

VERRA REVIEW FINDINGS REPORT

This report includes the findings identified during Verra’s review of the Southern Cardamom REDD+ Project. The review was conducted in accordance with Section 6 of the *VCS Registration and Issuance Process*, Section 4.7 of the *CCB Program Rules*, and Section 3.11 of the *SD VSta Program Guide*. The validation/verification body (VVB) must address the findings raised in this report.

Specifically, the VVB must:

1. Address the findings and provide responses for Verra’s review.
2. Attach supporting documentation as needed.

Note that confidential information may be provided as separate attachments and should be clearly designated as “confidential”.

After the findings have been addressed, Verra may raise nonconformities with the VVB. The VVB must investigate the root cause of each nonconformity and document the corrective action(s) taken to prevent the nonconformity from reoccurring.

This report may be shared with the relevant accreditation body.

VVB	AENOR INTERNACIONAL S.A.U
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Accreditation Body	United Nations Climate Change (UNFCC)
Project and Relevant Assessment(s)	1748 – The Southern Cardamom REDD+ Project VCS and CCBS verification report issued on 28 December 2022 (VCS/CCB monitoring period of 01 January 2021 – 31 December 2021) SD VSta verification report issued on 27 January 2023 (SD VSta monitoring period of (01 January 2021 – 31 December 2021)
Verra Program(s)	Verified Carbon Standard (VCS) Program Climate, Community & Biodiversity Standards (CCBS) Program Sustainable Development Verified Impact Standard (SD VSta) Program
References	VCS Standard, v4.3 VCS Program Guide, v4.2 Climate, Community & Biodiversity Standards, v3.0 CCB Program Rules, v3.1

	<i>Sustainable Development Verified Impact Standard, v1.0</i> <i>SD VISta Program Guide, v1.0</i> ISO 14064-3:2006 ISO 14065:2013
Date of First Issue	1 March 2024
Date of Second Issue	19 July 2024
Review Conclusion	The review is closed. Verra reviewed the responses provided by AENOR. To further investigate the allegations, Verra requested responses from Wildlife Alliance (WA) in a separate report. WA was required to take actions to mitigate the risk of future harm and continually improve the project. All reports associated with Verra’s review are publicly available on the Verra Registry.
Date of Final Issue	10 September 2024

FINDINGS

Finding 1 – Violation of Property Rights

Issues

1. In a report sent to Verra, and consistent with their February 2024 public report, Human Rights Watch (HRW) alleged that one instance of forced eviction in the project zone occurred during the monitoring period (see “Background” section below).

Action Required

1. The VVB must clarify whether they encountered evidence of involuntary relocations or other violations of property rights during the audit.
2. The VVB must assess whether they can conclude with a reasonable level of assurance that the testimonies of stakeholders regarding their opinions of and interactions with project personnel during the on-site audit were given without influence or coercion from the project proponent.
3. The VVB must assess whether these allegations impact the level of assurance reached during the verification audit, particularly concerning land rights and stakeholder consent.

Background

HRW alleges that several forced evictions took place, including one in March 2021 (during the monitoring period covered by this report) in communes in the project zone. HRW’s [February 2024 report](#) contains additional details about the nature of the forced evictions.

Program Rule(s)

Climate, Community & Biodiversity Standards, v3.0, Section G5.2

Sustainable Development Verified Impact Standard, v1.0, Section 2.4.2 & 2.4.3

VCS Standard, v4.3, Section 3.17.16 (1)

VVB Response

1. The VVB must clarify whether they encountered evidence of involuntary relocations or other violations of property rights during the audit.

AENOR confirms that it had no evidence to support that there were involuntary relocations or other violations of property rights during the audit. Points 2 and 3 below indicate the evidence analyzed on which this conclusion is based.

2. The VVB must assess whether they can conclude with a reasonable level of assurance that the testimonies of stakeholders regarding their opinions of and interactions with project personnel during the on-site audit were given without influence or coercion from the project proponent.

The measures considered by AENOR to collect evidence from stakeholders without influence or coercion from the PP were the following:

A- The meetings between AENOR and the communities were held in an open and collective call in the communities selected by AENOR. Since it is necessary to call meetings before the audit, the PP physically placed notices in meeting centers and local roads announcing the date, time and reason for the meeting, as observed during the visit (posters) and confirmed with attendees. It is important to note that there are no alternatives for convening stakeholders, so AENOR depended on WA's collaboration at this point.

B- The meetings were carried out exclusively between the audit team in the field (Carlos Jiménez as Lead Auditor; Lakhena Chan as Local Expert and Translator) and the interested parties (communities chosen by the VVB), that is, no person from the Government (PP), Wildlife Alliance (WA), or Wildlife Works Carbon (WWC) was authorized to participate in the meetings with the communities. This was confirmed by AENOR at the beginning of each meeting with the interested parties, as well as the confidentiality of the information provided and free attendance at the meeting. In order not to condition freedom of expression or cause suspicion, no specific data was taken about the attendees (name, signature, etc.), only the characterization of the type of group and its general composition (community, gender, age, religion, relation with the Project). Likewise, after the meetings, no information or opinion collected in the meetings was provided by AENOR to the PP, WA or WWC. Last, note that the same local expert, who is independent, had also worked on the previous verification (carried out by the VVB Aster Global Environmental Solutions, Inc.) so her local expertise was available (sampling rationales, topics and groups of interest, etc.).

C- For those who were not present at the meetings with the VVB, the call posters, distributed by WA (by request of the VVB), contained the contact information of the audit team (email, local telephone number and location of the team on the days of the audit), which was also offered to those attending

meetings in case they required adding more information or more confidentiality. No additional information was obtained by this means.

D- The interviews were carried out in the local language by the local female expert, under the supervision of the team leader, under a script of questions based on the Verra normative documents and project documentation (current and previous), adapted for local understanding. The same meeting spaces/schools/temples (not in WA facilities) used for other community meetings were used for these ones. Time for the meeting, when possible, was arranged out of the common labor/pray hours. Therefore, it is assumed that the meetings were carried out in a culturally appropriate manner.

That said, AENOR concludes with a reasonable level of assurance that the testimonies of stakeholders regarding their opinions of and interactions with project personnel during the on-site audit were given to the VVB without influence or coercion from the project proponent.

3. The VVB must assess whether these allegations impact the level of assurance reached during the verification audit, particularly concerning land rights and stakeholder consent.

The measures considered by AENOR to collect onsite evidence to ensure a reasonable level of assurance during the verification audit, particularly concerning land rights and stakeholder consent, were the following:

A- The audit was extensive in its geographical scope and number of people consulted:

As indicated in the Verification Report, within the project area there are no people living or communities, all of them are on the periphery (a total of 29, of which 21 are priority and permanent participants and 8 receive punctual support from the project – due to their greater distance or better socioeconomic condition). Of the 29 communities in the area of influence of the project, 8 were consulted (28%) during the field visit by the AENOR team, in collective events where a total of 184 people (heads of families) participated, with representation from various ethnic groups, religions, geographical sectors of the project and a 40-60% balance between men/women. The visit area (project sector) and communities were selected by AENOR, not by WA. Other specific considerations regarding community consultation are included in Action required 2 above. Additionally, 3 groups of Cardamoms Forest Protection Program Rangers were interviewed (assigned to different Patrol Stations).

B- The audit was based on a sampling and a risk-based approach, considering the best information available at that time:

On 9th June 2022, Christopher Chapman (Manager, CCB & SD ViSta Programs) notified AENOR that allegations of human rights violations related to the Project were reported and a call was held related to how to approach this fact under the audit visit (16th-24th June 2022; 9 days x audit team member). Accessible information regarding the case was limited to researcher Tim Frewer's Twitter feed, which had reached both Verra and Carbon Pulse. AENOR contacted both Tim Frewer and Carbon Pulse by email before the field visit, however no response was obtained. On the other hand, in the two public comments periods (CCB and SDViSta) no comments were received in this regard or of any other kind, after the field visit and review of the documentation, these facts were communicated

to Verra (Christopher Chapman) on 10th November 2022; and no further action was required. Finally, the audit took place for months (from the beginning of the first public comment period on 7th Jun 2022), until the verification reports from VCS/CCB and SDVista were closed on 28th December 2022 and 27th January 2023 respectively, without having been received at any time communications by HRW (who had already initiated communications with WA, WWC and MoE on 27-28 September 2022), which has also not happened so far (even when communications with the previous VVB began on 12th April 2023).

Therefore, despite AENOR's specific efforts aimed at detecting these facts for the audit and particularly for the field visit (both in communications with claimants, public comment periods and in the field visit), there was no way to find an specific clue about the alleged cases of forced evictions (particularly the one in March 2021, during the monitoring period, in O'Som commune) in order guide the field visit, given that their occurrence and location (if any) were unknown, neither during the 8 months that the process of the verification lasted.

