard</i> will be updated to end in a new sentence stating "For Avoiding Unplanned Deforestation projects where the baseline is allocated from a jurisdictional level, the initial baseline reassessment may happen at one year but shall occur no more than seven years. The second baseline period shall be no more than six years." Language will be added to exclude these cases from the paragraph above. The clarification will be issued with the methodology.</p> |
| <p>Round 4 Findings</p> | <p>Verra has provided clarification by acknowledging that projects with a gap between their start date and the HRP will be considered an exception with the jurisdictional allocation approach and addressed in the forthcoming methodology requirement update. Verra further states a draft of the correction and clarification document will be provided to the methodology assessor. Verra stated the following clarification will be added in section 3.4.17(2) "Where methodologies use a jurisdictional allocation approach, projects may not have a historical reference period that immediately precedes the start of the baseline validity period." With the upcoming revision in the methodology requirements, the assessment team verifies that this matter has been taken into account.</p> |

APPENDIX C: PUBLIC COMMENTS ASSESSMENT

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| Comment # | 1 |
| Question | 1 |
| Section | General |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Reviewer Country | Zambia |
| Response(s) - including general questions & comments | Yes, we feel the AUDD methodology application process would be simplified and more efficient if project proponents were permitted to apply and validate all the modules themselves. In many cases project proponents have done a large amount of preparatory work, in assessing the feasibility or potential projects, and this local knowledge and data would enable better application of the modules. In addition, local project proponents are likely to have existing ties with national stakeholders, and could help to incorporate national strategies more effectively into baseline design. |
| Verra Response | The purpose of this process is to ensure harmonizing and comparability of key results such as activity data. It is therefore not envisioned that projects will apply these parts of the module but there is ample opportunity for projects to apply or submit for consideration their project level data or work with local governments to supply data or register JNR programs. |
| Aster Global Assessment | The commenter raises an interesting issue, namely that feasibility assessments of projects will not be able to be accomplished without first paying for an AD allocation report. |
| Aster Global Initial Findings | CL: Please address how the use of DSPs to develop baseline data products will impact the assessment of project feasibility |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The purpose of this process is to ensure harmonizing and comparability of key results such as activity data. It is therefore not envisioned that projects will apply these parts of the module but there is ample opportunity for projects to apply or submit for consideration their project level data or work with local governments to supply data or register JNR programs.</p> <p>Because all of the modules and tools will be public, project developers will be able to approximate a plausible range of baseline AD allocation based on simulation of the development of jurisdictional datasets. We have already seen project developers undergo this feasibility work in a cost effective manner. It will not produce 100% agreement with the final official allocated AD, but there are numerous sources of risk in the financial projections of a carbon project, and Verra does not believe there should be an expectation that projects have 100% guarantee of baseline AD, when a close approximation is readily achievable. Furthermore, once AD allocation is calculated for a project, it is set for six years, giving projects six years of assurances in developing financial models.</p> <p>Explanation of original Verra Response: Verra's original response correctly cited avenues that project developers have for</p> |

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| | <p>providing data to the 3rd party data developers. However, the updated response has been focused more clearly on the issue of feasibility.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster's initial response is in/out of scope for VVB review | in scope |
| Aster Global Findings Round 2 | The methodology developer's revised response provides additional considerations regarding feasibility assessments. The assessment team determined that this revised response has taken due account of the comment. Item closed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates only |
| Revised Verra Response October 2023 | <p>The purpose of this process is to ensure harmonizing and comparability of key results such as activity data. It is therefore not envisioned that projects will apply Annex 1, jurisdictional activity data collection, risk mapping and allocation, but there is ample opportunity for projects to apply or submit for consideration their project level data or work with local governments to supply data or register JNR programs.</p> <p>Because the methodology all of the modules and tools will be public, project developers will be able to approximate a plausible range of baseline AD allocation based on simulation of the development of jurisdictional datasets. We have already seen project developers undergo this feasibility work in a cost effective manner. It will not produce 100% agreement with the final official allocated AD, but there are numerous sources of risk in the financial projections of a carbon project, and Verra does not believe there should be an expectation that projects have 100% guarantee of baseline AD, when a close approximation is readily achievable. Furthermore, once jurisdictional AD, forest cover benchmark maps (FCBMs) and risk maps are established, they will last allocation is calculated for a project, it is set for six years, giving projects six years of assurances in developing financial models.</p> <p>Third-party validation is required for all projects in the VCS Program.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 2 |
| Question | General |
| Section | AUD Methodology Application Guide v1.0 |
| Page (if relevant) | 6 |
| Line (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Reviewer Country | Zambia |
| Response(s) - including general | There is no indication of what will happen if there is a JNR FREL in place, but not one that is registered with Verra. Also there is no timeline for this process. |

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| questions & comments | |
| Verra Response | Data service providers should analyze existing FRELs to ascertain whether they do or could, with minor changes and/or discounting, meet Verra requirements to be used for this methodology. If they cannot, Verra will produce the data for projects and if/when a country registers the FREL in a JNR Program in the future, projects would be transitioned. This is implied in the preference for government data in the RFP for AD. |
| Aster Global Assessment | It is unclear, based on Verra's response, and Table 17 in appendix 4, if DSPs, should, may, or must use FRELs not registered with Verra. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Data service providers should analyze existing FRELs to ascertain whether activity data used to construct them could, with minor changes and/or discounting, meet Verra requirements to be used for this methodology. If they cannot, Verra will produce the data for projects and if/when a country registers the FREL in a JNR Program in the future, projects would be transitioned. This is implied in the preference for government data in the RFP for AD. FRELs are denominated in tons of CO2 equivalent per year. There is no use of a jurisdictional reference level in the AUDef module. The AUDef module requires a jurisdictional projection of activity data. Activity data that was used to develop a jurisdictional FREL could be re-used to meet the requirements of the AUDef methodology, and enable maximal harmonization with jurisdictional accounting.</p> <p>Explanation of original Verra Response: Verra's original response is accurate. However, it is further clarified that it is not the FREL that should be analyzed against AUDef module's requirements, but rather data used to construct the FREL.</p> <p>Response to additional points raised by Aster: The only reference to FRELs in appendix 4 is associated with activity data development: 'Sample plot observations representative of the jurisdiction, including those developed for national FREL '. The passage is about use of data used to construct the FREL, not the FREL itself (which would be denominated in tCO2e y-1 and thus has no role in this module).</p> |
| Aster Global Findings Round 2 | The methodology developer's revised response provides additional considerations. The assessment team determined that this revised response has taken due account of the comment. Item closed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | significant changes |
| Revised Verra Response October 2023 | <p>A note has been added to Section 2 of <i>AUDef</i> stating that where a project is to be nested in a registered Jurisdictional and Nested REDD+ (JNR) Scenario 1 or 2 program, the jurisdictional proponent is responsible for generating and allocating the project this information.</p> <p>An indicative timeline has been added in <i>AUDef</i> Appendix 3.</p> <p>Data service providers should analyze existing FRELs to ascertain whether activity data used to construct them could, with minor changes and/or discounting, meet Verra requirements to be used for this methodology. If they cannot, Verra will produce the data for projects and if/when a country registers the FREL in a JNR Program in the</p> |

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| | <p>future, projects would be transitioned. This is implied in the preference for government data in the RFP for AD.</p> <p>FRELS are denominated in tons of CO₂ equivalent per year. There is no use of a jurisdictional reference level in the AUDef module. The AUDef module requires a jurisdictional projection of activity data. Activity data that was used to develop a jurisdictional FREL could be re-used to meet the requirements of the AUDef methodology, and enable maximal harmonization with jurisdictional accounting.</p> |
| Aster Global Assessment of Revised Response | The assessment team notes that significant changes were made in the revised response. However, these changes do not affect the assessment team's initial review and thus no further review is warranted. |
| Comment # | 3 |
| Question | General |
| Section | AUD Methodology Application Guide v1.0 |
| Page (if relevant) | 7 |
| Line (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Reviewer Country | Zambia |
| Response(s) - including general questions & comments | There are no details about the cost of AD generation and allocation fees, or who will be responsible to pay them if two separate PPs apply for the same area at the same time. |
| Verra Response | This is being developed and will be communicated. |
| Aster Global Assessment | The methodology developer responded to the commenters question regarding payments on AD generation and allocation fees by stating that details on this process are being developed. It is unclear when these details will be developed and communicated. As all projects will be required to transition to the new methodology in the near future, the assessment team believes that the future costs should be communicated to project proponents as soon as possible. |
| Aster Global Initial Findings | CL: Please clarify when guidance on the cost of AD generation and allocation fees will be published and how it will be distributed to appropriate stakeholders. |
| Round 1 Response from Methodology Developer | Fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects. This will be published (in summary or in full) at the time the methodology is released. |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | <p>Verra has elaborated that fee structure is yet to be determined. As such, Verra has not directly addressed the public comment. However, Verra has stated this public comment is out of scope with the assessment of the Methodology and AUDef module.</p> <p>The Assessment Team acknowledges fees related to AD allocation reports relate to</p> |

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| | programmatic decision making within Verra and are outside the scope of the Assessment. |
| Status | closed R3 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects. This will be published (in summary or in full) at the time the methodology is released. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 4 |
| Question | General |
| Section | AUD Methodology Application Guide v1.0 |
| Page (if relevant) | 9 |
| Line (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Reviewer Country | Zambia |
| Response(s) - including general questions & comments | How will baseline allocation requests be treated for new instances in grouped projects? If a new instance is added during a monitoring period will the PP be expected to contract a VVB to validate the boundaries of the new instance before allocation, or can this be done at verification of that MR? Will grouped projects be limited to one jurisdiction or can they span more than one? |
| Verra Response | <p>The project will need to request AD from Verra before adding any new project areas, but the new project areas can be added to the project following the same procedures as for any other project.</p> <p>Grouped projects are not limited to one jurisdiction. If they span two jurisdictions and AD has not been developed for project activity instances to be added to a project in a new-to-Verra jurisdictions, Verra will need to collect and allocate AD for the new jurisdiction.</p> |
| Aster Global Assessment | <p>Verra has stated that new instances will need additional AD requests. This is in line with Appendix A 3.3.1, "Where the boundaries of the project area are altered during the validation or the registration process (e.g., as a result of a VVB corrective action request, or as a result of Verra's accuracy review), the project proponent must request a new AD baseline allocation using the corrected project area."</p> <p>however, this raises a question from the assessment team--If a project's boundaries change due to a VVB corrective action request, will the new AD allocation request require a second fee?</p> |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from | Revised Verra comment addressing original public comment: The fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction |

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| Methodology Developer | <p>and in a way that does not burden projects. The fee structure will clarify cost implications of adding or editing instances of grouped projects.</p> <p>Explanation of original Verra response: Verra affirms response but adds detail.</p> <p>Response to additional questions raised by Aster: Boundary changes that are not due to project proponent error will not require payment of a second fee.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | <p>Verra has elaborated that fee structure is yet to be determined. As such, Verra has not directly addressed the public comment. However, Verra has stated this public comment is out of scope with the assessment of the Methodology and AUDef module.</p> <p>The Assessment Team acknowledges fees related to AD allocation reports relate to programmatic decision making within Verra and are outside the scope of the Assessment.</p> <p>Sufficient clarification was provided to close the finding pertaining to a second fee.</p> |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects. The fee structure will clarify cost implications of adding or editing instances of grouped projects. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 5 |
| Question | General |
| Section | AUD Methodology Application Guide v1.0 |
| Page (if relevant) | 9 |
| Line (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Reviewer Country | Zambia |
| Response(s) - including general questions & comments | Will new templates be released for the PDD? |
| Verra Response | VCS project description templates will not need to be altered due to this new methodology. |

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| Aster Global Assessment | The methodology developer clarified that VCS PD description templates will not need to be altered due to the new methodology, thus addressing the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | VCS project description templates will not need to be altered due to this new methodology. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 6 |
| Question | 1 |
| Section | General |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Biofilica Ambipar Environment & NBS Brazil Alliance |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | <p>One of the most sensible stages of the REDD+ project development is the definition of the Reference Region, as its choice is relatively subjective and has a major impact in the baseline emission estimates. Allowing for the reference region to be based on jurisdictional bounds enclosing the project reduces subjectivity and improves the application process, but only if project proponents can choose the most appropriate jurisdictional level, considering the distribution of deforestation drivers and agents, and project size.</p> <p>Having the entire baseline provided by Verra can greatly simplify the application process, but at least for the Amazon region, the following questions arise:</p> <ul style="list-style-type: none"> - Will Verra be able to provide baseline and risk maps for new projects timely? - Will projects be able to propose more adequate jurisdictional levels (e.g.: Municipalities instead of States; or including neighboring Municipalities) based on their knowledge of the project's region? Will Verra allow for the possibility of multiple baselines for multiple jurisdictional levels? - Will Verra make jurisdictional risk maps available at all times, so that project proponents can evaluate projects prospectively? - How the project jurisdictional level will be selected if a project area or leakage belt encompasses two or more smaller-scale jurisdictions (small scale projects). |
| Verra Response | <ul style="list-style-type: none"> - We hope to have data available for all jurisdictions where there are current VCS AUDD projects before the end of 2024 - Jurisdiction boundaries are determined by Verra; however, we have and will consult with project proponents before setting such boundaries. - Maps will be publicly available once developed - Data would be developed for multiple jurisdictions and projects would receive allocations from these separate jurisdictions |
| Aster Global Assessment | Several commenters have also inquired about the timeliness of baseline data. Verra has stated they will be timely several times; to assuage concerns from project developers, the Assessment Team would like Verra to detail how this will be |

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| | <p>accomplished.</p> <p>Several commenters have also asked if stakeholders other than govts will inform the delineation of jurisdictions; to better address these comments, the assessment team asks Verra to explain how it may be inappropriate or unwarranted to have feedback from stakeholders other than govts.</p> |
| Aster Global Initial Findings | CL: Please elaborate on Verra's response to this comment, in line with the finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <ul style="list-style-type: none"> - We hope to have data available for all jurisdictions where there are current VCS AUDD projects before the end of 2024. Once the first round of allocations are complete, Verra will draft and implement a plan for how these will be updated in a timely manner. We are looking to find efficiencies wherever possible, e.g., by using multiple data service providers and engaging directly with the government as appropriate. - Jurisdiction boundaries are determined by Verra; for a significant majority of countries the jurisdiction will be the national boundaries. As an example, in the first set of countries only DRC and Brazil include subnational jurisdictions, while Colombia, Kenya, Tanzania, Zambia, Zimbabwe and Cambodia are national. For any jurisdiction with unclear boundaries, Verra will seek review from the national government. Appendix 4 describes the ways in which stakeholders may provide input into the development of data products, and makes clear that governments and other stakeholders may provide recommendations on the proposed boundaries. It is identified in table 18 that it is Verra's responsibility to make a final determination. Verra has made this choice to minimize the perception that project proponents may be influencing the definition of the jurisdiction to game results in their favor. - Maps will be publicly available once developed - Data would be developed for multiple jurisdictions and projects would receive allocations from these separate jurisdictions. Updates will only be needed every 6 years. <p>Explanation of original Verra response: We're just now going through the process for the first time, so we can't say more about how timely the process is going to be at present; however, we elaborated a bit more on this in the first bullet above.</p> <p>We also elaborated further on the need for Verra to take the final decision on jurisdictional boundaries.</p> |
| Aster Global Findings Round 2 | The methodology developer's revised response provides additional considerations. The assessment team determined that this revised response has taken due account of the comment. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates only |
| Revised Verra Response October 2023 | <ul style="list-style-type: none"> - We hope to have data available for all jurisdictions where there are current VCS AUDD projects before the end of 2024. Once the first round of allocations are complete, Verra will draft and implement a plan for how these will be updated in a timely manner. We are looking to find efficiencies wherever possible, e.g., by using multiple data service providers and engaging directly with the government as appropriate. - Jurisdiction boundaries are determined by Verra; for a significant majority of countries the jurisdiction will be the national boundaries. As an example, in the first set of countries only DRC and Brazil include subnational jurisdictions, while Colombia, Kenya, Tanzania, Zambia, Zimbabwe and Cambodia are national. For any jurisdiction |

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| | <p>with unclear boundaries, Verra will seek review from the national government. <i>AUDef</i> Appendix 4 describes the ways in which stakeholders may provide input into the development of data products, and makes clear that governments and other stakeholders may provide recommendations on the proposed boundaries. It is identified in table 18 that it is Verra's responsibility to make a final determination. Verra has made this choice to minimize the perception that project proponents may be influencing the definition of the jurisdiction to game results in their favor.</p> <ul style="list-style-type: none"> - Maps will be publicly available once developed - Data would be developed for multiple jurisdictions and projects would receive allocations from these separate jurisdictions. Updates will only be needed every 6 years. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 7 |
| Question | General |
| Section | 5 |
| Page (if relevant) | 7 |
| Line (if relevant) | 4 |
| Reviewer Organization | Biofilica Ambipar Environment; NBS Brazil Alliance; Carbonext |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | Verra doesn't specify estimated costs related to responsibilities of the PP (J-ADB-UD development) |
| Verra Response | This is being developed and will be communicated. |
| Aster Global Assessment | The methodology developer responded to the commenters question regarding costs related to responsibilities of the project proponent by stating that details on this process are being developed. It is unclear when these details will be developed and communicated. As all projects will be required to transition to the new methodology in the near future, the assessment team believes that the future costs should be communicated to project proponents as soon as possible. |
| Aster Global Initial Findings | CL: Please clarify when guidance on the costs related to responsibilities of the project proponent will be published and how it will be distributed to appropriate stakeholders. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: Fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects. The fee structure (in summary or in part) will be released with the final methodology. |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has elaborated that fee structure is yet to be determined. As such, Verra has not directly addressed the public comment. However, Verra has stated this public comment is out of scope with the assessment |

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| | <p>of the Methodology and AUDef module.</p> <p>The Assessment Team acknowledges fees related to AD allocation reports relate to programmatic decision making within Verra and are outside the scope of the Assessment.</p> |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects. The fee structure (in summary or in part) will be released with the final methodology. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 9 |
| Question | 1 |
| Section | General |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>We welcome VERRA's proposal of standardizing components of VCS's Avoiding Unplanned Deforestation Methodologies, but our first impression is that the application of the process described require more thinking and the testing of the procedure by project proponents. It would be important to ensure that financial and risk barriers are not being created.</p> <p>With these changes, Verra is requiring PPs and project developers to pay unknown sums of money and wait unknown periods of time with unknown delays to receive baseline and monitoring activity data. In terms of efficiency, Verra could be generating a bottleneck by relying entirely on unknown third-party data providers for this process. This aspect of the new methodology introduces significant risks, disincentives, and financial barriers for AUD projects to be certified under VCS.</p> <p>Since VERRA's stated goal is to improve consistency by standardizing the production of these data with high quality standards, we suggest that VERRA allow PPs and project developers to follow the published procedures with the same quality standards and oversight by VVBs as would be required of the third-party data providers.</p> <p>We recommend letting PPs and project developers continue to produce high-quality work as they have for years while increasing oversight and instituting scientific, evidence-based processes with high standards for quality. Many PPs and project developers have in-house capacity and cumulative decades of experience analyzing remotely sensed imagery and producing maps of land cover, land use, and land use change. We also have experience performing quality controls and statistical analysis of error and uncertainty on such products. Such a change would be simple for all parties, including Verra. It would eliminate the new bottleneck Verra is creating and</p> |

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| | mitigate costs without sacrificing quality or exacerbating differences in the ability of small vs. large PPs and project developers to participate in the voluntary carbon market for AUD projects under the VCS standard. |
| Verra Response | We acknowledge that we could generate bottlenecks and are committed to doing our best to avoid them. PPs are welcome to apply to be data service providers or to submit supplementary materials for consideration by data service providers. However, AD collection, risk mapping and allocation need to be done at the jurisdictional level for the AUDef module to work. |
| Aster Global Assessment | <p>The commenter expressed concern about</p> <ul style="list-style-type: none"> - timeliness - quality - designation of jurisdiction-level baseline data to DSPs <p>The commenter requests VERRA allow PPs and project developers to follow the published procedures with the same quality standards and oversight by VVBs as would be required of the third-party data providers. Verra responded it is appropriate to use a separate process to develop baseline data because they are done at a jurisdiction, not project level.</p> <p>Because this sentiment and request has been made elsewhere in public comments, this comment is duplicative; these findings have been opened elsewhere where Verra's response has insufficiently addressed the comment. In the instance of this comment, the assessment team deems the response adequately addressed.</p> |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | We acknowledge that we could generate bottlenecks and are committed to doing our best to avoid them. PPs are welcome to apply to be data service providers or to submit supplementary materials for consideration by data service providers. However, AD collection, risk mapping and allocation need to be done at the jurisdictional level for the AUDef module to work. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 10 |
| Question | General |
| Section | 4 APPLICABILITY CONDITIONS |
| Page (if relevant) | 4 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | According to the applicability conditions, in section 4, it seems that avoided unplanned grassland/shrubland is not impacted. This presents a potential issue with consistency, for example, with the existing VM0009, where the baseline for forest conversion and the baseline for grassland conversion are produced in very different ways; before, they followed very similar procedures and therefore were compatible and comparable. A project that intends to pursue AUD plus avoided conversion of another ecosystem type |

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| | would have to use two fundamentally different baseline types (i.e., the old Cumulative Deforestation Model in VM0009). |
| Proposed Change(s) | Add text clarifying this issue and propose possible solutions, such as providing activity data and performing an allocation using the same process for unplanned shrubland/grassland conversion. |
| Verra Response | <p>This would expand the scope of the methodology too much at this time. Grassland conversion should be dealt with through the existing methods.</p> <p>We will make sure that all elements of the existing AUDD methodologies are covered under the consolidated REDD methodology before withdrawing the existing ones.</p> |
| Aster Global Assessment | Based on the methodology developer's response, it is unclear how grassland conversion would be handled under the methodology as written. As all projects, including projects utilizing VM0009, will need to transition to the new AUD module within the Verra specified timelines, it is unclear how a project with a grassland conversion aspect could feasibly do so. |
| Aster Global Initial Findings | CL: Please clarify inline with assessor findings. |
| Round 1 Response from Methodology Developer | Grassland conversion would not be covered under the new methodology. Anyone applying an unplanned deforestation project will be required to use the new methodology within 6 months of the activity data being available. However, VM0009 will not be withdrawn in its entirety and projects can continue to use VM0009 for the grassland component of their projects. Further clarity has been provided in public announcements about the grace period and the possibility to use non-AUD portions of existing methodologies. See for example: https://verra.org/consolidated-redd-methodology-ensures-integrity-of-forest-conservation-credits/ and https://verra.org/methodologies-main/transition-of-redd-projects-to-the-consolidated-redd-methodology-faqs/ |
| Aster Global Findings Round 2 | The methodology developer further clarified that VM0009 will not be withdrawn in its entirety and portions will remain available for grassland conversion components of projects utilizing VM0009. This further clarification addresses the initial public comment. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | significant changes |
| Revised Verra Response October 2023 | Grassland conversion would not be covered under the new methodology. Anyone applying an unplanned deforestation project will be required to use the new methodology within 6 months of the activity data being available. A new Avoiding Conversion of Grasslands and Shrublands methodology has been proposed to Verra. However, VM0009 will not be withdrawn in its entirety and projects can continue to use VM0009 for the grassland component of their projects. Further clarity has been provided in public announcements about the grace period and the possibility to use non-AUD portions of existing methodologies. See for example: https://verra.org/consolidated-redd-methodology-ensures-integrity-of-forest-conservation-credits/ and https://verra.org/methodologies-main/transition-of-redd-projects-to-the-consolidated-redd-methodology-faqs/ |
| Aster Global Assessment of Revised Response | The assessment team notes that significant changes were made in the revised response. However, these changes do not affect the assessment team's initial review and thus no further review is warranted. |
| Comment # | 11 |
| Question | General |
| Section | 5 PROCEDURES |

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| Page relevant) | (if 6 |
| Line relevant) | (if N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>In the case a project proponent doesn't agree with the end product of risk map and allocation produced by VERRA, what would be the procedures for project proponents to request clarification and validate or quality-control what VERRA delivered? Will adjustments be done after a clarification process? There is conflicting text in the JNR Risk Map Tool vs the J-ADB-UD as to whether a project proponent can propose its own risk map if it can show it is better than that produced by Verra. For example: The JNR Risk Mapping Tool states, "Users of the JNR Allocation Tool may create risk maps using the approach that they consider most appropriate," and goes on to state that, "The risk map created with the alternative approach must be of similar or better quality than the best risk map produced with this JNR Risk Mapping Tool". In the original context, this indicated that the PP (the user) could use a risk mapping approach that includes additional variables (e.g., distance to roads) if the map met the criteria listed in the tool. However, the J-ADB-UD tool states, "This module shall be applied exclusively by Verra or Verra-selected providers for the purpose of developing and allocating the Jurisdictional Activity Data Baseline for AUD projects. Project Proponents may utilize this module for informational purposes only." The latter violates the original intention of the Risk Mapping Tool to allow for locally-adapted risk maps with causal frameworks that consider drivers of deforestation to be used if proven to be better than the driver-agnostic, correlation-based risk maps. However, this appears to be taken out of the hands of PP with no assurance that the risk maps generated will be appropriate to the local context and include additional factor maps; there is no process outlined for the PP to challenge the quality of the maps Verra is requiring them to buy or provide a replacement map, even if the PP can produce a proven, better map.</p> |
| Proposed Change(s) | Add text clarifying this issue. |
| Verra Response | Allocations will be assessed by an independent expert before being given to projects. Clarifications will be addressed on a project by project basis. The Verra Complaints and Appeals Policy (https://verra.org/programs/complaints-and-appeals-policy/) is available in case of any disagreement. |
| Aster Global Assessment | <p>The assessment team notes that stakeholders are able to submit supplementary material related to AD collection and risk mapping at the time of risk map development and AD allocation (per appendix 4 of the AuDef module). Commenter was asking about revisions following the development of risk maps and AD allocation, specifically requesting for clarifying language. The developer responded by stating clarifications will be addressed on a project by project basis. However, the assessment team found that this 'clarification' of the risk map and AD allocation, is not addressed in the text.</p> <p>Further, it's unclear in the current version who the 'user' is and who the 'producer' is. These terms are introduced suddenly without definition; The assessment team believes this is due to revisions from the publicly available draft module and the current version of the module.</p> |
| Aster Global Initial Findings | <p>CL: Please incorporate language addressing the instance of a project developer's disagreement/request for revision of risk map and AD allocation.</p> <p>CL: Please address finding related to user/producer.</p> |
| Round 1 Response | 1.- The Verra Complaints and Appeals Policy (https://verra.org/programs/complaints-and-appeals-policy/) is available in case of any disagreement. Cases submitted |

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| <p>from Methodology Developer</p> | <p>through this mechanism will be addressed on a project by project basis. 2.- The JNR Risk Mapping Tool was designed to be utilized in the context of the JNR Framework, not for this new REDD methodology; thus, differences between them do not pose conflicts. 3.- The updated version of VM0184 and its AUDef module do clarify the way in which the jurisdictional risk model and map is constructed and adopted. This includes the construction of alternative risk models that include additional variables correlated with deforestation drivers.</p> |
| <p>Aster Global Findings Round 2</p> | <p>The assessment team confirmed that clarifying language is included in the updated version of the methodology/module, sufficient to address the commenter's questions.</p> <p>The assessment team notes that no response has been provided pertaining to the clarification of user/producer, and the updated methodology/module do not directly address this comment.</p> |
| <p>Round 2 NCR/CL/OFI2</p> | <p>CL: Please address the finding related to user/producer.</p> |
| <p>Round 2 Response from Methodology Developer</p> | <p>Revised public comment (NO CHANGE FROM ROUND 1): 1.- The Verra Complaints and Appeals Policy (https://verra.org/programs/complaints-and-appeals-policy/) is available in case of any disagreement. Cases submitted through this mechanism will be addressed on a project by project basis. 2.- The JNR Risk Mapping Tool was designed to be utilized in the context of the JNR Framework, not for this new REDD methodology; thus, differences between them do not pose conflicts. 3.- The updated version of VM0184 and its AUDef module do clarify the way in which the jurisdictional risk model and map is constructed and adopted. This includes the construction of alternative risk models that include additional variables correlated with deforestation drivers.</p> <p>Note to Aster: Original public comment did not express any questions related to user's or producer's accuracies, so it should not be mentioned in developer response. To respond to Aster R2 Findings unrelated to public comment, a clarification of user's and producer's accuracies has been added to A1.4.3. Note these are universally used terms in the accuracy assessment of maps, and would be immediately understood by all data service providers.</p> |
| <p>Aster Global Findings Round 3</p> | <p>The clarification added in Section A1.4.3 directly addresses the comment and thus is sufficient to close this finding.</p> |
| <p>Status</p> | <p>closed R3</p> |
| <p>Response Updated Since Finding Closed?</p> | <p>wording/typo updates only</p> |
| <p>Revised Verra Response October 2023</p> | <p>1. The Verra Complaints and Appeals Policy (https://verra.org/programs/complaints-and-appeals-policy/) is available in case of any disagreement. Cases submitted through this mechanism will be addressed on a project by project basis. 2. The JNR Risk Mapping Tool was designed to be utilized in the context of the JNR Framework. It was never fully published and has been replaced by <i>VT0007 Unplanned Deforestation Risk Mapping and Allocation Tool (UDef-RAT)</i>. VT0007 will be used with JNR and VM0047. 3. The updated version of VM0048 and its AUDef module do clarify the way in which the jurisdictional risk model and map is constructed and adopted. This includes the construction of alternative risk models that include additional variables correlated with deforestation drivers.</p> |

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| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 12 |
| Question | General |
| Section | 5 PROCEDURES |
| Page (if relevant) | 6 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Timeline is missing. This will help Verra and PPs to adjust workplans. |
| Proposed Change(s) | Please provide a timeline of the process for each of the steps described in Figure 1. |
| Verra Response | Verra will add an indicative timeline to <i>AUDef</i> when we have established AD for all jurisdictions. Until then, we will communicate proactively about when project proponents can expect data for specific jurisdictions. |
| Aster Global Assessment | Verra has declined to draft a generic timeline for AD encompassing all/any jurisdictions. Instead, verra will release communication of AD development on a jurisdiction-by-jurisdiction basis. The assessment team notes that Verra has already begun setting expectations for specific jurisdictions on Verra's website. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Verra will add an indicative timeline to <i>AUDef</i> when we have established AD for all jurisdictions. Until then, we will communicate proactively about when project proponents can expect data for specific jurisdictions. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 13 |
| Question | General |
| Section | 5 PROCEDURES |
| Page (if relevant) | 6 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including | If Verra will charge a fee to PPs requesting allocation of activity data, those cost should be mentioned in this document. In addition, Verra must provide a transparent process |

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| general questions & comments | <p>for justifying any costs incurred via this new revenue stream it has created for itself. There should be a justification provided as to why this centralized solution produces both the most accurate and consistent carbon accounting, given that the product will ultimately undergo quality control by a VVB, a process which could have occurred with a risk map or activity data generated by the PP or the project developer it chose to contract.</p> <p>i. Will the costs have to be paid for every single period (every time they create a new risk map)? Or just for the first period? Will these costs have to be paid for activity data during every monitoring period? If these costs must be paid every time, Verra should consider that this becomes prohibitively expensive and puts net-positive project revenue at risk.</p> <p>ii. There must also be a clear and well-designed cost sharing process, e.g., a means to reimburse a project proponent for the investment it makes to generate the AD and risk map when another project is later established in the same jurisdiction.</p> |
| Proposed Change(s) | Provide fees VERRA will charge and provide better clarification to mentioned in this comment OR allow project proponents to produce maps and activity data with the same quality controls, standards, and oversight. |
| Verra Response | <p>VCS Program fees are only included in the <i>VCS Program Fee Schedule</i>. We will communicate about the fee when it has been set.</p> <p>The cost of AD collection, risk mapping and allocation will be averaged across all projects accessing this data - there will be one set fee regardless of project size or number of projects per jurisdiction.</p> <p>The fee will be charged when a project submits an AD Allocation Request form (once every baseline validity period).</p> |
| Aster Global Assessment | <p>The commenter requested a justification be provided that the centralized approach taken by the methodology produces both the most accurate and consistent carbon accounting. Such justification was not provided in the methodology developer's response.</p> <p>The methodology developer clarified that the fee will be charged when a project submits AD allocation request form. However, it is unclear how the cost averaging approach mentioned by the methodology developer addresses the commenter's concern about cost sharing.</p> |
| Aster Global Initial Findings | <p>CL: Please provide the requested justification.</p> <p>CL: Pleas provide additional clarification regarding the proposed cost sharing approach, and how it addresses the commenter's concern.</p> |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The approach taken (risk allocated approach) is based on the fact that there is greater accuracy at a larger scale, that all accounting in the jurisdiction will not 'add up' to more than the total jurisdictional deforestation, and that a consistent approach to nesting can be assured across the entire jurisdiction.</p> <p>Verra has centralized the approach because requiring every project to do this would 1) cause a huge replication of effort and duplication of cost and disruption to government officials and other projects (as every project sought to collect data); and 2) Result in potentially contradictory data that undermines confidence in quality.</p> <p>Fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects. Our intention is to ensure that most projects benefit from having baseline data given to them.</p> <p>Explanation of original Verra response:</p> |

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| | <p>Original response left out clarification of and justification for need for one set of data per jurisdiction.</p> <p>Added standardized response regarding cost-sharing.</p> |
| Aster Global Findings Round 2 | <p>The methodology developer has provided a justification for the centralized approach, thus addressing this portion of the comment.</p> <p>Regarding fees, the assessment team understands that further clarification cannot be provided regarding specific costs, but the notes the assessment team has provided information pertaining to dispersing the costs equitably. This item is addressed.</p> |
| Status | closed R2 |
| Response Updated Since Finding Closed? | fee text added/revised |
| Revised Verra Response October 2023 | <p>The approach taken (risk allocated approach) is based on the fact that there is greater accuracy at a larger scale, that all accounting in the jurisdiction will not 'add up' to more than the total jurisdictional deforestation, and that a consistent approach to nesting can be assured across the entire jurisdiction.</p> <p>The fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects. The fee structure (in summary or in part) will be released with the final methodology.</p> <p>Verra has centralized the approach because requiring every project to do this would 1) cause a huge replication of effort and duplication of cost and disruption to government officials and other projects (as every project sought to collect data); and 2) Result in potentially contradictory data that undermines confidence in quality.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response, including language on fee structure. No further review is required. |
| Comment # | 14 |
| Question | General |
| Section | 5 PROCEDURES |
| Page (if relevant) | 6 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | We suggest revising the order of the steps in Figure 1. The graphic shows that "PP contracts project validation of PD (including Allocation tool (AT) output). It is not clear why the PP would request a validation of the AT output again at this stage - Is the idea that the PP will request an audit for a product that a service provider of Verra has/will produce? Is this audit/QC not already part of the AD production and allocation process? |
| Proposed Change(s) | It seems more logical that the AT for the project would be validated by Verra before it is distributed to the PP. Please review and consider revising these steps. |

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| Verra Response | This is not an issue in the current version of the methodology or module since Figure 1 does not exist. Currently, AD allocated to projects is assessed by an independent expert; the project's VVB should not question it. |
| Aster Global Assessment | The methodology developer clarified that the figure the commenter was referencing is no longer included in the methodology. Clarification is provided that an independent expert assesses the AD allocation, not the VVB. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | This is not an issue in the current version of the methodology or module since Figure 1 does not exist. Currently, AD allocated to projects is assessed by an independent expert; the project's VVB should not question it. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 15 |
| Question | General |
| Section | 5 PROCEDURES |
| Page (if relevant) | 6 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | As stated below: "Verra may choose to contract third-party service providers to develop activity data, map products, and manage application of the JNR-AT and JNR-RMT on its behalf. The selection of such providers is at the sole discretion of Verra". |
| Verra Response | Verra will publicly publish all RFPs for data service providers, including qualifying criteria and the criteria by which proposals will be assessed. |
| Aster Global Assessment | The assessment team determined the steps listed as to be taken Verra are sufficient to address the commenter's concern. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Verra will publicly publish all RFPs for data service providers, including qualifying criteria and the criteria by which proposals will be assessed. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 16 |
| Question | General |
| Section | 5 PROCEDURES |

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| Page relevant) (if | 7 |
| Line relevant) (if | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>On the “responsibilities of Project Proponent related to J-ADB-UD”</p> <p>a. Project proponents has the option to submit forest cover benchmark maps (FCBM), it will good to specify if this forest benchmark is over the proposed jurisdiction or just for the project area. Also, clarify whether the PP can also submit its own, better risk map, as is suggested by the JNR Risk Map Tool</p> <p>b. Payment of AD generation and allocation fees to Verra.</p> <p>i. Please add information that advise on the cost and mechanism through which the payment will be applied.</p> <p>ii. According to the webinars held by VERRA, this is not yet clear, but it seems that the cost will be divided among project proponents. However, what if only one project is proposed within a given jurisdiction for a long time period?</p> <p>iii. Will there be reimbursements to the PP that originally paid to produce the activity data and risk maps?</p> <p>c. Contracting Project validation including allocated AD from JNR-AT.</p> <p>i. We also suggest revising the procedures and step, as mentioned before in the comment of the order of steps in Figure 1.</p> <p>ii. We think this step as is shown in the Figure 1, could create uncertainty and hesitation for the project proponent because the product (risk map and allocation) was done by another party hired by VERRA. So, does this mean that the PP must perform its own internal auditing (an additional investment of time, money, and resources) to ensure that those products were produced and perform well and then must wait for the VVB to do this during the validation? What if it does not pass the approval? Why require the purchase of data products that do not come with quality controls or validation?</p> |
| Proposed Change(s) | <p>Modifying the description based on comments and questions made by CI.</p> <p>Regarding the fee structure, one option would be to let the project pay for AD generation and risk mapping retroactively once a successful verification is completed and VCUs have been generated and sold. Another option is to simply eliminate this added cost (and added delays) by letting PPs produce their own data with the same quality standards and oversight.</p> |
| Verra Response | <p>a. Project proponents may submit jurisdictional- or project-level FCBMs (see <i>AUDef</i> Appendix 4)</p> <p>b. See #7. No reimbursement will be provided to stakeholders that submit supplemental materials</p> <p>c. See #11</p> |
| Aster Global Assessment | <p>a. Verra has stated project proponents may submit jurisdictional and project level FCBMs. The assessment team confirms this text is present in Appendices 3 and 4.</p> <p>b. Verra has clarified no reimbursement. The assessment team finds no conflicting language in the AuDef module to suggest otherwise.</p> <p>c. The assessment team broadly interprets the comment as a concern with relying on a third-party map/AD. The assessment team assesses Verra's response here as minimal .</p> |
| Aster Global Initial Findings | <p>CL: Please address commenter's concerns in c. The previous response, referencing another comment, did not full, directly address comment.</p> |

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| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <p>a. Project proponents may submit jurisdictional- or project-level FCBMs (see AUDef Appendix 4)</p> <p>b. See #7. No reimbursement will be provided to stakeholders that submit supplemental materials</p> <p>c. This represents a misunderstanding by the questioner of the process. The PP has no responsibility for the approval of jurisdictional AD or the risk maps. Indeed the VVB has no role in approval of jurisdictional AD and risk maps. Approval is by independent expert.</p> <p>Explanation of original to Verra Response: Clarification added to comment C</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | The additional clarification provided in the revised response to item C is sufficient to close the identified finding, as it notes a misunderstanding of the process resulted in the question. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates only |
| Revised Verra Response October 2023 | <p>a. Project proponents (PPs) may submit jurisdictional- or project-level FCBMs as long as they can be recreated by Verra (see AUDef Appendix 4)</p> <p>b. See #7. No reimbursement will be provided to stakeholders that submit supplemental materials</p> <p>c. This represents a misunderstanding by the questioner of the process. The PP has no responsibility for the approval of jurisdictional AD or the risk maps. Indeed the VVB has no role in approval of jurisdictional AD and risk maps. Approval is by independent expert.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 17 |
| Question | General |
| Section | 5 PROCEDURES |
| Page (if relevant) | 7 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>On "Other responsibilities of the Project Proponent"</p> <p>a. Development of project-area-specific Emission Factors (EFs) using an applicable AUD Methodology.</p> <p>i. It is important to clarify whether projects can use existing EFs used by a country to prepare its national or subnational REDD+ FREL, especially if already submitted to the UNFCCC and used as part of national GHG inventories. Alignment with the FREL is critical in order to be ensure aligned with the national data and GHG accounting efforts.</p> <p>ii. In the webinar, it was mentioned that the project could follow national data only if</p> |

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| | <p>the FREL is registered under Verra's system and approved by a VVB. Does this mean that countries will need to register the FREL before FREL data can be used by stand-alone projects?</p> |
| Proposed Change(s) | <p>Review and modify the description and requirements based on comments and questions posed by CI.</p> <p>We suggest VERRA to consider allowing PPs to request the a review of FREL to be used as source of the carbon stocks and emissions factors. This process would be essential for cases where a government has not yet completed the process of registering and validating the FREL, in which case a PP could present it as a source and initiate the approval process without having to wait for the government's decision to do this.</p> |
| Verra Response | <p>FRELS will be considered in the collection of AD as long as the AD used to create them is available and meets VCS requirements</p> |
| Aster Global Assessment | <p>It is unclear, based on Verra's response, and Table 17 in appendix 4, if DSPs, should, may, or must use FRELS not registered with Verra.</p> |
| Aster Global Initial Findings | <p>CL: Please clarify in line with finding.</p> |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Per Appendix 4, Table 18, data including those developed for the FREL may be submitted by stakeholders. If it is available, DSPs must consider the activity data underlying government FRELS. In this methodology, activity data, rather than carbon stocks, are allocated to projects.</p> <p>Currently, activity data used for FRELS will rarely meet Verra requirements. However, emission factors used in FRELS may be used by project proponents as long as they are appropriate to their project areas.</p> <p>If the statement the commenter refers to as having been made in the webinar was made, it was made in error.</p> <p>Explanation of original Verra response: We stand by the original response but have added have added specificity with respect to the table referenced by Aster and to add missing data.</p> |
| Aster Global Findings Round 2 | <p>The methodology developer has updated their response to the comment with further detail that addresses the initial comment and the clarification request issued by the assessment team. Item closed.</p> |
| Status | <p>closed R2</p> |
| Response Updated Since Finding Closed? | <p>no</p> |
| Revised Verra Response October 2023 | <p>Per Appendix 4, Table 18, data including those developed for the FREL may be submitted by stakeholders. If it is available, DSPs must consider the activity data underlying government FRELS. In this methodology, activity data, rather than carbon stocks, are allocated to projects.</p> <p>Currently, activity data used for FRELS will rarely meet Verra requirements. However, emission factors used in FRELS may be used by project proponents as long as they are appropriate to their project areas.</p> <p>If the statement the commenter refers to as having been made in the webinar was made, it was made in error.</p> |

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| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 18 |
| Question | General |
| Section | 5.1 Submission of Jurisdictional Activity Data Baseline Allocation Request |
| Page (if relevant) | 7 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | As mentioned above, Verra should provide timelines for responses and closure on fee structures. Also, will the information listed in this section (item 1 through 7) be part of the template that Verra will provide to PPs for submitting the activity data requests? |
| Proposed Change(s) | Please provide a timeline for this process to increase confidence that Verra can deliver the required AD in a timely and efficient manner. Please provide a draft template for requesting activity data. |
| Verra Response | See #12 Current <i>AUDef</i> Appendix 3 Section 3.1 describes the information that will be in the <i>AD Baseline Allocation Request</i> form. We will provide this form in the coming months. |
| Aster Global Assessment | Verra's response adequately addresses this comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates only |
| Revised Verra Response October 2023 | See #12 Current <i>AUDef</i> Appendix 3 Section 3.1 describes the information that must be submitted will be in the <i>AD Baseline Allocation Request</i> form. We will provide this form in the coming months. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 19 |
| Question | General |
| Section | 5.3 Development of the Jurisdictional Risk Map |
| Page (if relevant) | 8 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |

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| Response(s) - including general questions & comments | When will Verra set up the process to periodically consider alternative risk mapping approaches submitted by Project Proponents or other stakeholders. Would this be every 6 years? See further questions and comments in the J-ADB-UD section of this document and Key Question #2. |
| Proposed Change(s) | Clarify whether this process would occur, and whether it will be aligned with the rest of the tools and validity periods (every 6 years). |
| Verra Response | This process is set out in current ADef Appendix 3 A3.3.4 and VT000X <i>Unplanned Deforestation Risk Modeling and Mapping Procedure (UDef-RP)</i> . It will occur every six years. |
| Aster Global Assessment | Appendix 3 A3.3.4 describes the processes of alternative risk mapping approaches and due account is taken by clarifying this will occur every six years. However, the assessment team does not have a version of Udef-RP to determine if this comment has been fully assessed. |
| Aster Global Initial Findings | CL: Please provide the assessment team with a copy of Udef-RP. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: This process is set out in current ADef Appendix 3 A3.3.4 and VT000X Unplanned Deforestation Risk Modeling and Mapping Procedure (UDef-RP). It will occur every six years.</p> <p>Explanation of original Verra Response: Verra affirms the original Verra response.</p> <p>Response to additional points raised by Aster: Verra has shared the Udef-RP</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | The assessment team notes that the Udef-RP was shared by the methodology developer and that further review of this tool is out of scope of this assessment. This item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates only |
| Revised Verra Response October 2023 | This process is set out in current ADef Appendix 3 A3.3.4 and VT0007 X Unplanned Deforestation Risk Modeling and Mapping Procedure (UDef-RP) . It will occur every six years. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 20 |
| Question | General |
| Section | 5.3 Development of the Jurisdictional Risk Map |
| Page (if relevant) | 8 |
| Line (if relevant) | N/A |

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| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | It is a good idea to allow PPs to have the option of creating their own FCBMs for the Project Area and the Leakage Belt for submission to and consideration by Verra. In the case a PP produces a PA+LB FCBM with demonstrated higher accuracy than that of the Verra map, project-level maps shall be integrated into the jurisdictional FCBMs. In such a case, how will different techniques (i.e., supervised classification with X algorithm used by jurisdiction PPs) be reconciled with the technique used by Verra/third-party and how will the level of accuracy will be evaluated and compared? |
| Proposed Change(s) | Provide clarification on how different techniques applied at jurisdiction and at local level will be matched and reconciled. |
| Verra Response | This is defined in current <i>AUDef</i> Appendix 1 A1.4.3 |
| Aster Global Assessment | The methodology developer directed the commenter to Appendix 1 A1.4.3 of the module, which provides the requested clarification. However, the assessment team has identified several findings pertaining to this process and thus this item is pending. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The approach to incorporating project-developed FCBMp is defined in <i>AUDef</i> Appendix 1 A1.4.3. Remote sensing techniques for generating forest cover maps are constantly evolving, and Verra does not wish to limit the range of techniques that project and data service providers can employ. A universal test of accuracy is applied to all maps, whether produced by DSPs or project proponents. The maps performing best on this standard, described in "A1.4.13 Step 1 - Conduct Jurisdictional Mapping - Where Relevant, Integrate Project FCBMs into Jurisdictional FCBMs." Maps are assessed only by their accuracy, not by the techniques used to produce them.</p> <p>Explanation of original Verra Response: Verra reaffirms response, but adds additional detail.</p> <p>Response to additional points raised by Aster: Aster references unspecified public comments other than the one associated with this response. For clarity, Verra addresses all comments in the location they are originally raised.</p> |
| Aster Global Findings Round 2 | The methodology developer has provided detail on how project level FCBMs will be incorporated into the jurisdictional FCBM, noting that accuracy is the benchmark for incorporation regardless of technique applied. This item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates only |
| Revised Verra Response October 2023 | <p>The approach to incorporating project-developed FCBMp is defined in <i>AUDef</i> Appendix 1 A1.4.3. Remote sensing techniques for generating forest cover maps are constantly evolving, and Verra does not wish to limit the range of techniques that project and data service providers can employ. A universal test of accuracy is applied to all maps, whether produced by DSPs or project proponents. The maps performing best on this standard, described in A1.4.43 Step 1 in the subsection "Where Relevant, Integrate Project FCBMs into Jurisdictional FCBMs." Maps are assessed only by their accuracy, not by the techniques used to produce them.</p> |

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| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 21 |
| Question | General |
| Section | 5.4. Jurisdictional Activity Data Baseline Allocation |
| Page (if relevant) | 9 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | It is not clear if Verra or PPs are covering any of these costs (e.g., validating the project boundary at a very early stage, before there is activity data, at time before the PP has assurance that the project is feasible). Doing validation in stages is an additional cost to project proponent, especially considering that boundary validation is usually done on site. |
| Proposed Change(s) | In the best-case scenario, Verra will make decisions to avoid adding additional costs to projects. |
| Verra Response | It is outside of the scope of this methodology to include Verra's fees. Verra will charge a fee for allocation of activity data. Projects will cover the usual validation and verification fees but will benefit from the fact that the activity data does not need additional validation or verification. |
| Aster Global Assessment | The assessment team's review of the Module corroborates this response. The fee to Verra for the AD Allocation Report does not require an additional cost of validation of the data products included in the AD Allocation Report. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | fee text added/revised |
| Revised Verra Response October 2023 | <p>It is outside of the scope of this methodology to include Verra's fees. Verra will charge a fee for allocation of activity data. The fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects. The fee structure (in summary or in part) will be released with the final methodology.</p> <p>Projects will cover the usual validation and verification fees but will benefit from the fact that the activity data does not need additional validation or verification.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response, including language on fee structure. No further review is required. |
| Comment # | 22 |
| Question | General |
| Section | 5.5. Development of the Project Description |
| Page (if relevant) | 9 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |

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| Reviewer Country | USA |
| Response(s) - including general questions & comments | There is a need to better describe how the integration of multiple project activity types (e.g., AUD + ARR) will be carried out under this approach. Based on our present understanding, the allocation tool has built-in capabilities to include "forest enhancement", but we are not sure how it would work, and this part of the tools has not yet been made operational. In addition, for ARR removals, projects must apply specific VCS methodologies that is not included in these new modules under revision. It is not clear how the rules of the ARR methodology would or would not come into play when there are non-forest areas in the baseline that become forest during monitoring (accounted as forest regrowth) if/when the project generate removals credits under this circumstance. |
| Proposed Change(s) | Modifying the description based on comments and questions made by CI. |
| Verra Response | ARR is entirely separate and would not overlap with AUD as the areas subject to (and allowable for ARR) must have been non-forest (in reality, no in a baseline scenario) for a longer period of time. In other words, if you are reforesting non-forest land, this will be accounted for separately. If the question relates to re-growth and removals foregone, i.e. regeneration of degraded forest that would have been deforested in the baseline, this can be accounted for as usual under the AUD methodologies - as and when regrowth is demonstrated in areas expected to be deforested. |
| Aster Global Assessment | The assessment team deems this response to sufficiently address the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | ARR is entirely separate and would not overlap with AUD as the areas subject to (and allowable for ARR) must have been non-forest (in reality, no in a baseline scenario) for a longer period of time. In other words, if you are reforesting non-forest land, this will be accounted for separately. If the question relates to re-growth and removals foregone, i.e. regeneration of degraded forest that would have been deforested in the baseline, this can be accounted for as usual under the AUD methodologies - as and when regrowth is demonstrated in areas expected to be deforested. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 23 |
| Question | General |
| Section | 6 TRANSPARENCY |
| Page (if relevant) | 9 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Additional transparency is needed regarding the data produced by Verra. |

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| Proposed Change(s) | As mentioned above, it would be important to add timelines for when responses can be expected, processes for addressing PP's data quality concerns, cost/fee structures, and whether data products are charged a la carte (per product), with a flat fee, based on project area or jurisdiction size, and with a single up-front cost vs. costs charged during credit generation. |
| Verra Response | Verra will publicly publish all RFPs for data service providers, including qualifying criteria and the criteria by which proposals will be assessed. |
| Aster Global Assessment | Several commenters have also inquired about the timeliness of baseline data. Verra has stated they will be timely several times; to assuage concerns from project developers, the Assessment Team would like Verra to detail how this will be accomplished. |
| Aster Global Initial Findings | CL: Please clarify, in line with finding |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Verra will publicly publish all RFPs for data service providers, including qualifying criteria and the criteria by which proposals will be assessed. Verra recognizes the desire for project proponents to have better clarity on timelines and cost structure. However, such procedures are not part of the texts of this methodology/module and will be addressed through other channels as soon as they are finalized.</p> <p>Explanation of original Verra Response: Verra reaffirms response, but adds additional detail.</p> <p>Response to additional points raised by Aster: Aster references unspecified public comments other than the one associated with this response. For clarity, Verra addresses all comments in the location where they were originally raised. Verra considers questions of timelines and fee structure to be out of scope of an assessment of this methodology and module. The methodology/module documents are not intended to describe such more administrative or procedural elements.</p> |
| Aster Global Findings Round 2 | The methodology developer provided a revised response to the public comment and noted that the referenced procedures will be addressed through other channels as soon as they are finalized. As noted by the methodology developer, these procedures are not part of the methodology/module and thus the assessment team finds the additional information sufficient to close the identified finding. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | fee text added/revised |
| Revised Verra Response October 2023 | <p>Verra will publicly publish all RFPs for data service providers, including qualifying criteria and the criteria by which proposals will be assessed. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects. The fee structure (in summary or in part) will be released with the final methodology.</p> <p>Verra recognizes the desire for project proponents to have better clarity on timelines and cost structure. However, such procedures are not part of the texts of this methodology/module and will be addressed through other channels as soon as they are finalized.</p> |
| Aster Global Assessment | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response, including language on fee structure. No further review is required. |

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| of Revised Response | |
| Comment # | 24 |
| Question | 1 |
| Section | General |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>It might be more interesting for Verra to develop guidelines/requirements so any organization can replicate the process. Project developers often do several assessments to understand the feasibility of a REDD project before submitting a PDD, and it might be unfeasible to request (and pay) for this activity data (for example) at the feasibility stage. There are general concerns about the capacity of Verra to deliver the Activity Data Baseline for AUD in a timely and cost-effective manner. Taking into consideration that there is a backlog of almost 2y of projects and a very ambitious carbon market out there.</p> |
| Verra Response | <p>Current <i>AUDef</i> Appendix 1 sets out the process that Verra will follow to develop AD; <i>UDef-RP</i> and <i>UDef-AP</i> will be publicly available - these things should enable projects to replicate the processes for feasibility studies.</p> <p>Verra is doing our best to resource effectively so as not to be a barrier to project development and implementation.</p> |
| Aster Global Assessment | <p>Several commenters have also inquired about the timeliness of baseline data. Verra has stated they will be timely several times; to assuage concerns from project developers, the Assessment Team would like Verra to detail how this will be accomplished.</p> <p>Several commenters have also asked if stakeholders other than govts will inform the delineation of jurisdictions; to better address these comments, the assessment team asks Verra to explain how it may be inappropriate or unwarranted to have feedback from stakeholders other than govts.</p> |
| Aster Global Initial Findings | CL: Please elaborate on Verra's response to this comment, in line with the finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: 1) Current <i>AUDef</i> Appendix 1 sets out the process that Verra will follow to develop AD; <i>UDef-RP</i> and <i>UDef-AP</i> will be publicly available - these things should enable projects to replicate the processes for feasibility studies. 2) Verra is doing our best to resource effectively so as not to be a barrier to project development and implementation. Verra is accelerating the process by contracting out the data creation to a number of different service providers, who are drawn from highly regarded international remote sensing firms. As of July 2023, 12 jurisdictions are under development with the goal to complete all by the end of 2024. Verra is exploring ways to further accelerate the rollout of these datasets.</p> <p>Explanation of original Verra Response: Verra considers the original response to adequately address both points in the original public comment. Additional detail provided based on updates on progress on jurisdictional data service provider contracting.</p> |

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| | <p>Response to additional points raised by Aster:</p> <p>1) Verra considers questions of timelines to be out of scope of an assessment of the module</p> <p>2) Appendix 4 describes fully the ways in which stakeholders may provide input into the development of data products, and makes clear that governments and other stakeholders may provide recommendations on the proposed boundaries. It is identified in table 18 that it is Verra's responsibility to make a final determination. Verra has made this choice to minimize the perception that project proponents may be influencing the definition of the jurisdiction to game results in their favor.</p> |
| Aster Global Findings Round 2 | The methodology developer's revised response provides additional considerations. The assessment team determined that this revised response has taken due account of the comment. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>1) Current AUDef Appendix 1 sets out the process that Verra will follow to develop AD; UDef-RP and UDef-AP will be publicly available - these things should enable projects to replicate the processes for feasibility studies.</p> <p>2) Verra is doing our best to resource effectively so as not to be a barrier to project development and implementation. Verra is accelerating the process by contracting out the data creation to a number of different service providers, who are drawn from highly regarded international remote sensing firms. As of July Oct 2023, 13 jurisdictions are under development with the goal to complete all by the end of 2024. Verra is exploring ways to further accelerate the rollout of these datasets.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 25 |
| Question | General |
| Section | 4 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | According to the applicability conditions, in section 4, it seems that avoided unplanned grassland/shrubland is not impacted. This should be clarified in the text. |
| Verra Response | Current applicability conditions make it clear that the project needs to be aimed at avoiding unplanned deforestation |
| Aster Global Assessment | The assessment team determined that is the applicability conditions in the most recent version of the module do not reference grassland/shrubland, this comment has been assessed. |
| Status | closed R1 |
| Response Updated | wording/typo updates |

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| Since Finding Closed? | |
| Revised Verra Response October 2023 | Current applicability conditions in <i>AUDef</i> make it clear that the project needs to be aimed at avoiding unplanned deforestation |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 26 |
| Question | General |
| Section | 5 |
| Page (if relevant) | 6 |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | It seems that the VVB would be the checks and balances mechanism to oversee Verra's decisions, but would PP have the opportunity to contest/appeal the results? Does Verra plan to have any mechanisms to hear the PP, or it would be accept or leave it? |
| Verra Response | Allocations will be assessed by an independent expert before being given to projects. Clarifications will be addressed on a project by project basis. The Verra Complaints and Appeals Policy (https://verra.org/programs/complaints-and-appeals-policy/) is available in case of any disagreement. |
| Aster Global Assessment | Given the numerous comments regarding appeals, please address this within the module |
| Aster Global Initial Findings | CL: Please address finding |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Allocations will be assessed by an independent expert before being given to projects. We currently don't have plans for a jurisdiction-specific consultation, but may add them in the future.</p> <p>General VCS Program practices apply to stakeholders' opportunities to engage with AD developed and allocated for this methodology:</p> <ul style="list-style-type: none"> - Clarifications will be addressed on a project by project basis. - The Verra Complaints and Appeals Policy (https://verra.org/programs/complaints-and-appeals-policy/) is available in case of any disagreement. <p>Explanation of original Verra response: We currently don't have plans for a jurisdiction-specific consultation, but may add them in the future.</p> <p>Response to additional points raised by Aster: Because there is no mechanism currently planned, we are defaulting to VCS Program/Verra SOPs which are described elsewhere in VCS Program documents and do not have to be repeated in the methodology.</p> |

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| Aster Global Findings Round 2 | The methodology developer indicates that complaints will be assessed in line with general VCS Program Practices. The assessment team determine this response is sufficient to close the identified finding. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>Allocations will be assessed by an independent expert before being given to projects. We currently don't have plans for a jurisdiction-specific consultation, but may add them in the future.</p> <p>General VCS Program practices apply to stakeholders' opportunities to engage with AD developed and allocated for this methodology: - Clarifications will be addressed on a project by project basis. - The Verra Complaints and Appeals Policy (https://verra.org/programs/complaints-and-appeals-policy/) is available in case of any disagreement.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 27 |
| Question | General |
| Section | 5 |
| Page (if relevant) | 6 |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Further guidance is need for the cases where the registered FREL does not cover the project area, historical period or ecosystem type. |
| Verra Response | See #2 |
| Aster Global Assessment | It is unclear how the response to comment 2 answers the comment regarding partial/no overlap of a registered FREL and the project area. |
| Aster Global Initial Findings | CL: Please elaborate on Verra's response to this comment, in line with the finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: In these cases the data service provider will develop the activity data for the jurisdiction. A future FREL would be adopted as and when a JNR registration occurs.</p> <p>Explanation of original Verra Response: provided.</p> <p>Further clarification of Verra Response: provided.</p> <p>Response to additional points raised by Aster: N/A</p> |

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| Aster Global Findings Round 2 | The assessment team notes that further clarification is provided that is sufficient to close the identified finding. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | In these cases the data service provider will develop the activity data for the jurisdiction. A future FREL would be adopted as and when a JNR registration occurs. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 28 |
| Question | General |
| Section | 5 |
| Page (if relevant) | 7 |
| Line (if relevant) | 4 |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Responsibility of the project proponent includes contracting project validation including allocated AD from JNR-AT - further clarification is needed. |
| Verra Response | This would expand the scope of the methodology too much at this time. Grassland conversion should be dealt with through the existing methods. We will make sure that all elements of the existing AUDD methodologies are covered under the consolidated REDD methodology before withdrawing the existing ones. |
| Aster Global Assessment | It is unclear how Verra's response addresses the comment regarding whether the PP requires validation of AD. |
| Aster Global Initial Findings | CL: Please address comment. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: The AD for the allocated reference level is NOT subject to validation. This goes through approval by the independent expert. Explanation of original Verra Response: Original response was mistakenly assigned to this row, and does not respond to the public comment. Response to additional points raised by Aster: N/A |
| Aster's initial response is in/out of | out of scope |

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| scope for VVB review | |
| Aster Global Findings Round 2 | The methodology developer has determined this comment is outside the scope the assessment. Regardless, the assessment team determined the revised response is sufficient to close the identified finding. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The AD for the allocated reference level is NOT subject to validation. This goes through approval by the independent expert. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 29 |
| Question | General |
| Section | 5 |
| Page (if relevant) | 6-7 |
| Line (if relevant) | Introduction |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | If Verra will charge a fee to PPs requesting allocation of activity data, those costs should be mentioned somewhere in this document. In addition, Verra must provide a transparent process for justifying any costs incurred via this new revenue stream it has created for itself. There should be a justification provided as to why this centralized solution produces both the most accurate and consistent carbon accounting, given that the product will ultimately undergo quality control by a VVB, a process which could have occurred with a risk map generated by the PP or the project developer it chose to contract. Will the costs have to be paid for every single period (every time they create a new risk map)? Or just for the first period? If they must be paid every time, Verra should consider that this becomes prohibitively expensive. There must also be a clear and well-designed cost sharing process, e.g., a means to reimburse a project proponent for the investment it makes to generate the AD and risk map when another project is later established in the same jurisdiction. |
| Verra Response | This is being developed and will be communicated. In addition it may be shown that the cost would not necessarily be prohibitive and indeed would likely be far below the cost currently born by individual projects. |
| Aster Global Assessment | Given the plethora of similar comments, if Verra believes it may it may be shown that the cost would not necessarily be prohibitive and indeed would likely be far below the cost currently born by individual projects, the assessment team believes it would be prudent to assuage concerns. |
| Aster Global Initial Findings | OFI: Please post a demonstration of cost-savings borne by PPs. |
| Round 1 Response from | Revised Verra comment addressing original public comment: 1) There will be fees for projects to receive the allocated activity data. Projects no longer have to bear costs of data generation, thus offsetting this new expense. |

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| Methodology Developer | <p>Methodologies and modules do not customarily include information on Verra fees. Such information would be incorporated into separate application guidance, once the fee structure is finalized.</p> <p>2) The move to a jurisdictional nested approach was a foundational decision made by Verra three years ago and has been extensively communicated in numerous fora. Verra accepts that for individual projects, the baselines may now differ from what they were under previous methodologies. The controls put in place against the perception over crediting are viewed by Verra as critically important to the continued existence of REDD in the voluntary carbon market.</p> <p>3) Fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects.</p> <p>4) Agreed - Verra will work to ensure the fee structure is equitable. The use of a shared dataset is designed to level the playing field for small and large projects, and Verra believes it will facilitate more participation in the VCM, rather than push projects out.</p> <p>Explanation of original Verra Response: Verra affirms its original response, but provides point-by-point response to the original comment.</p> <p>Response to additional points raised by Aster: Spatial data creation costs has been a feature of every single VCS avoided deforestation methodology. Verra expects that by consolidating these activities into a single effort for a jurisdiction, costs of splitting one effort will be lower than each project undertaking their own effort. Verra does not guarantee cost savings for all project developers. It is not a requirement of the VCS Program that revised and new methodologies demonstrate cost savings over existing validated methodologies.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has determined that review of this comment by the assessment team is out of scope. This comment will not be reviewed and this finding is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>1) There will be fees for projects to receive the allocated activity data. Projects no longer have to bear costs of data generation, thus offsetting this new expense. Methodologies and modules do not customarily include information on Verra fees. Such information would be incorporated into separate application guidance, once the fee structure is finalized.</p> <p>2) The move to a jurisdictional nested approach was a foundational decision made by Verra three years ago and has been extensively communicated in numerous fora. Verra accepts that for individual projects, the baselines may now differ from what they were under previous methodologies. The controls put in place against the perception over crediting are viewed by Verra as critically important to the continued existence of REDD in the voluntary carbon market.</p> <p>3) Fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects.</p> <p>4) Agreed - Verra will work to ensure the fee structure is equitable. The use of a shared</p> |

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| | dataset is designed to level the playing field for small and large projects, and Verra believes it will facilitate more participation in the VCM, rather than push projects out. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 30 |
| Question | General |
| Section | 5 |
| Page (if relevant) | 6-7 |
| Line (if relevant) | Introduction |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | We suggest revising the order of the steps in figure 1. The graphic shows that ""PP contracts project validation of PD (including Allocation tool (AT) output). It is not clear why validating AT, at this stage again, is the idea that the PP will request for auditing a product that a service provider of Verra did or is going to do? It seems more logical that the AT for the project is validated by VERRA previously. |
| Verra Response | See #14 |
| Aster Global Assessment | Revisions to the module have resulted in the AD being assessed by an independent expert rather than a VVB; this cost is part of the AD allocation fee and not an additional cost for validation by a VVB. The response by Verra is sufficient. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | See #14 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 31 |
| Question | General |
| Section | 5 |
| Page (if relevant) | 6-7 |
| Line (if relevant) | Introduction |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general | As stated below: "Verra may choose to contract third-party service providers to develop activity data, map products, and manage application of the JNR-AT and JNR-RMT on its behalf. The selection of such providers is at the sole discretion of Verra". It would be good to add a description on how Verra is going to ensure transparency in |

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| questions & comments | the process, including what checks and balances will be in place to oversee decisions made by Verra |
| Verra Response | Verra will publicly publish all RFPs for data service providers, including qualifying criteria and the criteria by which proposals will be assessed. |
| Aster Global Assessment | The assessment team has deemed this response to sufficiently address the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | See #15 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 32 |
| Question | General |
| Section | 5 |
| Page (if relevant) | 6-7 |
| Line (if relevant) | Introduction |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>On the “responsibilities of Project Proponent related to J-ADB-UD”:</p> <p>a. PP has the option to submit forest cover benchmark maps (FCBM), it will good to specify if this forest benchmark is over the proposed jurisdiction or just for the project area.</p> <p>b. According to the webinars held by VERRA, this is not yet clear, but it seems that the cost will be divided among project proponents. However, what if only one project is proposed within a given jurisdiction for a long time period?</p> <p>c. Will there be reimbursements to the PP that originally paid to produce the activity data and risk maps?</p> <p>d. Contracting Project Validation including allocated AD from JNR-AT.</p> <p>e. We also suggest revising the procedures and step, as mentioned before when commented of the steps of figure 1.</p> <p>f. We think this step as is shown in the figure, could create uncertainty to the project proponent because the product (risk map and allocation) as it was done by another party hired by VERRA. So, does this mean that the PP is performing its own internal auditing to ensure that those products were produced and perform well and then must wait for the VVB to do this during the validation? What if it does not pass the approval?</p> |
| Verra Response | <p>a) This process is set out in current AUDef Appendix 3 A3.3.4 and VT000X Unplanned Deforestation Risk Modeling and Mapping Procedure (UDef-RP). It will occur every six years.</p> <p>b) We acknowledge that we could generate bottlenecks and are committed to doing our best to avoid them. PPs are welcome to apply to be data service providers or to submit supplementary materials for consideration by data service providers. However, AD collection, risk mapping and allocation need to be done at the jurisdictional level for the AUDef module to work.</p> |

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| | <p>c) a. Project proponents may submit jurisdictional- or project-level FCBMs (see AUDef Appendix 4)</p> <p>b. This is being developed and will be communicated. No reimbursement will be provided to stakeholders that submit supplemental materials</p> <p>c. Allocations will be assessed by an independent expert before being given to projects. Clarifications will be addressed on a project by project basis. The Verra Complaints and Appeals Policy (https://verra.org/programs/complaints-and-appeals-policy/) is available in case of any disagreement.</p> <p>d) There is no question here</p> <p>e) This figure no longer exists</p> <p>f) "</p> |
| <p>Aster Global Assessment</p> | <p>a) A3.3.4 discusses stakeholder contribution to jurisdictional products; this comment was asking whether PP's have the option of either developing an FCBM for the project area, leakage belt or entire jurisdiction.</p> <p>b) This comment is not directly addressed. The comment was asking if there is a cost share borne by PPs. Please describe the fee structure.</p> <p>c) a. The assessment team understands that FCBMs may be produced by PPs and they encompass the project area and leakage belt but not the jurisdiction. This response leads to the same confusion expressed by the comment in a).</p> <p>b. Verra states no reimbursement for supplemental materials but this comment is in regards to the AD allocation Report and whether that can be reimbursed.</p> <p>d) Assessment team agrees this does not require a response.</p> <p>e) The assessment team acknowledges the revision has made this comment moot.</p> <p>f) Verra has not provided a response.</p> |
| <p>Aster Global Initial Findings</p> | <p>CL: Please address the sub-comments a), b), c) and f).</p> |
| <p>Round 1 Response from Methodology Developer</p> | <p>Revised Verra comment addressing original public comment:</p> <p>a) As described in Appendix 4, Step 1, project proponents may submit FCBM's encompassing the PA and LB. Such maps will be accuracy assessed and incorporated where they are more accurate than the jurisdictional FCMB. Project proponents may additionally submit jurisdictional FCBMs for review by the data service provider, however it is not expected that such maps will be automatically incorporated as the FCBMj.</p> <p>b) The cost structure is not yet finalized and cannot therefore be detailed. Yes, there will be a cost-sharing by all PPs in a jurisdiction. Verra will prioritize a cost structure that equitably distributes costs within each jurisdiction and in a way that doesn't burden projects.</p> <p>c) At the time of the original comment, Verra was considering allowing project proponents to develop jurisdictional datasets. This is no longer the case. Verra does not expect to reimburse project proponents for data creation that was not contracted through Verra's process for engaging with 3rd party data developers, as such data will not be applicable to the methodology.</p> <p>d) Unclear what the proposal in this comment is.</p> <p>e) This figure no longer exists</p> <p>f) Approval of the AD is not the responsibility of the PP. Once baseline data has been allocated to a project, the PP can have the confidence to use this data. AD, once allocated to a project, does not require further validation.</p> <p>Explanation of original Verra Response: Original comment revised for clarity and to be reflective of current draft of methodology</p> <p>Response to additional points raised by Aster: C.b : The original comment C is not in relation to the AD allocation report, but it regards reimbursement for development of jurisdictional AD by a PP. Because development</p> |

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| | of the official jurisdictional data by PPs is not permitted, there is no issue of reimbursement. |
| Aster Global Findings Round 2 | <p>a). The methodology developer's revised response now sufficiently addresses this portion of the comment.</p> <p>b) The assessment team understands that cost details cannot be shared as they are not finalized, but additional clarification regarding the equitable distribution of cost is sufficient to address this portion of the comment.</p> <p>c) The methodology developer has clarified that project proponents will not be reimbursed for development of data. This item is addressed.</p> <p>d) The assessment team has already determined no response is required here.</p> <p>e) This item has been addressed.</p> <p>f). The methodology developer has clarified that allocated AD can be used once provided and does not require further validation.</p> <p>The assessment team determined that this comment has been addressed in full.</p> |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>a) As described in Appendix 4, Step 1, project proponents may submit FCBM's encompassing the PA and LB. Such maps will be accuracy assessed and incorporated where they are more accurate than the jurisdictional FCMB. Project proponents may additionally submit jurisdictional FCBMs for review by the data service provider, however it is not expected that such maps will be automatically incorporated as the FCBMj.</p> <p>b) The cost structure is not yet finalized and cannot therefore be detailed. Yes, there will be cost-sharing by all PPs in a jurisdiction. Verra will prioritize a cost structure that equitably distributes costs within each jurisdiction and in a way that doesn't burden projects.</p> <p>c) At the time of the original comment, Verra was considering allowing project proponents to develop jurisdictional datasets. This is no longer the case. Verra does not expect to reimburse project proponents for data creation that was not contracted through Verra's process for engaging with 3rd party data developers, as such data will not be applicable to the methodology.</p> <p>d) Unclear what the proposal in this comment is.</p> <p>e) This figure no longer exists</p> <p>f) Approval of the AD is not the responsibility of the PP. Once baseline data has been allocated to a project, the PP can have the confidence to use this data. AD, once allocated to a project, does not require further validation.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 33 |
| Question | General |
| Section | 5 |
| Page (if relevant) | 6-7 |
| Line (if relevant) | Introduction |
| Reviewer Organization | The Nature Conservancy (TNC) |

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| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>On “Other responsibilities of the Project Proponent”:</p> <p>a. Development of project-area-specific Emission Factors (EFs) using an applicable Methodology.</p> <p>i. If exists, it is important to clarify if projects can use EFs used for a country to prepare national or subnational REDD+ FREL, especially if already submitted to the UNFCCC and used as part of national GHG inventories. Recurring to the FREL is critical in order to be aligned with the national data,</p> <p>ii. In the webinar it was mentioned that the project could follow national data only if the FREL it is registered into Verra system and approved by a VVB. Does this mean that countries will need to register the FREL before being used by stand-alone projects?</p> |
| Verra Response | FRELS will be considered in the collection of AD as long as the AD used to create them is available and meets VCS requirements |
| Aster Global Assessment | It is unclear, based on Verra's response, and Table 17 in appendix 4, if DSPs, should, may, or must use FRELS not registered with Verra. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: If a jurisdiction has a registered FREL under the JNR it must be used . Otherwise the only relevant baseline and allocation will be derived by Verra (potentially using or adapting an existing FREL). See section 2 summary description of the module.</p> <p>Explanation of original Verra Response: Original response is correct, but is in relation to FRELS that are not registered with JNR.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | The methodology developer's revised response includes additional details sufficient to close the identified finding. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | If a jurisdiction has a registered FREL under the JNR it must be used. Otherwise the only relevant baseline and allocation will be derived by Verra (potentially using or adapting an existing FREL). See Section 2–summary description of the module of AUDef. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 34 |
| Question | General |
| Section | 5.1 |
| Page (if relevant) | 7 |
| Line (if relevant) | N/A |

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| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | The information from bullets 1 to 7, will this project information requirement be part of the template to be provided by VERRA? |
| Verra Response | Yes, as currently set out in <i>AUDef</i> Appendix 1 A1.4.3 Step 3 and Appendix 3 A3.3.1. |
| Aster Global Assessment | The assessment team has affirmed this information is in the current revision. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Yes, as currently set out in <i>AUDef</i> Appendix 1 A1.4.3 Step 3 and Appendix 3 A3.3.1. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 35 |
| Question | General |
| Section | 5.3 |
| Page (if relevant) | 8 |
| Line (if relevant) | 3-5 |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | On alternative risk mapping approaches - This is an important process that needs to be considered urgently, some PP are working with governments to develop Jurisdictional Risk maps and reconciliation of maps would benefit all PP and facilitate the nesting process. |
| Verra Response | The procedure will be set out clearly in <i>UDef-RP</i> |
| Aster Global Assessment | The assessment team is unable to corroborate this response as the assessment team has not received <i>Udef-RP</i> |
| Aster Global Initial Findings | CL: Please provide <i>Udef-RP</i> |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The procedure will be set out clearly in <i>UDef-RP</i></p> <p>Explanation of original Verra affirms the Verra original Response: response.</p> |

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| | Response to additional points raised by Aster: Verra has shared the Udef-RP |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | This comment relates to the Unplanned Deforestation Risk Modeling and Mapping Procedure (UDef-RP). Verra has stated UDef-RP is out of scope within the assessment of the Methodology and AUDef module. The Assessment Team acknowledges that UDef-RP falls beyond the scope of the assessment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The procedure will be set out clearly in UDef-RP VT0007 UDef-RAT |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 36 |
| Question | General |
| Section | 5.3 |
| Page (if relevant) | 8 |
| Line (if relevant) | Bullet 1 |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | "FCBMs cannot be submitted to Verra to adjust Deforestation Risk Maps during a J-ADB-UD Validity Period" - This kind of contradicts the sentence above that using FCBMs will be included to improve accuracy. |
| Verra Response | Project-level FCBMs may be submitted at any time but will only affect the jurisdictional risk map when it is developed prior to the beginning of a new baseline validity period. |
| Aster Global Assessment | The assessment team understands it would be infeasible to have a 'dynamic' baseline that iteratively is updated upon new project level FCBMs. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Project-level FCBMs may be submitted at any time but will only affect the jurisdictional risk map when it is developed prior to the beginning of a new baseline validity period. |

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| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 37 |
| Question | General |
| Section | 5.3 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | When will Verra set up the process to periodically consider alternative risk mapping approaches submitted by Project Proponents or other stakeholders. Would it be every 6 years? |
| Verra Response | This process is set out in current <i>AUDef</i> Appendix 3 A3.3.4 and <i>VT000X Unplanned Deforestation Risk Modeling and Mapping Procedure (UDef-RP)</i> . It will occur every six years. |
| Aster Global Assessment | The assessment team's review of the module corroborates this response; Verra has sufficiently addressed the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | See #19 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 38 |
| Question | General |
| Section | 5.3 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | It is a good idea to allow PPs to have the option of creating FCBMs for the Project Area and the Leakage Belt for submission to and consideration by Verra. In the case that a PP shows higher accuracy of the project map produce, then project level maps shall be integrated into the jurisdictional FCBMs, in this sense, how will different techniques (Jurisdiction of service providers and PP) be matched? |

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| Verra Response | This is defined in current <i>AUDef</i> Appendix 1 A1.4.3 |
| Aster Global Assessment | Appendix A1.4.3 states "• An FCBMp meeting conditions i) and ii) must be incorporated directly into the FCBMj by replacing any mapped values with those depicted on the FCBMp" and "Projects wishing to submit FCBMp after a jurisdictional FCBM has been validated must wait until the commencement of data development for the subsequent BVP." Where project-level FCBMs replace overlapping FCBMj's, is that replacement only for the subsequent BVP and no further BVPs? |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: This is defined in current <i>AUDef</i> Appendix 1 A1.4.3. Where project level FCBMs (FCBMp) replace overlapping FCBMj's that replacement is only for the current BVP, and only for the extent of the FCBMp. In future BVPs the PP could submit a new FCBM for consideration by the DSP. The only metric that matters in the selection of FCBMp's is their ability to out-perform the FCBMj in accuracy. Regardless of the remote sensing approach used to develop those competing maps, the maps are presented in the same FCBM format for comparison. Explanation of original Verra Response: Original response is correct, but additional clarity is added. Response to additional points raised by Aster: Yes it is only for the next BVP, not future ones beyond it. |
| Aster Global Findings Round 2 | The methodology developer has provided clarification directly addressing the assessment team's request for clarification. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | This is defined in current <i>AUDef</i> Appendix 1 A1.4.3. Where project level FCBMs (FCBMp) replace overlapping FCBMj's that replacement is only for the current BVP, and only for the extent of the FCBMp. In future BVPs the PP could submit a new FCBM for consideration by the DSP. The only metric that matters in the selection of FCBMp's is their ability to out-perform the FCBMj in accuracy. Regardless of the remote sensing approach used to develop those competing maps, the maps are presented in the same FCBM format for comparison. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 39 |
| Question | General |
| Section | 5.4 |
| Page (if relevant) | 9 |
| Line (if relevant) | 8-11 |
| Reviewer Organization | The Nature Conservancy (TNC) |

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| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>Contracting a VVB to validate the boundaries of the Project Area and Leakage Belt might not even be practical - without the baseline allocated, it is not possible to know if it is a viable carbon project, and therefore contracting a VVB at that early stage might be a waste of limited resources.</p> <p>Accordingly, Verra should accommodate the possibility of having revisions along the way. Carbon project design has not been perfect since day one and changes will occur along the way. Maybe Verra could charge some sort of additional small fee, but it should not be one single shot.</p> |
| Verra Response | VVBs do not have to validate the boundaries in stages - see current <i>AUDef</i> Appendix 3 Figure 6 |
| Aster Global Assessment | The assessment team's review of the Module corroborates this response. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | VVBs do not have to validate the boundaries in stages - see current <i>AUDef</i> Appendix 3 Figure 6 and Figure 7 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 40 |
| Question | General |
| Section | 5.4 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Doing validation in stages is an additional cost to project proponent, especially considering that boundary validation is usually done on site. |
| Verra Response | VVBs do not have to validate the boundaries in stages - see current <i>AUDef</i> Appendix 3 Figure 6 |
| Aster Global Assessment | The assessment team's review of the Module corroborates this response. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra | See #39 |

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| Response October 2023 | |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 41 |
| Question | General |
| Section | 5.5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | It would be important to add a more detailed description that allows a better understanding on how the integration of ARR will be reflected under this approach. Our understanding is that the in the allocation tool there is space to fill up forest enhancement, but we are not sure how it would work. Additionally, for removals such as ARR, projects must apply specific VCS methodologies which are not included in these modules. |
| Verra Response | ARR is entirely separate and would not overlap with AUD as the areas subject to (and allowable for ARR) must have been non-forest (in reality, no in a baseline scenario) for a longer period of time. In other words, if you are reforesting non-forest land, this will be accounted for separately. If the question relates to re-growth and removals foregone, i.e. regeneration of degraded forest that would have been deforested in the baseline, this can be accounted for as usual under the AUD methodologies - as and when regrowth is demonstrated in areas expected to be deforested. |
| Aster Global Assessment | The methodology developer took due account by directly answering the question posed by the commenter. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | See #22 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 42 |
| Question | General |
| Section | 6 |
| Page (if relevant) | 10 |
| Line (if relevant) | Bullet 2 |
| Reviewer Organization | The Nature Conservancy (TNC) |

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| Reviewer Country | USA |
| Response(s) - including general questions & comments | Further clarification is needed. Is the deforestation risk map for the entire jurisdictional or only for the project and leakage belt area? |
| Verra Response | The deforestation risk map is for the entire jurisdiction |
| Aster Global Assessment | The methodology developer took due account by directly answering the question posed by the commenter. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The deforestation risk map is for the entire jurisdiction |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 43 |
| Question | General |
| Section | Appendix 1 |
| Page (if relevant) | 11 |
| Line (if relevant) | Figure |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | GIS consideration - Considering that the activity data is not spatially explicit, would be possible to calculate activity data per forest stratum? |
| Verra Response | Yes, see procedures in current <i>AUDef</i> Appendix 1 |
| Aster Global Assessment | The methodology developer took due account by confirming the question posed by the commenter is assessed in Appendix 1 of the current version of the methodology. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Yes, see procedures in current <i>AUDef</i> Appendix 1 |
| Aster Global Assessment | The assessment team confirmed that no changes were made to the initial response. No further review is required. |

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| of Revised Response | |
| Comment # | 45 |
| Question | 1 |
| Section | General |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Wildlife Conservation Society (WCS) |
| Reviewer Country | Rwanda |
| Response(s) - including general questions & comments | In the short term, we encourage flexibility and adaptability, this would include allowing project developers to comply with the requirements of a third party, but for this work to be contracted directly by a project developer or country government |
| Verra Response | Project developers are welcome to apply as data providers. Verra might chose to select (or not) a given project developer based on their experience. See current AUDef Appendix 4. |
| Aster Global Assessment | The assessment team finds this response addresses the original comment and is congruent with Appendices in the module. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | significant change |
| Revised Verra Response October 2023 | Project proponents are not permitted as DSPs. They can contribute data per AUDef Appendix 4. Project developers are welcome to apply as data providers. Verra might chose to select (or not) a given project developer based on their experience. See current AUDef Appendix 4. |
| Aster Global Assessment of Revised Response | The assessment team notes that significant changes were made in the revised response. However, these changes do not affect the assessment team's initial review and thus no further review is warranted. |

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| Comment # | 46 |
| Question | General |
| Section | Module J-ADB-UD, v1.0 |
| Page (if relevant) | 8 |
| Line (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Reviewer Country | Zambia |
| Response(s) - including general questions & comments | Will the PP have any input to the choice of LCT classes within each AD category? This will be important because we will be collecting our own EF data per class. |

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| Verra Response | Data service providers acting on behalf of Verra will define all LCTs. DSPs can be project proponents. |
| Aster Global Assessment | The methodology developer took due account by clarifying that DSPs acting on behalf of Verra will define all LCTs, in direct response to the posed question. This item is addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | significant change |
| Revised Verra Response October 2023 | Data service providers acting on behalf of Verra will define all LCTs. DSPs may not can be project proponents. |
| Aster Global Assessment of Revised Response | The assessment team notes that significant changes were made in the revised response. However, these changes do not affect the assessment team's initial review and thus no further review is warranted. |
| Comment # | 47 |
| Question | General |
| Section | Module J-ADB-UD, v1.0 |
| Page (if relevant) | 9 |
| Line (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Reviewer Country | Zambia |
| Response(s) - including general questions & comments | Will the AD provider always choose a third level administrative unit as the JNR boundary if the second level unit is greater than 5 million ha? Does the national authority have any input to the choice of boundary? And if so what if the national authority chooses a boundary of greater than 5 million ha – can the PP request a smaller JNR boundary? |
| Verra Response | Verra will define all reference regions, in consultation with governments, existing REDD programs, project proponents, and may utilize definitions based on administrative units, or geographic factors such as ecosystems, or watersheds |
| Aster Global Assessment | Per Appendix 4, Table 17, of the AUD module-- and in response to this comment directly--Verra has stated Verra will define jurisdictions, not data service providers. The assessment team deemed Verra's response as sufficient. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Verra will define all reference regions, in consultation with governments, existing REDD programs, project proponents, and may utilize definitions based on administrative units, or geographic factors such as ecosystems, or watersheds |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 48 |
| Question | General |

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| Section | Module J-ADB-UD, v1.0 |
| Page (if relevant) | 13 |
| Line (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Reviewer Country | Zambia |
| Response(s) - including general questions & comments | As with the choice of LCT classes, will the PP have any input to the land cover map used for generating the stratified sampling design? How will Verra approach the situation that this map contains classes that do not agree with a stratified FCBM provided by the PP? We note that the map used will have a significant impact on the estimated confidence of the AD results, hence the potential confidence deduction, and feel it is unfair and inefficient to not allow the PP input at this stage. |
| Verra Response | If a project-scale FCBM is shown to provide a substantially more accurate estimate than the jurisdictional FCBM, the project FCBM must replace the intersecting portion(s) of the jurisdictional FCBM. The section that addresses this (Appendix 1, A1.4.1 Step 1) has been enhanced to provide clarity around the criteria that a project-level FCBM must meet in order to be incorporated into the jurisdictional FCBM. |
| Aster Global Assessment | The assessment team deems this response to be sufficient. Appendix 1 A1.4.3 Step 1 states "• Where the FCBMp is shown to provide substantially more accurate estimates of the two main classes (area of deforestation over the HRP and area of forest at the end of HRP) than the jurisdictional FCBM, the FCBMp must replace the portions of the jurisdictional FCBM with which it intersects. " |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | If a project-scale FCBM is shown to provide a substantially more accurate estimate than the jurisdictional FCBM, the project FCBM must replace the intersecting portion(s) of the jurisdictional FCBM. The section that addresses this (Appendix 1, A1.4.1 Step 1) has been enhanced to provide clarity around the criteria that a project-level FCBM must meet in order to be incorporated into the jurisdictional FCBM. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 49 |
| Question | General |
| Section | Module J-ADB-UD, v1.0 |
| Page (if relevant) | 14 |
| Line (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Reviewer Country | Zambia |

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| Response(s) - including general questions & comments | We suspect that the interpretation of LCT through high resolution imagery will introduce significant error to AD analysis. Our experience is that even experienced remote sensing analysts are not always able to detect LCT through imagery alone, and that first-hand knowledge of what the LCT looks like on the ground, at the same location and seasonal stage, is necessary to ensure imagery is correctly interpreted. This is particularly important in dryland forests, where significantly fewer studies concerning the accuracy of this method have been conducted, and seasonal, and inter annual differences have a large impact on the visual interpretation of imagery. In addition, PPs who conduct extensive field studies to determine the feasibility of potential AUD project activities through analysis of the drivers and agents of deforestation particular to a specific area, will often have field data and experience that far exceeds that of remote sensing experts from other regions. It seems inefficient not to allow these PPs to determine and implement the best possible sampling and response designs themselves. In addition, we would suggest some sort of accuracy assessment it carried out on the interpretation of imagery, using field data. |
| Verra Response | Project proponents may serve as data service providers and are encouraged to submit supplemental information to aid the data service provider (Appendix 4). FCBMs are subject to accuracy assessment (Appendix 1 A1.4.3.Step 1). |
| Aster Global Assessment | The assessment team deems this response to be sufficient. Appendix 1 A1.4.3 allows for the project to submit it's own FCBM for the project area and leakage belt, provided it exceed the accuracy of that jurisdictional FCBM produced by Verra. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | significant change |
| Revised Verra Response October 2023 | Project proponents may not serve as data service providers. PPs and are encouraged to submit supplemental information to aid the data service provider (Appendix 4). FCBMs are subject to accuracy assessment (Appendix 1 A1.4.3.Step 1). |
| Comment # | 50 |
| Question | General |
| Section | Module J-ADB-UD, v1.0 |
| Page (if relevant) | 15 |
| Line (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Reviewer Country | Zambia |
| Response(s) - including general questions & comments | The criteria described for identifying planned deforestation through imagery raise multiple concerns. Patterns of clearing (e.g. geometric shapes that indicate professional land survey techniques were employed) do not mean that clearing was planned. The production of certain commodities also does not mean that clearing was planned. More importantly, the actual definition of planned vs unplanned deforestation is ambiguous and is unlikely to be consistent across jurisdictions. This could introduce unintended consequences, particularly leakage into neighboring jurisdictions where national planning and policing differs. |
| Verra Response | See #88 |
| Aster Global Assessment | #88 refers to the definition of the historical reference period. The assessment team is unsure how that is germane to this comment. |

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| Aster Global Initial Findings | CL: Please directly address original comment. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Text has been edited since the version on which these comments were made. The methodology does not now create its own definition of planned deforestation. Where planned deforestation is used in identified exclusions this is done based on a minimum area deforested in a short period of time clearly indicating a systematic overtly or in overtly sanctioned deforestation which is the form of deforestation that risk mapping is unlikely to accurately capture.</p> <p>Explanation of original Verra Response: Original response mistakenly cross-referenced an incorrect response</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | <p>The assessment team notes that the methodology does not create its own definition of planned deforestation, but rather uses the definition identified in the VCS Methodology Requirements. Clarification is provided regarding what constitutes planned deforestation in identifying exclusions.</p> <p>This item is related to item 377.05 (Row 96) of the "General Q & A" tab. Since the developer will address it there, this comment can be considered addressed herein.</p> |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>Text has been edited since the version on which these comments were made. The methodology does not now create its own definition of planned deforestation.</p> <p>Where planned deforestation is used in identified exclusions this is done based on a minimum area deforested in a short period of time clearly indicating a systematic overtly or in overtly sanctioned deforestation which is the form of deforestation that risk mapping is unlikely to accurately capture. (See also comment #377.05.)</p> |
| Comment # | 51 |
| Question | 2 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Biofilica Ambipar Environment; NBS Brazil Alliance & Carbonext |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | <p>The jurisdictional territories in the Amazon, even the smallest of them - the municipality - are quite extensive. Sometimes even bigger than European countries. This means that there are different deforestation patterns within the same municipal boundary, caused by very different economic drives, and social dynamics in each part. The development of jurisdictional risk maps necessarily needs to be able to capture these local nuances, as they are most responsible for the dynamics of land use change. Over-generalizing risk maps will make areas that really need a lot of resources to be conserved to produce little and vice versa. Local effects are key to understanding the</p> |

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| | dynamics of deforestation and identifying places with greater or lesser risk of forest conversion. |
| Verra Response | Revisions to UDef-RP will be forthcoming. |
| Aster Global Assessment | The assessment team is unable to determine whether or not the developer has taken due account of this comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. |
| Aster Global Initial Findings | CL: Please address in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Please see the procedures in VT0008 (Udef-RP), and VT0007 (Udef-AP). This fine level variation is considered. Under the Udef-RP, it is allowable for alternative risk maps to be developed if they can be shown to achieve a higher accuracy than a benchmark approach. Project proponents will not be allowed to develop the official jurisdictional risk map, but they can develop maps and models and submit them for review by the data service provider (See appendix 4)</p> <p>Explanation of original Verra Response: Verra affirms that questions about the risk mapping tool are generally out of scope as this module does not produce a risk map.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | <p>As stated in Udef-RP, the assessment team confirmed that development of alternative risk map by project proponents is allowed if it can be shown to achieve higher accuracy than benchmark approach.</p> <p>However, the assessment team acknowledges this comment relates to the Unplanned Deforestation Risk Modeling and Mapping Procedure (UDef-RP) which falls beyond the scope of the assessment.</p> |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>Please see the procedures in VT0007 8 (Udef-RP), and VT0007 (Udef-AP). This fine level variation is considered.</p> <p>Under VT0007 the Udef-RP, it is allowable for alternative risk maps to be developed if they can be shown to achieve a higher accuracy than a benchmark approach. Project proponents will not be allowed to develop the official jurisdictional risk map, but they can develop maps and models and submit them for review by the data service provider (See appendix 4).</p> |
| Comment # | 52 |
| Question | 3 |
| Section | 6 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Biofilica Ambipar Environment; NBS Brazil Alliance & Carbonext |

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| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | <p>Mapbiomas (http://www.mapbiomas.org) and Prodes (http://terrabrasilis.dpi.inpe.br/downloads/).</p> <p>National sources such as Mapbiomas and Prodes pay attention to these criteria and therefore have been widely adopted for the development of REDD projects throughout Brazil. We view with caution if there is a need to produce our own FCBMs for new projects because they will make the value of project development too expensive, and at the same time, they will no longer have guarantees of higher quality and accuracy. Brazil has historical and clear difficulties of consistent systematic mapping, especially in the Amazon region. Monitoring the dynamics of land use change in a region that is in constant transformation is extremely costly. Initiatives such as Mapbiomas changed this history substantially. With the use of advanced technology, it is able to quickly map the land use of Brazil through methods that adhere to the requirements of VERRA standards (high accuracy, validation with high resolution images, high availability and free of charge).</p> <p>Wall-to-wall mapping can produce better estimates of land cover (change) areas than sampling, depending on the method used. For example, in the reference below we've demonstrated that using the inclusion probabilities of a Random Forest Classifier for estimating land cover class areas resulted in estimates that were within the confidence bounds of sampling-based estimates of higher size sample size (i.e. they are more statistically efficient). (DOI: 10.1109/TGRS.2021.3080083)</p> |
| Verra Response | <p>Wall to wall, or any other spatial data type may be used in following ways described throughout the module: 1) To develop a stratification approach to image sampling 2) to develop a project-specific forest cover benchmark map 3) to supplement and aid analysts in visual interpretation of high resolution imagery. Project proponents may always generate land cover maps to any standard desired to support their own implementation of emission reduction activities. Following best practices outlined in "GFOI Integration of remote-sensing and ground-based observations for estimation of emissions and removals of greenhouse gases in forests," section 4.2, the estimate of deforestation area from a map must be adjusted using accuracy point samples. In Appendix 1, highly accurate land cover change maps can be used to define sampling strata for the point samples, and doing so will substantially reduce effort and improve precision. Projects can furthermore make project-specific FCBMs and submit them for comparison to the jurisdictional FCBM.</p> |
| Aster Global Assessment | <p>The assessment team deems this response to be sufficient. Verra has clarified that projects may make FCBMp and submit these; if deemed more accurate (as defined by A1.4.3.) these may be used. The assessment team finds this statement is in agreement with supplemental text found in Appendices of the module.</p> |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>Wall to wall, or any other spatial data type may be used in following ways described throughout the module: 1) To develop a stratification approach to image sampling 2) to develop a project-specific forest cover benchmark map 3) to supplement and aid analysts in visual interpretation of high resolution imagery. Project proponents may always generate land cover maps to any standard desired to support their own implementation of emission reduction activities. Following best practices outlined in "GFOI Integration of remote-sensing and ground-based observations for estimation of emissions and removals of greenhouse gases in forests," section 4.2, the estimate of deforestation area from a map must be adjusted using accuracy point samples. In <i>AUDef</i> Appendix 1, highly accurate land cover change maps can be used to define sampling strata for the point samples, and doing</p> |

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| | so will substantially reduce effort and improve precision. Projects can furthermore make project-specific FCBMs and submit them for comparison to the jurisdictional FCBM. |
| Comment # | 53 |
| Question | General |
| Section | J-ADB-UD |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Biofilica Ambipar Environment & NBS Brazil Alliance |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | Would it be possible that Proponents create their own AD, given the fact that it will be audited by a VVB? Why does it need to be developed by VERRA 3rd party Consultant? On the other hand, if a VERRA consultant develops the AD for a project why does it needs to be validated by a VVB, isn't it enough that a Certified VERRA Consultant has developed it? |
| Proposed Change(s) | Consider the possibility that qualified project proponents create their own AD and that it's validated by a VVB, otherwise remove the need of VVB validation when a VERRA certified consultant has provided the AD |
| Verra Response | Project proponents can submit proposals to be data service providers or submit supplemental information (per Appendix 4). VVBs will not need to review the AD allocated to projects. |
| Aster Global Assessment | The assessment team deems this response to be sufficient. Verra has clarified that VVBs do not assess AD, and that projects can submit supplemental data. The assessment team finds this statement is in agreement with supplemental text found in Appendices of the module. However, A3.3.2 states "The process of developing AD for each jurisdiction must be documented in the description report for the purpose of validation by a Verra-contracted VVB." and the assessment team finds this to be contradictory. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: 1)Project proponents can submit proposals to be data service providers or submit supplemental information (per Appendix 4). 2)There is no validation of baseline AD by VVB</p> <p>Explanation of original Verra reaffirms the Verra original Response: response.</p> <p>Response to additional points raised by Aster: This text was an error and has been corrected.</p> |
| Aster Global Findings Round 2 | The assessment team confirmed the correction of the conflicting text. The developer of the methodology provided additional clarification that the VVB won't be required to assess allocated AD for the projects, and projects are allowed to submit supplementary data. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |

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| Revised Verra Response October 2023 | 1) Project proponents can submit proposals to be data service providers or submit supplemental information (per AUDef Appendix 4). 2) There is no validation of baseline AD by VVB |
| Comment # | 54 |
| Question | General |
| Section | 5.5.3 |
| Page (if relevant) | 26 |
| Line (if relevant) | N/A |
| Reviewer Organization | Biofilica Ambipar Environment & NBS Brazil Alliance |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | Integrating FCBMp into FCBMj - the Significantly more accurate definition doesn't make sense. If the FCBMj aggregate accuracy has to be at least 90%, how is that possible that a "significantly more accurate" FCBMp should be higher by at least 10%. FCBMp accuracy will never be at least 10% higher than FCBMj if the latter needs to be at least 90%. |
| Proposed Change(s) | We propose a change of the definition of "significantly more accurate" to reduce the overall accuracy to 4 to 5%, and the Kappa coefficient to 2.5%. |
| Verra Response | The FCBMp is evaluated on accuracy of Forest class, but the comparison between FCBMp and FCBMj is based on the Deforestation class, hence the different accuracy thresholds adopted (Appendix 1 A1.4.3 Step 1) |
| Aster Global Assessment | The assessment team deems this response to be sufficient. This clarification from Verra is located in A.14.3 of the module. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The FCMB_p is evaluated on accuracy of Forest class, but the comparison between FCBM_p and FCBM_j is based on the Deforestation class, hence the different accuracy thresholds adopted (AUDef Appendix 1 A1.4.3 Step 1) |
| Comment # | 55 |
| Question | General |
| Section | 5.4 Geographic Boundaries |
| Page (if relevant) | pp.9-10 |
| Line (if relevant) | N/A |
| Reviewer Organization | Biofilica Ambipar Environment & NBS Brazil Alliance |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | How should "Multiple contiguous subnational administrative Jurisdictions of the same level" be matched? And what will be the effect of this on the calculation of avoided emissions? |
| Verra Response | Verra will define all jurisdictions at the highest reasonable level per current Appendix 1 A1.2.1 |

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| Aster Global Assessment | The assessment team is not able to fully determine whether this commenter's comment has been fully addressed as the referenced passage is no longer present in the initial draft assessed. However, assessment team notes, Verra's response has not addressed the latter question "what will be the effect of this on the calculation of avoided emissions?" |
| Aster Global Initial Findings | CL: Please address second part of comment. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Verra will define all jurisdictions at the highest reasonable level per current Appendix 1 A1.2.1</p> <p>Avoided emissions will always be accurately and/or conservatively calculated either within a single jurisdiction or across summed jurisdictions. A larger jurisdictional area will produce a higher estimate of historical activity data, but that AD will be allocated back to a larger jurisdiction, thus balancing out the effect of the size of the jurisdiction on a per-hectare basis. From a project perspective, the size of the jurisdiction is irrelevant once AD has been allocated to the PA and LB, as all further calculations and monitoring are done only with the PA and LB. It will, however, be rare for multiple jurisdictions to occur within a single country and will be reserved only for the very largest countries (note that Colombia and Tanzania for example are national level jurisdictions and to date only Brazil and DRC have been subdivided).</p> <p>Explanation of original Verra Response: Original response was accurate, but has been expanded upon.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | The methodology developer has provided additional explanation in their revised response that addresses the question raised in the Round 1 finding. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>Verra will define all jurisdictions at the highest reasonable level per current Appendix 1 A1.2.1</p> <p>Avoided emissions will always be accurately and/or conservatively calculated either within a single jurisdiction or across summed jurisdictions. A larger jurisdictional area will produce a higher estimate of historical activity data, but that AD will be allocated back to a larger jurisdiction, thus balancing out the effect of the size of the jurisdiction on a per-hectare basis. From a project perspective, the size of the jurisdiction is irrelevant once AD has been allocated to the PA and LB, as all further calculations and monitoring are done only with the PA and LB.</p> <p>It will, however, be rare for multiple jurisdictions to occur within a single country and will be reserved only for the very largest countries (note that Colombia and Tanzania for example are national level jurisdictions and to date only Brazil and DRC have been subdivided).</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 56 |

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| Question | General |
| Section | 5.4 |
| Page (if relevant) | pp.9-10 |
| Line (if relevant) | N/A |
| Reviewer Organization | Biofilica Ambipar Environment & NBS Brazil Alliance |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | "Activity data will be allocated to the respective portion of each Jurisdiction's AUD project area." How will the division of these jurisdictions in the project be distinguished? |
| Verra Response | The AUD project area will be submitted by projects using the <i>AD Baseline Allocation Request Form</i> (as currently set out in Appendix 3 A3.1 |
| Aster Global Assessment | The assessment team finds that Appendix 3 of the module explains how jurisdictional data is allocated to project areas. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The AUD project area will be submitted by projects using the AD Baseline Allocation Request Form (as currently set out in Appendix 3 A3.1 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 57 |
| Question | 2 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | During the consultation for the JNR Risk Mapping tool, we identified several issues and suggested changes to improve the methodology (e.g., statistical analysis for selection of the best risk map). Please refer to those documents for the tests conducted and evidence provided regarding these issues. Please also clarify the contradiction between the JNR Risk Mapping tool and the new Activity data model. The JNR Risk Mapping Tool states: "Users of the JNR Allocation Tool may create risk maps using the approach that they consider most appropriate... The risk map created with the alternative approach must be of similar or better quality than the best risk map produced with this JNR Risk Mapping Tool." |

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| | <p>The J-ADB-UD document, in contrast, states: "This module shall be applied exclusively by Verra or Verra-selected providers for the purpose of developing and allocating the Jurisdictional Activity Data Baseline for AUD projects. Project Proponents may utilize this module for informational purposes only."</p> <p>The former implies that the PP can produce its own risk map, including other factor maps (e.g., roads, demographics) directly related to the agents and drivers of deforestation; however,</p> |
| Verra Response | To be addressed through revisions to the <i>UDef-RP</i> and <i>UDef-AP</i> |
| Aster Global Assessment | The assessment team is unable to determine whether or not the developer has taken due account of this comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. |
| Aster Global Initial Findings | CL: Please address in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Note that the commenter is referring to an outdated version of the risk mapping tool. This contradiction no longer exists. "Users" of the risk mapping tool are understood to be those who are implementing it to produce the official datasets sanctioned by Verra.</p> <p>Explanation of original Verra Response: Original response correctly highlights this comment as out of scope for the AUDef module.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | The methodology developer clarified the updated version of the Udef-RP has addressed the public comment. Additionally, the methodology developer has stated this public comment is out of scope with the assessment of the Methodology and AUDef module. The assessment team acknowledges this comment relates to UDef-RP which falls beyond the scope of the assessment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The commenter is referring to an outdated version of the risk mapping tool. In VT0007, t This contradiction no longer exists. "Users" of the risk mapping tool are understood to be those who are implementing it to produce the official datasets sanctioned by Verra. |
| Comment # | 58 |
| Question | 3 |
| Section | 6 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |

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| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>"In its webinars, Verra representatives repeatedly justified the change to the sampling-based mechanism as resulting from best-available evidence from scientific studies. It must be noted, however, that such studies are not referenced in the methodology, and, therefore, Verra provides no basis on which to evaluate this claim. The sampling-based approach has some key advantages in terms of evaluating uncertainty and error, which, as we understand it, is what motivated Verra to make this change. There are also advantages in identifying lower-density forest types (e.g., woodlands, dry forest) where spectral similarity reduces the accuracy of land cover classifications performed using common multispectral datasets (e.g., Sentinel-2, Landsat), which is why a point-based approach is used in VM0009. However, it should be noted that there are many studies that achieve >90% overall accuracy on wall-to-wall maps; these studies should have been identified in the literature reviewed by Verra and contractors in preparing this methodology, can be found by a search of academic literature, and thus will not be mentioned here.</p> <p>Considerations: The quality of a sampling-based approach via visual inspection depends on the level of experience and of the person performing the analysis as well as that person's knowledge of the local context. The idea that one or two service providers would be performing all of these analyses exacerbates this issue, because they will be generating activity data for a wide range of forests and geographies and therefore will likely be unfamiliar with many local land covers. Furthermore, there should be consistency in terms of who should be performing the analysis – VM0009 suggests that the same person should interpret the points for all images to avoid introducing additional error by having multiple people interpret these data.</p> <p>Furthermore, the methodology as written does not mention any field data collection to ground-truth and validate what is being produced. Though the sampling-based approach includes equations to estimate uncertainty, this is based on standard error calculated using sample sizes and the area of the strata. The methodology has no method to evaluate the accuracy and error of the data produced, because there is no comparison of the activity data produced via image inspection with data that confirms the actual, on-the-ground land cover. In other words, there will be no indication as to whether the points were correctly identified. A wall-to-wall map, in contrast, is often evaluated using a confusion matrix to determine error based on the proportion of points that are incorrectly classified.</p> <p>Both methods have their advantages and disadvantages; a middle-ground approach may require sampling-based approaches for contexts where wall-to-wall maps perform poorly and vice-versa. Verra should also consider that the methodology, as it currently stands, requires a blend of wall-to-wall and sampling based approaches for the Forest Cover Benchmark Maps (FCBMs) and Activity Data (AD), respectively. Verra is not "moving away" from wall-to-wall approaches, rather, it is simply changing the role of this approach in the methodology. We would also like to see any potential issues that could result from this "mixed mapping" method of combining data produced by these two different approaches."</p> |
| Verra Response | <p>The shortcomings of estimating areas, particularly areas of change, by pixel counting on wall-to-wall maps constructed by classifying remote sensing data have been well identified in the scientific literature; such limitations include the frequent bias of the resulting estimates and the lack of an estimate of the uncertainty of the estimates. To address such shortcomings, the sample-based approach for estimating areas and areas of change from remote-sensing classifications has been advocated as a good-</p> |

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| | <p>practice. Key references describing such shortcomings and supporting the use of the sample-based approach as a good practice include: 1) Pontus Olofsson, Giles M. Foody, Martin Herold, Stephen V. Stehman, Curtis E. Woodcock, Michael A. Wulder, Good practices for estimating area and assessing accuracy of land change, Remote Sensing of Environment, Volume 148, 2014, Pages 42-57, ISSN 0034-4257, https://doi.org/10.1016/j.rse.2014.02.015. and 2) Olofsson, P. (2018) Accuracy and Area Estimation. In S. Liang (Ed.), Comprehensive Remote Sensing, vol. 6, pp. 128–135. Oxford: Elsevier</p> |
| Aster Global Assessment | <p>Verra has addressed the comment with regards to the sample-based approach. However, the assessment team finds this commenter, and others, have questioned whether ground-truthing of remotely sensed plots may aid in accuracy.</p> |
| Aster Global Initial Findings | <p>CL: Please address the comment with regards to use of ground-truthing to establish accuracy.</p> |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The methodology chooses to follow the best practice as advocated by GFOI, FAO and others. Estimates of area change based on pixel counting without undergoing bias-correction are not credible and overwhelming result in non-conservative estimates of area of change.</p> <p>High resolution imagery must be used wherever possible which will give as much information on tree cover as on the ground visits. Furthermore AD developers are permitted to use ground based data as a supplement as described in section A1.4.1 "Rules for determining the evidence and interpretation guidance that should be employed must be described in the SOP for image interpretation and may rely on a combination of imagery, secondary remote sensing data and ancillary spatial or non-spatial data."</p> <p>The shortcomings of estimating areas, particularly areas of change, by pixel counting on wall-to-wall maps constructed by classifying remote sensing data have been well identified in the scientific literature; such limitations include the frequent bias of the resulting estimates and the lack of an estimate of the uncertainty of the estimates. To address such shortcomings, the sample-based approach for estimating areas and areas of change from remote-sensing classifications has been advocated as a good-practice. Key references describing such shortcomings and supporting the use of the sample-based approach as a good practice include: 1) Pontus Olofsson, Giles M. Foody, Martin Herold, Stephen V. Stehman, Curtis E. Woodcock, Michael A. Wulder, Good practices for estimating area and assessing accuracy of land change, Remote Sensing of Environment, Volume 148, 2014, Pages 42-57, ISSN 0034-4257, https://doi.org/10.1016/j.rse.2014.02.015. and 2) Olofsson, P. (2018) Accuracy and Area Estimation. In S. Liang (Ed.), Comprehensive Remote Sensing, vol. 6, pp. 128–135. Oxford: Elsevier</p> <p>Explanation of original Verra Response: Original response was adequate.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | <p>The methodology developer clarified that AD developers are permitted to use ground-based data as a supplement. The assessment team confirmed the statement in section A1.4.1 "Rules for determining the evidence and interpretation guidance that should be employed must be described in the SOP for image interpretation and may rely on a combination of imagery, secondary remote sensing data and ancillary spatial or non-spatial data". Additionally, the assessment noted following in section A1.4.1/Data sources "Other data sources, such as airborne and spaceborne active and passive remote sensing, and ground observation, may also be used to</p> |

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| | <p>supplement the interpreters' observation of high-resolution imagery." which addresses the commenter's concern of methodology lacking information on field data collection for ground-truthing and validation. This item is closed.</p> |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>The methodology chooses to follow the best practice as advocated by GFOI, FAO and others. Estimates of area change based on pixel counting without undergoing bias-correction are not credible and overwhelming result in non-conservative estimates of area of change.</p> <p>High resolution imagery must be used wherever possible which will give as much information on tree cover as on the ground visits. Furthermore AD developers are permitted to use ground based data as a supplement as described in Section A1.4.1 "Rules for determining the evidence and interpretation guidance that should be employed must be described in the SOP for image interpretation and may rely on a combination of imagery, secondary remote sensing data and ancillary spatial or non-spatial data."</p> <p>The shortcomings of estimating areas, particularly areas of change, by pixel counting on wall-to-wall maps constructed by classifying remote sensing data have been well identified in the scientific literature; such limitations include the frequent bias of the resulting estimates and the lack of an estimate of the uncertainty of the estimates. To address such shortcomings, the sample-based approach for estimating areas and areas of change from remote-sensing classifications has been advocated as a good-practice. Key references describing such shortcomings and supporting the use of the sample-based approach as a good practice include: 1) Pontus Olofsson, Giles M. Foody, Martin Herold, Stephen V. Stehman, Curtis E. Woodcock, Michael A. Wulder, Good practices for estimating area and assessing accuracy of land change, Remote Sensing of Environment, Volume 148, 2014, Pages 42-57, ISSN 0034-4257, https://doi.org/10.1016/j.rse.2014.02.015. and 2) Olofsson, P. (2018) Accuracy and Area Estimation. In S. Liang (Ed.), Comprehensive Remote Sensing, vol. 6, pp. 128–135. Oxford: Elsevier.</p> |
| Aster Global Assessment of Revised Response | <p>The assessment team confirmed that no changes were made to the initial response. No further review is required.</p> |
| Comment # | 59 |
| Question | General |
| Section | 3.1 DEFINITIONS |
| Page (if relevant) | 3 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>There are new definitions and acronyms in these modules that are absent from the VCS definitions document.</p> |

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| Proposed Change(s) | New definitions should be included in VCS definitions document as well. |
| Verra Response | Some definitions in the <i>VCS Program Definitions</i> have been modified, but definitions related only to this methodology or module will stay with it. |
| Aster Global Assessment | The Methodology Template requires methodologies to define all key terms and acronyms not present in VCS program definitions. The assessment team has issued the same finding. Closure of this public comment is pending closure of the same finding issued by the assessment team. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Edits to the methodology ensure all definitions are now covered</p> <p>Explanation of original Verra Response: updated in alignment with current revision</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | The assessment team reviewed the updated module and is reasonably assured Verra has sufficiently addressed the commenters concern. |
| Status | drafted |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Edits to the methodology and module ensure all uncommonly used terms definitions are now defined in covered by one of those docs or the <i>VCS Program Definitions</i> . |
| Comment # | 60 |
| Question | General |
| Section | 3.1 DEFINITIONS |
| Page (if relevant) | 3 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Activity Data (AD): The definition of AD provided is not sufficient. It excludes other activities, such as removals or forest management. |
| Proposed Change(s) | We suggest using the IPCC definition as a base and then add any changes unique to VERRA as necessary. The IPCC defines activity data as: "Data on the magnitude of a human activity resulting in emissions or removals taking place during a given period of time. Data on energy use, metal production, land areas, management systems, lime and fertilizer use and waste arisings are examples of activity data". Land use change indicators such as area, deforestation and degradation rates can be mentioned as well. |
| Verra Response | The definition of AD has been made more universal, and clarified that the module currently only applies to avoided deforestation. |
| Aster Global Assessment | The term "activity data" has no definition in the Methodology but is used in the document. The term "activity data" in the module is "Data on the magnitude of |

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| | <p>deforestation taking place during a given period of time". Given the use of the term activity data in the context of this methodology, the limited scope of the definition is appropriate. However "magnitude" is vague.</p> |
| Aster Global Initial Findings | <p>CL: Define activity data in the Methodology OFI: Consider specificity in defining activity data.</p> |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Activity data is not defined in the methodology at this time. Activity data follows the definition currently used under the IPCC and UNFCCC. Note that removals are excluded at this time.</p> <p>Explanation of original Verra Response: Definition of AD has been removed from this module</p> <p>Response to additional points raised by Aster: Activity Data is</p> |
| Aster Global Findings Round 2 | <p>The assessment team confirmed that the definition of activity data is largely consistent with the referenced sources. The methodology developer's response indicates that activity data is not currently defined in the methodology, yet the assessment team notes activity data is defined in the methodology. Additionally, the response provided appears to be incomplete.</p> |
| Round 2 NCR/CL/OFI2 | <p>CL: Please provide additional clarification regarding the definition of activity data, and if necessary provide additional information to complete the response.</p> |
| Round 2 Response from Methodology Developer | <p>Revised Verra response to original comment: The definition of Activity data has been added to Section 3.1 Definitions of the Methodology. Although the term "magnitude" is included in the IPCC definition of activity data, wording has been added to clarify how magnitude of the activity (i.e., deforestation) is to be interpreted.</p> |
| Aster Global Findings Round 3 | <p>The assessment team notes that activity data was originally defined as "The area of deforested or degraded forest registered in a specific area over a given period", then was for a period undefined and now is defined in the methodology as "Data on the magnitude (extent) of deforestation taking place during a given period of time". The Assessment Team notes that is somewhat congruent with IPCC although, unlike IPCC which includes all activities leading to emissions or removals, limits the category of activities eligible for inclusion as 'activity data' to just those activities resulting in emissions via deforestation. The Assessment team notes this precludes other changes mapped as per Appendix 1 (i.e., deforestation, forest regrowth, stable forest, and stable non-forest). Based on this definition as used in the Methodology, this would preclude forest regrowth as activity data as well as forest degradation in any future modules falling under this methodology.</p> |
| Round 3 NCR/CL/OFI | <p>CL: Please justify the limited definition of activity data in the methodology and this approach is used as opposed to another approach (e.g. defining activity data broadly but with an added nuance that only specific activity data are considered for specific modules)</p> |
| Round 3 Response from Methodology Developer | <p>Revised Verra response to original comment: The IPCC definition of Activity Data has been added to Section 3.1 Definitions of the methodology. In the module, "unplanned deforestation activity data" (UDef AD) is specified as appropriate.</p> <p>Note to Aster: With the change to UDef AD in the module, we changed a lot of instances where unplanned deforestation activity data was written out to UDef AD.</p> |

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| Aster Global Findings Round 4 | The Methodology now more broadly defines activity data as "Data on the magnitude of a human activity resulting in emissions or removals taking place during a given period of time ". This in line with IPCC. The modules now specify the type of activity data rather than narrowly defining activity data. This is sufficient to close. |
| Status | closed R4 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The IPCC definition of Activity Data has been added to Section 3.1 Definitions of the methodology. In the module, "unplanned deforestation activity data" (UDef AD) is specified as appropriate. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 61 |
| Question | General |
| Section | 3.1 DEFINITIONS |
| Page (if relevant) | 4 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Deforestation (Def): The guideline states: "If the country definition is not in line with VCS, elements of the country definition that do conform with VCS shall be adopted, while other elements shall be modified to conform to VCS". It is not clear when a country definition is or is not acceptable by VCS, whether this will undergo any validation, and when a list/database of updated country forest definitions will be provided. |
| Proposed Change(s) | Please clarify definition based on our question |
| Verra Response | The definition of <i>deforestation</i> has been removed, as it is the same as that in the VCS Program Definitions. The definition of <i>forest</i> to be used for this module, which is now in M0184, includes specific references to other VCS documents for clarity. |
| Aster Global Assessment | The assessment team notes that deforestation's definition has been removed as it is already covered by the VCS Program definitions, and that forest has been modified in such a way as to be compatible with country-specific definitions. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The definition of deforestation has been removed, as it is the same as that in the VCS Program Definitions. The definition of forest to be used for this module, which is now in VM048, includes specific references to other VCS documents for clarity. |
| Comment # | 62 |

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| Question | General |
| Section | 3.1 DEFINITIONS |
| Page (if relevant) | 4 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Deforestation (Def): The methodology states, "Areas meeting the definition of 'Forest' according to the criteria of minimum area, minimum tree height, and minimum canopy cover but where the trees at the beginning of the historical reference period are not yet 10 years old will be considered 'non-Forest'." Because of this requirement, our interpretation is that additional spatial analysis will be required to identify forest cover by evaluating an additional 10-year period that ends on/around the start date of the historical reference period or (~16-20 years before project start date). This presents a potential contradiction in the methodology that should be clarified: How should the forest age be classified? How are the 6-year baseline and 10-year minimum forest age requirement going to be reconciled? |
| Proposed Change(s) | Please clarify definition based on our question |
| Verra Response | The 10-year minimum age has been removed from the forest definition. Forest within the project boundary must have qualified as forest for a minimum of 10 years before the project start date (Section 5.1). |
| Aster Global Assessment | The assessment team notes that forest has been modified in such a way as to remove 10 years from the definition but add that "The entire UDef PA must be forest at the project start date and must only include land qualifying as forest for a minimum of 10 years prior to the project start date. " |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The 10-year minimum age has been removed from the forest definition. Forest within the project boundary must have qualified as forest for a minimum of 10 years before the project start date (VM0048 Section 5.1). |
| Comment # | 63 |
| Question | General |
| Section | 5.5. Development and allocation of Deforestation Activity Data |
| Page (if relevant) | 11 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Step 2: Enter data into JNR Allocation Tool. a. How and where is the risk class applied if the AD is produced using a sampling-based approach and the risk map is a wall-to-wall map? b. There's no mention of producing/obtaining/using a risk map in this section. It should be clearly linked to the process since it is necessary for the allocation tool. It is our |

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| | understanding that the production of a risk map must occur in order to use the JNR Allocation tool. Please clarify in the document. |
| Proposed Change(s) | Please clarify or modify the document based on our question |
| Verra Response | The process of risk mapping and allocation done by Verra and described fully in the UD-RP and UD-AP |
| Aster Global Assessment | The assessment team is unable to determine whether or not the developer has taken due account of this comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. |
| Aster Global Initial Findings | CL: Please address in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The comment is irrelevant as the commenter is referring to outdated versions of the two tools and the tools themselves are outside of the methodology.</p> <p>Explanation of original Verra Response: Verra affirms the original response.</p> <p>Response to additional points raised by Aster: The comment is irrelevant as the commenter is referring to outdated versions of the two tools and the tools themselves are outside of the methodology, and were at the time of the public comment.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | The methodology developer clarified the updated versions of the Udef-RP and UDef-AD have addressed the public comment. Additionally, the methodology developer has stated this public comment is out of scope with the assessment of the Methodology and AUDef module. The assessment team acknowledges this comment relates to Udef-RP and UDef-AD which fall beyond the scope of the assessment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The comment is irrelevant as the commenter is referring to outdated versions of the two tools; these tools have now been combined into one (VT0007). The content of this tool wasn't under consultation at this time and has changed. and the tools are outside of the methodology. |
| Comment # | 64 |
| Question | General |
| Section | 5.5.1 Estimate areas of Land Cover Transitions for the Historical Reference Period within the Jurisdiction |
| Page (if relevant) | 11 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |

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| Response(s) - including general questions & comments | A clear definition of "high-resolution imagery" is required. Characteristics and sources allowed could be described in this section. For example, there should be a specific maximum pixel-size value required here (e.g., 5 meters) and/or a list of possible acceptable sources. |
| Proposed Change(s) | Please clarify or modify the document based on our question |
| Verra Response | The Data Sources section of Section A1.4.1 has been edited to include specifications around resolution. |
| Aster Global Assessment | A1.4.1 describes high-resolution has 10 m or finer resolution for imagery acquired in 2015 or onwards and 30 m resolution for imagery acquired prior to 2015, addressing one part of the comment. However, commenter also asks if a list of possible sources can be supplied. |
| Aster Global Initial Findings | CL: Please address the commenter's notion that sources can be listed. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The Data Sources section of Section A1.4.1 has been edited to include specifications around resolution. Listing sources would likely make the methodology outdated and inadvertently limiting as new sources arise.</p> <p>Explanation of original Verra Response: Module has been updated since drafting, and is reflected in revised verra response.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | The assessment team determined that the spatial resolution specifications described in section A1.4.1 should be adequate. This should automatically identify possible sources that fulfill the specified spatial resolution of 10 meters or finer. This item is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>The Data Sources section of AUDef Section A1.4.1 has been edited to include specifications around resolution.</p> <p>Listing potential sources would likely make the methodology easily outdated and inadvertently limiting, as new sources will arise.</p> |
| Comment # | 65 |
| Question | General |
| Section | 5.5.1 Estimate areas of Land Cover Transitions for the Historical Reference Period within the Jurisdiction |
| Page (if relevant) | 11 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |

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| Response(s) - including general questions & comments | Under this context, the wording of “plots” is confusing, since this is usually associated with measurements taken in-person in the field. Sample areas, "virtual plots", or sample points would be a better term, since this will be visual inspection of imagery. |
| Proposed Change(s) | Please clarify or modify the document based on our question |
| Verra Response | Clarified that sample plots are generally observed with imagery, but may also be observed in situ if such data exists and meets other requirements |
| Aster Global Assessment | Section A1.4.1 describes plots as "human-interpretation of high-resolution imagery" |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Clarified in AUDef A1.4.1 Step 1 that sample plots are generally observed with imagery, but may also be observed in situ if such data exists and meets other requirements. |
| Comment # | 66 |
| Question | General |
| Section | 5.5.1 Step 1 Develop a historical land cover / land cover change dataset for each included LCT using a sample-based approach |
| Page (if relevant) | 12 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Since the data provider is going to perform the AD analysis, are they also going to create the Standard Operating Procedures mentioned in the module? At what stage will the SOP will be released or shared with the public? Will there be a comment period during which these SOPs are subject to QA/QC and revision? |
| Proposed Change(s) | Since this process will be carried out by the data provider chosen by Verra, the SOP should be shared as soon as possible and undergo a review and public comment process as well, seeing at it will be a core part of this methodology. |
| Verra Response | SOPs will be developed by DSPs and assessed by independent experts |
| Aster Global Assessment | The assessment team is similarly confused. A1.4.3 states Verra will construct FCBMs, guided by SOPs. Additionally, Table 17 in Appendix 4 states SOPs may come from "Submissions from Project Proponents, Governments, and Other Engaged Stakeholders". These appear in conflict with Verra's response implying SOPs are provided by DSPs. |
| Aster Global Initial Findings | CL Please clarify in line with findings. OFI: The passive language in A1.4.1 Step 1 removes the actor "Standard operating procedures (SOPs) must be developed and employed and must include...". There is an opportunity to improve clarity here. |
| Round 1 Response from | Revised Verra comment addressing original public comment: 1) All activities described in Appendices 1, 2 and 3 are to be carried out by Verra's contracted 3rd party data provider (DSP). The description of the need to develop SoPs in these appendices should therefore be understood as a responsibility of the 3rd party |

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| Methodology Developer | <p>DSP.</p> <p>2) Verra will work to maximize the release of information developed by the DSP including SoPs to the public. However, Verra also must balance the desire for public comment during the data creation process, with the need to develop the datasets on a strict timeline. The first round of 12 jurisdictional data creation contracts have not allowed time for formal public comment on SoPs. Future revisions to the contracting process may incorporate it, if it can be deemed to have limited impact on the timeline of data generation.</p> <p>3) Appendix 4 describes the opportunity for project developers and other stakeholders to submit SoPs to the DSP for review and possible adoption/adaptation. Verra explicitly places a premium on adhering to existing SOPs already tested and accepted by national REDD offices. Appendix 4 begins with the statement "Verra is responsible for AD collection, risk map development and AD allocation. It will contract with data service providers (DSPs) to accomplish this. Any stakeholder may provide data products related to AD collection and risk mapping for a given jurisdiction, provided these products meet the requirements set out in Table 18 below." All text in Appendix 4 is therefore understood as related to the optional provision of materials to Verra's contacted data service provider. Reference to SOP in 5.3.2.2 clarified to state "Standard operating procedures (SOPs) must be developed by the project..." Reference to SOP in A1.4.1 clarified to state "SOPs must be developed and employed by the data developer..."</p> <p>Explanation of original Verra response: Verra reaffirms its original comment, but expands with more context and citations to passages in the module</p> |
| Aster Global Findings Round 2 | <p>The commenter has asked 3 questions:</p> <ol style="list-style-type: none"> 1. In responses to this question, the methodology developer has sufficiently addressed/answered the commenter's question and clarified language where necessary. 2. Verra has clarified that they "maximize the release of information developed by the DSP"; however, has made no commitment to do so. Verra has provided sufficient clarification to address this public comment. 3. Verra has clarified that they are under no obligation to make SOPs public, submit them for public comment, and if able will take these additional steps. <p>While the assessor believes making SOPs public will create more transparency in the VCS Program, the assessor does not locate any Program requirements forcing Verra to do so. Thus, after a review of Verra's responses and the updated module, the assessor has determined that this finding is closed.</p> |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>1) All activities described in Appendices 1 and 2 and 3 are to be carried out by Verra's contracted 3rd party data provider (DSP). The description of the need to develop SoPs in these appendices should therefore be understood as a responsibility of the 3rd party DSP.</p> <p>2) Verra will work to maximize the release of information developed by the DSP including SoPs to the public. However, Verra also must balance the desire for public comment during the data creation process, with the need to develop the datasets on a strict timeline. The first round of 132 jurisdictional data creation contracts have not allowed time for formal public comment on SoPs. Future revisions to the contracting process may incorporate it, if it can be deemed to have limited impact on the timeline of data generation.</p> <p>3) Appendix 4 describes the opportunity for project developers and other stakeholders</p> |

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| | to submit SoPs to the DSP for review and possible adoption/adaptation. Verra explicitly places a premium on adhering to existing SOPs already tested and accepted by national REDD offices. Appendix 4 begins with the statement "Verra is responsible for AD collection, risk map development and AD allocation. It will contract with data service providers (DSPs) to accomplish this. Any stakeholder may provide data products related to AD collection and risk mapping for a given jurisdiction, provided these products meet the requirements set out in Table 18 below." All text in Appendix 4 is therefore understood as related to the optional provision of materials to Verra's contacted data service provider. Reference to SOP in 5.3.3.2 clarified to state "Standard operating procedures (SOPs) must be developed by the project..." Reference to SOP in A1.4.1 clarified to state "SOPs must be developed and employed by the data developer..." |
| Comment # | 67 |
| Question | General |
| Section | 5.5.1 Step 1 Develop a historical land cover / land cover change dataset for each included LCT using a sample-based approach |
| Page (if relevant) | 13 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | For the Sample Design, the text states the following: "Deforestation" should meet an uncertainty threshold of a half-width confidence interval that is within 10% ± the estimate at the 90% confidence level, otherwise be subject to conservative discounting. Please confirm that the "estimate" mentioned is the estimate of the mean. |
| Proposed Change(s) | Please clarify definition based on our question |
| Verra Response | This phrase no longer appears |
| Aster Global Assessment | The Appendix 1 of the Module now states "The estimated historical area of unplanned deforestation is discounted based on its uncertainty level. Where the percentage uncertainty of the estimated transition area is less than or equal to 10 percent, the estimate is used without modification and the discount factor is 0. Estimates with uncertainty levels above 20 percent are not admissible. Where the percentage uncertainty is between 10 percent and 20 percent, the area estimate must be scaled down by discount factor DF. " |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | This phrase no longer appears |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 68 |
| Question | General |

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| Section | 5.5.1 Step 1 Develop a historical land cover / land cover change dataset for each included LCT using a sample-based approach |
| Page (if relevant) | 13 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | In Response Design, please review threshold definition since it implies a longer [10-year + 6-year = 16-year] analysis than the 6-year baseline period. "...i.e., meet the thresholds of the definition of "forest" for at least the 10 previous consecutive years prior to the date observed". (Related to our comment on the definitions of "forest" and "non-forest", as described above. |
| Proposed Change(s) | Please clarify definition based on our question |
| Verra Response | More guidance has been provided in 5.5.1 on complying with this rule. Additional detail must be developed and documented within each SOP generated by the data developers. |
| Aster Global Assessment | As there is no Section 5.5.1, the assessment team is unable to determine what revisions the Module developer made in response to this comment. |
| Aster Global Initial Findings | CL: Please describe where and what changes have been made in response to this comment. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: At the jurisdiction, Verra has removed all requirements related to 10-year persistence to meet the definition of forest at the start of the historical reference period. It was deemed this standard could not be mapped with reasonable confidence, as it would require mapping as far back as 20 years prior to start of the baseline validity period. The exclusion of commercial plantations as 'identified exclusions' helps to capture much of the lands that otherwise would have met this definition. However, a requirement in Section 5.1.2 has been retained stating "The entire UDef PA must be forest at the project start date and must only include land qualifying as forest for a minimum of 10 years prior to the project start date.". This is the only location where there is an explicit reference to a 10-year persistence rule for definition of a land cover as forest.</p> <p>Explanation of original Verra response: Since drafting, section 5.5.1 no longer exists</p> |
| Aster Global Findings Round 2 | The methodology developer has clarified the changes made in line with the identified finding. The assessment team determined these changes are sufficient to address the comment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | At the jurisdiction, Verra has removed all requirements related to 10-year persistence to meet the definition of forest at the start of the historical reference period. It was deemed this standard could not be mapped with reasonable confidence, as it would require mapping as far back as 20 years prior to start of the baseline validity period. The exclusion of commercial plantations as 'identified exclusions' helps to capture much of the lands that otherwise would have met this definition. However, a requirement in AUDef Section 5.1.2 has been retained stating "The entire UDef PA |

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| | must be forest at the project start date and must only include land qualifying as forest for a minimum of 10 years prior to the project start date." This is the only location where there is an explicit reference to a 10-year persistence rule for definition of a land cover as forest. |
| Comment # | 69 |
| Question | General |
| Section | 5.5.1 Step 1 Develop a historical land cover / land cover change dataset for each included LCT using a sample-based approach |
| Page (if relevant) | 14 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Data Sources: "Assessment of land cover for years after 2020 is expected to always use 5m or better resolution." Please clarify what Verra means by "expected" - Will the use of 5-m resolution imagery be <i>required</i> for years after 2020 or will it simply be <i>suggested</i> ? Why was 2020 selected as a cut-off for using imagery of this resolution? |
| Proposed Change(s) | Please clarify definition based on our question |
| Verra Response | The section on Data Sources in 5.5.1 is revised to be more explicit on the definition of high resolution imagery, and under what circumstances exceptions can be made |
| Aster Global Assessment | The revision no longer states 5 m resolution is or should be used. In the current revision, the assessment team is unable to find what are the allowable exceptions, except in the case that data prior to 2015 may use 30 m resolution imagery. |
| Aster Global Initial Findings | CL: Please state where the allowable exceptions are within the module |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The section on Data Sources in AUDef 5.3.3.2 Step 1 and A1.4.1 Step 1 5.5.1 is revised to be more explicit on the definition of high resolution imagery, and under what circumstances exceptions can be made. |
| Comment # | 70 |
| Question | General |
| Section | 5.5.1 Step 1 Develop a historical land cover / land cover change dataset for each included LCT using a sample-based approach |
| Page (if relevant) | 14 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including | Planned vs Unplanned Deforestation: Regarding the definition o planned deforestation and the clearing of land for large-scale commodity agriculture on private land: |

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| general questions & comments | Do forestry plantations for wood or pulp production count as "commodity agriculture"? Can/should existing spatial datasets like forest concessions or forest plantations be used/referenced? |
| Proposed Change(s) | Please clarify the definition. Also, Verra could add more rigor to the process of differentiating between planned and unplanned deforestation using additional data sources (rather than relying 100% on image interpretation with no additional information). The methodology hints at using other sources (e.g., protected area boundaries) but does not specifically suggest or require this. |
| Verra Response | Commercial plantations are now defined in Appendix 1 A1.4.1 Step 1 Table 11 and called out as an identified exclusion |
| Aster Global Assessment | The response references the revisions related to commercial plantation exclusions (e.g. Table 9). However, the Verra response did not address the proposed changes related to differentiating between planning and unplanned deforestation using additional data sources. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <p>1) Commercial plantations are now defined in Appendix 1 A1.4.1 Step 1 Table 11 and called out as an identified exclusion</p> <p>2) Any guidance in the methodology on potential sources of information that may be consulted is not to the exclusion other possible source. There is the assumption that data providers are subject matter experts and may use any information at their disposal to construct a convincing justification for the delineation of identified exclusions, as long as the resulting products meet any standards outlined in the methodology.</p> <p>3)The definition of planned deforestation is provided by Verra's Methodology Requirements. However, in application of the definition to the delineation of identified exclusions the most critical factor is the area of contiguous deforestation.</p> <p>Explanation of original Verra Response: Additional guidance provided on use of ancillary datasets.</p> <p>Response to additional points raised by Aster: Verra does delimit the kinds of information a project proponent or a data service provider may consult, as long as the minimum requirements of the module are met.</p> |
| Aster Global Findings Round 2 | The assessment team acknowledges that the definition of planned deforestation is defined by the VCS Methodology Requirements. Clarification has been provided regarding use of additional data sources for justified exclusions. The assessment team determined this comment has been addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>1) Commercial plantations are now defined in AUDef Appendix 1 A1.4.1 Step 1 Table 11 and called out as an identified exclusion</p> <p>2) Any guidance in the methodology on potential sources of information that may be consulted is not to the exclusion other possible source. There is the assumption that data providers are subject matter experts and may use any information at their disposal to construct a convincing justification for the delineation of identified exclusions, as long as the resulting products meet any standards outlined in the methodology.</p> <p>3) The definition of planned deforestation is provided by the <i>VCS Methodology</i></p> |

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| | <i>Requirements</i> . However, in application of the definition to the delineation of identified exclusions the most critical factor is the area of contiguous deforestation. |
| Comment # | 71 |
| Question | General |
| Section | 5.5.1 Step 1 Develop a historical land cover / land cover change dataset for each included LCT using a sample-based approach |
| Page (if relevant) | 15 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | On the "Illustrative criteria that should be considered in developing Jurisdiction-specific SOP for planned deforestation", it seems the list provided is a mix of criteria that (a) suggest planned deforestation and (b) suggest unplanned deforestation (point 2a, for example). This should be clearer to avoid confusion. |
| Proposed Change(s) | Please clarify/modify the text based on our question |
| Verra Response | Verra's definition of reducing planned deforestation includes any activities that reduce net GHG emissions by stopping or reducing deforestation or degradation on forest lands that are legally authorized and documented for conversion. This is clarified in Appendix 1 Table 9. |
| Aster Global Assessment | The Table 9 in appendix 1 defines planned deforestation activities as those meeting other VCS definitions for planned deforestation AND must be at least 100 ha of deforestation cleared by a single agent. The assumption here is that centralized deforestation activities are generally 'planned'. The assessment team finds no confusion of this with unplanned deforestation. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Verra's definition of reducing planned deforestation includes any activities that reduce net GHG emissions by stopping or reducing deforestation or degradation on forest lands that are legally authorized and documented for conversion. This is clarified in AUDef Appendix 1 Table 9. |
| Comment # | 72 |
| Question | General |
| Section | 5.5.1 Step 1 Develop a historical land cover / land cover change dataset for each included LCT using a sample-based approach |
| Page (if relevant) | 16 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general | Data Analysis: In the paragraph, "The tallies of sample units are denominated as Count..." a. Language is unclear and needs revision. E.g., for each AD-C (AD-C 1, AD-C 2, ...) b. In the column AD-C Activities, the term "AD-C Activities" has not been mentioned |

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| questions & comments | until now and is not mentioned elsewhere in this document. This section requires more explanation/clarification and edits for consistency to avoid user confusion. c. The text states, “The sum of all cells must be equal to the proportion of Aj not identified as Excluded Known LCT, representing 100% of the Jurisdiction”. Though we understand the concept, the language is unclear. From the context, we understand that "cell" refers to the table(s) above, which have no captions (e.g., Table 1, Table 2) and therefore no clear connection to the text. |
| Proposed Change(s) | Edits for clarity are required. |
| Verra Response | Clarifying edits have been made throughout Appendix 1 Section A1.4.1 Step 1. |
| Aster Global Assessment | The assessment team confirms that revisions made to the Module have addressed the original commenter's concerns over ambiguous/unclear descriptions of procedure in appendix 1. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Clarifying edits have been made throughout AUDef Appendix 1 Section A1.4.1 Step 1. |
| Comment # | 73 |
| Question | General |
| Section | 5.5.1 Step 1 Develop a historical land cover / land cover change dataset for each included LCT using a sample-based approach |
| Page (if relevant) | 21 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Step 4: Assess JNR AT Precision targets for estimates of historical land cover transition area Regarding the calculation of the discount factors, what is the justification and source for this equation? |
| Proposed Change(s) | Requires explanation and justification – Cannot be taken on faith and should cite appropriate sources from peer-reviewed literature or published reports. |
| Verra Response | Footnote added to Appendix Section A1.4.1 referencing GFOI guidelines, which describe the need for adjusting area estimates using a point sample. |
| Aster Global Assessment | The assessment team deems this revision as adequate to address the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Footnote added to AUDef Appendix 1 Section A1.4.1 referencing GFOI guidelines, which describe the need for adjusting area estimates using a point sample. |

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| Comment # | 74 |
| Question | General |
| Section | 5.5.3 Allocate portions of the Jurisdictional Baseline Activity Data for Unplanned Deforestation to Project and Leakage Belt areas |
| Page (if relevant) | 25 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | In Step 4, clarify whether the "stratification" mentioned is based on forest type or risk class. |
| Proposed Change(s) | Please clarify or make appropriate modifications based on our comments and questions. |
| Verra Response | Clarification in step 4 has been added that 'strata' refers both to risk strata and carbon stock strata |
| Aster Global Assessment | A1.4.3 Step 4 now states "Stratify the area of stable forest at the end of the HRP in the PA and LB by risk class as mapped in the jurisdictional risk map, and by project-developed forest strata.". This is clear e.g., APA-UDef,r,i is the area of forest stratum I in risk class r. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | significant change |
| Revised Verra Response October 2023 | Step 4 is now described in the initial paragraph of A1.4.3 under the line "Undertaken by project proponent." Text has been revised to clarify that stratification is by project-developed forest strata. |
| Comment # | 75 |
| Question | General |
| Section | 5.5.3 Allocate portions of the Jurisdictional Baseline Activity Data for Unplanned Deforestation to Project and Leakage Belt areas |
| Page (if relevant) | 25 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | In Step 5, we think that area-based distribution among forest strata may not reflect reality. Depending on the character of each forest type (e.g., size of trees, accessibility), these strata may have different deforestation risks. This is why a risk mapping and allocation approach based only on distance to previous deforestation is not necessarily reflective of reality. This concern about different deforestation risk by forest stratum is also discussed in more detail with regard to the leakage module. |
| Proposed Change(s) | Please clarify or make appropriate modifications based on our comments and questions. |

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| Verra Response | To be addressed through revisions to the UDef-RP |
| Aster Global Assessment | The assessment team is unable to determine whether or not the developer has taken due account of this comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. |
| Aster Global Initial Findings | CL: Please address in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Please see the updated procedures for risk analysis and baseline allocation. These tools lie outside the methodology</p> <p>Explanation of original Verra Response: Verra affirms its original response.</p> <p>Response to additional points raised by Aster: The comment provides critique of the approach for developing risk maps, which is outside the scope of this methodology.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | The methodology developer has stated this public comment is out of scope with the assessment of the Methodology and AUDef module. The assessment team acknowledges this comment relates to UDef-RP which falls beyond the scope of the assessment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Please see the updated procedures for risk analysis and baseline allocation in VT0007. These tools lie outside the methodology. |
| Comment # | 76 |
| Question | General |
| Section | 5.5.3 Step 1. Development of Jurisdictional Forest Cover Benchmark Maps |
| Page (if relevant) | 25 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Carry out the Jurisdictional mapping: It is mentioned that "SOPs shall be developed to describe the workflow for mapping". We think it should be provided ASAP and subject to comment since these FCBMs will presumably be produced by the same third-party organization(s). Alternatively, this could be done by PP, eliminating the bottleneck that Verra is creating. |
| Proposed Change(s) | Please clarify or make appropriate modifications based on our comments and questions. |

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| Verra Response | Additional data has been provided about what the SOPs must contain (Appendix 1 A1.4.1 Step 1 Data Collection). The SOPs will not be open for public comment (for expediency) but Verra will review them. |
| Aster Global Assessment | The assessment team is confused by this response as it was under the assumption by Appendices in the module that SOPS will be reviewed by independent reviewers. |
| Aster Global Initial Findings | CL: Please clarify in line with finding |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <p>1) Additional data has been provided about what the SOPs must contain (Appendix 1 A1.4.1 Step 1 Data Collection).</p> <p>2) The SOPs will not be open for public comment prior to finalization of jurisdictional datasets but Verra will review them and may choose to release them for public review following data creation.</p> <p>3) Appendix 4 provides guidance on what kinds of information, including SOPs, that any party, including project proponents, may submit to the 3rd party data service provider for review. This guidance explicitly states in relation to stakeholder submitted SOPs: "Where submissions represent official government data, the DSP should use these data where the data are shown to be of at least comparable fitness for purpose as other available data sources. Except in the case of official government data, DSP is not obligated to use any or all submissions in dataset generation."</p> <p>4) Reference to SOP in 5.3.2.2 clarified to state "Standard operating procedures (SOPs) must be developed by the project..." Reference to SOP in A1.4.1 clarified to state "SOPs must be developed and employed by the data developer..."</p> <p>Explanation of original Verra response: Verra reaffirms its original comment, and provides additional context.</p> <p>Response to additional points raised by Aster: The original comment requests access by PPs to review SOPs. Verra's original comment clarifies that this access will not be granted. Review will rather be provided by an independent reviewer.</p> |
| Aster Global Findings Round 2 | The assessment team reviewed Verra's response and confirmed that Verra clarified that the SOPs not be made public sufficiently clarifying in regard to the public comment. This finding is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>1) Additional data has been provided about what the SOPs must contain (Appendix 1 A1.4.1 Step 1 Data Collection).</p> <p>2) The SOPs will not be open for public comment prior to finalization of jurisdictional datasets but Verra will review them and may choose to release them for public review following data creation.</p> <p>3) Appendix 4 provides guidance on what kinds of information, including SOPs, that any party, including project proponents, may submit to the 3rd party data service provider for review. This guidance explicitly states in relation to stakeholder submitted SOPs: "Where submissions represent official government data, the DSP should use these data where the data are shown to be of at least comparable fitness for purpose as other available data sources. Except in the case of official government data, DSP is not obligated to use any or all submissions in dataset generation."</p> <p>4) Reference to SOP in 5.3.3.2 clarified to state "Standard operating procedures</p> |

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| | (SOPs) must be developed by the project..." Reference to SOP in A1.4.1 clarified to state "SOPs must be developed and employed by the data developer..." |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 77 |
| Question | General |
| Section | 5.5.3 Step 1. Development of Jurisdictional Forest Cover Benchmark Maps |
| Page (if relevant) | 25 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Accuracy assessment of the Jurisdictional mapping Forest Cover Benchmark Map: The accuracy assessment for these maps should be evidence-based and reflect best practices and state-of-the-art approaches in remote sensing and spatial analysis. These should be described in detail. The methodology does describe some requirements for accuracy assessments on FCBMs produced by PPs - Are these standards also required of Verra's chosen third-party data suppliers? |
| Proposed Change(s) | Please clarify or make appropriate modifications based on our comments and questions. |
| Verra Response | The accuracy requirements for the FCBMs are set out in the UDef-RP |
| Aster Global Assessment | The assessment team is unable to determine whether or not the developer has taken due account of this comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. |
| Aster Global Initial Findings | CL: Please address in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Accuracy requirements for FCBMs are provided in Appendix 1</p> <p>Explanation of original Verra Response: Original response mistakenly located the reference to FCBM accuracy in the UDef-RP. It is in fact in Appendix 1.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | Accuracy assessment requirements for FCBMs are described in Section A1.4.3. This item is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Accuracy assessment requirements for FCBMs are described in Appendix 4-AUDef Section A1.4.3. |

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| Comment # | 78 |
| Question | General |
| Section | 5.5.3 Step 1. Development of Jurisdictional Forest Cover Benchmark Maps |
| Page (if relevant) | 26 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Re: integrating a project's FCBMs into the Jurisdictional FCBMs. The text states: "During the development of Jurisdictional Forest Cover Benchmark Maps (FCBMs) all proponents of projects either currently active or in the VCS pipeline and anticipating validation within the JBVP will be given the opportunity to submit Project-specific FCBMs (FCBMp)..." Therefore, what happens after the jurisdictional FCBM has been validated? Are PPs allowed to submit their own FCBMs for the project area and leakage belt if they register a project after a Jurisdictional map has been developed and validated? From the text, it sounds like they would have to wait until the next validation period. However, what if a PP produces and submits an FCBMp that is "significantly more accurate" than the "validated" jurisdictional FCBM? |
| Proposed Change(s) | Please clarify or make appropriate modifications based on our comments and questions. |
| Verra Response | This text (Appendix 1, A1.4.1 Step 1) is clear that PPs may (only) submit these "During the development of jurisdictional FCBM (FCBMj)". |
| Aster Global Assessment | The methodology developer clarified in and pointed to text in the module that states that PPs may only submit data during the development of the jurisdictional FCBM. As this is a direct answer to the question posed, this item is assessed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The text (AUDef Appendix 1, A1.4.1 Step 1) is clear that PPs may (only) submit these "During the development of jurisdictional FCBM (FCBMj)". |
| Comment # | 79 |
| Question | General |
| Section | 5.5.3 Step 2. Development of a Deforestation Risk Map of the jurisdiction |
| Page (if relevant) | 26 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | The J-ADB-UD module states: "The Risk map will contain 31 categorical risk classes ordered from 0 (= no risk) to 30 (=highest risk)". However, the JNR Risk Mapping Tool states: "the JNR Allocation Tool requires a map with <i>up to</i> 31 discrete 'risk classes'," (i.e., there must be 31 or less risk classes). The presenters in the webinars also confirmed that risk maps should less than or equal to 31 categorical risk classes. Please modify this document to ensure consistency with the JNR Risk Mapping Tool. |

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| Proposed Change(s) | Please clarify or make appropriate modifications based on our comments and questions. |
| Verra Response | To be addressed through revisions to the UDef-RP |
| Aster Global Assessment | The assessment team is unable to determine whether or not the developer has taken due account of this comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. |
| Aster Global Initial Findings | CL: Please address in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Methodology updated to no longer make reference to a specific number of risk classes, as this information is not relevant for this methodology to be implemented, and it may be modified through revisions to the risk mapping tool that are independent to this document.</p> <p>Explanation of original Verra Response: Original response correctly identifies questions related to the risk mapping tool as outside the scope of this module.</p> <p>Response to additional points raised by Aster: n/a</p> |
| Aster Global Findings Round 2 | The assessment team confirmed the updated methodology and module have no reference to specific number of risk classes. Additionally, the methodology developer has stated this public comment is out of scope with the assessment of the Methodology and AUDef module. The assessment team acknowledges this comment relates to UDef-RP which falls beyond the scope of the assessment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Methodology updated to no longer make reference to a specific number of risk classes, as this information is not relevant for this methodology to be implemented. It is set out in VT0007 the risk mapping tool that are independent to this document. |
| Comment # | 80 |
| Question | 2 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Terra Global Capital, LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>"When implementing the risk map tool, we find some important points that must be considered.</p> <p>In the first place, as shown in Map 1, we note that when there are large areas of non-forest and forest areas with little deforestation, the local deforestation rate at the boundaries between forest and non-forest areas is 0 and therefore, the risk of deforestation is low, Map 2. In mathematical terms this is correct, but if we take into</p> |

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| | <p>account the dynamics of those areas, the risk of deforestation should be much higher since the division between forest and non-forest, in most of the cases, it's agricultural expansion, and a considerable underestimation of the risk of deforestation in these critical areas are made with this tool. Another issue that is not very clear in the tool is what risk category should be assigned to areas with a local deforestation rate of 0. This concern arises, since the tool gives instructions to identify the areas of insignificant risk of deforestation and that these are category 0 in the final deforestation risk map. Therefore, it is assumed that areas with a local deforestation rate equal to 0 are considered to be in the category immediately above areas of insignificant risk of deforestation. This assumption is based on the fact that the total area with local deforestation zones equal to 0 is greater than the area with insignificant risk, and if we categorize the 0 local deforestation rate to 0 in the final risk map, then the insignificant risk calculation makes no effect in the risk map, as can be seen in Map 3. Additionally, the tool could consider the use of other variables related to the terrain, such as slope and aspect, in this way more weight can be given to areas that have terrain conditions that are more accessible than others. And in our experience using our land-use change model, while often forest density is the most significant variable, there are 2-5 other variables that can explain an additional 30-40%. In the JNR R&R the tool also allows to construct a risk map with a different methodology, as long as the RMSE is lower compared to the map created with the risk map tool proposed by VERRA. The tool creates a static risk map and the JNR allocation tool only works from risk categories defined by a risk map of this style. However, from models or learning machines, dynamic risk maps can be created over time that may have better adjustments, and the allocations can be made dynamically over time, too. This is something that can be done, but it is not clear if it is allowed by standard since the only alternative they offer for allocation is the JNR Allocation Tool. And in these new proposed rules AUD Methodology Application Guide v1.0 Section 5.3 "Until further notice, the JNR RMT is the only risk mapping approach that can be applied for the allocation of baseline jurisdictional activity data to AUD projects . Alternative risk mapping approaches may be considered by Verra to revise and improve the JNR R MT." For means that less accurate spatial risk models will be used, then there are better available in the market. "</p> |
| Verra Response | To be addressed through revisions to the UDef-RP |
| Aster Global Assessment | The assessment team is unable to determine whether or not the developer has taken due account of this comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <p>1) The current risk mapping tool is substantially different from the version available at the time this comment was written. Comments about the technical performance of the original RMT are not likely to bear significant relevance to the new tool. The revised RMT will be available for public comment prior to finalization.</p> <p>2) The Risk Mapping Tool allows for a variety of mapping approaches, and there is no restriction on the type of models allowed.</p> <p>Explanation of original Verra Response: Original response correctly identifies questions related to the risk mapping tool as outside the scope of this module.</p> |

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| | Response to additional points raised by Aster: n/a |
| Aster Global Findings Round 2 | The assessment team acknowledges this comment relates to the Unplanned Deforestation Risk Modeling and Mapping Procedure (UDef-RP) which falls beyond the scope of the assessment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | 1) The current <i>VT0007 Risk Mapping and Allocation Tool</i> risk mapping tool is substantially different from the version available at the time this comment was written. Comments about the technical performance of the original Risk Mapping Tool are not likely to bear significant relevance to the new tool. The revised RMT will be available for public comment prior to finalization. 2) VT0007 The Risk Mapping Tool allows for comparison of a variety of mapping approaches, and there is no restriction on the type of models allowed. |
| Comment # | 81 |
| Question | 3 |
| Section | 6 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Terra Global Capital, LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Accurate classified images come from in depth knowledge of the area and require intimate understanding of the land-use and land-use change dynamics. When developed properly wall to wall mapping will produce more spatially accurate results. Terra Global has completed many wall-to-wall classified images that meet the rigorous requirements of Verra (including third-party audited products). |
| Verra Response | For expediency, we have not included these as requirements for data service providers. However, they are included among the criteria for DSP proposal evaluation. |
| Aster Global Assessment | Due account was taken by noting that wall to wall mapping is an included criteria for DSP proposal evaluation. However, it is unclear what "for expediency" implies in the first sentence of the methodology developer's response. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: 1) It is consistent with all other verra methodologies that datasets are considered valid regardless of the background of the individuals who produced the data, as long as it can be shown the datasets meet requirements laid out in the module. 2) Verra weights local knowledge and connection with local stakeholders in the selection of data service providers 3) High quality Wall to wall maps are currently a methodological requirement - see Forest Cover Benchmark Maps. Explanation of original Verra Response: Verra correctly highlighted the proposal criteria for DSP proposal evaluation. Clarification provided that Verra does not intend to include as a methodological requirement eligibility criteria for the individuals involved in data creation. Additional |

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| | <p>clarity provided on wall to wall maps.</p> <p>Response to additional points raised by Aster: "For expediency" was incorrect word choice. It has been removed from updated response.</p> |
| Aster Global Findings Round 2 | The methodology developer has clarified the use of the term "for expediency" as an incorrect word choice in the revised response. Further clarification has been provided to address the original public comment. This item is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>1) It is consistent with all other Verra methodologies that datasets are considered valid regardless of the background of the individuals who produced the data, as long as it can be shown the datasets meet requirements laid out in the module.</p> <p>2) Verra weights local knowledge and connection with local stakeholders in the selection of data service providers</p> <p>3) High quality wall-to-wall maps are currently a methodological requirement - see Forest Cover Benchmark Maps.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 82 |
| Question | General |
| Section | Whole |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Terra Global Capital, LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | The methods and requirements for JNR baselines and under the Verra AD methods should be exactly the same. Why should they be different as JNR already handles this for use with nested projects. |
| Proposed Change(s) | Make one baseline module to use under JNR and Verra AD, there is absolutely no rationale for these to be different |
| Verra Response | JNR baselines next projects in jurisdictional FRELS; AUDef aims to give projects more autonomy than they would have under a jurisdictional program by allocating activity data instead of emissions. The UDef-RP and UDef-AP used for distributing the data are otherwise the same. |
| Aster Global Assessment | The methodology developer provided a justification as to why the JNR and AD methods could not be assessed under the same module. The assessment team reviewed the justification and determined it is sufficient to address the concern raised by the commenter. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |

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| Revised Verra Response October 2023 | JNR baselines next projects in jurisdictional FRELS; AUDef aims to give projects more autonomy than they would have under a jurisdictional program by allocating activity data instead of emissions. VT0007 can be used for distributing activity data (for this module or FRELS (for JNR) data; otherwise, the tool has the exact same function in either use case. The UDef-RP and UDef-AP used for distributing the data are otherwise the same. |
| Comment # | 83 |
| Question | General |
| Section | RS method sections |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Terra Global Capital, LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | These methods promote sampling approaches which are often less accurate than wall to wall. And then by applying a simplified risk map onto a sampled baseline creates more uncertainty. |
| Proposed Change(s) | Require wall to wall mapping, it can be done and we have successfully done this in numerous areas. |
| Verra Response | 'Following best practices outlined in "GFOI Integration of remote-sensing and ground-based observations for estimation of emissions and removals of greenhouse gases in forests," section 4.2, the estimate of deforestation area from a map must be adjusted using accuracy point samples. In <i>AUDef</i> , highly accurate land cover change maps can be used to define sampling strata for the point samples, and doing so will substantially reduce effort and improve precision. Projects can furthermore make project-specific FCBMs and submit them for comparison to the jurisdictional FCBM. |
| Aster Global Assessment | The Verra response addresses the comment and the assessment team finds this adequate, given that the Module allows projects to submit their own FCBMp. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | 'Following best practices outlined in "GFOI Integration of remote-sensing and ground-based observations for estimation of emissions and removals of greenhouse gases in forests," section 4.2, the estimate of deforestation area from a map must be adjusted using accuracy point samples. In <i>AUDef</i> , highly accurate land cover change maps can be used to define sampling strata for the point samples, and doing so will substantially reduce effort and improve precision. Projects can furthermore make project-specific FCBMs and submit them for comparison to the jurisdictional FCBM. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 84 |
| Question | General |
| Section | 5.4 |
| Page (if relevant) | N/A |

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| Line (if relevant) | N/A |
| Reviewer Organization | Terra Global Capital, LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | The requirements that the area needs to be a jurisdiction and meet these new (ARTrees looking) minimum size is problematic in a number of ways. This makes no sense to "If the country is larger than 2.5 million hectares and the second-level administrative Jurisdiction (i.e., one administrative level below the national level) is smaller than 5 million hectares, the boundary of the second-level administrative Jurisdiction may be selected" |
| Proposed Change(s) | Again, why should these differ from JNR requirements. Make them the same as JNR. |
| Verra Response | How a jurisdiction is defined has been updated (see Appendix 1 Section A1.2.1). Because there is no government proponent, the definition can't be exactly the same as it is in JNR. |
| Aster Global Assessment | A1.2.1 has been refined to state: "• The national boundaries may always be used as the jurisdiction. • Where there is a clear expression of government intent to use alternative boundaries in developing jurisdictional REDD programs (e.g., those included in a submission of a FREL to the UNFCCC or a submission to the FCPF's Carbon Fund, the BioCF ISFL or to ART/TREES), the boundaries of a government's jurisdictional REDD+ programme may be used. Only in this case may boundaries be defined using biomes, water catchment areas.A1.". further, "The boundaries of a jurisdiction must not spatially overlap with any other jurisdictional boundary defined by Verra or with any registered JNR jurisdictional FREL or program....Where the above criteria defining jurisdictional boundaries are not achievable due to the presence of other jurisdictions for which a valid VCS jurisdictional AD baseline or JNR program and FREL exist, the jurisdiction must be defined as the remaining area within the national boundary." Lastly, projects are not applicable where they exist within a VCS JNR or FREL program. Therefore the assessment team finds no conflict with how a jurisdiction is defined. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | How a jurisdiction is defined has been updated (see Appendix 1 Section A1.2.1). Because there is no government proponent, the definition can't be exactly the same as it is in JNR. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 85 |
| Question | General |
| Section | 5.1 |
| Page (if relevant) | 7 |
| Line (if relevant) | 1 |

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| Reviewer Organization | Ecológica Assessoria |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | What is the deadline for defining annual deforestation rates by Verra? What will be the costs of extra steps that were previously carried out by the PP? Who will be responsible for paying these costs? |
| Verra Response | It is outside of the scope of this methodology to include Verra's fees. Verra will charge a fee for allocation of activity data. Projects will cover the usual validation and verification fees but will benefit from the fact that the activity data does not need additional validation or verification. |
| Aster Global Assessment | Verra has adequately addressed the questions "What will be the costs of extra steps that were previously carried out by the PP? Who will be responsible for paying these costs?" but has not addressed "What is the deadline for defining annual deforestation rates by Verra?" |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <p>1) The current risk mapping tool is substantially different from the version available at the time this comment was written. Comments about the technical performance of the original RMT are not likely to bear significant relevance to the new tool. The revised RMT will be available for public comment prior to finalization.</p> <p>2) The Risk Mapping Tool allows for a variety of mapping approaches, and there is no restriction on the type of models allowed.</p> <p>Explanation of original Verra Response: Original response correctly identifies questions related to the risk mapping tool as outside the scope of this module.</p> <p>Response to additional points raised by Aster: n/a</p> |
| Aster Global Findings Round 2 | The methodology developer has stated this public comment is out of scope with the assessment of the Methodology and AUDef module. The assessment team acknowledges this comment relates to UDef-RP which falls beyond the scope of the assessment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | fee text added/revised |
| Revised Verra Response October 2023 | It is outside of the scope of this methodology to include Verra's fees. Verra will charge a fee for allocation of activity data. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects. The fee structure (in summary or in part) will be released with the final methodology. Projects will cover the usual validation and verification fees but will benefit from the fact that the activity data does not need additional validation or verification. |
| Comment # | 86 |
| Question | General |
| Section | 5.4 |

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| Page relevant) (if) | 10 |
| Line relevant) (if) | 6 |
| Reviewer Organization | Ecológica Assessoria |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | It was not clear how the jurisdiction will be adopted and the J-ADB-UD Description Report prepared. In the case of Brazil, we have the limits of Municipality, State, Country and Biome, how will the division be done in case the areas are in more than one jurisdiction. What will be the effect of this on the calculation of avoided emissions? |
| Proposed Change(s) | For those cases where there is overlapping jurisdiction, it is necessary to carry out an analysis contemplating two or more jurisdictions because the dynamics of each one may be different. This takes into account how it happens in Brazil and the particularities of smaller administrative boundaries, such as municipalities. |
| Verra Response | This is a good example of why flexibility in jurisdictional definition is needed (per Appendix 1 Section A1.2.1). Verra will define all reference regions, in consultation with governments, existing REDD programs, project proponents, and may utilize definitions based on administrative units, or geographic factors such as ecosystems, or watersheds. For projects that overlap jurisdictional boundaries, see Appendix 1 Section A3.2. |
| Aster Global Assessment | The assessment team notes the response reiterates language in A1.2.1 and has addressed the original comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | This is a good example of why flexibility in jurisdictional definition is needed (per Appendix 1 Section A1.2.1). Verra will define all reference regions, in consultation with governments, existing REDD programs, project proponents, and may utilize definitions based on administrative units, or geographic factors such as ecosystems, or watersheds. For projects that overlap jurisdictional boundaries, see Appendix 1 Section A1.2.1 A3.2. |
| Comment # | 87 |
| Question | General |
| Section | 5.5 |
| Page relevant) (if) | 11 |
| Line relevant) (if) | 1 |
| Reviewer Organization | Ecológica Assessoria |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | Will all the steps described in the figure be developed by VERRA and its collaborators? What is the Project Proponent's role in preparing these? What are the deadline and costs assigned to each step? |
| Verra Response | Responses set out in Appendix 3 |

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| Aster Global Assessment | Figure 6 in Appendix 3, as well as Table 17 in Appendix 4, lay out the roles and responsibilities of different entities. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Responses set out in Appendix 3. See also comment # 85. |
| Comment # | 88 |
| Question | General |
| Section | 5.5.1 |
| Page (if relevant) | 14 |
| Line (if relevant) | 25 |
| Reviewer Organization | Ecológica Assessoria |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | How will analysts differentiate between planned and unplanned deforestation, given that the patterns observed in the images do not irrefutably determine their category? |
| Proposed Change(s) | In some regions of Brazil there are specific particularities of unplanned deforestation that, by satellite image, may appear to be planned deforestation, as they drivers who are able to plan to deforest without the authorization of the competent organizations. See: https://www1.folha.uol.com.br/ambiente/2020/12/quase-90-do-desmatamento-da-amazonia-em-mato-grosso-nos-ultimos-12-anos-foi-ilegal.shtml |
| Verra Response | DSPs will need to utilize on-the-ground sources or other documentation to distinguish planned from unplanned deforestation. |
| Aster Global Assessment | The assessment team notes that SOPS must include a working definition of large-scale planned deforestation and associated interpretation guidance. This is congruent with the response given by Verra and satisfies the original comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | DSPs will need to utilize on-the-ground sources or other documentation to distinguish planned from unplanned deforestation. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 89 |
| Question | General |
| Section | 5.5.1 |
| Page (if relevant) | 14 |

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| Line (if relevant) | 36 |
| Reviewer Organization | Ecológica Assessoria |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | Wouldn't the examples of drivers presented as suggestive elements in the analysis of the images be more adequately applied in the analysis of risk mapping and allocation? |
| Verra Response | To be addressed through revisions to the <i>UDef-RP</i> |
| Aster Global Assessment | The assessment team is unable to determine whether or not the developer has taken due account of this comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The text referred to by the original comment related to identification of planned deforestation in high resolution imagery does not exist in revised draft. Information on drivers may be used in the risk mapping tool, if an alternative risk model is developed. Project developers may submit information on drivers to the DSP for consideration in risk mapping.</p> <p>Explanation of original Verra Response: Original response correctly identifies questions related to the risk mapping tool as outside the scope of this module.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | The methodology developer clarified the updated version of the Udef-RP has addressed the public comment. Additionally, the methodology developer has stated this public comment is out of scope with the assessment of the Methodology and AUDef module. The assessment team acknowledges this comment relates to UDef-RP which falls beyond the scope of the assessment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The text referred to in by the original comment related to identification of planned deforestation in high resolution imagery does not exist in revised draft. Information on drivers may be used in the risk mapping tool if developing an alternative risk model under VT0007 is developed. Project developers may also submit information on drivers to the DSP for consideration in risk mapping. |
| Comment # | 90 |
| Question | 2 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |

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| Reviewer Organization | Green Growth Consulting Firm |
| Reviewer Country | Bhutan |
| Response(s) - including general questions & comments | National circumstances of unplanned deforestation are; hydropower, agriculture, mining, roads. The pattern can be mosaic in a particular landscapes. Definition of "unplanned" and "planned" need to be clear first. |
| Verra Response | See #88 |
| Aster Global Assessment | #88 refers to the definition of the historical reference period. The assessment team is unsure how that is germane to this comment. |
| Aster Global Initial Findings | CL: Please directly address original comment. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Planned deforestation is defined in the VCS Standard. The purpose of the methodology is to exclude forms of deforestation which defy the risk modeling approach including identified exclusions that are large instances of planned deforestation. There is now more specific guidance in the methodology around how to identify certain types of 'identified exclusions', some of which are examples of planned deforestation. There is no requirement to exhaustively differentiate all planned and unplanned deforestation in the historical period.</p> <p>Explanation of original Verra Response: Original response mistakenly cited the wrong comment. It should be disregarded.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | The methodology developer has indicated that the definition of planned deforestation can be found in the Standard. While not indicated in the response, the assessment team notes that the definition for unplanned deforestation is also included in the Standard. Additional clarity pertaining to exclusions is provided. As the commenter requested clear definitions of planned and unplanned deforestation, the assessment team has determined that this item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Planned deforestation is defined in the <i>VCS Standard</i> . The purpose of the methodology is to exclude forms of deforestation which defy the risk modeling approach including identified exclusions that are large instances of planned deforestation. There is now more specific guidance in the AUDef module methodology around how to identify certain types of 'identified exclusions', some of which are examples of planned deforestation. There is no requirement to exhaustively differentiate all planned and unplanned deforestation in the historical period. |
| Comment # | 91 |
| Question | General |
| Section | 4 |
| Page (if relevant) | 7 |

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| Line (if relevant) | N/A |
| Reviewer Organization | Green Growth Consulting Firm |
| Reviewer Country | Bhutan |
| Response(s) - including general questions & comments | Applicability conditions is doubtful e.g., where it is applicable? |
| Proposed Change(s) | The applicability conditions should be directly relevant to field circumstances |
| Verra Response | AUDef's applicability conditions describe conditions under which the module can and cannot be used. |
| Aster Global Assessment | The assessment team concurs that applicability conditions are listed in the Module. Given the broad/vagueness of the comment--and that the assessment team is evaluating the applicability conditions, this item is closed as it will be addressed by the assessment team. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | AUDef's applicability conditions describe conditions under which the module can and cannot be used. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 92 |
| Question | 2 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Clark University |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Yes, see https://www.mdpi.com/2073-445X/7/3/105 and what we discussed during summer 2021. The proposed method to select the best risk map has conceptual flaws. The Total Operating Characteristic assesses the risk map in terms of allocation; use the free software at https://lazygis.github.io/projects/TOCCurveGenerator as described in https://www.mdpi.com/2072-4292/13/19/3922 Read the book at https://link.springer.com/book/10.1007/978-3-030-70765-1 |
| Verra Response | To be addressed through revisions to the <i>UDef-RP</i> |
| Aster Global Assessment | The assessment team is unable to determine whether or not the developer has taken due account of this comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. |

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| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The revised risk mapping tool now incorporates a new approach to comparing maps, the TOC curve.</p> <p>Explanation of original Verra Response: Original response correctly identifies questions related to the risk mapping tool as outside the scope of this module.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | The UDef-RP tool has been revised based on commenter's comment which now incorporates the Total Operating Characteristics Curve to select best risk map. The methodology developer has stated this public comment is out of scope with the assessment of the Methodology and AUDef module. The assessment team acknowledges this comment relates to UDef-RP which falls beyond the scope of the assessment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | significant change |
| Revised Verra Response October 2023 | The VT0007 revised risk mapping tool now incorporates a new approach to comparing maps, the Median Absolute Deviation TOC curve. |
| Comment # | 93 |
| Question | 3 |
| Section | 6 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Clark University |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | See https://www.mdpi.com/1999-4907/6/12/4386/htm |
| Verra Response | Verra requires a more concrete recommendation to be able to adequately respond. |
| Aster Global Assessment | The assessment team cannot find a comment that is able to be addressed. This item is closed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra | Verra requires a more concrete recommendation to be able to adequately respond. |

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| Response October 2023 | |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 94 |
| Question | General |
| Section | 5.5.1 |
| Page (if relevant) | 11 |
| Line (if relevant) | N/A |
| Reviewer Organization | Clark University |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>1) This should emphasize that the computations must account for the sampling design when estimating the population parameters (Olofsson et al. 2014, Pontius Jr 2022) https://doi.org/10.1016/j.rse.2014.02.015 https://link.springer.com/book/10.1007/978-3-030-70765-1 chapter 5.</p> <p>2) Either define high-resolution or do not use the phrase high-resolution.</p> <p>3) Specify what is to be done when the human cannot determine the category from the imagery or when various humans disagree.</p> |
| Verra Response | <p>1) Footnote added about this in Section 5.3.1.3 Step 3</p> <p>2) Addressed via a footnote in Section 5.3.2.2 Step 1</p> <p>3) Section 5.3.2.2 Step 1 stipulates that SOPs must include rules for dealing with disagreements on class identification between analysts</p> |
| Aster Global Assessment | <p>1) The assessment team is unable to locate a footnote that describes that the standard error must correctly account for sampling design.</p> <p>2) High resolution imagery is defined in the Module. This is adequately addressed by Verra.</p> <p>3) The SOPs do require resolution of disagreements. This is adequately addressed by Verra.</p> |
| Aster Global Initial Findings | CL: The assessment team was unable to identify the footnote which stated computations must account for the sampling design. Please address in line with original public comment. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <p>1) Parameters wwss (used both in 5.3.2.2 and A1.4.1) account for the sampling strata weights in the scaling of all population parameters</p> <p>2) Addressed via a footnote in Section 5.3.2.2 Step 1</p> <p>3) Section 5.3.2.2 Step 1 stipulates that SOPs must include rules for dealing with disagreements on class identification between analysts</p> <p>Explanation of original Verra Response: Verra incorrectly cited a footnote which no longer exists re item 1). Updated response clarifies that sampling weights are taken into account through WWss parameter.</p> <p>Response to additional points raised by Aster: n/a</p> |

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| Aster Global Findings Round 2 | The commenter's concern has been addressed with the description added in Section 5.3.2.2 and A1.4.1 regarding the sampling design and estimating population parameters. This item is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | 1) Parameters w_{w_ss} (used both in 5.3.23.2 and A1.4.1) accounts for the sampling strata weights in the scaling of all population parameters 2) Addressed via a footnote in Section 5.3.23.2 Step 1 3) Section 5.3.23.2 Step 1 stipulates that SOPs must include rules for dealing with disagreements on class identification between analysts |
| Comment # | 95 |
| Question | General |
| Section | 5.5.1 |
| Page (if relevant) | 12 |
| Line (if relevant) | N/A |
| Reviewer Organization | Clark University |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Give the equation to conservatively discount. Give the equation to annualize. Pontius knows of two equation to annualize; one equation assumes linear decay while the other equation assumes exponential decay (Pontius et al. 2017) https://doi.org/10.1007/s10980-017-0584-x |
| Proposed Change(s) | None- the equations are included further down in the document |
| Verra Response | The equations for these calculations are provided in Appendix 1 Sections A1.4.1 Step 4 and A1.4.2. |
| Aster Global Assessment | The assessment team is able to confirm the response from Verra. Eq 71 contains Average annual area of unplanned deforestation within the jurisdiction over the HRP per year and Eq 68 has an equation to conservatively discount. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The equations for these calculations are provided in Appendix 1 Sections A1.4.1 Step 4 and A1.4.2. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 96 |
| Question | General |
| Section | 5.5.1 |
| Page (if relevant) | 12 |

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| Line (if relevant) | N/A |
| Reviewer Organization | Clark University |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Use the word “significant” if and only if the p-value less than alpha for a hypothesis test using inferential statistics. Documents that describe quantitative methods are extremely confusing when significant means statistically significant in some places but means large or important in other places. |
| Proposed Change(s) | changed to substantially |
| Verra Response | Word changed to 'substantially' |
| Aster Global Assessment | The assessment team notes that additional uses of 'significant' can be read to imply a statistical test or test by other means. For example, 5.3.1.1 and the footnote 4 in 5.3.1.1. |
| Aster Global Initial Findings | CL: Please define significant in these circumstances. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <ol style="list-style-type: none"> 1) Reference in 5.3.1.1 about stratification changed to 'meaningful' 2) references in 5.3.1.3 step 3 include citation of T-SIG as test of significance 3) references in 5.3.3.7 include citation of T-SIG as test of significance 4) No other uses of term significance in methodology remain. <p>Explanation of original Verra Response: Original response was correct for some instances of 'significant', but more detail has been provided on the exact updates to the text.</p> <p>Response to additional points raised by Aster: n/a</p> |
| Aster Global Findings Round 2 | The assessment team confirmed that "significantly" has been replaced with meaningfully in Section 5.3.11. Inclusion of the citation for T-SIG in the other referenced sections is appropriate. |
| Round 2 NCR/CL/OFI2 | OFI: The assessment team is issuing an OFI under the principle of transparency and consistency. The word "meaningful" is vague and subject to interpretation and it's replacement or definition would add to the clarity of the methodology. |
| Round 2 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <ol style="list-style-type: none"> 1) The clause in item 3) of the first list in 5.3.1.1 has referring to differences in carbon stocks as a criterion to define stratum, has been deleted. Rules around stratification related to differences in carbon stocks are already provided by X-STR. 2) References in 5.3.1.3 step 3 include citation of T-SIG as test of significance 3) References in 5.3.3.7 include citation of T-SIG as test of significance 4) No other uses of term significance in methodology remain. <p>Note to Aster: Response 1) has been modified since R1 response from developer</p> |
| Aster Global Findings Round 3 | The Assessment Team confirms "Meaningful" has been stricken from 5.3.1.1. The only remaining use of 'significant' without an associated qualifying test is footnote 7 in 5.3.1.1. |

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| Round NCR/CL/OFI | 3 | CL: Please define significant in this circumstance. |
| Round Response from Methodology Developer | 3 | <p>Revised Verra comment addressing original public comment: All instances of the term "significant" have been defined or eliminated. Specifically: 1) The clause in item 3) of the first list in 5.3.1.1 has referring to differences in carbon stocks as a criterion to define stratum, has been deleted. Rules around stratification related to differences in carbon stocks are already provided by X-STR. 2) References in 5.3.1.3 step 3 include citation of T-SIG as test of significance 3) References in 5.3.3.7 include citation of T-SIG as test of significance 4) Reference in footnote 7 of 5.3.1.1 has been changed to "unavoidable" to correspond with the VCS Standard 5) No other uses of term significance in methodology remain.</p> <p>Note to Aster: #4 was added in response to Aster R3 finding</p> |
| Aster Global Findings Round 4 | | The latest revision of the Module has corrected the instance brought up in the latest finding. All uses of significant are now appropriate and well defined. Closed. |
| Status | | closed R4 |
| Response Updated Since Finding Closed? | | no |
| Revised Verra Response October 2023 | | <p>All instances of the term "significant" have been defined or eliminated. Specifically: 1) The clause in item 3) of the first list in 5.3.42.1 has referring to differences in carbon stocks as a criterion to define stratum, has been deleted. Rules around stratification related to differences in carbon stocks are already provided by X-STR. 2) References in 5.3.42.3 step 3 include citation of T-SIG as test of significance 3) References in 5.3.3.7 include citation of T-SIG as test of significance 4) Reference in footnote 7 8 of 5.3.42.1 has been changed to "unavoidable" to correspond with the VCS Standard 5) No other uses of term significance in methodology remain.</p> |
| Aster Global Assessment of Revised Response | | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | | 97 |
| Question | | General |
| Section | | 5.5.1 |
| Page (if relevant) | | 13 |
| Line (if relevant) | | N/A |
| Reviewer Organization | | Clark University |
| Reviewer Country | | USA |
| Response(s) - including general questions & comments | | Pontius recommends that users submit a map of the sampling points that designates each point as certain, uncertain, or unavailable in the reference data. The methods should report the number of points of certain, uncertain, and inaccessible in the reference data. Certain means the human judges that the reference point is obvious. Uncertain means the human judges that the reference point is not obvious. Unavailable means the human cannot see the reference point. It is important to see a map of the spatial distribution of points because Pontius has seen cases where |

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| | authors claim the sampling is random, but a map shows clearly that sampling points followed roads. |
| Verra Response | Appendix 1 A1.4.1 Step I Data collection #8 of the SOPs has been modified to include tracking of analyst certainty. |
| Aster Global Assessment | The assessment team finds that item 1 under A1.4.1 Data collection address the commenter's concern about sample distribution. Step 8 states "8) Cross-checks among analysts and rules for resolving disagreements". This is not the same as the commenter's request for a log of certain/uncertain and inaccessible, nor does it explicitly state 'tracking of analyst certainty'. |
| Aster Global Initial Findings | CL: Please clarify where analyst certainty is required by SOPs. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Verra acknowledges the advice, but chooses not to incorporate it into this version of the methodology because it is A) untested and B) would require an SOP-level of detail about plot sampling that is out of scale to other guidance in the module. The approach proposed by Pontius is currently being tested by Verra's data service providers. If those results are deemed useful in quantifying the uncertainty of the AD estimates, a future version of the methodology may incorporate this approach.</p> <p>Explanation of original Verra Response: Original response was correct, but in relation to an edit made after Aster review of this section.</p> <p>Response to additional points raised by Aster: Methodology now explicitly states "8) Cross-checks among analysts, recording of analyst certainty around each plot interpretation, and rules for resolving disagreements. "</p> |
| Aster Global Findings Round 2 | Section A1.4.1/Step 1 in the updated document now clearly states "8) Cross-checks among analysts, recording of analyst certainty around each plot interpretation, and rules for resolving disagreements." Additionally, the methodology developer clarified the approach suggested (reporting the number of points of certain, uncertain, and inaccessible in the reference data) by the commenter is being currently tested by Verra's DSP and if deemed useful future version of the methodology may incorporate the suggested approach. This item is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Verra acknowledges the advice, but chooses not to incorporate it into this version of the methodology because it is A) untested and B) would require an SOP-level of detail about plot sampling that is out of scale to other guidance in the module. The approach proposed by Pontius is currently being tested by Verra's data service providers. If those results are deemed useful in quantifying the uncertainty of the AD estimates, a future version of the methodology may incorporate this approach. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 98 |
| Question | General |

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| Section | N/A |
| Page (if relevant) | 14 |
| Line (if relevant) | N/A |
| Reviewer Organization | Clark University |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Define of reliably similar. Specify what to do when the sources do not show reliably similar results. |
| Verra Response | Clarification added that ground data can be used to support visual interpretation, but is not expected to be a primary data source. |
| Aster Global Assessment | Verra responded by saying auxiliary spatial data and in-situ observations can be integrated in numerous ways; first when projects delineate strata, second when projects propose their own FCBMp., third in interpretation of aerial imagery as auxiliary information. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Clarification added that ground data can be used to support visual interpretation, but is not expected to be a primary data source. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 99 |
| Question | General |
| Section | N/A |
| Page (if relevant) | 14 |
| Line (if relevant) | N/A |
| Reviewer Organization | Clark University |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Change from “are only permissible if” to “are permissible only if”. Put the word only near the word that only modifies. In this case, only modifies if. Only modifies neither are nor permissible. |
| Verra Response | Clarification added that ground data can be used to support visual interpretation, but is not expected to be a primary data source. |
| Aster Global Assessment | Verra responded by saying auxiliary spatial data and in-situ observations can be integrated in numerous ways; first when projects delineate strata, second when projects propose their own FCBMp., third in interpretation of aerial imagery as auxiliary information. |

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| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Clarification added that ground data can be used to support visual interpretation, but is not expected to be a primary data source. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 100 |
| Question | General |
| Section | N/A |
| Page (if relevant) | 14 |
| Line (if relevant) | N/A |
| Reviewer Organization | Clark University |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Specify what to do when the analyst cannot differentiate planned versus unplanned. |
| Verra Response | See #88 |
| Aster Global Assessment | #88 refers to the definition of the historical reference period. The assessment team is unsure how that is germane to this comment. |
| Aster Global Initial Findings | CL: Please directly address original comment. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <p>1) The following guidance from A1.4.1 Step 1 Data Collection applies: "Where the deforestation event does not unambiguously meet the definition of planned deforestation, the plot observation should be recorded as change category deforestation. An additional record must be made for such plots identifying them as "large-scale deforestation." (emphasis added)</p> <p>2) The methodology describes the use of cross checks as a QA/QC approach. Developing an approach to resolve confusing observations is important for all aspects of plot interpretation.</p> <p>Explanation of original Verra Response: Original comment included an incorrect response to another response and should be disregarded.</p> <p>Response to additional points raised by Aster: n/a</p> |

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| Aster Global Findings Round 2 | The methodology developer has provided further clarification, stating that the initial comment referred to an inaccurate response. The guidance in Section A1.4.1 Step 1 Data collection, specifically explains the process of distinguishing between planned and unplanned deforestation. This item is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | 1) The following guidance from <i>AUDef</i> A1.4.1 Step 1 Data Collection applies: "Where the deforestation event does not unambiguously meet the definition of planned deforestation, the plot observation should be recorded as change category deforestation. An additional record must be made for such plots identifying them as "large-scale deforestation." (emphasis added) 2) The module methodology describes the use of cross checks as a QA/QC approach. Developing an approach to resolve confusing observations is important for all aspects of plot interpretation. |

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| Comment # | 101 |
| Question | General |
| Section | 5.5.3 |
| Page (if relevant) | 25 |
| Line (if relevant) | Last line |
| Reviewer Organization | Clark University |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | The last sentence states "The aggregate accuracy (overall agreement) for the binary forest-cover map shall amount to at least 90%", which is a misleading distraction. Section 5.2 on page 8 says that we must estimate four components: Forest Loss, Forest Gain, Forest Persistence, and Non-Forest Persistence. Thus the error assessment must compare those four types. The sampling must designate each point as one of those four types in the map and in the reference data. This is likely to require stratified sampling to include a sufficient number of samples where the map shows persistence and the reference data show change. The accuracy at an individual time point is misleading and perpetuates a major misconception in the profession. |
| Verra Response | This section (Appendix A A1.4.3 Step 1 Accuracy Assessment of the Jurisdictional FCBM) has been significantly revised. |
| Aster Global Assessment | Revisions to the module no longer lead to binary outcomes. Accuracy is now assessed using a confusion matrix. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | This section (<i>AUDef</i> Appendix 1 A A1.4.3 Step 1 Accuracy Assessment of the Jurisdictional FCBM) has been significantly revised. |
| Comment # | 102 |
| Question | General |
| Section | N/A |

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|---|---|
| Page relevant) (if) | 26 |
| Line relevant) (if) | N/A |
| Reviewer Organization | Clark University |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Remove any use of kappa because kappa is conceptually flawed (Pontius and Millones 2011, Foody 2020) https://www.tandfonline.com/doi/abs/10.1080/01431161.2011.552923 https://doi.org/10.1016/j.rse.2019.111630 |
| Verra Response | References to kappa have been removed from this document; this section (Appendix A A1.4.3 Step 1 Where Relevant, Integrate Project FCBMs into Jurisdictional FCBMs) now states "The average of the user's and producer's accuracies of the forest area at the end of the HRP, as calculated from the FCBMp, is greater by at least 5 percent than the same average calculated from the same spatial extent of the jurisdictional FCBM; and The average of the user's and producer's accuracies of the area of deforestation over the HRP, as calculated from the FCBMp, is greater by at least 5 percent than the same average calculated from the same spatial extent of the jurisdictional FCBM." |
| Aster Global Assessment | Module does not use Kappa as a metric of classification accuracy. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | References to kappa have been removed from this document; this section (Appendix 1 A A1.4.3 Step 1 Where Relevant, Integrate Project FCBMs into Jurisdictional FCBMs) now states "The average of the user's and producer's accuracies of the forest area at the end of the HRP, as calculated from the FCBMp, is greater by at least five 5 percent than the same average calculated from the same spatial extent of the jurisdictional FCBM; and The average of the user's and producer's accuracies of the area of deforestation over the HRP, as calculated from the FCBMp, is greater by at least five 5 percent than the same average calculated from the same spatial extent of the jurisdictional FCBM." |
| Comment # | 103 |
| Question | General |
| Section | N/A |
| Page relevant) (if) | 26 |
| Line relevant) (if) | N/A |
| Reviewer Organization | Clark University |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | The phrase "by at least 10%" is vague. Does the phrase mean ten percentage points higher than the lower metric or higher than ten percent of the lower metric? For example, if 60% is the lower metric, then 70% is ten percentage points higher while 66% is ten percent higher. |

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| Verra Response | Clarification is added to 5.5.3 "The sum of the project maps user and producer accuracy for the deforestation class is higher by at least 10% (e.g. if the producer's accuracy of the deforestation class of the FCBMj is 60%, it must be at least 70% in the FCBMp)." |
| Aster Global Assessment | The assessment team finds that the revised language has improved clarity. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>This comment refers to <i>AUDef</i> A1.4.3 Step 1 "Where Relevant, Integrate...." The percentage has be adjusted to five percent.</p> <p>Clarification is added to 5.5.3 "The sum of the project maps user and producer accuracy for the deforestation class is higher by at least 10%". The following example is given to clarify how this works: "For example, where the jurisdictional FCBM, when assessed strictly within the boundaries of the FCBMp, is found to have average user's and producer's accuracies of 60–65 percent, the FCBMp must achieve average accuracies of 70 percent or greater to be incorporated."</p> |
| Comment # | 104 |
| Question | General |
| Section | N/A |
| Page (if relevant) | 26 |
| Line (if relevant) | N/A |
| Reviewer Organization | Clark University |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>What is the motivation to make the criterion the sum of user's and producer's accuracy of the deforestation category? Pontius thinks we should think in terms of quantity and allocation. If the less accurate map has 85% for both user's and producer's accuracy, then there is zero quantity error, which might serve our needs well. If the more accurate map has 100% user's accuracy and 85% producer's accuracy, then the map underestimates the quantity of deforestation, while the sum of user's and producer's accuracies are more than 10 percentage points higher than the less accurate map. Please read the first four chapters of the book Metrics That Make a Difference https://link.springer.com/book/10.1007/978-3-030-70765-1</p> |
| Verra Response | References to user's and producer's accuracies in this section (Appendix A A1.4.3 Step 1 Where Relevant, Integrate Project FCBMs into Jurisdictional FCBMs) have been retained because the total quantity of activity data apparent in the FCBM is less important that the positional accuracy (referred to as 'allocation' in the comment), and thus having balanced users and producers accuracy is not critical. Verra welcomes specific recommendations on alternative phrasing of this requirement for a later version of the module. |
| Aster Global Assessment | The assessment team is unclear about the underlying basis for the following: "total quantity of activity data apparent in the FCBM is less important that the positional accuracy (referred to as 'allocation' in the comment), and thus having balanced users and producers accuracy is not critical". Furthermore, the implication of "Verra welcomes specific recommendations on alternative phrasing of this requirement for a later version of the module." remains unclear. |

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| Aster Global Initial Findings | CL: Please address in line with the findings. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Verra is using the current data service providers to explore the cost/benefits of approaches to accuracy for various forest types. Outcome from this first set of jurisdictions will inform adjustments to the accuracy standard if warranted.</p> <p>Explanation of original Verra Response: Verra has updated the response to reflect developments that have occurred since the original response, related to instructions given to current data service providers</p> <p>Response to additional points raised by Aster: Verra retracts its original comment and replaces it with the new one. Clark labs, provider of this comment, has provided Verra substantial additional feedback in the year+ following this original comment, and Verra has taken it into account with guidance to DSPs in their contracts.</p> |
| Aster Global Findings Round 2 | <p>Text on which the original public comment was based on i.e., “•The sum of the project maps user and producer accuracy for the deforestation class is higher by at least 10%.” has been removed. The updated criterion now is “•Where the FCBMp is shown to provide substantially more accurate estimates of the two main classes (area of deforestation over the HRP and area of forest at the end of HRP) than the jurisdictional FCBM, the FCBMp must replace the portions of the jurisdictional FCBM with which it intersects. “Substantially more accurate” is defined in this assessment as meeting both of the following conditions:</p> <p>i) The average of the user’s and producer’s accuracies of the forest area at the end of the HRP, as calculated from the FCBMp, is greater by at least 5 percent than the same average calculated from the same spatial extent of the jurisdictional FCBM; and</p> <p>ii) The average of the user’s and producer’s accuracies of the area of deforestation over the HRP, as calculated from the FCBMp, is greater by at least 5 percent than the same average calculated from the same spatial extent of the jurisdictional FCBM.”</p> <p>Verra has stated the original response is retracted and replaced with new which states accuracy standards will be adjusted if warranted based on the outcome of the first set of jurisdictions maps. Additionally, it is stated that Clark Labs, the original commenter has provided feedbacks and Verra has taken it into account with guidance to DSPs in their contracts. Therefore, the assessment team believes the developer has taken due account, and the comment can be closed.</p> |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Verra is using the current data service providers to explore the cost/benefits of approaches to accuracy for various forest types. Outcome from this first set of jurisdictions will inform adjustments to the accuracy standard if warranted. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 105 |
| Question | General |
| Section | N/A |

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| Page relevant) (if) | 26 |
| Line relevant) (if) | N/A |
| Reviewer Organization | Clark University |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Use the word “significant” if and only if the p-value less than alpha for a hypothesis test using inferential statistics. Documents that describe quantitative methods are extremely confusing when significant means statistically significant in some places but means large or important in other places. |
| Verra Response | Word changed to 'substantially' |
| Aster Global Assessment | This comment is a duplicate of another comment. N/A |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Word changed to 'substantially' |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 106 |
| Question | General |
| Section | 5.5.2. |
| Page relevant) (if) | 24 |
| Line relevant) (if) | N/A |
| Reviewer Organization | Quantil |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Taking into account the high costs of acquisition and processing of high resolution satellite images, it is recommended to carry out the FCBM's in the smallest jurisdiction level or even in a project level. In case of performing the analysis at the jurisdiction level, annual request should be considered depending on the start date of projects. |
| Verra Response | A consistent FCBM is developed for the jurisdiction by the 3rd party data developer. PPs may also develop project specific FCBMs encompassing their own project areas and leakage belts. |
| Aster Global Assessment | Th module requires FCBMs to be contracted by Verra to DSPs. Additionally, the assessment team deems this response to be sufficient. Verra has clarified that projects may make FCBMp and submit these; if deemed more accurate (as defined by A1.4.3.) these may be used. The assessment team finds this statement is in agreement with supplemental text found in Appendices of the module. |
| Status | closed R1 |

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| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | A consistent FCBM is developed for the jurisdiction by the 3rd party data developer. PPs may also develop project specific FCBMs encompassing their own project areas and leakage belts. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 107 |
| Question | General |
| Section | 5.1 |
| Page (if relevant) | 7 |
| Line (if relevant) | N/A |
| Reviewer Organization | Quantil |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | We kindly ask Verra for a historical geographic data base (polygons) of the VCS projects (including year of initiation) in order to identify size areas. This information will allow us to analyze satellite imagery availability, cost and demand of the service. |
| Verra Response | We note this request! |
| Aster Global Assessment | This request is outside of the scope of the Methodology and module. Verra has taken notice of the request. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | We note this request! |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 108 |
| Question | General |
| Section | 2 |
| Page (if relevant) | 3 |
| Line (if relevant) | N/A |
| Reviewer Organization | Quantil |

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| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | We deeply recommended to VERRA to carry out a case study for J-ADB-UD module (5.5.1 & 5.5.3 Step 1) and socialize its results in a webinar. This in order to guarantee a correct application of the methodology |
| Verra Response | We have tested various parts of <i>AUDef</i> and hope to make the results public soon. |
| Aster Global Assessment | Verra responded by stating it hopes to release a case study. The assessment team asks that Verra give a more definitive answer. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Verra acknowledges and welcomes that there is interest in case studies. There is no requirement that new methodologies be accompanied by case studies. However, Verra is pleased that it will be able to share results from some case studies, but cannot promise a timeline. All parties are welcome to test the approaches in the methodology using their own data.</p> <p>Explanation of original Verra response: Verra's response was correct, but Verra now reaffirms that validation of a methodology is not contingent on case studies or webinars, and the comment is therefore out of scope.</p> <p>Response to additional points raised by Aster: Comment is out of scope and Verra is not obligated to guarantee a timeline for release of any testing information.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated there is no requirement that new methodologies be accompanied by case studies and has flagged this comment as out of scope. Verra has determined this comment is out of scope and will not be covered in this assessment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Verra acknowledges and welcomes that there is interest in case studies. There is no requirement that new methodologies be accompanied by case studies. However, Verra is pleased that it will be able to share results from some case studies, but cannot promise a timeline. All parties are welcome to test the approaches in the methodology using their own data. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 109 |
| Question | General |
| Section | 5.4 |

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| Page relevant) | (if 9 |
| Line relevant) | (if N/A |
| Reviewer Organization | Quantil |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | In terms of technical specifications, there is no mention of whether the images should be orthorectified (accuracy criteria) and the desired georeferencing scale (e.g. 1:10.000 or 1:5.000). We request clarification on the level of offset and whether orthorectification of the images is required (e.g. from control point processing with the jurisdiction's geodetic network). |
| Verra Response | Text added in Section 5.5.1 step 1 Data Sources to describe requirement to use orthorectified imagery. |
| Aster Global Assessment | Step 1 in 5.5.1 states "Imagery should be orthorectified ...". It is unclear if this is required. |
| Aster Global Initial Findings | CL: Please clarify is the intent (e.g. should, must, may) |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Text added in ADef Section A1.4.1 5.5.4 step 1 Data Sources to describe requirement to use orthorectified imagery. |
| Comment # | 110 |
| Question | General |
| Section | 5.1.1 |
| Page relevant) | (if 14 |
| Line relevant) | (if N/A |
| Reviewer Organization | Quantil |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Has radar imaging been considered to resolve cloud obstruction? Radar images are more expensive due to high processing. In areas with high cloud cover it would not otherwise be possible to have a Historical Reference Period (HRP). |
| Verra Response | Radar or any other spatial data type may be used in following ways described throughout the module: 1) To develop a stratification approach to image sampling 2) to develop a project-specific forest cover benchmark map 3) to supplement and aid analysts in visual interpretation of high resolution imagery. |
| Aster Global Assessment | Verra responded by saying auxiliary spatial data can be integrated in numerous ways; first when projects delineate strata, second when projects propose their own FCBMp., third in interpretation of aerial imagery as auxiliary information. |
| Status | closed R1 |
| Response Updated | no |

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| Since Finding Closed? | |
| Revised Verra Response October 2023 | Radar or any other spatial data type may be used in following ways described throughout the module: 1) To develop a stratification approach to image sampling 2) to develop a project-specific forest cover benchmark map 3) to supplement and aid analysts in visual interpretation of high resolution imagery. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 111 |
| Question | General |
| Section | 5.5.3 |
| Page (if relevant) | 25 |
| Line (if relevant) | N/A |
| Reviewer Organization | Quantil |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | In page 8 (section 5.2) it says that "The Deforestation AD-C must be disaggregated into Planned and Unplanned Deforestation". In page 25, it indicates "Deforestation... must be represented with the pixel value 0". Therefore there is no distinction between unplanned and planned FCBMs. We kindly ask for further clarification. |
| Verra Response | See #88 |
| Aster Global Assessment | #88 refers to the definition of the historical reference period. The assessment team is unsure how that is germane to this comment. |
| Aster Global Initial Findings | CL: Please directly address original comment. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <p>1) This requirement is no longer included in the methodology. It is now replaced with "Deforestation must be disaggregated into at least: small-scale and large-scale unplanned deforestation. Other categories do not require disaggregation". Guidance on how to make this determination is provided in A1.4.1 Step 1 Data Collection.</p> <p>2) Tables 15 and 16 describe how to code various land cover and land cover change classes in the FCBM. There is no requirement to differentiate any sub-classes of deforestation based on driver</p> <p>Explanation of original Verra Response: Original comment was incorrectly referring to an unrelated comment and should be disregarded.</p> <p>Response to additional points raised by Aster: n/a</p> |
| Aster Global Findings Round 2 | The methodology developer has provided further clarification, stating that the initial comment referred to an inaccurate response. Guidance for differentiating between unplanned and planned deforestation is provided in A1.4.1 Step 1 Data Collection. Categories for land cover and land cover change in the FCBM are listed in Tables 15 and 16. This item is closed. |
| Status | closed R1 |