That said, according to the results of the information collected and the measures above explained, AENOR confirms, with a reasonable level of assurance, that the conclusions reached concerning land rights and stakeholder consent at the time of its emission and for the monitoring period are not undermined by the allegations by HWR, since no evidence of involuntary relocations or other violations of property rights were found during the audit.

Verra Response

Verra acknowledges AENOR's response regarding the alleged violations of property rights. However, this finding cannot be closed.

AENOR cites "specific efforts aimed at detecting these facts for the audit and particularly for the field visit" but does not clearly describe what specific actions (e.g., changes to the audit plan; interviews with WA, local communities, and other stakeholders; other evidence gathering activities) it took to investigate the allegations. AENOR must further describe these actions.

VVB Response

No changes were made to the VCS/CCB/SDV verification audit. As mentioned above, the notification by Verra to AENOR was on 9th June 2022, subsequently a call was held, and the field visit was planned for 16th-24th June 2022.

¿ Why was the verification plan not changed then?

1- There was no reliable information, only a Twitter thread by researcher Tim Frewer's Twitter which had reached both Verra and Carbon Pulse. There was no certainty about who the subjects were, specific places, motives, what the credibility of the complainant was or if the people in the images really had a relationship with the project. Considering such vague information, modifying an audit that is already logistically complex due to an unverifiable rumor on twitter is not reasonable, in fact, it would be the paradox of an audit: if it is necessary to certify a truth through various reliable sources of different nature, basing a planned program on a single rumor does not seem reasonable.

2- As the field audit plan was not going to be modified, the usual audit procedures were maintained anyway considering that the sample was already remarkably large (Point 3A above) and that the procedures relating

to confidentiality, anonymity, freedom of expression, etc. were meticulous (points 2A, 2B, 2C above) as usual. Had any clue to these facts been obtained through these procedures, additional actions could have been taken during and after the visit, however, in the absence of clues, there was no basis for changes.

3-Therefore, before the visit there was no information and during the visit, there was no information regarding the aforementioned case either. What happened then after the visit? That no other evidence was found either:

- AENOR contacted both Tim Frewer and Carbon Pulse by email before the field visit, however no response was obtained. They could have contacted them later after the visit (the audit took 7 months to be closed after the visit) and AENOR would have tried to gather information by other means, however, despite a direct email to them, there was no response.
- There were two public comments periods (CCB and SDVista) where no comments were received in this regard or of any other kind, although it would have been an opportunity for any of the complainants with internet access (the researcher, Carbon Pulse, HRW, etc.) to have posted comments. This is also paradoxical, because HRW had already initiated communications with WA, WWC and MoE on 27-28 September 2022, when the AENOR audit was still open. Why would HRW not communicate with AENOR precisely when it was already investigating and the audit was open?
- After reporting these findings to Verra (Christopher Chapman) on 10th November 2022 no further action was required by Verra to AENOR. That is, Verra, with the same information, would have reached the same conclusion: we found no clues that would make us take decisions different from those taken and, therefore, with the same information AENOR and Verra, the audit continued its course: report, PRR, closure of the audit.

That said, regarding the second question, the specific actions taken regarding the allegation (reminder: 1 tweet with no specific information) that would not have taken place in the absence of the allegation were:

- 1- Contacting the complainant and Verra to provide information if available. No additional information.
- 2- Including questions regarding the allegation in the interviewed communities (broad spectrum, see 3A above), to the patrol units and to WA. No additional information.
- *- The measures described in 2A, 2B, 2C, 2D and 3A were applied as usual.

In conclusion, AENOR maintains that reasonable decisions were taken based on the best information available and that, as long as the audit lasted, there were no clues to have taken other actions in a justified manner.

Verra Response

Verra acknowledges the clarification from AENOR regarding its assessment of the alleged violations of property rights.

Verra received additional responses and commitments from WA in a separate report. This finding is closed.

Finding 2 – Option to Withhold Consent

Issues

1. It is unclear how the FPIC meetings described in Sections 2.3.3 and 2.3.7 of the CCB/VCS monitoring report and Section 2.2.1 of the SD VSta monitoring report allowed stakeholders to give, withhold, or withdraw their consent.
2. Section 4.3.12 of the CCB/VCS verification report does not adequately describe the VVB's assessment and conclusions regarding stakeholders' ability to withhold consent and whether stakeholders had an appropriate channel to do so.
3. Section 4.3.12 of the CCB/VCS verification report states "There are instances of community members and outsiders clearing land they know they do not own, in order to try and claim it. However, these disputes are new and the legal right to the land is clear. The project is protecting the rights of stakeholders." These incidents existed in the previous monitoring period (reference Section 4.3.12 of the *CCB/VCS Verification Report* issued by Aster Global on 11 May 2021). It is unclear how the VVB has deemed these incidents "new" and how they have verified that the actions taken by the project to resolve any disputes that arose from these incidents are sufficient.

Action Required

1. The VVB must describe the full process carried out by the project proponent to maintain FPIC throughout the monitoring period and clarify whether the following requirements were met:
 - a) Stakeholders had the opportunity to evaluate impacts, raise concerns about potential or realized negative impacts, and provide input on the activities implemented during the monitoring period. (*CCB Standards*, v3.0, Sections G3.4 and G5.2; *VCS Standard*, v4.3, Section 3.17.4, *Sustainable Development Verified Impact Standard*, v1.0, Section 2.2.8)
 - b) The inputs received during the local stakeholder consultations and meetings were considered, and in case they were not, that there is a justification as to why the inputs were not appropriate. (*CCB Standards*, v3.0, Section G5.2; *VCS Standard*, v4.3, Section 3.17.5, *Sustainable Development Verified Impacts Standard*, v1.0, Section 2.2.7)
 - c) All relevant stakeholders gave their unconditional and free consent for all project activities to commence and continue throughout the monitoring period. (*CCB Standards*, v3.0, Section G5.2, *Sustainable Development Verified Impacts Standard*, v1.0, Section 2.4.3, *VCS Standard*, v4.3, Section 3.17.16(1))
 - d) Consent was free of coercion, intimidation, manipulation, threat, or bribery. (*CCB Standards*, v3.0, Section G5.2, *Sustainable Development Verified Impacts Standard*, v1.0, Box 4)
2. The VVB must explain how it verified that the "FPIC meetings" were conducted in a timely and culturally appropriate manner, including language and gender sensitivity, and in a neutral and accessible setting.
3. The VVB must describe how it assessed and concluded that the FPIC process included the ability to withhold and/or give consent for any and all project activities.
4. The VVB must describe how it determined when the incidents referenced in Section 4.3.12 of the CCB/VCS verification report occurred and how it assessed that the project handled any resulting

disputes properly.

Program Rule(s)

Climate, Community & Biodiversity Standards, v3.0, Sections G3.4 and G5.2

Sustainable Development Verified Impacts Standard, v1.0, Sections 2.2.8, 2.2.7, and 2.4.3

VCS Standard, v4.3, Sections 3.17.4, 3.17.5, 3.17.16(1) and 3.17.19

VVB Response

1. The VVB must describe the full process carried out by the project proponent to maintain FPIC throughout the monitoring period and clarify whether the following requirements were met:

a) Stakeholders had the opportunity to evaluate impacts, raise concerns about potential or realized negative impacts, and provide input on the activities implemented during the monitoring period. (CCB Standards, v3.0, Sections G3.4 and G5.2; VCS Standard, v4.3, Section 3.17.4, Sustainable Development Verified Impact Standard, v1.0, Section 2.2.8)

As stated in the PD (2.1.8), the project had conducted FPIC activities through Social Impact Assessment (SIA) workshops in each of the villages within the project area. The SIA training and workshop utilized the theory of change logic to hypothesize how the Project intends to achieve its objectives. Through the SIA training and workshop the PP, local government officials and key community leaders created a roadmap of how the SCRPP planned to get from Point A (project activities) to Point Z (project impacts). First, the participants created a project vision statement. They then identified and prioritized the Project's focal issues, from which they created a problem statement and vision statement for each focal issue. With these problem and vision statements they created a problem flow and results chain diagram for each focal issue. Next the participants conducted a risk analysis and negative impact assessment for each focal issue, and finally a theory of change statement. Once these items were created for each issue, a list of mitigating activities and indicators were created for the life of the Project. Thus, community members, as project stakeholders, were involved in each step of the Project's design process.