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| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | 1) This requirement is no longer included in the methodology. It is now replaced with "Deforestation must be disaggregated into at least: small-scale and large-scale UDef unplanned deforestation . Other categories do not require disaggregation". Guidance on how to make this determination is provided in <i>AUDef</i> A1.4.1 Step 1 Data Collection. 2) Tables 15 and 16 describe how to code various land cover and land cover change classes in the FCBM. There is no requirement to differentiate any sub-classes of deforestation based on driver |
| Comment # | 112 |
| Question | General |
| Section | 0 |
| Page (if relevant) | 0 |
| Line (if relevant) | N/A |
| Reviewer Organization | Quantil |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Have you considered using this methodology with UAV platforms (drones) with multispectral sensors? |
| Verra Response | Drone-based, or any other spatial data type may be used in following ways described throughout the module: 1) To develop a stratification approach to image sampling 2) to develop a project-specific forest cover benchmark map 3) to supplement and aid analysts in visual interpretation of high resolution imagery. |
| Aster Global Assessment | Verra responded by saying auxiliary spatial data can be integrated in numerous ways; first when projects delineate strata, second when projects propose their own FCBMp., third in interpretation of aerial imagery as auxiliary information. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Drone-based, or any other spatial data type may be used in following ways described throughout the module: 1) To develop a stratification approach to image sampling 2) to develop a project-specific forest cover benchmark map 3) to supplement and aid analysts in visual interpretation of high resolution imagery. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 113 |
| Question | 3 |
| Section | 6 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |

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| Reviewer Organization | Radicle Group |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | In Brazil, MapBiomass is an important tool regarding land-use-change and it utilizes a wall-to-wall mapping approach. However, the approach is based on a mosaic of different dates imagery. |
| Verra Response | 1) Any existing spatial data type may be used in following ways described throughout the module: 1) To develop a stratification approach to image sampling 2) to develop a project-specific forest cover benchmark map 3) to supplement and aid analysts in visual interpretation of high resolution imagery. 2) Following best practices outlined in "GFOI Integration of remote-sensing and ground-based observations for estimation of emissions and removals of greenhouse gases in forests," section 4.2, the estimate of deforestation area from a map must be adjusted using accuracy point samples. In Appendix 1, highly accurate land cover change maps can be used to define sampling strata for the point samples, and doing so will substantially reduce effort and improve precision. |
| Aster Global Assessment | Verra responded by saying auxiliary spatial data and in-situ observations can be integrated in numerous ways; first when projects delineate strata, second when projects propose their own FCBMp., third in interpretation of aerial imagery as auxiliary information. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | 1) Any existing spatial data type may be used in following ways described throughout the module: 1) To develop a stratification approach to image sampling 2) to develop a project-specific forest cover benchmark map 3) to supplement and aid analysts in visual interpretation of high resolution imagery. 2) Following best practices outlined in "GFOI Integration of remote-sensing and ground-based observations for estimation of emissions and removals of greenhouse gases in forests," section 4.2, the estimate of deforestation area from a map must be adjusted using accuracy point samples. In Appendix 1, highly accurate land cover change maps can be used to define sampling strata for the point samples, and doing so will substantially reduce effort and improve precision. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 114 |
| Question | 2 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including | Mangroves need to be able to be distinguished in the stratification process at some point. |

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| general questions & comments | |
| Verra Response | Wetlands have been removed from this methodology due to the ongoing consolidation of all tidal wetlands methodological elements in VM0033. |
| Aster Global Assessment | While the module states areas with >2% tidal wetland are not applicable, the methodology states "Note – A forthcoming update to VM0033 Methodology for Tidal Wetland and Seagrass Restoration will incorporate a jurisdictional approach to accounting for avoided unplanned and planned deforestation in tidal wetlands. Once the update to VM0033 is approved, an applicability condition will exclude tidal wetlands from this methodology. Until then, this methodology may be used with areas of tidal wetlands, the entire national extent of which must be defined as an additional jurisdiction, and soil carbon calculations, where relevant, must follow BL-TW and M-TW (VMD0050 and VMD0051)." |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: AUDef module has been updated to exclude wetlands immediately</p> <p>Explanation of original Verra Response: Verra's response incorrectly used the word 'methodology' when it should have used "AUDef module"</p> <p>Response to additional points raised by Aster: Comment referred to by Aster has been removed.</p> |
| Aster Global Findings Round 2 | The assessment team confirmed that removal of wetlands from the module is sufficient to close the identified finding. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | AUDef module has been updated to exclude wetlands; new Verra methodologies are under development to supplement UDef in wetland areas |
| Comment # | 115 |
| Question | 3 |
| Section | 6 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including general questions & comments | For mangroves, the GEM tool (https://www.mdpi.com/2072-4292/12/22/3758) has proven to be globally applicable and accurate. |

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| Verra Response | Wetlands have been removed from this methodology due to the ongoing consolidation of all tidal wetlands methodological elements in VM0033. |
| Aster Global Assessment | While the module states areas with >2% tidal wetland are not applicable, the methodology states "Note – A forthcoming update to VM0033 Methodology for Tidal Wetland and Seagrass Restoration will incorporate a jurisdictional approach to accounting for avoided unplanned and planned deforestation in tidal wetlands. Once the update to VM0033 is approved, an applicability condition will exclude tidal wetlands from this methodology. Until then, this methodology may be used with areas of tidal wetlands, the entire national extent of which must be defined as an additional jurisdiction, and soil carbon calculations, where relevant, must follow BL-TW and M-TW (VMD0050 and VMD0051)." |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: AUDef module has been updated to exclude wetlands immediately</p> <p>Explanation of original Verra Response: Verra's response incorrectly used the word 'methodology' when it should have used 'module'</p> <p>Response to additional points raised by Aster: Comment referred to by Aster has been removed.</p> |
| Aster Global Findings Round 2 | The assessment team confirmed that removal of wetlands from the module is sufficient to close the identified finding. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | AUDef module has been updated to exclude wetlands; new Verra methodologies are under development to supplement UDef in wetland areas |
| Comment # | 116 |
| Question | General |
| Section | 3.1 |
| Page (if relevant) | 3 |
| Line (if relevant) | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including general questions & comments | Should the definition of AD include degraded forest? |
| Verra Response | The definition of AD has been made more universal, and clarified that the module currently only applies to avoided deforestation. |
| Aster Global Assessment | The term "activity data" has no definition in the Methodology but is used in the document. The term "activity data" in the module is "Data on the magnitude of |

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| | deforestation taking place during a given period of time". Given the use of the term activity data in the context of this methodology, the limited scope of the definition is appropriate. However "magnitude" is vague. |
| Aster Global Initial Findings | CL: Define activity data in the Methodology OFI: Consider specificity in defining activity data. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: The term Activity Data is defined by the IPCC https://www.ipcc.ch/site/assets/uploads/2019/06/19R_V0_02_Glossary_advance.pdf , and includes a broad range of data types both applicable to and outside of the forestry sector. The applicability conditions state "Where the land use transition in the baseline scenario is forest land to non-forest land, meeting the definition of unplanned deforestation;" so by extension, activity data that describes a forest-to-forest transition is not applicable in this methodology. Explanation of original Verra Response: The module no longer defines activity data. Response to additional points raised by Aster: The term magnitude is included in the IPCC definition of activity data. |
| Aster Global Findings Round 2 | The assessment team confirmed that activity data is now included as a definition in the methodology, rather than the module. The assessment team notes that the definition of activity days used is consistent with the IPCC definition. As this finding was an OFI, no action was required by the methodology developer. This item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The term Activity Data is defined by the IPCC https://www.ipcc.ch/site/assets/uploads/2019/06/19R_V0_02_Glossary_advance.pdf , and includes a broad range of data types both applicable to and outside of the forestry sector. The applicability conditions state "Where the land use transition in the baseline scenario is forest land to non-forest land, meeting the definition of unplanned deforestation;" so by extension, activity data that describes a forest-to-forest transition is not applicable in this methodology. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 117 |
| Question | General |
| Section | 3.1 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including general | Include a definition of sampling strata. Nowhere is this detailed in the module. |

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| questions & comments | |
| Proposed Change(s) | Define sampling strata here and in the main narrative |
| Verra Response | A definition of Sampling Stratum is added to the Definitions section |
| Aster Global Assessment | The term "sampling strata" has no definition in the Methodology but is used in the document. The term "sampling strata" has no definition in the Module but is used in the document. |
| Aster Global Initial Findings | CL: Please provide a definition in the methodology and module for activity data |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Verra does not choose to add "Sampling stratum" as a defined term, because its application within this methodology is in line with the common use of that term in all area sampling. There is now a Table 5 which provides an illustrative example of stratification and further description of how they are constructed.</p> <p>Explanation of original Verra Response: Original response incorrectly referenced a definition of sampling stratum, however the AUDef module intentionally does not include a definition.</p> <p>Response to additional points raised by Aster: Original public comment refers to sampling stratum, not activity data. Activity data is defined by the IPCC.</p> |
| Aster Global Findings Round 2 | The assessment team concurs that the decision not to include a definition for "sampling stratum" is reasonable as it is consistent with the use of the term in area sampling. This item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Verra does not choose to add "Sampling stratum" as a defined term, because its application within this methodology is in line with the common use of that term in all area sampling. There is now a Table 5 which provides an illustrative example of stratification and further description of how they are constructed. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 118 |
| Question | General |
| Section | 3.1 |
| Page (if relevant) | 3-4 |
| Line (if relevant) | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including general | Definition of forest needs to be expanded to include mangroves. |

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| questions & comments | |
| Proposed Change(s) | Suggested addition to footnote: Mangrove forests are excluded from any tree height requirement in a forest definition, as they consist of (close to) 100% mangrove species, which often do not reach the same height as other tree species and occupy contiguous areas, and their functioning as a forest is independent of tree height. From BL-UD |
| Verra Response | Wetlands have been removed from this methodology due to the ongoing consolidation of all tidal wetlands methodological elements in VM0033. |
| Aster Global Assessment | While the module states areas with >2% tidal wetland are not applicable, the methodology states "Note – A forthcoming update to VM0033 Methodology for Tidal Wetland and Seagrass Restoration will incorporate a jurisdictional approach to accounting for avoided unplanned and planned deforestation in tidal wetlands. Once the update to VM0033 is approved, an applicability condition will exclude tidal wetlands from this methodology. Until then, this methodology may be used with areas of tidal wetlands, the entire national extent of which must be defined as an additional jurisdiction, and soil carbon calculations, where relevant, must follow BL-TW and M-TW (VMD0050 and VMD0051)." |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: AUDef module has been updated to exclude wetlands immediately</p> <p>Explanation of original Verra Response: Verra's response incorrectly used the word 'methodology' when it should have used ""AUDef module""</p> <p>Response to additional points raised by Aster: Comment referred to by Aster has been removed.</p> |
| Aster Global Findings Round 2 | The assessment team confirmed that removal of wetlands from the module is sufficient to close the identified finding. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | AUDef module has been updated to exclude wetlands; new Verra methodologies are under development to supplement UDef in wetland areas |
| Comment # | 119 |
| Question | General |
| Section | 3.1 |
| Page (if relevant) | 5 |
| Line (if relevant) | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including | '...any natural regeneration, afforestation or reforestation occurring on lands that are non-forest at the beginning of a period (HRP or Baseline Validity Period (VP)) cannot |

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| general questions & comments | be converted to a “forest” during that same period.'. This makes sense for the first baseline validity period but what about the 2nd onwards (e.g. after 12 years)? |
| Proposed Change(s) | If a project includes ARR or RWE in its other activities, in next to AUD, then these areas should be excluded from the HRP analysis (similar wording to the exclusion of 'Total AFOLU Project Area' in the leakage module). |
| Verra Response | ARR and RWE will be addressed by complementary methodologies that can be used concurrent with this one. |
| Aster Global Assessment | Verra responses with reference to using multiple methodologies; the original comment asked if ARR or RWE projects are excluded from the HRP analysis. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: No project areas are excluded from the jurisdictional sampling frame for generating activity data, regardless of methodology of project, except in the case where some or all areas of those projects meet the definition of an identified exclusion described in table 11.</p> <p>Explanation of original Verra Response: Updated response focuses more on the main concern of original comment, which is related to the removal of project areas from the jurisdictional sampling frame.</p> <p>Response to additional points raised by Aster: n/a</p> |
| Aster Global Findings Round 2 | The methodology developer has clarified that no project areas will be excluded from the jurisdictional sampling frame for generating activity data. The assessment team determined that this response addresses the commenter's question regarding exclusion of ARR or RWE projects. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | No project areas are excluded from the jurisdictional sampling frame for generating activity data, regardless of methodology of project, except in the case where some or all areas of those projects meet the definition of an identified exclusion described in AUDef Table 11. |
| Comment # | 120 |
| Question | General |
| Section | 5.4 |
| Page (if relevant) | 9 |
| Line (if relevant) | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including general questions & comments | During development of the module there was a discussion about including an option for tidal wetlands forest (e.g. mangroves) to limit the analysis to this biome, because drivers, agents and trends may be quite different from the terrestrial situation, and including an entire jurisdiction for just a mangrove conservation project might overburden the project. Can the module allow for this limited analysis, e.g. for just one LCT or AD Category if it is mangrove? |

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| Verra Response | Wetlands have been removed from this methodology due to the ongoing consolidation of all tidal wetlands methodological elements in VM0033. |
| Aster Global Assessment | While the module states areas with >2% tidal wetland are not applicable, the methodology states "Note – A forthcoming update to VM0033 Methodology for Tidal Wetland and Seagrass Restoration will incorporate a jurisdictional approach to accounting for avoided unplanned and planned deforestation in tidal wetlands. Once the update to VM0033 is approved, an applicability condition will exclude tidal wetlands from this methodology. Until then, this methodology may be used with areas of tidal wetlands, the entire national extent of which must be defined as an additional jurisdiction, and soil carbon calculations, where relevant, must follow BL-TW and M-TW (VMD0050 and VMD0051)." |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: AUDef module has been updated to exclude wetlands immediately</p> <p>Explanation of original Verra Response: Verra's response incorrectly used the word 'methodology' when it should have used 'module'"</p> <p>Response to additional points raised by Aster: Comment referred to by Aster has been removed.</p> |
| Aster Global Findings Round 2 | The assessment team confirmed that removal of wetlands from the module is sufficient to close the identified finding. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | AUDef module has been updated to exclude wetlands; new Verra methodologies are under development to supplement UDef in wetland areas |
| Comment # | 121 |
| Question | General |
| Section | 5.5.1 |
| Page (if relevant) | 11 |
| Line (if relevant) | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including general questions & comments | The procedure states that historical estimates of the area of each LCT and AD Category are developed for the Historical Reference Period within the Jurisdiction's geographic boundary. For conservation projects that cover all the forested land (e.g. mangrove conservation covering the entire biome within a jurisdiction - examples exist), the first baseline validity period will yield ERs based on the historic deforestation rate. However, for the second VP, the project has become its own baseline and ERs drop to zero. The accounting window of just 6 years may be unattractive for project developers, but more importantly, the loss of carbon finance may undermine the conservation projects viability. |

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| Proposed Change(s) | At a minimum, the module should recognize and flag this potential situation, if procedures remain as they are. An additional procedure for this situation could involve an assessment of the relative contribution of carbon finance to the change in behavior (reminiscent of methods in an additionality test). This may include governance, livelihoods, policies in absence of carbon finance at the end of a VP. The outcome will not be a quantitative trend of continued deforestation in the baseline during subsequent VP, but at least a basis for the acknowledgement that ERs will be achieved if the project continues into the next VP. Verra may consider allowing continued ER claims for a number of VPs, with a decline in baseline emission levels towards zero at the end of the final eligible VP. |
| Verra Response | While we recognize this challenge, VCS project areas will be included in the jurisdiction. In the jurisdictional allocation approach, projects no longer construct a "reference region" (Appendix 1 A1.2.1). |
| Aster Global Assessment | VCS project areas are included and not listed as potential exclusion areas. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | While we recognize this challenge, VCS project areas will be included in the jurisdiction. In the jurisdictional allocation approach, projects no longer construct a "reference region" (see AUDef Appendix 1 A1.2.1). |
| Comment # | 122 |
| Question | General |
| Section | 5.5.1 |
| Page (if relevant) | 12 |
| Line (if relevant) | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including general questions & comments | Footnote 6 missing. |
| Verra Response | No longer applies due to revised structure |
| Aster Global Assessment | The assessment team has not identified any missing footnotes in the current draft version. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | No longer applies due to revised structure |
| Aster Global Assessment | The assessment team confirmed that no changes were made to the initial response. No further review is required. |

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| of Revised Response | |
| Comment # | 123 |
| Question | 2 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | "Forest Islands", Projects in the border of the jurisdiction sharing multiple frontiers; particular ecosystems such as wetlands without representative ecosystems in the surrounding areas; protected areas and national parks surrounded by areas with different managements. |
| Verra Response | Appendix 1 A1.2.1: Verra will define all reference regions, in consultation with governments, existing REDD programs, project proponents, and may utilize definitions based on administrative units, or geographic factors such as ecosystems, or watersheds |
| Aster Global Assessment | The assessment team is unable to find the language used by the Verra response. The assessment team notes A1.2.1 defines jurisdictional boundaries as "• The national boundaries may always be used as the jurisdiction. • Where there is a clear expression of government intent to use alternative boundaries in developing jurisdictional REDD programs (e.g., those included in a submission of a FREL to the UNFCCC or a submission to the FCPF's Carbon Fund, the BioCF ISFL or to ART/TREES), the boundaries of a government's jurisdictional REDD+ programme may be used. Only in this case may boundaries be defined using biomes, water catchment areas.A1." However, the assessment team is unclear how this directly addresses the comment. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: It is not clear to Verra what this comment refers to, it is only a list of landscape characteristics. Verra cannot provide a response. Explanation of original Verra Response: The original response attempted to provide context around the definition of the jurisdiction, although it is not clear such information responds to the original intent of the comment. Response to additional points raised by Aster: The original comment cannot be addressed as it provides no recommendations or critiques. Aster may refer to table 18 to note a statement around Verra's final authority in defining jurisdictional boundaries. |
| Aster Global Findings Round 2 | The assessment team concurs that this comment cannot be addressed. Additional clarification is provided regarding the initial response. This item is addressed. |
| Status | closed R2 |
| Response Updated | no |

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| Since Finding Closed? | |
| Revised Verra Response October 2023 | It is not clear to Verra what this comment refers to, it is only a list of landscape characteristics. Verra cannot provide a response. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 124 |
| Question | 3 |
| Section | 6 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | It is important to clarify that independent of the mapping approach, a single approach is not guaranteed to be accurate and reliable, forest ecosystems around the world are so diverse that standardized processes tend to underestimate forest areas. |
| Verra Response | The specific approach to identifying forests using imagery will vary between jurisdictions based on the SOP customized to each landscape. The general approach of using high resolution imagery as a primary source will remain the same across jurisdictions, but the interpretation guidelines, forest definitions, and use of ancillary datasets may differ substantially |
| Aster Global Assessment | The assessment team finds that the process, as laid out in appendix 1 will be the same for every jurisdiction, but the SOPs and individual inputs will vary by jurisdiction, data service provider and supplemental data submitted by stakeholders. The assessment team finds the text of appendix 1 is congruent with Verra's response. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The specific approach to identifying forests using imagery will vary between jurisdictions based on the SOP customized to each landscape. The general approach of using high resolution imagery as a primary source will remain the same across jurisdictions, but the interpretation guidelines, forest definitions, and use of ancillary datasets may differ substantially |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 125 |
| Question | General |
| Section | 5.4 |
| Page (if relevant) | 9 |

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| Line (if relevant) | 15 |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | Jurisdictions based on administrative boundaries is a simple way to standardize a process and will respond to political actions and not to social dynamics. |
| Proposed Change(s) | Jurisdictional boundaries based on watersheds are recommended because they respond to the same ecosystemic, environmental and social dynamics. Likewise, there are proposals that define them at a global level at different scales. |
| Verra Response | Appendix 1 A1.2.1: Verra will define all reference regions, in consultation with governments, existing REDD programs, project proponents, and may utilize definitions based on administrative units, or geographic factors such as ecosystems, or watersheds |
| Aster Global Assessment | The assessment team notes A1.2.1 may use water catchment areas as information used to delineate boundaries. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | AUDef Appendix 1 A1.2.1: Verra will define all reference regions, in consultation with governments, existing REDD programs, project proponents, and may utilize definitions based on administrative units, or geographic factors such as ecosystems, or watersheds |
| Comment # | 126 |
| Question | General |
| Section | 5.1 |
| Page (if relevant) | 7 |
| Line (if relevant) | N/A |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | "...The J-ADB-UD Description Report shall identify the spatial boundaries of any registered AFOLU carbon Projects and associated Leakage Belts, proposed VCS projects in the VCS Project Pipeline, and any additional forthcoming (where known) VCS AUD projects..." What would be the process required to identify the spatial boundaries of pipeline and additional forthcoming projects? |
| Proposed Change(s) | Once a new J-ABD-UD is requested there should be a open period (e.g. 30 days) and a webpage/site in which developers can submit areas for projects in early stages, this would allow for submitting forthcoming and early development projects and also to divide the costs of doing the J-ABD-UD in multiple developers |
| Verra Response | Per Appendix 1 Section A1.1, information about VCS registered and pipeline projects will be provided to the proponent in the <i>AD Baseline Allocation Report</i> . It is unrealistic to expect Verra or project proponents to know the details of other projects. |

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| Aster Global Assessment | A3.3.2 states "The process of developing AD for each jurisdiction must be documented in the description report for the purpose of validation by a Verra-contracted VVB.". It is unclear what a description report is as that term is not used elsewhere in the draft. |
| Aster Global Initial Findings | CL: Please clarify in line with findings |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: 1) The term "AD Baseline Allocation Report" is now used in place of "J-ADB-UD Description Report" and is described in A1.1 and A3.1. 2) Because AD allocation is undertaken by Verra's selected data service provider, all spatial information regarding pipeline projects will be made available to the exercise by Verra. For unlisted 'forthcoming' projects, Verra can only possibly know the details of those projects that have previously indicated to Verra that they intend to list in the registry. Forthcoming projects not yet listed, are encouraged in section A3.1 to list with Verra as "under development" as early as possible in the process to ensure that they are eligible to receive AD allocation. Verra therefore expects that all projects making clear progress towards validation will actively provide their spatial information in time to receive AD allocation for the forthcoming baseline validity period.</p> <p>Explanation of original Verra Response: Comment updated to refer to the current term which is "AD Baseline Allocation Report"</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | <p>The assessment team confirmed that the identified passage has been removed, and that the updated AD Baseline Allocation Report is now used consistently throughout the module.</p> <p>The methodology developer has provided additional context regarding spatial information of pipeline projects, sufficient to address the public comment.</p> |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>1) The term "AD Baseline Allocation Report" is now used in place of "J-ADB-UD Description Report" and is described in AUDef A1.1 and A3.1. 2) Because AD allocation is undertaken by Verra's selected data service provider, all spatial information regarding pipeline projects will be made available to the exercise by Verra. For unlisted 'forthcoming' projects, Verra can only possibly know the details of those projects that have previously indicated to Verra that they intend to list in the registry. Forthcoming projects not yet listed, are encouraged in section AUDef A3.1 to list with Verra as "under development" as early as possible in the process to ensure that they are eligible to receive AD allocation. Verra therefore expects that all projects making clear progress towards validation will actively provide their spatial information in time to receive AD allocation for the forthcoming baseline validity period.</p> |
| Comment # | 127 |
| Question | General |
| Section | 5.3 |
| Page (if relevant) | 9 |
| Line (if relevant) | 6 - 10 |
| Reviewer Organization | South Pole |

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| Reviewer Country | Global |
| Response(s) - including general questions & comments | The start and end dates of the JBVP and HRP seems to contradict in such paragraphs. You are talking about six months and then one year. |
| Proposed Change(s) | Stick to one value so the paragraph does not have a contradiction |
| Verra Response | The HRP is defined in <i>M0184, Methodology for reducing emissions from deforestation and degradation</i> and the <i>VCS Methodology Requirements</i> |
| Aster Global Assessment | The assessment team is unaware of a definition of HRP in the VCS Methodology Requirements |
| Aster Global Initial Findings | CL: Please clarify in line with findings |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <p>1) The HRP is defined in M0184 <i>Methodology for reducing emissions from deforestation and degradation</i>; that definition refers to a relevant section of the <i>Methodology Requirements</i>. It is no longer defined in this module.</p> <p>2) Other passages within the UDef module refer to dates associated with the HRP, but these passages focus on the eligibility of data in relation to the HRP. Different standards are used for different purposes:</p> <p>2a) Individual high resolution images may be sourced from a temporal window +/- 365 days from the start and end dates of the HRP (A1.4.1)</p> <p>2b) The difference between HRP_start and HRP_end (as calculated from average dates of high res imagery observed within sample plots) must be within +/- six months of the nominal length of the HRP (e.g. for a HRP of 10 years, the difference in HRP_start and HRP_end cannot be outside of 9.5-10.5 years)</p> <p>Explanation of original Verra Response: The definition is in Section</p> |
| Aster Global Findings Round 2 | The assessment team confirms that HRP is now defined in the methodology, not the module. Additional clarification is provided, sufficient to address the initial comment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>1) The HRP is defined in VM0048; that definition refers to a relevant section of the <i>VCS Methodology Requirements</i>. It is no longer defined in <i>AUDef</i> this module.</p> <p>2) Other passages within the AUDef module refer to dates associated with the HRP, but these passages focus on the eligibility of data in relation to the HRP. Different standards are used for different purposes:</p> <p>2a) Individual high resolution images may be sourced from a temporal window +/- 365 days from the start and end dates of the HRP (A1.4.1)</p> <p>2b) The difference between HRP_start and HRP_end (as calculated from average dates of high res imagery observed within sample plots) must be within +/- six months of the nominal length of the HRP (e.g. for a HRP of 10 years, the difference in HRP_start and HRP_end cannot be outside of 9.5-10.5 years)</p> |
| Comment # | 128 |
| Question | General |
| Section | 5.5 |

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| Page relevant) (if | 11 |
| Line relevant) (if | N/A |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | The steps defined in Page 11 are not developed accordingly in the sections of the module |
| Proposed Change(s) | Organize the diagram to align it with the steps explained in the module |
| Verra Response | Figures have been edited to better align with text. |
| Aster Global Assessment | The comment asked if the Figure (Now Fig 4 in A1.4) could be formatted to align with the steps described in-text. The assessment team acknowledges additional specificity has been added to Figure 4 but it does not align to the steps outlined in the text. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Figure 3 in A1.4 now updated to align with section text</p> <p>Explanation of original Verra Response: additional edits have been made since original verra comment</p> <p>Response to additional points raised by Aster: n/a</p> |
| Aster Global Findings Round 2 | <p>The assessment team notes that Figure 3 in A1.4 now largely aligns with section text. However, there are minor typos/inconsistencies.</p> <p>-Step 1: includes the word "step" before "develop a historical..."</p> <p>-Step 2: The section header is titled "Calculate the Total Historical Area of Each Change Category." The text in Figure 4 is listed as "Calculate the Total Historical Area of Each Change Category Change Dataset"</p> <p>-The steps under "Determine the Jurisdictional AD for Unplanned Deforestation" in Figure 4 align with the text in the relevant section, but the explicit steps are not identified as in other sections.</p> |
| Round 2 NCR/CL/OFI2 | CL: Please clarify in line with the findings. |
| Round 2 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Figure 4 in has been updated to reflect the current process outlined in Section A1.4.</p> <p>Response to Aster Round 2 CL: Updated text of the diagram to more closely align with section text; some section text altered in tracked changes.</p> |
| Aster Global Findings Round 3 | Revisions to the most recent version of the Module (v0.6) have addressed this finding. Figure 3 now better outlines the steps of the Allocation of jurisdictional deforestation AC to PAS and LBs. |
| Status | closed R3 |
| Response Updated | wording/typo updates |

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| Since Finding Closed? | |
| Revised Verra Response October 2023 | Figure 4 in has been updated to reflect the current process outlined in <i>AUDef</i> Section A1.4. |
| Comment # | 129 |
| Question | General |
| Section | N/A |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | Where will the information be stored and in which platform can be download? Will there be free access to the baseline data? If not, what will be the cost to access to the baseline data? What will be the accuracy of the outcome information that will be delivered by Verra? If we are a Verra provider, ¿will the use of the JNR Allocation Tool and JNR Risk Mapping Tool be licensed?¿What different types of licenses will these tools have? ¿What will be the cost of using each of these licenses? ¿What are the specifications of each type of license? What restrictions of use will the information have? What exactly will VERRA deliver together with the allocation report (shapefiles, kml, raster, documents, maps, images)? |
| Verra Response | Interplay between PPs and Verra to be further refined in AUD Methodological Guide |
| Aster Global Assessment | The assessment team is unable to determine whether or not the developer has taken due account of this comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: 1) At the time of the public comments period, Verra had not yet determined the approach to be used for data storage and the access administration scheme. These are now under construction. 2) All datasets will meet minimum accuracy standards specified in the methodology and the module. 3) The RMT and AT will be freely and publicly available to stakeholders. However, production of jurisdictional risk maps and allocation of projects' baselines will be carried out by Verra or its contractors. 5) Verra has not yet drafted contractual language regarding use of intellectual property surrounding tools applied by data service providers 6) Verra will deliver sufficient spatial and nonspatial data required for project proponents to construct baselines, and broadly speaking will include spatial maps of risk zones in the PA and LB, and an associated table of AD for each risk category. The exact file formats have not yet been finalized but Verra will ensure that all of them are standard, commonly used formats. Explanation of original Verra Response: Verra's response is accurate, but additional context is provided. |

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| | Response to additional points raised by Aster: All of these questions are about the broader process of how Verra will conduct and oversee data and information administration and do not pertain to the methodology or the module themselves. Verra deems these questions to be out of scope of this assessment. Verra has provided additional context. |
| Aster Global Findings Round 2 | The assessment team received guidance from Verra that the Methodology Developer is not required to address these public comments as they are out of scope of a methodology assessment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>1) At the time of the public comments period, Verra had not yet determined the approach to be used for data storage and the access administration scheme. These are now under construction.</p> <p>2) All datasets will meet minimum accuracy standards specified in the methodology and the module.</p> <p>3) The <i>Unplanned Deforestation Risk Mapping and Allocation Tool</i> RMT and AT will be freely and publicly available to stakeholders. However, production of jurisdictional risk maps and allocation of projects' baselines will be carried out by Verra or its contractors.</p> <p>5) Verra has not yet drafted contractual language regarding use of intellectual property surrounding tools applied by data service providers</p> <p>6) Verra will deliver sufficient spatial and nonspatial data required for project proponents to construct baselines, and broadly speaking will include spatial maps of risk zones in the PA and LB, and an associated table of AD for each risk category. The exact file formats have not yet been finalized but Verra will ensure that all of them are standard, commonly used formats.</p> |
| Comment # | 130 |
| Question | 2 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Systemica |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | <p>The Systemic company aims to develop highly qualified projects, to understand in practice what is being proposed by VERRA, our company developed the risk map with the new proposed methodology. Concerning this experience, there are a few points that still need to be discussed. Firstly, there was great difficulty in generating the maps, as it requires a high technical level and requires a lot of setting/running time, mainly in large areas, as is the case of regions in Brazil. Although the proposed methodology has a good performance with R^2 greater than 0.85 in the tested areas (Amazonas, Pará, Mato Grosso, Colniza, etc., see figures 1, 2, 3 and 4 in the spreadsheet 'Results'), there is an error dilution owing to vast territory application. In addition, when time is used as a projection reference, there is a problem with areas where the deforestation pattern is unconsolidated. Trancoso R. (2021) emphasizes the change in deforestation patterns in the Amazon with an increase of 61% deforestation polygons comparing the 10-year previous. Moreover, there are high impact deforestation drivers (such as roads and rivers) that are not considered, resulting in</p> |

underestimated deforestation by the model. In the model, only one driver is used, that is the distance to past deforestation. Roads drive deforestation by attracting migrant workers, resulting in boosting investment in previously inaccessible forest areas. In the Amazon, not only do roads stimulate deforestation, which increases the profitability of agriculture and livestock, but also roads influence land speculation and deforestation to establish and defend land tenure. Major highways were accompanied by a network of minor roads built by loggers, miners, and others. Deforestation is spreading outward from the highway and its access roads. Also, there are migration pathways for landless farmers and others, pushing deforestation into adjacent areas (Philip Fearnside, 2015). The herringbone deforestation pattern found in regions of Brazil and Ecuador is attributed to this road impact (Andrés Viña, F. R. E. and Rundquist, D. C., 2004, and Maurano L.E.P. et al., 2019). Aragão L.E.O.C. et al. (2021) emphasize the deforestation hotspots at the margins of the BR-319 in the Amazon about 90% of the direct influence zone of this highway is composed of preserved pristine vegetation. So, deforestation alerts increased significantly and directly influenced the zone of roads. The image is an example of de JNR Risk Map of Colniza-MT, made with PRODES deforestation dataset, that the black color is 0 risk and the red color is the higher risk. There is a calibration map between 2016 and 2019, where the yellow patches are the deforestation from 2019 to 2021, and the pink line is the secondary roads. As pointed out with a red arrow, some deforestation areas correspond to the 0 risk class on the risk map. The gap in the risk map also proves that the roads are a crucial driver of deforestation in the Amazon and necessary to consider. In addition, this city has consolidated deforestation, however, in areas where deforestation is expanding (like the south of Amazonas state), the risk map can be underestimated the deforestation more than this example, as the risk map only considers the historical deforestation. Another risk mapping approach can be used considering drivers, such as (i) Dinamica-EGO (Soares-Filho et al., 2002) uses the weights of evidence method (Bonham-Carter, 1994), which generates a map of change potential based on a set of explanatory variables; (ii) Land Change Modeller (Eastman & Toledano, 2018); (iii) CLUE (Verburg & Overmars, 2009); and (iii) GEOMOD (Pontius Jr et al., 2006). All these models work from "factor maps" in which the input variables are used to explain deforestation patterns and make future projections.

Trancoso, R. (2021). Changing Amazon deforestation patterns: urgent need to restore command and control policies and market interventions. *Environmental Research Letters*, 16(4), 041004.

Fearnside, P. M. (2015). Amazon dams and waterways: Brazil's Tapajós Basin plans. *Ambio*, 44(5), 426-439.

Maurano, L. E. P., Escada, M. I. S., & Renno, C. D. (2019). Padrões espaciais de desmatamento e a estimativa da exatidão dos mapas do PRODES para Amazônia Legal Brasileira. *Ciência florestal*, 29, 1763-1775.

Viña, A., Echavarría, F. R., & Rundquist, D. C. (2004). Satellite change detection analysis of deforestation rates and patterns along the Colombia–Ecuador border. *AMBIO: A Journal of the Human Environment*, 33(3), 118-125.

Mataveli, G. A., Chaves, M. E., Brunzell, N. A., & Aragão, L. E. (2021). The emergence of a new deforestation hotspot in Amazonia. *Perspectives in Ecology and Conservation*, 19(1), 33-36.

Soares Filho, C. V., de Andrade Rodrigues, L. R., & Perri, S. H. V. (2002). Produção e valor nutritivo de dez gramíneas forrageiras na região Noroeste do Estado de São Paulo. *Acta Scientiarum. Agronomy*, 24, 1377-1384.

Bonham-Carter, G. F., & Bonham-Carter, G. (1994). *Geographic information systems for geoscientists: modelling with GIS* (No. 13). Elsevier.

Etemadi, H., Smoak, J. M., & Karami, J. (2018). Land use change assessment in coastal mangrove forests of Iran utilizing satellite imagery and CA–Markov algorithms to monitor and predict future change. *Environmental earth sciences*, 77(5), 1-13.

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| | <p>Verburg, P. H., & Overmars, K. P. (2009). Combining top-down and bottom-up dynamics in land use modeling: exploring the future of abandoned farmlands in Europe with the Dyna-CLUE model. <i>Landscape ecology</i>, 24(9), 1167-1181.</p> <p>Pontius Jr, R. G., & Chen, H. (2006). GEOMOD modeling. Clark University.</p> |
| Verra Response | To be addressed through revisions to the UDef-RP |
| Aster Global Assessment | The assessment team is unable to determine whether or not the developer has taken due account of this comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Verra acknowledges that drivers of deforestation vary among jurisdictions. The risk modeling tool will allow data service provers to test and compare a multitude of deforestation models and look at any potentially relevant drivers. Project proponents, governments, and other parties are encouraged to submit recommendations to the selected data service provider for a jurisdiction of interest regarding drivers of deforestation and modeling approaches.</p> <p>Explanation of original Verra Response: Verra correctly responds that questions pertaining to the generation of risk maps are out of scope of the AUDef module. However, Verra provides additional context for clarity.</p> <p>Response to additional points raised by Aster: n/a</p> |
| Aster Global Findings Round 2 | The assessment team received guidance from Verra that the Methodology Developer is not required to address these public comments as they are out of scope of a methodology assessment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | significant change |
| Revised Verra Response October 2023 | These concerns were taken into account in revising <i>VT0007 Unplanned Deforestation Risk Mapping and Allocation Tool</i> . The benchmark approach set out in that document does not consider the factors suggested by the commenter, but stakeholders are invited to submit such data for alternative risk maps that will be tested against the benchmark map. |
| Comment # | 131 |
| Question | 3 |
| Section | 6 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Systemica |
| Reviewer Country | Brazil |
| Response(s) - including | In the context of Amazon biome, there are many approaches that can produce LUCC wall-to-wall maps with good accuracies, like combining artificial intelligence and |

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| <p>general questions & comments</p> | <p>multiple sources. Several approaches were made last year with SAR images, from Sentinel 1. This sensor is able to obtain ground information on the presence of clouds, which is common in the Amazon during the rainy season. Diniz et. al (2019) produces maps with Random Forest using SAR images, generating maps with 82.7% of accuracy. Dal Molin Jr & Rizzoli (2022) used Sentinel-1 images and a convolutional neural network (CNN) for multi-layer (multitemporal) semantic segmentation, capable of producing maps with 90% of accuracy. The combination of multiple sources such as SAR and multispectral images can promote a better classification since it's possible to obtain more attributes to describe the LUC classes, as Yordanov & Brovelli (2021) got 93% of global accuracy. Some other approaches using multispectral images can produce wall-to-wall maps, like the linear spectral mixture model (LSMM) that decompose the pixel spectrum of an image on different components (fraction images), the endmembers, like vegetation, water, and bare (KESHAVA, 2003). This approach was used in the TerraClass project (Almeida et. al, 2016) and other papers (Shimabukuro et al, 2019). There are some programs in Brazil that already produces wall-to-wall maps of the Amazon Forest, like PRODES which uses Landsat images, LSMM, and visual interpretation to map the deforestation (Almeida et. al, 2021; Valeriano et. al, 2000). Also can mention the Mapbiomas project, which is formed by universities, NGOs, and companies and developed an automatic classification method to produce a time series of maps of land use and land cover of Brazil, from 1985 to the present, and more recently, in other Latin American countries (MAPBIOMAS, 2021).</p> <p>REFERENCES: Almeida, C. A. D., Coutinho, A. C., Esquerdo, J. C. D. M., Adami, M., Venturieri, A., Diniz, C. G., & Gomes, A. R. (2016). High spatial resolution land use and land cover mapping of the Brazilian Legal Amazon in 2008 using Landsat-5/TM and MODIS data. <i>Acta Amazonica</i>, 46, 291-302. Almeida, C. A., Maurano, L. E. P., de Morisson Valeriano, D., Camara, G., Vinhas, L., Gomes, A. R., ... & Amaral, S. (2021) Metodologia para monitoramento da floresta usada nos projetos PRODES e DETER INPE. Diniz, J. M. F. D. S., Gama, F. F., & Adami, M. (2020). Evaluation of polarimetry and interferometry of sentinel-1A SAR data for land use and land cover of the Brazilian Amazon Region. <i>Geocarto International</i>, 1-19. Dal Molin Jr, R., & Rizzoli, P. (2022). Potential of Convolutional Neural Networks for Forest Mapping Using Sentinel-1 Interferometric Short Time Series. <i>Remote Sensing</i>, 14(6), 1381. MAPBIOMAS. Algorithm Theoretical Basis Documente (ATBD), collection 6, version 1.0. 2022. Valeriano, D. M., Mello, E. M., Moreira, J. C., Shimabukuro, Y. E., Duarte, V., Souza, I. M., ... & Souza, R. C. M. (2004). Monitoring tropical forest from space: the PRODES digital project. <i>International Archives of Photogrammetry Remote Sensing and Spatial Information Sciences</i>, 35, 272-274. Yordanov, V., & Brovelli, M. A. (2021). Deforestation Mapping Using SENTINEL-1 and Object-Based Random Forest Classification on Google Earth Engine. <i>The International Archives of Photogrammetry, Remote Sensing and Spatial Information Sciences</i>, 43, 865-872.</p> |
| <p>Verra Response</p> | <p>Following best practices outlined in "GFOI Integration of remote-sensing and ground-based observations for estimation of emissions and removals of greenhouse gases in forests," section 4.2, the estimate of deforestation area from a map must be adjusted using accuracy point samples. In Appendix 1, highly accurate land cover change maps can be used to define sampling strata for the point samples, and doing so will substantially reduce effort and improve precision. Projects can furthermore make project-specific FCBMs and submit them for comparison to the jurisdictional FCBM.</p> |

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| Aster Global Assessment | The assessment team has confirmed projects are allowed to make project-specific FCBMs and use these provided they meet the criteria of higher accuracy as laid out in the module. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Following best practices outlined in "GFOI Integration of remote-sensing and ground-based observations for estimation of emissions and removals of greenhouse gases in forests," section 4.2, the estimate of deforestation area from a map must be adjusted using accuracy point samples. In Appendix 1, highly accurate land cover change maps can be used to define sampling strata for the point samples, and doing so will substantially reduce effort and improve precision. Projects can furthermore make project-specific FCBMs and submit them for comparison to the jurisdictional FCBM. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 132 |
| Question | General |
| Section | 5.5.1 |
| Page (if relevant) | 14 |
| Line (if relevant) | Planned vs Unplanned Deforestation |
| Reviewer Organization | Systemica |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | <p>It's known that mostly deforestation in Brazil is unplanned, such as Mato Grosso state which had 97% of deforestation was illegal and the land conversion to soybean plantation (Trase et. al, 2020). More than 99% of deforestation alerts does not have vegetation suppression authorization registered by the government, and authorization is mandatory for activity legal in Brazil. Besides 39% of the deforestation alerts are overlapping with preservation areas, like permanent protection areas or legal reserve (MAPBIOMAS, 2021). In countries that have problems with governance, i.e. Brazil, distinguishing planned deforestation is difficult because the illegal deforestation increases every year. There are many reasons for this, one of them is the extension of the country that allows illegal deforestation of large areas due to a lack of surveillance. These areas can be classified as planned deforestation if considering only the visual interpretation of satellite images, even if this interpretation is refined. A report by initiatives that used open data to monitor deforestation in Brazil shows that it is a huge difficulty to distinguish legal deforestation from illegal deforestation using geospatial data of government institutions (such as permits and fines for deforestation) because they are missing or incomplete (Velho et. al., 2020). It's necessary to consider that to distinguish unplanned deforestation from planned deforestation the analyst needs an expertise of laws, properties and dynamics of the territory, and in the case of Amazon all these factors are very complex.</p> <p>REFERENCES Velho, B., Morgado, R., Bezerra, M., Siqueira, L., & Silva, J. (2020). Uso de dados abertos na prevenção, no monitoramento e no controle do desmatamento. Imaflora, Piracicaba. TRASE; IMAFLORA; ICV. 2020. "Desmatamento ilegal e exportações brasileiras de</p> |

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| | soja: o caso de Mato Grosso”. André Vasconcelos , Paula Bernasconi, Vinícius Guidotti3, Vinícius Silgueiro, Ana Valdiones, Tomás Carvalho , Helen Bellfield , Luis Fernando Guedes Pinto. Trase Issue Brief, v. 4. |
| Proposed Change(s) | A suggestion is to uses governmental open data to help and ensure that unplanned deforestation will not be classified as planned deforestation, otherwise will not reflect the jurisdiction reality. Even that data are incomplete, the use of these it's better than classification only with visual interpretation of pattern and proprieties of a satellite image, that is to subjective and depends to much of the interpreter. |
| Verra Response | See #88 |
| Aster Global Assessment | #88 refers to the definition of the historical reference period. The assessment team is unsure how that is germane to this comment. |
| Aster Global Initial Findings | CL: Please directly address original comment. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Verra acknowledges that there are many examples of deforestation that straddle the boundary between planned and unplanned deforestation, and that this is a particular challenge for countries with large scale illegal clearing for commercial agriculture like Brazil. In the current version of the module, there is no requirement that planned deforestation be exhaustively differentiated from unplanned. Rather, what exists is a requirement that where deforestation is observed in the sample dataset, that additional record is made if that area unambiguously meets a definition of planned deforestation. Verra supports 3rd party data developers in the use of ancillary datasets such as government records in making this determination. Interested parties are also encouraged to provide such information to data developers. With this guidance, areas where the identity as planned vs unplanned cannot be determined, the plot is recorded simply as deforestation. See a1.4.1 Step 1 Data Collection, condition b)</p> <p>Explanation of original Verra Response: Response incorrectly referred to another response and should be disregarded.</p> <p>Response to additional points raised by Aster: n/a</p> |
| Aster Global Findings Round 2 | The methodology developer has provided additional context regarding classification of planned vs. unplanned deforestation and clarified additional ways that referenced data could be incorporated. The assessment team determined this item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Verra acknowledges that there are many examples of deforestation that straddle the boundary between planned and unplanned deforestation, and that this is a particular challenge for countries with large scale illegal clearing for commercial agriculture like Brazil. In the current version of the module, there is no requirement that planned deforestation be exhaustively differentiated from unplanned. Rather, what exists is a requirement that where deforestation is observed in the sample dataset, that additional record is made if that area unambiguously meets a definition of planned deforestation. Verra supports 3rd party data developers in the use of ancillary datasets such as government records in making this determination. Interested parties are also encouraged to provide such information to data developers. With this guidance, areas where the identity as planned vs unplanned cannot be determined, the plot is recorded simply as deforestation. See AUDef A1.4.1 Step 1 Data Collection, condition (b) |
| Comment # | 133 |

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| Question | General |
| Section | 3 |
| Page (if relevant) | 5 |
| Line (if relevant) | N/A |
| Reviewer Organization | Systemiq |
| Reviewer Country | Germany |
| Response(s) - including general questions & comments | The module indicates that the reference period should be determined “according to the latest version of the VCS Standard.” However, the VCS standard does not yet specify a historical reference period. We understand that VERRA has engaged consultants to explore this question but further clarity is requested, with more specific language in the module. |
| Proposed Change(s) | We recommend that a minimum number of years be included as a reference period with the potential to increase that number based on justifiable project circumstances and that VERRA provide guidance on what those circumstances may be (e.g.: a spike in deforestation that is out of the norm over a shorter period). As a longer reference period generally allows for statistically more robust projections and more stability to project developers, we recommend it range from 10 to 15 years. |
| Verra Response | The HRP is defined in <i>M0184, Methodology for reducing emissions from deforestation and degradation</i> and the <i>VCS Methodology Requirements</i> |
| Aster Global Assessment | The assessment team is unaware of a definition of HRP in the VCS Methodology Requirements |
| Aster Global Initial Findings | CL: Please clarify in line with findings |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The definition of historical reference period (HRP) for Avoiding Unplanned Deforestation projects is set out in Section 3.4.15(2) of the <i>VCS Methodology Requirements v4.3</i> (HRP is defined in the methodology by referring to the <i>Methodology Requirements</i>). It has not been changed in recent years and will not be affected by the introduction of this methodology since it is a VCS Program level (and out of the scope of this methodology consultation).</p> <p>Explanation of original Verra response: The original response was correct, but we've added a section reference to the <i>VCS Methodology Requirements</i>.</p> <p>Response to additional points raised by Aster: Section 3.4.15(2): "The criteria and procedures for establishing the baseline scenario shall...set out criteria and procedures to identify where deforestation would likely occur using spatial analysis and projections...based on historical factors over at least the previous 10 years that explain past patterns and can be used to make future projections of deforestation."</p> |
| Aster Global Findings Round 2 | The Assessment Team determined the Historical Reference Period is not explicitly defined in the Methodology Requirements but points to the fact that the definition provided in v0.5 of the Methodology under review is congruent with Section 3.4.17(2). As 3.4.17(2)(a) uses the phrase "based on historical factors over at least the previous 10 years", the Assessment Team takes this to mean that the HRP can be any length of time of at least 10 years. This would appear to satisfy the commenter's suggestions that 1) a minimum number of years is indeed enforced, by means of the Meth. Req. as 10 years, and 2) a longer reference period exceeding 10 years is indeed permissible. |

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| | <p>Verra's response addressed the Commenter's Response but the Assessment Team asks Verra to respond to the proposed changes. The Assessment Team interprets that the "proposed" change is actually already in place, e.g. the HRP duration may be selected from a range with a specified minimum, however projects are not able to redefine the length of the historical reference period, as this role is not in the purview of projects. To directly address the public comment, Can Verra confirm or clarify?</p> |
| Round 2 NCR/CL/OFI2 | CL: Please clarify in line with the findings. |
| Round 2 Response from Methodology Developer | no response |
| Aster Global Findings Round 3 | <p>The Assessment Team determined the Historical Reference Period is not explicitly defined in the Methodology Requirements but points to the fact that the definition provided in v0.5 of the Methodology under review is congruent with Section 3.4.17(2). As 3.4.17(2)(a) uses the phrase "based on historical factors over at least the previous 10 years", the Assessment Team takes this to mean that the HRP can be any length of time of at least 10 years. This would appear to satisfy the commenter's suggestions that 1) a minimum number of years is indeed enforced, by means of the Meth. Req. as 10 years, and 2) a longer reference period exceeding 10 years is indeed permissible.</p> |
| Status | closed R4 |
| Response Updated Since Finding Closed? | significant change |
| Revised Verra Response October 2023 | <p>The definition of historical reference period (HRP) for Avoiding Unplanned Deforestation projects is set out in the <i>VCS Methodology Requirements</i> (HRP is defined in the methodology by referring to the <i>Methodology Requirements</i>). It has not been changed in recent years and will not be affected by the introduction of this methodology since it is a VCS Program level (and out of the scope of this methodology consultation).</p> <p>Section 3.4.15(2) of v4.4 of that document reads: "The criteria and procedures for establishing the baseline scenario shall...set out criteria and procedures to identify where deforestation would likely occur using spatial analysis and projections...based on historical factors over at least the previous 10 years that explain past patterns and can be used to make future projections of deforestation." We have chosen to instruct data service providers to collect data from the 10 years prior to the start of the jurisdictional baseline validity period since for a historical average baseline shorter periods have been found to be more accurate.</p> |
| Comment # | 134 |
| Question | General |
| Section | 5.4 |
| Page (if relevant) | 9 |
| Line (if relevant) | N/A |
| Reviewer Organization | Systemiq |
| Reviewer Country | Germany |

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| Response(s) - including general questions & comments | It is our understanding that the jurisdictional reference area exclude existing Verra projects, as including them would go counter to the VCS Baseline Scenario of "activities and GHG emissions that would occur in the absence of the project activity". However, this is not explicitly stated in the module. |
| Proposed Change(s) | Explicitly state that the reference area exclude an existing carbon projects to ensure that the reference area provides a counterfactual baseline, i.e.: without project scenario. |
| Verra Response | VCS project areas will be included in the jurisdiction. In the jurisdictional allocation approach, projects no longer construct a "reference region" (Appendix 1 A1.2.1). |
| Aster Global Assessment | The assessment team confirms VCS projects are included in the jurisdiction. And also that there is no 'reference region'. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | VCS project areas will be included in the jurisdiction. In the jurisdictional allocation approach, projects no longer construct a "reference region" (Appendix 1 A1.2.1). |
| Comment # | 135 |
| Question | General |
| Section | N/A |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Systemiq |
| Reviewer Country | Germany |
| Response(s) - including general questions & comments | <i>Risk map</i> . It is unclear whether project developers can propose risk maps to inform the AD allocated to their project area. If possible, there could be a scenario where there are multiple projects in a jurisdiction and project A provides a risk map but projects B and C do not. If this is the case, how will VERRA reconcile the risk across the jurisdiction? |
| Proposed Change(s) | Request that VERRA clarify whether a project can provide a risk map and what the procedures would need to be followed that risk map to supersede that of a VERRA contracted third party. |
| Verra Response | Addressed in Appendix 1 A1.4.3 Step 1. If only one project submits a qualifying project-level FCBM, only that area of the jurisdictional FCBM will be replaced. |
| Aster Global Assessment | The commenter asked about a risk map provided by the project. Verra replied with a statement on the FCBM maps. The assessment team deems this response not directly related to the original comment. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: A single consistent risk map is produced for the entire jurisdiction by the 3rd party data service provider. Project proponents are encouraged to submit to the data service provide any information, models, or datasets that may assist them in producing higher quality risk maps. The data service provide is not obligated to adopt any community submission of risk maps. Where the data service provider develops multiple competing risk maps, a standard accuracy metric, as defined in the risk mapping tool, will be |

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| | <p>applied to select the single risk map shared by all projects</p> <p>Explanation of original Verra Response: Response clarified to focus on risk maps, not FCBM.</p> <p>Response to additional points raised by Aster: n/a</p> |
| Aster Global Findings Round 2 | The methodology developer has specified that the risk map should exclusively be generated by the data service provider (DSP). However, the project proponent is permitted to create and submit FCBMs, along with other data such as information, models, or datasets at the project level, to aid in the production of the risk maps. This item is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | A single consistent risk map is produced for the entire jurisdiction by the 3rd party data service provider. Project proponents are encouraged to submit to the data service provide any information, models, or datasets that may assist them in producing higher quality risk maps (see AUDef Appendix 4). The data service provide is not obligated to adopt any community submission of risk maps. Where the data service provider develops multiple competing risk maps, a standard accuracy metric, as defined in VT0007 the risk mapping tool, will be applied to select the single risk map shared by all projects. |
| Comment # | 136 |
| Question | 2 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Projects that are located in areas where distinct drivers of deforestation are present, (e.g. conversion to rice and coffee which requires different terrain conditions) but only one is occurring inside the project area. The risk map could lead to over or under estimation of the baseline. Social and political context might also change the risk considerably in a very short term (e.g. 1-2 y) invalidating the historical period trend. |
| Verra Response | To be addressed through revisions to the <i>UDef-RP</i> |
| Aster Global Assessment | The assessment team is unable to determine whether or not the developer has taken due account of this comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: Verra acknowledges that a drawback of a jurisdictional risk mapping approach is that certain highly location specific drivers might be overlooked. Verra has made the strategic choice that consistency of approach across the jurisdiction is a priority, and for this process to be led by 3rd party rather than project proponents. Project |

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| | <p>proponents are encouraged to submit data, information, and models to the data service provider that may assist them in producing better risk maps.</p> <p>Explanation of original Verra Response: Verra correctly responds that questions pertaining to the generation of risk maps are out of scope of the AUDef module. However, Verra provides additional context for clarity.</p> <p>Response to additional points raised by Aster: n/a</p> |
| Aster Global Findings Round 2 | The methodology developer recognizes that the jurisdictional risk mapping approach is highly location specific as such drivers might be overlooked and states that the project proponent is encouraged to create and submit FCBMs, along with other data such as information, models, or datasets at the project level, to aid in the production of the risk maps. However, the assessment team acknowledges this comment relates to UDef-RP which falls beyond the scope of the assessment. This item is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Verra acknowledges that a drawback of a jurisdictional risk mapping approach is that certain highly location specific drivers might be overlooked. Verra has made the strategic choice that consistency of approach across the jurisdiction is a priority, and for this process to be led by 3rd party rather than project proponents. Project proponents are encouraged to submit data, information, and models to the data service provider that may assist them in producing better risk maps (see AUDef Appendix 4). |
| Comment # | 137 |
| Question | 3 |
| Section | 6 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | It is not just a matter of accuracy, but wall-to-wall mapping provides important information to assess contributions and attributions to different parcels/ stakeholder and support benefit-sharing, for example. Sampling does not provide enough information to effectively design the mitigation actions on the ground, and therefore be more targeted in achieving the climate impacts (i.e. carbon credits). It creates a disconnect between the desktop assessment for the sole purpose of estimating AD and informed decision about deforestation mitigation. In addition, PP might opt to develop wall-to-wall mapping for the reasons above, however considering that PP will pay Verra for the AD it will not be an efficient way to optimize resources. Lastly, considering that at least 3 Forest Cover Benchmarks will be developed for the historical period in order to create the Risk Maps, adding deforestation or forest cover change would lead to a full wall-to-wall map. |
| Verra Response | 1) The datasets produced in Appendix 1 are solely used for the generation and allocation of baseline activity data. Projects are encouraged to generate whatever additional spatial data they may benefit from to guide the implementation of their |

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| <p>Round 1 Response from Methodology Developer</p> | <p>Revised Verra comment addressing original public comment: Activity data is not defined in the methodology and follows IPCC definitions. Most references to degradation have been removed. Degradation is monitored under the project monitoring scenario, but there is no degradation baseline and avoided degradation does not on its own generate any emission reductions.</p> <p>Explanation of original Verra Response: Since drafting, any definition of activity data has been removed, as AD is defined by the IPCC</p> <p>Response to additional points raised by Aster: The term magnitude is included in the IPCC definition of activity data.</p> |
| <p>Aster Global Findings Round 2</p> | <p>The assessment team notes that activity data is defined in the methodology , though indicated otherwise in the methodology developer's response.</p> |
| <p>Round 2 NCR/CL/OFI2</p> | <p>CL: Please clarify in line with the findings.</p> |
| <p>Round 2 Response from Methodology Developer</p> | <p>Revised Verra comment addressing original public comment: It was clarified that module MD00XX only applies to avoided deforestation. Most references to degradation have been removed. Degradation is monitored under the project monitoring scenario, but there is no degradation baseline and avoided degradation does not on its own generate any emission reductions.</p> <p>Response to additional points raised by Aster: See response to Comment #60</p> |
| <p>Aster Global Findings Round 3</p> | <p>The Assessment Team understands that within the AUD Module--degradation is monitored under the project monitoring scenario but is not included in the baseline.</p> <p>However, the Assessment Team would like clarification. The Methodology implies a degradation baseline will be used for a future unplanned degradation module (e.g. Table 2 in the Methodology). As the Methodology is planned for covering both deforestation and degradation modules in the future, can the Methodology Developer please clarify their prior revised comment addressing the public comment?</p> |
| <p>Round 3 NCR/CL/OFI</p> | <p>CL: Please clarify in line with finding.</p> |
| <p>Round 3 Response from Methodology Developer</p> | <p>Revised Verra comment addressing original public comment: It was clarified that module MD00XX only applies to avoided deforestation. Most references to degradation have been removed. Degradation is monitored under the project monitoring scenario, but there is no degradation baseline and avoided degradation does not on its own generate any emission reductions. Degradation is currently included in <i>AUDef</i> to be conservative; if and when an Avoiding Unplanned Degradation module is developed we will revise <i>AUDef</i> to exclude degradation.</p> |
| <p>Aster Global Findings Round 4</p> | <p>The Methodology Developer has added extra context; the Assessment Team finds this context adequately addresses and takes into consideration the original comment. Closed.</p> |
| <p>Status</p> | <p>closed R4</p> |
| <p>Response Updated Since Finding Closed?</p> | <p>no</p> |
| <p>Revised Verra</p> | <p>It was clarified that module MD00XX only applies to avoided deforestation. Most references to degradation have been removed. Degradation is monitored under the project monitoring scenario, but there is no degradation baseline and avoided</p> |

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| Response October 2023 | degradation does not on its own generate any emission reductions. Degradation is currently included in <i>AUDef</i> to be conservative; if and when an Avoiding Unplanned Degradation module is developed we will revise <i>AUDef</i> to exclude degradation. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 139 |
| Question | General |
| Section | 3 |
| Page (if relevant) | 5 |
| Line (if relevant) | LCT Definition |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Forest conversion leads to different emissions factors depending the post-deforestation land use, therefore different climate impacts (i.e. carbon credits). |
| Proposed Change(s) | LCT should include different land uses classes. |
| Verra Response | Project proponents establish forest strata and emission factors in Section 5.3.1. |
| Aster Global Assessment | The assessment team notes that emissions factors are assigned to strata and differentiated post-deforestation. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Project proponents establish forest strata and emission factors in <i>AUDef</i> Section 5.3.42. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 140 |
| Question | General |
| Section | 5.1 |
| Page (if relevant) | 7 |
| Line (if relevant) | 4-5 |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including | Clarify if AD will be automatically updated or only upon request of a Project Developer. |

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| general questions & comments | |
| Verra Response | Verra will update jurisdictional data at the end of the baseline validity period (currently six years). Project proponents must submit an <i>AD Allocation Request Form</i> to be allocated new data for their project areas. |
| Aster Global Assessment | Verra has states jurisdiction data will be updated at the start of each baseline validity period, and supplied to the project proponent by Verra upon submission of AD allocation request. The assessment team finds this in line with the Module. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Verra will update jurisdictional data at the end of the baseline validity period (currently six years). Project proponents must submit an AD Allocation Request Form to be allocated new data for their project areas. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 141 |
| Question | General |
| Section | 5.2 |
| Page (if relevant) | 8 |
| Line (if relevant) | Sentence above table 1 |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Need further clarification of how Planned Deforestation will be delineated considering the disparate use of land registries and environmental agencies process to authorize and document the planned forest conversion. |
| Verra Response | see #88 |
| Aster Global Assessment | #88 refers to the definition of the historical reference period. The assessment team is unsure how that is germane to this comment. |
| Aster Global Initial Findings | CL: Please directly address original comment. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: 1) Verra acknowledges that there are many examples of deforestation that straddle the definition between planned and unplanned deforestation. In the current version of the module, there is no requirement that planned deforestation be exhaustively differentiated from unplanned. Rather, what exists is a requirement that where deforestation is observed in the sample dataset, that additional record is made if that area unambiguously meets a definition of planned deforestation. Verra supports 3rd party data developers in the use of ancillary datasets such as government records in making this determination. Interested parties are also encouraged to provide such information to data developers. With this guidance, areas where the identity as |

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| | <p>planned vs unplanned cannot be determined, the plot is recorded simply as deforestation. See a1.4.1 Step 1 Data Collection, condition b) 2) Guidance on planned deforestation is now provided in section A1.4 Step 1: Jurisdictional Sampling Frame and Areas of Identified Exclusion; and Data Collection 3) Data service providers are required to develop standard operating procedures for differentiating unambiguous examples of planned deforestation, that are calibrated to the specific jurisdiction.</p> <p>Explanation of original Verra Response: Original verra comment incorrectly referred to another response. It should be disregarded.</p> <p>Response to additional points raised by Aster: n/a</p> |
| Aster Global Findings Round 2 | Thank you for the clarification. The assessment team reviewed the updated response to the public comment and updated module. The assessment team is reasonably assured Verra has provided sufficient clarification to the public comment. This finding is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>1) Verra acknowledges that there are many examples of deforestation that straddle the definition between planned and unplanned deforestation. In the current version of the module, there is no requirement that planned deforestation be exhaustively differentiated from unplanned. Rather, what exists is a requirement that where deforestation is observed in the sample dataset, that additional record is made if that area unambiguously meets a definition of planned deforestation. Verra supports 3rd party data developers in the use of ancillary datasets such as government records in making this determination. Interested parties are also encouraged to provide such information to data developers. With this guidance, areas where the identity as planned vs unplanned cannot be determined, the plot is recorded simply as deforestation. See AUDef A1.4.1 Step 1 Data Collection, condition(b) 2) Guidance on planned deforestation is now provided in section A1.4 Step 1: Jurisdictional Sampling Frame and Areas of Identified Exclusion; and Data Collection 3) Data service providers are required to develop standard operating procedures for differentiating unambiguous examples of planned deforestation, that are calibrated to the specific jurisdiction.</p> |
| Comment # | 142 |
| Question | General |
| Section | 5.3 |
| Page (if relevant) | 9 |
| Line (if relevant) | 4-6 |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | On start date - It might be more interesting to use the month of the image that covers the majority of the area of interest (or the average of images that cover 70% ?? of the area). |

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| Verra Response | It is not clear to Verra what would be the advantages or disadvantages of the proposed approach versus the existing definition. Existing definition is retained for this version. |
| Aster Global Assessment | The assessment team found that revisions have made from the publicly posted version and the version currently under assessment. In the prior version, a separate subsection discussed the state and end date of the BVP with specificity whereas it is less explicitly defined in the current version. |
| Aster Global Initial Findings | CL: Please clarify start and end dates of the BVP |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Guidance for eligibility of imagery is clearly stated in A1.4.1 Step 1 Data Sources. Verra has made the choice that it is most appropriate to record dates based only on imagery observed within sample plots, because the location of those plots can bias the determination of average imagery date. Areas of high resolution imagery that are not sampled do not produce any observations of deforestation, so it is inappropriate to use information from those areas to calibrate the start and end dates of the HRP for purposes of generating the historical activity data estimate.</p> <p>Explanation of original Verra Response: Additional clarity provided for Verra's justification of how imagery dates are recorded through the sample plot analysis in appendix 1.</p> <p>Response to additional points raised by Aster: n/a</p> |
| Aster Global Findings Round 2 | The original public comment suggests using the month of the image that covers the majority of the area of interest or the average of images covering a certain percentage of the area. Verra's revised response explains why the choice was made to record dates based only on imagery observed within sample plots and why using information from other areas with high-resolution imagery might not be appropriate for calibrating start and end dates. The assessment team determined the justification provided is appropriate. This item is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Guidance for eligibility of imagery is clearly stated in AUDef A1.4.1 Step 1 Data Sources. Verra has made the choice that it is most appropriate to record dates based only on imagery observed within sample plots, because the location of those plots can bias the determination of average imagery date. Areas of high resolution imagery that are not sampled do not produce any observations of deforestation, so it is inappropriate to use information from those areas to calibrate the start and end dates of the HRP for purposes of generating the historical activity data estimate. |
| Comment # | 143 |
| Question | General |
| Section | 5.4 |
| Page (if relevant) | 9 |
| Line (if relevant) | Bullet 3 |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |

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| Response(s) - including general questions & comments | Geodetic coordinates are points, while the boundary is a polygon. |
| Proposed Change(s) | Further clarification is needed to identify which point(s) will be included in the report (e.g. centroid, upper/lower corners...). |
| Verra Response | Clarification to the required format of geographic data on boundary definitions (Appendix 1 A1.2.1(2)). |
| Aster Global Assessment | The assessment team has confirmed appropriate revisions have been made. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Clarification to the required format of geographic data on boundary definitions (AUDef Appendix 1 A1.2.1(2)). |
| Comment # | 144 |
| Question | General |
| Section | 5.5 |
| Page (if relevant) | 11 |
| Line (if relevant) | First blue block |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Sampling does not provide enough information to effectively design the mitigation actions on the ground and therefore must be more targeted to achieve climate impacts (i.e. carbon credits). It creates a disconnect between the desktop assessment for the sole purpose of estimating AD and informed decision-making about deforestation mitigation. |
| Proposed Change(s) | Wall-to-wall mapping provides important information to assess the contribution and attribution to different parcels/ stakeholder and support the benefit sharing, for example. |
| Verra Response | Wall to wall, or any other spatial data type may be used in following ways described throughout the module: 1) To develop a stratification approach to image sampling 2) to develop a project-specific forest cover benchmark map 3) to supplement and aid analysts in visual interpretation of high resolution imagery. Project Proponents may always generate land cover maps to any standard desired to support their own implementation of emission reduction activities. |
| Aster Global Assessment | The assessment team deems this response to be sufficient. Verra has clarified that projects may make FCBMp and submit these; if deemed more accurate (as defined by A1.4.3.) these may be used. The assessment team finds this statement is in agreement with supplemental text found in Appendices of the module. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |

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| Revised Verra Response October 2023 | Wall to wall, or any other spatial data type may be used in following ways described throughout the module: 1) To develop a stratification approach to image sampling 2) to develop a project-specific forest cover benchmark map 3) to supplement and aid analysts in visual interpretation of high resolution imagery. Project Proponents may always generate land cover maps to any standard desired to support their own implementation of emission reduction activities. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 145 |
| Question | General |
| Section | N/A |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | N/A |
| Proposed Change(s) | Spatial definition of jurisdiction should be based on government plans for jurisdictional programs, where applicable. |
| Verra Response | Verra will define all jurisdictions at the highest reasonable level per current Appendix 1 A1.2.1 |
| Aster Global Assessment | <p>A1.2.1 states "The jurisdictional boundary shall be defined using one of the following cases:</p> <ul style="list-style-type: none"> • The national boundaries may always be used as the jurisdiction. • Where there is a clear expression of government intent to use alternative boundaries in developing jurisdictional REDD programs (e.g., those included in a submission of a FREL to the UNFCCC or a submission to the FCPF's Carbon Fund, the BioCF ISFL or to ART/TREES), the boundaries of a government's jurisdictional REDD+ programme may be used. Only in this case may boundaries be defined using biomes, water catchment areas.A1." <p>The assessment team assesses this as congruent with the response and addresses the original comment.</p> |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Verra will define all jurisdictions at the highest reasonable level per current AUDef Appendix 1 A1.2.1 |
| Comment # | 146 |
| Question | General |
| Section | N/A |
| Page (if relevant) | N/A |

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| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | N/A |
| Proposed Change(s) | Jx baselines should be expanded to include ARR and degradation activities. |
| Verra Response | Verra plans to include modules for planned deforestation and unplanned degradation by the end of 2024. The new Verra ARR meth should be used with this meth to cover ARR activities. |
| Aster Global Assessment | The assessment team agrees this is outside the scope of the module |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Verra plans to include modules for planned deforestation and unplanned degradation by the end of 2024. The new Verra ARR meth should be used with this meth to cover ARR activities. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 147 |
| Question | General |
| Section | N/A |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Need clearer guidelines on what Verra considers acceptable data for 3rd party experts to use for AD generation and approaches to developing the risk map. |
| Proposed Change(s) | N/A |
| Verra Response | See Appendices 1 and 4 and the RFP for AD |
| Aster Global Assessment | Appendices in the module contain data quality standards (e.g. resolution). This is congruent with the response from Verra. |
| Status | closed R1 |

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| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | See AUDef Appendices 1 and 4 and the RFP for AD |
| Comment # | 148 |
| Question | General |
| Section | N/A |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | The baseline reassessment procedure and its long-term implications for projects is not clear and it needs substantial work. It seems that the current baseline reassessment approach would significantly penalize successful projects who have protected forest. In many project cases (in Africa) deforestation agents have not disappeared, but rather have been incentives to temporarily protect forest due to the benefits from carbon credits. If payments disappear, then deforestation will commence again. This likely creates boom and bust cycles for projects and will ruin permanence claims and destroy trust with local community where many projects are working. |
| Proposed Change(s) | Jurisdictional baseline should exclude surrounding VCS projects |
| Verra Response | While we see the concern about including VCS projects in the jurisdictional baseline, we have chosen to include them |
| Aster Global Assessment | The assessment team determined that the original comment is incompletely addressed. Please address the concern that a shorter BVP may result in successful deforestation projects leading to lower baseline deforestation, thereby reducing the financial incentive for ongoing deforestation projects. |
| Aster Global Initial Findings | CL: Please address in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Verra has extensively considered this question and decided to include projects in the jurisdictional sampling frame. At the stage of activity data development, including projects in the sampling frame actually results in higher allocation to projects, because more deforestation will be calculated within the jurisdiction. The issue raised around self-limiting baselines becomes more salient at the stage of the risk map development. Verra acknowledges that projects that successfully reduce deforestation may under some risk models generate lower baselines. Verra is continuing to evaluate the risk mapping tool to determine the appropriate balance of conservativeness but also not producing perverse incentives for projects.</p> <p>Explanation of original Verra Response: Verra affirms its response, but provides additional justification for its decision to do so.</p> <p>Response to additional points raised by Aster: The original comment does not cite a concern about shortened BVP. The length of the</p> |

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| | baseline validity period is defined in the VCS standard v4.2 and later, and is out of scope of this module. |
| Aster Global Findings Round 2 | While not opting to take the commenter's suggestion, the methodology developer has provided additional rationale regarding the decision to include surrounding VCS Projects. The assessment team determined this comment is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Verra has extensively considered this question and decided to include projects in the jurisdictional sampling frame. At the stage of activity data development, including projects in the sampling frame actually results in higher allocation to projects, because more deforestation will be calculated within the jurisdiction. The issue raised around self-limiting baselines becomes more salient at the stage of the risk map development. Verra acknowledges that projects that successfully reduce deforestation may under some risk models generate lower baselines. Verra is confident that the approach in VT0007 has an continuing to evaluate the risk mapping tool to determine the appropriate balance of conservativeness but also not producing perverse incentives for projects. However, this is something we will monitor and work to continually improve. |
| Comment # | 149 |
| Question | General |
| Section | N/A |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Given these baselines choices will affect multiple projects, there must be some democratic way for selection of the FREL and activity data allocation. There are a number of decisions that are not just of the technical realm, i.e. which risk mapping model approach to use, which becomes a quasi-political decision that political institutions need to take. |
| Proposed Change(s) | FRELS should require national government approval / endorsement, along with VERRA's global requirements. |
| Verra Response | AD used to create jurisdictional baselines may come from government FRELS if it meets Verra requirements. |
| Aster Global Assessment | Table 17 in Appendix 4 states activity data may be "Sample plot observations representative of the jurisdiction, including those developed for national FREL and by other groups that meet the standards described in Appendix 1 for sample plot observations, covering time period and resolution of source imagery.". The assessment team finds this is congruent with the Verra response and partially addresses the original comment. However, the original comment hinted at a "democratic" way to allocate AD, implying AD allocation would be a product of entities other than Verra/DSPs. |
| Aster Global Initial Findings | CL: Please address this portion of the finding. |
| Round 1 Response from | Revised Verra comment addressing original public comment: 1) Verra has provided an avenue for all stakeholders to submit information, models and data to the 3rd party data service provider, to assist in producing better risk maps |

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| Methodology Developer | <p>2) Verra has made the strategic choice that for the integrity of the carbon claims, the risk map must be seen as a technical product only, and not as a political agreement. Governments wishing to distribute monetary carbon benefits to stakeholders in a way that does not spatially align with the locations credits are generated (per the risk map) must do so through carbon legislation and/or benefit sharing plans.</p> <p>Explanation of original Verra Response: Verra affirms its original response.</p> <p>Response to additional points raised by Aster: Verra does not propose a democratic approach to data development. The exact roles and allowed participation of all stakeholders regarding data generation, and the treatment of official government data, is outlined in appendix 4.</p> |
| Aster Global Findings Round 2 | The methodology developer has clarified that a democratic approach will not be used for data development, and has cited appropriate justification for this decision's rationale. This item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>1) Verra has provided an avenue for all stakeholders to submit information, models and data to the 3rd party data service provider, to assist in producing better risk maps</p> <p>2) Verra has made the strategic choice that for the integrity of the carbon claims, the risk map must be seen as a technical product only, and not as a political agreement. Governments wishing to distribute monetary carbon benefits to stakeholders in a way that does not spatially align with the locations credits are generated (per the risk map) must do so through carbon legislation and/or benefit sharing plans.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 150 |
| Question | General |
| Section | N/A |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Risk can be allocated using many different risk modelling approaches. |
| Proposed Change(s) | Need to provide guidance on how to rationalize different risk maps from different risk mapping approaches. There seems to be a provision for this, but no details of how this would actually happen. To be fair, it's not clear if addressing this issue could ever be possible. |
| Verra Response | This will be addressed in the new version of the Unplanned Deforestation Risk Modeling and Mapping Procedure (UDef-RP) |

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| Aster Global Assessment | The assessment team is unable to determine whether or not the developer has taken due account of this comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: This will be addressed in the new version of the Unplanned Deforestation Risk Modeling and Mapping Procedure (UDef-RP). The UDef-RP contains provisions for alternative risk mapping approaches to be utilized. There are no restrictions on the kinds of modeling approaches permitted. Alternative models must demonstrate a higher predictive ability than the default 'benchmark' model provided within the risk mapping tool. A statistical metric is utilized as the metric to identify the best performing risk map among alternatives.</p> <p>While highly relevant to the implementation of the methodology, the UDef-RP is out of the scope of this consultation.</p> <p>Explanation of original Verra response: Didn't explain that the UDef-RP was out of scope.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has indicated that this public comment is out of the scope of the methodology assessment and should not be reviewed. This item is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | This will be addressed in the new version of the Unplanned Deforestation Risk Modelling and Mapping and Allocation Tool Procedure (UDef-RATP). The UDef-RATP contains provisions for alternative risk mapping approaches to be utilized. There are no restrictions on the kinds of modeling approaches permitted. Alternative models must demonstrate a higher predictive ability than the default 'benchmark' model provided within the risk mapping tool. A statistical metric is utilized as the metric to identify the best performing risk map among alternatives. |
| Comment # | 151 |
| Question | General |
| Section | N/A |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general | The lack of longer-term assurances for projects about credit generation is a significant problem. Preventing deforestation in community takes a lot of trust building and time to change behaviors. These short time periods for baseline assessment will likely |

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| questions & comments | result in quick fixes/ short term investment programmes, i.e. temporary enforcement rather than sustainable activities to transitions to deforest free livelihoods and local economies. This further incentivizes low quality projects. |
| Proposed Change(s) | Verra should consider the cost/benefits of a shorter vs longer historical reference period |
| Verra Response | <p>The historical reference period to 10 years per the <i>VCS Standard</i> requirement.</p> <p>The following text has been added in Section 8.1.1 of M0184 relating to projects' adoption of the jurisdictional baseline: "Where a project validates or transitions to VM0184 after the initial year of a jurisdictional BVP, the project proponent(s) may choose to request allocation of data from the subsequent jurisdictional BVP when that BVP begins. Alternatively, the initial project BVP may be the duration set out in the VCS Standard – regardless of whether it spans two jurisdictional BVPs. After the initial project BVP, the project must adopt an allocation from the respective jurisdictional baseline. Subsequent project BVPs must be the same duration as the jurisdictional BVP."</p> |
| Aster Global Assessment | <p>1)The response claims the historical reference period is per the VCS Standard. The assessment team is unable to directly identify where in the Standard, this is located. Is Module Developer referring to, "The project area shall meet an internationally accepted definition of forest, such as those based on UNFCCC host country thresholds or FAO definitions, and shall qualify as forest for a minimum of 10 years before the project start date."?</p> <p>2) Clarification is sought regarding the application of the BVP.</p> <p>2a) The response is not verbatim, and thus has slightly different application than is in the revision: "The jurisdictional baseline for avoiding unplanned deforestation is valid for six years. Where a project validates or transitions to VM0184 after the initial year of the jurisdictional BVP, the first project BVP will be six years after the project adopts VM0184. After those six years, the project must adopt the respective jurisdictional BVP. Subsequent project BVPs must be equal to the jurisdictional BVP. ".</p> <p>2b) If a project starts (Py=0) at the fifth year of the first BVP, than the assessment team assumes the project may continue to use the first BVP until Py=6. At which point the project may then use the second BVP for only two years before required to switch to the third BVP. The Assessment team is curious why the decision was made to allow a project to use the first BVP for six years, and then must switch to sync with the BVP schedule.</p> <p>2c) Therefore, this does require a 6 yr., then sub-6 yr. time periods for baseline reassessments followed by six yr. periods. The assessment team found the response did not directly address the original commenter's concern over short time periods.</p> |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The requirements for Avoiding Unplanned Deforestation projects' historical reference period (HRP) and baseline reassessment are in sections 3.4.15(2) of the VCS Methodology Requirements v4.3 and 3.2.7 of the VCS Standard v4.4, respectively (HRP is defined in the methodology by referring to the Methodology Requirements). These are considered at the VCS Program level and are out of the scope of this methodology consultation.</p> <p>Out of practical considerations, Verra has made an allowance for projects during their first baseline validity period to carry over their AD allocation into a subsequent BVP under certain circumstances, as described in Section 8.1.1 of M0184 v0.4. Project proponents may elect to update to the second jurisdictional BVP up to two years after that BVP begins.</p> |

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| | <p>Explanation of original Verra response: The original 'proposed change' references historical reference period, but it is clear from the original comment that the question is really about the baseline validity period, which relates directly to long term assurances for projects. Verra's original response was in relation the HRP, but this was a misunderstanding of the original comment. Regardless, both of these are VCS Program-level issues that would not change as a result of this methodology consultation.</p> <p>The text of the methodology has changed since the original response was written; the response now points to the section and provides a high-level summary of the options available to projects.</p> <p>Response to additional points raised by Aster: 2b) To allow investment certainty, project proponents have advocated for the initial project BVP to be as long as possible under the new methodology, regardless of the jurisdictional BVP. We decided to allow up to two years in the subsequent BVP to give some leeway but not get too far away from the HRP on which the baseline was founded. Project proponents tell us the second project BVP is less consequential.</p> |
| Aster Global Findings Round 2 | The assessment team acknowledges that the HRP is sourced from the VCS Methodology Requirements and that the commenter was likely referring to the BVP. The assessment team acknowledges that the text has since been updated and determined that the revised text and additional clarification provided is sufficient to close the identified finding. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>The requirements for Avoiding Unplanned Deforestation projects' historical reference period (HRP) and baseline reassessment are in sections 3.4.15(2) of the VCS Methodology Requirements, v4.43 and 3.2.7 of the VCS Standard, v4.54, respectively (HRP is defined in the methodology by referring to the Methodology Requirements). These are considered at the VCS Program level and are out of the scope of this methodology consultation.</p> <p>Out of practical considerations, Verra has made an allowance for projects during their first baseline validity period to carry over their AD allocation into a subsequent BVP under certain circumstances, as described in AUDef Section 5.3.1-8.1.1 of VM0048. Project proponents may elect to update to the second jurisdictional BVP up to two years after that BVP begins.</p> |
| Comment # | 152 |
| Question | General |
| Section | 5.5 & 5.5.1 |
| Page (if relevant) | 10 & 11 |
| Line (if relevant) | 4 & 10 |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general | Within the advance of remote sensing technology it is crucial to define what Verra's threshold for high resolution images is (<10m of spatial resolution ?). |

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| questions & comments | |
| Verra Response | While <5 m resolution data is available, it is expensive to access and may be a burden to project proponents. We will update this in the future if the situation changes. |
| Aster Global Assessment | The assessment team understands it may not be feasible for global sub 5 m resolution aerial imagery. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | While <5 m resolution data is available, it is expensive to access and may be a burden to project proponents. We will update this in the future if the situation changes. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 153 |
| Question | General |
| Section | 5.5.1 |
| Page (if relevant) | 11 |
| Line (if relevant) | Step 1 |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Step 1 suggests that images can be collected over a period of 2y (+/- 365 days). It would be interesting to align the dates (i.e. 1y) |
| Verra Response | The images can come from a 2-year wide window as long as the <i>average</i> date of those images is within a 1-year window of the nominal start and end dates of the historical reference period |
| Aster Global Assessment | The assessment team has confirm this is made clear in the current version. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The images can come from a 2-year wide window as long as the average date of those images is within a 1-year window of the nominal start and end dates of the historical reference period |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 154 |
| Question | General |

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| Section | 5.5.1 |
| Page (if relevant) | 12 |
| Line (if relevant) | 25-29 |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Further clarification is needed to describe who is responsible for developing the SOPs and validating the approach. |
| Verra Response | Verra will contract with data service providers to develop this data per the process laid out in current Appendix 1 A1.4.1 |
| Aster Global Assessment | The assessment team is similarly confused. A1.4.3 states Verra will construct FCBMs, guided by SOPs. Additionally, Table 17 in Appendix 4 states SOPs may come from "Submissions from Project Proponents, Governments, and Other Engaged Stakeholders". These appear in conflict with Verra's response implying SOPs are provided by DSPs. |
| Aster Global Initial Findings | CL Please clarify in line with findings. OFI: The passive language in A1.4.1 Step 1 removes the actor "Standard operating procedures (SOPs) must be developed and employed and must include...". There is an opportunity to improve clarity here. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: All activities described in Appendices 1, 2 and 3 are to be carried out by Verra's contracted 3rd party data provider (DSP) (per Appendix i A1.4.1). The description of the need to develop SOPs in these appendices should therefore be understood as a responsibility of the 3rd party DSP. The SOPs will not be open for public comment (for expediency) but Verra will review them.</p> <p>Corrections to original Verra Response: Restated with more detail.</p> <p>Response to additional points raised by Aster: 1) Appendix 4 provides guidance on what kinds of information, including SOPs, that any party, including project proponents, may submit to the 3rd party data service provider for review. This guidance explicitly states in relation to stakeholder submitted SOPs" "Where submissions represent official government data, the DSP should use these data where the data are shown to be of at least comparable fitness for purpose as other available data sources. Except in the case of official government data, DSP is not obligated to use any or all submissions in dataset generation." While appendices 1-3 identify the need for a SOP to accompany the remote sensing analysis described, appendix 4 relates to the ability of stakeholders to submit recommendations to the entity undertaking appendices 1-3. 2) Appendix 4 begins with the statement "Verra is responsible for AD collection, risk map development and AD allocation. It will contract with data service providers (DSPs) to accomplish this. Any stakeholder may provide data products related to AD collection and risk mapping for a given jurisdiction, provided these products meet the requirements set out in Table 18 below." All text in Appendix 4 is therefore understood as related to the optional provision of materials to Verra's contacted data service provider. Reference to SOP in 5.3.2.2 clarified to state "Standard operating</p> |

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| | procedures (SOPs) must be developed by the project..." Reference to SOP in A1.4.1 clarified to state "SOPs must be developed and employed by the data developer..." |
| Aster Global Findings Round 2 | The assessment team reviewed the updated language contained within the module and Verra's updated responses and is reasonably assured that Verra has sufficiently clarified and updated the module to address the commenters concern. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | All activities described in AUDef Appendices 1, 2 and 3 are to be carried out by Verra's contracted 3rd party data provider (DSP) (per Appendix 1 A1.4.1). The description of the need to develop SOPs in these appendices should therefore be understood as a responsibility of the 3rd party DSP. The SOPs will not be open for public comment (for expediency) but Verra will review them. |
| Comment # | 155 |
| Question | General |
| Section | 5.5.1 |
| Page (if relevant) | 12 |
| Line (if relevant) | Sampling framer |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Sampling in the entire jurisdiction - need further clarification (or any consideration) for areas covered by cloud/shade. |
| Verra Response | Appendix 1 Section A1.4.1 clarifies that "Other spatial data may be used to increase the sampling design efficiency or aid interpretation of the images." |
| Aster Global Assessment | The assessment team interprets this as a question related to QA/QC and SOPs. Please clarify |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: It is anticipated that data service providers will experience many challenges with data availability and quality, including cloud cover and shadows. It is the DSPs responsibility to develop and document a workflow that is able to overcome the potential for such issues to bias results. Verra is unable to provide detailed guidance on how to deal with all technical remote sensing challenges in the methodology. The SoP produced by the DSP describes the need to include QA/QC techniques utilized to minimize error</p> <p>Verra is also currently asking its contracted data service providers to track the analyst confidence around each sample plot observation, and where observations were not possible due to data availability. Verra is not yet able to formally describe how the results of this assessment must be used by DSPs, but hopes that the learnings from this exercise will inform future specifications to the methodology.</p> <p>Clarification of Verra's original response: Verra reaffirms the original response, but adds additional detail around what the</p> |

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| | methodology does (and doesn't) attempt to describe regarding remote sensing quality control. |
| Aster Global Findings Round 2 | While the module provides general information, Verra has clarified that detailed procedures will be outlined in the SOPs. As mentioned by Verra, DSPs are responsible for developing SOPs and documenting QA/QC procedures. The assessment team determined the justification provided is appropriate. This item is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>It is anticipated that data service providers will experience many challenges with data availability and quality, including cloud cover and shadows. It is the DSP's responsibility to develop and document a workflow that is able to overcome the potential for such issues to bias results.</p> <p>Verra is unable to provide detailed guidance on how to deal with all technical remote sensing challenges in the methodology. The SoP produced by the DSP describes the need to include QA/QC techniques utilized to minimize error. Verra is also currently asking its contracted data service providers to track the analyst confidence around each sample plot observation, and where observations were not possible due to data availability. Verra is not yet able to formally describe how the results of this assessment must be used by DSPs, but hopes that the learnings from this exercise will inform future specifications to the methodology.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 156 |
| Question | General |
| Section | 5.5.1 |
| Page (if relevant) | 12 |
| Line (if relevant) | Sampling framer |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Natural disturbances that cause deforestation - Please clarify, are the infrequent large scale natural disturbances required or optional (considering sample data requires a range of 365 days only)? |
| Verra Response | Text clarified that these disturbances are delineated if they occur any time within the historical reference period. |
| Aster Global Assessment | Table 15 in the A1.4.3 states disturbances are excluded in the sampling frame but included in the FCBM if they had occurred within the HRP (and counted as stable non-forest) if they have occurred. Further, Table 9 describes a natural disturbance as "Deforestation during the HRP caused by known infrequent, large-scale natural disturbance". However, 5.3.2.3 states "However, in the event of a large-scale natural disturbance that does not result in a transition to non-forest, additional forest strata may be defined". The former context appears to assume all disturbances are agents of deforestation whereas the section in 5.3.2.3 appears to consider the severity and/or extent of |

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| | <p>disturbance. Given that all exclusions must meet a minimum contiguous size of 1000 ha, does this imply that only those disturbances at least 1000 ha need to be excluded?</p> |
| Aster Global Initial Findings | <p>CL: Please clarify in line with finding, with particular attention to defining "large-scale"</p> |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: For project monitoring, delineation of disturbances that result in deforestation is mandatory where minimum size criteria of 100 contiguous hectares are met. Delineation of natural disturbances that do not result in a forest to non-forest transition and assignment to a new forest stratum is optional. See sections 5.3.1.1, 5.3.2.2 step 2, and 5.3.2.3. For development of the jurisdictional activity data and risk maps, detailed description of the types and size of natural disturbances that must be identified are provided in table 11 and A1.4.1 Step 1 Data Collection.</p> <p>Explanation of original Verra Response: Initial response was in error, revised response now reflects current draft of module.</p> <p>Response to additional points raised by Aster: 1) Comment is understood to reference table 17, renumbered from table 15. Table 17 clarifies that natural disturbances are reassigned to be treated as '1 - stable non-forest' for purposes of risk mapping. 2) Comment is understood to reference table 11, renumbered from table 9. Table 11 does not describe "Natural Disturbances". It defines a mapped category class with the title "Map of Identified Exclusion - Natural Disturbances." The specific definition of this map category is provided in the table, and includes reference to "Deforestation." 3) The passage cited in 5.3.2.3 has been changed to "However, in the event of a natural disturbance impacting 100 contiguous hectares or more that does not result in a transition to non-forest, additional forest strata may be defined." The term 'large-scale' is no longer defined in this section. 4) The 1000ha figure is provided in Appendix 1 and applies only to text within such Appendix related to jurisdiction-level data and information. Section 5.3.2.2 Step 1 also provides further clarification with the passage "For project monitoring, an identified exclusion must meet a minimum contiguous size of 100 ha (as opposed to 1000 ha for the jurisdiction)."</p> |
| Aster Global Findings Round 2 | <p>The assessment team notes that the initial response was in error. The assessment team reviewed the additional clarification provided and determined that the confusion pertaining to disturbances, particularly "large-scale" disturbances, has been rectified. This item is addressed.</p> |
| Status | <p>closed R2</p> |
| Response Updated Since Finding Closed? | <p>wording/typo updates</p> |
| Revised Verra Response October 2023 | <p>For project monitoring, delineation of disturbances that result in deforestation is mandatory where minimum size criteria of 100 contiguous hectares are met. Delineation of natural disturbances that do not result in a forest to non-forest transition and assignment to a new forest stratum is optional. See sections 5.3.2.1, 5.3.2.2 step 2, and 5.3.2.3. For development of the jurisdictional activity data and risk maps, detailed description of the types and size of natural disturbances that must be identified are provided in Table 11 and AUDef A1.4.1 Step 1 Data Collection.</p> |
| Comment # | <p>157</p> |

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| Question | General |
| Section | 5.5.1 |
| Page (if relevant) | 14 |
| Line (if relevant) | Planned vs Unplanned Deforestation, 6-9 |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | It will be challenging for a Remote Sensing Provider to know where the private land or government concessions are, but PP, who usually understands the reality on the ground and is engaged with many stakeholders (including government), might be able to access such information more easily. |
| Verra Response | Project proponents are encouraged to submit supplemental information to aid the data service provider (Appendix 4) |
| Aster Global Assessment | Verra has stated project proponents may submit supplemental information. This is congruent with Table 17 in Appendix 4. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Project proponents are encouraged to submit supplemental information to aid the data service provider (AUDef Appendix 4) |
| Comment # | 158 |
| Question | General |
| Section | 5.5.1 |
| Page (if relevant) | 15 |
| Line (if relevant) | Sentence above imagery |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Further clarification is need on how to validate the decision tree in the jurisdictional context and the results/outcomes. |
| Verra Response | The decision tree is included in the SOP for response design that is part of the DSP's deliverables. It does not need to be addressed by a VVB, but by an independent expert |
| Aster Global Assessment | The Module in Appendix 1 requires a decision tree is needed for identifying planned and unplanned deforestation and that this shall be part of the SOP. Appendix 3 requires an independent expert to assess the procedures. The assessment team finds the response addresses the comment and does not contradict the Module. However, A3.3.2 states "The process of developing AD for each jurisdiction must be documented in the description report for the purpose of validation by a Verra-contracted VVB." and the assessment team finds this to be contradictory. |

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| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The decision tree is included in the SOP for response design that is part of the DSP's deliverables. It does not need to be addressed by a VVB, but by an independent expert</p> <p>Explanation of original Verra Response: Verra reaffirms the original response and believes it to correctly address the public comment.</p> <p>Response to additional points raised by Aster: The passage in question in A3.3.2 has been removed from the module. The only remaining reference to a decision tree is provided in footnote 20, and is described as a component of a standard operating procedure document.</p> |
| Aster Global Findings Round 2 | The assessment team confirms that removal of the identified passage is sufficient to close the identified finding. This item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The decision tree is included in the SOP for response design that is part of the DSP's deliverables. It does not need to be addressed by a VVB, but by an independent expert. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 159 |
| Question | General |
| Section | 5.5.3 |
| Page (if relevant) | 25 |
| Line (if relevant) | 14-16 |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Similar comment as for the AD - Further clarification is needed to describe who is responsible for developing the SOPs, and validating the approach. |
| Verra Response | SOPs will be developed by DSPs and assessed by independent experts |
| Aster Global Assessment | The assessment team is similarly confused. A1.4.3 states Verra will construct FCBMs, guided by SOPs. Additionally, Table 17 in Appendix 4 states SOPs may come from "Submissions from Project Proponents, Governments, and Other Engaged Stakeholders". These appear in conflict with Verra's response implying SOPs are provided by DSPs. |

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| Aster Global Initial Findings | CL Please clarify in line with findings. OFI: The passive language in A1.4.1 Step 1 removes the actor "Standard operating procedures (SOPs) must be developed and employed and must include...". There is an opportunity to improve clarity here. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: SOPs will be developed by DSPs and assessed by independent experts</p> <p>Explanation of original Verra Response: The original response fully and correctly responds to the public comment.</p> <p>Response to additional points raised by Aster: Appendix 4 begins with the statement "Verra is responsible for AD collection, risk map development and AD allocation. It will contract with data service providers (DSPs) to accomplish this. Any stakeholder may provide data products related to AD collection and risk mapping for a given jurisdiction, provided these products meet the requirements set out in Table 18 below." All text in Appendix 4 is therefore understood as related to the optional provision of materials to Verra's contacted data service provider. Reference to SOP in 5.3.2.2 clarified to state "Standard operating procedures (SOPs) must be developed by the project..." Reference to SOP in A1.4.1 clarified to state "SOPs must be developed and employed by the data developer..."</p> |
| Aster Global Findings Round 2 | The assessment team confirms that removal of the identified passage is sufficient to close the identified finding. This item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | SOPs will be developed by DSPs and assessed by independent experts |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 160 |
| Question | 2 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Value for Nature Ltd. |
| Reviewer Country | UK |
| Response(s) - including general questions & comments | It appears that the JNR Risk Mapping Tool uses distance to historical deforestation as its only criterion to determine deforestation risk, to keep things simple. Proximity to historical deforestation is no doubt an important criterion to determine deforestation risk, but it cannot be the only one. It should only be the single criterion where there is homogeneity in terms of access to forest land by deforestation actors (determined by land ownership type and land management) and interest of accessing forest lands by deforestation actors (determined by forest type, terrain, climate). In other words, there may be boundaries across which access and interest is significantly different. This |

may lead to over-estimations of deforestation risk, as well as under-estimations. For example, in Madre de Dios, Peru, there are areas of high deforestation that are private lands along main roads and rivers, while further inland there are logging concessions that logging companies lease from the state. While some inactive concessions closest to the road have been steadily encroached upon by squatters, actively logged concessions have not. An active presence in the forest seems to be an effective deterrent. Commercial logging groups have the clout and the funds to be a formidable opponent to small-scale opportunistic agents of deforestation. Assuming that deforestation up to the concession boundary would continue unabated into the concession would result in an over-estimation of deforestation. Another example: indigenous reserves in Brazil have been able to keep out the surrounding deforestation on privately owned lands to varying degrees, depending on the strength of their leadership, legal and technical support, and financial resources. Deforestation pressures on indigenous reserves have increased as state support has waned. There are likely to be 'tipping points' beyond which the indigenous tribe is not able anymore to stop the influx of deforestation actors, resulting in a much higher deforestation risk than just that of proximity to historical deforestation. Since the jurisdictional risk mapping is carried out by a specialized consultant only every 6 years, it does not have to be overly simplistic. It would not be too difficult to add additional criteria into the JNR Risk Mapping Tool, based on risk of deforestation agent's access to forests (e.g. high, medium, low) and willingness to access (e.g. high, low). The Tool could prescribe processes to determine these classes, for example through overlays with cadastral maps, and interactive sessions with the jurisdictional forest authority to determine areas under different management type and management effectiveness, as well as areas with low potential for post-deforestation land uses (e.g. too steep, too wet). The identification of forests at risk would still be driven by proximity to historical deforestation, but would be different in areas with different access and willingness profiles. The proposed risk mapping only uses historical deforestation in the previous 6 years. Successful AUDD projects will therefore, in a sense, shoot themselves in the foot in subsequent baseline periods. Especially frontier deforestation may result in a significantly lower allocation of activity data if most lands outside the project boundary were already deforested before the second baseline period. This might not adequately reflect the risk of deforestation that still exists within the project boundary. This risk would depend on the vulnerability of the project proponents and stakeholders. Again, an indigenous tribe may have been able to keep opportunistic deforestation agents out during the first baseline period, but its efforts could collapse if carbon finance falters in the second period due to reduced deforestation in proximity to their project boundary and a failure to recognize their vulnerability. Other vulnerable project proponents are poor communities with few resources, influence or capacity to confront deforestation agents. While the project should by design seek to change this situation this may take time. The status of vulnerability of the project proponent could be (re)determined at validation and verifications. A tool could be developed for this assessment.

Not only could a high vulnerability status lead to a default allocation of 'high' on the risk of deforestation agent's access to forests, it could also trigger the assumption that in these highly vulnerable projects those areas allocated as activity data in the previous baseline map become observed areas of deforestation in the subsequent baseline map. These then determine where in the project area further deforestation would have taken place based on proximity, which are then allocated to the project. These allocations are then assumed to be the observed areas of deforestation in the next baseline map, and so on. This approach ensures continued support for those forests and people that are literally on the front line and that face the highest risks of deforestation.