SBIA workshops were held from August 15-17 and August 23-25, 2017 at the MoE (PP) district office in Koh Kong. A total number of 73 local government staff and local decision makers from the SCRPP attended. During this workshop, discussion focused on the agents and drivers of deforestation, as well as on the community and community groups. Through the expert knowledge provided by the local government officers and decision makers in these discussions, a comprehensive list of the categories of people expected to be affected by the Project were identified.

The previous information corresponds to the development of the FPIC itself, which was carried out in 2017 and is not part of the scope of this verification audit (01 Jan 2021 - 31 Dec 2021), but of the validation of the PD. That said, it is also important to note that Verra's regulatory documents (VCS, CCB, SD VSta) do not require the PP that the FPIC (according to the formal definition and procedures of FPIC) is periodically repeated, although it is required that consultations are carried out periodically. Therefore, when FPIC meetings (as called by the PP) were held during the current monitoring period, the previous procedure was not followed (since it is not appropriate), but that of a follow-up consultation according to the requests of Verra standards. Thus, during this monitoring period (M3 for VCS/CCB, MR2 for SD VSta) stakeholder consultations continued with public meetings, previously announced, held throughout the project

communities. Meetings were conducted by appointed FPIC officers, and were called at public locations, such as village public buildings and schools. During this monitoring period, 63 community meetings were conducted with all the 29 beneficiary communities. The meetings were held in two rounds, with the first taking place between January 30, 2021 – February 10, 2021, and the second between November 20, 2021 to February 28, 2022. Note that, although the consultations corresponded to 2021 and should have been carried out at the end of 2021, their scheduling was delayed due to the COVID19 pandemic, which is why, even if they had been carried out outside the monitoring period, they are included within the scope of the verification audit.

The agenda for the FPIC meeting includes:

- An Introduction to Climate Change
- Introduction to REDD+
- A summary of the Southern Cardamom REDD+ project
- Benefits from the REDD+ Project
- Feedback and Grievance Redress Mechanism
- Q&A session (where participants could raise concerns and provide inputs regarding the project with the project officers)
- Participants will be asked to raise their hands to show their consent to continue to support the REDD+ Project. If participants do not support the project, they just simply not show their hands
- Other information.

That said, AENOR considers that communities had the opportunity to evaluate impacts, raise concerns about potential or realized negative impacts, and provide input on the activities implemented during the monitoring period through these annual consultations. This was verified by AENOR through (as indicated in the verification report, evidence D15 and interview I14-I21) the procedures for consultation and the minutes of the meetings (reviewed in hard copy in the WA office for the 8 communities visited), cross-checked with the testimonies obtained in the audit interviews (described in Findings 1 and 6). The conclusions regarding the evaluation are those indicated in sections 4.3.4, 4.3.5, 4.3.6, 4.3.8 and 4.3.12 of the verification report.

b) The inputs received during the local stakeholder consultations and meetings were considered, and in case they were not, that there is a justification as to why the inputs were not appropriate. (CCB Standards, v3.0, Section G5.2; VCS Standard, v4.3, Section 3.17.5, Sustainable Development Verified Impacts Standard, v1.0, Section 2.2.7)

Regarding the procedure, if concerns or questions were raised during the “FPIC meetings” (as follow up consultations), the project officer would note them down and sometimes provide verbal responses or clarifications directly. If concerns or questions involved technical or significant input, the concerns or questions would be recorded and redressed using the Feedback and Grievance Redress Mechanism in place.

As reported in verification report, one example of how project design has been affected by stakeholder input is the road project implemented in Pur Beung Chhay Reab (shortened to Pur Beung), which was visited during the field inspection. WA conducted a socio-economic survey and discussed infrastructure plans with the Pur Beung village chief and Commune Council. They found that the most urgent need to improve livelihoods was the completion of the road from Pur Beung Village to Sre Ambel Town and the 26 concrete

culverts to enable villagers to bring their agriculture products to Sre Ambel Market. In addition, a bridge across the river to Pur Beung Village, a secondary school and health center were identified as essential infrastructure needed by the community. WA also found that the road, bridge, school and health center are for the public benefit and was part of Dong Peng commune development plan before the financial support was disbursed. Construction of the bridge, secondary school and health centre will be implemented in future monitoring periods.

That said, AENOR considers that the inputs received during the local stakeholder consultations and meetings were considered during the monitoring period through these annual consultations. This was verified by AENOR through (as indicated in the verification report, evidence D15 and interview I14-I21) the procedures for consultation and the minutes of the meetings (reviewed in hard copy in the WA office for the 8 communities visited), cross-checked with the testimonies obtained in the audit interviews (described in Findings 1 and 6). From these meetings, 95 comments were recorded of which 43% of them involve with infrastructure construction when 22% are land tenure related and only a few involve education, health and forest protection. All of the comments received were compiled, analyzed and submitted to the CEO of WA. There was no evidence of unattended inputs. The conclusions regarding the evaluation are those indicated in sections 4.3.4, 4.3.5, 4.3.6, 4.3.8 and 4.3.12 of the verification report.

c) All relevant stakeholders gave their unconditional and free consent for all project activities to commence and continue throughout the monitoring period. (CCB Standards, v3.0, Section G5.2, Sustainable Development Verified Impacts Standard, v1.0, Section 2.4.3, VCS Standard, v4.3, Section 3.17.16(1))

The stakeholder whose consent is required is the communities (See the list of stakeholders identified in Finding 6, Action Required 1). From these two rounds of community meetings held by PP, there were a total of 2,196 participants (35 participants/community on average) of which 1,294 participants were women. Each participant is a representative of his/her household. Details for all SBIA consultation and FPIC meetings to date, including dates, locations and number of meeting attendees were provided to AENOR.

After checking the minutes of the meetings (reviewed in hard copy in the WA office for the 8 communities visited), crosschecked with the testimonies during the audit consultations, AENOR deemed that the communities gave their unconditional and free consent for all project activities to commence and continue throughout the monitoring period (at least with a >50% of the attendees approval).

In any case, it is important to note that Verra in its regulatory documents does not define a minimum threshold to consider whether consent can be considered representative or not, e.g. defining a minimum % of approval, or determining whether consent should be granted by the community in general (by individual, by household), or by only those who have intended to participate in the meeting, or by local leaders, to mention some examples. Under this circumstance, the consent was interpreted by the PP as the approval of the majority of the community participants. If confidentiality continues to be questioned, an opportunity for improvement is that, in addition to Verra providing the previously mentioned guidelines, the PP conducts an anonymous vote (instead of a show of hands).

d) Consent was free of coercion, intimidation, manipulation, threat, or bribery. (CCB Standards, v3.0, Section G5.2, Sustainable Development Verified Impacts Standard, v1.0, Box 4)

The only way in which AENOR could evaluate whether the consent was free, that is, under no coercion, intimidation, manipulation, threat, or bribery, was by directly asking the communities if they had felt under these circumstances to express their opinion and give or deny approval. To this end, an **extensive consultation** was carried out by AENOR (See Finding 1, Action required 3, Response A), **based on risk approach** (See Finding 1, Action required 3, Response B), **confidential** (See Finding 1, Action required 2, Response B and C), **culturally appropriate** (See Finding 1, Action required 2, Response D), where participants indicated that decisions and opinions had been made freely.

2. The VVB must explain how it verified that the “FPIC meetings” were conducted in a timely and culturally appropriate manner, including language and gender sensitivity, and in a neutral and accessible setting.

According to the PP, the meetings were conducted in Khmer, using simple and easy-to-understand words with no jargon or slang involved. Communication between the project staff and villagers were done openly and professionally in a tension-free ambiance with no discrimination and that participants were given the opportunity to provide feedback on the project design and implementation.

Meetings were conducted by appointed FPIC officers, previously announced, and were called at public locations, such as village buildings and schools (where other meetings are usually hold), in order to provide an accessible/neutral setting.

Again, the only way in which AENOR could evaluate whether the meetings were conducted in a timely and culturally appropriate manner, including language and gender sensitivity, and in a neutral and accessible setting, was by directly asking the communities if they had felt under confidence, and with all the knowledge, to express their opinion and give or deny approval. To this end, an **extensive consultation** was carried out by AENOR (See Finding 1, Action required 3, Response A), **based on risk approach** (See Finding 1, Action required 3, Response B), **confidential** (See Finding 1, Action required 2, Response B and C), **culturally appropriate** (See Finding 1, Action required 2, Response D), where participants indicated that the information, location and environment was accessible enough to provide an opinion without limitation.

3. The VVB must describe how it assessed and concluded that the FPIC process included the ability to withhold and/or give consent for any and all project activities.

After each consultation meeting concludes, the appointed FPIC officers request that the participating stakeholders (community member voluntarily assisting) indicate their consents or disapprovals with the Project by raising or keeping their hands down. Attached to this PRR is the procedure to carry out the annual FPIC meetings that the PP holds in all communities (29 in the area of influence). The agenda includes the approval or withdrawal of consent to project activities. The denial of consent implies an analysis of the reasons, in order to address the root cause and subsequently carry out a renegotiation considering various aspects such as open dialogue, mediation and finally respect for the decision to reject the activities of no subsequent approval if it were the case.

Regarding the evaluation by AENOR, the inclusion of this point in the agenda was confirmed as well as point 1 and 2 of this same Finding 2 (see procedures above), and the participants showed knowledge that some or all of the project activities can be withdrawn or withheld if it is justified, within the context in which, in any case, the legislation (regarding land tenure, land rights, environment, etc.) must be applied independently of

this project. Nor were any comments received in the meetings with the VVB that could conclude that the community wished to withdraw or withhold its consent, or that, where appropriate, this rejection had not been addressed.

It is worth remembering that, as indicated in Finding 2 Action required 1 d), Verra in its regulatory documents does not define a minimum threshold to consider whether the withdrawn or withhold of the consent can be considered representative or not.

4. The VVB must describe how it determined when the incidents referenced in Section 4.3.12 of the CCB/VCS verification report occurred and how it assessed that the project handled any resulting disputes properly.

In the verification report it was stated “There are instances of community members and outsiders clearing land they know they do not own, in order to try and claim it. However, these disputes are new and the legal right to the land is clear. The project is protecting the rights of stakeholders.” It is important to clarify that, even when this is reported in CCB/VCS Verification Report issued by Aster Global on 11 May 2021, these are not the same cases, but the same type of infringement: land encroachment and installation of structures inside the project area by community members or outsiders without land tenure or use rights, for example for illegal logging and wood processing. Therefore, when it is mentioned that they are “new cases” it refers to different individuals or different locations, not the same ones that were reported in the previous period, since generally the offenders are quickly evicted and prosecuted.

The procedure is as follows: when an illegal structure is found in the Protected Area due to absent and/or ineffective law enforcement, the rangers of the Cardamom Forest Protection Program (CFPP), led by the MoE Judicial Police and supported by the Royal Gendarmerie Khmer with technical support from WA, follow specific legal procedures to address the case. Before removing an illegal structure found inside the Protected Area, the CFPP patrol units always provide notice by installing a warning sign and bringing the suspect to the Provincial Department of Environment to establish a reasonable period of time to voluntarily move out the Protected Area (usually up to 2 months). After that period has passed, if the suspect did not comply with the dismantle contract, the patrol unit informs the suspect that they will be charged under Article 62.1 of the Law on Protected Areas. The MoE Judicial Police also informs the suspect that they have a right to an attorney and will offer to connect with a volunteer attorney. The suspect will then be apprehended and escorted to the patrol station to complete documentation. All of these legal procedures conform with the Law on Protected Areas and the Criminal Code Procedure, which are in conformity with the Constitution of Cambodia. To further support the suspect's rights to access a legal representative, the CFPP is now distributing the list of available volunteer lawyers in each relevant province at each patrol station.

Therefore, AENOR observed that the procedure used by the PP to resolve these incidents is in accordance with the law (with respect to illegal activity in the Protected Areas, and also with respect to land ownership and use rights), and it is enforced properly by the PP, which is the one who has the competence to do it, and it is sufficient. The above conclusion was obtained from the consultation with the Deputy Secretary General (National Council for Sustainable Development) representing the PP on behalf of the Government, interviews with 3 groups of rangers of the Cardamom Forest Protection Program (Tiger Reintroduction Station, Sre Ambel Patrol Station, and Chambak Patrol Station), interviews with WA (Law Enforcement manager; and Watershed, Biodiversity and Land Use conflicts resolution manager; whose names are

reported in the verification report), as well as crosschecked with the communities consulted, who were aware of the procedure to deal with the disputes reported.

Verra Response

Verra acknowledges AENOR's response regarding disputes. However, this finding cannot be closed.

Several sections of AENOR's response include information directly from WA's publicly available [open letter to stakeholders](#). AENOR must clearly describe how it assessed WA's claims, and submit evidence to Verra that includes, but is not limited to the following:

- Evidence to support the claim that the "CFPP is now distributing the list of available volunteer lawyers in each relevant province and each patrol station";
- Description and evidence of "consultation with the Deputy Secretary General (National Council for Sustainable Development)";
- Records of interviews (including interview questions, auditor notes, recordings, and/or transcripts) with "3 groups of rangers of the Cardamom Forest Protection Program (Tiger Reintroduction Station, Sre Ambel Patrol Station, and Chambak Patrol Station)";
- Records of interviews (including interview questions, auditor notes, recordings, and/or transcripts) with "WA (Law Enforcement manager; and Watershed, Biodiversity and Land Use conflicts resolution manager; whose names are reported in the verification report)"; and
- Description and evidence of consultation with "the communities...who were aware of the procedure to deal with the disputes reported".

VVB Response

- **Evidence to support the claim that the "CFPP is now distributing the list of available volunteer lawyers in each relevant province and each patrol station";**

Indeed, there are responses that correspond to WA's open letter, since it is the most structured and complete document available as a response, in addition to the audit findings. Regarding "the list of available volunteer lawyers in each relevant province and each patrol station" this is actually a current activity, it was not carried out in the audited period so its verification does not correspond to AENOR. Therefore, the information available is that provided by the PP and WA, but not under the responsibility of verification of AENOR. However, the following evidence are available: See Annex 1.

Prakas no. 1584 of the Ministry of Justice dated October 7, 2020 listed 124 pro bono legal lawyers across country-wide, and the Decision of the Royal Government of Cambodia no. 001/19 dated February 27, 2019 established the Samdech Techo Volunteer Lawyers, which consisted of 67 pro bono legal lawyers across country-wide.

The CFPP operates across 5 provinces, including Sihanouk Ville, Koh Kong, Pursat, Battambang, and Kampong Speu. Therefore, the lists of pro bono legal lawyers of the Ministry of Justice and the Samdech Techo Volunteer Lawyers are being distributed only in the 5 provinces of Sihanoukville, Kampong Speu, Koh Kong, Pursat, and Battambang with the responsible lawyers of the respective provinces.

List of pro bono lawyers with the lawyers' photo, name, and phone number of each province displayed at each CFPP patrol station on the information board since November 2023. The pro bono lawyers list will be shown to the suspect by the judicial police officer, and the suspect could contact the lawyer for free service. Please find attached the photo taken as the proof of its delivery.

The CFPP manager instructed directly in a meeting and also issued a MEMO to all CFPP staff and government counterparts working in the program to inform the suspect of their right to access a pro bono legal lawyer from the Samdech Techo Volunteer Lawyers and provide them with the contact information of the lawyers of their choice. Please see attached MEMO from CFPP Manager to CFPP staff and government counterparts working in the program.

Additionally, CFPP also distributed the printout list of the Samdech Techo Volunteer Lawyers and the list of pro bono legal lawyers issued in the Prakas of the Ministry of Justice, compiled into a booklet along with the benefit-sharing policy and Summary of Feedback and Grievance Redress Mechanism, to each station for distribution to suspects and their families. Please find the soft copy of the booklet attached. 70 copies of the booklet were delivered to 15 CFPP stations across the project by the end of July 2024.

For the community, the SCRP FPIC team also distributed the same booklet that consisted of the printout list of the Samdech Techo Volunteer Lawyers and the list of pro bono legal lawyers issued in the Prakas of the Ministry of Justice, along with the benefit-sharing policy and Summary of Feedback and Grievance Redress Mechanism to the villagers of the 29 target villages of the SCRP. As of today, 21 target villages have received the booklet with information and explanations provided by the SCRP FPIC team. Please see attached the folder of photos taken from the FPIC meetings as proof of the acknowledgement of the communities/claimants of the existence of this list at the community.

Note: In Chomnoab, Pralay, Thmor Doun Pov, and O'som communes, the FPIC meetings were held at the commune level, with participants from every village of each commune having participated¹.

Chomnoab commune:	Pralay commune:	Thmor Donpov commune:	Osom commune:
Chrak Russei village Chomnoab village	Chamnar village Samrong village Top Khley village	Koh village Prek Svay village	Osom village Chhay louk village Kien Chongrok village

Regarding the process to recruit the lawyers, the project has distributed two lists of pro bono legal lawyers to the communities, and each CFPP station now has them available. The pro bono legal lawyers are the lawyers of the government appointed by Prakas no. 1584 of the Ministry of Justice dated October 7, 2020, and the Decision of the Royal Government of Cambodia no. 001/19 dated February 27, 2019 established the Samdech Techo Volunteer Lawyers. These lawyers are mandated to provide a free-of-charge legal service to the public. The government, not the project, directly appoints these pro bono legal lawyers, thereby maintaining their independence from the project. In this case, the project serves as a communication channel, disseminating information about the existing pro bono legal lawyers to the communities surrounding the project area. This ensures that all villagers are aware of their right to legal representation. If they cannot afford it, the government provides pro bono legal lawyers to defend them against charges by the prosecutors for any violations of the law and regulations in force.