Verra Response

To be addressed through revisions to the *UDef-RP*

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| Aster Global Assessment | The assessment team is unable to determine whether or not the developer has taken due account of this comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra response to original comment: Comments have been noted and reveal a misunderstanding of how the deforestation risk modeling and mapping is to be implemented in the consolidated methodology. The very simple model based on distance to forest edge is not the one that will (necessarily) be adopted as the jurisdictional deforestation risk model and map, it is meant to serve only as a benchmark, initial or reference model. Project proponents and other relevant stakeholders are prompted to recommend other variables that are demonstrably related to deforestation risk in the jurisdiction, and provide the corresponding data. Those additional data will then be used to construct alternative, information richer, more complex models that may be better than the benchmark model at predicting deforestation risk across the entire jurisdiction. The predictive ability of the benchmark and alternative models will be compared in purely statistical terms and the one model that shows the best predictive ability will be the one adopted as the jurisdictional model (and map) of deforestation risk. This has been further described and clarified in the latest version of the <i>AUDef</i> module.</p> <p>Explanation of original response: Referred to a document that is out of scope</p> |
| Aster Global Findings Round 2 | Verra has indicated that this public comment is out of the scope of the methodology assessment and should not be reviewed. This item is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Comments have been noted and they reveal a misunderstanding of how the deforestation risk modeling and mapping is to be implemented in the consolidated methodology (in VT0007). The very simple model based on distance to forest edge is not the one that will (necessarily) be adopted as the jurisdictional deforestation risk model and map, it is meant to serve only as a benchmark, initial or reference model. Project proponents and other relevant stakeholders are prompted to recommend other variables that are demonstrably related to deforestation risk in the jurisdiction, and provide the corresponding data. Those additional data will then be used to construct alternative, information richer, more complex models that may be better than the benchmark model at predicting deforestation risk across the entire jurisdiction. The predictive ability of the benchmark and alternative models will be compared in purely statistical terms and the one model that shows the best predictive ability will be the one adopted as the jurisdictional model (and map) of deforestation risk. This has been further described and clarified in the latest version of the <i>AUDef</i> module. |
| Comment # | 161 |
| Question | 2 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |

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| Reviewer Organization | Volkswagen-Climate Partner |
| Reviewer Country | Germany |
| Response(s) - including general questions & comments | <p>The dependence of risk on distance from forest edge isn't as applicable to most protected areas as it is to mosaic types of deforestation in wildernesses or other non-protected areas. Additional factors such as law enforcement capacity and perceived ecosystem value are often the strongest determinants of deforestation risk in protected areas. Any area that can possibly be converted is, therefore, at some level of risk.</p> <p>The current J-ADB-UD module will result in rather few medium to high-risk classes, and a large number of insignificant (zero) risk classes to the core regions in protect areas, which basically lowers the credit generation per ha of such project areas, and could end up discouraging conservation of protected areas through REDD+. This may not reflect realities on the ground.</p> <p>Suggestion: Risk classes should be from minimum to high, not insignificant to high. Develop a standardized baseline allocation for protected areas that use protection parameters, rather than distance alone to create the AD.</p> <p>Rationale: Revenue generation from all convertible areas allows for the protection of the whole protected area as a single unit. Moreover, threat to protected areas is not conversion to agriculture alone (think of biodiversity conservation for the CCB standard).</p> |
| Verra Response | To be addressed through revisions to the <i>UDef-RP</i> |
| Aster Global Assessment | The assessment team is unable to determine whether or not the developer has taken due account of this comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra response to original comment: Comments have been noted and reveal a misunderstanding of how the deforestation risk modeling and mapping is to be implemented in the consolidated methodology. The very simple model based on distance to forest edge is not the one that will (necessarily) be adopted as the jurisdictional deforestation risk model and map, it is meant to serve only as a benchmark, initial or reference model. Project proponents and other relevant stakeholders are prompted to recommend other variables that are demonstrably related to deforestation risk in the jurisdiction, and provide the corresponding data. Those additional data will then be used to construct alternative, information richer, more complex models that may be better than the benchmark model at predicting deforestation risk across the entire jurisdiction. The predictive ability of the benchmark and alternative models will be compared in purely statistical terms and the one model that shows the best predictive ability will be the one adopted as the jurisdictional model (and map) of deforestation risk. This has been further described and clarified in the latest version of the <i>AUDef</i> module.</p> <p>Explanation of original response: Referred to a document that is out of scope</p> |
| Aster Global Findings Round 2 | Verra has indicated that this public comment is out of the scope of the methodology assessment and should not be reviewed. This item is closed. |
| Status | closed R2 |

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| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Comments have been noted and they reveal a misunderstanding of how the deforestation risk modeling and mapping is to be implemented in the consolidated methodology (in VT0007). The very simple model based on distance to forest edge is not the one that will (necessarily) be adopted as the jurisdictional deforestation risk model and map, it is meant to serve only as a benchmark, initial or reference model. Project proponents and other relevant stakeholders are prompted to recommend other variables that are demonstrably related to deforestation risk in the jurisdiction, and provide the corresponding data. Those additional data will then be used to construct alternative, information richer, more complex models that may be better than the benchmark model at predicting deforestation risk across the entire jurisdiction. The predictive ability of the benchmark and alternative models will be compared in purely statistical terms and the one model that shows the best predictive ability will be the one adopted as the jurisdictional model (and map) of deforestation risk. This has been further described and clarified in the latest version of the AUDef module. |
| Comment # | 162 |
| Question | 2 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Wildlife Conservation Society (WCS) |
| Reviewer Country | Rwanda |
| Response(s) - including general questions & comments | As discussed previously, we strongly encourage that alternative approaches be allowed. It is recommended that guidance be developed by land use change modeling experts which lays out the recommended components to be included in any risk modeling, and procedures for comparing risk maps and choosing the appropriate maps. |
| Verra Response | To be addressed through revisions to the <i>UDef-RP</i> |
| Aster Global Assessment | The assessment team is unable to determine whether or not the developer has taken due account of this comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The revised UDef-RP will have all of the elements requested in the original comment: -alternative approaches are allowed -recommended components to be included in a benchmark risk modeling approach -procedures for comparing risk maps and choosing the appropriate maps, currently understood to be the TOC curve</p> <p>Explanation of original Verra Response: Initial Verra response correctly highlights that questions pertaining to the risk map generation are not covered by this module, and are therefore out of scope. Nevertheless, additional context is provided.</p> |

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| | Response to additional points raised by Aster: N/A |
| Aster Global Findings Round 2 | Verra has indicated that this public comment is out of the scope of the methodology assessment and should not be reviewed. This item is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | VT0007 has The revised UDef RP will have all of the elements requested in the original comment: -alternative approaches are allowed -recommended components to be included in a benchmark risk modeling approach -procedures for comparing risk maps and choosing the appropriate maps, currently understood to be the TOC curve |
| Comment # | 162 |
| Question | 4 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Reviewer Country | Zambia |
| Response(s) - including general questions & comments | Yes, we will definitely submit forest cover benchmark maps for potential project areas. |
| Verra Response | N/A |
| Aster Global Assessment | No response required. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | N/A |
| Comment # | 163 |
| Question | 5 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |

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| Reviewer Country | Zambia |
| Response(s) - including general questions & comments | Yes, for projects already under development or at feasibility assessment stage, we are currently estimating emissions reductions using the existing VM15 methodology. |
| Verra Response | N/A |
| Aster Global Assessment | No response required. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | N/A |
| Comment # | 164 |
| Question | General |
| Section | Module BL-UD, v1.0 |
| Page (if relevant) | 5 |
| Line (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Reviewer Country | Zambia |
| Response(s) - including general questions & comments | 'The entire AUD project boundary must be contained within Jurisdiction(s) with an approved J-ADB-UD Description Report prior to the project start date.' This statement is confusing. Does it mean the project boundary must be contained prior to the start date, or does it mean there must be an approved report prior to the start date. If it is the later, this presents a massive problem for projects under development at present. We would request some clarity on this and also request that the AD be generated for time periods previous to the release of these modules, to include projects already under development. |
| Verra Response | Text has been changed to clarify that this module cannot be employed for validation until activity data has been allocated to the project (see Section 5.3.1.2). |
| Aster Global Assessment | The methodology developer provided clarification that the text identified as confusing in a previous version of the module has been updated, and referenced Section 5.3.1.2. The assessment team reviewed the referenced section and determined the updates made are sufficient to address the commenter's question. Item addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Text has been changed to clarify that this module cannot be employed for validation until activity data has been allocated to the project (see AUDef Section 5.3.24.2). |

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| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 165 |
| Question | General |
| Section | Module BL-UD, v1.0 |
| Page (if relevant) | 7 |
| Line (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Reviewer Country | Zambia |
| Response(s) - including general questions & comments | Can we please have a solid definition of what constitutes as wetland soils, and if there is to be a minimum parcel size for their delineation. |
| Verra Response | Added a reference to the <i>2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands</i> to Section 5.3.1.1, the first place 'wetland soils' are referred to. There are many different types of wetland soils, so referring to the IPCC guidance is better than including a lengthy definition in <i>AUDef</i> . |
| Aster Global Assessment | The assessment team is unable to locate the reference in the current version under assessment, MD00XX, Module for Avoiding Unplanned Deforestation 2023.04.03 |
| Aster Global Initial Findings | CL: Please add reference |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Added a reference to the 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands to Section 5.3.1.1, the first place 'wetland soils' are referred to. There are many different types of wetland soils, so referring to the IPCC guidance is better than including a lengthy definition in <i>AUDef</i>.</p> <p>Explanation of original Verra Response: Original response fully and correctly responded to the comment.</p> <p>Response to additional points raised by Aster: The reference is in the footnote 5 of section 5.3.1.1</p> |
| Aster Global Findings Round 2 | <p>The commenter requested a clear definition of wetland soils. The methodology developer responded by adding reference to the 2013 Supplement to the 2006 IPCC Guidelines, specifically Chapter 1.2. The assessment team reviewed Chapter 1.2. While this Chapter provides extensive detail on determination of wetland soils, this section does not appear to address the "solid definition" of wetland soils requested by the commenter.</p> <p>The assessment team is also unclear if the term "wetland soils" as used in the methodology and the term "wetland" as defined in the VCS Program Definitions are congruent and if the methodology intends this requirement to apply to "wetland soils" that don't occur on "wetlands."</p> |
| Round 2 NCR/CL/OFI2 | CL: Please clarify in line with the findings and update the module as necessary. |
| Round 2 Response | Revised Verra comment addressing original public comment: As described in the "2013 Supplement to the 2006 IPCC Guidelines for National |

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| from Methodology Developer | <p>Greenhouse Gas Inventories: Wetlands", many different types and conditions of wetland soils exist, so that no single "solid" definition of them can be issued. It is, in fact, the purpose of Section 1.2 of such reference to provide guidance and criteria for identifying such various types and conditions.</p> <p>Response to additional points raised by Aster: This requirement in module MD00XX is intended to be applied as described in the reference provided. The term "wetland" defined in the <i>VCS Program Definitions</i> refers specifically to wetland as a land-use category, not to wetland soils.</p> |
| Aster Global Findings Round 3 | <p>The Assessment team notes that the Notes in Section 1 of the 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands are sufficient for identified wet organic soils and wetland mineral soils. The original comment asked if there is a minimum parcel size for delineating wetland soils as a stratum. Please respond.</p> |
| Round 3 NCR/CL/OFI | <p>CL: Please clarify in line with the identified finding.</p> |
| Round 3 Response from Methodology Developer | <p>Revised Verra respons to original comment: As described in the "2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands", many different types and conditions of wetland soils exist, so that no single "solid" definition of them can be issued. It is, in fact, the purpose of Section 1.2 of such reference to provide guidance and criteria for identifying such various types and conditions.</p> <p>A minimum parcel size of 2 ha for the delineation of strata (including forested wetland soils) has been added to the introductory paragraph of AUDef Section 5.3.1.1.</p> |
| Aster Global Findings Round 4 | <p>The Meth Developer has adequately addressed the original comment. Closed.</p> |
| Status | <p>closed R4</p> |
| Response Updated Since Finding Closed? | <p>wording/typo updates</p> |
| Revised Verra Response October 2023 | <p>As described in the "2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands", many different types and conditions of wetland soils exist, so that no single "solid" definition of them can be issued. It is, in fact, the purpose of Section 1.2 of such reference to provide guidance and criteria for identifying such various types and conditions.</p> <p>A minimum parcel size of 2 ha for the delineation of strata (including forested wetland soils) has been added to the introductory paragraph of AUDef Section 5.3.42.1.</p> |
| Aster Global Assessment of Revised Response | <p>The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required.</p> |
| Comment # | <p>166</p> |
| Question | <p>4</p> |
| Section | <p>5</p> |
| Page (if relevant) | <p>N/A</p> |
| Line (if relevant) | <p>N/A</p> |
| Reviewer Organization | <p>Biofilica Ambipar Environment; NBS Brazil Alliance; Carbonext</p> |

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| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | <p>We do prefer to rely on centrally produced FCBMs as long as they have substantial methodological foundation, transparency, time series consistency, recurrence and availability. Others Alliance's member prefer and see their selves producing FCBMp if the centrally produced ones are too coarse. However, we are not opposed to producing our own FCBMs as long as the standards allow the adoption of land use maps from third-party sources such as Mapbiomas and Prodes. Demand that data be collected as they are apparently suggested in the J-ADB-UB draft (use of high resolution images, sample fields, documentation, validation time by Verra, stratification between planned and unplanned deforestation, licensed and unlicensed deforestation, develop the SOPs, among other requirements, as mentioned before, concern us in the sense of making the development of projects more expensive and increasing the time needed to do so. Once a jurisdiction is implemented, if we understand that regional factors and nuances were not properly captured to generate a risk map, how can we challenge the current jurisdiction? Will we have to develop another one? Who will pay for it?</p> <p>In most cases, it is feasible to make our own maps, mainly due to the possibility of accessing more detailed information, such as the use of high resolution images and local accuracy analysis; within the desired period. In addition, its interesting to make possible the option for proponents to use centrally produced FCBMs, without the obligation to choose one of the options.</p> |
| Verra Response | <p>This approach relies on there being only one FCBM for the jurisdiction. Project proponents can apply to be data service providers and develop the jurisdictional FCBM. They can also provide supplemental materials to the data service provider.</p> <p>If a project-scale FCBM is shown to provide a substantially more accurate estimate than the jurisdictional FCBM, the project FCBM must replace the intersecting portion(s) of the jurisdictional FCBM. The section that addresses this (Appendix 1, A1.4.1 Step 1) has been enhanced to provide clarity around the criteria that a project-level FCBM must meet in order to be incorporated into the jurisdictional FCBM.</p> |
| Aster Global Assessment | <p>The assessment team deems this response to be sufficient. Appendix 1 A1.4.3 Step 1 states "• Where the FCBMp is shown to provide substantially more accurate estimates of the two main classes (area of deforestation over the HRP and area of forest at the end of HRP) than the jurisdictional FCBM, the FCBMp must replace the portions of the jurisdictional FCBM with which it intersects. ".</p> <p>However, the commenter asks "how can we challenge the current jurisdiction?". In another comment, Verra replied there is a process to resolve complains by means of contacting Verra. Is this not the case here and--if so, is it possible to make this clear in the methodology?</p> |
| Aster Global Initial Findings | CL: Please clarify in line with findings. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: This approach relies on there being only one FCBM for the jurisdiction. Project Proponents can provide supplemental materials to the data service provider including FCBMs.</p> <p>If a project-scale FCBM is shown to provide a substantially more accurate estimate than the jurisdictional FCBM, the project FCBM must replace the intersecting portion(s) of the jurisdictional FCBM. The section that addresses this (Appendix 1, A1.4.1 Step 1) has been enhanced to provide clarity around the criteria that a project-</p> |

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| | <p>level FCBM must meet in order to be incorporated into the jurisdictional FCBM.</p> <p>Explanation of original Verra Response: Clarified that as of July 2023, Verra does not envision allowing PPs to become data service providers.</p> <p>Response to additional points raised by Aster: 1) Noted 2) Verra does not intend to put in place a formal mechanism for challenging the definition of the jurisdiction. Verra retains the final authority on defining the jurisdiction for application with this module. Appendix 4 describes the opportunity for PPs and other stakeholders to submit definitions of the jurisdiction, and it states that definitions aligned with existing government plans around jurisdictional REDD programs should be prioritized. Verra also conducts outreach to governments and known project proponents in each jurisdiction prior to initiating contracting of data development.</p> |
| Aster Global Findings Round 2 | The methodology developer has clarified that a formal mechanism challenging the definition of the jurisdiction will not be developed. Additional clarification is provided, sufficient to close the identified finding. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>This approach relies on there being only one FCBM for the jurisdiction. Project proponents can provide supplemental materials to the data service provider including FCBMs.</p> <p>If a project-scale FCBM is shown to provide a substantially more accurate estimate than the jurisdictional FCBM, the project FCBM must replace the intersecting portion(s) of the jurisdictional FCBM. The section that addresses this (AUDef Appendix 1, A1.4.34 Step 1) has been enhanced to provide clarity around the criteria that a project-level FCBM must meet in order to be incorporated into the jurisdictional FCBM.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 167 |
| Question | General |
| Section | 5.3 |
| Page (if relevant) | 7 |
| Line (if relevant) | 10 |
| Reviewer Organization | Biofilica Ambipar Environment; NBS Brazil; Carbonext |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | Will it only be possible to create a Forest Stratification Map by carrying out on-site inventories or is it possible to use secondary data? The cost of carrying out a forest inventory is high, and it is difficult to justify carrying it out before receiving the activity data to know the productivity of the project area. |
| Proposed Change(s) | Stratification should be possible to be done using secondary data or reassess over the life of the project |

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| Verra Response | <p>As delineated in the module, forest stratification be based on forest inventories which encompass the UDef project area and leakage belt. As stated, the sampling should be representative of the areas expected to be included in the UDef project area over the project baseline validity period. The specific carbon pool delineates the time period in which data must have been collected. For example, CP-AB Live Biomass states "Measurements of initial stocks employed in the baseline must take place within ± 5 years of the project start date, for simplicity referred to here as stocks at $t=0$."</p> <p>Please note: the text does not state that the forest inventory must have been completed by the project proponent for the given project. Thus, it is allowable for this data to have been developed for other purposes, as long as it complies with all aspects of the methodology.</p> |
| Aster Global Assessment | The assessment team deems this response to be satisfactory and fully address the comment without raising additional concern. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>As delineated in the module, forest stratification be based on forest inventories which encompass the UDef project area and leakage belt. As stated, the sampling should be representative of the areas expected to be included in the UDef project area over the project baseline validity period. The specific carbon pool delineates the time period in which data must have been collected. For example, CP-AB Live Biomass states "Measurements of initial stocks employed in the baseline must take place within ± 5 years of the project start date, for simplicity referred to here as stocks at $t=0$."</p> <p>Please note: the text does not state that the forest inventory must have been completed by the project proponent for the given project. Thus, it is allowable for this data to have been developed for other purposes, as long as it complies with all aspects of the methodology.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 168 |
| Question | General |
| Section | BL-UD |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Biofilica Ambipar Environment & NBS Brazil |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | Short term baseline validity period creates investment uncertainty |
| Proposed Change(s) | New projects that join halfway of a baseline validity period should be allowed to carry over their first baseline allocation and only change it after they have had one full baseline validity period. This promotes investor's confidence. |

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| Verra Response | The following text has been added in Section 8.1.1 of M0184 relating to projects' adoption of the jurisdictional baseline: "Where a project validates or transitions to VM0184 after the initial year of a jurisdictional BVP, the project proponent(s) may choose to request allocation of data from the subsequent jurisdictional BVP when that BVP begins. Alternatively, the initial project BVP may be the duration set out in the VCS Standard – regardless of whether it spans two jurisdictional BVPs. After the initial project BVP, the project must adopt an allocation from the respective jurisdictional baseline. Subsequent project BVPs must be the same duration as the jurisdictional BVP." |
| Aster Global Assessment | The implications of the referenced text are unclear to the assessment team. |
| Aster Global Initial Findings | CL: Please clarify the implications of the referenced text and how it addresses the comment. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Out of practical considerations, Verra has made an allowance for projects during their first baseline validity period to carry over their AD allocation into a subsequent BVP under certain circumstances, as described in Section 8.1.1 of M0184 v0.4. Project proponents may elect to update to the second jurisdictional BVP up to two years after that BVP begins.</p> <p>Explanation of original Verra response: Verra's initial response focused on the carry-over of AD for a projects first BVP. The rules around this allowance have been revised since the original response, and are now reflected in the revised comment above. Additional clarification has been added to address the concern aroud AD allocation being out of date for new projects."</p> |
| Aster Global Findings Round 2 | The assessment team confirms that the language in Section 8.1.1 is now clear and adequately addresses the comment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Out of practical considerations, Verra has made an allowance for projects during their first baseline validity period to carry over their AD allocation into a subsequent BVP under certain circumstances, as described in AUDef Section 5.3.1-8.1.1 of M0184. Project proponents may elect to update to the second jurisdictional BVP up to two years after that BVP begins. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 169 |
| Question | General |
| Section | 5.1.1.1 |
| Page (if relevant) | 6 |
| Line (if relevant) | N/A |
| Reviewer Organization | Biofilica Ambipar Environment & NBS Brazil Alliance |
| Reviewer Country | Brazil |

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| Response(s) - including general questions & comments | AUD Project Area must be only forest. How it is possible to send the AUD project area without having access to the FCBMj to see what is forest? |
| Proposed Change(s) | The Section 5.1.1.1 (or other more appropriated section) must include some additional guidance on the process of receiving the FCBMj in advance before sending the AUD Project Area |
| Verra Response | Per Appendix 3 Section A3.1, the project proponent must include a KML file with its <i>AD Baseline Allocation Request Form</i> . However, the jurisdictional FCBM will be made public to aid in project area selection. |
| Aster Global Assessment | The methodology developer referenced Section A3.1 of the module, which states that a KML file delineating where project proponents have controlled is to be submitted in the AD baseline allocation request, which is notably not equivalent to the project area. As the FCBM will be made public, projects can utilize this to aid in project area selection. The assessment team determined the project developer's response is adequate in addressing the concern. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Per AUDef Appendix 3 Section A3.1, the project proponent must include a KML file with its AD Baseline Allocation Request Form. However, the jurisdictional FCBM will be made public to aid in project area selection. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 171 |
| Question | 5 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Biofilica Ambipar Environment; NBS Brazil Alliance; Carbonext |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | We hope to adopt procedures that we believe are less costly and that, at the same time, guarantee transparency in the process and quality in the credit generated. We see with good eyes the intention to prepare ourselves for a new moment, which will demand better practices in all aspects. However, it would not be in good form for the new mechanisms and procedures to harm private initiatives that have already matured in this market. We understand that the current procedures have certain flaws and are complex, but they are robust enough to safely estimate the reduction of emissions from avoided deforestation, because they are based on consolidated scientific methods. The implementation of new methodological approaches, especially when they are in order to simplify the process, will always be welcome. However, we understand that it is necessary to carry out tests, have a period for the transition and a period for the evaluations to be carried out in a judicious and in-depth way. |
| Verra Response | We have tested various parts of <i>AUDef</i> and hope to make the results public soon. |

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| Aster Global Assessment | Verra responded by stating it hopes to release a case study. The assessment team asks that Verra give a more definitive answer. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Thank you for your comment. Experience will be gained through application of the methodology to the initial batch of 12 jurisdictions, and there will be opportunities to improve based on learnings.</p> <p>Explanation of original Verra Response: The original response is accurate, but Aster Global asks for information not requested in the original public comment. The original public comment does not request that Verra produce or release any testing results.</p> <p>Response to additional points raised by Aster: At this point in time, Verra cannot confirm a timeline for releasing of any testing results. It should be remembered, however, that testing and piloting are not a requirement of a new VCS methodology.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Thank you for your comment. Experience will be gained through application of the methodology to the initial batch of 132 jurisdictions, and there will be opportunities to improve based on learnings. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 172 |
| Question | 4 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general | This will depend on the quality (accuracy) and cost of these maps and the level of detail and transparency regarding the process to produce this map. Some have in-house capacity to produce FCBMs and would likely do this if we perceive we could produce a better FCBM than provided by Verra. Please also indicate whether |

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| questions & comments | requesting FCBMs from Verra would incur an additional cost or would be included in the cost of producing the activity data. |
| Verra Response | Allocation of data by Verra will be required and will be at a cost to project proponents, regardless of whether or not they have submitted supplemental data (including FCBMp). |
| Aster Global Assessment | Verra has stated that--regardless of whether a PP develops and uses their own FCBMp--they must be the same fee. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Allocation of data by Verra will be required and will be at a cost to project proponents, regardless of whether or not they have submitted supplemental data (including FCBMp). |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 173 |
| Question | 5 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Yes, we consider that a sampling-based approach would be suitable for producing degradation data, and this better captures the situation on-the-ground within project areas as well as opening opportunities for additional emissions reductions and credit generation. |
| Verra Response | N/A |
| Aster Global Assessment | No response required. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | N/A |
| Comment # | 174 |
| Question | General |
| Section | 5.3 Creation of project Forest Stratification Map |
| Page (if relevant) | 6 |

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| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | It is not clear how the accuracy of the Non-AUD area will be assessed. |
| Proposed Change(s) | Please add an explanation or modify the module. |
| Verra Response | If the project includes non-AUD project areas, the delineation of such areas is the responsibility of the project proponent. All areas within the AUD project area must meet the additionality criteria set by the application of the additionality tool. The spatially mapping of such areas will be assessed during project validation. |
| Aster Global Assessment | The assessment team has determined the response from Verra is sufficient and address the original comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | If the project includes non-AUD project areas, the delineation of such areas is the responsibility of the project proponent. All areas within the AUD project area must meet the additionality criteria set by the application of the additionality tool. The spatially mapping of such areas will be assessed during project validation. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 175 |
| Question | General |
| Section | 5.3 Creation of project Forest Stratification Map |
| Page (if relevant) | 6 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | It's not clear why no accuracy target is required for the Forest Stratification Map, and no justification is provided. Uncertainty in the inventory can be reduced with more intense sampling, but the potential for a low-accuracy stratification map will remain, and, therefore, there will be no guarantee the inventory plots will be classified within the correct stratum. |
| Proposed Change(s) | Please add an explanation or modify the module. |
| Verra Response | As stated in Section 5.3.1.1, no accuracy standard applied as the spatial accuracy of classes will be reflected in the calculation of uncertainty around inventoried carbon stocks for each mapped stratum. |
| Aster Global Assessment | The methodology developer addressed the commenters concern of no accuracy target for the FSM by citing Section 5.3.1.1 which states this will be factored into the |

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| | uncertainty. The assessment team determined this response appropriately addresses the commenter's concern. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | As stated in AUDef Section 5.3.24.1, no accuracy standard applied as the spatial accuracy of classes will be reflected in the calculation of uncertainty around inventoried carbon stocks for each mapped stratum. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 176 |
| Question | General |
| Section | 5.3. Estimation of baseline Annual Area of unplanned deforestation within AUD Project Boundary |
| Page (if relevant) | 8 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Instead of introducing new terms (e.g., "UD Activity Class"), continue using the terms AD-C and LCT from the other modules. Otherwise, there is a risk of introducing additional confusion in a methodology that already has many variables and parameters. |
| Proposed Change(s) | Please edit for clarity. |
| Verra Response | These terms have been eliminated. |
| Aster Global Assessment | The methodology developer clarified that the terms identified as confusing by the commenter have been eliminated in the updated version of the module. This item is addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | These terms have been eliminated. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 177 |
| Question | General |
| Section | 5.5. Estimation of Emissions from carbon stock changes |

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| Page relevant) (if | 11 |
| Line relevant) (if | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Step 1: Estimation of (non-wetland) carbon stocks per forest stratum Methodologies allow many different approaches for carbon stock estimation, ranging from permanent plot-based sampling to IPCC default values. Please confirm which of these approaches are valid under the new methodology. In addition, how will the LTA for non-forest be assessed? Will the PP be required to use space-for-time substitution? Or will ongoing monitoring be required and a moving average then used? |
| Proposed Change(s) | Please add an explanation or modify the module. |
| Verra Response | The procedures for sampling design are delineated in each carbon pool module. Detailed requirements to determine the LTA are not delineated in the methodology, but the methodology does include guidance on the allowable sources of such information. No ongoing monitoring is required. |
| Aster Global Assessment | The commenter requested an explanation regarding allowable carbon stock estimation approaches. The methodology developer clarified that the sampling designs are delineated in respective carbon pools, not the new module, thus addressing the comment. In response to a question pertaining to LTA, the methodology developer clarified that determination of LTA is not delineated by the methodology, though guidance on allowable sources are provided. Further clarification is provided that no ongoing monitoring is required. The assessment team determine the response addresses the commenter's question. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The procedures for sampling design are delineated in each carbon pool module. Detailed requirements to determine the LTA are not delineated in the methodology, but the methodology does include guidance on the allowable sources of such information. No ongoing monitoring is required. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 178 |
| Question | General |
| Section | 5.5. Estimation of Emissions from carbon stock changes |
| Page relevant) (if | 14 |
| Line relevant) (if | N/A |
| Reviewer Organization | Conservation International (CI) |

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|---|---|
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Step 4: Estimation of an Uncertainty Discount Factor For "forest type map", do you mean forest stratification map? |
| Proposed Change(s) | Instead of confusing readers by introducing the new term "forest type map", please choose one term and use consistent language in all modules (e.g., "forest stratification") |
| Verra Response | This section (5.3.1.3 Step 4) has been updated to eliminate this error. |
| Aster Global Assessment | Due account was taken by the methodology developer updating terms identified as confusing by the commenter. This item is addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | This section (AUDef Section 5.3.24.3 Step 4) has been updated to eliminate this error. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 179 |
| Question | General |
| Section | 5.5. Estimation of Emissions from carbon stock changes |
| Page (if relevant) | 18 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Step 5: Conservative Emissions from carbon stock change Estimation The text states, "This shall be undertaken for above-ground biomass, below-ground biomass, litter and deadwood; and soil-organic carbon and carbon stocks entering the wood products pool separately." This sentence is poorly worded and should be edited for clarity. |
| Proposed Change(s) | Please edit for clarity. |
| Verra Response | This section (5.3.1.3 Step 5) has been edited |
| Aster Global Assessment | Due account was taken by the methodology developer revising the sentence identified as confusing for clarity. This item is addressed, |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |

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| Revised Verra Response October 2023 | This section (AUDef Section 5.3.24.3 Step 5) has been edited |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 180 |
| Question | General |
| Section | 5.6 Estimation of the annual baseline emissions from carbon stock changes |
| Page (if relevant) | 20 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | The methodology provides a decay rate for wood products and soils without providing a reference/source or justification. |
| Proposed Change(s) | Please provide a reference or justification for this assumed 1/20 decay rate for wood products and soils. |
| Verra Response | This is justified in Section 3.6.4 of the <i>VCS Methodology Requirements</i> |
| Aster Global Assessment | This item is pending, as the assessment team has identified findings pertaining to the concern raised by the commenter. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: This is justified in Section 3.6.4 of the VCS Methodology Requirements</p> <p>Explanation of original Verra Response: Verra affirms its original response.</p> <p>Response to additional points raised by Aster: It is not clear what Aster is referring to. Decay rate of HWP is defined by the VCS standard, not this module, and is therefore out of scope.</p> |
| Aster Global Findings Round 2 | The assessment team confirms that the decay rates are justified in the VCS Methodology Requirements and are appropriately utilized in the module. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Decay rates are This is justified in Section 3.6.4 of the <i>VCS Methodology Requirements</i> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |

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| Comment # | 181 |
| Question | 4 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Terra Global Capital, LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>Yes, we believe we will be submitting Forest Cover Benchmark Maps (FCBMs) to Verra but want to be able to do this for the whole jurisdiction. Accuracy of maps includes the incorporation of in-country expertise, as well as ground-truthed datasets. We are concerned that if this expertise is “Farmed out” by Verra, unexperienced AD providers with no local context who will an create LU-LC maps that are inaccurate and miscalculate emissions.</p> <p>For our projects and programs under Verra, we have gone to great lengths to understand LUC conditions and dynamics in our project areas. In order to understand the dynamics of shifting systems and mosaic deforestation, often these processes take years of revisiting area to understand how conditions on the ground relate to conditions seen though remote sensing. In addition, there is not a clear description of how project proponents will access FCBMs. Many project proponents including forest reliant and indigenous communities do not have the funds to pay Verra for FCBMs.</p> |
| Verra Response | <p>This approach relies on there being only one FCBM for the jurisdiction. Project proponents can apply to be data service providers and develop the jurisdictional FCBM. They can also provide supplemental materials to the data service provider.</p> <p>If a project-scale FCBM is shown to provide a substantially more accurate estimate than the jurisdictional FCBM, the project FCBM must replace the intersecting portion(s) of the jurisdictional FCBM. The section that addresses this (Appendix 1, A1.4.1 Step 1) has been enhanced to provide clarity around the criteria that a project-level FCBM must meet in order to be incorporated into the jurisdictional FCBM.</p> <p>'Allocation of data by Verra will be required and will be at a cost to project proponents, regardless of whether or not they have submitted supplemental data (including FCBMp). However, this will level the playing field and may enable marginalized groups better access to better quality data.</p> |
| Aster Global Assessment | <p>Verra stated "Allocation of data by Verra will be required and will be at a cost to project proponents, regardless of whether or not they have submitted supplemental data (including FCBMp). However, this will level the playing field and may enable marginalized groups better access to better quality data.". It is unclear how this is the case.</p> |
| Aster Global Initial Findings | <p>CL: Please provide additional reasoning to support Verra's response.</p> |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <p>1) This approach relies on there being only one FCBM for the jurisdiction. Project proponents can provide supplemental materials to the data service provider regarding construction.</p> <p>2) If a project-scale FCBM is shown to provide a substantially more accurate estimate than the jurisdictional FCBM, the project FCBM must replace the intersecting portion(s) of the jurisdictional FCBM. The section that addresses this (Appendix 1, A1.4.1 Step 1) has been enhanced to provide clarity around the criteria that a project-</p> |

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| | <p>level FCBM must meet in order to be incorporated into the jurisdictional FCBM.</p> <p>3) Allocation of data by Verra will be required and will be at a cost to project proponents, regardless of whether or not they have submitted supplemental data (including FCBMp). However, this will level the playing field and may enable marginalized groups better access to better quality data. Otherwise, developers with access to large financial resources would be better able to capture and influence the process of data creation for all projects.</p> <p>Explanation of original Verra Response: Original response was clarified to explain how only permitting one FCBM levels the playing field for all developers.</p> <p>Response to additional points raised by Aster: Data creation is relatively fixed cost, regardless of the size of projects. This puts small projects at a competitive disadvantage. Verra can use its to-be-finalized fee structure to ensure that costs are distributed more equitably and allow better opportunities for projects of all scales.</p> |
| Aster Global Findings Round 2 | The methodology developer has provided a reasonable rationale supporting the response in question. This item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>1) This approach relies on there being only one FCBM for the jurisdiction. Project proponents can provide supplemental materials to the data service provider regarding construction.</p> <p>2) If a project-scale FCBM is shown to provide a substantially more accurate estimate than the jurisdictional FCBM, the project FCBM must replace the intersecting portion(s) of the jurisdictional FCBM. The section that addresses this (Appendix 1, A1.4.1 Step 1) has been enhanced to provide clarity around the criteria that a project-level FCBM must meet in order to be incorporated into the jurisdictional FCBM.</p> <p>3) Allocation of data by Verra will be required and will be at a cost to project proponents, regardless of whether or not they have submitted supplemental data (including FCBMp). However, this will level the playing field and may enable marginalized groups better access to better quality data. Otherwise, developers with access to large financial resources would be better able to capture and influence the process of data creation for all projects.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 182 |
| Question | 5 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Terra Global Capital, LLC |
| Reviewer Country | USA |

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| Response(s) - including general questions & comments | Yes, around the globe conditions exist where emissions from degradation are more significant than deforestation. Having FCBMs only account for deforestation and not degradation, or forest enhancements is an incomplete data set and missing targets of deforestation. Terra Global has been successful in identifying multiple forest strata and the dynamic process of forest degradation. This process is documented in the VCS validated and verified Kulera REDD+ Program in Malawi and our JNR baseline in Myanmar. |
| Verra Response | AUDef only includes deforestation. It is envisioned that a future module will incorporate unplanned forest degradation. In the VCS Program, planned forest degradation is treated as an improved forest management activity. |
| Aster Global Assessment | The VVB understands that Verra may and in the future develop a module that incorporates degradation. However, as described in the assessment plan the scope of the methodology assessment incorporates both the AUD Module and the M0184 methodology so it is unclear to the VVB how to assess public comments that may be addressed in the future by Verra. |
| Aster Global Initial Findings | CL: Please clarify in line with the finding and elicit guidance from the Independent Team at Verra. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: AUDef only includes deforestation. It is envisioned that a future module will incorporate unplanned forest degradation. In the VCS Program, planned forest degradation is treated as an improved forest management activity.</p> <p>Explanation of original Verra Response: Response is comprehensive and accurate</p> <p>Response to additional points raised by Aster: Many public comemnts present ideas and concepts that are outside of the scope of the document provided for public review. It is sufficient for Verra to state that the version of the document that will be validated will not address the suggestion of the original commenter. Statements about future plans are provided as contextual information to commenters, but such statements do not create an obligation to corroborate those statements in a passage in the modules under review.</p> |
| Aster's initial response is in/out of scope for VVB review | out |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | AUDef only includes deforestation. It is envisioned that a future module will incorporate unplanned forest degradation. In the VCS Program, planned forest degradation is treated as an improved forest management activity. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 183 |

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| Question | General |
| Section | 5.1.2 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Terra Global Capital, LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | This allows from gaps from the end of the historical reference period to the project start, which is poor practice |
| Proposed Change(s) | This should require a new JFCBM is the gap is more then 2 years. |
| Verra Response | Verra acknowledges there could be a gap as large as five years between the end of the historical reference period and the project start date. We will work to reduce and/or eliminate this gap in the future. Given that there needs to be only one set of activity data for each jurisdiction and each baseline validity period (BVP), the most practical way to tighten the gap would be to reduce the BVP. We could also eliminate projects' ability to use the full BVP allotted to them in the initial period, which would ensure that projects update to more appropriate baselines more quickly. However, we understand that this would be a significant burden on project proponents. |
| Aster Global Assessment | The methodology developer acknowledges the gap between the HRP and project start date and lists several potential ways this could be mitigated. However, no course of action or direct response to the proposed change is provided. |
| Aster Global Initial Findings | CL: The assessment team would like to request a conversation with the methodology developer regarding this comment and the response provided. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Because of the need to have only one set of activity data for a given baseline validity period in a jurisdiction, for it will be the case that the project start date does not align with the start of the baseline validity period for most projects. Every year of a baseline validity period after the first year presents a gap from the end of the HRP. The AD allocated to proejects in every year followoing the first year of the BVP is therefore equally 'out of date', regardless if their start date is within this BVP, or if the project began in a previous BVP. Verra is now requiring 6-year baseline renewals for AUDef projects in the VCS Standard, which i itself already a substantial improvement on the previous use of 10 years by most existing AUDef methodologies.</p> <p>Explanation of original Verra response: There is no course of action to be taken in response to the comment since we're not following the suggested path. We explain the rationale for this in the response.</p> |
| Aster's initial response is in/out of scope for VVB review | in scope |
| Aster Global Findings Round 2 | It us unclear how this does not conflict with requirements in existing referenced modules, tools and methodologies. Specifically, VM0007 states "5.2.1 Start Date and End Date of the Historical Reference Period REDD The historical reference period is the temporal domain from which information on historical deforestation is extracted, analyzed and projected into the future. A historical reference period |

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| | <p>must be defined for all eligible REDD categories. The starting date of this period must be between 9 and 12 years in the past and the end date must be within two years before project start date." The verifier requests a discussion or evidence to show that this has been a consideration.</p> |
| <p>Round 2 NCR/CL/OFI2</p> | <p>CL: Please provide evidence to show that conflicts with requirements in existing referenced modules, tools and methodologies were considered in the response to the round 1 finding.</p> |
| <p>Round 2 Response from Methodology Developer</p> | <p>Revised Verra comment addressing original public comment (NO CHANGE FROM ROUND 1): Because of the need to have only one set of activity data for a given baseline validity period in a jurisdiction, it will be the case that the project start date can not align with the start of the baseline validity period for most projects. Every year of a baseline validity period after the first year presents a gap from the end of the HRP. The AD allocated to projects in every year following the first year of the BVP is therefore equally 'out of date', regardless if their start date is within this BVP, or if the project began in a previous BVP. Verra is now requiring 6-year baseline renewals for AUDef projects in the <i>VCS Standard</i>, which is itself already a substantial improvement on the previous use of 10 years by most existing AUDef methodologies.</p> <p>Response to Aster Round 2 CL: VM0007 is currently undergoing a correction and clarification with the same definition of historical reference period as used in M0184 ("A fixed period of time during which factors must be considered to make future projections of deforestation, as set out in the <i>VCS Methodology Requirements</i>"). Similar clarifications and minor revisions are being made throughout that doc and in VMD0007. Upon conclusion of this methodology assessment process, we'll proceed with minor revisions to all VM0007 modules referenced by this and other methodologies to ensure they can be used on a standalone basis.</p> |
| <p>Aster Global Findings Round 3</p> | <p>The assessment team notes that the definitions will be out of alignment until the referenced updates are made to VM0007. It is unclear if this is in line with the VCS Principle of Consistency.</p> |
| <p>Round 3 NCR/CL/OFI</p> | <p>CL: Please clarify in line with the identified finding.</p> |
| <p>Round 3 Response from Methodology Developer</p> | <p>Revised Verra comment addressing original public comment (NO CHANGE FROM ROUND 1): Because of the need to have only one set of activity data for a given baseline validity period in a jurisdiction, it will be the case that the project start date can not align with the start of the baseline validity period for most projects. Every year of a baseline validity period after the first year presents a gap from the end of the HRP. The AD allocated to projects in every year following the first year of the BVP is therefore equally 'out of date', regardless if their start date is within this BVP, or if the project began in a previous BVP. Verra is now requiring 6-year baseline renewals for AUDef projects in the <i>VCS Standard</i>, which is itself already a substantial improvement on the previous use of 10 years by most existing AUDef methodologies.</p> <p>Response to Aster Round 3 CL: We plan to release corrections and clarifications to VM0007 before the M0184 is released.</p> |
| <p>Final Findings</p> | <p>The assessment team received confirmation from the VCS Methodologies Director that the referenced modules have been updated. The assessment team determined this is sufficient to close the identified finding.</p> |
| <p>Status</p> | <p>closed R4</p> |
| <p>Response Updated</p> | <p>no</p> |

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| Since Finding Closed? | |
| Revised Verra Response October 2023 | Because of the need to have only one set of activity data for a given baseline validity period in a jurisdiction, it will be the case that the project start date can not align with the start of the baseline validity period for most projects. Every year of a baseline validity period after the first year presents a gap from the end of the HRP. The AD allocated to projects in every year following the first year of the BVP is therefore equally 'out of date', regardless if their start date is within this BVP, or if the project began in a previous BVP. Verra is now requiring 6-year baseline renewals for AUDef projects in the <i>VCS Standard</i> , which is itself already a substantial improvement on the previous use of 10 years by most existing AUDef methodologies. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 184 |
| Question | General |
| Section | 5.2 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Terra Global Capital, LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | This statement refers the Project submitting FCBMP "Verra will reach a decision on whether or not to integrate an FCBMp into the Jurisdictional FCBM based on a validation dataset. Details on this are provided in module J-ADB-UD, Section 5.5.3." |
| Proposed Change(s) | The Project should be able to submit the Jurisdictional FCBM which will be used subject to VVB approval and Verra approval. Verra will not create a Jurisdictional FCBM unless requested by the Project. |
| Verra Response | <p>This approach relies on there being only one FCBM for the jurisdiction. Project proponents can apply to be data service providers and develop the jurisdictional FCBM. They can also provide supplemental materials to the data service provider.</p> <p>If a project-scale FCBM is shown to provide a substantially more accurate estimate than the jurisdictional FCBM, the project FCBM must replace the intersecting portion(s) of the jurisdictional FCBM. The section that addresses this (Appendix 1, A1.4.1 Step 1) has been enhanced to provide clarity around the criteria that a project-level FCBM must meet in order to be incorporated into the jurisdictional FCBM.</p> |
| Aster Global Assessment | The assessment team confirms that revisions to the Module have clarified that project developers can either a) develop their own FCBMp and use that for the project area and leakage belt, provide they meet certain criteria and b) project developers can be selected as DSPs to develop jurisdictional FCBMs. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |

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| Revised Verra Response October 2023 | See comment #166 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 185 |
| Question | General |
| Section | 5.4 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Terra Global Capital, LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | The requirements that the area needs to be a jurisdiction and meet these new (ARTrees looking) minimum size is problematic in a number of ways. This makes no sense to "If the country is larger than 2.5 million hectares and the second-level administrative Jurisdiction (i.e., one administrative level below the national level) is smaller than 5 million hectares, the boundary of the second-level administrative Jurisdiction may be selected" |
| Proposed Change(s) | Again, why should these different from JNR requirements. Make them the same as JNR. |
| Verra Response | How a jurisdiction is defined has been updated (see Appendix 1 Section A1.2.1). Because there is no government proponent, the definition can't be exactly the same as it is in JNR. |
| Aster Global Assessment | The assessment team confirms that revisions to the Module have removed the minimum size criteria and significantly change how a jurisdiction is delineated. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | See comment #84 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 186 |
| Question | General |
| Section | 5.4 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Terra Global Capital, LLC |

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| Reviewer Country | USA |
| Response(s) - including general questions & comments | The requirements that the area needs to be a jurisdiction and meet these new (ARTrees looking) minimum size is problematic in a number of ways. This makes no sense to "If the country is larger than 2.5 million hectares and the second-level administrative Jurisdiction (i.e., one administrative level below the national level) is smaller than 5 million hectares, the boundary of the second-level administrative Jurisdiction may be selected" |
| Proposed Change(s) | Again, why should these differ from JNR requirements. Make them the same as JNR. |
| Verra Response | How a jurisdiction is defined has been updated (see Appendix 1 Section A1.2.1). Because there is no government proponent, the definition can't be exactly the same as it is in JNR. |
| Aster Global Assessment | The assessment team confirms that revisions to the Module have removed the minimum size criteria and significantly change how a jurisdiction is delineated. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | See comment #84 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 187 |
| Question | 4 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Kennemer Eco Solutions |
| Reviewer Country | Philippines |
| Response(s) - including general questions & comments | The BL-UD Module refers to the necessity to have at least 3 Forest Cover Benchmark Maps (FCBMs) for the baseline period. This requires a timeline of wall-to-wall mapping of the jurisdictional reference region. A change detection between those 3 would already allow to generate observed historic deforestation. We do not understand why Stratified Sampling (LUC plot visual observation & interpretation) is still mandatory to generate observed historic deforestation when the 3 (or more) FCBMs are already developed and able to provide that. |
| Proposed Change(s) | We agree with the need to make minimum 3 historic FCBMs mandatory. We continue to think that Verra should consider making Stratified Sampling of LUC optional, but consider the option to derive historic observed deforestation from comparison of wall-to-wall mapped FCBMs directly in order to stay aligned with the majority of national land cover change and FREL mapping data (Brazil, Indonesia, DRC, many others) and allow for the option for save on the considerable manual Stratified Sampling approach. |
| Verra Response | See updated text in Appendix 1 Section A1.4.3 Step 1 for the development of FCBMs. |

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| | The methods required to develop the AD at the jurisdictional level are delineated in the Appendix 1. This requires a sampling based approach. |
| Aster Global Assessment | The assessment team understands this process has made revised. The response from verra sufficiently address the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | See updated text in AUDef Appendix 1 Section A1.4.3 Step 1 for the development of FCBMs. The methods required to develop the AD at the jurisdictional level are delineated in the Appendix 1. This requires a sampling based approach. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 188 |
| Question | General |
| Section | 4 |
| Page (if relevant) | 5 |
| Line (if relevant) | N/A |
| Reviewer Organization | Green Growth Consulting Firm |
| Reviewer Country | Bhutan |
| Response(s) - including general questions & comments | Applicability conditions is doubtful e.g., where it is applicable? |
| Proposed Change(s) | The applicability conditions should be directly relevant to field circumstances (forest land conversion to hydropower, roads, govt. buildings, electricity transmission lines which are unplanned by forestry sector but planned by other relevant sectors) |
| Verra Response | The applicability conditions have been revised. |
| Aster Global Assessment | Section 4 in the Module has been substantially revised, provided much greater specificity and detail than the applicability conditions in BL-UD. Because of this--and because the assessment team has issued additional findings related to additionality--this comment is sufficiently addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The applicability conditions have been revised. |

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| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 189 |
| Question | 4 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Radicle Group |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | Yes, we foresee submitting Forest Cover Benchmark Maps. In Brazil, that are some tools and dataset that can be used to develop those, such as MapBiomass (a very complete platform regarding land cover) and the national inventory (https://www.florestal.gov.br/inventario-florestal-nacional). |
| Verra Response | N/A |
| Aster Global Assessment | No response required. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | N/A |
| Comment # | 190 |
| Question | 5 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Radicle Group |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | Yes. We follow scientific advances on different approaches for those calculations, which could be considered to complement estimates, whenever necessary (e.g. https://www.intechopen.com/chapters/76307). |
| Verra Response | N/A |
| Aster Global Assessment | No response required. |
| Status | closed R1 |

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| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | N/A |
| Comment # | 191 |
| Question | 4 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Netherlands |
| Reviewer Country | The Netherlands |
| Response(s) - including general questions & comments | As a project developer, do you foresee yourself submitting Forest Cover Benchmark Maps (FCBMs) for the project area or would you prefer to rely on centrally produced FCBMs? |
| Verra Response | N/A |
| Aster Global Assessment | No response required. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | N/A |
| Comment # | 192 |
| Question | General |
| Section | 5.3 |
| Page (if relevant) | 8 |
| Line (if relevant) | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including general questions & comments | Typo: In the event that a large-scale natural disturbance ² is identified during Monitoring to [take] have taken place within the AUD Project area and/or AUD leakage belt over the baseline validity period |
| Proposed Change(s) | Remove the word take |

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| Verra Response | This typo has been removed (see the last paragraph of Section 5.3.1.1). |
| Aster Global Assessment | The methodology developer took due account by removing the typo identified by the commenter. This item is addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | This typo has been removed (see the last paragraph of AUDef Section 5.3.24.1). |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 193 |
| Question | 4 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | The project developer has the competences for the generation of the FCB maps. There are uncertainties as to whether there is a cost-benefit relationship for the project developer to centralize the processes in terms of cost, time, access to information and approval facilities. |
| Verra Response | N/A |
| Aster Global Assessment | It is unclear why Verra has deemed this comment as N/A. |
| Aster Global Initial Findings | CL: Please address the comment. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Thank you for your feedback. PPs may always produce project-scale FCBMp's. PPs cannot serve as data service providers for the jurisdiction, but they may submit/recommend data to support creation of FCBMj.</p> <p>Explanation of original Verra Response: Comment provides information on the capacities of South Pole, but does not critique the provisions of the module.</p> <p>Response to additional points raised by Aster: There is no recommendation or critique to address.</p> |
| Aster's initial response is in/out of | out |

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| scope for VVB review | |
| Aster Global Findings Round 2 | The revised comment now provides a direct response to the commenter. The assesment team concurs that there is no reccommendation or critique to address. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Thank you for your feedback. PPs may always produce project-scale FCBMP's. PPs cannot serve as data service providers for the jurisdiction, but they may submit/recommend data to support creation of FCBMj. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 194 |
| Question | 5 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | We do expect to include degradation, however, it is not clear how methodologies (e.g. Methodology VM0009) allow the estimation of degradation baseline independently. |
| Verra Response | See comment #182 |
| Aster Global Assessment | The assessment team has concerns over whether the independent modules will ensure no conflict or omission of lands if their baselines are assessed separately. While the assessment team will continue discussions with Verra over this, this comment is outside the scope of the AUD module. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | See comment #182 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 195 |
| Question | General |

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| Section | 5.4.1 |
| Page (if relevant) | 10 |
| Line (if relevant) | Equation 1 to 4 |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | ADpa,lct,r,t is a parameter given in ha/year, dividing the result by the JBVP does not seem appropriate |
| Proposed Change(s) | Remove either the JBVP length or the values of AD per year in the equation |
| Verra Response | These equations have been updated; the parameters are no longer valid |
| Aster Global Assessment | The methodology developer took due account by clarifying that the equations/parameters of concern are no longer valid in the new version of the module, as they have been since updated. This comment is addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | These equations have been updated; the parameters are no longer valid |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 196 |
| Question | General |
| Section | Definitions |
| Page (if relevant) | 4 |
| Line (if relevant) | 15 |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | "The AUD-PA remains fixed for the duration ..." |
| Proposed Change(s) | Should be "The AUD-LB remains fixed for the duration ..."? |
| Verra Response | The typo has been eliminated |

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| Aster Global Assessment | The methodology developer took due account by fixing the typo identified by the commenter. This item is addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The typo has been eliminated |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 197 |
| Question | General |
| Section | 5.1.1.1 |
| Page (if relevant) | 6 |
| Line (if relevant) | 17 |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | Does the AUD project area include forest lands with a risk 0 of deforestation? If it does not, what happen if, in the baseline revalidation, a forest area previously in risk class 0 has evolved to a risk class different? |
| Verra Response | The UDef project area is defined by the project proponent, and thus can include areas with a risk class of 0. |
| Aster Global Assessment | The assessment team deems this response sufficient and addresses the original comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The UDef project area is defined by the project proponent, and thus can include areas with a risk class of 0. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 198 |
| Question | General |
| Section | 5.3 |
| Page (if relevant) | 8 |
| Line (if relevant) | 3 |

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| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | "Within the leakage belt (but not within the PA)..." Why not in the PA? Also, in the PA, the type of forests described in the paragraph could be considered as "non-AUD". |
| Verra Response | This section has been removed. However, UDef project area is defined by the project proponent, and thus is assumed to only include areas under the unplanned deforestation baseline scenario. |
| Aster Global Assessment | The assessment team deems this response sufficient and addresses the original comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | This section has been removed. However, UDef project area is defined by the project proponent, and thus is assumed to only include areas under the unplanned deforestation baseline scenario. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 199 |
| Question | General |
| Section | 5.4.1 |
| Page (if relevant) | 9 |
| Line (if relevant) | 29 |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | "Digital Maps of AUD Project area Boundaries" |
| Proposed Change(s) | "Digital Maps of AUD Project area and Leakage Belt Boundaries" |
| Verra Response | Error has been updated (Appendix 1 Section A1.4.3 Step 3). |
| Aster Global Assessment | The assessment team confirms this revision has been made. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |

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| Revised Verra Response October 2023 | Error has been updated (AUDef Appendix 1 Section A1.4.3 Step 3). |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 200 |
| Question | General |
| Section | 5.4.1 |
| Page (if relevant) | 10 |
| Line (if relevant) | 8 |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | "non-UD" or "non-AUD"? Is there any difference? |
| Verra Response | This text has been updated. The leakage now includes guidance for including areas not subject to baseline unplanned deforestation from the leakage belt. |
| Aster Global Assessment | The assessment team confirms this revision has been made. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | This text has been updated. The leakage now includes guidance for including areas not subject to baseline unplanned deforestation from the leakage belt. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 201 |
| Question | General |
| Section | 5.4.1 |
| Page (if relevant) | 10 |
| Line (if relevant) | 9 |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general | " <i>ADBSL, LB ...</i> " What happens with <i>ADBSL, PA ...</i> ? There is nothing about it. Is there not a "non-UD" or "non-AUD" stratum in PA? |

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| questions & comments | |
| Verra Response | All areas within the AUDef project area should have the baseline scenario of unplanned deforestation. Thus, there shall be no areas within this area subject to other drivers of deforestation, such as planned deforestation. |
| Aster Global Assessment | The assessment team deems this response as sufficiently addressing the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | All areas within the AUDef project area should have the baseline scenario of unplanned deforestation. Thus, there shall be no areas within this area subject to other drivers of deforestation, such as planned deforestation. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 202 |
| Question | General |
| Section | 5.5 |
| Page (if relevant) | 11 |
| Line (if relevant) | 9 |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | What is the treatment of non-UD (non-AUD?) stratum in the project area? |
| Verra Response | All areas within the AUDef project area should have the baseline scenario of unplanned deforestation and contain forest at the start date of the project. |
| Aster Global Assessment | The assessment team deems this response as sufficiently addressing the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | All areas within the AUDef project area should have the baseline scenario of unplanned deforestation and contain forest at the start date of the project. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 203 |
| Question | General |

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| Section | 5.5 |
| Page (if relevant) | 11 |
| Line (if relevant) | 22 |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | If there is no national dataset, nor peer-reviewed published source, must the developer establish sample plots on the ground? In that case, must it accomplish with some statistical criteria? |
| Verra Response | It allowable for field data to be collected to estimate non-forest carbon pool stocks. As delineated in Section 5.3.1.3 Step 4, an estimate of uncertainty must be calculated. |
| Aster Global Assessment | The assessment team assessment of the Module confirms Verra's response. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | It allowable for field data to be collected to estimate non-forest carbon pool stocks. As delineated in AUDef Section 5.3.24.3 Step 4, an estimate of uncertainty must be calculated. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 204 |
| Question | General |
| Section | 5.5-step 4 |
| Page (if relevant) | 15 |
| Line (if relevant) | 22 |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | Why shall the non-wetland soil carbon pool be set to zero? It is not clear the reason behind it. |
| Verra Response | This text (Section 5.3.1.3 Step 5 Forested Wetlands SOC Pool) is associated with soil emissions only for wetland soils. A different module, <i>BL-PEAT</i> , shall be used for such locations. |
| Aster Global Assessment | The assessment team's assessment of the revised module confirms Verra's response. |
| Status | closed R1 |
| Response Updated | significant change |

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| Since Finding Closed? | |
| Revised Verra Response October 2023 | This text, and all other references to wetlands, has been removed from the module. (Section 5.3.1.3 Step 5 Forested Wetlands SOC Pool) is associated with soil emissions only for wetland soils. A different module, BL-PEAT, shall be used for such locations. |
| Aster Global Assessment of Revised Response | The assessment team notes that significant changes were made in the revised response. However, these changes do not affect the assessment team's initial review and thus no further review is warranted. |
| Comment # | 205 |
| Question | General |
| Section | 5.6.1 |
| Page (if relevant) | 20 |
| Line (if relevant) | 27 |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | Does "living biomass" refers to AGB and BGB? Please, specify. |
| Verra Response | Text clarified (see Section 5.3.1.3 Step 6). |
| Aster Global Assessment | The assessment team has verified no such language exists in the Module. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Text clarified (see AUDef Section 5.3.24.3 Step 6). |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 206 |
| Question | General |
| Section | N/A |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |

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| Response(s) - including general questions & comments | There are no references at the end, nor in the document. Especially important in sections: Estimation of uncertainty in estimating carbon stocks, and Estimation of an Uncertainty Discount Factor |
| Verra Response | The uncertainty discount reflects the <i>VCS Methodology Requirements</i> , so no reference is required |
| Aster Global Assessment | The assessment team understands the uncertainty discount uses the equation in the VCS Meth Req, therefore no reference is required. Additionally, the assessment team has reviewed the references in the revised AUD module |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The uncertainty discount reflects the <i>VCS Methodology Requirements</i> , so no reference is required |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 207 |
| Question | General |
| Section | N/A |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | To list the project "under development" (VCS Standard), do we need the approved J-ADB-UD Description Report from VERRA? For sure, we must need it for listing "under validation". The time (mostly, the delay) for getting the Description Report has a profound impact on the timeline for starting the listing process timely, based on the new VERRA rules about that. |
| Verra Response | Per Appendix 3 Figure 6, the project must list as under development before or at the same time as the project proponent submits an <i>AD Baseline Allocation Request Form</i> . |
| Aster Global Assessment | Several commenters have also inquired about the timeliness of baseline data. Verra has stated they will be timely several times; to assuage concerns from project developers, the Assessment Team would like Verra to detail how this will be accomplished. |
| Aster Global Initial Findings | CL: Please clarify in line with assessor findings. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: 1) Verra has started to develop baseline activity data for 13 jurisdictions, and this data will be available for projects within the next 4-5 months. We have initiated a process for adding more jurisdictions to the data development list. Verra will make sure that the data for all jurisdictions with VCS REDD projects will be available by the end of 2024. |

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| | <p>2) Verra appreciates the interplay between project listing and the eligible start year. Verra has not completely finalized rules around what projects need in order to be listed as under development, and cannot provide more detail now.</p> <p>Explanation of original Verra Response: Additional context provided around issue of listing project as 'under development'</p> <p>Response to additional points raised by Aster: The modules that were provided for public release do not prescribe a timeline for data generation. Therefore Verra considers questions of timeliness, while of utmost importance to the application of the methodology, to be out of scope of the methodology itself.</p> |
| Aster's initial response is in/out of scope for VVB review | out |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | significant change |
| Revised Verra Response October 2023 | <p>1) Verra has started to develop baseline activity data for 13 jurisdictions, and this data will be available for projects within the next 4-5 months. We have initiated a process for adding more jurisdictions to the data development list. Verra will make sure that the data for all jurisdictions with VCS REDD projects will be available by the end of 2024.</p> <p>2) Verra appreciates the interplay between project listing and the eligible start year. Projects may list as "under development" at any time, but will need to submit an AD Baseline Request to receive the data necessary to complete their project description and list as "under validation." Verra has not completely finalized rules around what projects need in order to be listed as under development, and cannot provide more detail now.</p> |
| Aster Global Assessment of Revised Response | The assessment team notes that significant changes were made in the revised response. However, these changes do not affect the assessment team's initial review and thus no further review is warranted. |
| Comment # | 208 |
| Question | 4 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Systemica |
| Reviewer Country | Brazil |
| Response(s) - including general | As a project developer, there is interest in submitting Forest Cover Benchmark Maps (FCBMs) for the project area by themselves. If VERRA centrally conducts FCBMs, some specific area studies can be compromised. According to Xie Y. et al. (2008), a |

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| questions & comments | <p>well-fit vegetation classification system should be carefully designed according to the objective of studies to better represent actual vegetation community compositions, based on: (i) refining class definitions to decrease ambiguity, (ii) adding new classes to more adequately describe the complexity of local vegetation patterns and (iii) using a higher level of classification. However, to keep the overall accuracy of the product in large areas such as continental or global scales, it is preferable to conduct vegetation classification using the data acquired from the same sources and at the same period and applying the same processing methods for the entire region. So, the FCBMs can be developed by a project developer if the methods are standardized and pre-established by VERRA.</p> <p>REFERENCES Xie, Y., Sha, Z., & Yu, M. (2008). Remote sensing imagery in vegetation mapping: a review. <i>Journal of plant ecology</i>, 1(1), 9-23.</p> |
| Verra Response | <p>This approach relies on there being only one FCBM for the jurisdiction. Project proponents can apply to be data service providers and develop the jurisdictional FCBM. They can also provide supplemental materials to the data service provider.</p> <p>If a project-scale FCBM is shown to provide a substantially more accurate estimate than the jurisdictional FCBM, the project FCBM must replace the intersecting portion(s) of the jurisdictional FCBM. The section that addresses this (Appendix 1, A1.4.1 Step 1) has been enhanced to provide clarity around the criteria that a project-level FCBM must meet in order to be incorporated into the jurisdictional FCBM.</p> <p>Please note: the FCBM are not forest type classification maps. These are only forest-non-forest maps. Note: all forest type classification is conducted by the project during forest stratification.</p> |
| Aster Global Assessment | <p>The assessment team confirms that revisions to the Module have clarified that project developers can either a) develop their own FCBMp and use that for the project area and leakage belt, provide they meet certain criteria and b) project developers can be selected as DSPs to develop jurisdictional FCBMs.</p> |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>See comment #166</p> <p>Please note: the FCBM are not forest type classification maps. These are only forest-non-forest maps. Note: all forest type classification is conducted by the project during forest stratification.</p> |
| Aster Global Assessment of Revised Response | <p>The assessment team confirmed that no changes were made to the initial response. No further review is required.</p> |
| Comment # | 209 |
| Question | 5 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |

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| Reviewer Organization | Systemica |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | As a project developer, we are not inclined to estimate emission reductions by avoiding unplanned degradation using existing procedures. However, we are concerned about monitoring degradation in AUD projects where selective logging is taking place with FSC certification. According to the proposed MON-AUD module: "This module is not applicable where selective logging regulated by the project proponent is taking place in the case of the project." In this sense, will AUD projects having FSC certification no longer be eligible? Could Verra clarify this point? |
| Verra Response | This condition no longer exists. |
| Aster Global Assessment | The assessment team confirms this condition no longer exists. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | This condition no longer exists. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 210 |
| Question | 4 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | TNC and partners have been mapping some areas of interest with great precision (e.g. drone imageries) that would provide FCBMs with high precision. It is also a mechanism to ensure that deforestation will be observed only in areas agreed by the PP and therefore minimize errors and inconsistencies. Decentralizing the process also supports Verra in streamlining the process (see comment in the first question). |
| Verra Response | Please note: the FCBM are not forest type classification maps. These are only forest-non-forest maps. Please see Application Guide for procedures to submit project developed FCBM. Note: all forest type classification is conducted by the project during forest stratification. |
| Aster Global Assessment | Verra has clarified FCBMs are coarse categorization maps and stated. Verra has stated, be reference to the module, that PPs can develop their own FCBMp. The assessment team confirms this. |
| Status | closed R1 |
| Response Updated | wording/typo updates |

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| Since Finding Closed? | |
| Revised Verra Response October 2023 | Please note: the FCBM are not forest type classification maps. These are only forest-non-forest maps. Please see ADef Appendix 4 application Guide for procedures to submit project developed FCBM. Note: all forest type classification is conducted by the project during forest stratification. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 211 |
| Question | 5 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Value for Nature Ltd. |
| Reviewer Country | UK |
| Response(s) - including general questions & comments | Yes, by necessity. The new procedures do not identify activity data and allocate degradation areas. Even if they did, it would then be difficult to allocate emission factors to them. More promising is the approach of making biomass maps of the project area using lidar combined with Landsat and other remote sensing imagery. These can be made for each monitoring date and the deltaC compared. This then picks up degradation. |
| Verra Response | The methodology does not dictate how a forest stratification map is created. Thus, any method is allowable by the project. This can include lidar and remote sensing imagery. The current CP-AB module requires ground based measurements to estimate tree biomass. Thus, if an allowance to employ lidar based biomass measurements is requested, it is recommended that the project proponent present this proposition to Verra. |
| Aster Global Assessment | Verra's response reaffirms field-based sampling is required and that remote sensing approaches are not allowed by default; however, PPs may submit allowances for alternative means of measurements. The assessment team asks Verra to consider whether it is appropriate, in the Module, e.g. in Data and Parameters, to specify that allowances are permissible. |
| Aster Global Initial Findings | OFI: Please clarify, in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Thanks for the suggestion. Verra is exploring approaches to avoided degradation accounting and your suggestion will be duly considered in that regard. However, avoided degradation is not part of this methodology, we are not yet in the position to respond to this specific technical recommendation regarding degradation.</p> <p>Explanation of original Verra Response: The original Verra response mistakenly focuses on stratification, which was not the focus of the original comment.</p> <p>Response to additional points raised by Aster: VVB's comment is based on ancillary information provided in original Verra response to the public comment. Because Verra's comment erroneously presented extraneous</p> |

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| | information. Verra considers all discussion of accounting for avoided unplanned degradation to be out of scope of an assessment of this module. |
| Aster's initial response is in/out of scope for VVB review | out |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Thanks for the suggestion. Verra is exploring approaches to avoided degradation accounting and your suggestion will be duly considered in that regard. However, avoided degradation is not part of this methodology, we are not yet in the position to respond to this specific technical recommendation regarding degradation. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 212 |
| Question | 4 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Volkswagen-Climate Partner |
| Reviewer Country | Germany |
| Response(s) - including general questions & comments | We would prefer to submit our own project-level FCBM. These are expected to be more accurate than at the local scale than centrally produced maps. |
| Verra Response | N/A |
| Aster Global Assessment | Verra has not responded to the comment. The assessment team believes this comment to be relevant. |
| Aster Global Initial Findings | CL: Please address the comment. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <p>Thanks for your comment. This possibility has been incorporated in section A1.4.3 of the Module: During the development of jurisdictional FCBMs, all proponents of projects are allowed to submit project-specific FCBMs, provided these meet the requirements stated therein.</p> <p>Explanation of original Verra Response:</p> |

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| | N/A |
| | Response to additional points raised by Aster: N/A |
| Aster Global Findings Round 2 | The methodology developer has provided a direct response to the commenter, clarifying they will have the opportunity to submit project-specific FCBMs. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Thanks for your comment. This possibility has been incorporated in section A1.4.3 of the Module: During the development of jurisdictional FCBMs, all proponents of projects are allowed to submit project-specific FCBMs, provided these meet the requirements stated therein. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 213 |
| Question | 5 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Volkswagen-Climate Partner |
| Reviewer Country | Germany |
| Response(s) - including general questions & comments | Until the new procedures become clear and transparent, it is likely that developers will continue to estimate ERs using previous methods and models until these can be calibrated to the new methods. This is still necessary to provide investors as well as developers a business case for financing such projects, otherwise they are shooting in the dark and investment could dry up. On the other hand, significant variation in methodological outcomes between old and new methods could have a similar chilling effect on new project development. We strongly believe that the VM0009 approach worked the best for protected areas and we suggest that it be adopted as a special case for AUD projects on protected areas. |
| Verra Response | See responses to General Q&A. |
| Aster Global Assessment | The assessment team is unable to determine whether Verra took due account of the comment, given the lack of specificity in the response. |
| Aster Global Initial Findings | CL: Please directly address the comment. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: Drafts of the new methodology have been made public so that PPs can use it for planning new projects that will ultimately be using the new methodology. PPs will also have access to all validated versions of tools referenced in this module. The process and timelines to phase out use of all other VCS avoided deforestation methodologies have been published (and updated as necessary) in Verra's website. This process, however, is not part of the methodology under review. Verra will work to |

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| | <p>keep project proponents continuously updated on the process for transitioning to the new consolidated methodology.</p> <p>Explanation of original Verra Response: Verra response clarified to highlight fact that projects can still estimate their own ERs.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | The methodology developer has clarified timelines of adoption and the project proponent's can still estimate their own Ers. However, the assessment team notes that no response is provided pertaining to the commenter's suggestion on continued use of VM0009. |
| Round 2 NCR/CL/OFI2 | CL: Please clarify in line with idented finding. |
| Round 2 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Drafts of the new methodology have been made public so that PPs can use it for planning new projects that will ultimately be using the new methodology. PPs will also have access to all validated versions of tools referenced in this module. It is advised that project developers and investors use the draft text rather than any existing methodology (including VM0009) which would necessarily give an inaccurate estimation of future ERs.</p> <p>One of the key elements of the allocation approach is to ensure that the activity data baseline is established at the jurisdictional level; therefore, it is inappropriate to have different methodologies used for AUDef projects in the same jurisdiction. The process and timelines to phase out use of all other VCS avoided deforestation methodologies have been published (and updated as necessary) in Verra's website. This process, however, is not part of the methodolgoy under review. Verra will work to keep project proponents continuously updated on the process for transitioning to the new consolidated methodology.</p> <p>Note to Aster: first sentence of second paragraph added.</p> |
| Aster Global Findings Round 3 | The Methodology Developer has now directly addressed the commenter by stating this Methodology and AUD Module will wholly replace all avoided deforestation methodologies. Therefore all newly listed projects within the same jurisdiction will use only this methodology and module. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>Drafts of the new methodology have been made public so that PPs can use it for planning new projects that will ultimately be using the new methodology. PPs will also have access to all validated versions of tools referenced in this module. It is advised that project developers and investors use the draft text rather than any existing methodology (including VM0009) which would necessarily give an inaccurate estimation of future ERs.</p> <p>One of the key elements of the allocation approach is to ensure that the activity data baseline is established at the jurisdictional level; therefore, it is inappropriate to have different methodologies used for AUDef projects in the same jurisdiction. The process and timelines to phase out use of all other VCS avoided deforestation methodologies have been published (and updated as necessary) in Verra's website. This process, however, is not part of the methodolgoy under review. Verra will work to keep project</p> |

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| | proponents continuously updated on the process for transitioning to the new consolidated methodology. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 214 |
| Question | General |
| Section | 5.1.2 |
| Page (if relevant) | 6 to 7 |
| Line (if relevant) | N/A |
| Reviewer Organization | Volkswagen-Climate Partner |
| Reviewer Country | Germany |
| Response(s) - including general questions & comments | The short-term baseline validity period for projects that register after a particular baseline area has already been validated creates investment uncertainty for new projects. |
| Proposed Change(s) | <p>New projects that join mid-way into a baseline validity period should be allowed to carry over their first baseline allocation into one new validity period and only change after they have issued credits for at least one full baseline validity period.</p> <p>Rationale: This would allow new projects to maintain their first baseline for enough time to promote investor confidence, while also allowing them to transition to the standardized validity period in due course.</p> |
| Verra Response | The definition of baseline validity period in M0184 has been changed to include the following: "Where a project validates or transitions to VM0184 after the initial year of the jurisdictional BVP, the initial project BVP will be the duration set out in the VCS Standard. After that initial project BVP, the project must adopt the respective jurisdictional BVP. Subsequent project BVPs must be equal to the jurisdictional BVP. For projects that transition to VM0184 after being registered using VM0006, VM0007, VM0009, VM0015, or VM0037, the initial BVP starts at the date they first verify using VM0184." |
| Aster Global Assessment | The assessment team confirms this revision has been made. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | significant change |
| Revised Verra Response October 2023 | <p>While going an entire BVP in addition to the one that the project joined in was considered by many stakeholders to be too long, roject proponents may elect to update to the second jurisdictional BVP up to two years after that BVP begins (see AUNDef Section 5.3.1).</p> <p>The definition of baseline validity period in M0184 has been changed to include the following: "Where a project validates or transitions to VM0184 after the initial year of the jurisdictional BVP, the initial project BVP will be the duration set out in the VCS Standard. After that initial project BVP, the project must adopt the respective jurisdictional BVP. Subsequent project BVPs must be equal to the jurisdictional BVP. For projects that transition to VM0184 after being registered using VM0006, VM0007,</p> |

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| | VM0009, VM0015, or VM0037, the initial BVP starts at the date they first verify using VM0184." |
| Aster Global Assessment of Revised Response | The assessment team notes that significant changes were made in the revised response. However, these changes do not affect the assessment team's initial review and thus no further review is warranted. |
| Comment # | 215 |
| Question | 4 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Wildlife Conservation Society (WCS) |
| Reviewer Country | Rwanda |
| Response(s) - including general questions & comments | Yes we would foresee doing so, especially where the jurisdictional map was for a much larger area than the project. |
| Verra Response | N/A |
| Aster Global Assessment | The assessment team is unable to understand the context of this comment, e.g. what the concern or suggested change is. This comment is closed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | N/A |
| Comment # | 216 |
| Question | 5 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Wildlife Conservation Society (WCS) |
| Reviewer Country | Rwanda |
| Response(s) - including general questions & comments | We strongly encourage additional degradation procedures to be incorporated into a modular methodology. See additional comments |
| Verra Response | See comment #182 |
| Aster Global Assessment | The assessment team concurs that degradation will be addressed in a separate module. |

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| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | See comment #182 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 217 |
| Question | 6 |
| Section | 5 |
| Page (if relevant) | N/A |
| Reviewer Organization | Asociación para la Investigación y Desarrollo Integral - AIDER |
| Response(s) - including general questions & comments | No, those mentioned are ok. |
| Verra Response | N/A |
| Aster Global Assessment | No response required |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | N/A |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 218 |
| Question | General |
| Section | 5.2 |
| Page (if relevant) | 5 |
| Reviewer Organization | Asociación para la Investigación y Desarrollo Integral - AIDER |
| Response(s) - including general questions & comments | Regarding the definition of limits, when referring to the specialization of the area outside the leakage belt (OLB), does it refer to what remains of the reference region, that is, the OLB would be within the RR or is it a different area? |

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| Verra Response | The definition of the area for OLB leakage is described at the end of Section 5.1.4. It is the entire country, which may include areas outside of the jurisdiction. |
| Aster Global Assessment | The end of Section 5.1.4 states "The spatial extent of land available for geographically mobile activity shifting will be defined by Verra following the criteria and procedures described in Section A2.1 of Appendix 2, and will be provided to the project proponent.". A2.1. states "The area of forest and non-forest land within the jurisdictional boundaries that is available for leakage due to geographically mobile actors is determined by the spatial distribution of the following factors". This implicitly defines the area outside of the OLB as areas outside of the PA and LB but within the jurisdiction. This conflicts with Verra's statement that areas outside the Lb and PA may be outside of the jurisdiction. |
| Aster Global Initial Findings | CL: Please provide explicit clarifying text in the module to define the OLB area. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The definition of the area for OLB leakage is described at the end of Section 5.1.4. It is the entire country, which may include areas outside of the jurisdiction in the case of subnational jurisdiction</p> <p>Explanation of original Verra response: Verra's original response was correct. However, an inconsistent citation was found in the methodology that referred to the 'jurisdiction' as opposed to 'the national extent'. The methodology has been updated accordingly.</p> <p>Response to additional points raised by Aster: Opening text of Appendix 2 clarified to state: "Verra will estimate emissions from deforestation outside the LB area using a single emission factor encompassing all lands available for conversion to agricultural land use within the national extent. This emission factor is approximated using area-weighted carbon stocks of all lands in the national extent, forested and non-forested, that are assessed to be all of the following:"</p> |
| Aster Global Findings Round 2 | The assessment team confirms that the additional clarification provided and the revised module text are sufficient to close the identified finding. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The definition of the area for OLB leakage is described at the end of AUDef Section 5.1.4. It is the entire country, which may include areas outside of the jurisdiction in the case of subnational jurisdiction |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 219 |
| Question | General |
| Section | 5.2.1 |
| Page (if relevant) | 6 |
| Reviewer Organization | Asociación para la Investigación y Desarrollo Integral - AIDER |

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| Response(s) - including general questions & comments | It is indicated that the leak belt cannot intersect with the area or leakage belt of another project. Would this indication be applied from the moment the module comes into force, that is for new projects or, also for already existing projects and would they have to recalculate areas? |
| Verra Response | Section 5.1.3 in the updated version of <i>AUDef</i> addresses this possibility |
| Aster Global Assessment | The assessment team deems this response as sufficiently addressing the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Section 5.1.3 in the updated version of <i>AUDef</i> addresses this possibility |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 220 |
| Question | General |
| Section | 5.2.1 |
| Page (if relevant) | 6 |
| Reviewer Organization | Asociación para la Investigación y Desarrollo Integral - AIDER |
| Response(s) - including general questions & comments | For the case of "Agents not geographically restricted: national limit of the country", the estimation of the displacement of land cover transitions towards the area outside the AUD Project area and leakage belt by agents not geographically restricted, should it be national or jurisdictional? Because, for example, Peru has been working on its reference level for the Amazon, not for the entire country. |
| Verra Response | The area for creating these maps is national, because the jurisdiction is solely an artefact of carbon accounting. Geographically mobile will not recognize or constrain themselves based on a Verra-defined jurisdiction. |
| Aster Global Assessment | The assessment team deems this response as sufficiently addressing the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The area for creating these maps is national, because the jurisdiction is solely an artefact of carbon accounting. Geographically mobile will not recognize or constrain themselves based on a Verra-defined jurisdiction. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 221 |
| Question | General |
| Section | 5.4.5 |

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| Page relevant (if) | 12 |
| Reviewer Organization | Asociación para la Investigación y Desarrollo Integral - AIDER |
| Response(s) - including general questions & comments | For the delimitation of the area of land available for leakage of activity change outside of AP and LB, should they be national or jurisdictional maps? If these maps do not exist, could use be made of the maps produced by local governments? If maps are to be created, who should map the proponent's proponent or someone designated by Verra? |
| Verra Response | Per AUDef Appendix 2, Verra will produce this data. Per Appendix 4, stakeholders can provide supplemental materials including any combination of: ancillary spatial data; National carbon stock map; Map of potentially arable land; Map of protection status; and Map of accessibility. |
| Aster Global Assessment | The assessment team deems this response as sufficiently addressing the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Per AUDef Appendix 2, Verra will produce this data. Per Appendix 4, stakeholders can provide supplemental materials including any combination of: ancillary spatial data; National carbon stock map; Map of potentially arable land; Map of protection status; and Map of accessibility. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 222 |
| Question | General |
| Section | 5.4.5.2 |
| Page relevant (if) | 14 |
| Reviewer Organization | Asociación para la Investigación y Desarrollo Integral - AIDER |
| Response(s) - including general questions & comments | In the item of physical accessibility, for the elaboration of the rasterized national map that indicates the accumulated time that an agent can cover, why not consider another type of transport, such as trimoviles for example, since there are zones in Peru, for example, where this vehicle is widely used to transport their products from the farms to the market/city. |
| Verra Response | This is a good suggestion, but it would be hard to develop universal criteria that work for all countries. Roads are considered access points in this analysis, so it is only walking time off-road that is used to determine the outer limit of accessibility. Because the map of available land for geographically mobile leakage is only used to develop emission factors, more sophisticated approaches are unlikely to have a large impact on project carbon accounting. |
| Aster Global Assessment | Revisions to the module have made this comment N/A |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra | This is a good suggestion, but it would be hard to develop universal criteria that work for all countries. Roads are considered access points in this analysis, so it is only |

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| Response October 2023 | walking time off-road that is used to determine the outer limit of accessibility. Because the map of available land for geographically mobile leakage is only used to develop emission factors, more sophisticated approaches are unlikely to have a large impact on project carbon accounting. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 223 |
| Question | General |
| Section | 5.4.6.1 |
| Page (if relevant) | 19 |
| Reviewer Organization | Asociación para la Investigación y Desarrollo Integral - AIDER |
| Response(s) - including general questions & comments | Is the module you refer to for obtaining the factors related to the extraction of timber products, is the VMD0005? |
| Verra Response | Yes. VMD0005 CP-W has been added as a parameter and to the Section 3 Sources. |
| Aster Global Assessment | The assessment team deems this response as sufficiently addressing the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Yes. VMD0005 CP-W has been added as a parameter and to the Section 3 Sources. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 224 |
| Question | 6 |
| Section | 5 |
| Page (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Response(s) - including general questions & comments | Yes, cultural differences may restrict migrant agents from moving into areas beyond their traditional tribal land. |
| Verra Response | No change requested |
| Aster Global Assessment | This comment does not need to be addressed. |
| Status | closed R1 |

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| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | N/A |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 225 |
| Question | General |
| Section | Module LK-UD-AS, Version 1.0 |
| Page (if relevant) | 11 |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Response(s) - including general questions & comments | The method for assessing whether geographically unconstrained agents (migrants) of deforestation are applicable presents a number of issues. Firstly, the metric of the proportion of immigrant people living inside the project or leakage area, as measured by sampling at least 1100 households, or 80% of all households, may be subject to a very low confidence if there are very few households in the project area or leakage belt. This is highly likely in our experience, as project areas are intact forest, and leakage belts are usually a mosaic of forest and agricultural land, which is often a fair distance from settlements. Secondly there are no clear guidelines on what represents a household (people often live in extended family groups of more than one house) or how to treat migration of individuals in and out of households. Also the metric for the proportion of people nationally migrating from rural to urban areas is thought to be very hard to calculate with any certainty measurement, and may vary widely between and within jurisdictions. |
| Verra Response | Additional guidance on the definition of the sampled population is provided. Namely, it is not just those residing within the PA and LB (which are by definition forested), but also those living within 2km of the PA and LB. Verra believes that it should be possible to provide substantiated estimates of this value based on existing datasets. |
| Aster Global Assessment | <p>The commenter suggests the method of assessing PropIMM is difficult because: 1) households are dispersed and distributed widely and 2) a 'household' may be a poor unit of representing migrant rates due to the structure of a household. Verra's response did not sufficiently address this concern and the assessment team is unable to locate where, in 5.3.3.4, the assessment team could find answers. The assessment team finds this comment as insightful; households could likely have only one member that engages in migrant patterns. Is the household considered migrant?</p> <p>Secondly, verra stated they may be able to provide a dataset of households. The assessment team asks for additional elaboration.</p> <p>Thirdly, section 5.3.3.4 recommends the CDM Guideline on sampling methods for surveys. This raises an interesting issue. As stated in the CDM Guideline, sometimes the number of households are not known in advance; therefore, one could use cluster sampling and select villages (primary sample units) and then sample households (secondary sample unit) within villages; from there one could estimate the number of households within 2 km of the PA. However, as written, 5.3.3.4 does not tacitly allow for estimations of households and, presumably, the onus is on PPs to demonstrate to</p> |

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| | VVBs that they have selected a sufficient sample size, i.e., the PP knows the population size. |
| Aster Global Initial Findings | CL: Please address the comment and provide clarity for the finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Additional guidance on the definition of the sampled population is provided in section 5.3.3.4. Namely, it is not just those residing within the PA and those within 2km of the PA. Verra believes that it should be possible to provide substantiated estimates of this value based on existing datasets.</p> <p>1) For areas with few households, the 'population' is the households residing in the study area, not the population of households in the jurisdiction. Sampling 80% of these estimated households would usually generate a very precise confidence interval of that sampled population.</p> <p>2) Verra cannot provide exhaustive guidance on what constitutes a household in all cultural contexts globally. Verra advises project proponents to describe their sampling methodology, including the consistent definition of household applied for their project. Additional text has been added to section 5.3.3.4 stating "Projects should describe how the definition of household applied in survey design is justified given local context, and demonstrate how it is consistently applied in survey administration. "</p> <p>3) PropUrban is no longer included in most recent draft of the module</p> <p>Explanation of original Verra Response: Original response incorrectly cited a study area of a 2km buffer around the PA and LB. The area is in fact described in the module as a 2km buffer of the PA. Removal of PropUrban clarified.</p> <p>Response to additional points raised by Aster:</p> <p>1) Verra accepts the complexity around definition of a household, but expects that project proponents are responsible for developing and applying a consistent definition for their projects. This clarification is added to section 5.3.3.4</p> <p>2) Verra has not stated that it can provide datasets of households, as Verra does not possess such datasets. Please, clarify if otherwise.</p> <p>3) The module section 5.3.3.4 has been updated to clarify that the number of households may be estimated prior to determining the sample size.</p> |
| Aster Global Findings Round 2 | <p>The assessment team reviewed Verra's responses and the updated module (v0.5) and noted the following:</p> <p>1. Verra has appropriately clarified in response to the public comment. This finding is closed.</p> <p>2. Verra has appropriately clarified and provided additional sufficient updates to the module to address this public comment. This finding is closed.</p> <p>3. Verra has appropriately updated the module to address this public comment. This finding is closed.</p> <p>In review of the v0.5 version of the module, Verra's Public comment response is no longer accurate as the methodology has been updated to and the PropIMM parameter is now required to be determined using sampling in the "Project Activities Region."</p> |
| Round 2 NCR/CL/OFI2 | CL: Please ensure that all comments to address public comments contain accurate information. |
| Round 2 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Additional guidance on the definition of the sampled population is provided in section 5.3.3.4. Namely, it is those living in the "Project Activities Region". Verra believes that it should be possible to provide substantiated estimates of this value based on existing datasets.</p> |

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| | <p>1) For areas with few households, the 'population' is the households residing in the Project Activities Region, not the population of households in the jurisdiction. Sampling 80% of these estimated households would usually generate a very precise confidence interval of that sampled population.</p> <p>2) Verra cannot provide exhaustive guidance on what constitutes a household in all cultural contexts globally. Verra advises project proponents to describe their sampling methodology, including the consistent definition of household applied for their project. Additional text has been added to section 5.3.3.4 stating "Projects should describe how the definition of household applied in survey design is justified given local context, and demonstrate how it is consistently applied in survey administration. "</p> <p>3) PropUrban is no longer included in most recent draft of the module</p> |
| Aster Global Findings Round 3 | The revised comment from the Methodology Developer is now up-to-date with the latest (v0.6) Module and addresses the original comment sufficiently. Closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>Additional guidance on the definition of the sampled population is provided in AUDef S section 5.3.34.4. Namely, it is those living in the "Project Activities Region". Verra believes that it should be possible to provide substantiated estimates of this value based on existing datasets.</p> <p>1) For areas with few households, the 'population' is the households residing in the Project Activities Region, not the population of households in the jurisdiction. Sampling 80% of these estimated households would usually generate a very precise confidence interval of that sampled population.</p> <p>2) Verra cannot provide exhaustive guidance on what constitutes a household in all cultural contexts globally. Verra advises project proponents to describe their sampling methodology, including the consistent definition of household applied for their project. Additional text has been added to AUDef S-section 5.3.3.4 stating "Projects should describe how the definition of household applied in survey design is justified given local context, and demonstrate how it is consistently applied in survey administration. "</p> <p>3) PropUrban is no longer included in most recent draft of the module</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 226 |
| Question | General |
| Section | Module LK-UD-AS, Version 1.0 |
| Page (if relevant) | 12 |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Response(s) - including general questions & comments | The method for delineating the area of land available for migrant leakage nationally involves an excessive amount of work. To produce the required maps across the entire country is surely in appropriate also, particularly for very large countries. We would imagine that it even migrant agents would not cause leakage in areas that are many 100s of kms from the jurisdiction. |

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| Verra Response | <p>1) Per Appendix 2, Verra will now estimate emissions from deforestation outside the LB using a single emission factor encompassing all lands available for conversion to agricultural land use. This factor will be provided to project proponents in the AD Baseline Allocation Report.</p> <p>2) Geographically mobile leakage does not model local agents migrating to other locations, but rather agent already living far from the project that might in the baseline move into the PA. In some countries, long distance migration is not uncommon.</p> |
| Aster Global Assessment | Revisions to this module have made this comment N/A; in addition, Verra has supplied a sufficiently thorough response |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>1) Per Appendix 2, Verra will now estimate emissions from deforestation outside the LB using a single emission factor encompassing all lands available for conversion to agricultural land use. This factor will be provided to project proponents in the AD Baseline Allocation Report.</p> <p>2) Geographically mobile leakage does not model local agents migrating to other locations, but rather agent already living far from the project that might in the baseline move into the PA. In some countries, long distance migration is not uncommon.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 227 |
| Question | General |
| Section | 5.2 |
| Page (if relevant) | 6 |
| Reviewer Organization | Biofilica Ambipar Environment; NBS Alliance; Carbonext |
| Response(s) - including general questions & comments | What about areas of multiple AUD project near each other? Wouldn't it difficult the LB allocation? |
| Proposed Change(s) | Give some possibilities of LB superposition between different AUD projects Consider the possibility that qualified project proponents create their own AD and that it's validated by a VVB, otherwise remove the need of VVB validation when a VERRA certified consultant has provided the AD |
| Verra Response | Section 5.4.4 has been rewritten as Appendix 2 Section 2.1. Section 5.1.3 in the updated version of <i>AUDef</i> addresses this possibility. |
| Aster Global Assessment | The assessment team notes this section has been substantially revised. Verra's response has adequately addressed the comment, referencing new procedures and clarifications. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra | Section 5.4.4 has been rewritten as Appendix 2 Section 2.1. Section 5.1.3 in the updated version of <i>AUDef</i> addresses this possibility. |

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| Response October 2023 | |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 228 |
| Question | General |
| Section | LK-UD-AS |
| Page (if relevant) | N/A |
| Reviewer Organization | Biofilica Ambipar Environment & NBS Brazil Alliance |
| Response(s) - including general questions & comments | It is difficult for projects to influence land-use decisions from non-geographically constrained agents who may have migrated into the belt for different reasons unrelated to the project. Why should this be considered project leakage? |
| Proposed Change(s) | Projects should not have ER deductions for actions outside and beyond their control. |
| Verra Response | It is conservative to account for leakage even in the case that the project might have had limited capacity to mitigate it. Leakage caused by non-geographically constrained agents is not feasible to monitor directly or directly attribute to a single project. Only through rough assumptions about national levels of migration and available of forested land can the relative impact of migrant leakage be approximated between countries. |
| Aster Global Assessment | Verra's response has adequately addressed the comment |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | It is conservative to account for leakage even in the case that the project might have had limited capacity to mitigate it. Leakage caused by non-geographically constrained agents is not feasible to monitor directly or directly attribute to a single project. Only through rough assumptions about national levels of migration and available of forested land can the relative impact of migrant leakage be approximated between countries. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 230 |
| Question | 6 |
| Section | 5 |
| Page (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Response(s) - including general questions & comments | Yes. In terms of displacement of activities, the current model is overly simplistic because it assumes a constant willingness, ability, and time investment to travel for deforestation activities. It also assumes a constant distance depending on the amount of time travelled, excluding critically important factors such as topography, vegetation density, land use, land cover, political boundaries/law enforcement, and alternative modes of transportation. The method required by Verra is complex yet provides no |

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| | source or reference as justification and therefore no means to evaluate its accuracy or validity of its assumptions. |
| Verra Response | The purpose of the mapping of land available for geographically mobile activity shifting leakage is solely to generate an estimate of the average carbon stocks of land outside the PA and LB where baseline geographically mobile deforestation agents might, in the project scenario, settle. This is expected to only capture the phenomenon that countries with highly forested and accessible unprotected lands are likely to have more geographically mobile leakage emissions than countries where forests are limited in area, highly protected, or inaccessible. There is diminishing gains for adding additional complexity to the model, as the basic trends comparing high to low forest-cover countries are likely to hold regardless of the approach to identifying areas available for geographically mobile leakage. |
| Aster Global Assessment | Verra's response has adequately addressed the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The purpose of the mapping of land available for geographically mobile activity shifting leakage is solely to generate an estimate of the average carbon stocks of land outside the PA and LB where baseline geographically mobile deforestation agents might, in the project scenario, settle. This is expected to only capture the phenomenon that countries with highly forested and accessible unprotected lands are likely to have more geographically mobile leakage emissions than countries where forests are limited in area, highly protected, or inaccessible. There is diminishing gains for adding additional complexity to the model, as the basic trends comparing high to low forest-cover countries are likely to hold regardless of the approach to identifying areas available for geographically mobile leakage. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 231 |
| Question | General |
| Section | 5 PROCEDURES |
| Page (if relevant) | 4 |
| Reviewer Organization | Conservation International (CI) |
| Response(s) - including general questions & comments | "Activities that land-cover-transition agents would implement inside the AUD ..." |
| Proposed Change(s) | This sentence is poorly worded and should be edited for clarity. |
| Verra Response | This section has been significantly revised so that this comment no longer applies |
| Aster Global Assessment | The assessment team confirms revisions have removed this phrasing |
| Status | closed R1 |
| Response Updated | no |

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| Since Finding Closed? | |
| Revised Verra Response October 2023 | This section has been significantly revised so that this comment no longer applies |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 232 |
| Question | General |
| Section | 5.1 General |
| Page (if relevant) | 9 |
| Reviewer Organization | Conservation International (CI) |
| Response(s) - including general questions & comments | The methodology mentions two classes of agents for leakage accounting: (1) Local deforestation and degradation agents, who are assumed to be displaced to the leakage belt, and (2) Non-geographically constrained Deforestation Agents, "who, under the baseline scenario would be expected to migrate to near the project area and cause deforestation within the project area". What about a third category: local, non-geographically-constrained agents who could be displaced <i>from</i> the project area <i>to</i> relatively far-away areas <i>beyond</i> the leakage belt. These would be people being driven from the project area to distant locations (distinct from those being driven to the project area, as described in group 2 above)? Based on the calculations in section 5.4, it sounds like the group 2 agents described here are, in practice, considered to be those driven away from the project area (as we suggest) rather than those driven to the project area. |
| Proposed Change(s) | Please review and clarify. The methodology is inconsistent throughout in the way it discusses the migrant agent population – sometimes talking about agents who migrated to the project area and in other cases talking about agents displaced from the project area; this must be thoroughly reviewed and clarified. In addition, it is not a safe assumption that those who migrated to the PA would necessarily be willing/able to migrate away from once displaced by project implementation. |
| Verra Response | Additional clarifications have been made (e.g., in Section 5.2.1) regarding the assumptions under the baseline and project for both geographically constrained and geographically mobile agents. Only two kinds of agents are considered, those who already live locally and shift their activities from one local area to another local area, and those who are living remotely at the start of the project and decide to relocate to areas outside of the PA+LB rather than migrating into the PA. |
| Aster Global Assessment | The assessment notes that additional clarifications have been made to address the original comment, e.g. in Table 1, • Migrates to an area other than the UDef PA or UDef LB and causes deforestation; and • Migrates to the UDef PA or UDef LB and causes deforestation. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Additional clarifications have been made (e.g., in AUDef Section 5.2.1) regarding the assumptions under the baseline and project for both geographically constrained and geographically mobile agents. Only two kinds of agents are considered, those who already live locally and shift their activities from one local area to another local area, |

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| | and those who are living remotely at the start of the project and decide to relocate to areas outside of the PA+LB rather than migrating into the PA. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 233 |
| Question | General |
| Section | 5.2 Definition of Boundaries |
| Page (if relevant) | 5 |
| Reviewer Organization | Conservation International (CI) |
| Response(s) - including general questions & comments | Geographically Constrained Agents - AUD Leakage Belt Based on experiences with projects under the existing methodologies, there are cases where there are no suitable forests directly surrounding an AUD project area (i.e., no forests with the necessary or desired characteristics for the agents of deforestation). They may not have the structural (size, shape, density) or composition (species) characteristics required by the agents and/or may not be suitable for the drivers motivating the agents. In landscapes under heavy deforestation pressure, this can be expected because the AUD project area is, in some cases, the last remaining forest area of its kind; in fact, this is sometimes the impetus for conservation efforts. In general, the effort to standardize leakage belts and replace Reference Areas with Jurisdictions may produce more consistency and ease of accounting, but it may do so at the cost of producing accounting with decreased accuracy and reliability. Existing methodologies have many criteria to define a leakage belt that is similar to the project area (e.g., topography, forest strata, demographics, agents and drivers); these criteria serve to create a defensible argument that agents could be reasonably expected to shift their activities from the project area to the leakage belt. Furthermore, the leakage belt, as defined with a fixed buffer distance under this new methodology, does not account for variability in mobility and willingness/necessity to travel for activities that cause deforestation/degradation. While these data are not always known with a high degree of certainty, the methodology should allow this data to be used when available (e.g., when agent mobility exceeds the 10-km maximum buffer distance). |
| Proposed Change(s) | Please review and modify the methodology appropriately. Alternative approaches allowed under the new methodology could draw from the existing methodologies, including similarity criteria. This module requires a contingency plan in case no suitable forest exists in the buffer distance Verra requires, otherwise projects will not be able to generate a leakage belt. |
| Verra Response | Projects are conservatively assumed to be responsible for all unplanned deforestation in excess of the baseline within the leakage belt. There are provisions to excluded areas not subject to the same drivers as the AUD PA (Appendix 1 Section A1.4.1 Step 1). |
| Aster Global Assessment | The commenter raises the concern that the project area may not have characteristically similar areas within the leakage belt. Verra notes it is conservative to include all areas, sans exclusions, within the leakage belt, even if they are not similar. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra | Projects are conservatively assumed to be responsible for all unplanned deforestation in excess of the baseline within the leakage belt. There are provisions to excluded |