The distribution of booklets to suspects and their families is an additional measure taken by the station beside posting the list of pro bono lawyers on the information board at each CFPP station. The implementation of this

¹ In Annex 1 There are 15 folders for 21 communities because in Chomnoab, Pralay, Thmor Doun Pov, and O'som communes, the FPIC meetings were held at the commune level, with participants from every village of each commune having participated. Therefore, the number of villages is 21, and the number of FPIC meetings is only 15, since 4 of them were held at the commune level.

new measure is currently underway, and CFPP stations have not yet distributed any booklets to suspects or their relatives because the booklets are just being delivered to the station today.

- **Description and evidence of “consultation with the Deputy Secretary General (National Council for Sustainable Development)”;**

H.E. Choup Paris as Director General of the General Department of Environmental Knowledge and Information at the Ministry of Environment was interviewed on June 16 2022 at the offices of the Ministry. The collaboration revolved around the collaboration between WA and government, Sub-Decree No. 30, the implementation of activities and compliance with the law, possible conflicts regarding land tenure, mechanism for distributing benefits to communities, among other topics. Graphic evidence can be found in Annex 2.

- **Records of interviews (including interview questions, auditor notes, recordings, and/or transcripts) with “3 groups of rangers of the Cardamom Forest Protection Program (Tiger Reintroduction Station, Sre Ambel Patrol Station, and Chambak Patrol Station)”;**

There are no recordings or attendance lists, as they undermine confidence during the audit. To maintain anonymity, given the context of the project, the names of the members of the patrol are not indicated either. The idea is that during the interview they can feel free to speak without being identified. The conversation dealt with their background, the illicit activities they usually find, the training to exercise their activity, the procedure in case of finding someone carrying out an illegal activity, the alleged accusations of violence, among other topics. There is no transcription of the conversations, since it is not operational to take them by hand and for the reasons mentioned the conversations are not recorded. The auditor's notes are internal and do not represent evidence that an external party can freely interpret without the context of the rest of the audit elements, so they are not provided. However, photos of the interviews are provided in Annex 2 as evidence that the interview took place, although there is no authorization from the interviewees for publication.

- **Records of interviews (including interview questions, auditor notes, recordings, and/or transcripts) with “WA (Law Enforcement manager; and Watershed, Biodiversity and Land Use conflicts resolution manager; whose names are reported in the verification report)”;** and

Both people are already identified in the monitoring report, with names and surnames, since in their case anonymity is not appropriate due to the position they occupy, and they have their permission to provide such information. The conversation focused on the clarity of land uses and land tenure, project activities, illegal activities that occur within the project area, Sub-Decree No. 30, the alleged allegations, the procedure in case of finding someone carrying out an illegal activity, among other topics, since they accompanied the group throughout the audit. For the above reasons, there are no recordings or transcriptions, and the auditor's notes are a record for internal use. In Annex 2 there are photos to prove that the meeting took place.

- **Description and evidence of consultation with “the communities...who were aware of the procedure to deal with the disputes reported”.**

The communities consulted are already described in the MR by name and number of attendees. Topics covered included: knowledge about the project, delimitation of the project area, clarity on land tenure and uses, the communication mechanism with the project and the grievance system, the benefit-sharing mechanism and project activities, negative impacts, notification of meetings and audits, FPIC processes and their perception of the project, dissemination of information, High Conservation Values, among other topics. In order not to undermine trust, conversations are not recorded and no attendance list is taken. Transcribing

a translation while facilitating a conversation is not operational and does not add value, since normally what is noted is what is out of what other sources have expected them to respond to. When you get to the field, all the documentary review has been reviewed before. The auditor's original notes are for himself, so their content is not made for reading by third parties and neither is it appropriate to edit them to be so, since that is what they are private internal notes for. However, the conclusions are those indicated in the MR. If the purpose is to prove that the meetings occurred, photographs are attached in Annex 2.

Finally, it should be clarified that there is no Verra normative document or the accreditation system (ISO) that indicates the way in which information has to be specifically collected by the audit team, but it is at the discretion of the audit team to determine in each case what is the best way to collect evidence, systematize it, analyze it, etc. in a context such as that of this project. That is the reason why attendance lists or recordings were not taken; or there are no transcripts of the conversations they had for nine days with dozens of people. In conclusion, if the purpose is to prove that the VVB consultations took place, the photos are attached in Annex 2 (which cannot be made public because there is no authorization to do so).

Verra Response

Verra acknowledges the additional clarification and evidence provided by AENOR. Verra received additional responses and commitments from WA in a separate report.

This finding is closed.

Finding 3 – Ongoing Disputes

Issues

1. Section 2.5.5 of the CCB/VCS monitoring report and Section 2.3.7 of the SD VISta monitoring report do not provide sufficient details about ongoing conflicts and disputes.

Action Required

1. The VVB must clarify whether it observed evidence of ongoing conflicts or disputes in the project zone. If it did, the VVB must provide an assessment of the conflicts or disputes to confirm whether:
 - a) The project has properly identified all ongoing unresolved disputes during this monitoring period and those which have been resolved in the past 10 years.
 - b) The project has not prejudiced the outcome of any ongoing unresolved disputes.
 - c) The project has taken the measures needed to support the resolution of conflicts and disputes.
2. The VVB must describe at least the following details of all ongoing conflicts or disputes:
 - a) The parties involved.
 - b) The location of lands, territories, and/or resources involved.
 - c) The impacts of the dispute on the project and the implementation of project activities.
 - d) The involvement of the project and/or project personnel in the dispute or dispute resolution.
 - e) How the implementation of the project will not exacerbate the conflict or influence the outcome of an unresolved dispute.

Program Rule(s)

Climate, Community & Biodiversity Standards, v3.0, Section G5.5

Sustainable Development Verified Impacts Standard, v1.0, Section 2.4.8

VCS Standard, v4.3, Sections 2.2.1 (Principle of Completeness), 3.17.16 (1) and 3.17.18

VVB Response

1. The VVB must clarify whether it observed evidence of ongoing conflicts or disputes in the project zone. If it did, the VVB must provide an assessment of the conflicts or disputes to confirm whether:

- a) The project has properly identified all ongoing unresolved disputes during this monitoring period and those which have been resolved in the past 10 years.
- b) The project has not prejudiced the outcome of any ongoing unresolved disputes.
- c) The project has taken the measures needed to support the resolution of conflicts and disputes.

Currently there are no ongoing conflicts or disputes in the project zone, as far as AENOR had evidence through an **extensive consultation** carried out (See Finding 1, Action required 3, Response A), **based on risk approach** (See Finding 1, Action required 3, Response B), **confidential** (See Finding 1, Action required 2, Response B and C), **culturally appropriate** (See Finding 1, Action required 2, Response D), where participants indicated that there were no ongoing unresolved disputes during this monitoring period in the communities consulted. This was crosschecked and extended to the entire project area by consulting the Deputy Secretary General (National Council for Sustainable Development) representing the PP on behalf of the Government, interviews with 3 groups of rangers of the Cardamom Forest Protection Program (Tiger Reintroduction Station, Sre Ambel Patrol Station, and Chambak Patrol Station), interviews with WA (Law Enforcement manager; and Watershed, Biodiversity and Land Use conflicts resolution manager; whose names are reported in the verification report).

Regarding other cases, not classified as conflicts, see the reported incidents Finding 2 Action Required 2, whose resolution time is fast. Additionally, AENOR had access to the following case reported in point 2 below, which was also not classified as an ongoing conflict due to its nature.

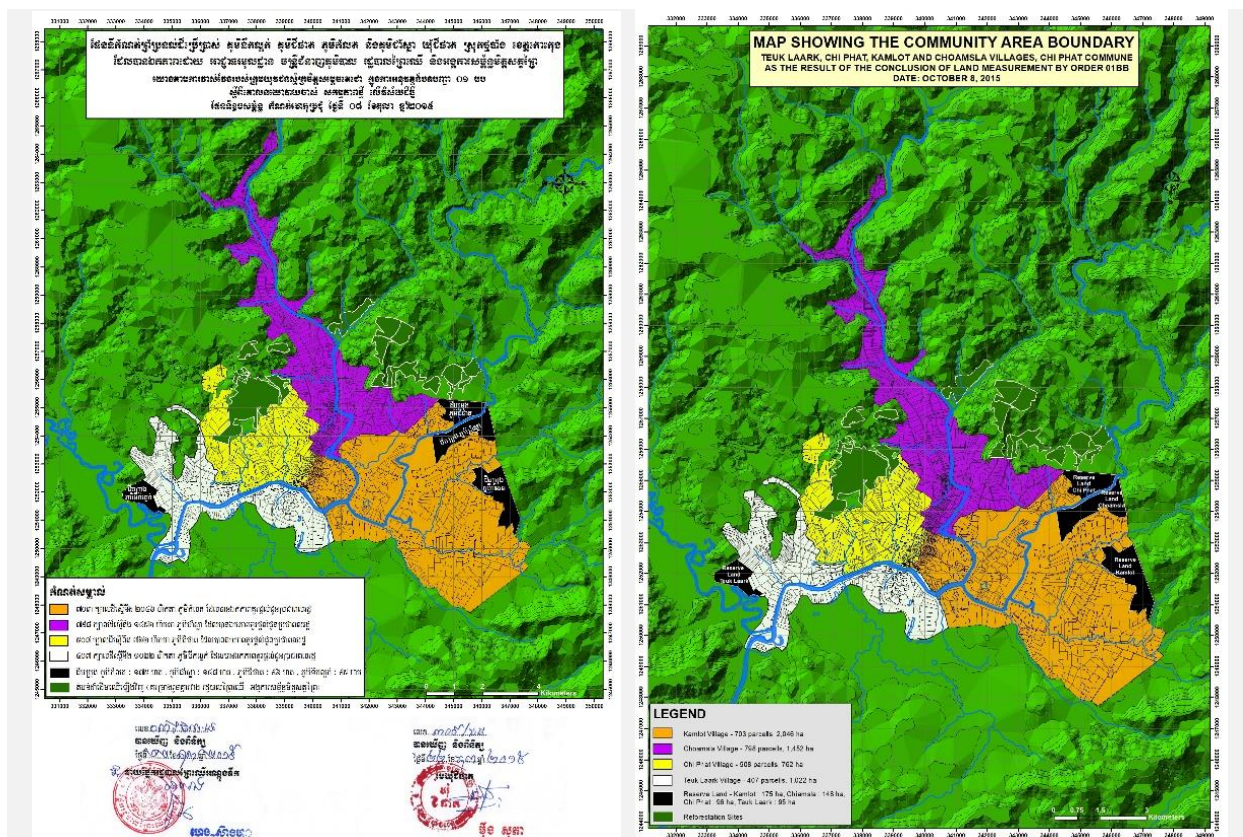
2. The VVB must describe at least the following details of all ongoing conflicts or disputes:

As said before, in 2021 there was no conflict related to land ownership or land rights between the project and the communities. However, there was a misperception amongst the community Teuk Laak and the project, since the first one believed that the issuance of land titles for community members was held back by the project.

The project worked together with the Teuk Laak community and the Chi Phat commune council (as Teuk Laak is a village in Chi Phat commune) to identify the community area boundary. These works were conducted in 2015, resulting in the boundary conclusion of the area used by the community, concluded on October 8, 2015.

The map below shows the Teuk Laak land parcels (Community area map of Chi Phat commune) displayed in white color (on the lower-left corner of the map) and the 95 hectares of reserve land for further expansion (displayed in black color, adjacent to the individual land parcels).

Community Area map of Chi Phat commune, dated October 08, 2015



As of 2021, the Teuk Laak community had their land rights secured, as the community members had received soft land titles long before (since 2015, at the conclusion of the community area map of Chi Phat commune), but the absence of individual hard land titles was still an issue of dissatisfaction for some community members. They wanted the project to issue their land titles, believing that the issuance was held back by the Project. It was later explained to the community members that the project has no legal authority to issue land titles and that such authority resides with the Provincial Land Management and Cadastral Office.

By May 30, 2022, all the land titles had been finally issued for Teuk Laak village by the Provincial Land Management and Cadastral Office. Please see the Provincial Authority Announcement informing the community of Tek Laak of the issuance of the land titles (Announcement dated May 30, 2022).

Provincial Authority Announcement informing the community of Teuk Laak on the issuance of the land titles

	Kingdom of Cambodia Nation Religion King Koh Kong Provincial Administrative No 191/22 S.C.N Koh Kong, May 26 2022 Notification on Distribution Real Estate Ownership Certificate and Nullification of Land Use Rights Certificate or Real Estate Certificate for one village Tuek L'ak Village, Chi Phat Commune, Thmor Bang District, Koh Kong Province The Koh Kong Provincial Administration is honored to inform the owners of the land plots located in an identification area of Tuek L'ak Village, Chi Phat Commune, Thmor Bang District, Koh Kong Province that according to Sub-Decree No. 46, dated May 31, 2002 on the procedure of establishing cadastral index map and land register and Sub-Decree No. 122, dated June 09, 2016 on the revision of Article 06.07 and 11 of Sub-Decree No.46, dated May 31, 2002, on the procedure of establishing cadastral index map and land register under the Land Registration Process in accordance with Regulation No.01BB, the Department of Land Management, Urban Planning, Construction and Cadastral of Koh Kong Province will distribute the Real Estate Ownership Certificate (Ownership Certificate) to the owner of land plots in the identification area above in this coming May 30 2022, at Office of Land Management, Urban Planning, Construction and Land Administration in Thmor Bang District. For Land Use Rights Certificate (feather titles) or Real Estate Certificate that were issued by the Cadastral Administration in the previous years will be nullified starting from the date of issuance of the Real Estate Ownership Certificate above. Following the above-mentioned, may all the owners of the land plots that have previous Land Use Rights Certificate or Real Estate Certificate to bring it to the Cadastral Administration Officer to receive the new Certificate instead, which will be handed over by Cadastral Administration Officers at the Office of Land Management, Urban Planning, Construction and Land Administration in Thmor Bang District starting from May 30, 2022, until June 1, 2022, as a limit. For all the creditors that mortgaged or hypothec, which is related to the location of the land plots in the identification area above, please kindly bring the certificate to Cadastral Administrative Officers for the regulation in order to guarantee your check. Governor [signature and stamp] MITHONA PHOUTHONG Cc: - Ministry of Interior - Ministry of Land Management, Urban Planning, Construction Office "To be informed" - Sub-sector Program of land registration Administration Department of CNSP Koh Kong Province - Thmor bang Provincial Administration - Office of CNSP Thmor Bang District "To be informed and propagated" - Chronological Documents
Thus, a) The parties involved. Some community members of Teuk Laak village. b) The location of lands, territories, and/or resources involved. Community Area of Teuk Laak Village, Chi Phat Commune. c) The impacts of the dispute on the project and the implementation of project activities. None, as it is not a real dispute, but a misinterpretation of the situation. d) The involvement of the project and/or project personnel in the dispute or dispute resolution. The project had no authority on the issuance of titles; however the project showed strong support for the process to the provincial and cadastral officials. e) How the implementation of the project will not exacerbate the conflict or influence the outcome of an unresolved dispute. The implementation of the project does not exacerbate the conflict and will not influence the outcome of unsolved dispute, as there is no dispute, but merely a misunderstanding which was later addressed by the issuance of land titles conducted in 2022; to whose positive resolution the project collaborated. Verra Response Verra acknowledges the response from AENOR regarding ongoing conflicts and disputes.	

Verra received additional responses and commitments from WA in a separate report. This finding is closed.

Finding 4 – Land Rights

Issues

1. Section 2.5.1 of the VCS/CCB monitoring report and Section 2.3.3 of the SD VISta monitoring report state that: “Under Order 001 all land in the Project Zone has been titled and all property clearly delineated.” This statement contradicts the disputes discussed in Section 2.5.5 of the CCB/VCS monitoring report and Section 2.3.7 of the SD VISta monitoring report.
2. It is unclear how the VVB assessed the project’s impacts during the monitoring period on the rights of landowners to occupy and use their land in the project zone.
3. Section 4.3.12 of the CCB/VCS verification report verifies the project protects the rights of local peoples, communities, and other stakeholders. However, the verification report does not address the project’s impact on community stakeholders’ access to state public resources.