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| Response October 2023 | areas not subject to the same drivers as the AUD PA (AUDef Appendix 1 Section A1.4.1 Step 1). |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 234 |
| Question | General |
| Section | 5.4. Emissions from Activity Shifting due to displacement of unplanned deforestation by geographically unconstrained agents (migrants) during the Monitoring Period |
| Page (if relevant) | 10 |
| Reviewer Organization | Conservation International (CI) |
| Response(s) - including general questions & comments | The general steps to estimating migrant leakage emissions - Regarding Step 3: What is the basis for this approach and calculation? What sources can Verra cite to support its assumptions? If a comprehensive literature review has been conducted, please provide references to support this approach. |
| Proposed Change(s) | Please clarify and provide sources, in-text references, and justification. |
| Verra Response | <p>The approach utilized is modeled on VMD0010-LK-ASU, specifically the passage "5.1.5.1 Define the total available national forest area (i.e., the total forest area in the country (TOTFOR)). This can be assessed with a coarse-scale imagery (e.g., using MODIS imagery or similar), or with official government statistics on forest area. The total national forest area should be reduced to just the area of forest within 5 km of a road or river that is suitable for conversion to agriculture or raising livestock. If boundaries are available, then area of protected forests (PROTFOR) and the area of managed forests⁴ (MANFOR) may be excluded from the total forest area calculated in this step."</p> <p>The only differences from the existing VMD0010 and Section 5.3.3.4 are: 1) accessibility is determined by walking time to nearest road rather than a cartesian 5km, to account for the effect of rugged terrain 2) the allowance of grades of protection status rather than a dichotomous protected/non-protected, and 3) more guidance for defining potentially arable land. Because the approach is an elaboration on an existing validated approach, no additional citations are provided.</p> |
| Aster Global Assessment | Revisions to 5.3.3.4 have made Verra's response outdated (e.g. the walking time is no longer a consideration) |
| Aster Global Initial Findings | CL: Please address the comment based on the most recent revision (and under the assumption subsequent revisions will not materially change this) |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The approach utilized is modeled on VMD0010-LK-ASU, specifically the passage "5.1.5.1 Define the total available national forest area (i.e., the total forest area in the country (TOTFOR)). This can be assessed with a coarse-scale imagery (e.g., using MODIS imagery or similar), or with official government statistics on forest area. The total national forest area should be reduced to just the area of forest within 5 km of a road or river that is suitable for conversion to agriculture or raising livestock. If boundaries are available, then area of protected forests (PROTFOR) and the area of managed forests⁴ (MANFOR) may be excluded from the total forest area calculated in this step."</p> <p>Explanation of original Verra Response: Walking time is no longer a factor - rather a fixed 10km buffer around roads is used.</p> |

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| | Response to additional points raised by Aster: N/A |
| Aster Global Findings Round 2 | The methodology developer has clarified that the approach taken is based on an existing approved module. The methodology developer provided a revised response clarifying how the comment is addressed based on the most recent revision of the module. The assessment team determined that this comment has been addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The approach utilized is modeled on VMD0010-LK-ASU, specifically the passage "5.1.5.1 Define the total available national forest area (i.e., the total forest area in the country (TOTFOR)). This can be assessed with a coarse-scale imagery (e.g., using MODIS imagery or similar), or with official government statistics on forest area. The total national forest area should be reduced to just the area of forest within 5 km of a road or river that is suitable for conversion to agriculture or raising livestock. If boundaries are available, then area of protected forests (PROTFOR) and the area of managed forests ⁴ (MANFOR) may be excluded from the total forest area calculated in this step." |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 235 |
| Question | General |
| Section | 5.4.2 Estimate the relative rate of migration to urban versus rural areas (PROP _{urban}) |
| Page (if relevant) | 11 |
| Reviewer Organization | Conservation International (CI) |
| Response(s) - including general questions & comments | It sounds like the proportion of migrants that settle in urban vs. rural areas is because activity-shifting leakage will not occur when there is urban resettlement, but this explanation is not explicitly stated in the text. |
| Proposed Change(s) | Please clarify and provide sources, in-text references, and justification. |
| Verra Response | Yes. VMD0005 CP-W has been added as a parameter and to the Section 3 Sources. |
| Aster Global Assessment | This response appears to be misplaced |
| Aster Global Initial Findings | CL: Please directly address the comment. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: The proportion of rural vs urban migration (PropUrban) is no longer estimated in a revised version since release for public comment. Explanation of original Verra Response: Original response was mistakenly made in reference to another comment, and should be disregarded |

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| | Response to additional points raised by Aster: n/a |
| Aster Global Findings Round 2 | The assessment team acknowledges that the response was misplaced. As the rural/urban proportion is no longer included, this comment is no longer relevant. Item addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The proportion of rural vs urban migration (PropUrban) is no longer estimated in a revised version since release for public comment. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 236 |
| Question | General |
| Section | 5.4.4 Determine if Activity Shifting to outside the leakage belt must be evaluated |
| Page (if relevant) | 12 |
| Reviewer Organization | Conservation International (CI) |
| Response(s) - including general questions & comments | If $(PROP_{IMM} * (1 - PROP_{urban}))$ is less than or equal to 0.1,... In other words, if $PROPrural < 0.1...$ This text is confusing and could be clearer. Use a verbal description to clarify. |
| Proposed Change(s) | Please edit text for clarity. |
| Verra Response | Section 5.4.4 has been rewritten as Appendix 2 Section 2.1. |
| Aster Global Assessment | This response appears to be misplaced |
| Aster Global Initial Findings | CL: Please directly address the comment. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: The proportion of rural vs urban migration (PropUrban) is no longer estimated in a revised version since release for public comment. Explanation of original Verra Response: Original response was misplaced and should be disregarded. Response to additional points raised by Aster: n/a |
| Aster Global Findings Round 2 | The assessment team acknowledges that the response was misplaced. As the rural/urban proportion is no longer included, this comment is no longer relevant. Item addressed. |
| Status | closed R2 |
| Response Updated | wording/typo updates |

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| Since Finding Closed? | |
| Revised Verra Response October 2023 | The proportion of rural vs urban migration (PropUrban) is no longer estimated in a revised version since release for public comment. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 237 |
| Question | General |
| Section | 5.4.5 Delineation of area of land available for activity shifting leakage outside of PA and LB |
| Page (if relevant) | 12 |
| Reviewer Organization | Conservation International (CI) |
| Response(s) - including general questions & comments | <p>Since these only need to be produced once by any PP, please confirm they will be publicly available along with a detailed report on how the methods used to develop them to ensure high standards of quality and transparency. Rather than requiring they be made available to Verra upon request, why not make them available to the public along with the PDD?</p> <p>On a separate note: Producing these maps is a large burden for the first PP, which may discourage PPs from being the first in the area. Maybe there's a way to distribute this burden?</p> |
| Proposed Change(s) | Please make the appropriate modifications and/or clarifications regarding these concerns. |
| Verra Response | Per Appendix 2, Verra will now estimate emissions from deforestation outside the LB using a single emission factor encompassing all lands available for conversion to agricultural land use. This factor will be provided to project proponents in the AD Baseline Allocation Report. |
| Aster Global Assessment Status | As stated by Verra, and affirmed by the assessment team's assessment of the current draft version, this procedure has materially changed. Thus the comment is N/A closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Per AUDef Appendix 2, Verra will now estimate emissions from deforestation outside the LB using a single emission factor encompassing all lands available for conversion to agricultural land use. This factor will be provided to project proponents in the AD Baseline Allocation Report. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 238 |
| Question | General |
| Section | 5.4.5.2 Physical Accessibility |
| Page (if relevant) | 14 |
| Reviewer Organization | Conservation International (CI) |

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| Response(s) - including general questions & comments | There seems to be a contradiction here. With regard to the risk mapping, Verra recognizes that road data can be difficult to obtain for certain countries & jurisdictions and is often out of date, this the Risk Mapping Tool excludes roads. However, for leakage, Verra suggests that road data must be used to estimate on-foot travel time and considers distance to permanent roads as the only factor. This decision does not account for many other factors that make land difficult or impossible to traverse (e.g., topography, wetlands, vegetation density) and does not consider the willingness or ability of agents to travel farther distances, create paths, or use other forms of mobility (e.g., waterways) to achieve such travel. As with the other assumptions in this methodology, we ask, “where is the evidence? Where are the sources cited for this 2-hour travel time standard?” Without sources or references, many of these assumptions could be considered arbitrary or baseless. |
| Proposed Change(s) | Please clarify and provide sources, in-text references, and justification. Consider modifying the methodology to be aligned with a review of scientific literature. |
| Verra Response | <p>We agree with your assessment that what is presented is a crude approach to approximating accessibility. However, the purpose of this element within the carbon accounting framework is merely to gauge the relative proportion of high and low biomass areas that would be likely to be deforested.</p> <p>The approach presented in AUDef is substantially more robust than the existing validated approach described in VMD0010. The risk map is specific to the jurisdiction, not the entire country, so cannot be repurposed to support the estimation of OLB leakage. The map of areas available for leakage will be updated every six years and will capture changes roads and protection status caused by geographically mobile agents themselves.</p> |
| Aster Global Assessment | As stated by Verra, and affirmed by the assessment team's assessment of the current draft version, this procedure has materially changed. Thus the comment is N/A |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>We agree with your assessment that what is presented is a crude approach to approximating accessibility. However, the purpose of this element within the carbon accounting framework is merely to gauge the relative proportion of high and low biomass areas that would be likely to be deforested.</p> <p>The approach presented in AUDef is substantially more robust than the existing validated approach described in VMD0010. The risk map is specific to the jurisdiction, not the entire country, so cannot be repurposed to support the estimation of OLB leakage. The map of areas available for leakage will be updated every six years and will capture changes roads and protection status caused by geographically mobile agents themselves.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 239 |
| Question | General |
| Section | 5.4.2 |
| Page (if relevant) | 11 |
| Reviewer Organization | Ecológica Assessoria |

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| Response(s) - including general questions & comments | Was not clear, but the recommendation is that a sampling of households living within the LB and the project area be carried out to determine the proportion of baseline agents in the population residing in the LB and project area equal to or greater than 5 years. Does the project proponent have to sample to be able to do this analysis and at what time should it be carried out? |
| Verra Response | The text has been clarified that all residents are part of the sampled population, but that PropIMM is derived from the proportion of that population that have both migrated recently AND engage in deforestation-causing livelihoods (e.g., Section 5.3.3.4) |
| Aster Global Assessment | It is clear that PROPIMM represents the proportion of households that have migrated recently and engage in deforestation in the text in 5.3.3.4. however, In Data and Parameters, PROPIMM is described as "Proportion of households living near the UDef PA and UDef LB that are recent migrants" and in Eq 54, "PROPIMM = Proportion of households living near the PA that are recent migrants (proportion)" |
| Aster Global Initial Findings | CL: Please consistently and clearly define and describe POPIMM |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The text has been clarified that all residents are part of the sampled population, but that PropIMM is derived from the proportion of that population that have both migrated recently AND engage in deforestation-causing livelihoods (e.g., Section 5.3.3.4). [NO CHANGE]</p> <p>Explanation of original Verra response: Discrepancies between the definitions in Section 5.3.3.4, equation 45, and the data and parameter table have been corrected.</p> |
| Aster Global Findings Round 2 | The updates to the module are sufficient to close the identified finding. This comment is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The text has been clarified that all residents are part of the sampled population, but that PropIMM is derived from the proportion of that population that have both migrated recently AND engage in deforestation-causing livelihoods (e.g., AUDef Section 5.3.34.4). |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 240 |
| Question | General |
| Section | 5.2.1 |
| Page (if relevant) | 6 |
| Reviewer Organization | Ecológica Assessoria |
| Response(s) - including general questions & comments | How will the displacement of land cover transitions to the area outside the Project AUD Leakage Area and Belt by non-geographically restricted agents at the national administrative boundary be estimated. |

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| Proposed Change(s) | In the case of Brazil, with large territorial extensions it should be done either through the state administrative division or depending on the state up to the municipal level. |
| Verra Response | Described in Section 5.3.3.4 |
| Aster Global Assessment | Verra responded that Section 5.3.4 describes how will the displacement of land cover transitions to the area outside the Project AUD Leakage Area and Belt by non-geographically restricted agents at the national administrative boundary be estimated. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Described in AUDef Section 5.3.34.4 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 241 |
| Question | General |
| Section | 5.4.6.1 |
| Page (if relevant) | 16 |
| Reviewer Organization | Ecológica Assessoria |
| Response(s) - including general questions & comments | It is unclear who should provide the National Carbon Stratification Map to identify the area of each national carbon stratum that falls under each protection category. |
| Verra Response | Per Appendix 2, Verra will now estimate emissions from deforestation outside the LB using a single emission factor encompassing all lands available for conversion to agricultural land use. This factor will be provided to project proponents in the AD Baseline Allocation Report. |
| Aster Global Assessment | As stated by Verra, and affirmed by the assessment team's assessment of the current draft version, this procedure has materially changed. Thus the comment is N/A |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Per AUDef Appendix 2, Verra will now estimate emissions from deforestation outside the LB using a single emission factor encompassing all lands available for conversion to agricultural land use. This factor will be provided to project proponents in the AD Baseline Allocation Report. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 242 |
| Question | General |
| Section | 4 |

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| Page (if relevant) | 4 |
| Reviewer Organization | Green Growth Consulting Firm |
| Response(s) - including general questions & comments | Applicability conditions is doubtful e.g., where it is applicable? |
| Proposed Change(s) | The applicability conditions should be directly relevant to field circumstances |
| Verra Response | Applicability conditions have been reviewed and confirmed. |
| Aster Global Assessment | The assessment team concurs that applicability conditions are listed in the Module. Given the broad/vagueness of the comment--and that the assessment team is evaluating the applicability conditions, this item is closed as it will be addressed by the assessment team. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Applicability conditions have been reviewed and confirmed. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 243 |
| Question | 6 |
| Section | 5 |
| Page (if relevant) | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Response(s) - including general questions & comments | The 'outside leakage belt' assessment is done on a national scale. The mobility of deforestation agents will be a significant factor but this doesn't seem to be accounted for. PROPIMM only accounts for people migrating into the area and doesn't account for WHERE they came from. Maybe all migrants came from the nearby areas, meaning assessing leakage at a national scale is unnecessary? This has significant implications in medium to large countries, particularly given the challenges associated with conducting the required assessment at a national level with data available. A suggested alternative could be, through the social surveys necessary to establish PROPIMM, to ask migrants in the Leakage Belt and Project Area where they migrated from. This would give an estimate of the maximum distance across which people migrate. This distance could be used as the width of a buffer around the LB within which PPs assess activity leakage outside of the LB. Sampling all people randomly and not only targeting deforestation agents would ensure this distance is conservative. |
| Verra Response | This is a good suggestion, but to follow the logic through, it would really require that the mapping of available land for migrant agents should be constrained by a distance from where they originate, not from the project area. Given they are likely all to be immigrating from different locations, these spatially mapped distance constraints would have to result in separate alternative-migration zones, that have to be weighted |

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| | among one another based on the proportion of respondents coming from those different locations. This would be a more perfect approach, but would substantially increase the complexity. Given the only function of the map of areas available for geographically mobile leakage is to assess an average emission factor for OLB leakage, rather than the quantity, the impact of a substantially more complex model is likely to be relatively small within the overall project ER accounting. |
| Aster Global Assessment | Given the objective of quantifying POPIMM the assessment team deems Verra's response as satisfactorily addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | This is a good suggestion, but to follow the logic through, it would really require that the mapping of available land for migrant agents should be constrained by a distance from where they originate, not from the project area. Given they are likely all to be immigrating from different locations, these spatially mapped distance constraints would have to result in separate alternative-migration zones, that have to be weighted among one another based on the proportion of respondents coming from those different locations. This would be a more perfect approach, but would substantially increase the complexity. Given the only function of the map of areas available for geographically mobile leakage is to assess an average emission factor for OLB leakage, rather than the quantity, the impact of a substantially more complex model is likely to be relatively small within the overall project ER accounting. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 244 |
| Question | General |
| Section | 5.4.1 |
| Page (if relevant) | 10 |
| Reviewer Organization | Silvestrum Climate Associates |
| Response(s) - including general questions & comments | Note the limitation of lands available for conversion in case of displacement from Project Areas with tidal wetland forest or peatland forest, in section 5.2.1.'. Unnecessarily unclear language. |
| Proposed Change(s) | As per the requirements of section 5.2.1, for tidal wetland or peatland forest projects, the area to be analyzed for activity displacement outside of the leakage belt can be limited to tidal wetlands or peatlands. |
| Verra Response | Suggested edit incorporated |
| Aster Global Assessment | The assessment team is unable to determine where--in the current version of the methodology--this revision has been made. |
| Aster Global Initial Findings | CL: Please clarify, in line with finding. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: This comment refers to mapping of the area eligible for outside-leakage-belt migration. The passage in question is no longer included in the methodology. Tidal wetlands are no longer included in this methodology. |

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| | <p>Explanation of original Verra Response: Tidal wetlands have been removed since drafting of the original response.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | The assessment team acknowledges that tidal wetlands are no longer included in the methodology and thus this comment is no longer relevant. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | This comment refers to mapping of the area eligible for outside-leakage-belt migration. The passage in question is no longer included in the methodology. Tidal wetlands are no longer included in this methodology. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 245 |
| Question | General |
| Section | 5.4.2 |
| Page (if relevant) | 11 |
| Reviewer Organization | Silvestrum Climate Associates |
| Response(s) - including general questions & comments | Why include a definition of PROPRES and an indication that it needs to be measured (even if it is implicit from PROPIMM) if it's not needed anywhere in the rest of the module? |
| Proposed Change(s) | Remove PROPRES and just say: Randomly sample households living within the Leakage Belt and within the Project Area to determine the proportion of the baseline agents within the population that has migrated into the area in the last 5 years (PROPIMM). |
| Verra Response | Agreed - Prop_RES removed to simplify. |
| Aster Global Assessment | The assessment team confirmed this revision has been made. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Agreed - Prop_RES removed to simplify. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |

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| Comment # | 246 |
| Question | General |
| Section | 5.4.6.2 |
| Page (if relevant) | 19 |
| Reviewer Organization | Silvestrum Climate Associates |
| Response(s) - including general questions & comments | Maybe missing a delta in equation 9 |
| Proposed Change(s) | Change the equation to include $\Delta C_{NonW-SOC_WP100,i}$, instead of $C_{Non-W-SOC_WP100,i}$ |
| Verra Response | This section has been significantly revised, so this comment no longer applies |
| Aster Global Assessment | Revisions to the module have made this comment N/A |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | This section has been significantly revised, so this comment no longer applies |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 247 |
| Question | General |
| Section | 5.4.7 |
| Page (if relevant) | 21 |
| Reviewer Organization | Silvestrum Climate Associates |
| Response(s) - including general questions & comments | In equation 12, PROPIMM defined as proportion of area deforested by immigrant agents, not proportion of people as per previous definition. |
| Proposed Change(s) | Refine the definition of PROPIMM to be consistent |
| Verra Response | Corrected to be proportion of households (Sections 5.3.3.4 & 6.2) |
| Aster Global Assessment | The assessment team confirmed this revision has been made. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |

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| Revised Verra Response October 2023 | Corrected to be proportion of households (AUDef Sections 5.3.34.4 & 6.2) |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 248 |
| Question | General |
| Section | 5.4.6.1 |
| Page (if relevant) | 17 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | the lack of available information would make it difficult to produce a continuous variable biomass map, in addition, the extra cost and time to produce a map with the required standards. |
| Verra Response | A continuous biomass map is not required. A simple forest-nonforest map with associated average carbon stocks may be used. Furthermore, there are several global carbon stock maps that can be used or adapted for this purpose. |
| Aster Global Assessment | The assessment team confirms the module does not require a map of biomass |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | A continuous biomass map is not required. A simple forest-nonforest map with associated average carbon stocks may be used. Furthermore, there are several global carbon stock maps that can be used or adapted for this purpose. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 249 |
| Question | General |
| Section | 5.1 |
| Page (if relevant) | 4 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | What if the project developer can demonstrate that part of the activity shifting in the leakage area is not associated with the project activities in the project area? |
| Verra Response | This will be addressed on a case-by-case basis. |
| Aster Global Assessment | The response is unclear; is there a section in the methodology or module that allows for a case-by-case determination? Is this a determination made via communication between PP and Verra? |

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| Aster Global Initial Findings | CL: Please clarify, in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Section 5.3.2.2 Step 1 "project sampling frame" describes instances where certain types of disturbances caused by drivers unrelated to project activities may be removed from project monitoring. All other disturbances observed in the monitoring period are to be accounted for. Activities removed from project accounting must also be removed from being factored into the baseline.</p> <p>Explanation of original Verra Response: Original response insufficiently addressed the treatment of certain unrelated drivers of deforestation. This is addressed in the latest version of the module, and a case-by-case assessment is not required.</p> <p>Response to additional points raised by Aster: n/a</p> |
| Aster Global Findings Round 2 | The methodology developer indicates that the treatment of certain unrelated drivers of deforestation is addressed in the latest version of the module; however no direct response as to how/where this is addressed is provided. |
| Round 2 NCR/CL/OFI2 | CL: Please clarify in line with the finding. |
| Round 2 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The module takes the conservative assumption that all monitored deforestation in the leakage belt in excess of the baseline is attributable to activity shifting leakage. Section 5.3.2.2 Step 1 "project sampling frame" describes instances where certain types of disturbances caused by drivers unrelated to project activities may be removed from project monitoring. All other disturbances observed in the monitoring period are to be accounted for. Activities removed from project accounting must also be removed from being factored into the baseline.</p> <p>Note to Aster: We added the first sentence to this response. Verra believes this clarification of where/how was already provided under "Revised Verra comment..." of Round 1 Response from Methodology Developer.</p> <p>The passage referred to in this section, under heading "Stratification" is copied here: <i>"Each forest stratum used by the project for project emissions accounting must also be used as a sampling stratum. Note that Sections 5.3.2.3 and refer to cases where new forest strata may be defined within the UDef PA due to degradation events that occurred after the beginning of the monitored period. Natural (but not human-caused) large scale degradation may be similarly delineated in the UDef LB. Such forest strata must be incorporated in the sampling design for monitoring deforestation area, but the strata are omitted from emissions accounting until revised carbon stocks can be estimated."</i></p> |
| Status | closed R3 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The module takes the conservative assumption that all monitored deforestation in the leakage belt in excess of the baseline is attributable to activity shifting leakage. AUDef Section 5.3.23.2 Step 1 "project sampling frame" describes instances where certain types of disturbances caused by drivers unrelated to project activities may be removed |

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| | from project monitoring. All other disturbances observed in the monitoring period are to be accounted for. Activities removed from project accounting must also be removed from being factored into the baseline. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 250 |
| Question | General |
| Section | 5.2.1 |
| Page (if relevant) | 6 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | This paragraph does not explain why using 4 km as the distance between boundaries of forest patches for the procedure. As stated earlier in the module, if 10 km is the maximum buffer for the leakage belt, in some cases that distance can range between 4 to 10 km and the patches will be involved in the same leakage belt. |
| Verra Response | 4 km has been retained (Appendix 1 Section A1.2.2) as a practical threshold. However, further actions have been detailed in Section 5.1.3 of the updated version of the module to properly account for (and discount) potential overlaps between project areas and leakage belts of other VCS AFOLU registered and active projects. |
| Aster Global Assessment | The assessment team confirms 4 km has been retained and that revisions to 5.1.3 can account for overlaps. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | 4 km has been retained (AUDef Appendix 1 Section A1.2.2) as a practical threshold. However, further actions have been detailed in Section 5.1.3 of the updated version of the module to properly account for (and discount) potential overlaps between project areas and leakage belts of other VCS AFOLU registered and active projects. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 251 |
| Question | General |
| Section | 5.2.1 |
| Page (if relevant) | 6 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | In the case of projects from different project developers, is this subdivision a result of an agreement between them? Why would a project proponent modify its leakage belt favoring a new project in the region? |
| Verra Response | Section 5.1.3 in the updated version of <i>AUDef</i> addresses this situation |
| Aster Global Assessment | The assessment team confirms this referenced section in the revised draft addresses the comment. |
| Status | closed R1 |

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| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Section 5.1.3 in the updated version of AUDef addresses this situation |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 252 |
| Question | General |
| Section | 5.2.1 |
| Page (if relevant) | 6 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | "made available publicly available" |
| Verra Response | Sentence removed |
| Aster Global Assessment | Assessment team confirms that this has been corrected |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Sentence removed |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 253 |
| Question | General |
| Section | 5.3.1 |
| Page (if relevant) | 7 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | "estimated f following" |
| Proposed Change(s) | "estimated following" |

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| Verra Response | No longer relevant |
| Aster Global Assessment | Assessment team confirms that this is no longer relevant. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | No longer relevant |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 254 |
| Question | General |
| Section | 5.3.1 |
| Page (if relevant) | 7 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | "The difference in carbon stocks changes" |
| Proposed Change(s) | "The difference in carbon stocks" or "The carbon stocks changes" |
| Verra Response | Corrected (Section 5.3.3.3) |
| Aster Global Assessment | The assessment team confirms this revision has been made |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Corrected (AUDef Section 5.3.3.3) |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 255 |
| Question | General |
| Section | 5.3.1 |
| Page (if relevant) | 7 |
| Reviewer Organization | South Pole |

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| Response(s) - including general questions & comments | Δ CLK-ASU-LB (as in the description) or Δ CLK-net-LB (as in the equation)? Please, consider this. |
| Verra Response | corrected to Δ CLK-net-LB (Section 5.3.3.3) |
| Aster Global Assessment | The assessment team confirms this revision has been made |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | corrected to Δ CLK-net-LB,t (AUDef Section 5.3.3.3) |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 256 |
| Question | General |
| Section | 5.3.1 |
| Page (if relevant) | 7 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | "carbon forest carbon" |
| Proposed Change(s) | "forest carbon" |
| Verra Response | No longer relevant |
| Aster Global Assessment | Assessment team confirms that this is no longer relevant. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | 4 km has been retained (AUDef Appendix 1 Section A1.2.2) as a practical threshold. However, further actions have been detailed in Section 5.1.3 of the updated version of the module to properly account for (and discount) potential overlaps between project areas and leakage belts of other VCS AFOLU registered and active projects. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 257 |
| Question | General |

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| Section | 5.4.2 |
| Page (if relevant) | 11 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | According to "The minimum sample size of respondents shall be at least 1100 households ..." |
| Proposed Change(s) | The following sentence should be "If the total number of households is less than 1100, then the sample size must be 100% of the households" |
| Verra Response | Corrected. It will typically not be possible to sample 100% of households. It now reads that if the number of households is less than 250, than a minimum of 80% must be sampled (Section 5.3.3.4). |
| Aster Global Assessment | Verra states "It now reads that if the number of households is less than 250, than a minimum of 80% must be sampled (Section 5.3.3.4)". However, the section states "The minimum sample size must be at least 200 households. Where the total number of households is less than 250, the sample size must be at least 80 percent of the households. ". This is clunky wording and less clear than Verra's response here. |
| Aster Global Initial Findings | CL: Please revise this statement to provide clarity |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The text has been corrected and clarified; current text now reads "The minimum sample size must be at least 200 households. Where the total number of households is estimated to be less than 250, the minimum sample size may be reduced to 80 percent of the estimated number of households households."</p> <p>Explanation of original Verra Response: Text has been further modified to reflect the fact that 80% is of the estimated number of households, as the exact number of households will likely not be known.</p> <p>Response to additional points raised by Aster: Verra believes the new wording is now more clear.</p> |
| Aster Global Findings Round 2 | The assessment team confirms this statement has been revised in the updated AUDef module and is now more clear. Item addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The text has been corrected and clarified; current text now reads "The minimum sample size must be at least 200 households. Where the total number of households is estimated to be less than 250, the minimum sample size may be reduced to 80 percent of the estimated number of households households." |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 258 |
| Question | General |
| Section | 5.4.2 |

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| Page relevant) (if | 11 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | However, 1100 respondents could be a huge sample size, especially in remote areas. Why do not consider other options available in the same supporting reference (Israel, 2012, Determining Sample Size) if they are statistically significant? |
| Verra Response | Project proponents should have the expectation of being able to access all areas of the proposed project. Verra is open to alternate approaches to define sample size in future revisions, but would ask the practitioner community to provide recommended alternative text. |
| Aster Global Assessment | Given the difficulty in conducting household surveys with 90% response rates, the assessment team asks Verra if they have considered other sources, e.g. govt statistics which may be defined at similar, albeit different, delineations of area |
| Aster Global Initial Findings | CL: Please clarify, in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The current text reads "The minimum sample size must be at least 200 households. Where the total number of households is estimated to be less than 250, the minimum sample size may be reduced to 80 percent of the estimated number of households." Verra is not including in the methodology a standard alternative approach for establishing PropIMM. Alternative sources are expected to be too varied and difficult for a VVB to assess their relevance for the project area. For this reason Verra insists on direct sampling of the immediate landscape of the project. Every single element of a module is subject to methodological deviations, and PP's are always welcome to submit requests for deviations if circumstances do not allow adhering to the prescribed approach. However, there is no guarantee such a request for a deviation would be accepted by Verra.</p> <p>Explanation of original Verra Response: Text has been further modified to reflect the fact that 80% is of the estimated number of households where the estimated number of households is 250 or less, as the exact number of households will likely not be known.</p> <p>Response to additional points raised by Aster: Verra believes the new wording is now more clear.</p> |
| Aster Global Findings Round 2 | The methodology developer has indicated that a standard alternative approach will not be included given the varied approaches/sources that can be used. However, the methodology developer clarifies that use alternative data/methods may be requested as a methodology deviation. The assessment team determined this is a reasonable response. Item addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The current text reads "The minimum sample size must be at least 200 households. Where the total number of households is estimated to be less than 250, the minimum sample size may be reduced to 80 percent of the estimated number of households." Verra is not including in the methodology a standard alternative approach for establishing PropIMM. |

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| | Alternative sources are expected to be too varied and difficult for a VVB to assess their relevance for the project area. For this reason Verra insists on direct sampling of the immediate landscape of the project. Every single element of a module is subject to methodological deviations, and PP's are always welcome to submit requests for deviations if circumstances do not allow adhering to the prescribed approach. However, there is no guarantee such a request for a deviation would be accepted by Verra. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 259 |
| Question | General |
| Section | 5.4.3 |
| Page (if relevant) | 11 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | "prior to the end of the project activity" |
| Proposed Change(s) | "prior to the beginning of the project activity" |
| Verra Response | Corrected |
| Aster Global Assessment | The assessment team is unable to locate this correction. |
| Aster Global Initial Findings | CL: Please identify the section where this revision was made |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The phrase "prior to the end of the project activity" no longer exists in the AUDef module.</p> <p>Explanation of original Verra Response: The correction was undertaken by removing the passage.</p> <p>Response to additional points raised by Aster: The passage no longer exists.</p> |
| Aster Global Findings Round 2 | As this passage no longer exists in the revised AUDef module, this comment is no longer relevant. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The phrase "prior to the end of the project activity" no longer exists in the AUDef module. |
| Aster Global Assessment | The assessment team confirmed that no changes were made to the initial response. No further review is required. |

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| of Revised Response | |
| Comment # | 260 |
| Question | General |
| Section | 5.4.5 |
| Page (if relevant) | 12 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | In the case of projects from different project developers, the use of existing maps, instead of generate new versions, is a result of an agreement between the developers? Why would a project proponent share those datasets favoring a new project in the region? |
| Verra Response | Jurisdictional and national maps are developed by the 3rd party data service provider and shared to project proponents. This is now clarified in Appendix 3. |
| Aster Global Assessment | The assessment team deems this comment is sufficiently addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Jurisdictional and national maps are developed by a the 3rd party data service provider and shared to project proponents. This is now clarified in AUDef Appendix 3. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 261 |
| Question | General |
| Section | 5.4.5.1 |
| Page (if relevant) | 13 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | This paragraph can be a kind of confusing. Peatlands or tidal wetlands must be excluded if it can be demonstrated that they are not suitable for baseline deforestation activities, or A) ... or B) ... But, what if they are suitable for baseline deforestation activities but they are not subject of drainage? Or vice versa? And about B), why is that option a reason for the exclusion? Because baseline deforestation agents can migrate from one tidal wetland to other one, and this can represent a migrant leakage. |
| Verra Response | Tidal wetlands are now excluded completely from the methodology. This section has now been significantly revised (see Appendix 2 Section A2.1 Step 1). |
| Aster Global Assessment | The assessment team notes that tidal wetlands are temporally included in M0184, Methodology for reducing emissions from deforestation and degradation 2023.04.03. |
| Aster Global Initial Findings | CL: Please clarify if tidal wetlands are included. |

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| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The passage in question is no longer included in the module.</p> <p>Explanation of original Verra Response: Verra incorrectly stated 'methodology' when it meant to refer to the AUDef module.</p> <p>Response to additional points raised by Aster: This comment refers to mapping of the area eligible for outside-leakage-belt migration. It is not about whether or not tidal wetlands are included. The response has been updated to pertain specifically to the OLB development in Appendix 2.</p> |
| Aster Global Findings Round 2 | The additional context provided in the revised public comment is sufficient to close the identified finding. This item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The passage in question is no longer included in the module. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 262 |
| Question | General |
| Section | 5.4.6.1 |
| Page (if relevant) | 17 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | In the numerator, why do p range from 1 to <5? It should be similar to its range in the denominator. |
| Verra Response | This section (now Appendix 2) has significantly changed. |
| Aster Global Assessment | The assessment team notes the revisions have changed significantly enough as to make this comment outdated. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | This section (now AUDef Appendix 2) has significantly changed. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |

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| Comment # | 263 |
| Question | General |
| Section | 5.4.6.1 |
| Page (if relevant) | 17 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | Why must our verified datasets be available to other AUD projects operating in the jurisdiction if these datasets correspond to our development, which has generated project costs? |
| Verra Response | Per Appendix 2, Verra will now estimate emissions from deforestation outside the LB using a single emission factor encompassing all lands available for conversion to agricultural land use. This factor will be provided to project proponents in the AD Baseline Allocation Report. |
| Aster Global Assessment | Substantial revisions to the module have made this N/A. Verra's response sufficiently captures the new process. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Per AUDef Appendix 2, Verra will now estimate emissions from deforestation outside the LB using a single emission factor encompassing all lands available for conversion to agricultural land use. This factor will be provided to project proponents in the AD Baseline Allocation Report. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 264 |
| Question | General |
| Section | 5.4.6.2 |
| Page (if relevant) | 19 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | These lines should be after the title 5.4.6.2 |
| Verra Response | This section has been significantly revised, so this comment no longer applies |
| Aster Global Assessment | The assessment team notes the revisions have changed significantly enough as to make this comment outdated. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra | This section has been significantly revised, so this comment no longer applies |

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| Response October 2023 | |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 265 |
| Question | General |
| Section | 5.4.6.3 |
| Page (if relevant) | 20 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | These lines should be after the title 5.4.6.3 |
| Verra Response | This section has been significantly revised, so this comment no longer applies |
| Aster Global Assessment | The assessment team notes the revisions have changed significantly enough as to make this comment outdated. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | This section has been significantly revised, so this comment no longer applies |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 266 |
| Question | General |
| Section | 5.4.8 |
| Page (if relevant) | 23 |
| Reviewer Organization | South Pole |
| Response(s) - including general questions & comments | The variable CWP100,OLB,t does not appear in the previous equation. Please, check the correspondence of the variables between the equation and the description. |
| Verra Response | Thank you for this suggestion |
| Aster Global Assessment | The assessment team deems this comment is sufficiently addressed. |
| Status | closed R1 |
| Response Updated | no |

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| Since Finding Closed? | |
| Revised Verra Response October 2023 | Thank you for this suggestion |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 267 |
| Question | General |
| Section | 5.2.1 |
| Page (if relevant) | 6 |
| Reviewer Organization | Systemica |
| Response(s) - including general questions & comments | There is some concern regarding the topic: "1. Wherever the LB from an AUD project intersects with the PA of a different AUD project, this intersecting area shall be excluded from the LB." There are many certified AUD projects without LB information available in the Verra Registry (e.g. Florestal Santa Maria Project, Agrocortex REDD Project, Fortaleza Ituxi REDD Project, etc.). How will Verra ensure that all projects make their respective LB and PA available? |
| Proposed Change(s) | As a suggestion, Verra could be centralized LB and PA area data on a single file to facilitate access. Or alternatively, it is check the missing data for each project and make its available. |
| Verra Response | Verra will improve its data management practices to ensure that project proponents and data service providers have access to the spatial boundary definitions required to make the assessments of overlapping leakage belts. To begin, this will only be possible for projects using AUDef. |
| Aster Global Assessment | The assessment team deems this comment is sufficiently addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Verra will improve its data management practices to ensure that project proponents and data service providers have access to the spatial boundary definitions required to make the assessments of overlapping leakage belts. To begin, this will only be possible for projects using AUDef. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 268 |
| Question | General |
| Section | 5.4.2 |
| Page (if relevant) | 11 |
| Reviewer Organization | Systemica |
| Response(s) - including general | As project developer company in the large areas in regions of Brazil, there is impracticability regarding random sampling households in some projects due to long-distance and the lack of accessing these households. Amazon's population has an |

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| questions & comments | <p>insufficient supply of public services, such as infrastructure, communication, and transport difficulties. Furthermore, there is a heterogeneous and multifaceted socio-environmental scenario where populous modern urban centers, relatively isolated small towns, traditional populations of different types dispersed in remote rural areas, and practically impregnable territories coexist (Garnelo L. 2019).</p> <p>REFERENCES Garnelo, L. (2019). Specificities and challenges of public health policies in the Brazilian Amazon. <i>Cadernos de Saúde Pública</i>, 35, e00220519.</p> |
| Proposed Change(s) | <p>As a suggestion, VERRA can be propose the alternative form to estimation of the proportion immigrant and resident land cover transition agents in the baseline (PROPIMM). In the analysis of leakage outside the leakage belt, for calculating PROPIMM, the participatory rural appraisal (PRA) approach can be replaced by local official data (e.g. available from IBGE for regions from Brazil). There data have a precise approach for accounting population locally, which allow calculating the number of immigrants in the local. The number of immigrants can be estimated assuming that the annual growth in the population, excluding the difference between births and deaths, that reflects the exact number of immigrants according to official available data. So, according to the number of immigrants, the proportion of deforestation can be attributed to immigrant agents.</p> |
| Verra Response | <p>Verra agrees that there might be improved approaches to estimated PropIMM given certain data availability and technical capacity of analysts. Verra is not in a position to write guidance for alternative approaches. Project proponents may opt to propose deviations specific to their projects for any calculation, as described in the VCS Standard. If projects do not wish to calculate PropIMM, they may conservatively assume it is 1.0.</p> |
| Aster Global Assessment | <p>The assessment team has written another finding regarding the difficulty in achieving a high response rate (and confidently assessing the number of households within 2 km of the project area as well). That concern is addressed in that respective finding. Verra stated projects may conservatively set PropIMM to 1. However, it is not clear where in 5.3 this is stated.</p> |
| Aster Global Initial Findings | <p>CL: Please clarify in line with finding</p> |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The current text reads "The minimum sample size must be at least 200 households. Where the total number of households is estimated to be less than 250, the minimum sample size may be reduced to 80 percent of the estimated number of households households."</p> <p>Verra is not including in the methodology a standard alternative approach for establishing PropIMM. Alternative sources are expected to be too varried and difficult for a VVB to assess their relevance for the project area. For this reason Verra insists on direct sampling of the immediate landscape of the project. Every single element of a module is subject to methodological deviations, and PP's are always welcome to submit requests for deviations if circumstances do not allow adhering to the prescribed approach. However, there is no guarantee such a request for a deviation would be accepted by Verra.</p> <p>Explanation of original Verra Response: Original response was correct, but module has been clarified that 1.0 may always be used as a conservative default for PropIMM (see 5.3.3.4)</p> <p>Response to additional points raised by Aster: High response rate (80%) is only needed for projects with extremely low populations, of 250 households or less. Verra believes that it is a reasonable expectation that projects put forward the effort to contact 80% of households in such situations. For the</p> |

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| | much more common situation of larger populations around a project, the response rate requirement is much lower, as the total response needed is at least 200. |
| Aster Global Findings Round 2 | The methodology developer has indicated that they believe the sampling requirements identified are feasible. As such a standardized alternative for determining PROPIMM will not be included, given the varied approaches, though project proponent's may request a methodology deviation. The language that projects may conservatively set PROPIMM to 1 is now included. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | See comment #258 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 269 |
| Question | General |
| Section | 5.4.3 |
| Page (if relevant) | 11 |
| Reviewer Organization | Systemiq |
| Response(s) - including general questions & comments | The approach to develop estimates of rural to urban migration proportion remains unclear. |
| Proposed Change(s) | We recommend that further guidance be included in the module and/or that the development of this factor be undertaken by a 3rd party recruited by Verra. |
| Verra Response | PROPrural has been eliminated from the document. |
| Aster Global Assessment | The assessment team confirmed PROPrural is removed from the revision. This finding is closed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | PropRURAL has been eliminated from the document. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 270 |
| Question | General |
| Section | N/A |

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| Page (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Response(s) - including general questions & comments | Need further clarification on what data are acceptable for the urban to rural proportion |
| Proposed Change(s) | |
| Verra Response | Verra is open to recommendations from the project development community on more specific guidelines that can be provided for this section. This is a new parameter for VCS so there is not an existing approach to draw from. |
| Aster Global Assessment | Given the revisions in the Module to this section, it is unclear what parameter Verra is referring to |
| Aster Global Initial Findings | CL: Please clarify in line with finding |
| Round 1 Response from Methodology Developer | The rural:urban proportion parameter is no longer included in the latest version of the AUDef Module |
| Aster Global Findings Round 2 | As the rural/urban proportion is no longer included, this comment is no longer relevant. Item addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The rural:urban proportion parameter is no longer included in the latest version of the AUDef Module |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 271 |
| Question | General |
| Section | N/A |
| Page (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Response(s) - including general questions & comments | The leakage requirements to define a leakage belt and other leakage boundaries seem overly onerous for projects. Projects may be held responsible for changes in deforestation that are not truly a result of project leakage. Projects often will have no control over these activities or be able to mitigate them. The hope that projects will collaborate together to assess and monitor leakage seems unlikely. |
| Proposed Change(s) | Further rules would seem necessary for projects where there is overlap of leakage belts. Onus should be on third parties to generate outside leakage belt emissions to avoid PD using conflicting datasets. |

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| Verra Response | Section 5.1.3 in the updated version of <i>AUDef</i> provides clearer guidance on overlapping leakage belts |
| Aster Global Assessment | The assessment team deems this response to adequately address the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Section 5.1.3 in the updated version of <i>AUDef</i> provides clearer guidance on overlapping leakage belts |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 272 |
| Question | 6 |
| Section | 5 |
| Page (if relevant) | N/A |
| Reviewer Organization | Value for Nature Ltd. |
| Response(s) - including general questions & comments | <p>"There are two main problems with leakage. First, it cannot be quantified ex-ante through a risk assessment of its causes. The risk whether a baseline land use is displaced depends on many factors, most of which can only be guessed or subjectively assessed. So, it cannot be quantified by assessing these factors separately in a standardized approach. At best, a risk category (high, medium, low) could be assigned to each project (see below). Second, it cannot be observed ex-post and convincingly attributed to the project. The approach taken in various AUDD methodologies and in the proposed leakage module is to attribute any rise in deforestation relative to the baseline within a leakage belt to the project as leakage. We know that deforestation dynamics are not linear and fluctuate over time. This may depend on government policies, market dynamics, demographics, 'tipping points' where forces that kept deforestation at bay suddenly collapse, changes in community management, etc., etc. So to attribute any observed increase in deforestation relative to an already highly hypothetical baseline scenario as leakage to a specific project is entirely wishful thinking. The same applies to the assumption that leakage is zero if no increase is observed. We simply cannot identify it, let alone attribute it. There is no need for this contrived attempt to quantify leakage. It is extra work for project proponents and VVBs, which raises transaction costs. It creates uncertainty for proponents, investors and buyers, because they are at the mercy of vagaries in deforestation dynamics. It also leaves the projects, their buyers, and Verra open to criticism for using a highly uncertain approach. The common approach applied in carbon quantification in the face of uncertainty is to be conservative. It would be preferable for all parties involved if a standard discount rate would be applied for leakage risk. This rate could be set such that it is defensibly conservative. Proponents would prefer this certainty over the faff and uncertainty of the monitored leakage belt approach. They already apply a discount in their feasibility studies anyway. A blanket 15-25% leakage discount should be acceptable, depending on the risk category the project is assigned to. Simple leakage risk categories can be devised, e.g. high, medium, low, based for example on whether baseline agents are project participants, whether they have</p> |

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| | access to other forest lands, whether the opportunity cost of the baseline land use is significantly higher than the carbon project, whether the motivations to agree to the REDD project are primarily monetary or not. The design of the project should seek to minimize leakage risk. An assessment tool can be designed for project proponents and VVBs to apply for the determination of the risk category and resulting leakage discount factor. " |
| Verra Response | Verra has made the decision to retain the approach currently employed in several validated VCS AUD methodologies. The idea of a simplified approach does have many advantages as provided in the comment. The major changes that Verra has focused on in the new methodologies are related to jurisdictional activity data and risk mapping. One principle is that Verra would like to ensure that projects are oriented towards leakage outcomes and not process or box-checking that may not actually address leakage. |
| Aster Global Assessment | The commenter suggested using a default leakage rate given that the module's process of determining leakage has many inbuilt assumptions. Verra has acknowledged the benefit of this proposed approach but, declined to make substantial changes to determining leakage. Verra defended this by 1) pointing to precedent and 2) stating that having a variable leakage may actually incentivize project proponents to ensure leakage is actually reduced. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Verra has made the decision to retain the approach currently employed in several validated VCS AUD methodologies. The idea of a simplified approach does have many advantages, as identified as provided in the comment. The major changes that Verra has focused on in the new methodologies are related to jurisdictional activity data and risk mapping. One principle is that Verra would like to ensure that projects are oriented towards leakage outcomes and not process or box-checking that may not actually address leakage. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 273 |
| Question | General |
| Section | 5.4 |
| Page (if relevant) | N/A |
| Reviewer Organization | Volkswagen-Climate Partner |
| Response(s) - including general questions & comments | It is almost impossible for projects to influence the land-use decision making of non-geographically constrained agents who migrate into the OLB area for reasons not related to the project at all. We are not clear why this would be considered leakage from the project if there is no direct relationship with project activities? |
| Proposed Change(s) | In cases where it can be demonstrated that the migration to the OLB areas is not related to the AUD project, or where the agents in the AUD project have no access to the OLB area, this leakage portion should not be accounted for. Rationale: Projects do not have to face ER deductions for actions for which they do not have any control. |
| Verra Response | Projects customarily face ER deductions for actions they do not control, including reversals due to natural disasters. An emission reduction is an approximation of an |

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| | atmospheric benefit and it would not show environmental integrity to not acknowledge losses over which project proponents do not have control. |
| Aster Global Assessment | The assessment team believes Verra's response, pointing to disturbances, is not a direct response. This is because instances where disturbances result in material reversal of emission reductions are real and occur within the project area i.e. result in actual changes in carbon stocks directly attributed to the project, whereas the commenter made the point that migrant deforestation agents may not result in 'real' loss of carbon stocks, attributable to the project. |
| Aster Global Initial Findings | CL: Please expound on the rationale for having the project proponent account for migration in the OLB outside their control. |
| Round 1 Response from Methodology Developer | The updated version of the AUDef module provides better guidance on how to assess and conservatively account for activity shifting by geographically mobile agents of deforestation. |
| Aster Global Findings Round 2 | The methodology developer indicates the updated version of the AUDef module provides better guidance on how to assess/account for activity shifting by geographically mobile agents. However, no direct response is provided. |
| Round 2 NCR/CL/OFI2 | CL: Please provide a direct response on how/where the updates to the AUDef module address the comment. |
| Round 2 Response from Methodology Developer | Revised Verra response to original comment: The occurrence of leakage by mobile agents is well established and documented and it can rarely be fully excluded. Therefore, the various sources of leakage potentially affecting a given project have to be taken into account in order to attain a conservative account of the project's emissions reductions. Recommendations to manage leakage in general include (1) consideration and reduction of potential leakage in the project and program design, (2) monitoring and accounting of leakage in a sufficiently large monitoring area, and (3) discounting of any leakage from GHG benefits claimed. This is the spirit of this requirement. |
| Aster Global Findings Round 3 | The Assessment Team judges the response to the original comment as sufficient; the original comment questioned whether leakage ought to be considered where no direct relationship with project activities has been identified. The Assessment Team notes that the VCS Methodology Requirements has means to account for this (e.g., 3.7.16(1)(b)) and has, in the review by the Assessment Team, assessed the Module and Methodology in context of this. |
| Status | closed R3 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The occurrence of leakage by mobile agents is well established and documented and it can rarely be fully excluded. Therefore, the various sources of leakage potentially affecting a given project have to be taken into account in order to attain a conservative account of the project's emissions reductions. Recommendations to manage leakage in general include (1) consideration and reduction of potential leakage in the project and program design, (2) monitoring and accounting of leakage in a sufficiently large monitoring area, and (3) discounting of any leakage from GHG benefits claimed. This is the spirit of this requirement. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 274 |

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| Question | General |
| Section | N/A |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Asociación para la Investigación y Desarrollo Integral - AIDER |
| Reviewer Country | Perú |
| Response(s) - including general questions & comments | The discounts made in the baseline will be used in the estimates of emissions from deforestation, that is, will the same discount value be used? |
| Verra Response | Biomass stocks and thus emission factors are set for the baseline validity period and thus the same emission factors are used during monitoring. |
| Aster Global Assessment | Verra's response adequately addresses the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Biomass stocks and thus emission factors are set for the baseline validity period and thus the same emission factors are used during monitoring. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 275 |
| Question | General |
| Section | N/A |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Asociación para la Investigación y Desarrollo Integral - AIDER |
| Reviewer Country | Perú |
| Response(s) - including general questions & comments | With the conditions of applicability, selective logging is not applicable through monitoring. In addition, the forest strata that were established in the baseline can no longer be changed in the crediting period. |
| Verra Response | Selective logging is no longer prohibited. Biomass stocks and thus emission factors are set for the baseline validity period and thus the same emission factors are used during monitoring. |
| Aster Global Assessment | The assessment team confirms this condition (selective logging) no longer exists. The assessment team affirms the same stratification is used for calculating baseline and project emissions. |

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| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Selective logging is no longer prohibited. Biomass stocks and thus emission factors are set for the baseline validity period and thus the same emission factors are used during monitoring. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 276 |
| Question | 7 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |
| Reviewer Country | Zambia |
| Response(s) - including general questions & comments | No, we would not. Project level monitoring is essential for effective project implementation, hence we would have to do it anyway. |
| Verra Response | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment | Verra has stated project proponents will be responsible for monitoring. This is congruent with the module. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 277 |
| Question | General |
| Section | Module MON-AUD, v1.0 |
| Page (if relevant) | 4 |
| Line (if relevant) | N/A |
| Reviewer Organization | BioCarbon Partners (BCP) |

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| Reviewer Country | Zambia |
| Response(s) - including general questions & comments | We imagine that using sample points will be a less accurate method compared to that which we currently employ – digitizing actual areas of deforestation from medium resolution imagery. In addition, the use of sample points by PPs is very open to manipulation. |
| Aster Global Assessment | The Methodology developer has not provided a response to this public comment. |
| Aster Global Initial Findings | CL: Please address the original comment. |
| Round 1 Response from Methodology Developer | Section 4.2.3 of the GOIF document “Integration of remote-sensing and ground-based observations for estimation of emissions and removals of greenhouse gases in forests, Edition 3.0” clearly explains that activity data should not be estimated by pixel-counting on wall-to-wall maps but by sampling-based methods to satisfy the IPCC criteria of good practice. While wall-to-wall maps can be used for stratification, and thus reduce the uncertainty of activity data estimates, activity data (e.g., deforestation area) should be estimated by means of sample-based area estimation (SAE) methods. The SAE reduces the bias introduced by counting pixels on wall-to-wall maps stemming from map classification errors, provides estimates of such bias, and estimate the uncertainty of the activity data estimates, as required by the IPCC guidelines. |
| Aster Global Findings Round 2 | The methodology developer cited a publication that indicates SAE methods are preferable to the pixel counting methods described in the public comment. This item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Section 4.2.3 of the GOIF document “Integration of remote-sensing and ground-based observations for estimation of emissions and removals of greenhouse gases in forests, Edition 3.0” clearly explains that activity data should not be estimated by pixel-counting on wall-to-wall maps but by sampling-based methods to satisfy the IPCC criteria of good practice. While wall-to-wall maps can be used for stratification, and thus reduce the uncertainty of activity data estimates, activity data (e.g., deforestation area) should be estimated by means of sample-based area estimation (SAE) methods. The SAE reduces the bias introduced by counting pixels on wall-to-wall maps stemming from map classification errors, provides estimates of such bias, and estimate the uncertainty of the activity data estimates, as required by the IPCC guidelines. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 278 |
| Question | 7 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Biofilica Ambipar Environment; NBS Brazil Alliance; Carbonext |
| Reviewer Country | Brazil |

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| Response(s) - including general questions & comments | <p>We are in favor of the strategy that finds the best balance between operating costs and quality and sufficient accuracy to represent reality in the best way that technological resources provide us today. Although some members of the Alliance finds that Project level monitoring is more appropriate and accurate others believe that centrally monitored by VERRA makes more sense, otherwise all the effort to standardize methodologies is not useful for the monitoring, and might still incur in differences in the VERs.</p> <p>It is interesting that this monitoring is done at both levels. For Verra, as a certifying body that has been taking an increasingly active position in the process of project development, it is important to monitor the jurisdictions, mainly to follow up on the effectiveness of the data developed. Similarly, it is important, within the scope of the project, that the proponents carry out monitoring in order to use the information to establish intelligence strategies for the increasingly effective containment of deforestation and degradation, using resources such as the use of high resolution images and precision analysis in local detail. Additional comments on this have been made in the "general comments" sheet.</p> |
| Verra Response | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment | Verra has stated project proponents will be responsible for monitoring. This is congruent with the module. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 279 |
| Question | General |
| Section | 4 |
| Page (if relevant) | 4 |
| Line (if relevant) | 4 |
| Reviewer Organization | Biofilica Ambipar Environment |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | What if forest strata is better assessed during the project lifetime? |
| Proposed Change(s) | PP should be able to upload a better stratification, when available. |
| Verra Response | Forest strata are set for the baseline validity period. Thus, it is recommended that assessment of stratification be conducted prior to validation. |

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| Aster Global Assessment | Verra's response adequately addresses the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Forest strata are set for the baseline validity period. Thus, it is recommended that assessment of stratification be conducted prior to validation. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 280 |
| Question | General |
| Section | 5.1.1 |
| Page (if relevant) | 5 |
| Line (if relevant) | 7 |
| Reviewer Organization | Biofilica Ambipar Environment; NBS Brazil Alliance; Carbonext |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | Intensifying the sampling density might not be feasible if the data provider have many samples for that jurisdiction. |
| Proposed Change(s) | When possible, sampling density should be done |
| Verra Response | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment | It is unclear how the methodology developer's response addresses the comment. |
| Aster Global Initial Findings | CL: Please clarify in line with the comment. |
| Round 1 Response from Methodology Developer | Comment is unclear. Were it not for physical inaccessibility, sampling density can always be increased. |
| Aster Global Findings Round 2 | The assessment team concurs that the comment is unclear. The methodology developer has provided a reasonable response to the potential intent of the comment. Item addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra | Comment is unclear. Were it not for physical inaccessibility, sampling density can always be increased. |

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| Response October 2023 | |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 281 |
| Question | General |
| Section | 5.1.1 |
| Page (if relevant) | 4 |
| Line (if relevant) | N/A |
| Reviewer Organization | Biofilica Ambipar Environment & NBS Alliance Brazil |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | It is not clear how J-ADB-UD Section 5.5.1, Steps 1-5 shall be replicated for the AUD Project Area and LB Monitoring Period. |
| Proposed Change(s) | The text should specify if the project proponent should replicate the same approach used by the VVB that produced the J-ADB-UD and the FCBMj or if it is suffice to follow a different approach, as long as it follows what is in J-ADB-UD Sections 5.5.1, steps 1-5. Furthermore, it makes sense that the VVB that created the FCBMj and the J-ADB-UD would produce yearly monitoring for the entire JNR and these be provided to project proponents |
| Verra Response | Section 5.3.2.2 Steps 1-5 cover all that is needed to parallel Appendix 1 A1.4.1 for the project case. Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment | Verra's response adequately addresses the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | AUDef Section 5.3.2.2 Steps 1-5 cover all that is needed to parallel Appendix 1 A1.4.1 for the project case. Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 282 |
| Question | General |
| Section | 5.1.1 |
| Page (if relevant) | 5 |

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|---|---|
| Line (if relevant) | N/A |
| Reviewer Organization | Biofilica Ambipar Environment & NBS Brazil Alliance |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | Text before Equations (1) and (2) says such equations would replace Equations 20 and 21 of the J-ADB-UD. However, there are no Equations (20) and (21) in J-ADB-UD. |
| Proposed Change(s) | It seems the correct equation numbers are (15) and (16). |
| Verra Response | Equation numbering has completely changed. |
| Aster Global Assessment | The methodology noted that equation numbering has completely changed as the J-ADB-UD has been incorporated to the module undergoing assessment. As the structure and thus the numbering have changed, this item is addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Equation numbering has completely changed. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 283 |
| Question | General |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Biofilica Ambipar Environment & NBS Brazil Alliance |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | Although the importance of Verra's and the proponents' performance in monitoring at the jurisdictional and project level, respectively, has been raised, some questions remain concerning the monitoring performed by Verra: - What is the purpose of this monitoring? Will Verra try to have some kind of influence or contact with the jurisdiction to be able to make articulations focused on stopping deforestation and degradation? - If Verra conducts this monitoring, will any quality standards be established for the proponents based on the method that will be applied to the projects? |
| Verra Response | Verra would not interfere with a government's policies. If it conducted monitoring, Verra's procedures would be the same as those used for AD collection and allocation. |

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| Aster Global Assessment | <p>In response to: What is the purpose of this monitoring?: Verra has not issued a response. Will Verra try to have some kind of influence or contact with the jurisdiction to be able to make articulations focused on stopping deforestation and degradation?: Verra has stated it will not interfere with govt policy. - If Verra conducts this monitoring, will any quality standards be established for the proponents based on the method that will be applied to the projects? If conducted monitoring, Verra's procedures would be the same as those used for AD collection and allocation.</p> <p>The first question is unanswered. The second question is adequately addressed. The third question is hypothetical and not germane to the methodology as it is not in the scope of Verra to conduct project monitoring.</p> |
| Aster Global Initial Findings | CL: Please address in line with first finding. |
| Round 1 Response from Methodology Developer | Monitoring procedures and guidance have been clarified in the latest version of VM0184 and its AuDef module |
| Aster Global Findings Round 2 | Section 6.2 contains the Data and Parameters monitored and shows the purpose for each component. Therefore, the assessment team believes the methodology developer has addressed this question and taken due account to make edits to include the purpose of monitoring. This item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Monitoring procedures and guidance have been clarified in the latest version of VM0048 and its AUDef module |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 284 |
| Question | 7 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservational International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | "We suggest the potential for flexibility between these two approaches, but we feel that project-level monitoring can be more efficient. That said, there are important questions and considerations: (i) If Verra/third-party produces activity data for the baseline and the PP produces the activity data for the monitoring period, will these two data sets be comparable or compatible? Without clear guidance or requirements, these two data sets could be |

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| | <p>produced using different sources (imagery, resolution) and may therefore not be comparable/compatible.</p> <p>(ii) If Verra/third-party produce this data, will there be additional costs to the PP? Or will these costs be covered under the initial payment to generate the baseline AD?"</p> |
| Verra Response | <p>Current procedures require the project to conduct monitoring to at least the same level that the AD is established. It is possible that in the future Verra will provide data. This would come at a cost to the project proponent in addition to the fee for baseline AD.</p> |
| Aster Global Assessment | <p>(i) The commenter asks if project level data will be used to inform the development of subsequent BVPs or may create conflict with the respective BVP.</p> <p>(ii) Verra has stated in the Module PP will pay for baseline allocation report. This congruent with their response.</p> |
| Aster Global Initial Findings | <p>CL: Please address in line with first finding.</p> |
| Round 1 Response from Methodology Developer | <p>Monitoring procedures and guidance have been clarified in the latest version of VM0184 and its AuDef module</p> |
| Aster Global Findings Round 2 | <p>The response from Verra is generic and does not tell the reviewer where the exact change or clarification was made within VM0184 or the AuDef module. It is again unclear how the commenter's concern was taken into account with the response.</p> |
| Round 2 NCR/CL/OFI2 | <p>CL: Please detail what and where the methodology/module was revised, or where the discussion about conflicting sources of BVP data versus project proponent data was discussed to address the comment and show due account was taken.</p> |
| Round 2 Response from Methodology Developer | <p>Revised Verra response to original comment: Very detailed guidance on how to estimate activity data for estimating project emissions during the monitoring period has been included in Section 5.3.2.2 of module MD00XX. Such instructions are meant to ensure that AD produced by the project are of at least similar accuracy and quality as those produced and utilized by Verra for constructing the baseline.</p> |
| Aster Global Findings Round 3 | <p>Verra has responded with greater detail, and has pointed the commenter to the section of the AUD Module (5.3.2.2). This response adequately addresses the original comment. Closed.</p> |
| Status | <p>closed R3</p> |
| Response Updated Since Finding Closed? | <p>wording/typo updates</p> |
| Revised Verra Response October 2023 | <p>Very detailed guidance on how to estimate activity data for estimating project emissions during the monitoring period has been included in AUDef Section 5.3.2.2 of module MD00XX. Such instructions are meant to ensure that AD produced by the project are of at least similar accuracy and quality as those produced and utilized by Verra for constructing the baseline.</p> |
| Aster Global Assessment of Revised Response | <p>The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required.</p> |
| Comment # | <p>285</p> |
| Question | <p>General</p> |
| Section | <p>4 APPLICABILITY CONDITION</p> |
| Page (if relevant) | <p>4</p> |

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| Line (if relevant) | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | How is "large-scale" defined? How is "natural" defined (e.g., does it consider events where human action has an influence, e.g., overgrazing leading to landslides, human ignition leading to fire, management leading to increased fire severity)? How is "significant degradation of forest carbon stock" defined? What triggers a monitoring requirement for disturbance, and how does this relate to carbon accounting requirements under the new vs. existing methodologies? |
| Proposed Change(s) | Please clarify and provide sources, in-text references, and justification. |
| Verra Response | This applicability condition no longer applies |
| Aster Global Assessment | <p>The Module developer states the applicability condition no longer applies and thus this is comment is N/A. However, the assessment team notes similar language is present in 5.3.1.1. Similarly, A1.3 states "Deforestation must be disaggregated into at least: small-scale and large-scale unplanned deforestation. Other categories do not require disaggregation (see Table 8)." Based on language in A1.4.1 Step 1 Data Collection it appears as though the delineation between large and small scale is 100 ha. Although the mention of 1000 ha to delineate large-scale disturbances in Table 9 conflicts with this.</p> <p>Additionally, the comment asked about the term "natural".</p> <p>The material in the comment has led the assessment team to wonder if "natural", "large-scale" and "disturbance" have been adequately and unambiguously defined.</p> |
| Aster Global Initial Findings | CL: Please address in line with finding. |
| Round 1 Response from Methodology Developer | The section on "Applicability conditions" has been fully rewritten to avoid the use of ambiguous terms. Inconsistencies in the threshold for large vs. small scale has been corrected to 1000 ha |
| Aster Global Findings Round 2 | The assessment team confirms that the applicability conditions have been revised to avoid ambiguity. The referenced threshold is now consistently 1000 ha. A footnote for natural disturbance defines what constitutes a disturbance as "natural." Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The section on "Applicability conditions" has been fully rewritten to avoid the use of ambiguous terms. Inconsistencies in the threshold for large vs. small scale has been corrected to 1000 ha |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 286 |

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| Question | General |
| Section | 5.1.1 Development of Land Cover Transition Data within the AUD Project Area and AUD Leakage Belt for the Monitoring Period |
| Page relevant (if) | 4 |
| Line relevant (if) | N/A |
| Reviewer Organization | Conservational International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>How will Verra ensure the timely delivery of activity data? Right now, there is no assurance that activity data will be produced in a timely manner and with a high level of quality. This evaluation of the methodology is being completed with no knowledge of the third-party provider that Verra will choose - we do not know their capacity, delivery times, reputation, credibility, or level of experience, and we do not know how much this data generation will cost. What safeguards will Verra introduce to ensure that successful AUD projects (those that demonstrate reduced deforestation and generate VCUs) do not end up losing money due to the potentially high cost and long delays for third-party produced activity data?</p> <p>Keep in mind that using third parties with no local knowledge can be particularly problematic especially in heterogenous dry forests and savannahs, something to consider when experts are hired.</p> |
| Proposed Change(s) | Please clarify details and respond to these concerns. |
| Verra Response | <p>Verra is employing various global and local service providers to ensure that we deliver quality data as quickly as possible.</p> <p>Data quality requirements are set out in Appendix 1. The data will be independently assessed prior to its allocation.</p> |
| Aster Global Assessment | <p>In several responses to other related comments, Verra has stated there is no timeline to delivery.</p> <p>The module states "Verra will select and contract an approved data service provider considering their technical expertise, experience in the chosen jurisdiction, financial offer and ability to deliver within the pre-determined timeframe.". And, congruent with the response from Verra, an independent expert assessment of jurisdictional data will be conducted.</p> <p>The assessment team notes that these are not guarantees of quality, however SOPs and independent assessments do provide as safeguards; further timeliness is one factor that Verra will consider when selecting DSPs. But the assessment team also considers that Verra's preferences for DSPs does not include competencies/qualifications (e.g. years of experience utilizing specific skillsets, capacity of personnel, education, etc.).</p> |
| Aster Global Initial Findings | OFI: Given that several comments have raised several concerns about the quality of DSPs, can Verra provide additional criteria, whether binary (e.g. yrs. experience) or qualitative to lend credence to the DSP selection process. |
| Round 1 Response from Methodology Developer | Several points of concerns that were raised during the public consultation have been addressed later on as the process of methodology development and implementation have progressed further. In particular, concerns about the quality and timeliness of activity data production have been addressed through, first, the call for expressions of interest from data service providers, which allowed an initial screening and selection of those that showed to possess suitable qualifications (including experience, |

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| | <p>personnel, familiarity with the VCS, etc.). Secondly, the Terms of Reference formulated for the actual Request for Proposals included a number of specifications and quality requirements that data service providers have to meet for the activity data production process, the final deliverables, and timeframe. Finally, the full proposals that were submitted (by the previously screened data service providers) in response to the Request for Proposals were carefully examined in order to select the most suitable ones.</p> |
| Aster Global Findings Round 2 | The methodology developer has opted to respond to the OFI and notes changes made since. As no response was required, this item is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>Several points of concerns that were raised during the public consultation have been addressed later on as the process of methodology development and implementation have progressed further. In particular, concerns about the quality and timeliness of activity data production have been addressed through, first, the call for expressions of interest from data service providers, which allowed an initial screening and selection of those that showed to possess suitable qualifications (including experience, personnel, familiarity with the VCS, etc.). Secondly, the Terms of Reference formulated for the actual Request for Proposals included a number of specifications and quality requirements that data service providers have to meet for the activity data production process, the final deliverables, and timeframe. Finally, the full proposals that were submitted (by the previously screened data service providers) in response to the Request for Proposals were carefully examined in order to select the most suitable ones.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 287 |
| Question | General |
| Section | 5.1.3 Estimation of the annual emissions from carbon stock changes during the monitoring period |
| Page (if relevant) | 7 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservational International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Again, please provide sources and justifications for the equations and parameters used to ensure the scientific integrity of carbon accounting under VCS. |
| Proposed Change(s) | Please clarify and provide sources, in-text references, and justification. |
| Verra Response | Updated in Section 5.3.2.4 |
| Aster Global Assessment | In 5.3.2.4, The assessment team was unable to locate any references or sources and is unable to determine whether text has been added regarding "justification" |

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| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | The latest version of the AuDef Module clearly states that Carbon stock changes are to be estimated using methods described in the VCS modules |
| Aster's initial response is in/out of scope for VVB review | CLS/2023-09-27: Matt, I removed your CL, as I didn't see that Verra actually has to provide further justification than what they already have in Section 1 Sources. |
| Aster Global Findings Round 2 | The methodology responded to the identified finding by indicating that the module states that carbon stock changes are estimated using methods described in the VCS Modules. Section 1 of the current Module gives a robust list of sources which were used as justification to build the module. These are all in line with or approved under the VCS program, so the assessment team believes the comment has been addressed, and this item is closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The latest version of the AuDef Module clearly states that carbon stock changes are to be estimated using methods described in the VCS modules |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 288 |
| Question | General |
| Section | 5.3 Calculation of net emissions during the Monitoring Period |
| Page (if relevant) | 15 |
| Line (if relevant) | N/A |
| Reviewer Organization | Conservational International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | There is no reference to disturbance other than a brief mention in Section 4 of this module. |
| Proposed Change(s) | Verra should clarify when and how disturbances should be accounted in Section 5 and clearly relate it to this equation. If Verra chooses not to provide specific guidance on when/how disturbances should be accounted, the module should at least state this or require that the PP defer to the requirements of the existing AUD methodologies. |
| Verra Response | Disturbances are now referred to in the project case in Sections 5.3.2.2, 5.3.2.3 and, for the baseline scenario, in Section 5.3.1.1 and Appendix 1. |

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| Aster Global Assessment | <p>The assessment team notes that disturbances have been handled in a more complete manner in the current version of the module.</p> <p>However, findings have arisen regarding the definition of disturbance, natural, and large-scale. This finding is pending resolution of related findings.</p> |
| Round 1 Response from Methodology Developer | Both, the draft M0184 and its module MD00XX have been fully reviewed and edited to avoid the use of ambiguous terms. Further guidelines for the use of terms such as natural disturbances, large vs. small scale have been provided throughout the documents, for instance, with regard to identified exclusions in Table 11 of MD00XX. |
| Aster Global Findings Round 2 | The finding upon which this was pending has been addressed. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Both, the draft VM0048 and its module MD00XX have been fully reviewed and edited to avoid the use of ambiguous terms. Further guidelines for the use of terms such as natural disturbances, large vs. small scale have been provided throughout the documents, for instance, with regard to identified exclusions in Table 11 of MD00XX. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 289 |
| Question | 7 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Terra Global Capital, LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | No, we do not want Verra to monitoring performance. But how could you require baseline AD to be Verra produced by then allow projects to do their own monitoring AD this does not seem to make sense. Project will need to determine their frequency of monitoring. We would also support that under the existing methodologies, where a standardize reference region is used, the project can develop the Jurisdictional FCBM which is subject to VVB and Verra review, that this would be the same process for the AD for monitoring. |
| Verra Response | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data, but we would need to work out the issue the commenter raises re: monitoring frequency. |
| Aster Global Assessment | The assessment team found Verra's response to be incomplete. Please address " We would also support that ...the project can develop the Jurisdictional FCBM..." |
| Aster Global Initial Findings | CL: Please address in line with finding. |
| Round 1 Response from | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data, but we would need to work out the issue the commenter raises re: monitoring frequency. |

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| Methodology Developer | Jurisdictional baseline data cannot be produced by project developers, as this might lead to multiple, likely inconsistent data and maps being produced for the same jurisdiction by the various project developers operating therein. In addition, this would entail a risk (or appearance) of conflict of interest. |
| Aster Global Findings Round 2 | The methodology developer's response now provides an appropriate justification as to why jurisdictional baseline data cannot be produced by project developers, addressing the finding. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data, but we would need to work out the issue the commenter raises re: monitoring frequency. Jurisdictional baseline data cannot be produced by project developers, as this might lead to multiple, likely inconsistent data and maps being produced for the same jurisdiction by the various project developers operating therein. In addition, this would entail a risk (or appearance) of conflict of interest. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 290 |
| Question | 7 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Green Growth Consulting Firm |
| Reviewer Country | Bhutan |
| Response(s) - including general questions & comments | Project level monitoring can be more accurate. |
| Verra Response | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment | Verra has stated project proponents will be responsible for monitoring. This is congruent with the module. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment | The assessment team confirmed that no changes were made to the initial response. No further review is required. |

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| of Revised Response | |
| Comment # | 291 |
| Question | 4 |
| Section | 4 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Green Growth Consulting Firm |
| Reviewer Country | Bhutan |
| Response(s) - including general questions & comments | Applicability conditions is doubtful e.g., where it is applicable? |
| Proposed Change(s) | The applicability conditions should be directly relevant to field circumstances |
| Verra Response | Applicability conditions have changed; see current Section 4 |
| Aster Global Assessment | The assessment team concurs that applicability conditions are listed in the Module. Given the broad/vagueness of the comment--and that the assessment team is evaluating the applicability conditions, this item is closed as it will be addressed by the assessment team. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Applicability conditions have changed; see current AUDef Section 4 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 292 |
| Question | 7 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Radicle Group |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | Although we understand the value of having a centralized approach to AUDD projects, this type of monitoring can be monitored by existing tools, in the case of Brazilian projects. For example, the INPE (National Institute of Spatial Research) data available of PRODES (program that monitors deforestation). In addition, depending on the number of projects, Verra could be overwhelmed with different responsibilities and |

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| | activities, what could jeopardize the overall timeline of projects. It is also important to mention that each jurisdiction has its own particularities, what can be better captured by local developers. |
| Verra Response | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment | Verra has stated project proponents will be responsible for monitoring. This is congruent with the module. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 293 |
| Question | 7 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including general questions & comments | The estimate of AD data is done through point assessments of high resolution satellite data. This is quite a subjective process. Either the PP is required to closely review the BSL analysis or Verra centralize AD monitoring. |
| Verra Response | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment | Verra has stated project proponents will be responsible for monitoring. This is congruent with the module. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 294 |
| Question | General |

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| Section | 5.1.1 |
| Page (if relevant) | 5 |
| Line (if relevant) | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including general questions & comments | Error in DFDef in equations 1&2. Should there also be DFDef-LB? Are the accuracies of the PA and LB analyses separated or combined? |
| Proposed Change(s) | Should be DFDef-PA |
| Verra Response | These equations no longer exist |
| Aster Global Assessment | As the equations identified as problematic by the commenter no longer exists, this item is addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | These equations no longer exist |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 295 |
| Question | 7 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | South Pole |
| Reviewer Country | Global |
| Response(s) - including general questions & comments | It is necessary to include details about the deliveries that PPs will receive from Verra; e.g. the formats of the Deforestation Risk Map and Allocation Report. As long this information is available in an editable format, monitoring at the project level would more appropriate. |
| Verra Response | See Appendix 3 |
| Aster Global Assessment | The assessment team reviewed Appendix 3 of the module which includes what will be delivered to Project Proponents via the AD Baseline Allocation Report, thus addressing the commenter's question. |
| Status | closed R1 |

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| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | See AUDef Appendix 3 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 296 |
| Question | 7 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Systemica |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | As a project developer, project-level monitoring would be more appropriate. The monitoring project is based on an accurate database survey over the years by the project. Monitoring activity data by VERRA may decentralize project data. In addition, when understanding the areas of deforestation and detailing this in the project, it can think about the projection of how this will progress over time and prevention measures. So, monitoring at the project level would be of interest precisely for the simple fact of interconnecting and centralizing information. However, we also consider that the monitoring of projects by Verra can be important to assess the performance of projects over time (for example, after the end of the crediting period) in order to understand the risk of non-permanence of assets, with the objective of ensuring its integrity and permanence over time. |
| Verra Response | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. We will also soon be implementing our Long-term Remote Monitoring System. |
| Aster Global Assessment | Verra has stated project proponents will be responsible for monitoring. This is congruent with the module. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. We will also soon be implementing our Long-term Remote Monitoring System. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 297 |
| Question | 7 |

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| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | It would be ideal if Verra can centralized the monitoring, however that implies that Verra would need an incredible capacity to develop wall-to-wall mapping of deforestation all over the world in several epochs per year in order to match the project crediting period/start date. They would also need an army of field collaborators to validate on the ground the forest loss. It might be more interesting to Verra invest time in developing the requirements to ensure high quality monitoring and enhance VVB capacities to evaluate the outcomes. |
| Verra Response | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment | Verra has stated project proponents will be responsible for monitoring. This is congruent with the module. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 298 |
| Question | 7 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Value for Nature Ltd. |
| Reviewer Country | UK |
| Response(s) - including general questions & comments | No opinion. Both have pros and cons. |
| Verra Response | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment | Verra has stated project proponents will be responsible for monitoring. This is congruent with the module. |
| Status | closed R1 |

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| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 299 |
| Question | 7 |
| Section | 5 |
| Page (if relevant) | N/A |
| Line (if relevant) | N/A |
| Reviewer Organization | Volkswagen-Climate Partner |
| Reviewer Country | Germany |
| Response(s) - including general questions & comments | <p>We would prefer to see project-level monitoring as this can be more accurate even if it lacks the consistency of centralized monitoring and also justifies the use of a VVB for the project. While we would prefer that qualified project proponents create their own AD, we would also see value in minimizing costs and turnaround time for project registration. Therefore, our view is either to allow qualified project proponents to create their own AD, that will be validated by a VVB, or remove the VVB validation component when a verra certified consultant would have provided the AD.</p> <p>Rationale: The suggestion will minimize costs and reduce the turnaround time for AD generation to project feasibility assessment, or validation/verification</p> |
| Verra Response | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment | The assessment team notes that the VVB is no longer required to review AD. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 300 |
| Question | 7 |
| Section | 5 |
| Page (if relevant) | N/A |

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| Line relevant) (if | N/A |
| Reviewer Organization | Wildlife Conservation Society (WCS) |
| Reviewer Country | Rwanda |
| Response(s) - including general questions & comments | If these are not monitored centrally, there will need to be a procedure for reconciling project monitored data and jurisdictional data during subsequent baseline validity periods. |
| Verra Response | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment | The commenter asks if project level data will be used to inform the development of subsequent BVPs. |
| Aster Global Initial Findings | CL: Please address in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra response to original comment: After it is allocated, project proponents use their own emission factors to turn activity data into baselines. However, they cannot change the activity data they are allocated.</p> <p>Before it is allocated, stakeholders can submit data to influence activity data, forest cover benchmark maps and risk maps as set out in Appendix 4 of <i>AUDef</i>. This information will be combined to be allocated.</p> <p>The very simple model based on distance to forest edge is not the one that will (necessarily) be adopted as the jurisdictional deforestation risk model to be used for allocating baselines to projects. This is the benchmark model - something that project proponents and other relevant stakeholders will challenged to beat by contributing other variables that are demonstrably related to deforestation risk in the jurisdiction, and provide the corresponding data. Those additional data will then be used to construct alternative, information richer, more complex models that may be better than the benchmark model at predicting deforestation risk across the entire jurisdiction. The predictive ability of the benchmark and alternative models will be compared in purely statistical terms and the one model that shows the best predictive ability will be the one adopted as the jurisdictional model (and map) of deforestation risk, and used for allocating baselines to projects. This has been described and clarified in the latest version of the <i>AUDef</i> module.</p> <p>Explanation of original Verra comment: Verra adds a response on post-allocated data, affirms the response re: pre-allocated data, and provides more detail on risk mapping in particular.</p> |
| Aster Global Findings Round 2 | The methodology developer has provided a detailed response clarifying data submission and its impacts on informing the model. However, the response does not directly address the commenter's question regarding how this will inform the development of subsequent BVPs. |
| Round 2 NCR/CL/OFI2 | CL: Please address in line with the finding. |
| Round 2 Response from Methodology Developer | <p>Revised Verra response to original comment: After it is allocated, project proponents use their own emission factors to turn activity data into baselines. However, they cannot change the activity data they are allocated.</p> <p>Before it is allocated, stakeholders can submit data to influence activity data, forest cover benchmark maps and risk maps as set out in Appendix 4 of <i>AUDef</i>. This</p> |

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| | <p>information will be combined to be allocated.</p> <p>The very simple model based on distance to forest edge is not the one that will (necessarily) be adopted as the jurisdictional deforestation risk model to be used for allocating baselines to projects. This is the benchmark model - something that project proponents and other relevant stakeholders will challenged to beat by contributing other variables that are demonstrably related to deforestation risk in the jurisdiction, and provide the corresponding data. Those additional data will then be used to construct alternative, information richer, more complex models that may be better than the benchmark model at predicting deforestation risk across the entire jurisdiction. The predictive ability of the benchmark and alternative models will be compared in purely statistical terms and the one model that shows the best predictive ability will be the one adopted as the jurisdictional model (and map) of deforestation risk, and used for allocating baselines to projects. This has been described and clarified in the latest version of the <i>AUDef</i> module.</p> <p>For subsequent Baseline Validity Periods (BVPs) projects will have the opportunity to submit forest cover maps based on their own monitoring of forest cover change over the prior period(s). It will be important for the activity data provider to consider these maps in developing the new Forest Cover Baseline Map (FCBM) for the new BVP. Project-specific data should take precedence where it meets the quality and lack of bias tests.</p> <p>Note to Aster: paragraph on BVPs added</p> |
| Aster Global Findings Round 3 | <p>The Methodology Developer's response states "For subsequent Baseline Validity Periods (BVPs) projects will have the opportunity to submit forest cover maps based on their own monitoring of forest cover change over the prior period(s). It will be important for the activity data provider to consider these maps in developing the new Forest Cover Baseline Map (FCBM) for the new BVP. Project-specific data should take precedence where it meets the quality and lack of bias tests.". The Assessment Team notes that appendix 4 states project-specific FCBMs may be submitted. And that DSPs should review all submissions, including conducting an accuracy assessment on any FCBMs in Appendix 1 A1.4.3 This is sufficiently addressed.</p> |
| Status | closed R3 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>After it is allocated, project proponents use their own emission factors to turn activity data into baselines. However, they cannot change the activity data they are allocated.</p> <p>Before it is allocated, stakeholders can submit data to influence activity data, forest cover benchmark maps and risk maps as set out in Appendix 4 of <i>AUDef</i>. This information will be combined to be allocated.</p> <p>The very simple model based on distance to forest edge is not the one that will (necessarily) be adopted as the jurisdictional deforestation risk model to be used for allocating baselines to projects. This is the benchmark model - something that project proponents and other relevant stakeholders will challenged to beat by contributing other variables that are demonstrably related to deforestation risk in the jurisdiction, and provide the corresponding data. Those additional data will then be used to construct alternative, information richer, more complex models that may be better than the benchmark model at predicting deforestation risk across the entire jurisdiction. The predictive ability of the benchmark and alternative models will be compared in purely statistical terms and the one model that shows the best predictive ability will be the</p> |

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| | <p>one adopted as the jurisdictional model (and map) of deforestation risk, and used for allocating baselines to projects. This has been described and clarified in the latest version of the AUDef module.</p> <p>For subsequent Baseline Validity Periods (BVPs) projects will have the opportunity to submit forest cover maps based on their own monitoring of forest cover change over the prior period(s). It will be important for the activity data provider to consider these maps in developing the new Forest Cover Baseline Map (FCBM) for the new BVP. Project-specific data should take precedence where it meets the quality and lack of bias tests.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 301 |
| Question | J-ADB-UD and BL-UD |
| Section | N/A |
| Reviewer Organization | Asociación para la Investigación y Desarrollo Integral (AIDER) |
| Reviewer Country | Perú |
| Response(s) - including general questions & comments | Are the methodologies applied only for deforestation? In the case of determining and monitoring degradation, how will data on jurisdictional activity and the baseline of the project area be determined? |
| Proposed Change(s) | N/A |
| Verra Response | AUDef is only applicable to deforestation. An unplanned forest degradation module is envisioned at a later stage. In the VCS Program, planned forest degradation is an improved forest management activity. |
| Aster Global Assessment | The commenter asked whether the methodologies are applied only for deforestation. The methodology developer took due account by clarifying that AUDef (a module) is only applicable to deforestation. A future module will address unplanned forest degradation. As this module has not yet been developed, it is reasonable for the methodology developer to respond saying it will be addressed in the future. Clarification is provided that planned forest degradation is an IFM activity. This item is assessed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | AUDef is only applicable to deforestation. An unplanned forest degradation module is envisioned at a later stage. In the VCS Program, planned forest degradation is an improved forest management activity. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 302 |
| Question | J-ADB-UD and BL-UD |
| Section | N/A |

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| Reviewer Organization | Asociación para la Investigación y Desarrollo Integral (AIDER) |
| Reviewer Country | Perú |
| Response(s) - including general questions & comments | How will the activity data be determined, in case a methodology has been developed to determine the data at the jurisdictional level but only in one type of ecosystem? Will the proponent themselves continue to determine the activity data for their project area? |
| Proposed Change(s) | N/A |
| Verra Response | This methodology establishes procedures for Verra to collect and allocate activity data for all project proponents (except those in JNR programs, who will get baseline emissions data from their jurisdictional proponent). |
| Aster Global Assessment | The commenter asked how activity data will be determined in the event of a certain type of ecosystem and whether the project proponent would determine activity data for such a project. The methodology developer took due account by clarifying that Verra collects and allocates activity data for all project proponents based on the methodology established. The project developer further clarified stating that the jurisdictional proponent is responsible for generating and allocating the activity data when a project is to be nested in a registered Jurisdictional and Nested REDD+ framework (JNR). This comment is addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | This methodology establishes procedures for Verra to collect and allocate activity data for all project proponents (except those in JNR programs, who will get baseline emissions data from their jurisdictional proponent). |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 303 |
| Question | J-ADB-UD and BL-UD |
| Section | N/A |
| Reviewer Organization | Asociación para la Investigación y Desarrollo Integral (AIDER) |
| Reviewer Country | Perú |
| Response(s) - including general questions & comments | If a methodology is being worked out at the jurisdictional level that considers different classes of risk than those indicated in the J-ADB-UD methodology, can that activity data be considered? |
| Proposed Change(s) | N/A |
| Verra Response | This methodology establishes procedures for Verra to collect and allocate activity data for all project proponents (except those in JNR programs, who will get baseline emissions data from their jurisdictional proponent). |
| Aster Global Assessment | The methodology developer took due account by clarifying that Verra collects and allocates activity data for all project proponents based on the methodology |

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| | established. The methodology developer further clarified stating that the jurisdictional proponent is responsible for generating and allocating the activity data when a project is to be nested in a registered Jurisdictional and Nested REDD+ framework (JNR). This comment is addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | This methodology establishes procedures for Verra to collect and allocate activity data for all project proponents (except those in JNR programs, who will get baseline emissions data from their jurisdictional proponent). |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 304 |
| Question | J-ADB-UD and BL-UD |
| Section | N/A |
| Reviewer Organization | Asociación para la Investigación y Desarrollo Integral (AIDER) |
| Reviewer Country | Perú |
| Response(s) - including general questions & comments | For projects that are already underway, the next baseline to be established, what process will take place? following the new J-AUDB-UD and BL-UD methodologies? |
| Proposed Change(s) | N/A |
| Verra Response | See the Verra website post Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits for information on projects' transition to the new methodology. |
| Aster Global Assessment | The methodology developer took due account of the commenter's question by pointing them to a Verra website post. The assessment team reviewed the post and determined it contains sufficient information to address the commenter's posed question, as well as additional information regarding the transition. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | See the Verra website post Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits (https://verra.org/consolidated-redd-methodology-ensures-integrity-of-forest-conservation-credits/) for information on projects' transition to the new methodology. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 305 |
| Question | J-ADB-UD and BL-UD |
| Section | N/A |

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| Reviewer Organization | Asociación para la Investigación y Desarrollo Integral (AIDER) |
| Reviewer Country | Perú |
| Response(s) - including general questions & comments | How do you proceed if the necessary buffer to delimit the Jurisdictional FCBM covers another Jurisdiction? |
| Proposed Change(s) | N/A |
| Verra Response | The jurisdictional FCBM doesn't need a buffer |
| Aster Global Assessment | The commenter asked a question about a process involving the buffer of a jurisdictional FCBM buffer. The methodology developer clarified that jurisdictional FCBMs do not need a buffer, thus demonstrating the insignificance of the comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The jurisdictional FCBM doesn't need a buffer |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 306 |
| Question | J-ADB-UD and BL-UD |
| Section | N/A |
| Reviewer Organization | Asociación para la Investigación y Desarrollo Integral (AIDER) |
| Reviewer Country | Perú |
| Response(s) - including general questions & comments | What happens when I want to apply different emission factors, but the FCBM generated by the proponent is not accepted by Verra? |
| Proposed Change(s) | N/A |
| Verra Response | The FCBM is only a forest/non-forest map. A forest stratification map is developed by the project. In addition, all emission factors are developed at the project level. |
| Aster Global Assessment | The methodology developer clarified that the FCBM is created by Verra and a forest stratification map is developed by the project. As the FCBM is not created by the proponent as suggested by the commenter, the methodology developer demonstrated the insignificance of the comment. Further clarification is provided that emission factors are developed at the project level. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |

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| Revised Verra Response October 2023 | The FCBM is only a forest/non-forest map. A forest stratification map is developed by the project. In addition, all emission factors are developed at the project level. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 307 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Biofilica Ambipar Environment & NBS Brazil Alliance |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | What will happen to projects already validated and verified by Verra under the current AUD methodologies? Will projects have the option, if they wish, to continue following the current methodology? When will projects with validated baselines have to adapt to the jurisdictional approach, will they have to wait for the re-evaluation of the baseline or, according to the established deadlines, will they have to adapt? |
| Proposed Change(s) | N/A |
| Verra Response | See the Verra website post Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits for information on projects' transition to the new methodology. |
| Aster Global Assessment | The methodology developer took due account of the commenter's question by pointing them to a Verra website post. The assessment team reviewed the post and determined it contains sufficient information to address the commenter's posed question, as well as additional information regarding the transition. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | See comment #304 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 308 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Carbonext |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | 1. After the PP requests AD data, in case there are no other registered and ongoing JNR or program in the same jurisdiction, how long does Verra have to present the data? |

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| Proposed Change(s) | N/A |
| Verra Response | It is anticipated that the production and validation of allocated AD to a given project will take about six months, however, this time period may vary depending on data availability and validation period. |
| Aster Global Assessment | The commenter asked for a timeline regarding production of AD. The commenter took due account by providing an estimated timeline, noting the referenced timeline may vary. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | It is anticipated that the production and validation of allocated AD to a given project will take about six months, however, this time period may vary depending on data availability and validation period. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 309 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Carbonext |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | 2. Will there be a procedure for project developers to question and make additions to allocated activity data, based on more detailed data on the region, such as presence of roads etc.? |
| Proposed Change(s) | N/A |
| Verra Response | See Appendix 4 for details on the supplemental materials stakeholders can submit |
| Aster Global Assessment | The methodology developer directs the commenter to Appendix 4 of the methodology. The assessment team reviewed Appendix 4 and it appears that based on Table 17, it appears that the answer to the commenter's question is no. While referring commenters to sections/documents in some cases, may be appropriate, the assessment team has determined that a direct response is more appropriate. |
| Aster Global Initial Findings | CL: Please provide a direct response to this commenter's question. |
| Round 1 Response from Methodology Developer | <p>Revised Verra response to original comment:</p> <p>After it is allocated, project proponents use their own emission factors to turn activity data into baselines. However, they cannot change the activity data they are allocated.</p> <p>Before it is allocated, stakeholders can submit data to influence activity data, forest cover benchmark maps and risk maps as set out in Appendix 4 of <i>AUDef</i>. This information will be combined to be allocated.</p> <p>The very simple model based on distance to forest edge is not the one that will (necessarily) be adopted as the jurisdictional deforestation risk model to be used for</p> |

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| | <p>allocating baselines to projects. This is the benchmark model - something that project proponents and other relevant stakeholders will challenged to beat by contributing other variables that are demonstrably related to deforestation risk in the jurisdiction, and provide the corresponding data. Those additional data will then be used to construct alternative, information richer, more complex models that may be better than the benchmark model at predicting deforestation risk across the entire jurisdiction. The predictive ability of the benchmark and alternative models will be compared in purely statistical terms and the one model that shows the best predictive ability will be the one adopted as the jurisdictional model (and map) of deforestation risk, and used for allocating baselines to projects. This has been described and clarified in the latest version of the <i>AUDef</i> module.</p> <p>Explanation of original Verra comment: Verra adds a response on post-allocated data, affirms the response re: pre-allocated data, and provides more detail on risk mapping in particular.</p> |
| Aster Global Findings Round 2 | The revised comment provided by the methodology developer provides additional information sufficient to close the identified finding. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>After it is allocated, project proponents use their own emission factors to turn activity data into baselines. However, they cannot change the activity data they are allocated.</p> <p>Before it is allocated, stakeholders can submit data to influence activity data, forest cover benchmark maps and risk maps as set out in Appendix 4 of <i>AUDef</i>. This information will be combined to be allocated.</p> <p>The very simple model based on distance to forest edge is not the one that will (necessarily) be adopted as the jurisdictional deforestation risk model to be used for allocating baselines to projects. This is the benchmark model - something that project proponents and other relevant stakeholders will challenged to beat by contributing other variables that are demonstrably related to deforestation risk in the jurisdiction, and provide the corresponding data. Those additional data will then be used to construct alternative, information richer, more complex models that may be better than the benchmark model at predicting deforestation risk across the entire jurisdiction. The predictive ability of the benchmark and alternative models will be compared in purely statistical terms and the one model that shows the best predictive ability will be the one adopted as the jurisdictional model (and map) of deforestation risk, and used for allocating baselines to projects. This has been described and clarified in the latest version of the <i>AUDef</i> module.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 310 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Carbonext |
| Reviewer Country | Brazil |

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| Response(s) - including general questions & comments | 3. Is it possible for current project developers to become Activity Data Providers, and if so what are the procedures and requirements for doing so? |
| Proposed Change(s) | N/A |
| Verra Response | Yes, project developers can be (at present) data service providers A call for Expressions of Interest (https://verra.org/eoi-request-collection-of-jurisdictional-deforestation-data-for-allocation-to-vcs-projects/) with the general description of the tasks to be carried out and the qualifications to be met by activity data providers. RFPs for data service providers for specific jurisdictions will be posted to https://verra.org/methodologies/redd-methodology/ . |
| Aster Global Assessment | The methodology developer took due account by addressing the commenters question and clarifying the project developers can be DSPs and provided information on how they may go about applying. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Yes, project developers can be (at present) data service providers A call for Expressions of Interest (https://verra.org/eoi-request-collection-of-jurisdictional-deforestation-data-for-allocation-to-vcs-projects/) with the general description of the tasks to be carried out and the qualifications to be met by activity data providers. RFPs for data service providers for specific jurisdictions will be posted to the Verra website https://verra.org/methodologies/redd-methodology/ . |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 311 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Carbonext |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | 4. (related to q.3 above) Is it correct that local risk maps can be generated by anyone as long as they meet the minimum requirements and then submit to Verra for validation? This won't be dependent on government investment, right? |
| Proposed Change(s) | N/A |
| Verra Response | See Appendix 4 for details on the supplemental materials stakeholders can submit. |
| Aster Global Assessment | The methodology developer directs the commenter to Appendix 4 of the methodology. The assessment team reviewed Appendix 4 and it appears that based on Table 17, it appears that the answer to the commenter's question is yes. However, there appears to be some confusion as submission of a risk map by a project proponent must be reviewed by a DSP, and not validated by Verra. |
| Aster Global Initial Findings | CL: Please provide a direct response to this commenter's question. |

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| Round 1 Response from Methodology Developer | <p>Revised Verra response to original comment: No, deforestation risk models and maps will be produced by Verra, either directly or through its contractors, at the jurisdictional (not local) level and not by project developers. Nevertheless, project proponents and other relevant stakeholders are going to be prompted to recommend other variables that are demonstrably related to deforestation risk in the jurisdiction, and provide the corresponding data. Those additional data will then be used to construct alternative, information richer, more complex models that may be better than the benchmark model at predicting deforestation risk across the entire jurisdiction. The predictive ability of the benchmark and alternative models will be compared in purely statistical terms and the one model that shows the best predictive ability will be the one adopted as the jurisdictional model (and map) of deforestation risk, and used for allocating baselines to projects. This has been described and clarified in the latest version of the <i>AUDef</i> module.</p> <p>Explanation of original Verra comment: Verra's response pointed more generally to the parts of a risk map that can be submitted by the PP.</p> |
| Aster Global Findings Round 2 | The revised comment provided by the methodology developer provides additional information sufficient to close the identified finding. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>No, Deforestation risk models and maps will be produced by Verra, either directly or through its contractors, at the jurisdictional (not local) level and not by project developers. Nevertheless, project proponents and other relevant stakeholders will are going to be prompted to recommend other variables that are demonstrably related to deforestation risk in the jurisdiction, and provide the corresponding data. Those additional data will then be used to construct alternative, information richer, more complex models that may be better than the benchmark model at predicting deforestation risk across the entire jurisdiction. The predictive ability of the benchmark and alternative models will be compared in purely statistical terms and the one model that shows the best predictive ability will be the one adopted as the jurisdictional model (and map) of deforestation risk, and used for allocating baselines to projects. This has been described and clarified in the latest version of the <i>AUDef</i> module.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 312 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Carbonext |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | 5. Will a database be available with the project areas, and leakage belts of other AFOLU projects, for the definition of the leakage belt? |
| Proposed Change(s) | N/A |

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| Verra Response | Verra is working on making this information available on a jurisdiction-by-jurisdiction basis |
| Aster Global Assessment | The methodology developer took due account by clarifying that the database the commenter referenced is being developed on a jurisdiction by jurisdiction basis. |
| Aster Global Findings Round 2 | Clarification sufficient to address the commenters concern is now included in the referenced section. Item closed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Verra is working on making this information available on a jurisdiction-by-jurisdiction basis on the Verra website |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 313 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Carbonext |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | 6. Overlap between the LB and the LB of projects that have already been validated or that have already been listed on the Verra website will not be allowed, correct? If there are two different PPs doing projects in the same region simultaneously, how will it be possible to guarantee that there is no LB overlap before being listed on the Verra website? |
| Proposed Change(s) | N/A |
| Verra Response | Leakage belt overlap is addressed in Section 5.1.3 |
| Aster Global Assessment | The methodology assessment team refers the commenter to Section 5.1.3 of the module. The assessment team reviewed Section 5.1.3 and was unable to find language that answers the question the commenter raised. |
| Aster Global Initial Findings | CL: Please provide a direct response to this commenter's question. |
| Round 1 Response from Methodology Developer | <p>Revised Verra response to original comment: Potential overlap of leakage belts is now addressed in section 5.1.3 of the <i>AuDef</i> module; detailed procedural guidance is provided in sections A1.1 and A1.2 of Appendix 1 of such module.</p> <p>Explanation of original response: too simplistic? Added clarification</p> |
| Aster Global Findings Round 2 | Section 5.1.3 does include additional information regarding potential overlap of leakage belts. However, the commenter was seeking clarification on how to determine the overlap when projects are seeking simultaneous listing, regardless of the 5-year verification timeline in Section 5.1.3. |
| Round 2 NCR/CL/OFI2 | CL: Please clarify how projects not currently listed, or listed and validated but not currently verified, will be differentiated for the leakage belt determination. |

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| Round 2 Response from Methodology Developer | Revised Verra response to original comment: Section 5.1.3 of the AUDef module clarifies the condition under which projects could omit leakage emissions from overlapping portions of UDef LB. The situation described in the finding (i.e., two projects seeking simultaneous listing) would not meet the conditions. As a result, both projects will have to account for leakages in the overlapping area. A sentence has been added to this section to clarify the process if the conditions are not met. |
| Aster Global Findings Round 3 | The Developer has responded (and added revisions to v0.6 of the module) that the instance of two projects not meeting the conditions permitting omission of leakage emissions associated with other overlapping VCS LBs shall result in both projects receiving an AD allocation for the overlapping UDef against which they will monitor deforestation. This clarification and revision sufficiently addresses the comment. |
| Status | closed R3 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Section 5.1.3 of the AUDef module clarifies the condition under which projects could omit leakage emissions from overlapping portions of UDef LB. The situation described in the finding (i.e., two projects seeking simultaneous listing) would not meet the conditions. As a result, both projects will have to account for leakages in the overlapping area. A sentence has been added to this section to clarify the process if the conditions are not met. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 314 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Carbonext |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | 7. What will be the cost for the PP for requesting the AD data? After data is already available, will there still be costs? |
| Proposed Change(s) | N/A |
| Verra Response | We are currently developing a fee structure to determine the cost of AD generation and allocation to projects. Our plan is to achieve an equitable cost-sharing fee structure. |
| Aster Global Assessment | The methodology developer noted that a fee structure is being developed to address the cost of AD generation. As this has not yet been finalized, a firm cost can seemingly not be provided. However, the methodology developer did not respond to the second part of the commenters question, specifically "After data is already available, will there still be costs?" |
| Aster Global Initial Findings | CL: Please provide a direct response to this commenter's second question. |