Action Required

1. The VVB must clarify and confirm the status of land rights in the project zone during this monitoring period.
2. The VVB must provide an assessment of land rights in the project zone during the monitoring period. The assessment must include at least the following:
 - a) A conclusion regarding the statement that “all land in the Project Zone has been titled and all property clearly delineated.” (SD VISta Monitoring Report, Section 2.3.3, CCB/VCS Monitoring Report, Section 2.5.1)
 - b) An assessment of the project’s impacts on the rights of landowners (including, but not limited to, individuals, groups with communal titles, and indigenous peoples) in the project zone.
 - c) An assessment of the project’s impacts on unresolved land disputes and ongoing titling processes in the project zone.
 - d) An assessment of the project’s impact on the community stakeholders’ access rights to state public resources.

Program Rule(s)

Climate, Community & Biodiversity Standards, v3.0, Sections G5.2 and G5.5

Sustainable Development Verified Impacts Standard, v1.0, Section 2.4.2

VCS Standard, v4.3, Sections 2.2.1 (Principle of consistency) and 3.17.13

VVB Response

- 1. The VVB must clarify and confirm the status of land rights in the project zone during this monitoring period.**

The status of legal land rights in the Project Area and Project Zone did not change since the validation of the PD, where it is described the different types of property in both areas according to the Land Law of 2002 (section 2.6.1 in PD).

The entirety of the Project Area is State Public Property comprised of protected areas managed by the Ministry of the Environment. Project Zone, outside the Project Area, are both state private property (including social and economic land concessions) and private property (which comprises land legally allocated to community members, some of which has been sold).

The customary and legal property rights in the Project Area are also described. On the other hand, under Order 01 all land in the Project Zone has been titled and all property clearly delineated. As such, the project works with communities to clarify property zones and demarcate boundaries between separate property types (see clarification below).

That said, AENOR confirms that the status of land rights in the Project Area and Project Zone did not change since validation, according to the information provided by WA, Director general of the General Department of Environmental Knowledge and Information at the Ministry of Environment, and the revision of applicable law, including Sub-Decree No. 30.

2. The VVB must provide an assessment of land rights in the project zone during the monitoring period. The assessment must include at least the following:

- a) A conclusion regarding the statement that “all land in the Project Zone has been titled and all property clearly delineated.” (SD VISTA Monitoring Report, Section 2.3.3, CCB/VCS Monitoring Report, Section 2.5.1)**

WA has worked with the Royal Government of Cambodia and provincial, district, and commune authorities since 2003 to develop clear spatial land- use plans for the Southern Cardamom, including securing community land tenure across a total of the 29 villages in 11 communes. This work has benefited 5,980 families including 3,024 in Project Zone communities (there are no communities within the Project Area). WA worked closely with the MoE for much of the zoning process between 2002-2016. The work included consultations to delineate the community areas and forest boundaries, and help codify communities’ rights in regard to these areas in the Project Zone, comprised of both state private property (including social and economic land concessions) and private property (which comprises land legally allocated to community members, some of which has been sold). This work also involved verifying the land use claims made by long-term community occupants through aerial imagery, ground checks, etc. This demarcation clearly highlights community land and helps mark the boundaries of the strictly protected zones (Core and Conservation) which comprise the Project Area and which are reserved for biodiversity conservation and ecosystem services. During this monitoring period (third for VCS/CCB and second for SD VISTA), the zoning and demarcation activities have continued, so that the land for local communities is clearly delineated. 9 land use planning meetings have been conducted with participation and support from local authorities. 411 demarcation posts were installed along 63 km of the community land boundaries in Tatai Leu and Russey Chrum communes.

The result was the delineation and mapping of community area boundaries that enabled the land tenure rights of existing members of these communities to be formally recognized and have access to cadastral land titling. The Provincial State Land Management Committee then started to issue official land title documentation to the community members, which is a lengthy and bureaucratic process.

Section 2.5.1 of the VCS/CCB monitoring report and Section 2.3.3 of the SD VISTA monitoring report stated that “Under Order 001 all land in the Project Zone has been titled and all property clearly delineated”. This statement can be read to be broader than intended because while all land in the Project Zone had been zoned

and mapped, the distribution of official land title documentation was not complete. Out of 12,248 parcels which correspond to 28,883 hectares have been measured and allocated to the community under Order 01 BB, 7,249 parcels which correspond to 19,460 hectares have been provided with official land title documentation as of June 2023.

Further, even if the land had been zoned and titled it does not preclude the potential for confusion over land tenure by community members which potentially can result in disputes. Thus, according to AENOR interpretation, there is no contradiction amongst the two statements.

b) An assessment of the project's impacts on the rights of landowners (including, but not limited to, individuals, groups with communal titles, and indigenous peoples) in the project zone.

In relation to the projects impacts on the rights of landowners in the project zone, the communities exist within a buffer zone, known as the Project Zone located outside of the Project Area, meaning the communities are within the community zone of the protected area and thus are governed by the zone regulations outlined in the 2008 Protected Areas Law, which was established prior to and separate from the this Project. However, a Project activity is to specifically work with local authorities to distribute land titles to alleviate uncertainty regarding land tenure and rights (section 4.3.1.1 (4) of the MR). Another activity is to support enforcement of the 2008 Protected Areas Law through using carbon finance to increase the ranger-community enforcement mechanisms (section 4.3.1.1 (6) of the MR), to ultimately prevent deforestation. Such an activity could impact illegal occupancy (if such occupancy and resource use is not in compliance with established laws and regulations) by supporting enforcement of such previously established laws.

As of 2021, all 29 villages (13 communes) had their community area boundaries established and clearly delineated (since 2016) and were residing inside protected areas.

- 27 communities are located inside the Project Zone.
- 2 communities—Pur Beung Chhay Reap and Pur Beung Kamlot villages—are located inside the Project Area.

As such, private land ownership is legally allowed inside the community area, while in the remaining parts of the protected areas, customary use rights are guaranteed by law. Therefore, the customary collection of NTFPs is allowed for family use only. Commercial use of NTFPs, as well as falling trees, required prior permission from the Ministry of Environment.

The project recognizes and respects the rights of indigenous people to access sacred forests as well as the right to request communal land titling registration. As per the monitoring period (2021), there are neither sacred forests nor communal land titles registered inside the project area. That said, in AENOR's opinion the project's impacts on the rights of landowners (including, but not limited to, individuals, groups with communal titles, and indigenous peoples) in the Project Zone and Area is, at least, not negative.

c) An assessment of the project's impacts on unresolved land disputes and ongoing titling processes in the project zone.

In relation to the project's impacts on unresolved land disputes and ongoing titling processes in the project zone, please refer to response provided above in Finding 3 – Ongoing Disputes, action required 2.

d) An assessment of the project's impact on the community stakeholders' access rights to state public resources.

In relation to the projects impacts on community stakeholders access rights to state resources, much of the project zone and specifically area where communities are located is governed by the 2008 Protected Areas Law. Therefore, the Project does not explicitly restrict access rights to state resources, but given that a project activity was to amplify the already existing governmental enforcement of laws and regulations that may relate to such resources, the project may have had some impact on access rights.

For example, Article 22 of the Law on Protected Areas 2008 states that the State recognizes and secures access to traditional uses (defined by the law, traditional uses include collection of naturally-dead woods, by-products for traditional medicines, vegetables and fruits, and legal hunting to meet only the occasional needs of the family), local customs, beliefs, and religions of the local communities, and indigenous ethnic minority groups residing within and adjacent to the protected areas.

Access to traditional uses of natural resources and customary practices of local community and indigenous ethnic minority groups on family scale (defined by the law, family uses include the use of natural resources, including trees, wild animals, forestland, etc., which have passed from generation to generation, and these activities do not serve any commercial/business purposes) may be allowed within sustainable use zone and conservation zone following guidelines which shall be prescribed in the Prakas of the Ministry of Environment.

People from local communities have free access to the forest to make non-destructive harvests of Non-Timber Forest Products (NTFP) such as fruit, bark, mushrooms. What is not allowed is to harvest wildlife, nor to produce charcoal kilns for commercial sales.

Though the collection of NTFPs shall be restricted if it appears to be destructive practices based on Article 41, point 2 referring to the collection of NTFPs states that each protected area shall be protected against destructive practices or harms caused by illegal land claim, collection, commercialization, pollution in the areas containing valuable biological resource, forest fire, swidden agriculture, transmission of diseases and pests including invasive plants and animals. In harvesting NTFPs, no trees should be cut. While some local villagers are adhering to the law as they have only collected non-timber forest products just for the purposes of traditional and family uses, other villagers are misinterpreting their ways of forest products collection by destructively destroying the whole resource. For instance, cases of collecting Somroung fruit which have been reported by the rangers. Instead of collecting non-forest timber products, the people preferred to cut down the whole tree. This kind of practice provides a short-term benefit; however, it does not only pose destructive threats to the forest but it also heavily impacts the trees to not regrow, losing the forest cover, affecting the whole environment on a long-term period putting human lives, well-beings along with other living things at disadvantage, most importantly contradiction to the law.