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| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: Fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects. Fees will be structured in a way that is the same for all projects; the first project in a jurisdiction will not pay for the entire cost and future projects will also pay, even after such data is available. The fee structure (in summary or in part) will be released in tandem with the final methodology. |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Round 2 Response from Methodology Developer | The very simple model based on distance to forest edge is not the one that will (necessarily) be adopted as the jurisdictional deforestation risk model to be used for allocating baselines to projects. This is the benchmark model - something that project proponents and other relevant stakeholders will challenged to beat by contributing other variables that are demonstrably related to deforestation risk in the jurisdiction, and provide the corresponding data. Those additional data will then be used to construct alternative, information richer, more complex models that may be better than the benchmark model at predicting deforestation risk across the entire jurisdiction. The predictive ability of the benchmark and alternative models will be compared in purely statistical terms and the one model that shows the best predictive ability will be the one adopted as the jurisdictional model (and map) of deforestation risk, and used for allocating baselines to projects. This has been described and clarified in the latest version of the AUDef module. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects. Fees will be structured in a way that is the same for all projects; the first project in a jurisdiction will not pay for the entire cost and future projects will also pay, even after such data is available. The fee structure (in summary or in part) will be released in tandem with the final methodology. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 315 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Carbonext |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | 8. How will cases in which there is an overlapping jurisdictional risk map be handled, proving that the latter is more accurate than the first one? Does one replace each other? Or is it no use even submitting for evaluation, given that there is already a jurisdiction in force? |

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| Proposed Change(s) | N/A |
| Verra Response | Jurisdictional risk maps will remain valid for the duration of the jurisdictional AD baseline period (six years). During such period, no other risk maps would be developed for the jurisdiction. |
| Aster Global Assessment | Due account was taken by the methodology developer as clarification was provided that a sole jurisdictional map is to be in place for the entire BVP. This item is addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Jurisdictional risk maps will remain valid for the duration of the jurisdictional AD baseline period (six years). During such period, no other risk maps would be developed for the jurisdiction. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 316 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Carbonext |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | 9. How long will it take for projects that have already been validated, and even verified, to adapt to the new baseline? |
| Proposed Change(s) | N/A |
| Verra Response | See the Verra website post Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits for information on projects' transition to the new methodology. |
| Aster Global Assessment | The methodology developer took due account of the commenter's question by pointing them to a Verra website post. The assessment team reviewed the post and determined it contains sufficient information to address the commenter's posed question, as well as additional information regarding the transition. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | See the Verra website post Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits (https://verra.org/consolidated-redd-methodology-ensures-integrity-of-forest-conservation-credits/) for information on projects' transition to the new methodology. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |

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| Comment # | 317 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Carbonext |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | 10. If AD is not provided within the grace period, how should projects that are already validated proceed? |
| Proposed Change(s) | N/A |
| Verra Response | See the Verra website post Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits for information on projects' transition to the new methodology. |
| Aster Global Assessment | The methodology developer directed the commenter to a website post. The assessment team reviewed the post, and could not locate information that addresses the commenters concern. |
| Aster Global Initial Findings | CL: Please clarify in line with the commenter's question, and provide a response to the scenario in which activity data is not provided in the 6 month grace period. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Since this comment was written, there is no more grace period. Project proponents should See the Verra website post 'Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits for information on projects' transition to the new methodology. If their situation isn't listed there or in the linked FAQs, they should contact Verra to discuss options.</p> <p>Explanation of original Verra response: Verra affirms response but adds detail.</p> |
| Aster Global Findings Round 2 | <p>The assessment team reviewed the website post 'Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits' which appears to indicate that a grace period is still in place.</p> <p>The methodology developer's response still does not provide a response to the scenario in which activity data is not provided in the 6-month grace period.</p> |
| Round 2 NCR/CL/OFI2 | <p>CL: Please clarify whether there is a grace period associated with adoption of the new methodology.</p> <p>CL: Please clarify in line with the commenter's question, and provide a response to the scenario in which activity data is not provided in the 6-month grace period.</p> |
| Round 2 Response from Methodology Developer | <p>Revised Verra response to original comment: The "Updated Timelines for Adoption" section of Verra's February 2023 announcement clarifies that "Once activity data are available for a jurisdiction, all projects in this jurisdiction (new, listed, or registered) can adopt the new REDD methodology. After a six-month grace period following the activity data release, the new methodology becomes mandatory...". This addresses both issues.</p> |
| Aster Global Findings Round 3 | The revised comment now clarifies there is a grace period that extends six months after release of activity data. This sufficiently addresses the findings. |
| Status | closed R3 |
| Response Updated | wording/typo updates |

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| Since Finding Closed? | |
| Revised Verra Response October 2023 | The "Updated Timelines for Adoption" section of Verra's February 2023 announcement (https://verra.org/consolidated-redd-methodology-ensures-integrity-of-forest-conservation-credits/) clarifies that "Once activity data are available for a jurisdiction, all projects in this jurisdiction (new, listed, or registered) can adopt the new REDD methodology. After a six-month grace period following the activity data release, the new methodology becomes mandatory...". This addresses both issues. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 318 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Carbonext |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | 11. Does the PP need to request previously the AD revised after the 6 years or will Verra provided it automatically? In case the PP needs to solicitate previously, how far in advance should it be requested? |
| Proposed Change(s) | N/A |
| Verra Response | PPs will always need to submit a <i>AD Baseline Allocation Request Form</i> via the Verra registry to be allocated baseline information. The project should request this information within two years of the end of its current baseline validity period. |
| Aster Global Assessment | The methodology developer clarified that an AD Baseline Allocation Request Form will always need to be submitted and that project should request this information within two years of the end of its BVP. It is unclear if this two-year suggestion has been included in any documentation that is publicly available. |
| Aster Global Initial Findings | CL: Please clarify if it has been made public that project developers should request activity data 2 years before the end of the BVP. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The procedure for existing projects to be allocated information for their second baseline will be added to the Registration and Issuance Procedure, which will be updated and released in 2024 - well before any project needs a second round of activity data.</p> <p>Explanation of original Verra response: We were thinking AD would always need to be requested, but realize now that we'll simply be able to allocate data to existing projects.</p> <p>Response to additional points raised by Aster: This process has not been made public nor is it within scope of the assessment.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |

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| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The procedure for existing projects to be allocated information for their second baseline will be added to the Registration and Issuance Procedure, which will be updated and released in 2024 - well before any project needs a second round of activity data. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 319 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Carbonext |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | 12. Regarding the Leakage outside of PA and LB (within national boundaries): considering a continental country such as Brazil, with multiple biomes and specific legislation for each, could the non-geographically constrained leakage be restricted to the biome where the project is located in? |
| Proposed Change(s) | N/A |
| Verra Response | Non-geographically constrained leakage is national, even for countries as large and diverse as Brazil. |
| Aster Global Assessment | The commenter clarified that non-geographically constrained leakage is always national. However, it is unclear to the assessment team if the proposed scenario of subnational assessment was considered. |
| Aster Global Initial Findings | CL: Please clarify if a subnational assessment was considered. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Non-geographically constrained leakage is national, even for countries as large and diverse as Brazil. Subnational assessment was considered, but overall it was considered simple and consistent to only consider national assessment.</p> <p>Explanation of original Verra response: The original response has been amended with reference to the consideration of other options.</p> |
| Aster Global Findings Round 2 | The methodology developer's revised response indicates that subnational assessment was considered, but it was ultimately decided to only consider the national assessment. This response addresses the assessment team's finding. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |

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| Revised Verra Response October 2023 | Non-geographically constrained leakage is national, even for countries as large and diverse as Brazil. Subnational assessment was considered, but overall it was considered simple and consistent to only consider national assessment. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 320 |
| Question | Protected Areas |
| Section | N/A |
| Reviewer Organization | Carbon Green Investments (Carbongreeninv) - wishes to be anonymous |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | The deforestation risk in protected areas is not heavily dependent on distance from forest edge as it is in most frontier and mosaic types of deforestation in wildernesses or other non-protected areas. For protected areas in third world countries, the deforestation pattern is in form of a patchy network of unsanctioned clearing (encroachment), that is poorly enforced due to limited capacity since most of these protected areas are government owned. Therefore, factors such as law enforcement capacity and perceived ecosystem value are often the main determinants of deforestation risk. Revenue from REDD+ can effectively address these factors to help protect the project area as a whole unit. We fear that the current J-ADB-UD module, as it stands, will allocate high-risk classes to the perimeter pixels only and allocate mostly insignificant (zero) risk classes to the core areas of protected areas which will end up lowering the credit generation per ha potential of the project area, thereby discouraging conservation of protected areas through REDD+. Poor governments may not get other sources of revenue to strengthen law capacity in those "perceived" low risk areas apart from REDD+ revenue. |
| Proposed Change(s) | We suggest that risk classes be allocated from minimum to high, not insignificant to high and that a special baseline allocation for protected areas, that uses protected area-specific parameters in addition to distance from forest edge be developed and used. The sub module can still use a jurisdictional risk map but then allocates the baseline in manner similar to the current VM0009 reference area approach to project the behavior of the drivers and agents of deforestation in the reference area to the project area, even if tenure types are different. |
| Verra Response | This comment relates to the <i>Unplanned Deforestation Risk Modeling and Mapping Procedure (UDef-RP)</i> . The updated deforestation risk modelling and mapping approach utilizes distance to forest edge only to construct an initial ("the benchmark") deforestation risk model/map. Alternative, information-richer deforestation risk models/maps -which might include other relevant variables such as those mentioned in the comment- can be constructed and considered. The predictive ability of all the deforestation risk (alternative plus benchmark) maps under consideration are statistically compared and the one showing the greatest predictive ability is then selected as the best risk map; conditioned to a favorable expert validation, the map thus selected is then adopted as the "jurisdictional deforestation risk map". |
| Aster Global Assessment | The assessment team does not have a version of the UDef-RP. As such the assessment team cannot determine whether the changes made are sufficient to address the commenter's concern. |
| Aster Global Initial Findings | CL: Please provide the assessment team with a copy of the current UDEF-RP. |
| Round 1 Response | Response to additional point raised by Aster: The <i>UDef-RP</i> has been shared with Aster |

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| from Methodology Developer | |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | This comment relates to VT0007 Unplanned Deforestation Risk Modeling and Mapping and Allocation Tool Procedure (UDef-RATP) . The updated deforestation risk modelling and mapping approach utilizes distance to forest edge only to construct an initial ("the benchmark") deforestation risk model/map. Alternative, information-rich deforestation risk models/maps -which might include other relevant variables such as those mentioned in the comment- can be constructed and considered. The predictive ability of all the deforestation risk (alternative plus benchmark) maps under consideration are statistically compared and the one showing the greatest predictive ability is then selected as the best risk map; conditioned to a favorable expert validation, the map thus selected is then adopted as the "jurisdictional deforestation risk map". |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 321 |
| Question | Costs of Data Acquisition |
| Section | N/A |
| Reviewer Organization | Carbon Green Investments (Carbongreeninv) - wishes to be anonymous |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Since Verra proposes to assign VVBs to validate activity data allocated to projects, we don't understand the rationale of having only verra consultants generate this data. It could cut costs and time if qualified proponents are allowed to create their own AD, which will then be validated by the verra-assigned VVBs. |
| Proposed Change(s) | We therefore suggest that either qualified project proponents be allowed to create their own AD, or Verra removes the VVB validation requirement when a verra certified consultant would have provided the AD. The shortened process will minimize costs and reduce the turn-around time for AD generation to project feasibility assessment, or validation/verification |
| Verra Response | Independent experts will review AD allocated to projects. VVBs should not assess this in their validation or verification audits. See Appendix 4 for details on the supplemental materials stakeholders can submit. |
| Aster Global Assessment | The commenter proposed a change to the AD creation process. The methodology developer restated the process currently in place. It is unclear how due account of this comment and associated proposed change was taken. |

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| Aster Global Initial Findings | CL: Please clarify how due account of the comment and associated proposed change was taken. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: It would not indeed be more efficient for each project to generate the AD when it needs to be done across the entire jurisdiction. That would instead result in every project re-doing the same work that any other project in the jurisdiction would also need to do. It would result in significant duplication of effort and cost. At a more fundamental level, allowing projects to develop their own AD would go against a basic principle of this module, which is to better facilitate nesting of project baselines into a jurisdictional accounting system. Having different projects creating their own baselines would result in incompatible baselines among projects within the same jurisdiction. |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Activity data needs to be consistent It would not indeed be more efficient for each project to generate the AD when it needs to be done across the entire jurisdiction. That would instead result in every project re-doing the same work that any other project in the jurisdiction would also need to do. It would result in significant duplication of effort and cost. At a more fundamental level, Allowing projects to develop their own AD would go against a basic principle of this module, which is to better facilitate nesting of project baselines into a jurisdictional accounting system. Having different projects creating their own baselines would result in incompatible baselines among projects within the same jurisdiction. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 322 |
| Question | Grace Period and Transition Phase |
| Section | N/A |
| Reviewer Organization | Carbon Green Investments (Carbongreeninv) - wishes to be anonymous |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | There is a lot of uncertainty about the timeline of the new modules. Verra has put the validation and verification of new or existing nested projects on hold, which is holding up project development and impacting investment. Historically, Verra hasn't been firm with deadlines and has often taken too long to implement new methodologies/procedures. Projects cannot afford the extra waiting time. |
| Proposed Change(s) | We therefore suggest that verra establishes a transition period and allow all new projects and baseline reevaluation projects to register under the old methodologies and only update to the new methodologies at their next baseline reevaluation time. |

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| Verra Response | See the Verra website post Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits for information on projects' transition to the new methodology. |
| Aster Global Assessment | The commenter suggested that the Verra establishes a transition period for adopting the new methodology. The methodology developer directed the commenter to a Verra website post. This post sets firm deadlines for the transition. It is unclear how/if the proposed change of allowing projects to wait to transition to the new methodology until their next baseline update has been considered. |
| Aster Global Initial Findings | CL: Please clarify how due account of the comment and associated proposed change was taken. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The transition to the new methodology has been underway for two years already, and will not be fully required until 2025. That is an appropriate transition. Continued use of the old methodologies will not be allowed as there is concern about the potential lack of atmospheric additionality for some projects under existing methodologies. We understand this is impacting project development and finance, however, it is our belief that it is essential to ensuring the integrity of the market to push the transition to the new methodology.</p> <p>Explanation of original Verra response: The web post describes the transition period that is being implemented.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>The transition to the new methodology has been projected for over two years. As explained in this announcement: https://verra.org/consolidated-redd-methodology-ensures-integrity-of-forest-conservation-credits/, appropriate time will be allowed for projects to transition once the meth is able to be implmeneted in their jurisdiction. has been underway for two years already, and will not be fully required until 2025. That is an appropriate transition.</p> <p>Continued use of the current methodologies would result in lack of alignment at the jurisdictional level not be allowed as there is concern about the potential lack of atmospheric additionality for some projects under existing methodologies. We understand the transition impacts is impacting project development and finance, however, it is our belief that it is essential to ensuring the integrity of the market to push the transition to the new methodology.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 323 |
| Question | Baseline Validity Period |
| Section | N/A |

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| Reviewer Organization | Carbon Green Investments (Carbongreeninv) - wishes to be anonymous |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | The short-term baseline validity periods for projects that join during an already allocated baseline creates investment uncertainty. It would give projects better decision-making opportunities in terms of investment projections if all new projects can start with at least one full baseline validity period (6 years). |
| Proposed Change(s) | We therefore suggest that new projects that join mid-way of a baseline validity period be allowed to carry over their first baseline allocation into the next baseline validity period and only change after they have had at least 6 years of a uniform baseline. This would allow new projects to maintain their first baseline for enough time to promote investor confidence. |
| Verra Response | The following text has been added in Section 8.1.1 of M0184 relating to projects' adoption of the jurisdictional baseline: "Where a project validates or transitions to VM0184 after the initial year of a jurisdictional BVP, the project proponent(s) may choose to request allocation of data from the subsequent jurisdictional BVP when that BVP begins. Alternatively, the initial project BVP may be the duration set out in the VCS Standard – regardless of whether it spans two jurisdictional BVPs. After the initial project BVP, the project must adopt an allocation from the respective jurisdictional baseline. Subsequent project BVPs must be the same duration as the jurisdictional BVP." |
| Aster Global Assessment | The implications of the referenced text are unclear to the assessment team. |
| Aster Global Initial Findings | CL: Please clarify the implications of the referenced text and consider revising the language to make it more clear. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Out of practical considerations, Verra has made an allowance for projects during their first baseline validity period to carry over their AD allocation into a subsequent BVP under certain circumstances, as described in Section 8.1.1 of M0184 v0.4. Project proponents may elect to update to the second jurisdictional BVP up to two years after that BVP begins.</p> <p>Explanation of original Verra response: The updated text in Section 8.1.1 allows the option proposed by the commenter.</p> |
| Aster Global Findings Round 2 | The assessment team confirms that the language in Section 8.1.1 is now clear and adequately addresses the comment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | See comment #168 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 324 |
| Question | General |

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| Section | N/A |
| Reviewer Organization | Conservation International (CI) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>Applying the JNR risk mapping and allocation method causes many issues. This methodology relies on a correlation that assumes the recent past reflects the near future. It precludes the use of any knowledge of the local context and the agents and drivers of deforestation – e.g., spatial distribution of known illegal logging issues, planned road construction, migration trends, etc. The JNR Risk Mapping Tool does not cite evidence to show that it is a reliable and accurate method for mapping risks. Instead, it uses a justification of unreliable or out-of-date data for many countries as the reason for not including other factors.</p> <p>Despite evidence regarding the importance of other factors, especially distance to existing and planned roads, these are excluded from the process proposed by this methodology. Even when the risk maps produced by project developers with GIS & RS teams are better than those produced by the third-party AD provider (in which case, they may be used, based on the text of the JNR Risk Mapping Tool), the impression from the methodology as currently written is that the PP must pay to generate Verra’s risk maps. In such cases, Verra may be requiring PPs and project developers to buy a product of lower quality what they can produce themselves.</p> <p>Verra is requiring a [potentially, because they still have not provided a price] huge investment from the project proponent to generate activity data. At the time when the PP submits the AD request and is required to buy the data, the PP will not be able to know whether or not the project is financially feasible (will generate enough VCUs to cover the cost of the AD generation and implementation costs). Such a change creates additional barriers and potential hesitation to pursue AUD projects verified under the VCS standard, especially for smaller projects and organizations with limited access to financial capital.</p> |
| Proposed Change(s) | <p>A systematic literature review must be completed, and the risk mapping and allocation methodologies should be modified to reflect the best available evidence. There is currently no indication that these modules were designed based on a thorough review of the literature. If a systematic review has been completed, this should be reflected in the methodology by providing the relevant citations and justifications in the JNR Risk Mapping Tool, Allocation Tool, and new AUD methodology modules. At present, none of these documents provide any indication that they were designed based on scientific evidence and best practices because they do not cite or reference any specific literature.</p> |
| Verra Response | <p>Please see the latest versions of the <i>UDef-RP</i> and the <i>Unplanned Deforestation Activity Data Allocation Procedure (UDef-AP)</i>.</p> <p>See Appendix 4 for details on the supplemental materials stakeholders can submit to data service providers.</p> <p>Verra will make jurisdictional information available as it is developed. In addition, project proponents can still do their own due diligence as they have been.</p> <p>Finally, Verra is currently developing a fee structure to determine the cost of AD generation and allocation to projects. Our plan is to achieve an equitable cost-sharing fee structure that will impose a low financial burden on most projects compared to the way they generate AD at present.</p> |
| Aster Global Assessment | <p>The assessment team does not have a version of the UDef-RP nor the UDEF-AP. As such the assessment team cannot determine whether the changes made are sufficient to address the commenter's concern.</p> |

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| | <p>The methodology developer referenced the commenter to Appendix 4. The assessment team reviewed Appendix 4 and it is unclear how it addresses the commenter's concern on risk map generation.</p> <p>The methodology developer responded to the last concern of the commenter by noting that Verra is currently developing a fee structure. Several comments have raised questions about fees. Given that Verra has already set expectations (as referenced by comment), the assessment team asks Verra to respond with more specificity.</p> |
| Aster Global Initial Findings | <p>CL: In line with other findings, please provide the assessment team with copies of the current UDEF-RP and UDEF-AP.</p> <p>CL: Please provide a direct response to the commenter's concern on risk map generation.</p> <p>CL: Please provide a more specific response regarding the fee structure.</p> |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Risk mapping and allocation are innovative approaches that are to-date undocumented in scientific literature. The latest versions of the <i>UDef-RP</i> and the <i>Unplanned Deforestation Activity Data Allocation Procedure (UDef-AP)</i> take into account the results of extensive testing by Clark Labs and other stakeholders.</p> <p>See Appendix 4 for details on the supplemental materials stakeholders can submit to data service providers including materials to create alternative risk maps.</p> <p>The fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects.</p> <p>Explanation of original Verra response: We have added a more explicit reference to the commenter's concern on risk map generation.</p> <p>We cannot be more specific with respect to the fee schedule response at this time.</p> <p>Response to additional points raised by Aster: CL1 The tools have now been shared; they are out of scope of Aster's assessment</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Risk mapping and allocation are innovative approaches that are to-date undocumented in scientific literature. The latest version of VT0007 s of the UDef-RP and the Unplanned Deforestation Risk Mapping and Activity Data Allocation Tool Procedure (UDef-RATP) take into account the results of extensive testing by Clark |

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| | <p>Labs and other stakeholders.</p> <p>See AUDef Appendix 4 for details on the supplemental materials stakeholders can submit to data service providers including materials to create alternative risk maps.</p> <p>The fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 325 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Terra Global Capital, LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>These proposed changes will irreparably damage the market Terra Global understands and appreciates Verra’s goal to ensure that AUDD project’s generate high integrity VCUs and the goal to ensure that the approved methodologies are not subject to gaming by project developers or their results subject to scrutiny of the press. Verra has now undertaken this lengthy process of seeking to “address” the real and perceived “problems” with AUDD methodologies. But the Verra proposed changes that do not achieve the stated goals and by taking these actions Verra will cause irreparable damage to the market and not address some of the real issues which are 1) the lack of capacity within the approved VVBs and 2) a standard that allows projects to freely fire a VVBs when the developer does not like their findings.</p> <p>Verra and the consulting team held “consultations” but even based on very negative feedback provided early-on about to this approach provided by large market participants who are developing and financing projects and programs these are not reflected in the proposed approach, in fact just the opposite. From all indications, Verra seems to be moving forward with these draconian changes even in the absence of the highly negative feedback and the irreparable impact this will have the climate finance for NBS projects and programs globally. We implore you not to adopt this unproven approach, that hides behind the “cloak” of having more environmental integrity than current AUDD methods when there is no evidence that this will be the case and in fact actually the opportunity is likely to occur. At a high level, adopting the proposed approach will:</p> <ul style="list-style-type: none"> • Take years of experience and proven technologies that has been used under project methodologies and throw it out for unworkable and/or unproven methods for developing Activity Data • Require use of JNR 4.0 which has not been successfully used by one jurisdiction OR • Require use of Activity data that does not follow JNR baseline rules and will likely be produced by an unproven AD provider without the critical local knowledge to properly train models • Introducing higher costs for the inclusion of degradation because the developer pays Verra for DF AD and to include DG they must create their own AD. • Introduce great risk of inaccuracies for the inclusion of degradation because the DF AD methods and the DG AD methods will not be aligned creating potential double counting or missing transitions (degradation is key as is can account for more than 30% of emissions) • Require the application of a simplistic risk tool which has which is untested and relies on only one explanatory variable, forest density, when it is proven that there a number |

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| | <p>of other key (often landscape specific) variables to explain deforestation risk.</p> <ul style="list-style-type: none"> • Through the application of this simplistic risk tool which determines which projects get what portion of the baseline this will create wealth transfer between different projects due to the lack of robust baseline spatial allocation methods. |
| Proposed Change(s) | Do not implement these changes as is. But create set of reference region requirements to be used by all AUDD, and require that AD must be VVB approved and have a 2nd Verra Approval on all RR and AD. If Verra wants to use outside experts to support them they can. |
| Verra Response | <p>Thank you for sharing these concerns. We hope that some of them, at least, have been allayed through further engagement and development of the methodology since these comments were submitted.</p> <p>Verra is addressing the concerns raised about VVB quality and use.</p> |
| Aster Global Assessment | It is unclear how the methodology developer's response addresses the commenter's concerns. |
| Aster Global Initial Findings | CL: Please provide responses to each of the commenter's concerns and how the revisions to the methodology/module address them. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: While several large developers have not supported this approach, overall the feedback has been very positive. One main reason for this is that the new approach ensures the total allocated deforestation does not add up to more than has occurred in the entire jurisdiction and will be more consistent with national accounting (compared to the reference region approach). This can't be done with the reference region approach. This approach also ensures reduced conflict of interest. This approach is also designed to ensure a balance of integrity and implementability.</p> <p>Degradation will be added to the new methodology in the next phase.</p> <p>Response to additional points raised by Aster: Philosophical arguments about scale of accounting are out of scope.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>While several large developers have not supported this approach, overall the feedback has been very positive. One main reason for this is that the new approach ensures the total allocated deforestation does not add up to more than has occurred in the entire jurisdiction and will be more consistent with national accounting (compared to the reference region approach). This can't be done with the reference region approach. This approach also ensures reduced conflict of interest. This approach is also designed to ensure a balance of integrity and implementability.</p> <p>Degradation will be added to the new methodology in the next phase.</p> |

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| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 326 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Terra Global Capital, LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Verra Motivation and Business Model This approach deeply concerns Terra about Verra's business model and the independence and commitment of Verra to running a third-party standard. Is Verra seeking a new revenue source? Verra is proposing taking on new activities for which it has no experience when it is still struggling to properly run the standard under the demands of the current market. Verra should be focused on improving the standard and strengthening the validation and verification process. As well as having the capacity to process the many projects coming to market. Now is not the time, when the standard is struggling to function properly under its program requirements. |
| Verra Response | Verra will use diverse data service providers to develop and allocate activity data. That data will be assessed by third-party independent experts. Development of this consolidated methodology and the ongoing allocation of activity data is an expensive proposition for Verra. As a non-profit organization, we look to cover our costs in the long-term but in the short term are more concerned with transitioning projects quickly to this new methodology. |
| Aster Global Assessment | The commenter raised concerns regarding Verra's role as a third party due to the involvement of Verra in the methodology process. The methodology developer responded by noting that data will be assessed by third-party experts. However, the assessment team is uninformed on the assessment process as they have not been provided versions of UDEF-AP or UDefRP. It is unclear how the second portion of the response addresses the commenter's concern. |
| Aster Global Initial Findings | CL: In line with other findings, please provide the assessment team with copies of the current UDEF-RP and UDEF-AP. CL: Please clarify how the second portion of the response addresses the commenter's concern. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: Development of this consolidated methodology and the ongoing allocation of activity data is an expensive proposition for Verra. As a non-profit organization, we look to cover our costs in the long-term but in the short term are more concerned with transitioning projects quickly to this new methodology. Verra will use diverse data service providers to develop and allocate activity data. That data will be assessed by third-party independent experts. Verra is also working on improving the validation and verification process. Many updates are underway and will be announced soon. Capacity and internal process are also being improved to increase efficiency. Explanation of original Verra response: Verra is clearly not seeking additional |

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| | <p>revenue sources, but rather a consistent approach that removes COI in the development of baselines. This approach will not generate additional revenue for Verra, but will increase Verra's costs (for which fees will be charged to cover).</p> <p>Response to additional points raised by Aster: The UDEF-RP and UDEF-AP have been provided to Aster.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>Development of this consolidated methodology and the ongoing allocation of activity data is an expensive proposition for Verra. As a non-profit organization, we look to cover our costs in the long-term but in the short term are more concerned with transitioning projects quickly to this new methodology. Verra will use diverse data service providers to develop and allocate activity data. That data will be assessed by third-party independent experts.</p> <p>Verra is also working on improving the validation and verification process. Many updates are underway and will be announced soon. Capacity and internal process are also being improved to increase efficiency.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 327 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Terra Global Capital, LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | If you implement these proposed changes now you will cause a huge outflow of climate finance in the NBS pipeline. Take the smaller steps we suggested to address VVB capacity and standardize reference regions across methodologies, as well as increase the scrutiny on reference regions and AD that are developed by the project to require VVB and Verra approval. This should be your first step, while you regroup and make sure that there is side by side proof that these significant proposed changes will produce a better results then the simpler adjustments that can be made. |
| Verra Response | <p>We hope we are doing a good enough job communicating with the market to avoid massive outflows; in fact, we hope that projects using the new methodology will inspire renewed confidence in REDD.</p> <p>Verra is addressing the concerns raised about VVB quality.</p> |
| Aster Global Assessment | It is unclear how the methodology developer's response addressed the comment. |

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| Aster Global Initial Findings | CL: Please clarify how due account of the comment was taken. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The new approach has been well received by most actors as producing higher-quality and more robust results that ensure all activities within a jurisdiction are consistently nested, aligned with and will not exceed national results. These updates should in fact increase investment to the space as we deliver higher-quality results.</p> <p>Response to additional points raised by Aster: This is a philosophical comment beyond the scope of this review.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The new approach has been well received by most actors as producing higher-quality and more robust results that ensure all activities within a jurisdiction are consistently nested, aligned with and will not exceed national results. These updates should in fact increase investment to the space as we deliver higher-quality results. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 328 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Ecológica Assessoria |
| Reviewer Country | Brazil |
| Response(s) - including general questions & comments | Opening roads is one of the main drivers of deforestation in Brazil. In addition to real estate speculation, mining, population growth and political scenario.(see photos in rows below, 1986, 2000, 2011, 2020) |
| Proposed Change(s) | Opening roads is one of the main drivers of deforestation in Brazil. In addition to real estate speculation, mining, population growth and political scenario. |
| Verra Response | See Appendix 4 for details on the supplemental materials stakeholders can submit to data service providers so that they can be used in constructing alternative maps using <i>UDef-RP</i> . |
| Aster Global Assessment | It is unclear how the methodology developer's response addresses the comment. |
| Aster Global Initial Findings | CL: Please clarify how due account of the comment was taken. |

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| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: The commenter suggests that these factors influence risk maps. They can indeed be included in alternative risk mapping approaches that will be compared to the benchmark. See Appendix 4 for details on the supplemental materials stakeholders can submit to data service providers so that they can be used in constructing alternative maps using UDef-RP. |
| Aster Global Findings Round 2 | The revised comment provided by the methodology developer provides additional information sufficient to close the identified finding. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The commenter suggests that these factors influence risk maps. They can indeed be included in alternative risk mapping approaches that will be compared to the benchmark. See AUDef Appendix 4 for details on the supplemental materials stakeholders can submit to data service providers so that they can be used in constructing alternative maps using UDef-RATP. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 329 |
| Question | General |
| Section | Incorporation of forest degradation as part of standard methodology |
| Reviewer Organization | Equinor |
| Reviewer Country | Norway |
| Response(s) - including general questions & comments | <p>Verra's current proposal for benchmark methodology is based on the JNR Risk Mapping Tool. Since the tool will assign the highest scores (highest risks) in forests in geographical proximity to high deforestation activity, that in practice will prioritize avoiding deforestation over forest degradation. While we understand that the proposed revision allows for claiming credits for avoiding forest degradation using existing methodologies, there is a high risk that project developers, faced with a standardized, simplified benchmark methodology for deforestation on one hand, and a more complex, custom approach to address forest degradation, will predominantly focus on deforestation and deprioritize forest degradation.</p> <p>This would be unfortunate for several reasons. We believe that de-prioritization of forest degradation will have negative effect on biodiversity and carbon stock. Forest degradation is a stepping-stone to deforestation, it is therefore important to protect areas in the forest margin suffering from early-stage degradation to prevent deforestation. Further, the impact of forest degradation on emissions is perceived in many cases to be greater than deforestation; and finally, forest degradation has a major impact on biodiversity</p> |
| Proposed Change(s) | Recommendation: Equinor recommend that activity maps should include degradation as well as deforestation; similarly, FREL Maps should be accurate enough to include the impact of degradation; and the risk tool should reward projects addressing the onset of degradation. |
| Verra Response | AUDef is only applicable to deforestation. An unplanned forest degradation module is envisioned at a later stage. In the VCS Program, planned forest degradation is an improved forest management activity. We hope that the need to use current |

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| | methodologies to account for forest degradation until the UDeg module is added to M0184 may discourage too many from doing so. |
| Aster Global Assessment | The methodology developer took due account of the comment and informed that additional modules will be added in future to address unplanned forest degradation. Additionally, it is stated that projects may choose to apply other approved VCS methodologies for project activities not covered by this methodology (e.g., improved forest management category of methodology for avoiding planned forest degradation) until module for degradation is added to this methodology. However, it is unclear to the assessment team how the methodology developer's response addresses the recommendation proposed by the commenter. |
| Aster Global Initial Findings | CL: Please clarify in line with the commenter's recommendation. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The commenter suggests a specific way to include degradation. AUDef is only applicable to deforestation. An unplanned forest degradation module is envisioned at a later stage. In the VCS Program, planned forest degradation is an improved forest management activity, and can be accounted under those methodologies.</p> <p>Response to additional points raised by Aster: Degradation is out of the scope of this module. The specific approach to degradation and/or addressing it in the risk tool is therefore not possible to answer at this point in time and is outside the scope of the review.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The commenter suggests a specific way to include degradation. AUDef is only applicable to deforestation. An unplanned forest degradation module is envisioned at a later stage. In the VCS Program, planned forest degradation is an improved forest management activity, and can be accounted under those methodologies. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 330 |
| Question | General |
| Section | Use of factor maps in areas of accelerating deforestation |
| Reviewer Organization | Equinor |
| Reviewer Country | Norway |
| Response(s) - including general | History-based risk maps will generally have validity, at least over relatively short time periods in predicting future forest destruction. However, there is also strong evidence that accelerating rates of encroachment into forests will not be captured by such a standardized approach, especially when the standard is based on deforestation risk |

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| questions & comments | maps in which the main input will be historical deforestation rates. While there have been cases of misuse of factor maps to predict deforestation and degradation and that has impacted market credibility, it is also clear that mapping and addressing future threats is an essential part of forest protection. Brazil provides an illustration, where hidden roads, water access, illegal logging/mining activities and illegal land claims in the |
| Proposed Change(s) | We believe Verra should remain open to the use of factor maps in areas of accelerating degradation. Use should be audited by high quality independent auditors |
| Verra Response | The benchmark approach in the revised <i>UDef-RP</i> is based on distance to nearest forest edge. However, competing maps may be generated and can include other factors (including those submitted by stakeholders, as set out in Appendix 4). |
| Aster Global Assessment | The assessment team does not have a version of the UDef-RP. As such the assessment team cannot determine whether the changes made are sufficient to address the commenter's concern. |
| Aster Global Initial Findings | CL: Please provide the assessment team with a copy of the current UDEF-RP. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Stakeholders can submit alternative mapping approaches. The benchmark approach in the revised UDef-RP is based on distance to nearest forest edge. However, competing maps may be generated and can include other factors (including those submitted by stakeholders, as set out in Appendix 4).</p> <p>Response to additional points raised by Aster: The UDEF-RP has been shared with Aster.</p> |
| Aster Global Findings Round 2 | The revised comment provided by the methodology developer provides additional information sufficient to close the identified finding. The UDEF-RP tool has been provided. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Stakeholders can submit alternative mapping approaches. The benchmark approach in the revised UDef-RATP is based on distance to nearest forest edge. However, competing maps may be generated and can include other factors (including those submitted by stakeholders, as set out in AUDef Appendix 4). |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 331 |
| Question | General |
| Section | Adequately rewarding successful projects in consecutive validity periods |
| Reviewer Organization | Equinor |
| Reviewer Country | Norway |
| Response(s) - including general questions & comments | If a project performs well – meaning it is effective in reducing deforestation in the project area/leakage belt – this would trigger less modelled risk in upcoming validity periods, and hence lower payments. This will likely have a negative impact on project feasibility and investor appetite. |

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| Proposed Change(s) | This should be addressed in the methodology, potentially by stringent use of baseline methods using reference areas calibrated against relevant baselines which would capture the real contribution of projects to forest protection. |
| Verra Response | The benchmark approach in the revised <i>UDef-RP</i> is based on distance to nearest forest edge. However, competing maps may be generated and can include other factors (including those submitted by stakeholders, as set out in Appendix 4). |
| Aster Global Assessment | The assessment team does not have a version of the UDef-RP. As such the assessment team cannot determine whether the changes made are sufficient to address the commenter's concern. |
| Aster Global Initial Findings | CL: Please provide the assessment team with a copy of the current UDEF-RP. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The original comment suggests not using the proposed allocation approach, but rather continuing to used the old reference region approach to methodologies. However, it is widely accepted at this point that such methodologies are inadequate to ensure accounting 'adds up' at the national level and produces a consistent approach to nesting. This is a philisophical debate outside the scope of the methodologies.</p> <p>Verra is aware of the potential long-term decline in allocation in future periods and will continue to explore ways to address this issue appropriately.</p> <p>Explanation of original Verra response: The original comment was erroneously added here and is not relevant.</p> <p>Response to additional points raised by Aster: Verra has provided the tools to Aster.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>The original comment suggests not using the proposed allocation approach, but rather continuing to used the old reference region approach to methodologies. However, it is widely accepted at this point that such methodologies are inadequate to ensure accounting 'adds up' at the national level and produces a consistent approach to nesting. This is a philisophical debate outside the scope of the methodologies.</p> <p>Verra is aware of the potential long-term decline in allocation in future periods and will continue to explore ways to address this issue appropriately.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 332 |
| Question | General |
| Section | Potential conflicts between Verra and National FREL estimates |

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| Reviewer Organization | Equinor |
| Reviewer Country | Norway |
| Response(s) - including general questions & comments | New baselines which Verra create for the revised AUDD standard may conflict with existing jurisdictional FRELS (e.g., as part of their NDC). Existing FRELS are not created using standard methodology and may not be compliant with Verra's requirements, but nevertheless continue to be used by the jurisdictions in question. This will cause clear issues for any projects nested within those jurisdictions (conflicts with local authorities, tax authorities; unclear credit contributions) which could lead to delays and increased investor uncertainty associated with these projects. |
| Proposed Change(s) | We would be interested in hearing Verra's proposed solution here. Will there need to be delay in applying Verra's revised guidelines until FREL's are aligned? |
| Verra Response | AD that meets Verra's criteria from official FRELS will gladly be used (where it is accessible). Where Verra needs to construct alternate data, projects may need to limit VCU issuance to the amount authorized by the jurisdictional government. This will vary by jurisdiction. |
| Aster Global Assessment | It is unclear if the methodology developer's response is a "proposed solution" as requested by commenter. |
| Aster Global Initial Findings | CL: Please clarify in line with the commenter's question. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: AD that meets Verra's criteria from official FRELS will gladly be used or adapted (where it is accessible), and this will be used for allocation (where possible). Verra recognizes that this may result in slightly different results from the official FREL. Where governments have determined not only a FREL but also an allocation approach (or other benefit sharing that would determine a project baseline/allocation or "maximum mitigation potential"), the Verra allocation and the derived project-developed baseline will serve as a cap to what Verra will issue the project. Should a government approach result in higher crediting, they may handle that as the government sees fit (through additional sharing of benefits or credits), but this will not raise the number of VCUs that can be issued. Where a government crediting level would be lower than the Verra crediting level, and there are clear policies/regulations that establish this, such government maximum credit issuance will be respected by Verra. It is not credible for Verra to simply take whatever the jurisdiction has done without ensuring that it meets standards. |
| Aster Global Findings Round 2 | The methodology developer has provided additional clarification in their revised response, sufficient to close the identified finding. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | AD that meets Verra's criteria from official FRELS will gladly be used or adapted (where it is accessible), and this will be used for allocation (where possible). Verra recognizes that this may result in slightly different results from the official FREL. Where governments have determined not only a FREL but also an allocation approach (or other benefit sharing that would determine a project baseline/allocation or "maximum mitigation potential"), the Verra allocation and the derived project-developed baseline will serve as a cap to what Verra will issue the project. Should a government approach |

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| | <p>result in higher crediting, they may handle that as the government sees fit (through additional sharing of benefits or credits), but this will not raise the number of VCUs that can be issued. Where a government crediting level would be lower than the Verra crediting level, and there are clear policies/regulations that establish this, such government maximum credit issuance will be respected by Verra.</p> <p>It is not credible for Verra to simply take whatever the jurisdiction has done without ensuring that it meets standards.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 333 |
| Question | General |
| Section | Addressing the role played by VVBs |
| Reviewer Organization | Equinor |
| Reviewer Country | Norway |
| Response(s) - including general questions & comments | There is large variation in the quality and additionality of credits within projects that have been certified to adhere to Verra's methodology requirements. This can be addressed by two changes. VVB's should be given a clear mandate to assess the overall additionality of project credits. In addition, Verra should re-qualify VVB's, with a prejudice to use of well financed, independent, high quality internationally renowned bodies. In our view there is no conflict of interest between high standard verification agencies and high-quality developers, all of whom will have the common aim of creating a high integrity market |
| Proposed Change(s) | Recommendation: Verra strengthens the mandate of VVB's and requalifies VVB's |
| Verra Response | Verra has a new Audit and Accreditation team that is tackling the issue of VVB quality and increasing the number of qualified VVBs. |
| Aster Global Assessment | The commenter expressed concern regarding quality of VVBs. The methodology developer took due account by clarifying an audit and accreditation team is working on this issue. However, it is unclear how the methodology developer's response address the commenters suggestion of VVB's given clear mandate to assess additionality of project credits. |
| Aster Global Initial Findings | CL: Please clarify in with the commenter's question. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: Additionality rules are in the methodology, which is then applied to the project. These, like everything else, will be appropriately reviewed by VVBs, which do already have this mandate. In addition, training will provided on the new methodolly to VVBs. Verra also has a new Audit and Accreditation team that is tackling the issue of VVB quality and increasing the number of qualified VVBs. |
| Aster Global Findings Round 2 | The methodology developer's response adequately addresses the commenters concern of additionality and qualified VVBs. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra | Additionality rules are in the methodology, which is then applied to the project. These, like everything else, will be appropriately reviewed by VVBs, which do already have this |

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| Response October 2023 | mandate. In addition, training will provided on the new methodolly to VVBs. Verra also has a new Audit and Accreditation team that is tackling the issue of VVB quality and increasing the number of qualified VVBs. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 334 |
| Question | General |
| Section | Phased approach to introducing new changes, including commercial pilots |
| Reviewer Organization | Equinor |
| Reviewer Country | Norway |
| Response(s) - including general questions & comments | Verra proposes complex changes at a time when the industry is capacity constrained. Activities like creating the FCBM's, Risk maps, Forest Strata and Substrata maps and allocating jurisdictional baseline activity data over a wider range of jurisdictions – in addition to building the capacity in the sector to audit the resulting products – will take significant time and adaptation. The comprehensive nature of the changes also adds significant risk for project developers as the outcome of the certification process will be (at least initially) very uncertain, making it difficult to commit to new investments, delaying urgent action on deforestation and forest degradation. |
| Proposed Change(s) | We recommend a commercial pilot of the revised methodology in one or two jurisdictions (one with a pre-existing FREL and one where Verra generate the jurisdictional activity data), which would incorporate degradation measurements. We also suggest that during the roll-out, the changes are phased over different jurisdictions, to allow sufficient time for development and audit of the necessary tools. The outcomes of the pilots and each phase of the roll-out should be communicated transparently to the entire stakeholder group, to minimize the uncertainty faced by project developers; feedback from each of the pilots should be considered for potential refinements to the new methodology (example process illustrated below). Until the new methodology is final and fully rolled out, we suggest project developers are enabled to continue implementing projects using existing methodologies, with credits from projects developed in this interim period treated on par with credits from projects developed using the new approach. |
| Verra Response | Verra has tested individual elements of the methodology, the <i>UDef-RP</i> and the <i>UDef-AP</i> extensively. Verra is currently developing activity data for 12 initial jurisdictions; these will be the first to have projects with allocated data. In other jurisdictions, projects may continue to use the existing methodologies, as the commenter suggests, until AD is available for six months. |
| Aster Global Assessment | It is unclear how testing of individual elements of the methodology and tools addresses the commenter's recommendation of a commercial pilot of the methodology in another jurisdiction. Further, it is unclear what the testing referred to the methodology developer entails. The methodology developer references the grace period as already defined by Verra rather than the commenter's proposed grace period depending on successful rollout of the methodology. |
| Aster Global Initial Findings | CL: Please clarify what the referenced testing entailed, and how it satisfies the commenter's recommendation of a commercial pilot. CL: Please clarify how due account was taken of the commenter's concern regarding the grace period. |

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| <p>Round 1 Response from Methodology Developer</p> | <p>Revised Verra comment addressing original public comment: Verra has tested individual elements of the methodology, the UDef-RP and the UDef-AP extensively.</p> <p>Verra is currently developing activity data for 12 initial jurisdictions; these will be the first to have projects with allocated data. In other jurisdictions, projects may continue to use the existing methodologies, as the commenter suggests, until AD is available for six months.</p> <p>It has been concluded that this is the most robust option at this time that also ensures harmonization with national accounting. The new methods are designed to prevent inflation in the sector. Further testing will happen via comparison of risk maps as part of the process.</p> <p>The transition to this new methodology has been underway for more than two years. We will not be changing the grace period, as it is essential for market credibility to shift to the new approach.</p> <p>Response to additional points raised by Aster: Verra is not required to publish testing and does not see how a "commercial pilot" would be different than the phased implementation that is already underway. We do not believe that a further grace period would be credible.</p> |
| <p>Aster's initial response is in/out of scope for VVB review</p> | <p>out of scope</p> |
| <p>Aster Global Findings Round 2</p> | <p>Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team.</p> |
| <p>Status</p> | <p>closed R2</p> |
| <p>Response Updated Since Finding Closed?</p> | <p>wording/typo updates</p> |
| <p>Revised Verra Response October 2023</p> | <p>Verra has tested individual elements of the methodology and the UDef-RATP and the UDef-AP extensively.</p> <p>Verra is currently developing activity data for 12 initial jurisdictions; these will be the first to have projects with allocated data. In other jurisdictions, projects may continue to use the existing methodologies, as the commenter suggests, until AD is available for six months.</p> <p>It has been concluded that this is the most robust option at this time that also ensures harmonization with national accounting. The new methods are designed to prevent inflation in the sector. Further testing will happen via comparison of risk maps as part of the process.</p> <p>The transition to this new methodology has been underway for more than two years. We will not be changing the grace period, as it is essential for market credibility to shift to the new approach.</p> |
| <p>Aster Global Assessment of Revised Response</p> | <p>The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required.</p> |
| <p>Comment #</p> | <p>335</p> |

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| Question | General |
| Section | Effective date of new modules and grace periods for projects under development. |
| Reviewer Organization | Kennemer Eco Solutions |
| Reviewer Country | Philippines |
| Response(s) - including general questions & comments | <p>We would ask Verra to kindly clarify the effective date of the new modules and grace periods for projects under development with the old AUDD baseline methodologies.</p> <p>Very specifically, because clarity is highly relevant here: At the effective launch date of the new modules, what does a VCS AUDD project need to show in order to be eligible for the grace period and to continue towards validation under the previous rules? Is it: VCS Pipeline listing as under development with a VCS Draft PDD Proof of contracting a VVB for validation Proof of initiating VCS validation process Because it is very important to clarify which one it is, or which multiple parts are required, by which time.</p> <p>We understand that after first baseline period and with baseline update for 2nd monitoring period, all projects will have to apply the new modules.</p> |
| Verra Response | See the Verra website post Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits for information on projects' transition to the new methodology. |
| Aster Global Assessment | The methodology developer took due account of the commenter's question by pointing them to a Verra website post. The assessment team reviewed the post and determined it contains sufficient information explaining the transition process. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | See comment #304 |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 336 |
| Question | General |
| Section | VCS REVISION TO STANDARDIZE COMPONENTS OF AVOIDING UNPLANNED DEFORESTATION METHODOLOGIES: Problem Statement |
| Reviewer Organization | ICROA |
| Reviewer Country | Switzerland |
| Response(s) - including general questions & comments | Verra embarked on a mission to establish a system of high-quality baselines at all scales. While this is certainly the right ambition, the way Verra goes about this complex task is potentially jeopardizing country sovereignty and putting project viability and market growth at risk. It is widely accepted that one desirable future for REDD+ will involve national REDD+ programs integrated into National AFOLU commitments under the Paris Agreement, with all current and future REDD+ project activity within each country "nested" into the national program. This will ensure the environmental |

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| | <p>integrity of performance claims at different scales within the country. Some years ago - to address the transition to nested REDD+ - Verra, whose VCS project standard has been used for the great majority of REDD+ projects active in the VCM today, initially developed the VCS Jurisdictional & Nested REDD+ (JNR) Standard as a way to support countries (or sub-national areas such as states) interested in having an independent standard verify performance and create market assets at both jurisdictional and project scales. After several years (in which there have been no implementations of VCS/JNR Programs that we are aware of) and possibly in the face of increasing press criticism of the variety of project approaches allowed under the VCS Standard, Verra has chosen to undergo a process of consolidating project-level methodologies under the VCS Standard (introduction of new modules and adaptation of current methodologies for unplanned deforestation and degradation). We have several concerns about the proposed methodological adaptation process, detailed as follows, along with suggested solutions:</p> |
| Verra Response | N/A |
| Aster Global Assessment | No response required. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | N/A |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 337 |
| Question | General |
| Section | VCS REVISION TO STANDARDIZE COMPONENTS OF AVOIDING UNPLANNED DEFORESTATION METHODOLOGIES: Concern 1.1 |
| Reviewer Organization | ICROA |
| Reviewer Country | Switzerland |
| Response(s) - including general questions & comments | <p>Concern 1</p> <p>Verra has proposed that the methodological adaptation process will apply the principles of VCS JNR to determine nested reference levels for all VCS Projects, even in countries that are not implementing VCS/JNR, and even if a national government has their own established approach for that process. While we accept the premise of moving to a nested system, and believe that methodological consolidation would lead to higher consistency in project baselines (baselines are the most often contested element of project “quality”), we believe the way Verra is proposing to go about this creates a number of issues that could harm the REDD+ market.</p> <p>1. This is potentially putting Verra at odds with sovereign national REDD+ nesting systems, especially the more advanced of those systems that have their own nesting approach, sometimes in law. To date, Verra has shown an unwillingness to allow VCS projects to follow sovereign rules/laws for their national nesting systems and instead has decided Verra will calculate their own proprietary default nested reference levels for all VCS</p> |

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| | <p>projects¹, regardless of whether the country implements a VCS JNR program or not. Verra has indicated their reasoning for this decision is: a) To ensure jurisdictional baselines – and by extension nested project baselines - are of sufficient “quality”. b) To provide a default nested baseline for projects in countries that do not have a national nesting approach or lack a national baseline that meets Verra’s credibility requirements.</p> <p>Jurisdictional baseline allocation is a 2-part process, involving a risk map and FREL allocation. Verra had initially indicated that they might allow countries to develop their own deforestation risk maps, but only if the countries could prove they were of higher quality than Verra’s default. Verra has not, however, provided clear, actionable comparison criteria that allows for meaningful comparison of alternatives to Verra’s default risk mapping methodology. For example, Verra requires that all alternative risk maps contain an insignificant Risk Class (“0” Risk Class), which would render any country’s Risk Map that did not support this design philosophy ineligible for comparison. We suggest that by not providing objective, universally applicable comparison criteria, Verra has for all intents and purposes made it impossible to propose an alternative to their default, unless the alternative shares Verra’s design approach. Additionally, in all cases, countries must use Verra’s JNR baseline calculation / allocation tool to allocate nested project baselines. This applies even if a national REDD+ program has a high-quality allocation tool of their own. This guarantees that Verra’s VCS JNR allocation approach, which includes discounting for uncertainty and bias, will always be out of sync with national REDD+ results.</p> <p>While we agree with the importance of applying the highest quality jurisdictional baseline to nested REDD+ projects, Verra has to date been unable to successfully demonstrate a quality comparison of any alternative jurisdictional / national baseline to its VCS JNR defined default, essentially leading to a situation where the Verra-calculated baseline is assumed to be the most accurate option, without validating this assumption. We feel that denying the use of National REDD+ program data in VCM nested projects is sending the wrong message to host countries and not encouraging them to improve the quality of their data in order to be able to participate in the VCM. We therefore request that Verra include the option to allocate national / jurisdictional FRELS should they meet a specifically defined quality threshold. We further suggest that universally applicable, objective comparison criteria are used to compare alternative Risk Maps to Verra’s default.</p> <p>¹ Verra could accept the national FRELS approved by UNFCCC (or suggest data quality analysis on top of the current FREL data). Some countries have not disclosed the underlying data used to calculate their FREL – which means that it is not possible for a third party to calculate and get to the same results. In these situations, Verra tools could be applied to calculate (or adjust) the FREL and allocated baselines.</p> |
| Proposed Change(s) | <p>Verra maintains the VCS JNR allocation tool as a default, but Verra establishes an absolute level of accuracy measured using traditional remote sensing methods common to most National REDD+ programs that is acceptable for alternative approaches. If the accuracy of the alternative baseline allocation model is shown to be equal to or exceed the Verra accuracy threshold, it should be authorized by Verra to be used to allocate nested baselines to VCS nested projects, in accordance with the relevant host country’s regulations. We further suggest that countries should be able to use their own allocation tools if the above-mentioned accuracy criteria are met.</p> |
| Verra Response | <p>The <i>UDef-RP</i> is currently being revised; the new version includes a clear statistical process to compare the Verra benchmark risk map with any other risk map.</p> <p>In certain cases, we are analyzing UNFCCC-vetted FRELS to see if they meet our</p> |

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| | <p>criteria or could be appropriately discounted.</p> <p>Verra will consider government allocation approaches on a case-by-case basis if they are willing to allocate FRELS or activity data that meets Verra requirements.</p> |
| Aster Global Assessment | <p>The assessment team does not have a version of the UDef-RP. As such the assessment team cannot review the referenced statistical process.</p> <p>The assessment team believes the response provided is incomplete given the breadth of the comment. The assessment team is requesting further elaboration to address the concerns raised by the commenter.</p> <p>Further it appears there are issues being discussed internally by Verra that may or may not need to be formalized by the end of the methodology assessment process. Please clarify.</p> |
| Aster Global Initial Findings | <p>CL: Please provide the assessment team with a copy of the current UDEF-RP. CL: Please clarify in line with assessor findings.</p> |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: With respect to the use of government FREL and allocation, Verra's methods will constrain what Verra is willing to credit; any additional benefit sharing is up to negotiation with government; any policy-based restrictions will also be enforced on top of Verra accounting (e.g., limits on issuance that may be regulated by government.). Clarification will be added to the standard and this is out of scope of the methodology as it will not impact accounting under the methodology.</p> <p>Further elaboration of the risk mapping process will be published soon.</p> <p>Response to additional points raised by Aster: UDEF-RP has been provided to Aster.</p> |
| Aster's initial response is in/out of scope for VVB review | <p>out of scope</p> |
| Aster Global Findings Round 2 | <p>Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team.</p> |
| Status | <p>closed R2</p> |
| Response Updated Since Finding Closed? | <p>wording/typo updates</p> |
| Revised Verra Response October 2023 | <p>With respect to the use of government FREL and allocation, Verra's methods will constrain what Verra is willing to credit; any additional benefit sharing is up to negotiation with government; any policy-based restrictions will also be enforced on top of Verra accounting (e.g., limits on issuance that may be regulated by government.). Clarification will be added to the Standard and this is out of scope of the methodology as it will not impact accounting under the methodology.</p> <p>Further elaboration of the risk mapping process will be published soon. The updated VT0007 will be published with the methodology.</p> |

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| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 338 |
| Question | General |
| Section | VCS REVISION TO STANDARDIZE COMPONENTS OF AVOIDING UNPLANNED DEFORESTATION METHODOLOGIES: Concern 1.2 |
| Reviewer Organization | ICROA |
| Reviewer Country | Switzerland |
| Response(s) - including general questions & comments | <p>Verra's ability to obtain national scale activity data (e.g. forest loss) and to run their default VCS JNR deforestation risk map and allocation / baseline calculation tool is a possible bottleneck to progress in the VCM:</p> <p>a) It is no secret Verra has neither the capacity, nor the expertise to undertake such a task today, and we are concerned that Verra has underestimated both the cost and time required to conduct this work to meet current and future market demand for credit supply. Verra has estimated a cost of approximately \$50K for a consultancy to calculate activity data for each Jurisdiction, and that they plan to pass this cost to the project development community.</p> <p>b) Considering the importance of activity data in the construction of jurisdictional and project baselines, projects will only have inputs to assess their feasibility at a very late development stage, only after Verra is able to employ a consultancy to calculate and provide this information triggered by the request of a project.</p> <p>c) We are also concerned that Verra is overestimating the availability of national scale data that meets their JNR requirements today, and if that is true, it may not be possible for Verra to produce default jurisdictional baseline results for many countries.</p> |
| Proposed Change(s) | If, on the other hand, the alternative method yields a lower accuracy than the Verra-established threshold, and results in a less conservative baseline for a project than that calculated using the Verra default VCS JNR approach, Verra could either require the project baseline be established using their default approach or that the baseline calculated using their default approach be the "maximum mitigation potential (MMP)" for VCS nested projects, above which the projects would be ineligible for VCS crediting. Decisions would have to be made as to how Verra would address the host country authorizing any residual performance of the project above the Verra MMP to be sold under a different standard. |
| Verra Response | <p>Verra now understands better both the time and cost of developing activity data and risk maps and is building the capacity to complete this for all current jurisdictions by the end of 2024.</p> <p>We maintain that data is available at a jurisdictional level that meets the requirements set out in Appendix 1. Where it is not available, we will use appropriate discount factors.</p> |
| Aster Global Assessment | <p>Several commenters have also inquired about the timeliness of baseline data. Verra has stated they will be timely several times; to assuage concerns from project developers, the Assessment Team would like Verra to detail how this will be accomplished.</p> <p>Several commenters have also asked if stakeholders other than govts will inform the delineation of jurisdictions; to better address these comments, the assessment team asks Verra to explain how it may be inappropriate or unwarranted to have feedback from stakeholders other than govts.</p> |

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| Aster Global Initial Findings | CL: Please elaborate on Verra's response to this comment, in line with the finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Verra now understands better both the time and cost of developing activity data and risk maps and is building the capacity to complete this for all current jurisdictions by the end of 2024.</p> <p>We maintain that data is available at a jurisdictional level that meets the requirements set out in Appendix 1. Where it is not available, we will use appropriate discount factors. Verra will continually improve on process and timing.</p> <p>Stakeholders are able to contribute data to the process.</p> <p>Response to additional points raised by Aster: This comment does not ask about the delineation of jurisdictional boundaries (which will be clarified with national governments, where necessary). Timing and Verra capacity are outside the scope of this review.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>Verra now understands better both the time and cost of developing activity data and risk maps and is building the capacity to complete this for all current jurisdictions by the end of 2024.</p> <p>We maintain that data is available at a jurisdictional level that meets the requirements set out in AUDef Appendix 1. Where it is not available, we will use appropriate discount factors. Verra will continually improve on process and timing.</p> <p>Stakeholders are able to contribute data to the process.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 339 |
| Question | General |
| Section | VCS REVISION TO STANDARDIZE COMPONENTS OF AVOIDING UNPLANNED DEFORESTATION METHODOLOGIES: Concern 1.3 |
| Reviewer Organization | ICROA |
| Reviewer Country | Switzerland |
| Response(s) - including general | Verra has put the validation and verification of ALL VCS nested projects on hold until they formally release their methodological consolidation guidelines. This is holding up the development of projects right now, and the uncertainty about nested project |

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| questions & comments | <p>baselines in the future is already impacting investment in the sector. This also impacts local communities and stakeholders. Verra has recently indicated that the consolidation process will not be complete until October, 2022. Verra could create a “transition period” until the updated methodologies are ready to be implemented. Project reference levels establish the maximum possible performance of any project and have been widely used as the most important metric in establishing project financing in the VCM. Therefore, after a long period of discussing with Verra these significant changes for the construction of the baselines, existing and new proponents have been navigating with high uncertainty regarding the financing feasibility of their projects</p> |
| Proposed Change(s) | <p>Verra conducts additional testing of their tool, so they are in a position to understand the consequences to the existing market and to their reputation, in the event the tool and new mandatory approach bring substantial changes to existing projects, before requiring the entire market switch to the tool as a default. Verra provides an updated calendar with the expected dates for starting to apply the VCS JNR allocation model and firmly commits with the stakeholders that that calendar will not be modified during the current year. In the meantime, the projects can continue using the current versions of methodologies and developing their reference levels using the methods established at validation.</p> |
| Verra Response | <p>See the Verra website post Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits for information on projects' transition to the new methodology.</p> |
| Aster Global Assessment | <p>It is unclear how provided response addresses the proposed change of additional testing of the tool. Additionally, it is unclear how the referenced website posts addresses the commenter's other concerns.</p> |
| Aster Global Initial Findings | <p>CL: Please clarify how due account of the comment and associated proposed change was taken.</p> |
| Round 1 Response from Methodology Developer | <p>Revised Verra response to original comment: The deforestation risk modelling and mapping procedure, as well as the allocation tool, have been thoroughly revised and reformulated and they are still being subjected to tests and improvements, prior to their formal publication. An updated timeline for the transition and adoption of the new consolidated methodology has been posted in Verra's website.</p> |
| Aster Global Findings Round 2 | <p>The revised response provided from the methodology developer now addresses the commenter's two points: testing of the tools as well as the transition period indicated on the referenced web post. This comment has been adequately addressed.</p> |
| Status | <p>closed R2</p> |
| Response Updated Since Finding Closed? | <p>wording/typo updates</p> |
| Revised Verra Response October 2023 | <p>The deforestation risk modelling and mapping procedure, as well as the allocation tool, have been thoroughly revised and reformulated as an updated VT0007 (Unplanned Deforestation Risk Mapping and Allocation Tool) and they are still being subjected to tests and improvements, prior to their formal publication. An updated timeline for the transition and adoption of the new consolidated methodology has been posted in Verra's website (see comment #304).</p> |
| Aster Global Assessment of Revised Response | <p>The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required.</p> |
| Comment # | <p>340</p> |
| Question | <p>General</p> |

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| Section | VCS REVISION TO STANDARDIZE COMPONENTS OF AVOIDING UNPLANNED DEFORESTATION METHODOLOGIES: Concern 1.4 |
| Reviewer Organization | ICROA |
| Reviewer Country | Switzerland |
| Response(s) - including general questions & comments | <p>Verra has not road tested the impact of their VCS JNR default risk map and allocation tool on existing VCS projects, and therefore are unaware of the economic impact the VCS JNR methodological consolidation decision could have on the existing VCS REDD+ projects or the financial viability of future projects. This requires project developers to conduct a comparison of the default approach to other project baselines or nesting approaches themselves and at their own cost. To date, we know of very few project developers who have the technical capacity, time or funding to test the VCS JNR risk map and allocation tools. Verra's response has been to tell project developers that they are welcome to hire a consultancy to perform the testing. Verra is a market actor. We are not aware of any other market actors that propose to publish essential tools, that the market is expected to use by default, without first testing them for practicality, viability, and fitness for purpose. We feel it is inappropriate to push the responsibility for testing Verra's tools on to the project development community, at their own expense</p> |
| Verra Response | Verra and others have now tested the <i>UDef-RP</i> and <i>UDef-AP</i> enough to know that while the process is likely to generate lower emission reduction baselines in some cases, in other cases those baselines will be higher. We hope to make some of these tests public soon. |
| Aster Global Assessment | The assessment team does not have a version Udef-RP or Udef-AP, nor the tests conducted to assess whether this concern is addressed |
| Aster Global Initial Findings | CL: Please provide a version of the Udef-RP/Udef-AP as well as tests to substantiate that this comment is addressed. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Verra and others have now tested the UDef-RP and UDef-AP enough to know that while the process is likely to generate lower emission reduction baselines in some cases, in other cases those baselines will be higher. Verra is pleased that it will be able to share results from some case studies, but cannot promise a timeline.</p> <p>Response to additional points raised by Aster: Tools have been shared with Aster. We are not required to undertake or provide testing as part of the process.</p> |
| Aster Global Findings Round 2 | The assessment team notes that the Udef-RP and Udef-AP tools have been provided. The methodology developer notes that the referenced tools have been tested to know that the process is likely to generate lower emission reductions in baselines in some cases, but higher in others. The assessment team notes that due account has been taken of the commenter's concern, as an explanation of the testing processes has now been provided. The assessment team acknowledges that evidence of additional testing is outside the scope of this review. Item closed. |
| Status | closed R2 |
| Response Updated | wording/typo updates |

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| Since Finding Closed? | |
| Revised Verra Response October 2023 | Verra and others have now tested the UDef-RATP and UDef-AP enough to know that while the process is likely to generate lower emission reduction baselines in some cases, in other cases those baselines will be higher. Verra is pleased that it will be able to share results from some case studies, but cannot promise a timeline. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 341 |
| Question | General |
| Section | VCS REVISION TO STANDARDIZE COMPONENTS OF AVOIDING UNPLANNED DEFORESTATION METHODOLOGIES: Concern 2 |
| Reviewer Organization | ICROA |
| Reviewer Country | Switzerland |
| Response(s) - including general questions & comments | <p>Verra currently allows project baselines to be valid for 10 years before they need to be reassessed. Verra has indicated that it will now require both jurisdictional baselines and nested project baselines to be updated every 4-6 years, after which the current baseline becomes invalid. As such, if a project start date coincides with the beginning of a new baseline period, they would have between 4 and 6 years of baseline certainty with which to establish the economic viability of their project to attract investment. However, if projects have start dates within a given 4-6 year validity period, they could have as little as 1 year of baseline certainty before having to adopt a new baseline. There are a significant number of stakeholders in the developer and investor communities that believe this additional uncertainty in performance potential will significantly dampen investor enthusiasm and slow growth, just when projects require accelerated investment for climate, biodiversity and social reasons alike.</p> <p>Verra's reasoning for the proposed new baseline validity period rule is that: 1. baselines must be updated often to accurately represent rapidly changing emissions trends and 2. baselines become "meaningless" after their defined validity period of 6 years.</p> |
| Proposed Change(s) | Verra could maintain the 4-6-year baseline update requirement, but allow a longer baseline validity period for new projects calculating their first baseline. This would allow new projects to maintain their first baseline for enough time to support investor needs. We further recommend that Verra consults with major investors and project developers in the space to determine an appropriate duration for the first baseline validity period for new projects. |
| Verra Response | <p>Under the VCS Standard, the baseline for AUDD projects is six years.</p> <p>Based on conversations with stakeholders, including some critical of this decision, the following text has been added in Section 8.1.1 of M0184 relating to projects' adoption of the jurisdictional baseline: "Where a project validates or transitions to VM0184 after the initial year of a jurisdictional BVP, the project proponent(s) may choose to request allocation of data from the subsequent jurisdictional BVP when that BVP begins. Alternatively, the initial project BVP may be the duration set out in the VCS Standard – regardless of whether it spans two jurisdictional BVPs. After the initial project BVP, the project must adopt an allocation from the respective jurisdictional baseline. Subsequent project BVPs must be the same duration as the jurisdictional BVP."</p> |
| Aster Global Assessment | The implications of the referenced text are unclear to the assessment team. |

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| Aster Global Initial Findings | CL: Please clarify the implications of the referenced text and consider revising the language to make it more clear. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: This policy does allow projects to carry forward the baseline for a longer period (ie, for the length set out- 6 years) or adopt the new baseline when it is ready-- As suggested by the commenter. Under the VCS Standard, the baseline for AUDD projects is six years.</p> <p>Based on conversations with stakeholders, including some critical of this decision, Verra has made an allowance for projects during their first baseline validity period to carry over their AD allocation into a subsequent BVP under certain circumstances, as described in Section 8.1.1 of M0184 v0.4. Project proponents may elect to update to the second jurisdictional BVP up to two years after that BVP begins.</p> <p>As for financial feasibility, Verra recognizes it is may be more difficult to undertake pre-feasibility for projects in this limited phase where data is not available. However, we believe that the new methods will actually increase investment due to higher credibility of the baseline approach.</p> <p>Response to additional points raised by Aster: This philisophical argument is outside the scope of review.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>This policy does allow projects to carry forward the baseline for a longer period (ie, for the length set out- 6 years) or adopt the new baseline when it is ready-- As suggested by the commenter. Under the VCS Standard, the baseline for AUDD projects is six years.</p> <p>Based on conversations with stakeholders, including some critical of this decision, Verra has made an allowance for projects during their first baseline validity period to carry over their AD allocation into a subsequent BVP under certain circumstances, as described in Section 8.1.1 of M0184 v0.4. Project proponents may elect to update to the second jurisdictional BVP up to two years after that BVP begins. See comment #168.</p> <p>As for financial feasibility, Verra recognizes it is may be more difficult to undertake pre-feasibility for projects in this limited phase where data is not available. However, we believe that the new methods will actually increase investment due to higher credibilty of the baseline approach.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |

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| Comment # | 342 |
| Question | General |
| Section | METHODOLOGY ADAPTATION PROCESS |
| Reviewer Organization | IETA |
| Reviewer Country | United Kingdom |
| Response(s) - including general questions & comments | <p>VCS/JNR Alignment: According to the consultation documents and materials, the methodological adaptation process will align the AUDD methodologies with the principles of VCS JNR to determine nested reference levels for all VCS Projects. Some governments have already established an approach to determine nested reference levels, and some countries are not implementing VCS/JNR, however in these proposed updates, the VCS JNR approach will be applied everywhere. IETA accepts that moving to a nested system is necessary, and that consolidating the methodologies will support consistency across project baselines, however we do have concerns with the approach outlined by Verra.</p> <p>Timeline & Potential Transition Period: Verra has put the validation and verification of ALL VCS nested projects on hold until they formally release their methodological consolidation guidelines. This is holding up the development of projects right now, and the uncertainty about nested project baselines in the future is already impacting investment in the sector. This also impacts local communities and stakeholders. Verra has recently indicated that the consolidation process will not be complete until October 2022.</p> |
| Proposed Change(s) | Verra should allow for a “transition period” until the updated methodologies are ready to be implemented, especially considering the delays which have taken place to date. Project reference levels establish the maximum possible performance of any project and have been widely used as the most important metric in establishing project financing in the VCM. Therefore, after a long period of discussing with Verra these significant changes for the construction of the baselines, existing and new proponents have been trapped in limbo regarding the financial feasibility of their projects. Projects currently operating are at risk of no longer having a viable business, which impacts both climate goals and commitments to local communities. |
| Verra Response | See the Verra website post Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits for information on projects' transition to the new methodology. |
| Aster Global Assessment | The methodology developer directed the commenter to a website post. The assessment team reviewed the post which includes information regarding the transition period. However, it is unclear how reference to this post addresses the commenter's concern regarding changes and the impact to the financial feasibility of projects. |
| Aster Global Initial Findings | CL: Please provide clarification regarding the concerns regarding changes and the impact to financial feasibility of projects. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: See the Verra website post Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits for information on projects' transition to the new methodology.</p> <p>Verra understands that there may be financial impact on projects. One of the things the methodology does is restrict the potential for unconservative baseline assumptions, which is essential for long-term credibility of this market. It is anticipated that with lower supply and higher credibility (that should be eligible for ICVCM CCPs), prices will rise.</p> |

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| | While updates will affect financial feasibility (both positively and negatively, depending on the project), this will help prevent inflation in the sector. |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | See comment #304 <p>Verra understands that there may be financial impact on projects. One of the things the methodology does is restrict the potential for unconservative baseline assumptions, which is essential for long-term credibility of this market. It is anticipated that with lower supply and higher credibility (that should be eligible for ICVCM CCPs), prices will rise.</p> <p>While updates will affect financial feasibility (both positively and negatively, depending on the project), this will help prevent inflation in the sector.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 343 |
| Question | General |
| Section | VCS / JNR ALIGNMENT: RISK MAP, BASELINE, REFERENCE PERIODS |
| Reviewer Organization | IETA |
| Reviewer Country | United Kingdom |
| Response(s) - including general questions & comments | <p>One of the concerns, first outlined above, is Verra's proposal to apply their JNR approach to countries that have already established their own nesting approach. This raises a few concerns and complications, see below.</p> <p>Risk Map. Verra had initially indicated that they might allow countries to develop their own deforestation risk maps, but only if the countries could prove they were of higher quality than Verra's default. However, there does not seem to be clear comparison criteria for alternatives to Verra's default risk mapping methodology. This makes it challenging to propose an alternative to the default, unless the alternative shares Verra's design approach. An additional complication is that there could be a scenario where there are multiple projects in a jurisdiction and one of the projects provides a risk map, but the others do not. In this scenario, how will Verra reconcile the risk across the jurisdiction?</p> <p>Baseline Calculation / Allocation. Additionally, in all cases, countries must use Verra's JNR baseline calculation / allocation tool to allocate nested project baselines. This applies even if a national REDD+ program has a high-quality baseline calculation and allocation tool of their own. This guarantees that Verra's VCS JNR allocation approach, which includes discounting for uncertainty and bias, will always be out of</p> |

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| | <p>sync with national REDD+ results. While we agree with the importance of applying the highest quality jurisdictional baseline to nested REDD+ projects, Verra has to date been unable to successfully demonstrate a quality comparison of any alternative jurisdictional / national baseline to its VCS JNR defined default, essentially leading to a situation where the Verra-calculated baseline is assumed to be the most accurate option, without validating this assumption. We feel that denying the use of National REDD+ program data in VCM nested projects is sending the wrong message to host countries and not encouraging them to improve the quality of their data in order to be able to participate in the VCM. We therefore request that Verra include the option to allocate national / jurisdictional FRELs should the baselines, risk maps, and allocation tools meet a specifically defined quality threshold.</p> <p>Furthermore, IETA is concerned that by focusing the baseline on the historical deforestation inside the site and a small area around it, REDD+ will become focused largely on areas that are actively being cleared and less focus or financing will flow to those areas where damage is likely or imminent but not yet active.</p> <p>Data. IETA requests Verra to provide more clarity on the proposal for third party consultants to provide the forest cover and activity data. There is insufficient detail on how this data will be paid for and this is likely to further constrain project development and lead to duplication of analysis.</p> <p>Reference Periods. The module indicates that the reference period should be determined “according to the latest version of the VCS Standard.” However, the VCS standard does not yet specify a historical reference period. We understand that VERRA has engaged consultants to explore this question, but further clarity is requested, with more specific language in the module.</p> <p>Jurisdictional Reference Area. IETA requests clarity on what is included in the jurisdictional reference area. In order to ensure that the VCS Baseline Scenario remains “activities and GHG emissions that would occur in the absence of the project activity”, the jurisdictional reference area must exclude existing Verra projects. However, this is not currently explicitly stated in the module.</p> <p>Degradation. IETA is concerned that degradation is not required to be included during baseline assessment or project monitoring. Verra’s current proposal for the benchmark methodology is based on the JNR Risk Mapping Tool. This will assign the highest risk score to forests closest to areas with high deforestation activity. In practice, this will prioritize avoiding deforestation over forest degradation. While we understand that the proposed revision allows for claiming credits for avoiding forest degradation using existing methodologies, we are concerned that there is a risk that it will create a perverse incentive for preventing deforestation instead of degradation.</p> <p>We are too far along the climate change process and the development of voluntary carbon markets to move forward with sub-optimal methods. Degradation accounts for a significant percentage of land use emissions and excluding them (and solely referring to the binary forest definition leaves out considerable emissions. Forest degradation is a stepping-stone to deforestation, it is therefore important to protect areas in the forest margin suffering from early-stage degradation to prevent deforestation. Further, the impact of forest degradation on emissions is perceived in many cases to be greater than deforestation; and finally, forest degradation has a major impact on biodiversity.</p> |
| Proposed Change(s) | IETA requests that Verra clarify whether a project can provide a risk map and what criteria would need to be met for that risk map to supersede that of a Verra default risk map. Furthermore, we suggest that universally applicable, objective comparison criteria are used to compare alternative Risk Maps to Verra’s default. |

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| | <p>We recommend that a minimum number of years be included as a reference period with the potential to increase that number based on justifiable project circumstances and that VERRA provide guidance on what those circumstances may be (e.g.: a spike in deforestation that is out of the norm over a shorter period). As a longer reference period generally allows for statistically more robust projections and more stability to project developers, we recommend it range from 10 to 15 years.</p> <p>We urge Verra to include degradation in the activity maps. The FREL maps and risk allocation tool should also appropriately reflect degradation.</p> <p>In addition, IETA urges Verra to consider the use of factor maps in areas of accelerating forest degradation, in order to map and address future threats to deforestation. The use of factor maps should be audited by high-quality independent auditors.</p> |
| Verra Response | <p>See Appendix 4 for details on the supplemental materials stakeholders can submit; these do include risk map inputs.</p> <p>The <i>UDef-RP</i> is currently being revised; the new version includes a clear statistical process to compare the Verra benchmark risk map with any other risk map.</p> <p>The historical reference period is set at 10 years (as set out in the <i>VCS Methodology Requirements</i>).</p> <p><i>AUDef</i> is only applicable to deforestation. An unplanned forest degradation module is envisioned at a later stage. In the VCS Program, planned forest degradation is an improved forest management activity.</p> |
| Aster Global Assessment | <p>The assessment team reviewed Appendix 4 and could not locate information what criteria would need to be met for an independently developed risk map to supersede that of a Verra created default risk map. The assessment team does not have a version Udef-RP to assess whether this concern is addressed. Additionally the situation in which there are multiple projects in a jurisdiction and only one provides a risk map.</p> <p>It is unclear how the concern regarding national/jurisdictional FRELS has been addressed by the methodology developer's response.</p> <p>It is unclear how the concern regarding focusing the baseline on the historical deforestation inside the site is addressed by the methodology developer's response.</p> <p>It is unclear how the concern regarding lack of sufficient detail on financing development of data has been addressed by the methodology developer's response.</p> <p>The methodology developer clarified that the historical reference period, appropriately addressing the associated comment.</p> <p>It is unclear how the methodology developer's response regarding degradation addresses the commenter's concern.</p> |
| Aster Global Initial Findings | <p>CL: Please provide responses to each of the commenter's concerns and how the revisions to the methodology/module address them.</p> |
| Round 1 Response from Methodology Developer | <p>Verra AD providers will attempt to use data used to construct government FREL where available, but such data must meet the same standards and 3rd-party developed AD outlined in appendix 1, to ensure integrity.</p> <p>Historical deforestation inside the site is not the basis for determination, but rather the</p> |

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| | <p>modeled risk based on jurisdictional activity data and a spatially explicit risk map that considers the historical patterns of deforestation in relation to potential explanatory landscape variables. However, PPs can submit materials to support alternative risk maps for consideration by the data service provider that take other criteria into account. Elements related to the risk map that may be submitted to data developers are outlined in Appendix 4.</p> <p>Fee schedule is forthcoming (see comment 13)</p> <p>Degradation module is forthcoming.</p> |
| Aster Global Findings Round 2 | <p>Table 18 in Appendix A contains the allowable data contributions by the stakeholders, as well as denotes where no stakeholder input is considered. It is unclear if Verra's response to the Assessment Team stating "Verra AD providers will attempt to use data used to construct government FREL where available, but such data must meet the same standards and 3rd-party developed AD outlined in appendix 1, to ensure integrity," or something similar, should be added somewhere in Table 18, where relevant for clarity and transparency.</p> <p>Since Verra provides the AD, it is not in the spirit of the module to allow sub-national or national jurisdictions to provide their own values. The assessment team believes that Verra's process (as detailed in Table 18) will allow input from stakeholders that will also allow for better alignment with the host country data. This sub-item is addressed.</p> <p>The assessment team agrees that a fee schedule review is outside the scope of our assessment, so this sub-item is addressed.</p> <p>Aster Global will need to re-review these comments once the additional modules are completed.</p> |
| Round 2 NCR/CL/OFI2 | <p>CL: Please include a statement in or near Table 18 describing the stakeholder data quality standards that will be expected.</p> <p>Please note this comment will be re-opened for future module review.</p> |
| Round 2 Response from Methodology Developer | <p>Revised Verra response to original comment: Thanks for the suggestion. Text describing this possibility is included in the appropriate location (Section A4.3.4 Stakeholders' contribution to jurisdictional approach of MD00XX). No need to also include it in Table 18.</p> |
| Aster Global Findings Round 3 | <p>The assessment team confirmed that the provided response is sufficient to close the identified finding.</p> |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>Thanks for the suggestion. Text describing this possibility is included in the appropriate location (Section A4.3.4 Stakeholders' contribution to jurisdictional approach of MD00XX55). No need to also include it in Table 18.</p> |
| Aster Global Assessment of Revised Response | <p>The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required.</p> |

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| Comment # | 344 |
| Question | General |
| Section | General |
| Reviewer Organization | Green Growth Consulting Firm |
| Reviewer Country | Bhutan |
| Response(s) - including general questions & comments | All modules are technically rigid. |
| Proposed Change(s) | I think all modules may need to undergo field-testing before applications. |
| Verra Response | Verra would appreciate the commenter's suggestions on how to make <i>AUDef</i> more flexible without losing environmental integrity. |
| Aster Global Assessment | The methodology developer invited the commenter to provide suggestions. |
| Aster Global Initial Findings | CL: Please clarify if the commenter provided any suggestions. If so, please provide the suggestions and Verra's associated responses. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: Modules are more rigid to prevent inflation. Substantive testing has been completed. Response to additional point raised by Aster: No further suggestions have been received. |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Modules are more rigid to prevent inflation. Substantive testing has been completed. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 345 |
| Question | General |
| Section | General |
| Reviewer Organization | Green Growth Consulting Firm |
| Reviewer Country | Bhutan |

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| Response(s) - including general questions & comments | I suggest separate modules like afforestation/reforestation, social forestry models, community forestry models, agroforestry models, PAs, Outside PAs, SFM, REDD+, |
| Verra Response | This is the approach we've now taken with the overarching framework REDD methodology (VM0184) and individual modules for <i>AUDef</i> , avoiding planned deforestation and avoiding unplanned forest degradation (the latter two are still to come). Improved forest management and ARR each have different VCS methodologies that can be combined with VM0184. |
| Aster Global Assessment | The methodology developer took due account by clarifying that the methodology being developed and modular, and different project activities suggested can utilize this or other methodologies. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | This is the approach we've now taken with the overarching framework REDD methodology (VVM0048) and individual modules for <i>AUDef</i> , avoiding planned deforestation and avoiding unplanned forest degradation (the latter two are still to come). Improved forest management and ARR each have different VCS methodologies that can be combined with VVM0048. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 346 |
| Question | General |
| Section | General Observations: 1 |
| Reviewer Organization | Permian |
| Reviewer Country | England |
| Response(s) - including general questions & comments | <p>1. Follow an evidence-based approach before full scale implementation We commend the efforts of the Verra Secretariat to strive to improve the quality of the carbon accounting methodologies. While the proposed approach may improve the alignment between project scale accounting and jurisdictional scales, more evidence is required to prove that this will provide a more accurate approach to carbon accounting.</p> <p>a. Verra should explore the implications of the proposed changes to the carbon accounting and resultant economics of projects before moving forward, taking into consideration the costs of averting deforestation across the tropics. It is a fundamental law of economics that successful management practices should be rewarded and not penalized. There should be an overall review of Verra processes to ensure that they are encouraging management of forests which will reduce deforestation and degradation globally, over the next decades. The proposed changes seem likely to cause significantly lower numbers of credits from all AUDD projects over the life of the projects, as they will significantly underestimate the absolute amount of emissions that are being avoided as are not fully considering what threat is being mitigated. Verra should explore whether the resulting finances available would be sufficient to stop deforestation.</p> <p>b. The assumption that jurisdictional deforestation may decline over time, under the current proposed changes, results in the additionality of projects declining over time. This assumption will have to be thoroughly evaluated. It may not be fair to suggest that if deforestation is being successfully mitigated, that performance implies a</p> |

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| | <p>reduced threat of deforestation, simply because deforestation is being demonstrated to have been reduced over the time period under consideration.</p> <p>c. Verra should also ensure new methods do not damage the economic viability of existing projects, which are legitimately using current methodologies. This would disincentivize the private sector to support further avoided deforestation projects, with knock-on effects for biodiversity conservation, community development and indeed climate mitigation goals.</p> |
| Proposed Change(s) | <p>Before bringing the proposed changes forward, Verra should explore the implications of the assumption that jurisdictional deforestation may decline over time under the current proposed changes. This assumption, without proper evidence to support it, can result in a flaw for the economic model of AUDD projects, resulting in the introduction of higher uncertainty to the investment horizon of financiers. Jurisdictional deforestation may decline due to well performing projects, but this does not mean that the threat of deforestation within the jurisdiction has necessarily declined across the jurisdiction as a whole.</p> <p>It is highly advised to allow transitioning from the current proven methodological approaches to the new approach, if it can be deemed more accurate. If there is strong evidence that the resulting carbon credits generated with the new approach are of better quality and realized in due time to address global deforestation and forest degradation then this approach may be implemented over some sensible transitional period, to avoid unnecessary bottlenecks in the market. This analysis should be thoroughly undertaken and made public before proceeding on the proposed basis.</p> |
| Verra Response | <p>See the Verra website post Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits for information on projects' transition to the new methodology (https://verra.org/consolidated-redd-methodology-ensures-integrity-of-forest-conservation-credits/).</p> <p>The consolidated REDD methodology does not assume that jurisdictional deforestation will decline over time. The rate of future (over the following 6-yr validity period) deforestation is assumed to be equal to the (conservatively corrected for uncertainty) 10-yr historical average. Such projection is then to be revisited six years later, and such reassessment may yield a lower, similar, or even a higher jurisdictional deforestation rate, which would be used for constructing the baseline for the following 6-yr validity period. And so on.</p> |
| Aster Global Assessment | <p>The methodology developer directed the commenter to a website post which discusses the transition to the new methodology. The commenter's suggestion advised allowing transition after demonstration that the new approach is more accurate. The referenced website post provides guidance on the already established transition timelines, without consideration of demonstration of accuracy.</p> <p>The assessment team determined the response to sub-item B sufficiently addresses the comment. The assessment team determined sub-item C is outside the scope of the methodology.</p> |
| Aster Global Initial Findings | <p>CL: Please clarify how due account was taken regarding the commenter's suggestion that transition periods be implemented after demonstration that the new methodological approach is more accurate.</p> |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <p>The consolidated REDD methodology does not assume that jurisdictional deforestation will decline over time. The rate of future (over the following 6-yr validity period) deforestation is assumed to be equal to the (conservatively corrected for uncertainty) 10-yr historical average. Such projection is then to be revisited six years later, and such reassessment may yield a lower, similar, or even a higher jurisdictional deforestation rate, which would be used for constructing the baseline for the following 6 year validity period.</p> |

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| | <p>Risk mapping and allocation are innovative approaches that are to-date undocumented in scientific literature. The latest versions of the <i>UDef-RP</i> and the <i>UDef-AP</i> take into account the results of extensive testing by Clark Labs and other stakeholders.</p> <p>See the Verra website post "Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits" for information on projects' transition to the new methodology (https://verra.org/consolidated-redd-methodology-ensures-integrity-of-forest-conservation-credits/).</p> <p>Explanation of original Verra response: We left out explanation of the "accuracy" of the new approach. The transition period has been underway for two years, and has been set out going forward. It is time to transition to the new approach to ensure integrity.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>The consolidated REDD methodology does not assume that jurisdictional deforestation will decline over time. The rate of future (over the following 6-yr validity period) deforestation is assumed to be equal to the (conservatively corrected for uncertainty) 10-yr historical average. Such projection is then to be revisited six years later, and such reassessment may yield a lower, similar, or even a higher jurisdictional deforestation rate, which would be used for constructing the baseline for the following 6 year validity period.</p> <p>Risk mapping and allocation are innovative approaches that are to-date undocumented in scientific literature. The latest version of VT0007-s of the <i>UDef-RP</i> and the <i>Unplanned Deforestation Risk Mapping and Activity Data Allocation Tool Procedure (UDef-RATP)</i> take into account the results of extensive testing by Clark Labs and other stakeholders.</p> <p>See comment #304</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 347 |
| Question | General |
| Section | General Observations: 2 |
| Reviewer Organization | Permian |
| Reviewer Country | England |

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| Response(s) - including general questions & comments | <p>Uncertainty in the allocation of deforestation to Projects Areas</p> <p>We believe that removing the concept of proxy areas from the methods to create deforestation baselines for projects will result in significantly different emission reduction profiles for projects. Importantly, these differences can be explained by the sensitivity to risk mapping and allocation method within project areas using land cover transitions only. We suggest considering only proximity to historic deforestation is a massive oversimplification of the required analytical process.</p> <p>In addition, tropical deforestation has been a highly random phenomenon over the last two decades - in high forest cover high deforestation countries - and it is unclear how a six year historical reference period can accurately capture such variability and complexity for activity data allocation at the project area scale. Therefore, we suggest considering historical periods of at least 10 years when generating project baselines, and indeed jurisdictional baselines, even when a shorter baseline reassessment period could be plausible.</p> |
| Proposed Change(s) | <p>Verra should simulate the performance of the proposed new methodologies before the changes are implemented and ideally using a historical reference period representative of 10 years, rather than six years. Such an exercise can allow Verra to test whether the baselines assigned to projects, using these new methods, are representative of the deforestation actually observed during a validation period. We suggest that this approach will help demonstrate the sensitivity of the risk mapping and allocation method for projects that often exhibit different deforestation configurations. Verra should also replicate the analysis with a standardized reference region, as the use of standard proxy areas can still be plausible when the limitations of methods used to propagate deforestation may result in material underestimations of project additionality.</p> <p>We strongly recommend that Verra consider allowing AUDD projects to continue to be developed using the existing methodological approach until further evidence can demonstrate that the new proposed approach is an improvement on the old. The current growth rate of the market is evidence that both buyers of VCUs and suppliers consider this existing approach as the best available, and the current moratorium is only causing unnecessary delays. If it can be demonstrated using detailed analysis that this new proposed approach is an improvement, in terms of accuracy, then it could be adopted over a sensible transition period.</p> |
| Verra Response | <p>Verra acknowledges that some projects may have different emission reduction profiles under this methodology than under previous ones.</p> <p>The historical reference period is, per the <i>VCS Methodology Requirements</i>, 10 years.</p> <p>We have done extensive testing of the <i>UDef-RP</i> as it is being revised; we will make some of this public shortly.</p> |
| Aster Global Assessment | <p>The methodology developer acknowledged that some projects may have different emission reduction profiles and states that extensive testing of Udef-RP has been conducted. The assessment team does not have access to Udef-RP or the testing conducted to determine if this response adequately addresses this comment and is an improvement in terms of accuracy.</p> <p>Due account was taken regarding the historical reference period.</p> |
| Aster Global Initial Findings | <p>CL: Please provide the Udef-RP tool and provide evidence of the testing conducted.</p> |
| Round 1 Response | <p>Revised Verra comment addressing original public comment: Verra acknowledges that some projects may have different emission reduction profiles</p> |

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| from Methodology Developer | <p>under this methodology than under previous ones.</p> <p>The historical reference period (HRP) is, per the VCS Methodology Requirements, 10 years (HRP is defined in the methodology by referring to the Methodology Requirements).</p> <p>Risk mapping and allocation are innovative approaches at the jurisdictional scale, that are to-date undocumented in scientific literature because there has yet to be a body of projects implementing them to evaluate. The latest versions of the UDef-RP and UDef-AP take into account the results of extensive testing by Clark Labs and other stakeholders.</p> <p>Explanation of original Verra response: Modified only slightly as the UDef-RP is out of the scope of this consultation.</p> <p>Response to additional point raised by Aster: The UDef-RP has been shared with Aster</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>Verra acknowledges that some projects may have different emission reduction profiles under this methodology than under previous ones.</p> <p>See comment #133</p> <p>See comment #346</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 348 |
| Question | General |
| Section | Detail Observations: 1 |
| Reviewer Organization | Permian |
| Reviewer Country | England |
| Response(s) - including general questions & comments | <p>Use of a sampling method versus wall-to-wall remote sensing.</p> <p>We believe that current technologies and algorithms would allow developing the baselines for jurisdictions, of 2.5 million hectares or lower, using wall to wall remote sensing. This would generally be preferable to sampling because of limitations associated with the adequate spatial and temporal representation of all relevant structural determinants of deforestation. Project developers have competence and</p> |

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| | <p>expertise in this area and therefore they should be permitted to develop baselines when appropriate.</p> |
| Proposed Change(s) | <p>Verra should allow the use of wall-to-wall remote sensing to calculate the deforestation baseline, when the project developer demonstrates the required capabilities/core competencies to develop it for the whole of the jurisdiction, and where the estimates suffice the minimum criteria of the J-ADB-UD module in terms of quality, uncertainty and time of production.</p> |
| Verra Response | <p>Per Appendix 1 Section A1.4.1, "Development of wall-to-wall forest, land cover or land cover change maps is not a requirement for estimating AD.... Any sampling strategy that is spatially representative of the jurisdiction and supported by current best practices may be used as long as its use assists in producing estimates that meet accuracy requirements."</p> |
| Aster Global Assessment | <p>The methodology developer clarified that wall to wall remote sensing could be used. However it is unclear, the methodology developers response addresses the commenter's proposed change that this data be used instead of the dataset produced by Verra.</p> |
| Aster Global Initial Findings | <p>CL: Please clarify in line with assessor findings.</p> |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Per Appendix 1 Section A1.4.1, "Development of wall-to-wall forest, land cover or land cover change maps is not a requirement for estimating AD.... Any sampling strategy that is spatially representative of the jurisdiction and supported by current best practices may be used as long as its use assists in producing estimates that meet accuracy requirements."</p> <p>Furthermore, Verra has decided that the uncertainty of jurisdictional activity data must be estimated, in alignment with emerging global guidance around best practices, including the ICVCM Core Carbon Principles, which state: "It is critical for carbon-crediting programs to understand the level of uncertainty associated with the data and assumptions used to quantify GHG emission reductions or removals to ensure they are estimated conservatively." The only approach to estimate the uncertainty of AD is to employ sample-based approaches. Activity data generated by wall-to-wall mapping, without any area bias correction, would not produce the required uncertainty estimate and bias correction.</p> <p>Explanation of original Verra Response: Verra correctly identified one role of wall-to-wall mapping in the module. Further clarification was provided as to why a sample based approach was chosen over map-based AD.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | <p>The methodology developer's revised response provides additional considerations. The assessment team determined that this revised response has taken due account of the comment. Item closed.</p> |
| Status | <p>closed R2</p> |
| Response Updated Since Finding Closed? | <p>wording/typo updates</p> |
| Revised Verra Response October 2023 | <p>Per AUDef Appendix 1 Section A1.4.1, "Development of wall-to-wall forest, land cover or land cover change maps is not a requirement for estimating AD.... Any sampling strategy that is spatially representative of the jurisdiction and supported by current best practices may be used as long as its use assists in producing estimates that meet</p> |

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| | <p>accuracy requirements."</p> <p>Furthermore, Verra has decided that the uncertainty of jurisdictional activity data must be estimated, in alignment with emerging global guidance around best practices, including the ICVCM Core Carbon Principles, which state: "It is critical for carbon-crediting programs to understand the level of uncertainty associated with the data and assumptions used to quantify GHG emission reductions or removals to ensure they are estimated conservatively." The only approach to estimate the uncertainty of AD is to employ sample-based approaches. Activity data generated by wall-to-wall mapping, without any area bias correction, would not produce the required uncertainty estimate and bias correction.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 349 |
| Question | General |
| Section | Detail Observations: 2 |
| Reviewer Organization | Permian |
| Reviewer Country | England |
| Response(s) - including general questions & comments | The start of the baseline validity period may not coincide with the Project start date. We believe that, in some cases, the approach suggested would not allow for the recognition of the realities of deforestation in the project area at the project start date when the project has to use a jurisdictional baseline which is not current. |
| Proposed Change(s) | Projects should be able to make a reconstruction of the jurisdictional baseline at the project start date to identify any changes in forest circumstances affecting the project area, while maintaining consistency with the jurisdictional calculation methodology. The proposal implies that new projects will use an existing baseline, even if it has only one or two years before a required revision. This does not properly consider the requirements to define a project start date (i.e. when mitigation activities begin). |
| Verra Response | The following text has been added in Section 8.1.1 of M0184 relating to projects' adoption of the jurisdictional baseline: "Where a project validates or transitions to VM0184 after the initial year of a jurisdictional BVP, the project proponent(s) may choose to request allocation of data from the subsequent jurisdictional BVP when that BVP begins. Alternatively, the initial project BVP may be the duration set out in the VCS Standard – regardless of whether it spans two jurisdictional BVPs. After the initial project BVP, the project must adopt an allocation from the respective jurisdictional baseline. Subsequent project BVPs must be the same duration as the jurisdictional BVP." |
| Aster Global Assessment | The implications of the referenced text are unclear to the assessment team. |
| Aster Global Initial Findings | CL: Please clarify the implications of the referenced text and consider revising the language to make it more clear. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: Commenter is correct that for projects with a start date other than the first year of the baseline validity period (BVP), the activity data allocated to the project in its start year will be based on a historical reference period that ends at least one year prior to the project's start year. However, the AD allocated to all projects in a year other than the first year of the BVP will also be similarly out of date, so there is nothing specific to new projects in this regard. |

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| | <p>The VCS Program does not require dynamic baselines. For methodologies that do not employ dynamic baselines, the ex-ante projection of a baseline is maintained as valid until the methodology requires it to be updated. AUDef does not employ a dynamic baseline, and therefore Verra does not identify the highlighted issues as out of compliance with the VCS Program.</p> <p>Out of practical considerations, Verra has made an allowance for projects during their first baseline validity period to carry over their AD allocation into a subsequent BVP under certain circumstances, as described in Section 8.1.1 of M0184 v0.4. Project proponents may elect to update to the second jurisdictional BVP up to two years after that BVP begins.</p> <p>Explanation of original Verra Response: Verra's initial response focused on the carry-over of AD for a projects first BVP. The rules around this allowance have been revised since the original response, and are now reflected in the revised comment above. Additional clarification has been added to address the concern around AD allocation being out of date for new projects.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | The methodology developer has provided a response on how the module complies with VCS program requirements for baselines and has provided additional information clarifying practical considerations that have been made, which together sufficiently address the comment. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>Commenter is correct that for projects with a start date other than the first year of the baseline validity period (BVP), the activity data allocated to the project in its start year will be based on a historical reference period that ends at least one year prior to the project's start year. However, the AD allocated to all projects in a year other than the first year of the BVP will also be similarly out of date, so there is nothing specific to new projects in this regard.</p> <p>The VCS Program does not require dynamic baselines. For methodologies that do not employ dynamic baselines, the ex-ante projection of a baseline is maintained as valid until the methodology requires it to be updated. AUDef does not employ a dynamic baseline, and therefore Verra does not identify the highlighted issues as out of compliance with the VCS Program.</p> <p>See comment #168</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 350 |
| Question | General |
| Section | Detail Observations: 3 |
| Reviewer Organization | Permian |
| Reviewer Country | England |

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| Response(s) - including general questions & comments | <p>Allocation of activity data to project areas based on risk mapping only (no reference region used)</p> <p>We believe that risk mapping is likely the way forward to improve the accurate allocation of additionality to projects from jurisdictional baselines. The current proposal to allocate the amount of deforestation to project areas, based on the risk outside of project areas, will result in materially different emission reduction profiles, when compared with results from the use of existing methodologies. The most important difference between the proposed new and existing methodologies is that the new methodologies remove the use of proxy areas (reference regions). A proxy area is an area analogous to the project area, which may have already experienced the impact of deforestation drivers in the past, which the project area has not yet experienced, but may face in the future.</p> |
| Proposed Change(s) | <p>It is suggested that Verra allows the use of a standard reference region, that serves as a proxy area, to explain deforestation experienced previously in similar areas which the project area could face in the future. This would not only rely on a simple proximity to existing deforestation fronts, which we suggest is a major oversimplification of the existing methods.</p> |
| Verra Response | <p>The benchmark approach in the revised <i>UDef-RP</i> is based on distance to nearest forest edge. However, competing maps may be generated and can include other factors (including those submitted by stakeholders, as set out in Appendix 4).</p> <p>However, this methodology is dependent on there being only one risk map for the entire jurisdiction.</p> |
| Aster Global Assessment | <p>The assessment team does not have a version of the <i>UDef-RP</i>. As such the assessment team cannot determine whether the changes made are sufficient to address the commenter's concern.</p> <p>The methodology developer clarified that the methodology is dependent on there being only one risk map for an entire jurisdiction. It is unclear how this response addresses the commenter's suggestion of using a standard reference region.</p> |
| Aster Global Initial Findings | <p>CL: Please provide the assessment team with a copy of the current <i>UDEF-RP</i>.</p> <p>CL: Please clarify how due account was taken of the commenter's suggestion.</p> |
| Round 1 Response from Methodology Developer | <p>Project-proponent developed reference regions is a major source of lack of market confidence in project REDD, and Verra has made the strategic decision to completely move away from the approach. This will provide a more clear pathway for project crediting to align with jurisdictional programs, and it provides a total cap on crediting that is proportional to the emissions of the overall jurisdiction.</p> <p>Response to additional point raised by Aster: The <i>UDef-RP</i> has been shared with Aster</p> |
| Aster Global Findings Round 2 | <p>The assessment team has been provided <i>Udef-RP</i>. The methodology developer's response provides additional clarification sufficient to address the commenter's suggestion.</p> |
| Status | <p>closed R2</p> |
| Response Updated Since Finding Closed? | <p>wording/typo updates</p> |
| Revised Verra Response October 2023 | <p>Project-proponent-developed reference regions is a major source of lack of market confidence in project REDD, and Verra has made the strategic decision to completely move away from the approach. This will provide a more clear pathway for project</p> |

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| | crediting to align with jurisdictional programs, and it provides a total cap on crediting that is proportional to the emissions of the overall jurisdiction. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 351 |
| Question | General |
| Section | Detail Observations: 4 |
| Reviewer Organization | Permian |
| Reviewer Country | England |
| Response(s) - including general questions & comments | <p>Limiting use of imagery to 5 meters or higher to derive baseline activity data is unnecessary.</p> <p>We have already indicated that using wall to wall remote sensing should generally be preferable to sampling to develop the baselines for jurisdictions of 2.5 million hectares or lower. That said, we are in favor of using the best available data to aid the wall to wall classification of satellite images. Therefore, we believe that other medium resolution remote sensing data should be promoted, especially if they fulfil precision and uncertainty requirements. The acceptance of an alternative spatial resolution (e.g. 10m to 30m) would lead to a greater availability of sensors. This would significantly increase the temporal resolution of the analyses and, therefore, would have an impact on the reduction of uncertainties. In addition to this, we believe that other technical parameters, such as sensors electromagnetic range (optical spectrum) or number of bands, must be considered when selecting the most appropriate product as they are equally or even more important than the specific spatial resolution when performing spatiotemporal land cover and land change assessments of 10 years historical reference periods.</p> |
| Proposed Change(s) | Alternative imagery to aid the wall to wall classification of satellite images (e.g. lower spatial resolution [10m to 30m], wider spectral range) should be promoted in combination with wall to wall data acquisition to produce jurisdictional activity data if it can be demonstrated that the combination of the aforementioned sensor's characteristics produces adequate results and if cloud cover prevents the use of higher resolution data. |
| Verra Response | The minimum spatial resolution for imagery has been changed to 10 m. |
| Aster Global Assessment | The methodology developer clarified that spatial imagery resolution has been updated in line with the commenter's suggestion. However, it is unclear, how the response fully addresses the commenter's proposed change. |
| Aster Global Initial Findings | CL: Please clarify how due account of the commenter's concern was taken. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The minimum spatial resolution for imagery has been changed to 10 m. The module makes the following statements regarding the use of ancillary data in section A1.4.1:</p> <p>"Any relevant spatial criterion may be employed to stratify the jurisdictional sampling frame, including observed land cover change in an ancillary wall-to-wall map, areas of hypothesized high versus low risk of deforestation or any other criterion that assists in limiting interpretation effort to meet the uncertainty targets of the estimated AD. "; "image interpretation and may rely on a combination of imagery, secondary remote sensing data and ancillary spatial or non-spatial data. "</p> <p>The proposed changes by the commenter are permissible under the module, as long</p> |

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| | <p>as the primary imagery dataset used for plot interpretation meets minimum accuracy requirements.</p> <p>Explanation of original Verra Response: Verra affirms original response, but provides additional context around use of ancillary spatial data, and provides citations in the document.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | The additional context provided in the updated response is sufficient to close the identified finding. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>The minimum spatial resolution for imagery has been changed to 10 m.</p> <p>The module makes the following statements regarding the use of ancillary data in section A1.4.1: "Any relevant spatial criterion may be employed to stratify the jurisdictional sampling frame, including observed land cover change in an ancillary wall-to-wall map, areas of hypothesized high versus low risk of deforestation or any other criterion that assists in limiting interpretation effort to meet the uncertainty targets of the estimated AD"...."image interpretation and may rely on a combination of imagery, secondary remote sensing data and ancillary spatial or non-spatial data. "</p> <p>The proposed changes by the commenter are permissible under the module, as long as the primary imagery dataset used for plot interpretation meets minimum accuracy requirements.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 352 |
| Question | General |
| Section | Detail Observations: 5 |
| Reviewer Organization | Permian |
| Reviewer Country | England |
| Response(s) - including general questions & comments | <p>Is it realistic for third party data providers to also provide annual monitoring data?</p> <p>We strongly oppose activity data being monitored centrally by Verra for the entire jurisdiction. This approach may not capture the deforestation complexities and the history of deforestation at project scale, using jurisdictional baselines alone, with a historical reference period of less than 10 years as currently proposed, and with an allocation of activity data based solely on modelling deforestation transition risks. We believe project developers are likely to have the competence and expertise to better monitor what is happening in their project areas using the best available data. They are also likely to be better positioned to identify any changes in forest circumstances affecting the project area, while maintaining consistency with the jurisdictional calculation methodologies. Therefore, reliance on third-party data providers to tackle all these complexities at jurisdictional scales to produce monitoring reports at project scales will create delays and cost increases for projects as well as likely cause</p> |

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| | repetition of work. Instead, project level monitoring should be allowed, while focusing efforts on ensuring that sufficient auditors are trained and available to verify that project level monitoring is consistent with the most up to date jurisdictional calculation methodologies. |
| Proposed Change(s) | Project level monitoring should be allowed, as we think it is more accurate and more appropriate. Reliance on third-party data providers to be able to produce monitoring reports will create delays and cost increases for projects. Instead, Verra's efforts should be put on ensuring that sufficient auditors are trained and available to verify that project level monitoring is consistent with the most up to date jurisdictional calculation methodologies, as the demand in the market continues to grow at the current rate. |
| Verra Response | Current procedures require the project to conduct monitoring; it is possible that in the future Verra will provide data. |
| Aster Global Assessment | It is unclear how the methodology developer's response addresses the commenter's concern. |
| Aster Global Initial Findings | CL: Please clarify how due account of the commenter's concern was taken. |
| Round 1 Response from Methodology Developer | <p>Revised Verra response to original comment: We agree with the commenter that at present project proponents should be responsible for monitoring. However, it is possible that in the future Verra will provide data to them for monitoring as well as baseline-setting.</p> <p>Efforts to improve VVB work is underway.</p> <p>Explanation of original Verra response: Modified only slightly; hopefully the updated response better takes into consideration the commenter's (out of scope) concern about Verra priorities.</p> |
| Aster Global Findings Round 2 | The additional context provided in the updated response is sufficient to close the identified finding. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>We agree with the commenter that at present project proponents should be responsible for monitoring. However, it is possible that in the future Verra will provide data to them for monitoring as well as baseline-setting.</p> <p>Efforts to improve VVB work is underway.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 353 |
| Question | General |
| Section | Detail Observations: 6 |
| Reviewer Organization | Permian |
| Reviewer Country | England |
| Response(s) - including general | 6. Risk mapping approach. It would be more optimal for project developers to use existing well documented and peer-reviewed methods of risk mapping, which are certainly already available as |

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| questions & comments | integrated software packages (e.g. LCM TerrSet, Dinamica EGO, etc.), increasing quality and accuracy as well as reducing implementation and troubleshooting time, and are probably already used by their technical teams |
| Proposed Change(s) | Verra should permit alternative peer-reviewed approaches are allowed if they comply with the minimum precision and quality characteristics required when using the risk mapping module. Verra should recommend minimum uncertainty thresholds for risk map |
| Verra Response | See Appendix 4 for details on the supplemental materials stakeholders can submit; these do include risk map inputs. The <i>UDef-RP</i> is currently being revised; the new version includes a clear statistical process to compare the Verra benchmark risk map with any other risk map. The AD that is allocated via the risk map is conservatively discounted if appropriate. |
| Aster Global Assessment | The assessment team does not have a version of the Udef-RP tool, so it is unclear how this criteria is addressed. |
| Aster Global Initial Findings | CL: Please provide the assessment team with a copy of the current UDEF-RP. |
| Round 1 Response from Methodology Developer | Response to additional point raised by Aster: The UDef-RP has been shared with Aster |
| Aster Global Findings Round 2 | The assessment team has been provided with a copy of UDEF-RP, which includes the referenced statistical analyses. However, further analysis of this tool is outside the scope of the methodology. The assessment team believes the developer has taken due account of the initial comment. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | See AUDef Appendix 4 for details on the supplemental materials stakeholders can submit; these do include risk map inputs. The <i>UDef-RATP</i> is currently being revised; the new version includes a clear statistical process to compare the Verra benchmark risk map with any other risk map. The AD that is allocated via the risk map is conservatively discounted if appropriate. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 354 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Clark University |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Please include line numbers in all the documents so readers can refer to line numbers as you request. |

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| Verra Response | N/A |
| Aster Global Assessment | No response required. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | N/A |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 355 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Clark University |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Pontius has many ideas for how to improve the risk mapping tool. |
| Verra Response | Pontius has been involved in revisions to the <i>UDef-RP</i> |
| Aster Global Assessment | No response required. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Pontius has been involved in revisions to the <i>UDef-RATP</i> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 356 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including | AD data is aggregated by LCT. Page 6 of J-ADB-UD it says: Each AD-C may be subdivided into multiple Land Cover Transition (LTC..... error in acronym) classes to |

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| general questions & comments | differentiate such as planned vs unplanned, natural vs anthropogenic, or other sub-categorizations. Does this include differentiating LCTs by ecosystem type (e.g. mangroves)? This is critical for mangroves as they are often under different baseline stressors compared to terrestrial forests. In general, how/when areas are stratified could be more clearly explained in J-ADB-UD. Guessing this is where sampling strata come in but this needs defining. But AD data is not aggregated at the ss level, so this is not a solution to the above. |
| Proposed Change(s) | Allow mangrove->non-mangrove to be a valid LCT |
| Verra Response | Wetlands have been removed from <i>AUDef</i> |
| Aster Global Assessment | It is unclear how this response is appropriate, as wetland calculation processes are still included in AUDEF. |
| Aster Global Initial Findings | CL: Please clarify in line with assessor findings. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The use of LCTs has been removed. The only required categories are presented in Table 10 of A1.3. Forest types or ecosystem types are not required categories for disaggregation of activity data. Wetlands have been removed from AUDef and REDD activities occurring in wetlands will be covered by alternative methodologies</p> <p>Explanation of original Verra Response: The original comment is concerned about treatment of mangroves, so the comment focuses on the fact that wetlands are no longer a part of the methodology and therefore the original public comment is not applicable anymore. This response was appropriate, but further context on the change in treatment of LCTs is provided.</p> <p>Response to additional points raised by Aster: None</p> |
| Aster Global Findings Round 2 | The additional context provided in the updated response is sufficient to close the identified finding. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>The use of LCTs has been removed. The only required categories are presented in Table 10 of AUDef A1.3. Forest types or ecosystem types are not required categories for disaggregation of activity data.</p> <p>Wetlands have been removed from AUDef and REDD activities occurring in wetlands will be covered by alternative methodologies</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 357 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Silvestrum Climate Associates |

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| Reviewer Country | The Netherlands |
| Response(s) - including general questions & comments | For the first HRP, how to be sure that a forest has been forest for 10 years, without a benchmark map? |
| Verra Response | Individual project proponents need to ensure that this is the case. |
| Aster Global Assessment | The methodology developer responded that individual project proponents need to ensure that the project area is forested during the HRP. While the commenter asked how a project proponent is to do this, the assessment team believes that this falls outside of the scope of the methodology. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Individual project proponents need to ensure that this is the case. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 358 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including general questions & comments | What happens when a project area covers all ecosystem in a jurisdiction? Would there be an incentive to set aside forested areas for the purpose of quantifying ongoing deforestation for subsequent VPs? Would a project be ineligible if there is no leakage belt left, and would there be an incentive to set aside forested areas for the purpose of having a leakage belt? |
| Verra Response | None of the existing projects exhibits conditions like the one described here; this would be a unique and rather extreme case. Unique conditions affecting a specific project can always be considered and decided on a case-by-case basis. |
| Aster Global Assessment | The methodology developer clarified that the scenario referenced by the commenter would be a unique scenario. The assessment team agrees that this would be a unique scenario, and thus the methodology developer's response that this would be assessed on a case-by-case basis is deemed appropriate by the assessment team. Item addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | None of the existing projects exhibits conditions like the one described here; this would be a unique and rather extreme case. Unique conditions affecting a specific project can always be considered and decided on a case-by-case basis. |

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| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 359 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including general questions & comments | J-ADB-UD could do with some diagrams, particularly to help explain how a jurisdiction can be divided by AD and LCT, and how the FCBM fits in. |
| Verra Response | Noted but not done because LCTs were eliminated. |
| Aster Global Assessment | The methodology developer's response addresses the commenter's suggestion, as LCT has been removed from the module. |
| Response Updated Since Finding Closed? | no R1 Verra response |
| Revised Verra Response October 2023 | N/A |
| Comment # | 360 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including general questions & comments | Application guide: not applicable to projects located in a jurisdiction with a registered JNR FREL. Ideally this guide should encompass all projects that are validated under one of the existing REDD methodologies. |
| Proposed Change(s) | By simply acknowledging the decision tree on pg. 6 and highlighting how projects in jurisdictions with a registered and ongoing JNR FREL must apply the JNR requirements and disregard these new modules. |
| Verra Response | Addressed via the note in section 2 that the jurisdictional proponent is responsible for generating and allocating the project this information that <i>AUDef</i> refers to Verra as providing. |
| Aster Global Assessment | The assessment team was unable to identify the referenced note in section 2. |
| Aster Global Initial Findings | CL: Please clarify how this comment is addressed. |
| Round 1 Response from | Revised Verra response to original comment: The methodology has been changed so that (per the note in section 2 of the <i>AUDef</i> module) where a project is to be nested in a registered JNR Scenario 1 or 2 program, the jurisdictional proponent is responsible for generating and allocating activity data to |

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| Methodology Developer | projects. |
| | Explanation of original Verra response: Clarified that the note is part of the module |
| Aster Global Findings Round 2 | The methodology developer has provided additional context regarding the referenced note. The assessment team determined the comment has been appropriately addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The methodology has been changed so that (per the note in section 2 of the AUDef module) where a project is to be nested in a registered JNR Scenario 1 or 2 program, the jurisdictional proponent is responsible for generating and allocating activity data to projects. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 361 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including general questions & comments | MON-AUD - it seems that the project proponent will be responsible for completing the sample based assessment of area of LCT over the monitoring period. If, for the BSL assessment, is done by an external group how easy will it be to replicate for the PP? F-NF transitions can be quite subjective to discern using high resolution satellite imagery. Repeatability could be a concern given the observer will be different. |
| Proposed Change(s) | Digitize the process as quickly as possible (see Wildlife Work's ArcMap plugin) and provide guidance to ensure observers review the BSL sample point assessments. |
| Verra Response | We will do this! |
| Aster Global Assessment | The methodology developer appears to have taken due account of the commenter's suggestion, as it is stated that it will be incorporated. However, it is unclear if and how this suggestion was incorporated. |
| Aster Global Initial Findings | CL: Please clarify if and how this suggestion was incorporated. |
| Round 1 Response from Methodology Developer | Revised Verra response to original comment: We will digitalize the process as quickly as possible after approval of the final methodology. It is possible that we will make the SOPs of DSPs for AD collection publicly available. Explanation of original Verra response: The original response was intended to point to a future action, not something that has been done already |
| Aster Global Findings Round 2 | The additional context provided in the updated response is sufficient to close the identified finding. |
| Status | closed R2 |

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| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | We will digitalize the process as quickly as possible after approval of the final methodology. It is possible that we will make the SOPs of DSPs for AD collection publicly available. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 362 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including general questions & comments | Application guide: Verra to define the jurisdictional boundary? This will require local knowledge so better coming from the PP with approval from Verra. |
| Verra Response | Based on stakeholder input, Verra is defining the jurisdictions at the highest reasonable level. |
| Aster Global Assessment | It is unclear what stakeholder input informed this decision, and what how the "highest reasonable level" was determined. |
| Aster Global Initial Findings | CL: Please clarify how stakeholder input informed Verra's decision to define jurisdictions. CL: Please clarify how the "highest reasonable level" was determined. |
| Round 1 Response from Methodology Developer | <p>Revised Verra response to original comment: Verra sought input from stakeholders including the JNR Advisory group, project proponents, pre-approved potential data service providers and folks involved in developing the UDef-RP in deciding the largest reasonable scale at which to define a jurisdiction for AD collection and allocation. It had to be an area that would not require months to collect data for and map (i.e., all of Brazil) but where we could cover as many potential project areas as possible at one time.</p> <p>As outlined in Appendix 4, PPs and governments may also submit recommendations for the definition of the jurisdictional boundaries. Verra will also consider existing expressions of government intent to use non-administrative boundaries, described in section A1.2.1.</p> <p>Explanation of original Verra response: Lacked detail</p> |
| Aster Global Findings Round 2 | The additional detail provided in the updated response addresses the issued findings. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |

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| Revised Verra Response October 2023 | <p>Verra sought input from stakeholders including the JNR Advisory group, project proponents, pre-approved potential data service providers and folks involved in developing the UDef-RATP in deciding the largest reasonable scale at which to define a jurisdiction for AD collection and allocation. It had to be an area that would not require months to collect data for and map (i.e., all of Brazil) but where we could cover as many potential project areas as possible at one time.</p> <p>As outlined in AUDef Appendix 4, PPs and governments may also submit recommendations for the definition of the jurisdictional boundaries. Verra will also consider existing expressions of government intent to use non-administrative boundaries, described in section A1.2.1.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 363 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Silvestrum Climate Associates |
| Reviewer Country | The Netherlands |
| Response(s) - including general questions & comments | Application guide: 'Until further notice, the JNR-RMT is the only risk mapping approach that can be applied for the allocation of baseline jurisdictional activity data to AUD projects.' This isn't very fair given this tool is yet to be finalized. |
| Proposed Change(s) | Do not release these modules until the RMT is finalized |
| Verra Response | AUDef will not be released until the UDef-RP is published. |
| Aster Global Assessment | The assessment team does not have a version of the UDef-RP. |
| Aster Global Initial Findings | CL: Please provide the assessment team with a copy of the current UDEF-RP. |
| Round 1 Response from Methodology Developer | Response to additional point raised by Aster: The UDef-RP has been shared with Aster |
| Aster Global Findings Round 2 | The assessment team has been provided Udef-RP. The assessment team is reasonably assured that that Verra will ensure the draft version provided is complete prior to publishing the modules, thus addressing the commenter's concern. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The Udef-RAT will be published along with AUDef will not be released until the UDef-RP is published. |

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| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 364 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Systemiq |
| Reviewer Country | Germany |
| Response(s) - including general questions & comments | <i>AD Provider:</i> It is currently unclear what the requirements are to be approved as a third party AD developer. |
| Proposed Change(s) | The development of clear guidelines or standard operating procedures (SOPs) for the development of AD to ensure consistency across VCS AUDD projects and to allow project developers to assess their internal capacity to propose AD. |
| Verra Response | Activity data service provider requirements are listed in the rolling expression of interest (https://verra.org/wp-content/uploads/EOI-Allocation-Data-service-providers.pdf) and periodic requests for proposals (e.g., https://verra.org/wp-content/uploads/2023/04/RFP-Dvpt-of-Jurisdictional-AD-and-FCBMs-for-VCS-AUDef-Projects-17-Apr-2023.pdf). Risk mapping providers will be subject to the criteria set out in a yet-to-be-released request for proposal. |
| Aster Global Assessment | The assessment team reviewed the documents provided in response to the commenter's question regarding requirements to be a third party add developer. The documents contain information on establishing SOPs that are sufficient to answer the commenter's question. Item addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | Activity data service provider requirements are listed in the rolling expression of interest (https://verra.org/wp-content/uploads/EOI-Allocation-Data-service-providers.pdf) and periodic requests for proposals (e.g., https://verra.org/wp-content/uploads/2023/04/RFP-Dvpt-of-Jurisdictional-AD-and-FCBMs-for-VCS-AUDef-Projects-17-Apr-2023.pdf). Risk mapping providers will be subject to the criteria set out in a yet-to-be-released request for proposal. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 365 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Systemiq |
| Reviewer Country | Germany |
| Response(s) - including general | Risk Map: Further guidance is needed on techniques to successfully implement the risk map beyond the 'default' approach currently outlined. |

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| questions & comments | |
| Proposed Change(s) | We request that VERRA provide case studies and SOPs for what constitutes acceptable risk mapping approaches for a given circumstance (e.g.: Types of drivers, regions, landscapes) |
| Verra Response | <p>The UDef-RP is currently being revised; the new version includes a clear statistical process to compare the Verra benchmark risk map with any other risk map.</p> <p>Verra and others have now tested the <i>UDef-RP</i> and <i>UDef-AP</i> enough to know that while the process is likely to generate lower emission reduction baselines in some cases, in other cases those baselines will be higher. We hope to make some of these tests public soon.</p> |
| Aster Global Assessment | The assessment team does not have a version of the module/tool nor evidence of the case studies and SOPs requested to determine if this response is sufficient to address the commenter's concern. |
| Aster Global Initial Findings | CL: Please provide the assessment team with a copy of the current UDEF-RP and any evidence that can be provided regarding the referenced tests. |
| Round 1 Response from Methodology Developer | Response to additional point raised by Aster: The UDef-RP has been shared with Aster |
| Aster Global Findings Round 2 | The assessment team has been provided with a copy of UDEF-RP, which includes the referenced statistical analyses. However, further analysis of this tool is outside the scope of the methodology. The assessment team believes the developer has taken due account of the initial comment. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>The risk mapping and allocation approach UDef-RP is currently being revised; the new version includes a clear statistical process to compare the Verra benchmark risk map with any other risk map.</p> <p>Verra and others have now tested the <i>UDef-RATP</i> and <i>UDef-AP</i> enough to know that while the process is likely to generate lower emission reduction baselines in some cases, in other cases those baselines will be higher. We hope to make some of these tests public soon.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 366 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Systemiq |
| Reviewer Country | Germany |
| Response(s) - including general | <i>Risk Map</i> : As it is currently written, it would seem that project effectiveness could very much impact future project risk. Associating project effectiveness to a predictor of future deforestation does not establish a counterfactual or 'without project' scenario. Approaches to establish baselines should remain independent to project performance. |

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| questions & comments | |
| Proposed Change(s) | Baselines should be modeled using factors that are independent of project performance. If factors like local deforestation and distance to forest edge are used as a predictor, only the modeled location of those factors in an alternative scenario that starts immediately prior to project initiation should be used within the project area and leakage belt to project risk for the current validity period. |
| Verra Response | The <i>UDef-RP</i> utilizes distance to forest edge only to construct an initial ("the benchmark") deforestation risk model/map. Alternative, information-richer deforestation risk models/maps -which might include other relevant variables such as those mentioned in the comment- can be constructed and considered. The predictive ability of all the deforestation risk (alternative plus benchmark) maps under consideration are statistically compared and the one showing the greatest predictive ability is then selected as the best risk map; conditioned to a favorable expert validation, the map thus selected is then adopted as the "jurisdictional deforestation risk map". |
| Aster Global Assessment | The assessment team does not have a version of the UDef-RP. |
| Aster Global Initial Findings | CL: Please provide the assessment team with a copy of the current UDEF-RP. |
| Round 1 Response from Methodology Developer | Response to additional point raised by Aster: The UDef-RP has been shared with Aster |
| Aster Global Findings Round 2 | The assessment team has been provided with a copy of UDEF-RP, which includes the referenced statistical analyses. However, further analysis of this tool is outside the scope of the methodology. The assessment team believes the developer has taken due account of the initial comment. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The <i>UDef-RATP</i> utilizes distance to forest edge only to construct an initial ("the benchmark") deforestation risk model/map. Alternative, information-richer deforestation risk models/maps -which might include other relevant variables such as those mentioned in the comment- can be constructed and considered. The predictive ability of all the deforestation risk (alternative plus benchmark) maps under consideration are statistically compared and the one showing the greatest predictive ability is then selected as the best risk map; conditioned to a favorable expert validation, the map thus selected is then adopted as the "jurisdictional deforestation risk map". |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 367 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Systemiq |
| Reviewer Country | Germany |

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| Response(s) - including general questions & comments | Delays in development of third party AD development. Potential delays in AD development by a third party may have financial implication on projects. |
| Proposed Change(s) | Can VERRA provide further information on how it expects to mitigate delays and what measures it may take if verified AD is not completed within the stipulated period. |
| Verra Response | We will have deliverable-based contracts with data service providers. No project will be forced to transition to the new methodology until six months after data is available to be allocated for that project's jurisdiction. |
| Aster Global Assessment | The methodology developer clarified that deliverable based contracts with DSPs should mitigate delays and that projects will have 6 months after data is available in the jurisdiction. The assessment team determined this response is appropriate to address the commenter's question. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | We will have deliverable-based contracts with data service providers. No project will be forced to transition to the new methodology until six months after data is available to be allocated for that project's jurisdiction. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 368 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Systemiq |
| Reviewer Country | Germany |
| Response(s) - including general questions & comments | <i>Engagement with local non-JNR jurisdiction.</i> The methodology application process doesn't include a need to consult or inform local jurisdiction when not a JNR program |
| Proposed Change(s) | With current context (for example in Indonesia), it might be beneficial for Verra to offer a guidance or process to engage with local jurisdictions and/or coordinate such engagement |
| Verra Response | Verra's data service providers are all engaging with local governments to some extent. Where possible, we're analyzing government-produced activity data to verify whether it meets our requirements. |
| Aster Global Assessment | It is unclear how the methodology developer's response addresses the comment. |
| Aster Global Initial Findings | CL: Please clarify in line with findings. |
| Round 1 Response from Methodology Developer | Revised Verra response to original comment: Verra's data service providers are all engaging with local governments to some extent. Where possible, we're analyzing government-produced activity data to verify whether it meets our requirements. Verra is working to improve coordination with governments, including via the AD providers and directly. This includes participation in meetings, |

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| | <p>providing training to local governments, and providing an opportunity to review AD and risk mapping results.</p> <p>Explanation of original Verra response: Was written earlier when we didn't have as clear an approach; this is as specific as we can get at the moment</p> |
| Aster Global Findings Round 2 | The methodology developer has provided details on the current processes it is engaging to address the commenter's concern, which the assessment team considers sufficient to close the identified finding. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Verra's data service providers are all engaging with local governments to some extent. Where possible, we're analyzing government-produced activity data to verify whether it meets our requirements. Verra is working to improve coordination with governments, including via the AD providers and directly. This includes participation in meetings, providing training to local governments, and providing an opportunity to review AD and risk mapping results. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 369 |
| Question | General |
| Section | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | TNC broadly supports the transition of nature-based carbon projects toward jurisdictional approaches. |
| Verra Response | N/A |
| Aster Global Assessment | No response required. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | N/A |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 370 |
| Question | General |

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| Section | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Concerned about these new modules limiting accessibility to carbon markets again. In recent years the availability of GFW data and GEE has had a profound effect on projects being able to quickly and cheaply arrive at an estimate of climate impact and offset yield to understanding project viability. The new modules – unless FREL and risk map and activity data are already available due to a previous project – creates significant disadvantage for first movers and innovators protecting critical forests. These are substantial costs for project to get the AD generation and allocation data without knowing if the project is in any way viable. |
| Verra Response | <p>GFW and other data will still provide a reasonable estimate of climate impact for projects in their planning phases.</p> <p>We will post activity data and risk maps publicly as soon as they are developed. No project will be forced to transition to the new methodology until six months after data is available to be allocated for that project's jurisdiction.</p> |
| Aster Global Assessment | It is unclear how the methodology developer's response addresses the comment. |
| Aster Global Initial Findings | CL: Please clarify in line with findings. |
| Round 1 Response from Methodology Developer | <p>Revised Verra response to original comment:</p> <p>We understand the stakeholder's concern in the transition period between the old methodologies and the new one and in the period around transition between baseline validity periods. GFW and other data will still provide a reasonable estimate of climate impact for projects in their planning phases, and projects are able to simulate application of the AUDef methodology to approximate a plausible range of AD allocation.. GFW and other similar pixel-count estimates of deforestation are not area-bias corrected and therefore do not meet the emerging best practices such as articulated by the ICVCM Core Carbon Principles that all elements of estimation of ERs are accompanied by estimates of uncertainty.</p> <p>We will post activity data and risk maps publicly as soon as they are developed. No project will be forced to transition to the new methodology until six months after data is available to be allocated for that project's jurisdiction.</p> <p>Explanation of original Verra response:</p> <p>Has been revised to highlight how it corresponds to stakeholder's key point</p> |
| Aster Global Findings Round 2 | The methodology developer has provided additional clarification on how project proponent's will still be able to feasibly estimate climate impacts as well as the justification for the chosen approach. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | We understand the stakeholder's concern in the transition period between the old methodologies and the new one and in the period around transition between baseline validity periods. GFW and other data will still provide a reasonable estimate of climate impact for projects in their planning phases, and projects are able to simulate application of the AUDef methodology to approximate a plausible range of AD allocation.. GFW and other similar pixel-count estimates of deforestation are not area- |

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| | <p>bias corrected and therefore do not meet the emerging best practices such as articulated by the ICVCM Core Carbon Principles that all elements of estimation of ERs are accompanied by estimates of uncertainty.</p> <p>We will post activity data and risk maps publicly as soon as they are developed. No project will be forced to transition to the new methodology until six months after data is available to be allocated for that project's jurisdiction.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 371 |
| Question | General |
| Section | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | Concerned about VERRA's capacity to deliver products such as activity data etc. at the needed speed and cost. Look at current response rates for project registry uploads and project responses. Having undertaken and funded some of this work, it seems unlikely these could be delivered for \$50-70K USD, as suggested in the presentation. |
| Verra Response | We have revised our expectations and budget for data services and are looking at low-cost, quicker ways of data development for future jurisdictions. |
| Aster Global Assessment | Several comments have raised questions about fees. Given that Verra has already set expectations (as referenced by comment), the assessment team asks Verra to respond with more specificity. |
| Aster Global Initial Findings | CL: Please clarify in line with findings. |
| Round 1 Response from Methodology Developer | <p>Verra has centralized the approach because requiring every project to do this would 1) cause a huge replication of effort and duplication of cost and disruption to government officials and other projects (as every project sought to collect data); and 2) Result in potentially contradictory data that undermines confidence in quality.</p> <p>Fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects. Our intention is to ensure that most projects benefit from having baseline data given to them.</p> |
| Aster Global Findings Round 2 | The methodology developer has provided additional clarification and indicated that financial considerations will not be shared at this point. The assessment team determined this item is assessed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>Verra has centralized the approach because requiring every project to do this would 1) cause a huge replication of effort and duplication of cost and disruption to government officials and other projects (as every project sought to collect data); and 2) Result in potentially contradictory data that undermines confidence in quality.</p> <p>Fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and</p> |

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| | in a way that does not burden projects. Our intention is to ensure that most projects benefit from having baseline data given to them. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 372 |
| Question | General |
| Section | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | It would be useful for Verra to highlight major changes in the process resulting from these new revisions. |
| Verra Response | See the slides from the webinar we hosted on 20 April 2023 re: the draft methodology (https://verra.org/wp-content/uploads/2023/04/2023.04.20-overview-of-M0184-Verra.pdf); we will also host webinars when the methodology is published. |
| Aster Global Assessment | The assessment team reviewed the slides from the webinar and determined that they are sufficient in describing major updates between versions, thus addressing the commenters suggestion. Future webinars were also determined to be a sufficient means of future updates. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | See the slides from the webinar we hosted on 20 April 2023 re: the draft methodology (https://verra.org/wp-content/uploads/2023/04/2023.04.20-overview-of-M0184-Verra.pdf); we will also host webinars when the methodology is published. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 373 |
| Question | General |
| Section | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | AUD- Methodological Application Guide: There are general concerns about the capacity of Verra to deliver the Activity Data Baseline for UD in a timely manner and cost-effective. Taking into consideration that there is a backlog of almost 2y of projects and a very ambitious carbon market out there. It might be more interesting to develop guidelines/requirements so any organization can replicate the process. Project developers often do several assessments to understand the feasibility of a REDD project before submitting a PDD, and it might be unfeasible to request (and pay) for this activity data at the feasibility stage. |

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| | <p>It is important to clarify in this document the timeline to produce/deliver the outputs that will be under responsibility of Verra. Although some information was shared in the webinars regarding the fee process and cost sharing, no information is provided in the revised documents. In addition, further guidance is needed to reconcile the activity data produced by Verra with government official data.</p> |
| Verra Response | <p>GFW and other data will still provide a reasonable estimate of climate impact for projects in their planning phases. We will post activity data and risk maps publicly as soon as they are developed. No project will be forced to transition to the new methodology until six months after data is available to be allocated for that project's jurisdiction. We have revised our expectations and budget for data services and are looking at low-cost, quicker ways of data development for future jurisdictions. Since this comment was made, Verra has reduced the project review backlog significantly</p> <p>Verra fees are not included in methodologies. Guidance on how to reconcile government FRELs with Verra-produced activity data is a higher-level issue that needs to be built into the VCS Registration and Issuance Process. Since VCS projects need to follow all applicable laws and regulations, if there is a government program in place that mandates the number of credits a project may issue, it may only issue the lower amount permitted by the government or Verra.</p> |
| Aster Global Assessment | <p>Verra's responses to public comments have hinted at public release of some data but not others. It is unclear exactly what data--which are part of the AD Allocation Report--will be released to the public and at what level of detail.</p> |
| Aster Global Initial Findings | <p>CL: Please clarify in line with finding.</p> |
| Round 1 Response from Methodology Developer | <p>Updated Verra response to original comment: GFW and other data will still provide a reasonable estimate of climate impact for projects in their planning phases. We will post FCBMs and risk maps publicly as soon as they are developed. No project will be forced to transition to the new methodology until six months after data is available to be allocated for that project's jurisdiction. We have revised our expectations and budget for data services and are looking at low-cost, quicker ways of data development for future jurisdictions. Since this comment was made, Verra has reduced the project review backlog significantly</p> <p>Verra fees are not included in methodologies. Guidance on how to reconcile government FRELs with Verra-produced activity data is a higher-level issue that needs to be built into the <i>VCS Registration and Issuance Process</i>. Since VCS projects need to follow all applicable laws and regulations, if there is a government program in place that mandates the number of credits a project may issue, it may only issue the lower amount permitted by the government or Verra.</p> <p>Explanation of Verra's original response: included AD instead of FCBM</p> <p>Verra response to Aster's additional points: Verra will release the following publicly for each jurisdictional BVP: - FCBM - Risk map</p> |
| Aster Global Findings Round 2 | <p>The methodology developer has provided a response to the assessment team's finding regarding the data that will be released. This in conjunction with the revised response are sufficient to close the identified finding.</p> |
| Status | <p>closed R2</p> |

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| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>-GFW and other data will still provide a reasonable estimate of climate impact for projects in their planning phases.</p> <p>-We will post FCBMs and risk maps publicly as soon as they are developed. No project will be forced to transition to the new methodology until six months after data is available to be allocated for that project's jurisdiction.</p> <p>-We have revised our expectations and budget for data services and are looking at low-cost, quicker ways of data development for future jurisdictions.</p> <p>-Since this comment was made, Verra has reduced the project review backlog significantly</p> <p>-Verra fees are not included in methodologies.</p> <p>-Guidance on how to reconcile government FRELS with Verra-produced activity data is a higher-level issue that needs to be built into the <i>VCS Registration and Issuance Process</i>. Since VCS projects need to follow all applicable laws and regulations, if there is a government program in place that mandates the number of credits a project may issue, it may only issue the lower amount permitted by the government or Verra.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 374 |
| Question | General |
| Section | N/A |
| Reviewer Organization | The Nature Conservancy (TNC) |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>J-ADB UD module</p> <p>The J-ADB UD module is very general and does not provide enough guidance for PP to apply in the feasibility phases before making the decision to pursue the conservation project as a carbon crediting project. Project might have modifications in the design phase as area and activities are discussed with stakeholders, therefore is it expected that the J-ADB UD provide enough guidance for the PP to understand the impact of such decisions before submitting the project and leakage belt areas. Another potential example is the planned deforestation in/excluded in the AD by Verra, considering that such information is not always transparently available, but PP or local stakeholders might have access</p> |
| Verra Response | <p>Verra will publish all jurisdictional risk maps as they are released, which should help in project proponent decision-making.</p> <p>See Appendix 4 for details on the supplemental materials stakeholders can submit to supplement the activity data collection process.</p> |
| Aster Global Assessment | The assessment team determines Verra's response to be adequate. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra | Verra will publish all jurisdictional risk maps as they are released, which should help in project proponent decision-making. |

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| Response October 2023 | See AUDef Appendix 4 for details on the supplemental materials stakeholders can submit to supplement the activity data collection process. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 375 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Volkswagen-Climate Partner |
| Reviewer Country | Germany |
| Response(s) - including general questions & comments | Validation and verification of new or existing nested projects have been put on hold, and potential new projects are uncertain about where/when to start. |
| Proposed Change(s) | <p>Establish a fixed and transparent transition period and allow all new projects and baseline revaluation projects to register under the old methodologies and only update to the new methodologies at their baseline reevaluation time.</p> <p>Rationale: The uncertainty regarding the final rules of the new modules as well as the unknown waiting time until these changes are firm is holding up project development and impacting investment. Historically, Verra hasn't been firm with deadlines and has often taken too long to implement new methodologies/procedures. Projects cannot afford the extra waiting time.</p> |
| Verra Response | See the Verra website post Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits for information on projects' transition to the new methodology. |
| Aster Global Assessment | The methodology developer directed the commenter to a website post that explains project transition to the methodology. While the website post does include timelines regarding adoption of the new methodology, it is unclear how referencing this post addresses the commenters concern regarding the uncertainty of the final rules and the noted impacts to project development and investing. |
| Aster Global Initial Findings | CL: Please clarify in line with findings. |
| Round 1 Response from Methodology Developer | <p>Updated Verra response to original comment: Validation and verification of REDD projects has not been put on hold. See the Verra website post "Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits" for information on projects' transition to the new methodology.</p> <p>Verra is trying not to hold up project development while initiating transition to the new methodology as quickly as possible in order to give the market confidence.</p> <p>Explanation of Verra's original response: We added a bit on the need to transition, but this comment is long out of date.</p> |
| Aster Global Findings Round 2 | The additional detail provided in the updated response addresses the issued findings. Item closed. |
| Status | closed R2 |
| Response Updated | wording/typo updates |

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| Since Finding Closed? | |
| Revised Verra Response October 2023 | <p>Validation and verification of REDD projects has not been put on hold. See the Verra website post "Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits" (https://verra.org/consolidated-redd-methodology-ensures-integrity-of-forest-conservation-credits/) for information on projects' transition to the new methodology.</p> <p>Verra is trying not to hold up project development while initiating transition to the new methodology as quickly as possible in order to give the market confidence.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 376 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Wildlife Conservation Society (WCS) |
| Reviewer Country | Rwanda |
| Response(s) - including general questions & comments | See attached document. |
| Verra Response | <p>The historical reference period is set out in the standard; it is currently 10 years.</p> <p>VCS projects will be included in the jurisdiction during the HRP. In the jurisdictional allocation approach, projects no longer construct a "reference region" (Appendix 1 A1.2.1).</p> <p>Based on stakeholder input, Verra is defining the jurisdictions at the highest reasonable level.</p> <p><i>AUDef</i> covers only avoiding unplanned deforestation; in time, modules for avoiding planned deforestation and unplanned forest degradation will be added to M0184. For ARR, the forthcoming VCS ARR meth will need to be combined with M0184.</p> <p>The <i>UDef-RP</i> is currently being revised.</p> <p>Verra has to engage with a third party as data service provider in order to ensure that it can provide quality control over the data that third party provides.</p> <p>Data service providers will conduct the outside the leakage belt analysis. The rural-urban fraction has been removed.</p> <p>JNR recommendations are not relevant to <i>AUDef</i>.</p> |
| Aster Global Assessment | The Assessment Team reviewed the public comment PDF and has broken down each individual comment below. Closure of this is pending closure of sub-comments. |
| Round 1 Response from | See responses in comments below |

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| Methodology Developer | |
| Status | drafted |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | N/A |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 376.01 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Wildlife Conservation Society (WCS) |
| Reviewer Country | Rwanda |
| Response(s) - including general questions & comments | <p>J-ADB-UD ACTIVITY DATA DEVELOPMENT</p> <p><u>Length of historical reference period</u> - The module currently specifies that the activity data validity period is 6 years, but it does not specify a period for the historical reference period. Rather, it indicates that it should be determined “according to the latest version of the VCS Standard.” The VCS standard does not yet specify a historical reference period. Instead, we advocate that a 10 or 15-year historical reference period be incorporated within the module itself. A longer historical reference period allows more stability in projections (less noise from short-term economic cycles and fewer data artifacts of remote sensing), and provides more predictability to project developers.</p> <p>Another practical consideration is that the period 2011-2014 is in general tricky for making good maps, as there are not any good radar satellite in orbit, Sentinels is not yet launched, and there is little good Landsat data yet. Remote sensing experts should be able to have more flexibility in selecting data points, as it is more important to have good data rather than meet a specific targeted year of collection.</p> <p>A shorter historical period does not improve environmental integrity of offsets, but it does create more practical challenges for project developers.</p> |
| Verra Response | <p>The historical reference period is set out in the standard; it is currently 10 years.</p> <p>VCS projects will be included in the jurisdiction during the HRP. In the jurisdictional allocation approach, projects no longer construct a "reference region" (Appendix 1 A1.2.1).</p> |
| Aster Global Assessment | Verra claims the historical reference period is 10 yr. per the VCS Standard; however the Assessment Team is unable to corroborate this. If it is not defined in the VCS Standard, will the methodology define the HRP or consider a longer period, per the commenter's request. And will Verra address the two other comments? |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |

| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The definition of historical reference period (HRP) for Avoiding Unplanned Deforestation projects is set out in Section 3.4.15(2) of the <i>VCS Methodology Requirements v4.3</i> (HRP is defined in the methodology by referring to the <i>Methodology Requirements</i>). It has not been changed in recent years and will not be affected by the introduction of this methodology since it is a VCS Program level (and out of the scope of this methodology consultation).</p> <p>We are adding a sentence to clarify that data within +/-365 days of the start and end date of the HRP can be used to allow for satellite imagery availability for plot interpretation; see section A1.4.1 - Data sources of the Module.</p> <p>Explanation of original response: Mistakenly referred to the <i>Standard</i> instead of the <i>Meth Requirements</i>. The HRP is out of scope of this methodology assessment (we did consider reducing it, but feedback to a VCS Program public consultation was mixed and the science was inconclusive). The revised response takes into account commenter's statements around data availability.</p> | | | | | | | | |
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| Aster Global Findings Round 2 | <p>The assessment team notes that clarification has been provided that the HRP comes from the Meth Requirements, not the standard, and has remained fixed for several years. This item is addressed.</p> <p>The inclusion of the referenced sentence has provided additional flexibility, as indicated by the comment. Further clarification regarding the HRP is sufficient to close the last portion of the comment.</p> | | | | | | | | |
| Status | closed R2 | | | | | | | | |
| Response Updated Since Finding Closed? | wording/typo updates | | | | | | | | |
| Revised Verra Response October 2023 | See comment #127 | | | | | | | | |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. | | | | | | | | |
| Comment # | 376.02 | | | | | | | | |
| Question | General | | | | | | | | |
| Section | N/A | | | | | | | | |
| Reviewer Organization | Wildlife Conservation Society (WCS) | | | | | | | | |
| Reviewer Country | Rwanda | | | | | | | | |
| Response(s) - including general questions & comments | <table border="0"> <thead> <tr> <th style="text-align: left;">J-ADB-UD</th> <th style="text-align: center;">ACTIVITY</th> <th style="text-align: center;">DATA</th> <th style="text-align: center;">DEVELOPMENT</th> </tr> </thead> <tbody> <tr> <td colspan="4"> <p><u>Reference area for assessment of historical deforestation</u> - The current approach to historical AD development includes observations of imagery taken from within the boundaries of existing registered and active VCS projects themselves, as well as within non-project areas. This means that the activity data reference level is no longer independent of the performance of existing VCS projects taking place within the jurisdiction. However, the VCS states that a Baseline Scenario is "activities and GHG emissions that would occur in the absence of the project activity." Thus, the current approach within the module is not in line with the existing definition and therefore it is</p> </td> </tr> </tbody> </table> | J-ADB-UD | ACTIVITY | DATA | DEVELOPMENT | <p><u>Reference area for assessment of historical deforestation</u> - The current approach to historical AD development includes observations of imagery taken from within the boundaries of existing registered and active VCS projects themselves, as well as within non-project areas. This means that the activity data reference level is no longer independent of the performance of existing VCS projects taking place within the jurisdiction. However, the VCS states that a Baseline Scenario is "activities and GHG emissions that would occur in the absence of the project activity." Thus, the current approach within the module is not in line with the existing definition and therefore it is</p> | | | |
| J-ADB-UD | ACTIVITY | DATA | DEVELOPMENT | | | | | | |
| <p><u>Reference area for assessment of historical deforestation</u> - The current approach to historical AD development includes observations of imagery taken from within the boundaries of existing registered and active VCS projects themselves, as well as within non-project areas. This means that the activity data reference level is no longer independent of the performance of existing VCS projects taking place within the jurisdiction. However, the VCS states that a Baseline Scenario is "activities and GHG emissions that would occur in the absence of the project activity." Thus, the current approach within the module is not in line with the existing definition and therefore it is</p> | | | | | | | | | |

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| | <p>recommended that either the definition of Baseline needs to be clarified within the VCS Standard, or the J-ADB-UD needs to be modified to exclude existing registered and active VCS project areas from the jurisdictional area of AD assessment. Without modification, what is produced by the J-ADB-UD and, thus in turn, BL-UD is actually "activities and GHG emission that will occur based on the continued impact of existing emission reduction project activities." We recommend that historical deforestation only be assessed within areas of the jurisdiction not included within any VCS registered and active project areas, and then the AD scaled up to consider the proportion of at-risk forest already under protection.</p> |
| Verra Response | <p>VCS projects will be included in the jurisdiction during the HRP. In the jurisdictional allocation approach, projects no longer construct a "reference region" (Appendix 1 A1.2.1).</p> |
| Aster Global Assessment | <p>Verra has reaffirmed projects will be included in the jurisdiction but has not given justification nor provided clarity given the commenter's understanding of 'baseline'.</p> |
| Aster Global Initial Findings | <p>CL: Please clarify in line with finding.</p> |
| Round 1 Response from Methodology Developer | <p>Updated Verra response to original comment: VCS projects will be included in the jurisdiction during the HRP. In the jurisdictional allocation approach, projects no longer construct a "reference region" (Appendix 1 A1.2.1). Instead, the baseline scenario is allocated based on risk of deforestation in the entire jurisdiction that includes the impact of any existing project impacts in the jurisdiction. This is a more conservative approach than excluding project impacts.</p> <p>While in the near term it would be unworkable to exclude project impacts when developing jurisdictional forest cover benchmark maps (due to lack of data availability), this is something that we're considering for the long term.</p> <p>Explanation of original response: Lacked detail - we missed this in providing the up-to-date cross reference</p> |
| Aster Global Findings Round 2 | <p>The methodology developer has provided clarification to the commenter's understanding of the baseline, noting that the baseline scenario is allocated based on risk of deforestation in the entire jurisdiction, including impacts of existing projects.</p> <p>The methodology developer's response does not address the discrepancy in the definition of "baseline scenario" identified by the public comment.</p> <p>It is unclear to the assessment team what the methodology developer means by a "lack of data availability."</p> |
| Round 2 NCR/CL/OFI2 | <p>CL: Please provide additional clarification to address the commenter's concern related to the conflicting definitions noted.</p> <p>CL: Please clarify which data are not available that would make this change unworkable.</p> |
| Round 2 Response from Methodology Developer | <p>Updated Verra response to original comment: VCS projects will be included in the jurisdiction during the HRP. In the jurisdictional allocation approach, projects no longer construct a "reference region" (Appendix 1 A1.2.1). Instead, the baseline scenario is allocated based on risk of deforestation in the entire jurisdiction that includes the impact of any existing project impacts in the jurisdiction. This is a more conservative approach than excluding project impacts.</p> <p>While in the near term it would be unworkable to exclude project impacts when developing jurisdictional forest cover benchmark maps (because Verra does not have the required data for any and all carbon projects in the area), this is something that we're considering for the long term as Verra improves its own data, and global databases including all carbon projects are established.</p> |

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| | <p>The definition of 'baseline scenario' is being revised via a clarification to the <i>VCS Methodology Requirements</i> to “The criteria and procedures for establishing the baseline scenario in the frontier and mosaic configurations shall take into account such factors as historical deforestation and/or degradation rates and require. The project proponent to shall develop a baseline by using activity data provided by Verra or determining and analyzing a reference area...” (blue text removed, green text added).</p> <p>We considered changing the definition in the <i>VCS Standard</i> as well, but the VCS Methodologies Director deemed the activity data allocated to the project as representative of "the activities and GHG emissions that would occur in the absence of the the project activity".</p> <p>Response to Aster: parts of paragraph 2 edited and paragraphs 3 and 4 added</p> |
| Aster Global Findings Round 3 | Following expanded clarification from Verra and additional confirmation from the VCS Methodologies Director, the Assessment Team judges this response as sufficiently addressing the original comment. Verra has also clarified that 'lack of data' referred to global datasets of all carbon projects. |
| Status | closed R3 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>Updated Verra response to original comment: VCS projects will be included in the jurisdiction during the HRP. In the jurisdictional allocation approach, projects no longer construct a "reference region" (AUNDef Appendix 1 A1.2.1). Instead, the baseline scenario is allocated based on risk of deforestation in the entire jurisdiction that includes the impact of any existing project impacts in the jurisdiction. This is a more conservative approach than excluding project impacts.</p> <p>While in the near term it would be unworkable to exclude project impacts when developing jurisdictional forest cover benchmark maps (because Verra does not have the required data for any and all carbon projects in the area), this is something that we're considering for the long term as Verra improves its own data, and global databases including all carbon projects are established.</p> <p>The definition of 'baseline scenario' is being revised via a clarification to the <i>VCS Methodology Requirements</i> to “The criteria and procedures for establishing the baseline scenario in the frontier and mosaic configurations shall take into account such factors as historical deforestation and/or degradation rates and require. The project proponent to shall develop a baseline by using activity data provided by Verra or determining and analyzing a reference area...” (blue text removed, green text added).</p> <p>We considered changing the definition in the <i>VCS Standard</i> as well, but the VCS Methodologies Director deemed the activity data allocated to the project as representative of "the activities and GHG emissions that would occur in the absence of the project activity".</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 376.03 |
| Question | General |

| Section | N/A | | | | | | | | |
|---|---|----------|-------------|------|-------------|---|--|--|--|
| Reviewer Organization | Wildlife Conservation Society (WCS) | | | | | | | | |
| Reviewer Country | Rwanda | | | | | | | | |
| Response(s) - including general questions & comments | <table border="1"> <thead> <tr> <th>J-ADB-UD</th> <th>ACTIVITY</th> <th>DATA</th> <th>DEVELOPMENT</th> </tr> </thead> <tbody> <tr> <td colspan="4"> <p><u>Spatial definition of Jurisdiction</u> - We recommend that the allowable definition of the "Jurisdiction" be expanded to accommodate either 1) other existing jurisdictions recognized by the host government and defined for the purpose of implementing a REDD+ program (e.g. FCPF program area), or 2) any government derived documentation of expected plans to implement a jurisdictional program based on a unit other than an administrative unit. As long as minimum size criteria can be met, the views of the host governments on jurisdiction definition should always take priority.</p> </td> </tr> </tbody> </table> | J-ADB-UD | ACTIVITY | DATA | DEVELOPMENT | <p><u>Spatial definition of Jurisdiction</u> - We recommend that the allowable definition of the "Jurisdiction" be expanded to accommodate either 1) other existing jurisdictions recognized by the host government and defined for the purpose of implementing a REDD+ program (e.g. FCPF program area), or 2) any government derived documentation of expected plans to implement a jurisdictional program based on a unit other than an administrative unit. As long as minimum size criteria can be met, the views of the host governments on jurisdiction definition should always take priority.</p> | | | |
| J-ADB-UD | ACTIVITY | DATA | DEVELOPMENT | | | | | | |
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| Verra Response | Based on stakeholder input, Verra is defining the jurisdictions at the highest reasonable level. | | | | | | | | |
| Aster Global Assessment | The assessment team notes that the Module has revised the delineation of jurisdictions; this includes possible consultation with govts, or default setting at the natl level. | | | | | | | | |
| Status | closed R1 | | | | | | | | |
| Response Updated Since Finding Closed? | no | | | | | | | | |
| Revised Verra Response October 2023 | Based on stakeholder input, Verra is defining the jurisdictions at the highest reasonable level. | | | | | | | | |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. | | | | | | | | |
| Comment # | 376.04 | | | | | | | | |
| Question | General | | | | | | | | |
| Section | N/A | | | | | | | | |
| Reviewer Organization | Wildlife Conservation Society (WCS) | | | | | | | | |
| Reviewer Country | Rwanda | | | | | | | | |
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| J-ADB-UD | ACTIVITY | DATA | DEVELOPMENT | | | | | | |
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| | The inclusion of degradation is important because it a) allows the carbon market to incentivize protection activities in major hotspots of degradation and 2) it better accounts for leakage between deforestation and degradation in locations where those processes are closely linked. | | | | | | | | | | | | | | | | |
|--|---|----------|-------------|------|-------------|--|--|--|--|--|--|--|--|---|--|--|--|
| Verra Response | AUDef covers only avoiding unplanned deforestation; in time, modules for avoiding planned deforestation and unplanned forest degradation will be added to M0184. For ARR, the forthcoming VCS ARR meth will need to be combined with M0184. | | | | | | | | | | | | | | | | |
| Aster Global Assessment | Verra confirmed the scope of this methodology is only deforestation but stated that degradation and ARR will be in separate methodologies. | | | | | | | | | | | | | | | | |
| Status | closed R1 | | | | | | | | | | | | | | | | |
| Response Updated Since Finding Closed? | no | | | | | | | | | | | | | | | | |
| Revised Verra Response October 2023 | AUDef covers only avoiding unplanned deforestation; in time, modules for avoiding planned deforestation and unplanned forest degradation will be added to VM0048. For ARR, the forthcoming VCS ARR meth will need to be combined with VM0048. | | | | | | | | | | | | | | | | |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. | | | | | | | | | | | | | | | | |
| Comment # | 376.05 | | | | | | | | | | | | | | | | |
| Question | General | | | | | | | | | | | | | | | | |
| Section | N/A | | | | | | | | | | | | | | | | |
| Reviewer Organization | Wildlife Conservation Society (WCS) | | | | | | | | | | | | | | | | |
| Reviewer Country | Rwanda | | | | | | | | | | | | | | | | |
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| J-ADB-UD | ACTIVITY | DATA | DEVELOPMENT | | | | | | | | | | | | | | |
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| · The requirement of a “zero risk class” should be removed. The risk map should reflect, for each location, the actual amount of risk predicted by the selected model. Otherwise, risk maps result in inconsistent overriding of modeled results for some locations but not for others. | | | | | | | | | | | | | | | | | |
| Verra Response | The UDef-RP is currently being revised. | | | | | | | | | | | | | | | | |
| Aster Global Assessment | The commenter has asked for revision to the risk mapping procedure. The assessment team confirmed that the risk tool has been revised. However it is unclear if Verra take into account the suggested modifications. | | | | | | | | | | | | | | | | |
| Aster Global Initial Findings | CL: Please clarify in line with finding. | | | | | | | | | | | | | | | | |
| Round 1 Response from | Revised Verra comment addressing original public comment: 1)The risk tool has been updated based on significant work by Clark University. The tool now has the potential for alternate risk approaches to be raised and adopted | | | | | | | | | | | | | | | | |

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| Methodology Developer | <p>where they perform statistically better than the default approach. 2)The Zero class is still utilized for the bencharm approach, but is not a requirement for alternative risk models.</p> <p>Explanation of original Verra Response: Verra correctly highlighted that commenrs regarding risk mapping procedures are out of scope.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | significant change |
| Revised Verra Response October 2023 | <p>1)The risk tool has been updated based on significant work by Clark University. The tool now has the potential for alternate risk approaches to be raised and adopted where they perform statistically better than the default approach.</p> <p>2)The zZero class is now used to denote areas that have to be excluded from the analysis, such as areas of planned deforestation, areas of non-forest and areas outside the jurisdiction is still utilized for the bencharm approach, but is not a requirement for alternative risk models.</p> |
| Aster Global Assessment of Revised Response | The assessment team notes that significant changes were made in the revised response. However, these changes do not affect the assessment team's initial review and thus no further review is warranted. |
| Comment # | 376.06 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Wildlife Conservation Society (WCS) |
| Reviewer Country | Rwanda |
| Response(s) - including general questions & comments | <p>AD DATA PROVIDER</p> <p>It is requested that guidance be developed by Verra to indicate the procedures that can be taken to allow the eligibility of data developed when jurisdictional activity data has been developed by a 3rd party which complies with the requirements of the Module, but where that 3rd party was not contracted by Verra itself.</p> |
| Verra Response | <p>Verra has to engage with a third party as data service provider in order to ensure that it can provide quality control over the data that third party provides.</p> <p>Verra has to engage with a third party as data service provider in order to ensure that it can provide quality control over the data that third party provides.</p> |
| Aster Global Assessment | Verra clarifies that every DSP will be contracted by Verra and has given rationale. |

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| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Activity data service provider requirements are listed in the rolling expression of interest (https://verra.org/wp-content/uploads/EOI-Allocation-Data-service-providers.pdf) and periodic requests for proposals (e.g., https://verra.org/wp-content/uploads/2023/04/RFP-Dvpt-of-Jurisdictional-AD-and-FCBMs-for-VCS-AUDef-Projects-17-Apr-2023.pdf). Risk mapping providers will be subject to the criteria set out in a yet-to-be-released request for proposal. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 376.07 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Wildlife Conservation Society (WCS) |
| Reviewer Country | Rwanda |
| Response(s) - including general questions & comments | <p>RISK MAP (GENERAL)</p> <p>General:</p> <ul style="list-style-type: none"> · Guidance is needed for what constitute acceptable risk mapping techniques. We propose that Verra undertake a process to assess and provide guidelines for what approaches are acceptable and under what circumstances. Part of this assessment would ideally include case studies covering a range of drivers/regions/forest configurations. · WCS can offer to use two of our jurisdictions as case studies to inform such a process. |
| Verra Response | <p>The UDef-RP is currently being revised.</p> <p>Verra has to engage with a third party as data service provider in order to ensure that it can provide quality control over the data that third party provides.</p> |
| Aster Global Assessment | The commenter asks for addtl elaboration in the methodology, perhaps using examples. Verra has not directly responded to this request. |
| Aster Global Initial Findings | CL: Please clarify in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The risk tool has been updated based on significant work by Clark University. The tool now has the potential for alternate risk approaches to be raised and adopted where they perform statistically better than the default approach.</p> <p>Explanation of original Verra Response: Verra correctly highlighted that commenrs regarding risk mapping procedures are out of scope.</p> <p>Response to additional points raised by Aster: N?A</p> |

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| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The risk tool has been updated based on significant work by Clark University. The tool now has the potential for alternate risk approaches to be raised and adopted where they perform statistically better than the default approach. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 376.08 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Wildlife Conservation Society (WCS) |
| Reviewer Country | Rwanda |
| Response(s) - including general questions & comments | <p>RISK MAP (GENERAL) Use _____ of _____ localized _____ deforestation _____ as _____ a _____ predictor: Risk models should strongly discourage the use of predictors that are strongly influenced by project effectiveness. The Risk Map is one of the two key datasets used to establish the Baseline Activity Data for a project. If the Risk Map is closely correlated with past project effectiveness, then the resulting baseline ceases to be a counterfactual projection of activity data "in the absence of the project activity" as required _____ by _____ the _____ VCS.</p> <ul style="list-style-type: none"> · Localized observations of historical deforestation may indeed improve the technical accuracy of a risk map to predict near-term deforestation, however a baseline is not a projection of 'what will happen in the future' at a location, but rather what might plausibly happen in the absence of project activity. · Only approaches that maintain the independence of the risk map from project performance _____ should _____ be _____ permitted: <ul style="list-style-type: none"> o Use only explanatory factors that are not sensitive to project effectiveness o If factors like local deforestation and distance to forest edge are used as a predictor, only the modeled location of those factors in an alternative scenario that starts immediately prior to project initiation should be used within the PA and LB to project risk for the current validity period. This approach would likely require use of Markov chain, _____ cellular _____ automata, _____ or _____ similar _____ technique. · There should be no restriction on the length of the historical period used to calibrate |

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| | the risk model. Longer periods offer a better calibration period to assess the influence of explanatory factors that are not sensitive to project effectiveness. |
| Verra Response | The UDef-RP is currently being revised. Verra has to engage with a third party as data service provider in order to ensure that it can provide quality control over the data that third party provides. |
| Aster Global Assessment | The assessment team believes several suggestions have been made with regards to guidelines for risk mapping procedures. |
| Aster Global Initial Findings | CL: Please address the comment. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: The risk tool has been updated based on significant work by Clark University. The tool now has the potential for alternate risk approaches to be raised and adopted where they perform statistically better than the default approach. Explanation of original Verra Response: Verra correctly highlighted that comments regarding risk mapping procedures are out of scope. Response to additional points raised by Aster: N/A |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The risk tool has been updated based on significant work by Clark University. The tool now has the potential for alternate risk approaches to be raised and adopted where they perform statistically better than the default approach. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 376.09 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Wildlife Conservation Society (WCS) |
| Reviewer Country | Rwanda |
| Response(s) - including general questions & comments | LK-AUD Outside the leakage belt analysis: It is our recommendation that the products required for estimating outside leakage belt emissions should be developed by a 3rd party selected by Verra, not by project developers, for the same reason that a 3rd party develops the AD and forest maps. |

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| | Expecting projects to undertake it themselves will either result in conflicting national-scale datasets, or putting the onus on projects to collaborate and cost share. While collaboration might work in some cases, it is not fair to expect unrelated project developers to depend on one another for data generation. |
| Verra Response | Data service providers will conduct the outside the leakage belt analysis. |
| Aster Global Assessment | The assessment team confirms the revised module and methodology has DSPs conduct analyses outside the LB. |
| Status | drafted |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | N/A |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 376.1 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Wildlife Conservation Society (WCS) |
| Reviewer Country | Rwanda |
| Response(s) - including general questions & comments | LK-AUD Estimation of Rural-Urban fraction It is recommended that Verra publish additional guidance on what is an appropriate approach to develop estimates of rural to urban migration proportion. Development of this factor could also be undertaken by a 3rd party recruited by Verra. |
| Verra Response | The rural-urban fraction has been removed. |
| Aster Global Assessment | The assessment team confirms the rural-urban fraction is removed from the revised module and methodology. |
| Comment # | 376.11 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Wildlife Conservation Society (WCS) |
| Reviewer Country | Rwanda |
| Response(s) - including general questions & comments | Additional Recommendations – Verra JNR Programme - Scenario 1 Currently, Verra’s Jurisdictional Nested REDD+ Programme, three ‘scenarios’ are delineated. Under JNR Scenario 1, the Jurisdictional government of a given country can develop and register a FREL covering the jurisdictional territory. This FREL of course incorporates both the development of activity data and emission factors. It is recommended that the JNR Programme, specifically Scenario 1, be updated to allow for an alternative submission to the JNR Programme under Scenario 1 which would allow an option to submit a ‘Jurisdictional Activity Data Reference Level’ (e.g. only including Activity Data and not include emission factors) and allow the Jurisdiction to then employ the adaptation to the JNR Risk Tool and JNR Allocation Tool as |

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| | <p>described in the J-ADB-UD.</p> <p>The Jurisdiction, if desired, can employ the guidance in the J-ADB-UD Module to develop this Jurisdictional Activity Data Reference Level.</p> |
| Verra Response | JNR recommendations are not relevant to AUDef. |
| Aster Global Assessment | The assessment team concurs this comment is outside of the scope of proposed revisions for the JNR methodology. |
| Comment # | 377 |
| Question | General |
| Section | N/A |
| Reviewer Organization | TerraCarbon LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | See attached document. |
| Verra Response | <p>The historical reference period is set out in the standard; it is currently 10 years.</p> <p>Verra has taken on the commenters suggestion and is using third party data service providers to develop activity data. Per Appendix 1 A1.4.1, "Development of wall-to-wall forest, land cover or land cover change maps is not a requirement for estimating AD."</p> <p>VCS projects will be included in the jurisdiction during the HRP. In the jurisdictional allocation approach, projects no longer construct a "reference region" (Appendix 1 A1.2.1).</p> <p>The <i>UDef-RP</i> is currently being revised (with the commenter's significant involvement).</p> <p>AUDef covers only avoiding unplanned deforestation; in time, modules for avoiding planned deforestation and unplanned forest degradation will be added to M0184.</p> <p>We have followed the commenter's guidance re: the transition period; see the Verra website post Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits for information on projects' transition to the new methodology (https://verra.org/consolidated-redd-methodology-ensures-integrity-of-forest-conservation-credits/).</p> <p>The assumption of independent statistical errors of the C stock estimates is made for practical reasons, as it is often difficult to collect sufficient field data to obtain decent estimates of the various covariances involved. Even variables measured on the same sampling plots do not necessarily have the same sample size, as some measurements are more costly than others (e.g., aboveground biomass vs. litter). Moreover, for variables that are positively correlated, ignoring their correlation overestimates their joint variance, which yields a larger -and, therefore, more conservative- estimate of the uncertainty.</p> |
| Aster Global Assessment | The Assessment Team reviewed the public comment PDF and has broken down each individual comment below. |
| Round 1 Response | See response to sub-comments. |

| from Methodology Developer | | | | | | | |
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| Aster Global Findings Round 2 | All sub-comments have been addressed. | | | | | | |
| Comment # | 377.01 | | | | | | |
| Question | General | | | | | | |
| Section | N/A | | | | | | |
| Reviewer Organization | TerraCarbon LLC | | | | | | |
| Reviewer Country | USA | | | | | | |
| Response(s) - including general questions & comments | <p><u>Determination of jurisdictional activity data baseline for unplanned deforestation (J-ADB-UD)</u></p> <table border="1"> <thead> <tr> <th>Historic</th> <th>Reference</th> <th>Period</th> </tr> </thead> <tbody> <tr> <td colspan="3"> Although it may seem conservative to use a short historic reference period to derive activity data, research in land change modeling suggests that longer time intervals are needed to differentiate signal from noise. If a shorter historic period is desired to understand more recent trends in deforestation, it would be more advantageous to have additional time points to decipher these trends. If the concern is that the period of baseline validity is too long and trends may have changed, this can be resolved by shortening the validity period, without changing the historic reference period. </td> </tr> </tbody> </table> | Historic | Reference | Period | Although it may seem conservative to use a short historic reference period to derive activity data, research in land change modeling suggests that longer time intervals are needed to differentiate signal from noise. If a shorter historic period is desired to understand more recent trends in deforestation, it would be more advantageous to have additional time points to decipher these trends. If the concern is that the period of baseline validity is too long and trends may have changed, this can be resolved by shortening the validity period, without changing the historic reference period. | | |
| Historic | Reference | Period | | | | | |
| Although it may seem conservative to use a short historic reference period to derive activity data, research in land change modeling suggests that longer time intervals are needed to differentiate signal from noise. If a shorter historic period is desired to understand more recent trends in deforestation, it would be more advantageous to have additional time points to decipher these trends. If the concern is that the period of baseline validity is too long and trends may have changed, this can be resolved by shortening the validity period, without changing the historic reference period. | | | | | | | |
| Verra Response | The historical reference period is set out in the standard; it is currently 10 years. | | | | | | |
| Aster Global Assessment | The assessment team is not aware where in the VCS Standard, the historic reference period is set at 10 yr. The Verra comment has not addressed the commenter's concern that a shorter HRP may be problematic. | | | | | | |
| Aster Global Initial Findings | CL: Please address comment, in line with finding. | | | | | | |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: The definition of historical reference period (HRP) for Avoiding Unplanned Deforestation projects is set out in Section 3.4.15(2) of the VCS Methodology Requirements v4.3 (HRP is defined in the methodology by referring to the Methodology Requirements). It has not been changed in recent years and will not be affected by the introduction of this methodology since it is a VCS Program level (and out of the scope of this methodology consultation). | | | | | | |
| Aster Global Findings Round 2 | <p>The assessment team notes that the methodology developer has clarified that the requirements for the HRP come from the Methodology Requirements, not the standard. However, it is unclear how the revised response addresses the concern of a shorter HRP.</p> <p>The VCS Methodology Requirements state "Methodologies shall set out criteria and procedures to identify where deforestation would likely occur using spatial analysis and projections (except for certain mosaic configurations as set out in Section 3.4.17(2)(c)). Such analysis shall be based on historical factors over at least the previous 10 years that explain past patterns and can be used to make future projections of deforestation." While the methodology requirements allude to the length (10 years) and definition of the historical reference period, this is unclear as the term "Historical reference period" is not actually used. VM0007 v1.6 (referenced as a source for the methodology and module) defines a Historical Reference Period that could potentially not align with the "definition" in the</p> | | | | | | |

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| | VCS Methodology Requirements. It is unclear to the assessment team if the methodology intends to use a Historical Reference Period of 10 years. |
| Round 2 NCR/CL/OFI2 | <p>CL: Please provide additional clarification to address the commenter's concern.</p> <p>CL: Please clarify in line with the finding and specifically state the length of the historical reference period that is required by the VCS Program.</p> |
| Round 2 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The definition of historical reference period (HRP) for Avoiding Unplanned Deforestation projects is set out in the <i>VCS Methodology Requirements</i> (HRP is defined in the methodology by referring to the <i>Methodology Requirements</i>). Its ten-year duration was consulted on within the last three years and Verra determined not to change it - longer periods are useful for identifying trends, as the commenter points out, but since we use a historical average, shorter periods are preferred. Ten years was determined to be the sweet spot.</p> <p>The historical reference period will not be affected by the introduction of this methodology since it is a VCS Program-level requirement (and out of the scope of this methodology consultation).</p> <p>Response to Aster Round 2 CL: It should be enough to state that this is a VCS Program-level requirement unaffected by the introduction of this methodology, but the response has been updated to give additional rationale for the ten-year duration of the HRP.</p> <p>The response speaks to how HRP is defined in the methodology by referring to the methodology requirements.</p> <p>VM0007 is currently undergoing a correction and clarification with the same definition of historical reference period as used in M0184 ("A fixed period of time during which factors must be considered to make future projections of deforestation, as set out in the VCS Methodology Requirements").</p> |
| Aster Global Findings Round 3 | The assessment team notes that the definitions will be out of alignment until the referenced updates are made to VM0007. It is unclear if this is in line with the VCS Principle of Consistency. |
| Round 3 NCR/CL/OFI | CL: Please clarify in line with the identified finding. |
| Round 3 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: The definition of historical reference period (HRP) for Avoiding Unplanned Deforestation projects is set out in the <i>VCS Methodology Requirements</i> (HRP is defined in the methodology by referring to the <i>Methodology Requirements</i>). Its ten-year duration was consulted on within the last three years and Verra determined not to change it - longer periods are useful for identifying trends, as the commenter points out, but since we use a historical average, shorter periods are preferred. Ten years was determined to be the sweet spot.</p> <p>The historical reference period will not be affected by the introduction of this methodology since it is a VCS Program-level requirement (and out of the scope of this methodology consultation).</p> <p>Response to Aster Round 3 CL: We plan to release corrections and clarifications to VM0007 before the M0184 is released.</p> |
| Final Findings | The assessment team received confirmation from the VCS Methodologies Director that the referenced modules have been updated. The assessment team determined this is sufficient to close the identified finding. |
| Status | closed R4 |

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| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>The definition of historical reference period (HRP) for Avoiding Unplanned Deforestation projects is set out in the VCS Methodology Requirements (HRP is defined in the methodology by referring to the Methodology Requirements). Its ten-year duration was consulted on within the last three years and Verra determined not to change it - longer periods are useful for identifying trends, as the commenter points out, but since we use a historical average, shorter periods are preferred. Ten years was determined to be the sweet spot.</p> <p>The historical reference period will not be affected by the introduction of this methodology since it is a VCS Program-level requirement (and out of the scope of this methodology consultation).</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 377.02 |
| Question | General |
| Section | N/A |
| Reviewer Organization | TerraCarbon LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p><u>Determination of jurisdictional activity data baseline for unplanned deforestation (J-ADB-UD)</u> <u>Activity data development - Timeline for generation</u></p> <p>We are concerned that the effort and timeline for Verra to develop activity data, jurisdictional forest benchmark maps (that align with such activity data and incorporate project specific forest carbon benchmark maps), and risk maps to allocate project-level baselines will be significant. Having developed national scale forest benchmark maps, we suggest that this work and ensuring their alignment with activity data will be time consuming, especially in countries with lower density forest definitions (i.e., 10% canopy cover). We are concerned that requiring each of these steps to be developed by a third party contracted by Verra and to be validated will create severe delays in project development that will impact financing that is needed to protect areas under immediate threat.</p> <p>In advance of Verra-directed development of activity data, which will take time to operationalize, both from a technical and administrative standpoint, we suggest that Verra permit development of activity data by other entities. Such efforts could be designed to meet Verra's expectations for independence and objectivity by setting minimum requirements for Verra approval, e.g., requirements related to stakeholder consultation, no objection from relevant government authorities, demonstration of independence of technical service providers (e.g. not under direct contract with a project proponent), and of course all of the technical safeguards established in the methodology, independently validated by a third party VVB.</p> |
| Verra Response | Verra has taken on the commenters suggestion and is using third party data service providers to develop activity data. Per Appendix 1 A1.4.1, "Development of wall-to-wall forest, land cover or land cover change maps is not a requirement for estimating AD." |

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| Aster Global Assessment | Verra has clarified, on a technical level, how some of the concerns regarding the efficacy of 3rd party DSPs are alleviated. However, the spirit of the comment largely revolved around the ability for DSPs to produce deliverables; further, the comment suggested PPs can develop their own data conformant to Verra standard, which could then be assessed by VVBs. The assessment team acknowledges the module states that Verra will consider timeliness when selecting DSPs but more information would be clarifying. |
| Aster Global Initial Findings | CL: Please explain how PPs will proceed during potential delays associated with development of AD data, risk maps, etc. provided by DSPs. |
| Round 1 Response from Methodology Developer | <p>Updated Verra response to original comment: Verra has taken on the commenter's suggestion and is using third party data service providers to develop activity data. Per Appendix 1 A1.4.1, "Development of wall-to-wall forest, land cover or land cover change maps is not a requirement for estimating AD."</p> <p>In the approach put forward by this methodology, it is essential to have one set of data for the entire jurisdiction. Those data must meet Verra requirements to ensure the integrity of VCU's. We appreciate that there will be delays in data development and will work with project proponents on a case-by-case basis to make arrangements to extend baselines.</p> <p>Explanation of original response: Didn't fully address the question - added second paragraph</p> |
| Aster Global Findings Round 2 | The methodology developer reiterates the necessity to have one set of data for the entire jurisdiction, and acknowledges that there may be delays. The methodology developer has indicated that should delays occur, the methodology developer will work with project proponent's on a case by case basis. This item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Comment # | 377.03 |
| Question | General |
| Section | N/A |
| Reviewer Organization | TerraCarbon LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p><u>Determination of jurisdictional activity data baseline for unplanned deforestation (J-ADB-UD)</u> <u>Activity data development - Development of Activity Data</u></p> <p>Although sample-based data collection approaches have some advantages over algorithm-based wall-to-wall classification, visual image interpretation is often challenging. In many countries the line between forest and non-forest is difficult to parse out, so much so that even three interpreters may struggle to agree. Low density forest types are also difficult for computer algorithms to differentiate, but the benefit of wall-to-wall mapping is that consistent algorithms, not humans, are able to make these determinations. Replacement of wall-to-wall mapping with sampling does not necessarily increase the accuracy of activity data values, and should be an option not a requirement.</p> <p>Further, we question the ability of visual interpreters to distinguish between planned and unplanned deforestation. We have developed land cover change maps in many</p> |

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| | countries and think it is untenable to rely on visual cues to distinguish the legality or motivation of deforestation. National contexts vary greatly and without an intimate understanding of this, the patterns of deforestation alone are not likely to derive causation. |
| Verra Response | Verra has taken on the commenters suggestion and is using third party data service providers to develop activity data. Per Appendix 1 A1.4.1, "Development of wall-to-wall forest, land cover or land cover change maps is not a requirement for estimating AD." |
| Aster Global Assessment | The assessment team deems Verra's response to be incomplete. |
| Aster Global Initial Findings | CL: Please address original comment. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <p>1) The methodology chooses to follow the best practice as advocated by GFOI, FAO and others. Estimates of area change based on pixel counting without undergoing bias-correction are not credible and overwhelming result in non-conservative estimates of area of change. The shortcomings of estimating areas, particularly areas of change, by pixel counting on wall-to-wall maps constructed by classifying remote sensing data have been well identified in the scientific literature; such limitations include the frequent bias of the resulting estimates and the lack of an estimate of the uncertainty of the estimates. To address such shortcomings, the sample-based approach for estimating areas and areas of change from remote-sensing classifications has been advocated as a good-practice. Key references describing such shortcomings and supporting the use of the sample-based approach as a good practice include: 1) Pontus Olofsson, Giles M. Foody, Martin Herold, Stephen V. Stehman, Curtis E. Woodcock, Michael A. Wulder, Good practices for estimating area and assessing accuracy of land change, Remote Sensing of Environment, Volume 148, 2014, Pages 42-57, ISSN 0034-4257, https://doi.org/10.1016/j.rse.2014.02.015. and 2) Olofsson, P. (2018) Accuracy and Area Estimation. In S. Liang (Ed.), Comprehensive Remote Sensing, vol. 6, pp. 128–135. Oxford: Elsevier</p> <p>2) Human interpretation is required, regardless of whether a wall to wall approach or point sample is undertaken. The former requires human interpretation of plots to conduct accuracy assessment. The real world does not fit neatly into land cover categories we assign to them, and there is no approach that can produce unfailable classifications of every possible location in a jurisdiction. This amount of basic uncertainty cannot be completely overcome, but data service providers can implement rules to limit it as much as feasible.</p> <p>Explanation of original Verra Response: Original response has been expanded upon to address original concerns about appropriateness of point samples.</p> <p>Response to additional points raised by Aster: N/A</p> |
| Aster Global Findings Round 2 | The methodology developer has provided evidence supporting a sample based approach as opposed to the pixel counting approach noted in the comment. The methodology developer notes that human interpretation is required, acknowledging the uncertainty that is associated. It is acknowledged that DSPs can take steps to reduce this inherent uncertainty. The assessment team determined the revised response sufficiently addresses the comment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |

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| Revised Verra Response October 2023 | The historical reference period will not be affected by the introduction of this methodology since it is a VCS Program-level requirement (and out of the scope of this methodology consultation). |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 377.04 |
| Question | General |
| Section | N/A |
| Reviewer Organization | TerraCarbon LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p>Determination of jurisdictional activity data baseline for unplanned deforestation (J-ADB-UD) <u>Activity data development - Activity Data spatial scale / region</u></p> <p>Activity Data to derive baselines should not be sourced from areas where carbon projects are undertaken. Since activity data is used to estimate deforestation in a without project scenario, projects, and possibly areas with other effective conservation approaches should be excluded. If these areas are not excluded, then carbon finance could be quickly cut-off if a project intervention is successful even while the risk of deforestation without the project intervention remains high.</p> |
| Verra Response | VCS projects will be included in the jurisdiction during the HRP. In the jurisdictional allocation approach, projects no longer construct a "reference region" (Appendix 1 A1.2.1). |
| Aster Global Assessment | Many comments have questioned the inclusion of projects within the baseline. The assessment team asks for elaborated rationale to satisfy this, and other related, comments. |
| Aster Global Initial Findings | CL: Please address, in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: This decision is necessarily a balance, and results could end up as conservative or unconservative depending on specific context of each jurisdiction. There could be projects in the future that cover almost the entire forested extent in a jurisdiction and so removal of project areas would remove any potential activity data, or would require treatment of the area outside projects as a reference region that produces a deforestation rate as a %/y-1 that is scaled to the PA. It is rare that deforestation is 100% halted in any given area and so in contrast to the suggestion from the commenter, including project areas will be include areas of deforestation which will foster risk mapping and prolonged project potential. The options of producing AD only from non-project areas and then scaling it to PAs was also considered, but was not adopted at this time as it has the potential to be non-conservative.</p> <p>After prolonged consideration of the balance of costs and benefits it was determined project areas should not be excluded.</p> <p>Explanation of original Verra Response: Verra has provided additional justification for the original response</p> <p>Response to additional points raised by Aster: N?A</p> |

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| Aster Global Findings Round 2 | <p>Verra has considered the comment and addressed it in its response. The assessor believes inclusion of the projects in the AD is more conservative, and if carbon finance is successful, then successful projects should eventually become more common practice.</p> <p>Per the VCS Standard "Note – Accuracy should be pursued as far as possible, but the hypothetical nature of baselines, the high cost of monitoring of some types of GHG emissions reductions and carbon dioxide removals, and other limitations make accuracy difficult to attain in many cases. In these cases, conservativeness may serve as a moderator to accuracy in order to maintain the credibility of project and program GHG quantification." This item is addressed.</p> | | | | |
| Status | closed R2 | | | | |
| Response Updated Since Finding Closed? | no | | | | |
| Revised Verra Response October 2023 | <p>This decision is necessarily a balance, and results could end up as conservative or unconservative depending on specific context of each jurisdiction. There could be projects in the future that cover almost the entire forested extent in a jurisdiction and so removal of project areas would remove any potential activity data, or would require treatment of the area outside projects as a reference region that produces a deforestation rate as a %/y-1 that is scaled to the PA. It is rare that deforestation is 100% halted in any given area and so in contrast to the suggestion from the commenter, including project areas will be include areas of deforestation which will foster risk mapping and prolonged project potential.</p> <p>The option of producing AD only from non-project areas and then scaling it to PAs was also considered, but was not adopted at this time as it has the potential to be non-conservative. After prolonged consideration of the balance of costs and benefits it was determined project areas should not be excluded.</p> | | | | |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. | | | | |
| Comment # | 377.05 | | | | |
| Question | General | | | | |
| Section | N/A | | | | |
| Reviewer Organization | TerraCarbon LLC | | | | |
| Reviewer Country | USA | | | | |
| Response(s) - including general questions & comments | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 5px;"> Determination of jurisdictional activity data baseline for unplanned deforestation (J-ADB-UD) </td> <td style="width: 50%; padding: 5px;"> Planned </td> </tr> <tr> <td colspan="2" style="text-align: right; padding: 5px;"> Deforestation </td> </tr> </table> <p>The scope of the module is limited to unplanned deforestation only. We would suggest that Verra gives further consideration to expanding the module to also include planned deforestation. We are concerned that planned deforestation cannot be distinguished and excluded from the Activity Data, and are reminded that Verra allows jurisdictions to develop programs without distinguishing between planned and unplanned deforestation. Using more complex risk mapping variables (consider the inclusion of land tenure or other land planning variables) could support the separation of these two deforestation classes and allocate risk accordingly (simple distance to deforestation models will not), and provide a more consistent and complete framework for all REDD projects</p> | Determination of jurisdictional activity data baseline for unplanned deforestation (J-ADB-UD) | Planned | Deforestation | |
| Determination of jurisdictional activity data baseline for unplanned deforestation (J-ADB-UD) | Planned | | | | |
| Deforestation | | | | | |

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| Verra Response | <p>The <i>UDef-RP</i> is currently being revised (with the commenter's significant involvement).</p> <p>AUDef covers only avoiding unplanned deforestation; in time, modules for avoiding planned deforestation and unplanned forest degradation will be added to M0184.</p> |
| Aster Global Assessment | <p>While the assessment team acknowledges degradation will be handled in a forthcoming module under this methodology, the public comment did question whether it is advantageous to include degradation and deforestation in the same module, but whether separation of degradation and deforestation may create issues in the future.</p> |
| Aster Global Initial Findings | <p>CL: Please address, in line with finding.</p> |
| Round 1 Response from Methodology Developer | <p>It has been clarified in the methodology (Section 2) that while the methodology only includes an AUD module in its first iteration, other modules will be developed to cover other REDD activities, such as avoided planned deforestation (APD), and avoided unplanned degradation. Avoided planned degradation projects should look at IFM methodologies. Verra already started working on such development. In the meantime, projects will be able to continue using the non-AUD portions of existing VCS methodologies.</p> |
| Aster Global Findings Round 2 | <p>The original finding in Round 1 contained some confusion - conflating degradation with the commenter's actual concern of planned deforestation. However, the concern has still not been addressed.</p> <p>How will interim projects distinguish between AUDD and APDD?</p> |
| Round 2 NCR/CL/OFI2 | <p>CL: How will Verra/PP distinguish between unplanned versus planned deforestation when creating these maps/models for AD, and how will a jurisdiction's meshing of planned and unplanned deforestation be distinguished?</p> |
| Round 2 Response from Methodology Developer | <p>Revised Verra response to original comment:</p> <p>Thoroughly distinguishing between planned and unplanned deforestation events is challenging. To achieve such distinction, to the extent possible, in the process of constructing jurisdictional AD and forest cover maps, numerous recommendations and provisions have been included in the latest version of module MD00XX, particularly in Step 1 of Section A1.4 Compilation and Allocation of Unplanned Deforestation AD. It would lead to inaccurate accounting of both planned and unplanned deforestation to conflate to two forms of deforestation. Differentiation has moved from the legal basis for deforestation to magnitude of deforestation paired with the form and drivers of deforestation to allow such deforestation to be identified and excluded from AUD accounting.</p> |
| Aster Global Findings Round 3 | <p>The assessment team acknowledges that multiple efforts have been made to distinguish planned from unplanned deforestations. E.g. Table 11 in A1.4.1. contains rules for excluding large scale planned deforestation and Sops must be developed that detail the procedures for identifying and discriminating planned deforestation from unplanned deforestation.</p> <p>This is sufficient to consider this comment adequately addressed.</p> |
| Status | <p>closed R3</p> |
| Response Updated Since Finding Closed? | <p>wording/typo updates</p> |
| Revised Verra Response October 2023 | <p>Thoroughly distinguishing between planned and unplanned deforestation events is challenging. To achieve such distinction, to the extent possible, in the process of constructing jurisdictional AD and forest cover maps, numerous recommendations and provisions have been included in the latest version of module MD00XX, particularly in Step 1 of AUDef Section A1.4 Compilation and Allocation of Unplanned Deforestation AD (e.g., Table 11 in A1.4.1. contains rules for excluding large scale planned</p> |

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| | <p>deforestation and Sops must be developed that detail the procedures for identifying and discriminating planned deforestation from unplanned deforestation).</p> <p>It would lead to inaccurate accounting of both planned and unplanned deforestation to conflate to two forms of deforestation. Differentiation has moved from the legal basis for deforestation to magnitude of deforestation paired with the form and drivers of deforestation to allow such deforestation to be identified and excluded from AUD accounting.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 377.06 |
| Question | General |
| Section | N/A |
| Reviewer Organization | TerraCarbon LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p><u>Estimation of baseline greenhouse gas emission within the project area and leakage belt from unplanned deforestation (BL-UD) Uncertainty</u></p> <p>The illustrative uncertainty propagation equations in the BL-UD table assume independent errors. Some clarification should be given for errors that are not independent - in particular, we note that pools like aboveground biomass, dead wood and litter are often measured in the same inventory plots (and not independent), and in which case combined error for these pools is more appropriately calculated as error across the sample population of plot level global (aboveground biomass + dead wood + litter) estimates</p> |
| Verra Response | The assumption of independent statistical errors of the C stock estimates is made for practical reasons, as it is often difficult to collect sufficient field data to obtain decent estimates of the various covariances involved. Even variables measured on the same sampling plots do not necessarily have the same sample size, as some measurements are more costly than others (e.g., aboveground biomass vs. litter). Moreover, for variables that are positively correlated, ignoring their correlation overestimates their joint variance, which yields a larger -and, therefore, more conservative- estimate of the uncertainty. |
| Aster Global Assessment | Verra has stated there are two reasons to calculate error propagation among colinear variables: 1) it is conservative given that it will lead to an upwardly biased variance; 2) due to different sampling schema, it may not be possible to combine different carbon pools into the same sample observations. The assessment team concurs. |
| Comment # | 377.07 |
| Question | General |
| Section | N/A |
| Reviewer Organization | TerraCarbon LLC |
| Reviewer Country | USA |
| Response(s) - including general questions & comments | <p><u>Transition Process</u></p> <p>While not covered in any of the modules open for public comment, we would also like to comment on the methodology transition process for REDD projects. While we support the spirit of transparency and standardization underlying the proposed</p> |

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| | <p>changes, we are concerned that the recent clarification on the timeline for transitioning to new methodologies is too short in the context of Verra's proposed process for developing and allocating baseline data for REDD projects. Despite best efforts and intentions, this process will be new for all involved and likely to take time to get it right and to cover all countries where projects are being developed.</p> <p>In order to allow projects to move ahead during this time of transition, we encourage Verra to reframe the transition period for REDD projects. Instead of requiring that new projects use the new methodology within 6 months of approval, we suggest that projects have 6 months from completion and validation of activity data and forest benchmark maps needed by projects to apply the revised REDD methodologies.</p> |
| Verra Response | <p>We have followed the commenter's guidance re: the transition period; see the Verra website post Consolidated REDD Methodology Ensures Integrity of Forest Conservation Credits for information on projects' transition to the new methodology (https://verra.org/consolidated-redd-methodology-ensures-integrity-of-forest-conservation-credits/).</p> |
| Aster Global Assessment | <p>The assessment team finds this response to be thorough.</p> |
| Comment # | 378 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>See attached document.</p> |
| Verra Response | <p>The modules have been combined and streamlined. The language, while still complex, is simpler, with fewer acronyms.</p> <p>Most of the general comments on the Meth Application Guide are null since we've combined the modules. Verra will pay for the data service providers; this will be subsidized by a new project proponent fee. Verra's Conflict of Interest Policy requires contractors to disclose all relationships, positions, or circumstances that they believe could result in a conflict of interest or the appearance thereof. Appendix 3 now sets out what information must be submitted as part of the Jurisdictional AD Request Form. As long as AD is available to be allocated, requests will be fielded in the order they are received. See Section 8.1.1 on "Initial baseline validity period under this methodology" in VM0184 for information on start dates and adopting the jurisdictional baseline. Data service providers will develop risk maps. They will be assessed by independent experts.</p> <p>LK-UD-AS: Data service providers will conduct the outside the leakage belt analysis (Appendix 2), so this should not but burden on the project proponent or result in more than one map for a jurisdiction and it should be doable over an entire country. Adding differentiation by different commodities would add unnecessary complexity, but we will consider it in the future and would welcome the commenter to provide suitable language. We have not adopted the commenter's suggestion around eliminating the need for a project to take into account deforestation outside the leakage belt on the grounds that it would be difficult for a project proponent to demonstrate that deforestation beyond the leakage belt could not be attributed to their project area. Mining as a cause of leakage could be considered under the factors physical</p> |

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| | <p>accessibility and relative protection status in Appendix 2 A2.1. In A2.2, assuming long-term agriculture is more conservative (in general) than assuming mining as a default alternative land use. The description of the leakage belt (Section 5.2.2) has been revised. The suggestion about noting that emissions from fire were considered in the baseline scenario was adopted (Section 5.3.3.2). EFC_{i,t} has been replaced by E_{BSL,FC,i,t} in Section 5.3.3.3 equation (42). The phrase "Determine if AS analysis is needed" has been removed. The proportion of households to be sampled has been changed; hopefully the commenter agrees that it is less burdensome as revised (Section 5.3.3.4). PROUrban has been removed.</p> <p>J-ADB-UD: Appendix 4 now sets out clearly what supplemental materials stakeholders may provide to data service providers/Verra. The assessment of historical deforestation in Appendix 1 will include VCS projects since in this methodology there are no longer reference regions. Unplanned forest degradation will be taken into account in a supplementary module under VM0184 or - for planned degradation - through complementary IFM methodologies. Requirements for data service providers are set out in the rolling expression of interest (https://verra.org/wp-content/uploads/EOI-Allocation-Data-service-providers.pdf) and periodic requests for proposals (e.g., https://verra.org/wp-content/uploads/2023/04/RFP-Dvpt-of-Jurisdictional-AD-and-FCBMs-for-VCS-AUDef-Projects-17-Apr-2023.pdf). The definition of forest has been revised and moved to VM0184. The definition of deforestation has been removed completely. The applicability condition referring to JNR has been removed and reference added to say that whatever information the AUDef sets out that the project should get from Verra it should get from the jurisdictional proponent in a JNR jurisdiction. Trends may be added in the future, but for simplicity have not been added to the initial version of this module. It's not the place of the methodology to set out why they are excluded at present. Verra decides the jurisdictional boundary and has done so at the highest reasonable level. Table 11 in Appendix 1 Section A1.4.1 Step 1 now sets out the identified exclusions as optional or mandatory. LiDAR is no longer mentioned in the module. The "coordinated sampling effort" refers to stakeholders (likely project proponents) working together with data service providers (Appendix 1 A 1.4.3). Verra will play no role in coordinating this. Appendix 1 A1.1 sets out the data that will be provided by Verra to the project proponent.</p> <p>MON-AUD: Acronym confusion should be cleared up by the module consolidation. Confusion around discount factors has also now been resolved. The 1/20 decay rate for wood products and soils is justified in Section 3.6.4 of the <i>VCS Methodology Requirements</i>.</p> |
| Aster Global Assessment | The Assessment Team reviewed the public comment PDF and has broken down each individual comment below. |
| Aster Global Findings Round 2 | All sub-comments have been addressed. |
| Comment # | 378.01 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general | General comments • We encourage Verra to ensure that both the methodology application guide and the different modules are user friendly and understandable to all. These modules will be used by a cross-section of people from both technical and less technical backgrounds, |

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| questions & comments | with many not being native English speakers. We believe that as currently written, the modules create a barrier, and are concerned that the barrier might be in particular for those who aren't yet familiar with carbon project development, but would like to explore the potential of their carbon projects, around the world. |
| Verra Response | Most of the general comments on the Meth Application Guide are null since we've combined the modules. Verra will pay for the data service providers; this will be subsidized by a new project proponent fee. Verra's Conflict of Interest Policy requires contractors to disclose all relationships, positions, or circumstances that they believe could result in a conflict of interest or the appearance thereof. Appendix 3 now sets out what information must be submitted as part of the Jurisdictional AD Request Form. As long as AD is available to be allocated, requests will be fielded in the order they are received. See Section 8.1.1 on "Initial baseline validity period under this methodology" in VM0184 for information on start dates and adopting the jurisdictional baseline. Data service providers will develop risk maps. They will be assessed by independent experts. |
| Aster Global Assessment | The response did not take into account the general comment on clarity of the structure of the methodology; the original comment stated this methodology and its associated modules may be too complex and create a barrier for implementation, especially among non-English speakers. |
| Aster Global Initial Findings | CL: Please address comments related to clarity and complexity of the methodology structure. |
| Round 1 Response from Methodology Developer | Since the commented version, the structure of the methodology has been simplified to avoid unnecessary complexity while maintaining integrity and transparency. All modules have been combined within a single AUD module that only contains the processes and requirements for the projects. Requirements and rules applicable to jurisdictional activity data production are combined within the appendixes. An additional appendix has been added to clarify the AD Baseline allocation process and how it impacts the usual project VCS registration and verification process. |
| Aster Global Findings Round 2 | The assessment team concurs that consolidating the modules listed for public comment into a single module has been effective in improving the clarity of the methodology/module. Further the assessment team believes the clarity methodology/module has improved throughout the methodology development process. This item is addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Since the commented version, the structure of the methodology has been simplified to avoid unnecessary complexity while maintaining integrity and transparency. All modules have been combined within a single AUD module that only contains the processes and requirements for the projects. Requirements and rules applicable to jurisdictional activity data production are combined within the appendixes. An additional appendix has been added to clarify the AD Baseline allocation process and how it impacts the usual project VCS registration and verification process. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.02 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |

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| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>General comments</p> <ul style="list-style-type: none"> • We currently find the documents to be inaccessible for a few reasons: <ul style="list-style-type: none"> o The writing in the documents is overly complex. Sentences are long, with several sub sentences, making it hard in particular for non-native English speakers to understand them. We encourage Verra to edit these documents into a language that is understandable for non-native speakers, and those without deep technical knowledge. o While the documents relate to each other and are referenced, there are no hyperlinks to jump between the documents. Including hyperlinks would take one hurdle away from quickly accessing what's required. o While we understand the utility of acronyms, in this case, they make the documents hard to read because there are so many of them. Also, as they are unfamiliar, the reader can easily forget what an acronym stands for, and get lost in a sentence. We encourage Verra not to use acronyms. o We have pointed out a few instances in which the language in the document is confusing or potentially wrong, and encourage Verra to correct these. |
| Verra Response | <p>Most of the general comments on the Meth Application Guide are null since we've combined the modules. Verra will pay for the data service providers; this will be subsidized by a new project proponent fee. Verra's Conflict of Interest Policy requires contractors to disclose all relationships, positions, or circumstances that they believe could result in a conflict of interest or the appearance thereof. Appendix 3 now sets out what information must be submitted as part of the Jurisdictional AD Request Form. As long as AD is available to be allocated, requests will be fielded in the order they are received. See Section 8.1.1 on "Initial baseline validity period under this methodology" in VM0184 for information on start dates and adopting the jurisdictional baseline. Data service providers will develop risk maps. They will be assessed by independent experts.</p> |
| Aster Global Assessment | <p>The response did not take into account the general comment on clarity of writing. Assessment team finds the condensing of modules eliminates need for hyperlinking. The assessment team has issued similar findings related to acronyms, especially given that some of these acronyms are sourced from methodologies which will be replaced by this methodology.</p> |
| Aster Global Initial Findings | <p>CL: Please address comments related to writing clarity and acronyms.</p> |
| Round 1 Response from Methodology Developer | <p>Several efforts have been made to improve and simplify the methodology, including improving the language clarity. An editor has reviewed the methodology to improve the language and ensure consistency throughout the documents. As part of the 1st round of findings, Verra has also addressed the findings related to acronyms.</p> |
| Aster Global Findings Round 2 | <p>The assessment team concurs that the methodology/module have been simplified. Steps have been taken to address the findings related to acronyms, and the assessment team will ensure consistent/clear use of acronyms is used in the final version of the methodology/module.</p> |
| Status | <p>closed R1</p> |
| Response Updated Since Finding Closed? | <p>wording/typo updates</p> |
| Revised Verra Response October 2023 | <p>Several efforts have been made to improve and simplify the methodology, including improving the language clarity. An editor has reviewed the methodology to improve the language and ensure consistency throughout the documents. As part of the 1st round of findings, Verra has also addressed the findings related to acronyms.</p> |

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| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.03 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | General comments <ul style="list-style-type: none"> We also encourage Verra to specify who would pay for the third-party services, and, if it is project developers, how those that don't have access to capital can be supported, to level the playing field. |
| Verra Response | Most of the general comments on the Meth Application Guide are null since we've combined the modules. Verra will pay for the data service providers; this will be subsidized by a new project proponent fee. Verra's Conflict of Interest Policy requires contractors to disclose all relationships, positions, or circumstances that they believe could result in a conflict of interest or the appearance thereof. Appendix 3 now sets out what information must be submitted as part of the Jurisdictional AD Request Form. As long as AD is available to be allocated, requests will be fielded in the order they are received. See Section 8.1.1 on "Initial baseline validity period under this methodology" in VM0184 for information on start dates and adopting the jurisdictional baseline. Data service providers will develop risk maps. They will be assessed by independent experts. |
| Aster Global Assessment | The Module states a fee will be required for the AD Request form. The response from Verra has not states if there will be different rates or if other mechanism will be in place to "level the playing field". |
| Aster Global Initial Findings | CL: Please address the concern regarding fee structures. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects. This will be published (in summary or in full) at the time the methodology is released.</p> <p>Explanation of original Verra response: Added standardized response regarding cost-sharing.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |

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| Revised Verra Response October 2023 | Fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects. This will be published (in summary or in full) at the time the methodology is released. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.04 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Avoiding unplanned deforestation (AUD) methodology application guide General Comments <ul style="list-style-type: none"> • Will this document be published as a methodological tool or a new VCS program document? The first section makes it seem as though it will be a methodological tool, but the remainder of the document is structured more as a procedural programmatic tool. Could you clarify this? |
| Verra Response | Most of the general comments on the Meth Application Guide are null since we've combined the modules. Verra will pay for the data service providers; this will be subsidized by a new project proponent fee. Verra's Conflict of Interest Policy requires contractors to disclose all relationships, positions, or circumstances that they believe could result in a conflict of interest or the appearance thereof. Appendix 3 now sets out what information must be submitted as part of the Jurisdictional AD Request Form. As long as AD is available to be allocated, requests will be fielded in the order they are received. See Section 8.1.1 on "Initial baseline validity period under this methodology" in VM0184 for information on start dates and adopting the jurisdictional baseline. Data service providers will develop risk maps. They will be assessed by independent experts. |
| Aster Global Assessment | Verra has stated this comment is now null. The assessment team concurs. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Most of the general comments on the Meth Application Guide are null since we've combined the modules. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.05 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |

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| Response(s) - including general questions & comments | <p>Avoiding unplanned deforestation (AUD) methodology application guide General Comments</p> <ul style="list-style-type: none"> As part of the process of finalizing any new requirements, Verra should consider developing sample versions of the various reports and data that will be developed. It is very difficult to envision how all these pieces will come together without a concrete and substantive example of what is expected. |
| Verra Response | <p>Most of the general comments on the Meth Application Guide are null since we've combined the modules. Verra will pay for the data service providers; this will be subsidized by a new project proponent fee. Verra's Conflict of Interest Policy requires contractors to disclose all relationships, positions, or circumstances that they believe could result in a conflict of interest or the appearance thereof. Appendix 3 now sets out what information must be submitted as part of the Jurisdictional AD Request Form. As long as AD is available to be allocated, requests will be fielded in the order they are received. See Section 8.1.1 on "Initial baseline validity period under this methodology" in VM0184 for information on start dates and adopting the jurisdictional baseline. Data service providers will develop risk maps. They will be assessed by independent experts.</p> |
| Aster Global Assessment | <p>The commenter asks for an illustrative demonstration of the methodology being employed. The response from Verra did not directly address this.</p> |
| Aster Global Initial Findings | <p>CL: Please address the comment</p> |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: It is not a requirement under the VCS that methodologies must come with illustrative demonstration. The first validated projects will serve as an illustration; we will keep in mind that some kind of guidance would be helpful to project proponents.</p> <p>Explanation of original Verra response: The original response tried to respond to a multi-part comment in one response and missed this part.</p> |
| Aster Global Findings Round 2 | <p>The methodology developer notes that VCS methodologies are not required to come with an illustrative demonstration, and they will keep in mind some guidance would be helpful to project proponents. While the assessment team concurs that provision of an illustrative demonstration is not required, the assessment team believes the methodology developer making available some sort of guidance would be beneficial to project proponents.</p> |
| Round 2 NCR/CL/OFI2 | <p>OFI: While the methodology developer has indicated that they will keep in mind the provision of guidance to project proponents, the assessment team is issuing an OFI emphasizing the benefits of providing such guidance.</p> |
| Round 2 Response from Methodology Developer | <p>Revised Verra response to original comment: We intend to have these documents available either with the publication of the methodology or shortly thereafter. The first validated projects will also serve as an illustration. We will keep in mind that some kind of guidance would be helpful to project proponents.</p> <p>Response to Aster Round 2 OFI: Added the bit about having the documents available either with the publication of the methodology or shortly thereafter.</p> |
| Aster Global Findings Round 3 | <p>The methodology developer has opted to respond to the OFI. As no response was required, this item is closed.</p> |
| Status | <p>closed R3</p> |
| Response Updated | <p>significant change</p> |

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| Since Finding Closed? | |
| Revised Verra Response October 2023 | We intend to have templates available for these documents available within months of the methodology's publication either with the publication of the methodology or shortly thereafter. The first validated projects will also serve as an illustration. We will keep in mind that some kind of guidance would be helpful to project proponents. |
| Aster Global Assessment of Revised Response | The assessment team notes that significant changes were made in the revised response. However, these changes do not affect the assessment team's initial review and thus no further review is warranted. |
| Comment # | 378.06 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Avoiding unplanned deforestation (AUD) methodology application guide General Comments <ul style="list-style-type: none"> • Could you add hyperlinks to the other modules, when referring to them, for ease of use? |
| Verra Response | Most of the general comments on the Meth Application Guide are null since we've combined the modules. Verra will pay for the data service providers; this will be subsidized by a new project proponent fee. Verra's Conflict of Interest Policy requires contractors to disclose all relationships, positions, or circumstances that they believe could result in a conflict of interest or the appearance thereof. Appendix 3 now sets out what information must be submitted as part of the Jurisdictional AD Request Form. As long as AD is available to be allocated, requests will be fielded in the order they are received. See Section 8.1.1 on "Initial baseline validity period under this methodology" in VM0184 for information on start dates and adopting the jurisdictional baseline. Data service providers will develop risk maps. They will be assessed by independent experts. |
| Aster Global Assessment | Assessment team finds the condensing of modules eliminates need for hyperlinking. |
| Response Updated Since Finding Closed? | no R1 Verra response |
| Revised Verra Response October 2023 | All sources are hyperlinked in the current version of the methodology and module. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.07 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |

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| Response(s) - including general questions & comments | Avoiding unplanned deforestation (AUD) methodology application guide Detailed comments • Page 5 - Summary Description: We feel that the summary description lacks detail. It doesn't include a clear purpose of the document, nor its intended use. We would encourage Verra to provide more context and background here, to ensure that readers/users have a clear understanding of the context under which the document must be followed. • Page 5 - Definitions: We encourage Verra to include the most relevant definitions here, for ease of use/reference and to make the document more user-friendly. |
| Verra Response | Most of the general comments on the Meth Application Guide are null since we've combined the modules. Verra will pay for the data service providers; this will be subsidized by a new project proponent fee. Verra's Conflict of Interest Policy requires contractors to disclose all relationships, positions, or circumstances that they believe could result in a conflict of interest or the appearance thereof. Appendix 3 now sets out what information must be submitted as part of the Jurisdictional AD Request Form. As long as AD is available to be allocated, requests will be fielded in the order they are received. See Section 8.1.1 on "Initial baseline validity period under this methodology" in VM0184 for information on start dates and adopting the jurisdictional baseline. Data service providers will develop risk maps. They will be assessed by independent experts. |
| Aster Global Assessment | The Verra response does not address the comment regarding lack of detail or lack of definitions. |
| Aster Global Initial Findings | CL: Please address the comment |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: Most of the general comments on the Meth Application Guide are null since we've combined the modules. Verra will pay for the data service providers; this will be subsidized by a new project proponent fee. Verra's Conflict of Interest Policy requires contractors to disclose all relationships, positions, or circumstances that they believe could result in a conflict of interest or the appearance thereof. Appendix 3 now sets out what information must be submitted as part of the Jurisdictional AD Request Form. As long as AD is available to be allocated, requests will be fielded in the order they are received. See Section 8.1.1 on "Initial baseline validity period under this methodology" in VM0184 for information on start dates and adopting the jurisdictional baseline. Data service providers will develop risk maps. They will be assessed by independent experts. The new version of the methodology is much more standardized. More clarity and details have been provided on the utilisation of the methodology, as well as definitions when needed (i.e., when the definitions are not already in the VCS Program Definitions document). Explanation of original Verra response: left out response to detail and definitions; this has been added |
| Aster Global Findings Round 2 | The assessment team concurs that the methodology has been revised for clarity and additional detail compared to the modules that were available for public comment. Further, additional definitions have been included as part of the methodology review process. This item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |

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| Revised Verra Response October 2023 | <p>Most of the general comments on the Meth Application Guide are null since we've combined the modules.</p> <p>Verra will pay for the data service providers; this will be subsidized by a new project proponent fee. Verra's Conflict of Interest Policy requires contractors to disclose all relationships, positions, or circumstances that they believe could result in a conflict of interest or the appearance thereof.</p> <p>AUDef Appendix 3 now sets out what information must be submitted as part of the Jurisdictional AD Request Form. As long as AD is available to be allocated, requests will be fielded in the order they are received.</p> <p>See comment #168 for information on start dates and adopting the jurisdictional baseline.</p> <p>Data service providers will develop risk maps. They will be assessed by independent experts.</p> <p>The new version of the methodology is much more standardized. More clarity and details have been provided on the utilisation of the methodology, as well as definitions when needed (i.e., when the definitions are not already in the VCS Program Definitions document).</p> |
| Aster Global Assessment of Revised Response | <p>The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required.</p> |
| Comment # | 378.08 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Avoiding unplanned deforestation (AUD) methodology application guide Detailed comments</p> <ul style="list-style-type: none"> • Page 6 - Procedures: <ul style="list-style-type: none"> o Do project proponents have a right to appeal to the allocated activity data and risk map? If not, why not? o Who pays for the third-party service providers? o Is there a Conflict of Interest Policy that has to be adhered to by third party service providers (and others)? If so, could you include a link to it? If not, we strongly encourage Verra to create this. |
| Verra Response | <p>Most of the general comments on the Meth Application Guide are null since we've combined the modules. Verra will pay for the data service providers; this will be subsidized by a new project proponent fee. Verra's Conflict of Interest Policy requires contractors to disclose all relationships, positions, or circumstances that they believe could result in a conflict of interest or the appearance thereof.</p> |
| Aster Global Assessment | <p>The Verra response does not address the right to appeal.</p> |
| Aster Global Initial Findings | <p>CL: Please address the comment</p> |
| Round 1 Response from | <p>Revised Verra comment addressing original public comment: Most of the general comments on the Meth Application Guide are null since we've combined the modules.</p> |

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| Methodology Developer | <p>- Projects won't have a right to appeal when baseline AD are allocated to the project. However, a projects are invited to share with the DSP all information they think are of interest and must be considered when producing the jurisdictional data.</p> <p>- Verra will pay for the data service providers; this will be subsidized by a new project proponent fee.</p> <p>- Verra's Conflict of Interest Policy requires contractors to disclose all relationships, positions, or circumstances that they believe could result in a conflict of interest or the appearance thereof.</p> <p>Explanation of original Verra response: Left out response to right to appeal section; this has been added</p> |
| Aster Global Findings Round 2 | <p>The methodology developer has indicated that projects will not have a right to appeal allocated baseline AD. However, the commenter requested a justification as to "why or why not," which has not been addressed by the methodology developer.</p> <p>It is unclear if Verra plans to publish its COI policy for DSPs for transparency.</p> |
| Round 2 NCR/CL/OFI2 | <p>OFI: Please provide the requested justification.</p> <p>CL: Please clarify if/where the COI policy will be published publicly.</p> |
| Round 2 Response from Methodology Developer | <p>Updated Verra response to original comment:</p> <p>1) Projects will not have a chance to appeal because the integrity of the accounting at a jurisdictional level depends on consistent treatment of all areas. Appeals would lead to exceptions that undermine this overall integrity.</p> <p>2) The COI policy is already available online at https://verra.org/methodologies/redd-methodology/ - See the Note under the activity data availability table.</p> |
| Aster Global Findings Round 3 | <p>The methodology has opted to respond to the OFI and provide the requested justification. As no response was required, this item is closed.</p> <p>The assessment team confirmed that the COI policy is publicly available, thus addressing the finding.</p> |
| Status | closed R3 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>1) Projects will not have a chance to appeal because the integrity of the accounting at a jurisdictional level depends on consistent treatment of all areas. Appeals would lead to exceptions that undermine this overall integrity.</p> <p>2) The COI policy is already available online at https://verra.org/methodologies/redd-methodology/ - See the Note under the activity data availability table.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.09 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including | Avoiding unplanned deforestation (AUD) methodology application guide Detailed comments |

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| general questions & comments | <ul style="list-style-type: none"> • Page 7 - Submission of Jurisdictional Activity Data Baseline Allocation Request: <ul style="list-style-type: none"> o We did not see this template available as part of the consultation. It would be useful to have a sample template available to better understand the information that must be provided as part of this process. o Verra should consider what process it will follow in cases where multiple submissions are received for the same jurisdiction within a short time frame. We believe that there might be an incentive for project developers to be first in line for their submissions to be reviewed - what is the process of selecting submissions? |
| Verra Response | Appendix 3 now sets out what information must be submitted as part of the Jurisdictional AD Request Form. As long as AD is available to be allocated, requests will be fielded in the order they are received. See Section 8.1.1 on "Initial baseline validity period under this methodology" in VM0184 for information on start dates and adopting the jurisdictional baseline. Data service providers will develop risk maps. They will be assessed by independent experts. |
| Aster Global Assessment | Verra response does not address a template of the AD Allocation Report. |
| Aster Global Initial Findings | CL: Please address the comment |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing the original public comment:</p> <ul style="list-style-type: none"> - Verra is currently working on the template. It will be made available when the methodology is released. Appendix 3 now sets out what information must be submitted as part of the Jurisdictional AD Request Form. - As long as AD is available to be allocated, requests will be fielded in the order they are received. See Section 8.1.1 on "Initial baseline validity period under this methodology" in VM0184 for information on start dates and adopting the jurisdictional baseline. Data service providers will develop risk maps. They will be assessed by independent experts. <p>Explanation of original Verra response: Templates are out of the scope of this methodology consultation, so we pointed to where the information could be found in the appendix</p> |
| Aster Global Findings Round 2 | The methodology developer has indicated that the template will be released with the methodology, but has included what information must be submitted as part of the Jurisdictional AD form. The assessment team determined this is sufficient to close the identified finding. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <ul style="list-style-type: none"> - We intend to have templates available for these documents available within months of the methodology's publication. Appendix 3 now sets out what information must be submitted as part of the Jurisdictional AD Request Form. - As long as AD is available to be allocated, requests will be fielded in the order they are received. See comment #168 for information on start dates and adopting the jurisdictional baseline. Data service providers will develop risk maps. They will be assessed by independent experts. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.1 |
| Question | General |
| Section | N/A |

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| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Avoiding unplanned deforestation (AUD) methodology application guide Detailed comments</p> <ul style="list-style-type: none"> • Page 8 - Production of Jurisdictional Activity Data Baseline: What would happen if there are a number of projects in the same country, in the same jurisdiction, but with different start dates? Would that mean that Verra produces X individual activity data sets, one per project? |
| Verra Response | Appendix 3 now sets out what information must be submitted as part of the Jurisdictional AD Request Form. As long as AD is available to be allocated, requests will be fielded in the order they are received. See Section 8.1.1 on "Initial baseline validity period under this methodology" in VM0184 for information on start dates and adopting the jurisdictional baseline. Data service providers will develop risk maps. They will be assessed by independent experts. |
| Aster Global Assessment | Verra has responded that one Report will be delivered to each project. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | See comment #168 for information on start dates and adopting the jurisdictional baseline. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.11 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Avoiding unplanned deforestation (AUD) methodology application guide Detailed comments</p> <ul style="list-style-type: none"> • Page 8 - Development of the Jurisdictional Risk Map: <ul style="list-style-type: none"> o Could you confirm whether Verra produces the jurisdictional risk maps, or a service provider? If this is Verra, does Verra have the capability and capacity to do this on a large scale? o We couldn't find any information on the process and criteria that VVBs will use to validate the AD and risk map. We believe that it is important for stakeholders to be aware of these elements in order to provide comment on that key part of the process. |
| Verra Response | Data service providers will develop risk maps. They will be assessed by independent experts. |
| Aster Global Assessment | Verra confirmed DSPs will deliver risk maps; however, as noted by other findings, the language in the module is confusing, perhaps because it is DSPs that produce deliverables but that they deliver this to Verra and Verra delivers allocation reports to PPs. |

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| Aster Global Initial Findings | OFI: Ensure clarity in the roles and responsibilities of all actors. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing the original public comment: DSPs are producing jurisdictional data on behalf of Verra (i.e., DSPs are contracted by Verra to produce the data). Once the data are made available and assessed by independent experts, Verra will allocate them.</p> <p>Explanation of original Verra response: The assessment team's finding that the original Verra response confirmed DSPs would deliver risk maps indicated that we needed to more clearly state that the DSPs work at Verra's behest and Verra will be the entity to deliver the data.</p> |
| Aster Global Findings Round 2 | The methodology developer has opted to respond to the OFI, providing additional clarification on the roles and responsibilities as requested. As no response was required, this item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | DSPs are producing jurisdictional data on behalf of Verra (i.e., DSPs are contracted by Verra to produce the data). Once the data are made available and assessed by independent experts, Verra will allocate them. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.12 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS) General comments</p> <p>We believe that the calculation of leakage has been made more complex - from an already complex starting point. This is mainly due to the inclusion of a new approach that quantifies leaked emissions from geographically unconstrained (GU) deforestation agents. While, in principle, this is an addition that will enhance the environmental robustness of overall project GHG calculation, we believe the following aspects are important to consider:</p> <ul style="list-style-type: none"> • The calculation of base maps to quantify GU leakage is demanding and puts carbon developers in the situation to incur costs that will generate products that other projects will be able to use since the datasets will be public. We would recommend that Verra considers who covers this cost, and (if it is the project developer) whether they should be receiving funds from others who would like to access their datasets. |
| Verra Response | LK-UD-AS: Data service providers will conduct the outside the leakage belt analysis (Appendix 2), so this should not but burden on the project proponent or result in more than one map for a jurisdiction and it should be doable over an entire country. Adding differentiation by different commodities would add unnecessary complexity, but we will consider it in the future and would welcome the commenter to provide suitable language. We have not adopted the commenter's suggestion around eliminating the need for a project to take into account deforestation outside the leakage belt on the |

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| | <p>grounds that it would be difficult for a project proponent to demonstrate that deforestation beyond the leakage belt could not be attributed to their project area. Mining as a cause of leakage could be considered under the factors physical accessibility and relative protection status in Appendix 2 A2.1. In A2.2, assuming long-term agriculture is more conservative (in general) than assuming mining as a default alternative land use. The description of the leakage belt (Section 5.2.2) has been revised. The suggestion about noting that emissions from fire were considered in the baseline scenario was adopted (Section 5.3.3.2). EFC,i,t has been replaced by E,BSL,FC,i,t in Section 5.3.3.3 equation (42). The phrase "Determine if AS analysis is needed" has been removed. The proportion of households to be sampled has been changed; hopefully the commenter agrees that it is less burdensome as revised (Section 5.3.3.4). PROUrban has been removed.</p> |
| Aster Global Assessment | Verra's response has adequately addressed the concern raised by commenter regarding costs incurred by PPs |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Data service providers will conduct the outside the leakage belt analysis (AUDef Appendix 2), so this should not but burden on the project proponent or result in more than one map for a jurisdiction and it should be doable over an entire country. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.13 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS) General comments</p> <ul style="list-style-type: none"> • For countries without extensive environmental monitoring, the proposed approach can create a source of fragmentation of the information since two different projects can calculate GU-required maps differently. Could you elaborate on how you would reconcile this? |
| Verra Response | <p>LK-UD-AS: Data service providers will conduct the outside the leakage belt analysis (Appendix 2), so this should not but burden on the project proponent or result in more than one map for a jurisdiction and it should be doable over an entire country. Adding differentiation by different commodities would add unnecessary complexity, but we will consider it in the future and would welcome the commenter to provide suitable language. We have not adopted the commenter's suggestion around eliminating the need for a project to take into account deforestation outside the leakage belt on the grounds that it would be difficult for a project proponent to demonstrate that deforestation beyond the leakage belt could not be attributed to their project area. Mining as a cause of leakage could be considered under the factors physical accessibility and relative protection status in Appendix 2 A2.1. In A2.2, assuming long-term agriculture is more conservative (in general) than assuming mining as a default alternative land use. The description of the leakage belt (Section 5.2.2) has been revised. The suggestion about noting that emissions from fire were considered in the baseline scenario was adopted (Section 5.3.3.2). EFC,i,t has been replaced by</p> |

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| | E,BSL,FC,i,t in Section 5.3.3.3 equation (42). The phrase "Determine if AS analysis is needed" has been removed. The proportion of households to be sampled has been changed; hopefully the commenter agrees that it is less burdensome as revised (Section 5.3.3.4). PROPurban has been removed. |
| Aster Global Assessment | Verra's response has not directly addressed this comment regarding geographically unconstrained agents of deforestation. |
| Aster Global Initial Findings | CL: Please address comment. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing the original public comment: The risk of fragmentation has been addressed in the new version of the methodology. The approach to account for geographically unconstrained has been simplified. All projects in the same jurisdiction will be provided the same information by Verra (information that will be produced by the DSP, as per Appendix 2). The projects must complete information with local measurements of the proportion of inhabitants who immigrate in the last 5 years. |
| Aster Global Findings Round 2 | The revised Verra response includes clarification that the approach for accounting for geographically unconstrained has been simplified and that project proponents must use DSP provided information to determine PROPIMM. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The risk of fragmentation has been addressed in the new version of the methodology. The approach to account for geographically unconstrained has been simplified. All projects in the same jurisdiction will be provided the same information by Verra (information that will be produced by the DSP, as per ADef Appendix 2). The projects must complete information with local measurements of the proportion of inhabitants who immigrate in the last five 5 years. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.14 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS) General comments • It is unclear how the proposed approach is applicable in highly biodiverse countries. National minimum thresholds for feasible agricultural practices may be useless when biome conditions vary significantly. Could you provide more guidance on this? |
| Verra Response | LK-UD-AS: Data service providers will conduct the outside the leakage belt analysis (Appendix 2), so this should not but burden on the project proponent or result in more than one map for a jurisdiction and it should be doable over an entire country. Adding differentiation by different commodities would add unnecessary complexity, but we will consider it in the future and would welcome the commenter to provide suitable language. We have not adopted the commenter's suggestion around eliminating the need for a project to take into account deforestation outside the leakage belt on the grounds that it would be difficult for a project proponent to demonstrate that deforestation beyond the leakage belt could not be attributed to their project area. |

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| | <p>Mining as a cause of leakage could be considered under the factors physical accessibility and relative protection status in Appendix 2 A2.1. In A2.2, assuming long-term agriculture is more conservative (in general) than assuming mining as a default alternative land use. The description of the leakage belt (Section 5.2.2) has been revised. The suggestion about noting that emissions from fire were considered in the baseline scenario was adopted (Section 5.3.3.2). EFC,i,t has been replaced by E,BSL,FC,i,t in Section 5.3.3.3 equation (42). The phrase "Determine if AS analysis is needed" has been removed. The proportion of households to be sampled has been changed; hopefully the commenter agrees that it is less burdensome as revised (Section 5.3.3.4). PROUrban has been removed.</p> |
| Aster Global Assessment | Verra's response has not directly addressed this comment |
| Aster Global Initial Findings | CL: Please address comment. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing the original public comment: The approach to account for geographically unconstrained has been simplified. All projects in the same jurisdiction will be provided the same information by Verra (information that will be produced by the DSP, as per Appendix 2). When producing the information, the DSP will take into consideration all biomes. |
| Aster Global Findings Round 2 | The revised Verra response includes clarification that the approach for accounting for geographically unconstrained has been simplified. As DSPs will take in to consideration all biomes in data generation, the assessment team has determined this item is addressed |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The approach to account for geographically unconstrained has been simplified. All projects in the same jurisdiction will be provided the same information by Verra (information that will be produced by the DSP, as per ADef Appendix 2). When producing the information, the DSP will take into consideration all biomes. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.15 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS)</p> <p>General comments</p> <ul style="list-style-type: none"> The variables used to model GU potential available land are: Arable land; accessibility; and protection status. Unless the deforestation impact beyond the leakage belt (LB) from GU agents is capped, one can always find enough arable, unprotected, accessible land within a country that has suffered from deforestation. We would suggest that Verra changes this such that if a proponent shows that deforestation in areas beyond the leakage belt cannot be attributed to the project area, then that deforestation doesn't have to be taken into account. |
| Verra Response | We have not adopted the commenter's suggestion around eliminating the need for a project to take into account deforestation outside the leakage belt on the grounds that |

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| | it would be difficult for a project proponent to demonstrate that deforestation beyond the leakage belt could not be attributed to their project area. |
| Aster Global Assessment | The assessment team deems this response to be sufficient to address comment. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | We have not adopted the commenter's suggestion around eliminating the need for a project to take into account deforestation outside the leakage belt on the grounds that it would be difficult for a project proponent to demonstrate that deforestation beyond the leakage belt could not be attributed to their project area. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.16 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS) General comments</p> <ul style="list-style-type: none"> Leakage is considered, in general, to be driven by agriculture. This LK module does not reflect approaches taking into account other activities that can be a source of leakage such as mining. We would suggest that this is expanded to include other activities, in particular mining. |
| Verra Response | <p>Mining as a cause of leakage could be considered under the factors physical accessibility and relative protection status in Appendix 2 A2.1. In A2.2, assuming long-term agriculture is more conservative (in general) than assuming mining as a default alternative land use. The description of the leakage belt (Section 5.2.2) has been revised. The suggestion about noting that emissions from fire were considered in the baseline scenario was adopted (Section 5.3.3.2). EFC,i,t has been replaced by E,BSL,FC,i,t in Section 5.3.3.3 equation (42). The phrase "Determine if AS analysis is needed" has been removed. The proportion of households to be sampled has been changed; hopefully the commenter agrees that it is less burdensome as revised (Section 5.3.3.4). PROPurban has been removed.</p> |
| Aster Global Assessment | The assessment team is unsure of how physical accessibility can fully accommodate mining leakage as the Appendix 2 A2.1 states this land must be arable. |
| Aster Global Initial Findings | CL: Please further address comment, in line with finding. |
| Round 1 Response from Methodology Developer | Mining isn't ignored, it is assessed as though it leaks to agricultural land. It is not realistic to produce jurisdictional maps for all commodities. Agriculture is the dominant driver in most places and assuming that all leakages outside the belt are agriculture-driven is conservative. |
| Aster Global Findings Round 2 | A2.1 Step 1 does appear to ignore mining. It is unclear how is assessed as though it leaks to agricultural land, as written in the module. |
| Round 2 NCR/CL/OFI2 | CL: Please clarify how mining is not ignored in A2.1 Step 1; perhaps this should be a point of discussion in a meeting to discuss findings. |

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| Round 2 Response from Methodology Developer | <p>Updated Verra response to original comment:</p> <p>The leakage assessment approach is agnostic with regard to the driver of the loss of forest cover. In the leakage belt all losses of forest cover that exceed the baseline allocation will be accounted as leakage caused by the project with emission factors applied according to forest stratification. For leakage by mobile agent then the baseline agent of deforestation could be someone practicing mining just as easily as it could be someone practicing agriculture. A sampling approach is required to calculate the immigrant proportion PROPIMM and this proportion is assumed to leak (equally true for mining and agriculture as a baseline driver).</p> <p>NOTE FOR ASTER: A2.1 Step 1 is a procedure that is followed to demonstrate that available forest for agriculture does not form a limiting factor in ability for leakage to occur. It is expected that in the large majority of jurisdictions such a limitation does not exist and the area for leakage is no constraint. A similar analysis could be conducted of areas of forest with potential mining applicability but it is conservative to assume no such limitation exists. The step also sets up the area over which the emission factor is determined. Again this will be conservative relative to mining as areas unsuitable for agriculture are likely to have lower carbon stocks.</p> |
| Aster Global Findings Round 3 | The Assessment Team acknowledges that the estimation of PropIMM may be inclusive of mining, agriculture, or other land use activities leading to deforestation. Hence, the original comment is deemed to have been addressed. |
| Status | closed R3 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The leakage assessment approach is agnostic with regard to the driver of the loss of forest cover. In the leakage belt all losses of forest cover that exceed the baseline allocation will be accounted as leakage caused by the project with emission factors applied according to forest stratification. For leakage by mobile agent then the baseline agent of deforestation could be someone practicing mining just as easily as it could be someone practicing agriculture. A sampling approach is required to calculate the immigrant proportion PROPIMM and this proportion is assumed to leak (equally true for mining and agriculture as a baseline driver). |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.17 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS) General comments <ul style="list-style-type: none"> The proposed approach is more complex, and it would be helpful to have visual explanations for each of the options, i.e. land aggregation, GU identification of lands, etc. (similar to what Verra did for the VCS JNR scenarios 1, 2 and 3). |
| Verra Response | LK-UD-AS: Data service providers will conduct the outside the leakage belt analysis (Appendix 2), so this should not but burden on the project proponent or result in more than one map for a jurisdiction and it should be doable over an entire country. Adding differentiation by different commodities would add unnecessary complexity, but we will consider it in the future and would welcome the commenter to provide suitable |

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| | <p>language. We have not adopted the commenter's suggestion around eliminating the need for a project to take into account deforestation outside the leakage belt on the grounds that it would be difficult for a project proponent to demonstrate that deforestation beyond the leakage belt could not be attributed to their project area. Mining as a cause of leakage could be considered under the factors physical accessibility and relative protection status in Appendix 2 A2.1. In A2.2, assuming long-term agriculture is more conservative (in general) than assuming mining as a default alternative land use. The description of the leakage belt (Section 5.2.2) has been revised. The suggestion about noting that emissions from fire were considered in the baseline scenario was adopted (Section 5.3.3.2). EFC,i,t has been replaced by E,BSL,FC,i,t in Section 5.3.3.3 equation (42). The phrase "Determine if AS analysis is needed" has been removed. The proportion of households to be sampled has been changed; hopefully the commenter agrees that it is less burdensome as revised (Section 5.3.3.4). PROPurban has been removed.</p> |
| Aster Global Assessment | Verra's response did not directly address this comment. |
| Aster Global Initial Findings | CL: Please address comment. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing the original public comment: The approach to estimate leakage has been updated and simplified since the version that was commented on. The new version address the need for visual explanation of the different approaches because there are now only two approaches, both applicable to all projects: one to assess leakages of activities that are geographically constrained and one to estimate the risk of displacement of activities that are geographically not constrained. |
| Aster Global Findings Round 2 | The methodology developer has indicated that the approach the commenter is referencing has since been simplified. A visual explanation of the new, simplified approach is included, thus addressing the comment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The approach to estimate leakage has been updated and simplified since the version that was commented on. The new version address the need for visual explanation of the different approaches because there are now only two approaches, both applicable to all projects: one to assess leakages of activities that are geographically constrained and one to estimate the risk of displacement of activities that are geographically not constrained. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.18 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general | Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS) Detailed G comments: • Page 6 - Spatial Boundaries: The sentence "As leakage belts for an AUD Project |

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| questions & comments | Area shall not intersect the Leakage Belts or Project Areas of other AUD projects" is hard to interpret. Could you simplify it? |
| Verra Response | LK-UD-AS: The description of the leakage belt (Section 5.2.2) has been revised. |
| Aster Global Assessment | The assessment team has confirmed the language concerning the spatial boundaries of the leakage belt have been revised. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The language, while still complex, is simpler, with fewer acronyms. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.19 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS)</p> <p>Detailed comments:</p> <ul style="list-style-type: none"> • Page 6 - Spatial Boundaries: The sentence "Wherever two or more leakage belts from different projects intersect, the area of overlap shall be subdivided and allocated among leakage belts such that: [...] the distance between each subdivision and the associated PAs are minimized." is unclear. Does it refer to the fact that a given LB area must be as close as possible to its respective PA? Or does it refer to a different concept? This bullet point should perhaps be reformulated for higher clarity. |
| Verra Response | LK-UD-AS: The description of the leakage belt (Section 5.2.2) has been revised. |
| Aster Global Assessment | Verra's generic comment does not provide a specific response. |
| Aster Global Initial Findings | CL: Please address comment. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing the original public comment:</p> <p>The provisions for overlapping leakage belts have been adjusted and clarified in the new version fo the methodology. The project LB will be delineated by Verra based on the most recent jurisdictional FCBM. PP are resopnsible to exclude from their LB existing project areas. It is also clarified that Leakage emissions associated with other overlapping VCS REDD project LB(s) may be omitted by the project where:</p> <ul style="list-style-type: none"> - An LB agreement is signed between the project proponents that clearly defines the location of the boundaries of the different LB areas overlapping with UDef LB, as well as the related monitoring responsibilities; and - The other VCS REDD project has submitted a verification report in the last five years. Where the other VCS REDD project ends or fails to present a verification report for more than five consecutive years, the excluded areas and discounted AD are reintroduced to UDef LB. |

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| | <p>The omission only applies to the UDef LB portions that will be monitored by the other project, as per the LB agreement. When leakage emissions are omitted, the project must discount the corresponding allocated Baseline AD. The project description must clearly describe the excluded areas and the related discounting calculations. Post-validation changes must be described and assessed by the VVB as project description deviations.</p> <p>Explanation of revisions to original comment: The leakage section was revised so significantly that we deemed it prudent to simply direct the commenter to it. However, we have added in more detail in the revised version.</p> |
| Aster Global Findings Round 2 | The assessment team acknowledges that the leakage section has been significantly revised. The additional clarification provided is sufficient to address the commenter's concern of the initial leakage module. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>The provisions for overlapping leakage belts have been adjusted and clarified in the new version of the methodology. The project LB will be delineated by Verra based on the most recent jurisdictional FCBM. PPs are responsible to exclude from their LB existing project areas. It is also clarified that leakage emissions associated with other overlapping VCS REDD project LB(s) may be omitted by the project where:</p> <ul style="list-style-type: none"> - An LB agreement is signed between the project proponents that clearly defines the location of the boundaries of the different LB areas overlapping with UDef LB, as well as the related monitoring responsibilities; and - The other VCS REDD project has submitted a verification report in the last five years. Where the other VCS REDD project ends or fails to present a verification report for more than five consecutive years, the excluded areas and discounted AD are reintroduced to UDef LB. <p>The omission only applies to the UDef LB portions that will be monitored by the other project, as per the LB agreement. When leakage emissions are omitted, the project must discount the corresponding allocated Baseline AD. The project description must clearly describe the excluded areas and the related discounting calculations. Post-validation changes must be described and assessed by the VVB as project description deviations.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.2 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS) Detailed comments: • Page 6 - Spatial Boundaries: "The current map of all PAs and LBs for a jurisdiction should be continuously updated and made available publicly available through the |

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| | Verra Registry". It is unclear from this sentence who is responsible for updating the jurisdictional maps. |
| Verra Response | LK-UD-AS: Data service providers will conduct the outside the leakage belt analysis (Appendix 2), so this should not but burden on the project proponent or result in more than one map for a jurisdiction and it should be doable over an entire country. Adding differentiation by different commodities would add unnecessary complexity, but we will consider it in the future and would welcome the commenter to provide suitable language. We have not adopted the commenter's suggestion around eliminating the need for a project to take into account deforestation outside the leakage belt on the grounds that it would be difficult for a project proponent to demonstrate that deforestation beyond the leakage belt could not be attributed to their project area. Mining as a cause of leakage could be considered under the factors physical accessibility and relative protection status in Appendix 2 A2.1. In A2.2, assuming long-term agriculture is more conservative (in general) than assuming mining as a default alternative land use. The description of the leakage belt (Section 5.2.2) has been revised. The suggestion about noting that emissions from fire were considered in the baseline scenario was adopted (Section 5.3.3.2). EFC,i,t has been replaced by E,BSL,FC,i,t in Section 5.3.3.3 equation (42). The phrase "Determine if AS analysis is needed" has been removed. The proportion of households to be sampled has been changed; hopefully the commenter agrees that it is less burdensome as revised (Section 5.3.3.4). PROPurban has been removed. |
| Aster Global Assessment | Verra's response did not directly address this comment. |
| Aster Global Initial Findings | CL: Please address comment. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing the original public comment: The sentence referred to has been removed from the new version of the methodology. The exclusion of existing VCS AFOLU projects from the LB is the PP's responsibility (and the VVB's responsibility to audit). The Verra Registry can be used to identify and upload KML files for other project areas. Verra is working on a mapping tool to facilitate the identification or surrounding project areas and upload their KML file. |
| Aster Global Findings Round 2 | The methodology developer has clarified the referenced sentence has been removed from the methodology. Further clarification has been provided that the onus is on the Project Proponent/VVB to appropriately exclude existing VCS AFOLU projects from the leakage belt. It is unclear why the original sentence was removed and what the implications on the project will be for accessing this spatial data. |
| Round 2 NCR/CL/OFI2 | CL: Please clarify why Verra removed the original sentence and considers it reasonable/appropriate for PPs to access and produce and VVBs to confirm the spatial data for all existing nearby projects' boundaries and leakage belts, as the response implies. |
| Round 2 Response from Methodology Developer | Revised Verra comment addressing the original public comment: The sentence referred to has been removed from the new version of the methodology. The exclusion of existing VCS AFOLU projects from the LB is the PP's responsibility (and the VVB's responsibility to audit). The Verra Registry can be used to identify and upload KML files for other project areas. Verra is working on a tool to facilitate project proponents' ability to identify of surrounding project areas and upload their KML file (this tool is a function of the Project Hub and totally unassociated with this methodology). Note for Aster: The original sentence was removed in the initial version of the module shared with Aster. It was removed because the information won't be collected in a specific map, but is available in the Registry already. Section 5.1.3 clarifies that : " <i>The exclusion enters into force and related leakage emissions may be omitted once the other VCS AFOLU projects have submitted an initial verification report to the Verra Registry but</i> |

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| | <p><i>no sooner than the other projects' start date"</i> At the time a project submits a verification report, a KML file has been submitted for both the PA and for the LB. This section of the methodology will evolve when a specific tool (currently under development) will be made available.</p> <p>Projects that are active in a jurisdiction are expected to be aware of existing or under-development projects.</p> |
| Aster Global Findings Round 3 | The assessment team notes that the referenced sentence was removed in the initial version of the module. The methodology developer has provided clarification regarding the rationale behind PPs excluding AFOLU projects from their leakage belts. Item addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The sentence referred to has been removed from the new version of the methodology. The exclusion of existing VCS AFOLU projects from the LB is the PP's responsibility (and the VVB's responsibility to audit). The Verra Registry can be used to identify and upload KML files for other project areas. Verra is working on a tool to facilitate project proponents' ability to identify surrounding project areas and upload their KML file (this tool is a function of the Project Hub and totally unassociated with this methodology). |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.21 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS)</p> <p>Detailed comments:</p> <ul style="list-style-type: none"> • Page 8 - Other deforestation and degradation emissions within the leakage belt during the monitoring period: For the following sentence: "For example, where deforestation occurs within the AUD Leakage Belt and fire is used as a means of forest clearance¹ the non-CO₂ emissions may be significant", we suggest the following addition for clarity: "fire is used as a means of forest clearance and these emissions are not already considered in the baseline scenario [...]" |
| Verra Response | LK-UD-AS: The suggestion about noting that emissions from fire were considered in the baseline scenario was adopted (Section 5.3.3.2). EFC,i,t has been replaced by E,BSL,FC,i,t in Section 5.3.3.3 equation (42). The phrase "Determine if AS analysis is needed" has been removed. |
| Aster Global Assessment | The assessment team has confirmed this suggestion was incorporated into the Module. |
| Status | drafted |
| Response Updated Since Finding Closed? | wording/typo updates |

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| Revised Verra Response October 2023 | The suggestion about noting that emissions from fire were considered in the baseline scenario was adopted (Section 5.3.3.2). AUDef Section 5.3.4.3 has been changed to read " For example, where deforestation occurs in the UDef LB and fire is used as a means of forest clearance, the non-CO2 emissions may be significant." |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.22 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS) Detailed comments: • Page 8 - Other deforestation and degradation emissions within the leakage belt during the monitoring period: "EFC,i,t è Emission from fossil fuel combustion in stratum i within the AUD Leakage Belt in year t of the Baseline; t C02-e". Isn't this mixing two different concepts i.e., GHG emissions from the LB vs PA? Shouldn't this be in the PA? Since the calculation is on a per hectare basis, we don't think it makes sense to monitor the fossil fuel use in the LB. Rather, one should assume the same average as observed in the PA baseline. Is that correct? |
| Verra Response | LK-UD-AS: EFC,i,t has been replaced by E,BSL,FC,i,t in Section 5.3.3.3 equation (42). |
| Aster Global Assessment | Eq 42 does not contain this parameter. |
| Aster Global Initial Findings | CL: Please respond to original comment. The assessment team suggests directly addressing the comment rather than referencing an equation # which may be subject to change during revisions. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing the original public comment: Deforestation comes with other emissions than the biomass loss, including biomass burning and fossil fuel. Such emissions are accounted for in the baseline and must be accounted for in the LB. Not accounting for it would lead to underestimating the emissions due to leakage. |
| Aster Global Findings Round 2 | The assessment team notes that a direct response addressing the comment has now been provided. Item addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Deforestation comes with other emissions than the biomass loss, including biomass burning and fossil fuel. Such emissions are accounted for in the baseline and must be accounted for in the LB. Not accounting for it would lead to underestimating the emissions due to leakage. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |

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| Comment # | 378.23 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS) Detailed comments: • Page 10 - Emissions from Activity Shifting due to displacement: "Determine if Activity Shifting analysis is required". What determines whether the analysis is needed? Is there any guidance from VERRA about it including somewhere else in the methodology? If so, please cross-reference and make clear. |
| Verra Response | LK-UD-AS: The phrase "Determine if AS analysis is needed" has been removed. |
| Aster Global Assessment | The assessment team has confirmed this revision was incorporated into the Module; the analytical procedures for determining leakage from activity shifting is included in 5.3.3 |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The phrase "Determine if AS analysis is needed" has been removed. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.24 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS) Detailed comments: • Page 11 - Estimation of the proportion of immigrant and resident land cover transition agents in the baseline: "Randomly sample households [...] The minimum sample size of respondents shall be at least 1100 households ^{2,3} . If the total number of households is less than 1100, then the sample size must be at least 80% of the households.". This approach can become a barrier for the financial feasibility of projects and we would suggest to Verra to consider other conservative, but more streamlined approaches to this. |
| Verra Response | LK-UD-AS: The proportion of households to be sampled has been changed; hopefully the commenter agrees that it is less burdensome as revised (Section 5.3.3.4). PROPurban has been removed. |
| Aster Global Assessment | Is it onerous on the PP to achieve an 80% response rate? Response rates can be low and methods to increase response rates can be financially burdensome (Allread and Ross-Davis. 2011. The Drop-off and Pick-up Method: An Approach to Reduce |

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| | Nonresponse Bias in Natural Resource Surveys. Small-scale Forestry 10:305-318. DOI: 10.1007/s11842-010-9150-y) |
| Aster Global Initial Findings | CL: Please clarify in response to finding |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing the original public comment: The minimum number of samples has been reduced to 200 households or 80% of the households where the number of households is less than 250. This sampling is reasonable for a REDD project that must spend sufficient resources to understand and assess the drivers of deforestation surrounding the PA. While this effort sounds burdensome to PPs, the data can be collected as part of other surveys (e.g., PRA) to be implemented to identify the agents and drivers which are key to the long-term success of a project.</p> <p>Explanation of original Verra response: We did not change our original position but we have added more detail here.</p> <p>Response to additional points raised by Aster: As noted above, we think the effort to collect this data can be incorporated into other activities undertaken by the REDD project.</p> |
| Aster Global Findings Round 2 | The assessment team notes that the minimum number of samples has been significantly decreased from 1,100 to 200/80% if less than 250. The methodology developer has provided additional justification for the rationale of these sampling requirements. This item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The minimum number of samples has been reduced to 200 households or 80% of the households where the number of households is less than 250. This sampling is reasonable for a REDD project that must spend sufficient resources to understand and assess the drivers of deforestation surrounding the PA. While this effort sounds burdensome to PPs, the data can be collected as part of other surveys (e.g., PRA) to be implemented to identify the agents and drivers which are key to the long-term success of a project. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.25 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS) Detailed comments: Page 11 - Estimate the relative rate of migration to urban versus rural areas: "PROPurban should be calculated using empirical observations". Could you include which parameters will be used to determine the validity of the PROPurban calculations, or cross-reference? |
| Verra Response | LK-UD-AS: PROPurban has been removed. |

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| Aster Global Assessment | The assessment team has confirmed this revision was incorporated into the Module |
| Status | closed R1 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | The proportion of households to be sampled has been changed; hopefully the commenter agrees that it is less burdensome as revised (AUDef Section 5.3.43.4). |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.26 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS) Detailed comments:</p> <ul style="list-style-type: none"> • Page 12 - Determine if Activity Shifting to outside the leakage belt must be evaluated: "If {PROP/MM * {1- PROPurban}} is less than or equal to 0.1, no activity shifting to outside the leakage belt is assessed". We assume this equates to a tolerance of 10% displacement of people before starting to calculate leakage. In small projects this makes sense. But does this make sense for projects covering big areas or with many households included, especially now that jurisdictional approaches are taking momentum? |
| Verra Response | <p>LK-UD-AS: Data service providers will conduct the outside the leakage belt analysis (Appendix 2), so this should not but burden on the project proponent or result in more than one map for a jurisdiction and it should be doable over an entire country. Adding differentiation by different commodities would add unnecessary complexity, but we will consider it in the future and would welcome the commenter to provide suitable language. We have not adopted the commenter's suggestion around eliminating the need for a project to take into account deforestation outside the leakage belt on the grounds that it would be difficult for a project proponent to demonstrate that deforestation beyond the leakage belt could not be attributed to their project area. Mining as a cause of leakage could be considered under the factors physical accessibility and relative protection status in Appendix 2 A2.1. In A2.2, assuming long-term agriculture is more conservative (in general) than assuming mining as a default alternative land use. The description of the leakage belt (Section 5.2.2) has been revised. The suggestion about noting that emissions from fire were considered in the baseline scenario was adopted (Section 5.3.3.2). EFC,i,t has been replaced by E,BSL,FC,i,t in Section 5.3.3.3 equation (42). The phrase "Determine if AS analysis is needed" has been removed. The proportion of households to be sampled has been changed; hopefully the commenter agrees that it is less burdensome as revised (Section 5.3.3.4). PROPurban has been removed.</p> |
| Aster Global Assessment | This analytical procedures has changed substantially enough as to make this comment no longer relevant. |
| Status | closed R1 |

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| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | PropUrban has been removed. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.27 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS) Detailed comments:</p> <ul style="list-style-type: none"> • Page 12 - Delineation of area of land available for activity shifting leakage outside of PA and LB: "1} Suitability of land for agriculture[...] 2} Physically accessibility[...] 3} Relative protection status. Each of these three factors must be developed as a map that covers the entire country containing the jurisdiction". Is this practical for countries covering big extensions, for example Brazil? |
| Verra Response | <p>LK-UD-AS: Data service providers will conduct the outside the leakage belt analysis (Appendix 2), so this should not but burden on the project proponent or result in more than one map for a jurisdiction and it should be doable over an entire country. Adding differentiation by different commodities would add unnecessary complexity, but we will consider it in the future and would welcome the commenter to provide suitable language. We have not adopted the commenter's suggestion around eliminating the need for a project to take into account deforestation outside the leakage belt on the grounds that it would be difficult for a project proponent to demonstrate that deforestation beyond the leakage belt could not be attributed to their project area. Mining as a cause of leakage could be considered under the factors physical accessibility and relative protection status in Appendix 2 A2.1. In A2.2, assuming long-term agriculture is more conservative (in general) than assuming mining as a default alternative land use. The description of the leakage belt (Section 5.2.2) has been revised. The suggestion about noting that emissions from fire were considered in the baseline scenario was adopted (Section 5.3.3.2). EFC,i,t has been replaced by E,BSL,FC,i,t in Section 5.3.3.3 equation (42). The phrase "Determine if AS analysis is needed" has been removed. The proportion of households to be sampled has been changed; hopefully the commenter agrees that it is less burdensome as revised (Section 5.3.3.4). PROPurban has been removed.</p> |
| Aster Global Assessment | The comment expresses concern for delineating leakage over large jurisdictions. The assessment team believes Verra has not directly responded to this comment. |
| Aster Global Initial Findings | CL: Please address comment. |
| Round 1 Response from | Revised Verra comment addressing the original public comment: The data referred to in the comment will be collected by the DSP at the scale of a jurisdiction. Big countries such as Brazil are divided into smaller jurisdiction (in the Brazilian case, States) |

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| Methodology Developer | |
| Aster Global Findings Round 2 | The methodology developer has clarified that the referenced data will be collected at the jurisdiction level. As the commenter referenced Brazil specifically, the methodology developer took due account by clarifying that large countries (such as Brazil) will be divided into smaller jurisdictions. Item closed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The data referred to in the comment will be collected by the DSP at the scale of a jurisdiction. Big countries such as Brazil are divided into smaller jurisdiction (in the Brazilian case, States) |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.28 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS)</p> <p>Detailed comments:</p> <ul style="list-style-type: none"> •Page 13 - Potentially Arable Land: "A lower limit of mean annual precipitation be established for rainfed agriculture in the country[...]". Again, project proponents operating in highly biodiverse countries will struggle to have their selected values validated. For example, the lower limit on annual precipitation won't be the same in dry forest of the Colombian Caribbean and in the Orinoco basin. Would it make more sense to work through biomes within countries? |
| Verra Response | <p>LK-UD-AS: Data service providers will conduct the outside the leakage belt analysis (Appendix 2), so this should not but burden on the project proponent or result in more than one map for a jurisdiction and it should be doable over an entire country. Adding differentiation by different commodities would add unnecessary complexity, but we will consider it in the future and would welcome the commenter to provide suitable language. We have not adopted the commenter's suggestion around eliminating the need for a project to take into account deforestation outside the leakage belt on the grounds that it would be difficult for a project proponent to demonstrate that deforestation beyond the leakage belt could not be attributed to their project area. Mining as a cause of leakage could be considered under the factors physical accessibility and relative protection status in Appendix 2 A2.1. In A2.2, assuming long-term agriculture is more conservative (in general) than assuming mining as a default alternative land use. The description of the leakage belt (Section 5.2.2) has been revised. The suggestion about noting that emissions from fire were considered in the baseline scenario was adopted (Section 5.3.3.2). EFC,i,t has been replaced by E,BSL,FC,i,t in Section 5.3.3.3 equation (42). The phrase "Determine if AS analysis is needed" has been removed. The proportion of households to be sampled has been changed; hopefully the commenter agrees that it is less burdensome as revised (Section 5.3.3.4). PROPurban has been removed.</p> |

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| Aster Global Assessment | The comment expresses concern for delineating leakage over jurisdictions with variable biomes/climates. The assessment team believes Verra has not directly responded to this comment. |
| Aster Global Initial Findings | CL: Please address comment. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing the original public comment: The production of jurisdictional data for leakages outside of the LB is now the responsibility of the DSP. The risk mentioned in the comment is no longer relevant. |
| Aster Global Findings Round 2 | The methodology developer clarified that the risk mentioned in the comment is no longer relevant, as it is no longer included in the module. This item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The production of jurisdictional data for leakages outside of the LB is now the responsibility of the DSP. The risk mentioned in the comment is no longer relevant. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.29 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Estimation of emissions from activity shifting for avoided unplanned deforestation (LK-UD-AS) Detailed comments: • Page 14 Physical Accessibility: "All areas mapped as requiring more than two hours to access on foot from travel networks shall be considered inaccessible[...]". This approach seems valid for edible goods and other "normal" i.e., legal, goods. However, coca growers for example walk, on average, more than 2 hours to deliver their cargo. Hence, we would suggest that Verra creates scenarios to factor in different commodities, orography, social aspects, etc., to account for these differences. |
| Verra Response | LK-UD-AS: Data service providers will conduct the outside the leakage belt analysis (Appendix 2), so this should not but burden on the project proponent or result in more than one map for a jurisdiction and it should be doable over an entire country. Adding differentiation by different commodities would add unnecessary complexity, but we will consider it in the future and would welcome the commenter to provide suitable language. We have not adopted the commenter's suggestion around eliminating the need for a project to take into account deforestation outside the leakage belt on the grounds that it would be difficult for a project proponent to demonstrate that deforestation beyond the leakage belt could not be attributed to their project area. Mining as a cause of leakage could be considered under the factors physical accessibility and relative protection status in Appendix 2 A2.1. In A2.2, assuming long-term agriculture is more conservative (in general) than assuming mining as a default |

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| | <p>alternative land use. The description of the leakage belt (Section 5.2.2) has been revised. The suggestion about noting that emissions from fire were considered in the baseline scenario was adopted (Section 5.3.3.2). EFC,i,t has been replaced by E,BSL,FC,i,t in Section 5.3.3.3 equation (42). The phrase "Determine if AS analysis is needed" has been removed. The proportion of households to be sampled has been changed; hopefully the commenter agrees that it is less burdensome as revised (Section 5.3.3.4). PROPurban has been removed.</p> |
| Aster Global Assessment | The revisions to the module have substantially changed the qualifiers of accessible land. This comment does not need to be addressed. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Adding differentiation by different commodities would add unnecessary complexity, but we will consider it in the future and would welcome the commenter to provide suitable language. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.3 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Determination of jurisdictional activity data baseline For unplanned deforestation {J-ADB-UD) General comments</p> <ul style="list-style-type: none"> • This module is fully under Verra and Verra's providers' scope, so Proponents can only use these requirements For informational purposes, but not For any use. This is clear and makes sense in the overall structure of the modules, but in section 5.3.3 it is noted that Proponents will get the opportunity to provide project FCBMs. We suggest making clear upfront or in a table what the role/responsibility/input from Proponents is vs Verra's provider. |
| Verra Response | <p>LK-UD-AS: Data service providers will conduct the outside the leakage belt analysis (Appendix 2), so this should not but burden on the project proponent or result in more than one map for a jurisdiction and it should be doable over an entire country. Adding differentiation by different commodities would add unnecessary complexity, but we will consider it in the future and would welcome the commenter to provide suitable language. We have not adopted the commenter's suggestion around eliminating the need for a project to take into account deforestation outside the leakage belt on the grounds that it would be difficult for a project proponent to demonstrate that deforestation beyond the leakage belt could not be attributed to their project area. Mining as a cause of leakage could be considered under the factors physical accessibility and relative protection status in Appendix 2 A2.1. In A2.2, assuming long-term agriculture is more conservative (in general) than assuming mining as a default alternative land use. The description of the leakage belt (Section 5.2.2) has been revised. The suggestion about noting that emissions from fire were considered in the baseline scenario was adopted (Section 5.3.3.2). EFC,i,t has been replaced by E,BSL,FC,i,t in Section 5.3.3.3 equation (42). The phrase "Determine if AS analysis is needed" has been removed. The proportion of households to be sampled has been</p> |

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| | changed; hopefully the commenter agrees that it is less burdensome as revised (Section 5.3.3.4). PROPurban has been removed. |
| Aster Global Assessment | The assessment team believes Verra has not directly responded to this comment. |
| Aster Global Initial Findings | CL: Please address comment. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing the original public comment: The structure of the <i>AUDef</i> module now clarifies the responsibilities. In the core document are provided all requirements and processes to be followed by the PP. Appendices 1 and 2 are all requirements and processes for the DSP. In addition, Appendix 4 clarifies what data (including the <i>FCBMp</i>) <i>can be provided by the PP</i> . |
| Aster Global Findings Round 2 | The assessment team concurs that the referenced responsibilities have now been clarified in the appendices of the module, thus addressing this comment. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The structure of the <i>AUDef</i> module now clarifies the responsibilities. In the core document are provided all requirements and processes to be followed by the PP. Appendices 1 and 2 are all requirements and processes for the DSP. In addition, Appendix 4 clarifies what data (including the <i>FCBMp</i>) <i>can be provided by the PP</i> . |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.31 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Determination of jurisdictional activity data baseline For unplanned deforestation {J-ADB-UD) General comments <ul style="list-style-type: none"> The current approach to historical avoided deforestation development includes data from existing active VCS projects themselves, as well as within non-project areas. This means that the activity data reference level is no longer independent of the performance of existing VCS projects taking place within the jurisdiction. However, VCS states that a Baseline Scenario is "activities and GHG emissions that would occur in the absence of the project activity." We recommend that historical deforestation only be assessed within areas of the jurisdiction not included within any VCS registered and active project areas, and then the AD scaled up to consider the proportion of at-risk forest already under protection. |
| Verra Response | J-ADB-UD: The assessment of historical deforestation in Appendix 1 will include VCS projects since in this methodology there are no longer reference regions. |
| Aster Global Assessment | The assessment team believes this has not been fully addressed; i.e., it has not stated why the lack of reference regions means a baseline scenario can include VCS projects. |
| Aster Global Initial Findings | CL: Please address comment, in line with finding. |

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| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: Verra has extensively considered this question and decided to include projects in the jurisdictional sampling frame. The allocation approach differs from the reference region approach. With this new approach, the baseline emissions against which the project can assess its performance, are allocated based on the historical deforestation observed in a jurisdiction and on the level of risks of specific areas. At the stage of activity data development, including projects in the sampling frame actually results in higher allocation to projects, because more deforestation will be calculated within the jurisdiction.</p> <p>The real issue raised comes in at the stage of the risk map development. The existence of projects will impact the historical deforestation, but will increase the level of risk of a non-project area compared to a project area. Verra acknowledges that projects that successfully reduce deforestation may under some risk models generate lower baselines. Verra is continuing to evaluate the risk mapping tool to determine the appropriate balance of conservativeness but also not producing perverse incentives for projects.</p> <p>Including any deforestation inside project areas means the allocation will take into account all deforestation in the jurisdiction. Otherwise, any remaining deforestation in the project areas would be excluded and not allocated.</p> |
| Aster Global Findings Round 2 | The methodology developer has provided additional clarification detailing the rationale regarding reference regions and baseline scenarios and how they pertain to inclusion of VCS projects. The assessment team has determined this item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Verra has extensively considered this question and decided to include projects in the jurisdictional sampling frame. The allocation approach differs from the reference region approach. With this new approach, the baseline emissions against which the project can assess its performance, are allocated based on the historical deforestation observed in a jurisdiction and on the level of risks of specific areas. At the stage of activity data development, including projects in the sampling frame actually results in higher allocation to projects, because more deforestation will be calculated within the jurisdiction. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.32 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Determination of jurisdictional activity data baseline For unplanned deforestation {J-ADB-UD) General comments <ul style="list-style-type: none"> • The Jurisdictional baseline only looks at deforestation. How will degradation be taken into account? |

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| Verra Response | J-ADB-UD: Unplanned forest degradation will be taken into account in a supplementary module under VM0184 or - for planned degradation - through complementary IFM methodologies. |
| Aster Global Assessment | The assessment team understands a future module will address unplanned degradation. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | Unplanned forest degradation will be taken into account in a supplementary module under VM0048 or - for planned degradation - through complementary IFM methodologies. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.33 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Determination of jurisdictional activity data baseline For unplanned deforestation (J-ADB-UD) General comments</p> <ul style="list-style-type: none"> • It is unclear whether the third party who will determine the historical avoided deforestation and ultimately create the jurisdictional FCBM must prove their experience and competence in order to undertake this work. Will Verra or an independent body assess the proposals before the work is undertaken, in addition to a validation afterwards? Will several contractors be able to submit proposals for undertaking the work required in the J-ADB-UD? i.e. will Verra be able to select the most competent contractor for a specific Jurisdiction, especially since some of the mapping work requires a good knowledge of the land cover and land use processes on the ground (e.g. distinguishing between planned and unplanned deforestation)? |
| Verra Response | J-ADB-UD: Appendix 4 now sets out clearly what supplemental materials stakeholders may provide to data service providers/Verra. The assessment of historical deforestation in Appendix 1 will include VCS projects since in this methodology there are no longer reference regions. Unplanned forest degradation will be taken into account in a supplementary module under VM0184 or - for planned degradation - through complementary IFM methodologies. Requirements for data service providers are set out in the rolling expression of interest (https://verra.org/wp-content/uploads/EOI-Allocation-Data-service-providers.pdf) and periodic requests for proposals (e.g., https://verra.org/wp-content/uploads/2023/04/RFP-Dvpt-of-Jurisdictional-AD-and-FCBMs-for-VCS-AUDef-Projects-17-Apr-2023.pdf). |
| Aster Global Assessment | The module states "Verra will select and contract an approved data service provider considering their technical expertise, experience in the chosen jurisdiction, financial offer and ability to deliver within the pre-determined timeframe.". And, congruent with the response from Verra, an independent expert assessment of jurisdictional data will be conducted. But the assessment team also considers that Verra's preferences for DSPs does not include competencies/qualifications (e.g. years of experience utilizing specific skillsets, capacity of personnel, education, etc.). |

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| Aster Global Initial Findings | OFI: Given that several comments have raised several concerns about the quality of DSPs, can Verra provide additional criteria, whether binary (e.g. yrs. experience) or qualitative to lend credence to the DSP selection process. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment: J-ADB-UD: Appendix 4 now sets out clearly what supplemental materials stakeholders may provide to data service providers/Verra. The assessment of historical deforestation in Appendix 1 will include VCS projects since in this methodology there are no longer reference regions. Unplanned forest degradation will be taken into account in a supplementary module under VM0184 or - for planned degradation - through complementary IFM methodologies. Requirements for data service providers are set out in the rolling expression of interest (https://verra.org/wp-content/uploads/EOI-Allocation-Data-service-providers.pdf) and periodic requests for proposals (e.g., https://verra.org/wp-content/uploads/2023/04/RFP-Dvpt-of-Jurisdictional-AD-and-FCBMs-for-VCS-AUDef-Projects-17-Apr-2023.pdf)</p> <p>Verra uses quality (80%) and cost-based (20%) selection of the DSPs. The following criteria are used to select DSPs:</p> <ol style="list-style-type: none"> 1) Understanding and experience with VCS and REDD meth 2) Plans for engaging with governments and stakeholders 3) Technical approach for AD and FCBM development and OLB mapping 4) Work plan and timing for final delivery 5) Organization's qualification/viability <p>Explanation of original Verra Response: Original comment was comprehensive and accurate; we pulled in specifics from the referenced docs</p> <p>Response to additional points raised by Aster: Verra has provided additional context around the tender process for DSPs. However, Verra expects the selection criteria for DSPs to evolve continuously through experience, and to be outside the scope of the AUDef module itself. Verra will strive to ensure that in future calls for proposals, maximal transparency will be provided on qualifications and selection criteria for DSPs.</p> |
| Aster's initial response is in/out of scope for VVB review | out of scope |
| Aster Global Findings Round 2 | Verra has stated that this public comment is out of scope and will not be reviewed by the assessment team. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>J-ADB-UD: AUDef Appendix 4 now sets out clearly what supplemental materials stakeholders may provide to data service providers/Verra.</p> <p>The assessment of historical deforestation in AUDef Appendix 1 will include VCS projects since in this methodology there are no longer reference regions.</p> <p>Unplanned forest degradation will be taken into account in a supplementary module under VM0048 or - for planned degradation - through complementary IFM methodologies.</p> |

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| | <p>Requirements for data service providers are set out in the rolling expression of interest (https://verra.org/wp-content/uploads/EOI-Allocation-Data-service-providers.pdf) and periodic requests for proposals (e.g., https://verra.org/wp-content/uploads/2023/04/RFP-Dvpt-of-Jurisdictional-AD-and-FCBMs-for-VCS-AUDef-Projects-17-Apr-2023.pdf)</p> <p>Verra uses quality (80%) and cost-based (20%) selection of the DSPs. The following criteria have been used to select DSPs: 1) Understanding and experience with VCS and REDD meth; 2) Plans for engaging with governments and stakeholders; 3) Technical approach for AD and FCBM development and OLB mapping; 4) Work plan and timing for final delivery; 5) Organization's qualification/viability</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.34 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Determination of jurisdictional activity data baseline For unplanned deforestation {J-ADB-UD) Detailed comments</p> <ul style="list-style-type: none"> • Page 4 - Definitions: The definition of forest is unclear. Firstly, footnote 2 states that "... shall qualify as forest for a minimum of 10 years before the project start date". The definition on page 4 currently reads that a forest has to be at least 10 years old at the beginning of the historical reference period - which should be 16 years before project start, contradicting the footnote. This is also how "forest" seems to be referred to in the rest of the document, e.g. on page 13, Step 1 it is stated: "AD Categories and associated LCTs are identified through the comparison of land cover/land use class from the beginning to the end of the Historical Reference Period, taking into consideration that land classified as "forest// must verifiably comply with the definition of "forest// (i.e., meet the thresholds of the definition of 11forest11 for at least the 10 previous consecutive years prior to the date observed.)". We suggest that Verra makes the forest definition consistent throughout the document. |
| Verra Response | J-ADB-UD: The definition of forest has been revised and moved to VM0184. |
| Aster Global Assessment | The assessment team notes the revisions to the definition of forest have resolved this issue. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The definition of forest has been revised and moved to VM0048. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.35 |

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| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Determination of jurisdictional activity data baseline For unplanned deforestation {J-ADB-UD)</p> <p>Detailed comments</p> <ul style="list-style-type: none"> • Page 4 - Definitions: The deforestation definition indicates that 'If the country definition is not in line with VCS, elements of the country definition that do conform with VCS shall be adopted, while other elements shall be modified to conform to VCS.' It is unclear what happens in case the data cannot be reclassified to conform to VCS or if data is not available. And can this result in an FCBM yielding different results than a future FREL that will use the country's definition for deforestation? If so, how should this be reconciled? |
| Verra Response | J-ADB-UD: The definition of deforestation has been removed completely. |
| Aster Global Assessment | The assessment team notes the revisions have removed the definition of deforestation |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | The definition of deforestation has been removed completely. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.36 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Determination of jurisdictional activity data baseline For unplanned deforestation {J-ADB-UD)</p> <p>Detailed comments</p> <ul style="list-style-type: none"> • Page 7 - Applicability conditions: The module is applicable only For jurisdictions that don't have a JNR program or JNR compliant FREL What happens if a jurisdiction later establishes a 'compliant' FREL? Will this overrule the allocation during the JBVP? We would suggest that Verra provides provisions for this scenario to give proponents clarity and certainty during the JBVP. • Page 7 onwards - Trend over the years: we recognize the approach of historical average is chosen. We suggest clarifying why trends (upward/downward) are/aren't allowed. |
| Verra Response | J-ADB-UD: The applicability condition referring to JNR has been removed and reference added to say that whatever information the AUDef sets out that the project should get from Verra it should get from the jurisdictional proponent in a JNR |

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| | jurisdiction. Trends may be added in the future, but for simplicity have not been added to the initial version of this module. |
| Aster Global Assessment | The assessment team believes A3.2 of the module now addresses the question, in addition to Verra's direct response. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | <p>The applicability condition referring to JNR has been removed and reference added to say that whatever information the ADef sets out that the project should get from Verra it should get from the jurisdictional proponent in a JNR jurisdiction.</p> <p>Trends may be added in the future, but for simplicity have not been added to the initial version of this module. It's not the place of the methodology to set out why they are excluded at present.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.37 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Determination of jurisdictional activity data baseline For unplanned deforestation (J-ADB-UD)</p> <p>Detailed comments</p> <ul style="list-style-type: none"> • Page 9 - Geographic boundaries: In some cases, several options for jurisdictional geographic boundaries may be chosen, e.g. cases where a country > 2.5 mill ha and the 2nd level admin > 5 mill ha, a 3rd level admin area may be selected. However, it is also stated that "the national boundary may always be used" and that "Multiple contiguous subnational administrative Jurisdictions of the same level may be combined into a single Jurisdiction" • Who decides which geographic boundary is used for the jurisdictional baseline? Is that Verra or the third-party provider? Does the project developer have a say? This could have a big influence on their baseline, the cost and time needed for data generation. If several options for jurisdictional level/area are available to a project, and specifically in cases where the historical AD for the different jurisdictional levels varies greatly, we suggest that there should be clear rules for the jurisdictional level used. The jurisdictional level that best represents the physical and demographic conditions as well as land use history of the project area should be used. • Project developers should be able to argue for the use of a specific jurisdictional level, and this should be clearly documented with evidence of similarity between their project and the jurisdictional level. Verra should be able to submit a counter argument. Clear rules should stipulate on what grounds the final decision shall be based. |
| Verra Response | J-ADB-UD: Verra decides the jurisdictional boundary and has done so at the highest reasonable level. |
| Aster Global Assessment | <p>The module states "The jurisdictional boundary shall be defined using one of the following cases:</p> <ul style="list-style-type: none"> • The national boundaries may always be used as the jurisdiction. • Where there is a clear expression of government intent to use alternative boundaries in developing jurisdictional REDD programs (e.g., those included in a submission of a |

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| | <p>FREL to the UNFCCC or a submission to the FCPF's Carbon Fund, the BioCF ISFL or to ART/TREES), the boundaries of a government's jurisdictional REDD+ programme may be used. Only in this case may boundaries be defined using biomes, water catchment areas."</p> <p>Verra's response is congruent with the Module but the assessment team believes the comment has brought up an interesting point that should be explained.</p> |
| Aster Global Initial Findings | CL: Please explain why it was decided Verra shall set the jurisdiction without input from stakeholders other than governments. |
| Round 1 Response from Methodology Developer | When Verra decided the jurisdictional boundaries, all registered, listed and identified projects were considered, as well as existing other registries and initiatives (FCPF-CF, ART-Tree, ISFL). Some informal discussions have been initiated with the project proponents and other stakeholders (e.g., World Bank) to define the relevant boundaries. |
| Aster Global Findings Round 2 | The methodology developer has clarified that the jurisdictional boundaries were determined by considering all registered/listed/identified projects and other registry initiatives. Additional internal discussions with project proponents/stakeholders occurred. The assessment team determined this comment has been adequately addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | When Verra decided the jurisdictional boundaries, all registered, listed and identified projects were considered, as well as existing other registries and initiatives (FCPF-CF, ART -TREESree, ISFL). Some informal discussions have been initiated with the project proponents and other stakeholders (e.g., World Bank) to define the relevant boundaries. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.38 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Determination of jurisdictional activity data baseline For unplanned deforestation {J-ADB-UD)</p> <p>Detailed comments</p> <ul style="list-style-type: none"> • Page 12 - Section 5.5.1 Step 1 - Sampling Framer: "locations of irrefutably identified and clearly bounded land cover transitions, such as stable bodies of water, infrequent large scale natural disturbances that caused deforestation, and large-scale infrastructure that caused deforestation, may be spatially delineated and excluded from the Jurisdictional sampling frame. For infrequent large-scale natural disturbances, the exclusion from the sampling frame is required.11 Could you clarify this paragraph - first it says large scale natural disturbances may be excluded from the Jurisdictional sampling frame, and then it says infrequent large-scale natural disturbances have to be excluded. Footnote 6 is missing on the page - does this contain the information needed to distinguish between these 2 cases? |

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| Verra Response | J-ADB-UD: Verra decides the jurisdictional boundary and has done so at the highest reasonable level. Table 11 in Appendix 1 Section A1.4.1 Step 1 now sets out the identified exclusions as optional or mandatory. LiDAR is no longer mentioned in the module. The "coordinated sampling effort" refers to stakeholders (likely project proponents) working together with data service providers (Appendix 1 A 1.4.3). Verra will play no role in coordinating this. Appendix 1 A1.1 sets out the data that will be provided by Verra to the project proponent. |
| Aster Global Assessment | The assessment team concurs with Verra's response revisions to Appendix A should result in clarity, addressing the comment. |
| Response Updated Since Finding Closed? | no R1 Verra response |
| Revised Verra Response October 2023 | This is set out in AUDef A1.4.1 Step 1 Jurisdictional Sampling Frame |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.39 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Determination of jurisdictional activity data baseline For unplanned deforestation {J-ADB-UD)</p> <p>Detailed comments</p> <ul style="list-style-type: none"> • Page 13 - Response design: We expect that the definitions of "forest" and "forest regrowth" (regrowth is classified as such in year 10 of the forest pixels appearing over time) and other LCT will be difficult to map definitively using the sample-based approach. "Evidence of intermediary land cover changes occurring between the Start Date and End Date of the Historical Reference Period should be used to inform the classification of a sample unit(...). For each sample unit where change is observed, the date of change shall be identified and recorded using the timeseries of imagery." This would require substantial manual visual interpretation of almost annual data covering the 6-year HRP, but also for an additional 10 years before the start of the HRP to definitively identify forest, forest loss and regrowth. Practically this will be challenging in many areas where cloud cover and haze make frequent optical data acquisitions hard to find. Additionally, historical VH satellite imagery was not consistently and repetitively acquired everywhere, and may therefore not be readily available for some areas where commercial data providers have not received orders in the past. Furthermore, our experience in Sub-Saharan Africa has shown that areas of dryland open (> 10% canopy cover) forests require consistent comparable HR (<10m) optical data to be able to definitively distinguish sparse forest cover as such. It is hard to identify sparse forest on lower resolution (30 m) images that are available for earlier years. For the identification of "forest" (i.e. forest that has existed for 10 years) in areas where consistent HR optical images through time are not readily available, the sample-based approach may have to be augmented with wall-to-wall mapping using a combination of active and passive medium to high resolution satellite sensors. In such cases the third party provider should clearly map the data and methods used to overcome the technical difficulties. Furthermore, unless it is |

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| | absolutely necessary to map or record the class forest regrowth for the historical AD, we suggest to scrap the requirement for adding a date. |
| Verra Response | J-ADB-UD: Appendix 4 now sets out clearly what supplemental materials stakeholders may provide to data service providers/Verra. The assessment of historical deforestation in Appendix 1 will include VCS projects since in this methodology there are no longer reference regions. Unplanned forest degradation will be taken into account in a supplementary module under VM0184 or - for planned degradation - through complementary IFM methodologies. Requirements for data service providers are set out in the rolling expression of interest (https://verra.org/wp-content/uploads/EOI-Allocation-Data-service-providers.pdf) and periodic requests for proposals (e.g., https://verra.org/wp-content/uploads/2023/04/RFP-Dvpt-of-Jurisdictional-AD-and-FCBMs-for-VCS-AUDef-Projects-17-Apr-2023.pdf). The definition of forest has been revised and moved to VM0184. The definition of deforestation has been removed completely. The applicability condition referring to JNR has been removed and reference added to say that whatever information the AUDef sets out that the project should get from Verra it should get from the jurisdictional proponent in a JNR jurisdiction. Trends may be added in the future, but for simplicity have not been added to the initial version of this module. It's not the place of the methodology to set out why they are excluded at present. Verra decides the jurisdictional boundary and has done so at the highest reasonable level. Table 11 in Appendix 1 Section A1.4.1 Step 1 now sets out the identified exclusions as optional or mandatory. LiDAR is no longer mentioned in the module. The "coordinated sampling effort" refers to stakeholders (likely project proponents) working together with data service providers (Appendix 1 A 1.4.3). Verra will play no role in coordinating this. Appendix 1 A1.1 sets out the data that will be provided by Verra to the project proponent. |
| Aster Global Assessment | The assessment team believes this comment has not been fully addressed |
| Aster Global Initial Findings | CL: Please address comment, in line with finding. |
| Round 1 Response from Methodology Developer | <p>Revised Verra comment addressing original public comment:</p> <ol style="list-style-type: none"> 1) There is no longer a requirement to assess land cover prior to the start of the HRP. 2) Passage in A1.4.1 clarified to "Where evidence exists of intermediary land cover changes occurring between the start date and end date of the HRP, such evidence should be used to inform the classification of a sample unit. Only one result may be identified per location per HRP." The passage suggests that where evidence exists, it should be used. It does not state what form that evidence is, or what years it must come from. There is no longer a requirement to assess land cover prior to the start of the HRP. 3) Verra understands the concerns around data availability. Data availability is expected to improve over time. The module allows a +/- 365 day window on imagery date in relation to the start and end dates of the HRP to allow a wider temporal window for sourcing good images. Verra is also instructing it's DSPs to identify plots where imagery could not be collected, to inform a potential future approach to account for bias introduced by spatially heterogenous data availability. 4)The sample based approach may be supplemented with wall to wall data in the following ways: a) The definition of the sampling strata b) Use of ancillary data to inform plot interpretation. 5) Requirement to record date is related to the collection date of individual images. It is required to appropriately calibrate AD to the effective (as opposed to nominal) sampled period. <p>Explanation of original Verra Response: Verra's original response contained correct information, but did not fully address the issues raised by commenter. Updated response address commenter's issues point by</p> |

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| | point. Response to additional points raised by Aster: N/A |
| Aster Global Findings Round 2 | <p>1). As there is no longer a requirement to assess land cover prior to the start of the HRP, this item can be considered addressed.</p> <p>2). The step, as initially written, would have been more onerous on a project (and thus more conservative). However, the edits made consider the original commenter and attempt to make the process more reasonable. The additional clarification provided is sufficient to close this subrequirement.</p> <p>3). The methodology developer acknowledges the concerns around data availability and has proposed reasonable solutions to address the concerns. The assessment team deems this response sufficient.</p> <p>4) The methodology developer has clarified the use of wall to wall mapping as a supplement, thus addressing this subrequirement.</p> <p>5). The methodology developer has further clarified the need for recording dates of imagery, which the assessment team has deemed appropriate.</p> |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>1) There is no longer a requirement to assess land cover prior to the start of the HRP.</p> <p>2) Passage in AUDef A1.4.1 Response Design clarified to “Where evidence exists of intermediary land cover changes occurring between the start date and end date of the HRP, such evidence should be used to inform the classification of a sample unit. Only one result may be identified per location per HRP.” The passage suggests that where evidence exists, it should be used. It does not state what form that evidence is, or what years it must come from. There is no longer a requirement to assess land cover prior to the start of the HRP.</p> <p>3) Verra understands the concerns around data availability. Data availability is expected to improve over time. The module allows a +/- 365 day window on imagery date in relation to the start and end dates of the HRP to allow a wider temporal window for sourcing good images. Verra is also instructing it’s DSPs to identify plots where imagery could not be collected, to inform a potential future approach to account for bias introduced by spatially heterogenous data availability.</p> <p>4) The sample based approach may be supplemented with wall to wall data in the following ways: a) The definition of the sampling strata b) Use of ancillary data to inform plot interpretation.</p> <p>5) Requirement to record date is related to the collection date of individual images. It is required to appropriately calibrate AD to the effective (as opposed to nominal) sampled period.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.4 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including | Determination of jurisdictional activity data baseline For unplanned deforestation {J-ADB-UD) |

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| general questions & comments | Detailed comments <ul style="list-style-type: none"> Page 14 - Data Sources: It is not clear how LiDAR data can be used for sample data as it is unlikely that comparable LiDAR data will be available for the same locations at the start of the H RP, 6 years prior. Please expand with further guidance. |
| Verra Response | J-ADB-UD: LiDAR is no longer mentioned in the module. |
| Aster Global Assessment | The assessment team has confirmed these revisions have been made. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | LiDAR is no longer mentioned in the module. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.41 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Determination of jurisdictional activity data baseline For unplanned deforestation {J-ADB-UD) Detailed comments <ul style="list-style-type: none"> Page 25 - Development of Jurisdictional Forest Cover Benchmark Maps: The guidance on the creation of the wall-to-wall FCBMs is quite vague and leaves space for different datasets and methods to be used. Although it is required to describe methods in the SOP, requirements on this are also quite vague: "Standard Operating Procedures {SOPs} shall be developed to describe the workflow for mapping. The SOPs should cover, at least, collection of input data, processing and accuracy assessment. The SOPs should include detailed guidance also on quality management. These SOPs shall be included as an appendix in the J-ADB-UD Description Report." We would suggest that there is a clearly defined set of minimum requirements on the statistically sound number of samples used and the resolution and quality of input satellite data used. |
| Verra Response | J-ADB-UD: The "coordinated sampling effort" refers to stakeholders (likely project proponents) working together with data service providers (Appendix 1 A 1.4.3). Verra will play no role in coordinating this. Appendix 1 A1.1 sets out the data that will be provided by Verra to the project proponent. |
| Aster Global Assessment | The module does establish certain requirements for QA and QC. The assessment team acknowledges universal procedural techniques may be ill-advised to apply to all jurisdictions. However the commenter raises valid points regarding universal specifications to ensure quality of input data and data products. |
| Aster Global Initial Findings | CL: Please address comment, in line with finding. |
| Round 1 Response | Step 1, Section A1.4.3 of Appendix 1 provides basic guidance and minimum requirements for the production of FCBM. These FCBM will be produced by the DSP, |

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| from Methodology Developer | as part of their contract, they also have been provided guidance and minimum requirements. |
| Aster Global Findings Round 2 | The methodology developer's revised response includes additional information regarding minimum requirements for the FCBM and the work carried out by the DSP. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | AUDef Step 1, Section A1.4.3 of Appendix 1 provides basic guidance and minimum requirements for the production of FCBM. These FCBM will be produced by the DSP, as part of their contract, they also have been provided guidance and minimum requirements. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.42 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Determination of jurisdictional activity data baseline For unplanned deforestation {J-ADB-UD)</p> <p>Detailed comments</p> <ul style="list-style-type: none"> • Page 25 - Accuracy assessment of the FCBMj: The methodology does not seem to set a requirement for a minimum number of samples to be used for the accuracy assessment of the FCBMj - however this is stated for the FCBMp. We suggest that a rule or clear guidance on the number of field samples to be used for accuracy assessment of the FCBMj is included in the methodology. Secondly, since it is the forest cover that is the most important aspect of the FCBM, we suggest that the minimum accuracy requirement should be related to the User's and producer's accuracy of the Forest class, rather than the minimum overall agreement. |
| Verra Response | <p>J-ADB-UD: Appendix 4 now sets out clearly what supplemental materials stakeholders may provide to data service providers/Verra. The assessment of historical deforestation in Appendix 1 will include VCS projects since in this methodology there are no longer reference regions. Unplanned forest degradation will be taken into account in a supplementary module under VM0184 or - for planned degradation - through complementary IFM methodologies. Requirements for data service providers are set out in the rolling expression of interest (https://verra.org/wp-content/uploads/EOI-Allocation-Data-service-providers.pdf) and periodic requests for proposals (e.g., https://verra.org/wp-content/uploads/2023/04/RFP-Dvpt-of-Jurisdictional-AD-and-FCBMs-for-VCS-AUDef-Projects-17-Apr-2023.pdf). The definition of forest has been revised and moved to VM0184. The definition of deforestation has been removed completely. The applicability condition referring to JNR has been removed and reference added to say that whatever information the AUDef sets out that the project should get from Verra it should get from the jurisdictional proponent in a JNR jurisdiction. Trends may be added in the future, but for simplicity have not been added to the initial version of this module. It's not the place of the methodology to set out why they are excluded at present. Verra decides the jurisdictional boundary and has done so at the highest reasonable level. Table 11 in</p> |

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| | <p>Appendix 1 Section A1.4.1 Step 1 now sets out the identified exclusions as optional or mandatory. LiDAR is no longer mentioned in the module. The "coordinated sampling effort" refers to stakeholders (likely project proponents) working together with data service providers (Appendix 1 A 1.4.3). Verra will play no role in coordinating this. Appendix 1 A1.1 sets out the data that will be provided by Verra to the project proponent.</p> |
| Aster Global Assessment | <p>The module does establish certain requirements for QA and QC. The assessment team acknowledges universal procedural techniques may be ill-advised to apply to all jurisdictions. However the commenter raises valid points regarding universal specifications to ensure quality of input data and data products.</p> |
| Aster Global Initial Findings | <p>CL: Please address comment, in line with finding.</p> |
| Round 1 Response from Methodology Developer | <p>Section A1.4.3 of Appendix 1 defines a minimum number of samples for the FCBMj accuracy assessment: <i>To assess the accuracy of the two main classes (area of deforestation over the HRP and area of forest at end of the HRP), a minimum of 100 sample observations should be made of the target and non-target classes (totaling a minimum of 200 observations per estimate). Observations should be spatially representative of the entire FCBM. A single observation may be used to inform both estimates.</i></p> |
| Aster Global Findings Round 2 | <p>The methodology developer has clarified that a minimum number of samples for the FCBMj is included in Appendix 1, thus addressing the comment.</p> |
| Status | <p>closed R2</p> |
| Response Updated Since Finding Closed? | <p>wording/typo updates</p> |
| Revised Verra Response October 2023 | <p>AUDef Section A1.4.3 of Appendix 1 defines a minimum number of samples for the FCBMj accuracy assessment: "To assess the accuracy of the two main classes (area of deforestation over the HRP and area of forest at end of the HRP), a minimum of 100 sample observations should be made of the target and non-target classes (totaling a minimum of 200 observations per estimate). Observations should be spatially representative of the entire FCBM. A single observation may be used to inform both estimates."</p> |
| Aster Global Assessment of Revised Response | <p>The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required.</p> |
| Comment # | <p>378.43</p> |
| Question | <p>General</p> |
| Section | <p>N/A</p> |
| Reviewer Organization | <p>Shell</p> |
| Reviewer Country | <p>Not indicated</p> |
| Response(s) - including general questions & comments | <p>Determination of jurisdictional activity data baseline For unplanned deforestation {J-ADB-JD) Detailed comments <ul style="list-style-type: none"> • Page 26 - Accuracy assessment of the FCBMj: The minimum number of samples to be used for assessing the accuracy of the FCBMp is specified as 300. We believe this requirement should be proportional to the size of the project rather than a fixed number. We suggest that a rule or clear guidance on the number of field samples to be used for the accuracy assessment of the FCBMp is included in the methodology. • Page 26 - 5.5.3 Step 1: "A coordinated sampling effort may be designed to both </p> |

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| | <p>support AD development and accuracy assessment of FCBMp." Could you clarify whether you mean coordination between the project and the third party who created the FCBMj? Although this would make best use of the existing data at both parties, is this realistic on a practical level? Who will pay for the third party's time? Who will coordinate these efforts?</p> |
| Verra Response | <p>J-ADB-UD: The "coordinated sampling effort" refers to stakeholders (likely project proponents) working together with data service providers (Appendix 1 A 1.4.3). Verra will play no role in coordinating this. Appendix 1 A1.1 sets out the data that will be provided by Verra to the project proponent.</p> |
| Aster Global Assessment | <p>It is equally difficult for the assessment team to interpret who the actors are involved in a "coordinated sampling effort".</p> |
| Aster Global Initial Findings | <p>CL: Please revise this passage accordingly.</p> |
| Round 1 Response from Methodology Developer | <p>Accuracy assessment of the jurisdictional FCBM (FCBMj) is the sole responsibility of the DSP. If projects have available FCBM (FCBMp) the DSP may integrate these FCBMp in the jurisdictional one, as per A1.4.3. This will be done upfront (i.e., before AD baseline allocation) by the DSP and won't require the VVB assessment when projects are audited.</p> |
| Aster Global Findings Round 2 | <p>The methodology developer has clarified the project proponents may submit FCBMps for incorporation in the jurisdictional FCBM. However, the confusing language of "coordinated sampling effort" is still included. When read, it is unclear who may conduct this effort, which could lead readers to believe it is indicating Verra may conduct the effort.</p> |
| Round 2 NCR/CL/OFI2 | <p>CL: Please revise the passage accordingly.</p> |
| Round 2 Response from Methodology Developer | <p>Updated Verra response to original comment: 1) Accuracy assessment of the jurisdictional FCBM (FCBMj) is the sole responsibility of the DSP. If projects have available FCBM (FCBMp) the DSP may integrate these FCBMp in the jurisdictional one, as per A1.4.3. This will be done upfront (i.e., before AD baseline allocation) by the DSP and won't require the VVB assessment when projects are audited. 2) The passage (included in an earlier draft of <i>AUDef</i> as in A1.4.3) related to coordinated sampling design has been removed, as it is confusing and does not describe any requirement.</p> <p>Note to Aster: point 2) added since R1 responses from developer</p> |
| Aster Global Findings Round 3 | <p>The stricken statement avoids confusion on the role of the DSP and opportunity for projects to submit FCBMp for consideration. Closed.</p> |
| Status | <p>closed R3</p> |
| Response Updated Since Finding Closed? | <p>wording/typo updates</p> |
| Revised Verra Response October 2023 | <p>1) Accuracy assessment of the jurisdictional FCBM (FCBMj) is the sole responsibility of the DSP. If projects have available FCBM (FCBMp) the DSP may integrate these FCBMp in the jurisdictional one, as per AUDef A1.4.3. This will be done upfront (i.e., before AD baseline allocation) by the DSP and won't require the VVB assessment when projects are audited. 2) The passage (included in an earlier draft of <i>AUDef</i> as in A1.4.3) related to coordinated sampling design has been removed, as it is confusing and does not describe any requirement.</p> |

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| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.44 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Determination of jurisdictional activity data baseline For unplanned deforestation {J-ADB-UD) Detailed comments • Page 27 - Delivery of data to project proponents: Do we interpret this section correctly, i.e. that project developers will be provided with the Jurisdictional FCBMs and the jurisdictional risk map for the entire jurisdiction? Will this be publicly accessible data or only delivered to the project developer who has paid for this service (or some other form of subscription?) |
| Verra Response | J-ADB-UD: Appendix 1 A1.1 sets out the data that will be provided by Verra to the project proponent. |
| Aster Global Assessment | The assessment team concurs that revisions made to the module, in A1.1 specifically, will answer the commenter's questions. |
| Response Updated Since Finding Closed? | no R1 Verra response |
| Revised Verra Response October 2023 | Project proponents will be provided with the activity data for their project area and leakage belt. Jurisdictional FCBMs and the jurisdictional risk map for the entire jurisdiction will available on the Verra website. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.45 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Determination of jurisdictional activity data baseline For unplanned deforestation {J-ADB-UD) Typos/corrections: • Page 9: "The boundaries of a Jurisdiction must not spatially overlap with any other Jurisdiction for which valid Jurisdictional activity data baseline exists or with any registered JNR Jurisdictional FREL or program ..." Remove the word "module" • Page 27: PA should be LB ADPALCT,pJ, Portion of the Jurisdictional Activity Data Baseline allocated to AUD Leakage Belt of project p, in Land Cover Transition class LCT, in risk class i, ha |
| Verra Response | J-ADB-UD: Appendix 4 now sets out clearly what supplemental materials stakeholders may provide to data service providers/Verra. The assessment of historical deforestation in Appendix 1 will include VCS projects since in this methodology there |

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| | <p>are no longer reference regions. Unplanned forest degradation will be taken into account in a supplementary module under VM0184 or - for planned degradation - through complementary IFM methodologies. Requirements for data service providers are set out in the rolling expression of interest (https://verra.org/wp-content/uploads/EOI-Allocation-Data-service-providers.pdf) and periodic requests for proposals (e.g., https://verra.org/wp-content/uploads/2023/04/RFP-Dvpt-of-Jurisdictional-AD-and-FCBMs-for-VCS-AUDef-Projects-17-Apr-2023.pdf). The definition of forest has been revised and moved to VM0184. The definition of deforestation has been removed completely. The applicability condition referring to JNR has been removed and reference added to say that whatever information the AUDef sets out that the project should get from Verra it should get from the jurisdictional proponent in a JNR jurisdiction. Trends may be added in the future, but for simplicity have not been added to the initial version of this module. It's not the place of the methodology to set out why they are excluded at present. Verra decides the jurisdictional boundary and has done so at the highest reasonable level. Table 11 in Appendix 1 Section A1.4.1 Step 1 now sets out the identified exclusions as optional or mandatory. LiDAR is no longer mentioned in the module. The "coordinated sampling effort" refers to stakeholders (likely project proponents) working together with data service providers (Appendix 1 A 1.4.3). Verra will play no role in coordinating this. Appendix 1 A1.1 sets out the data that will be provided by Verra to the project proponent.</p> |
| Aster Global Assessment | <p>1. Typo no longer exists. 2. Revisions have nullified this.</p> |
| Response Updated Since Finding Closed? | no R1 Verra response |
| Revised Verra Response October 2023 | This word has been removed |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.46 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Methods for monitoring greenhouse gas emissions within the project boundary and leakage belt from unplanned deforestation (MON-AUD)</p> <ul style="list-style-type: none"> • General comment: Not all acronyms introduced in the text are defined in the appropriate section (i.e., BL-UD) |
| Verra Response | MON-AUD: Acronym confusion should be cleared up by the module consolidation. Confusion around discount factors has also now been resolved. The 1/20 decay rate for wood products and soils is justified in Section 3.6.4 of the VCS Methodology Requirements. |
| Aster Global Assessment | Assessment team concurs acronym use is reduced due to revisions. |
| Response Updated | no R1 Verra response |

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| Since Finding Closed? | |
| Revised Verra Response October 2023 | This typo has been addressed |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.47 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Methods for monitoring greenhouse gas emissions within the project boundary and leakage from unplanned deforestation belt (MON-AUD)</p> <ul style="list-style-type: none"> • Page 4 - Development of land cover transition data: This section introduces a discount factor DFDef-Pa however, it is not clear how this factor is calculated. We believe that this is the same discount factor as DFDeiin the J-ADB-UD module. If so, could Verra align the abbreviations used and link to the J-ADB-UD module for the calculation. |
| Verra Response | MON-AUD: Acronym confusion should be cleared up by the module consolidation. Confusion around discount factors has also now been resolved. The 1/20 decay rate for wood products and soils is justified in Section 3.6.4 of the VCS Methodology Requirements. |
| Aster Global Assessment | Comment is not directly addressed. |
| Aster Global Initial Findings | CL: Please address comment, in line with finding. |
| Round 1 Response from Methodology Developer | There is no such discount factor in the new version of the meth. The only discount factor is related to uncertainty and clarified in Section 5.3.1 of the meth. |
| Aster Global Findings Round 2 | The assessment team confirms that the only discount factor included in the module pertains to uncertainty. As the discount factor the commenter was referencing has been removed, this item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | There is no such discount factor in the new version of the meth. The only discount factor is related to uncertainty and clarified in AUDef Section 5.3.12 of the meth. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |

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| Comment # | 378.48 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Methods for monitoring greenhouse gas emissions within the project boundary and leakage belt from unplanned deforestation (MON-AUD)</p> <p>• Page 7 - Estimation of the annual emissions from carbon stock changes: This section states that "emissions from non-wetland soil and wood products are assumed to take place gradually over time at an annual rate of 1/20 of the stock change. However, it is unclear how this rate was established (e.g. best practice, or sourced from a reputable source).</p> |
| Verra Response | MON-AUD: Acronym confusion should be cleared up by the module consolidation. Confusion around discount factors has also now been resolved. The 1/20 decay rate for wood products and soils is justified in Section 3.6.4 of the VCS Methodology Requirements. |
| Aster Global Assessment | The pattern of carbon loss in the VCS Methodology Requirements depends on the longevity of wood products. |
| Aster Global Initial Findings | CL: Please clarify how the decay rate for wood products aligns with 3.6.4 of the VCS Methodology Requirements. |
| Round 1 Response from Methodology Developer | For both soil and HWP the updated version of the module takes "decay" rates from the Methodology Requirements. These can be seen in current equations 18 and 19 for the baseline and 34 and 35 for the monitoring period. |
| Aster Global Findings Round 2 | The assessment team confirms that the decay rates for wood products now aligns with the VCS Methodology requirements. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | For both soil and HWP the updated version of the module takes "decay" rates from the <i>Methodology Requirements</i> . These can be seen in AUDef current equations 18 and 19 for the baseline and 34 and 35 for the monitoring period. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.49 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general | <p>Conclusion</p> <p>We commend Verra for suggesting solutions and consulting with stakeholders on its new modules for avoided unplanned deforestation projects. It is evident that the</p> |

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| questions & comments | modules set out to tighten current environmental integrity requirements while aligning with jurisdictional accounting. The allocation of the activity data and the proposals around risk mapping are examples of this. |
| Aster Global Assessment | No response required. |
| Status | closed R1 |
| Response Updated Since Finding Closed? | no |
| Revised Verra Response October 2023 | N/A |
| Aster Global Assessment of Revised Response | The assessment team confirmed that no changes were made to the initial response. No further review is required. |
| Comment # | 378.5 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | Conclusion However, we are concerned that some of the new requirements will put undue burden on project proponents. For example, it is currently unclear who will bear the costs of paying the external service providers. If this falls on project developers, some might struggle to meet this cost, in particular if they are based in large jurisdictions, which could make this significantly more expensive. Furthermore, some of the data requirements set out in the J-ADB-UD module would be difficult ii not impossible to achieve in some parts of the world, leaving project developers active in those regions at a distinct disadvantage. |
| Aster Global Assessment | Comment suggests fees will scale with jurisdiction size. The assessment team is not aware of how fees are structured. Comment expresses concern about feasibility of data requirements |
| Aster Global Initial Findings | CL: Please address comment, in line with finding. |
| Round 1 Response from Methodology Developer | Revised Verra comment addressing original public comment: Fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects. We expect projects will be able to meet Verra's data requirements without undue burden. However, if projects have concerns we will address them on a case-by-case basis. |
| Aster Global Findings Round 2 | The methodology developer has revised their response to indicate that fee structures are not to be sure at this point, but that they are working to ensure that costs are dispersed, addressing this portion of the comment. The commenter also requested clarification regarding the feasibility of data requirements. The methodology developer has provided an option to work with projects on a cases by case basis if projects are unable to meet Verra's data requirements. This item is addressed. |
| Status | closed R2 |

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| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>Fee structure is yet to be determined. Verra is sensitive to financial considerations of projects and will work to ensure that costs are dispersed equitably per jurisdiction and in a way that does not burden projects.</p> <p>We expect projects will be able to meet Verra's data requirements without undue burden. However, if projects have concerns we will address them on a case-by-case basis.</p> |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |
| Comment # | 378.51 |
| Question | General |
| Section | N/A |
| Reviewer Organization | Shell |
| Reviewer Country | Not indicated |
| Response(s) - including general questions & comments | <p>Conclusion</p> <p>Finally, as laid out in the General Comments at the beginning of the document, we would strongly encourage Verra to edit all the documents for clarity of language, to make them as easily accessible as possible.</p> |
| Aster Global Assessment | Comment asks for additional clarity. |
| Aster Global Initial Findings | OFI: Please consider detailed proofreading for readability and clarity. |
| Round 1 Response from Methodology Developer | A technical editor reviewed VM0184 and the AUDef module. Further clarity has been provided by merging all modules into a unique AUDef one. The core text of the methodology and module only include the processes and requirements to be followed by the projects. All processes and requirements that must be applied by the DSP are now in separate appendixes. Appendix 3 has been added to clarify how the interventions of different stakeholders will be organized, how baseline AD will be allocated to projects and how it impacts the VCS registration and verification process. |
| Aster Global Findings Round 2 | The assessment team notes that the methodology developer has opted to respond to the OFI, and indicates the steps taken to improve the methodology/module for readability and clarity. As no response to the OFI was required, this item is addressed. |
| Status | closed R2 |
| Response Updated Since Finding Closed? | wording/typo updates |
| Revised Verra Response October 2023 | <p>A technical editor reviewed VM0048 and the AUDef module.</p> <p>Further clarity has been provided by merging all modules into a unique AUDef module one. The core text of the methodology and module only include the processes and requirements to be followed by the projects.</p> <p>All processes and requirements that must be applied by the DSP are now in separate AUDef appendixes. Appendix 3 has been added to clarify how the interventions of</p> |

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| | different stakeholders will be organized, how baseline AD will be allocated to projects and how it impacts the VCS registration and verification process. |
| Aster Global Assessment of Revised Response | The assessment team confirmed that the revised response includes only minor revisions that do not substantially impact the initial response. No further review is required. |