All enforcement actions taken against members of the local community, including the ranger-community enforcement mechanisms (section 4.3.1.1 (6) of the MR) were solely in response to violations of the National and Local Laws, such as the Protected Area Law (2008) and Land Law (2002). Thus, the rights of community members to access state owned/managed resources were not impacted by any enforcement actions taken.

Verra Response

Verra acknowledges the response from AENOR regarding land rights.

Verra received additional responses and commitments from WA in a separate report. This finding is closed.

Finding 5 – Grievance Mechanism

Issues

1. It is unclear whether the grievance redress procedure allows for accessible and neutral spaces for stakeholders to submit grievances.
2. It is unclear if the implementation of the grievance redress procedure during this monitoring period has considered the social cultural norms of the impacted communities.

Action Required

1. The VVB must provide an assessment and conclusion as to whether:
 - a) The physical locations (Ministry of Environment branch office, Community Based Ecotourism offices, MOE Ranger stations) are culturally appropriate spaces and allow grievances to be submitted freely.
 - b) The electronic (Facebook, phone) grievance channels were accessible to all stakeholders, and these channels allowed grievances to be submitted freely.
2. The VVB must provide an assessment of the appropriateness of the grievance mechanism. The assessment must confirm whether:
 - a) The VVB is reasonably assured that stakeholders felt comfortable using the grievance redress procedure during the monitoring period to vocalize sensitive issues such as free, prior and informed consent, rights to lands, territories and resources, benefit sharing and participation.
 - b) Traditional methods of conflict resolution were available and used during the monitoring period.

Program Rule(s)

Climate, Community & Biodiversity Standards, v3.0, Section G3.8

Sustainable Development Verified Impacts Standard, v1.0, Section 2.2.14

VCS Standard, v4.3, Section 3.17.18

VVB Response

1. The VVB must provide an assessment and conclusion as to whether:

a) The physical locations (Ministry of Environment branch office, Community Based Ecotourism offices, MOE Ranger stations) are culturally appropriate spaces and allow grievances to be submitted freely.

The physical locations of the 7 boxes² in the communities (besides other ones located in WA and MoE offices in Phnom Penh) are the following:

1. Chambak Commune Hall
2. Dong Peng Commune Hall
3. Community Based Eco-tourism (CBET) Chipat Visitor's Center
4. Tong Ho Restaurant in Trapeang Rong
5. Thmar Bang District Hall
6. Community Based Eco-tourism (CBET) Chhay Areng Visitor's Center
7. Provincial Department of Kong Kong town

These means public buildings (Commune and District Halls) that are usually used for meetings and the two CBETs, amongst others and are located in central, transit areas and close to main roads, so, in the opinion of AENOR, they are neutral sites where stakeholders can deposit grievances freely.

Regarding confidentiality and cultural appropriate manner please see the following point.

b) The electronic (Facebook, phone) grievance channels were accessible to all stakeholders, and these channels allowed grievances to be submitted freely.

The grievance mechanism accepts inputs through various channels:

- 1) Boxes distributed in several locations,
- 2) Phone call,
- 3) Annual consultations, village chief, or commune chief
- 4) Directly at MoE/WA offices,
- 5) WA mail/Website,
- 6) Facebook.

It is understood that the stakeholders most likely to require accessibility to the Grievance Mechanism are c) workers in project activities, d) local communities, e) other beneficiaries and/or affected by the project (according to the stakeholders identified in Finding 6).

While the first four means mentioned above are accessible to local stakeholders, Facebook or Mail (electronic media) may not be if their use is unknown or the Internet is not available. However, an individual for whom electronic means were not accessible would still have four other means to submit a complaint. So, the requirement that absolutely all media can be accessible to all stakeholders, in addition to not being specifically required in Verra's regulatory documents, is in practice only possible by eliminating electronic media, however, on the other hand it would limit options, when precisely the optimal point is the greatest number of possible means.

² Currently the number has increased to one box in each of the 29 communities, but in the finding it is only reported regarding the monitoring period.

Regarding anonymity in the submission, unfortunately it is difficult to reconcile that it is at the same time 1) 100% confidential, 2) 100% accessible to all stakeholders, and 3) 100% culturally appropriate. For example, culturally, the most common form of complaint is oral, but annual meetings or going directly to the offices is hardly confidential, as well as any other oral way not yet considered, while on the other hand, a telephone complaint, in addition to being easily traceable if desired, may not be accessible to those in the project area who do not have a telephone or service.

Therefore, on the part of AENOR, during the audit what was valued was the diversity of media provided so that each stakeholder individually can decide how to submit their grievances, considering their access to the media, anonymity if required, and traditional/alternative means of communicating complaints. And in this sense, although there may be improvements, AENOR considers that it is sufficient to comply with the requirements of the applicable Verra standards, since there are several grievance channels which are accessible to stakeholders, and these channels allow grievances to be submitted freely.

2. The VVB must provide an assessment of the appropriateness of the grievance mechanism. The assessment must confirm whether:

a) The VVB is reasonably assured that stakeholders felt comfortable using the grievance redress procedure during the monitoring period to vocalize sensitive issues such as free, prior and informed consent, rights to lands, territories and resources, benefit sharing and participation.

As it is reported in the Verification Report, during the field visit, five of these grievance boxes were inspected by the audit team (four of which did not have any communication inside; and the only box that contained a communication was not a complaint, but a request not related to the project), with posters describing what boxes were for. They appear little used and community members stated that if they had a grievance, they would go directly to project staff or community leadership as that is the most common way of communication (considering that some people may be illiterate) and the reason why complaints/comments can also be submitted by oral means (2, 3, 4 above).

AENOR recognizes that, due to different factors, it is difficult to discern whether stakeholders felt comfortable using the grievance redress procedure during the monitoring period to vocalize sensitive issues, first of all because feeling comfortable is not a measurable parameter (which is not referred to in any Verra normative document either). Also, because the use or non-use of the grievance mechanism depends on many other factors beyond "feeling comfortable", so, even if few complaints are received or they are not related to HRW's allegations, it is difficult to attribute it to the fact that stakeholders do not use them because they are not culturally appropriate or confidential. That said, AENOR confirms that during the meetings the communities were aware of the complaints mechanism, the location of the boxes and other available means, and that no one expressed that it was a means through which they would not file a complaint because "they do not feel comfortable reporting sensitive issues". Last, cards with contact information for WA staff and a description of the grievances mechanism were distributed to a large number of households, as checked during the visit.

b) Traditional methods of conflict resolution were available and used during the monitoring period.

All comments or complaints are recorded in the complaint register by officers, with the following Information:

1. Whether it was delivered directly or indirectly to WA/MoE or via local authorities: village chief, commune chief or any other mean above described
2. If clarification is needed from the complainant

3. If the complaint is outside the domain of the REDD+ Project, to which relevant agency it will be directed
4. Execution time, with a maximum of 7 working days if a complaint is considered urgent.

A complaint is considered urgent if it is life-threatening, involves safety or security, could lead to serious injury to humans or wildlife, or could irreparably damage natural resources.

Each complaint is categorized and determines how it will be handled. These categories include Land and territory issues, Financial management, Environmental, and Safeguards. The urgency of a complaint is assessed based on the potentiality, likelihood, magnitude, and frequency of negative impact it could cause as well as possible mitigation measures and immediacy of available remedy. Complaints are to be treated as confidential to prevent unauthorized access, use, disclosure, modification, loss, and theft.

Once the village chief or commune chief has received a grievance, or through any of the described channels, they are required to respond to the aggrieved person(s) within 7 working days. The receiver will maintain full records of all grievances received, communications amongst the parts, and the agreed resolutions. If the parts cannot resolve the grievance in a mutually satisfactory manner, the aggrieved person may raise complaints and grievances to the Provincial Project Committee or its members either verbally or in writing. At this level, the MoE/WA Project Management Unit is obliged to 1) record every complaint and keep track of the status, and 2) keep complaints and grievances confidential unless otherwise directed by the aggrieved person(s). The Provincial Project Committee has to respond to the complaint within 7 working days from the date the complaint was received.

MoE/WA maintains a record book of all grievances received and their resolutions, which can be viewed upon request from project stakeholders or auditors. WA updates and presents the record of recorded cases to the Project Board Committee during its annual meeting.

Complainants receive a receipt with a specific tracking number for each complaint submitted. In addition, complainants are provided an explanation about the follow-up processes. Complaint resolution is based on the existing institutional mechanisms for each sector.

When complaints reach the provincial level, after internal screening and discussion, the project implementer might intervene by submitting registered complaints to the appropriate person or organization authorized to handle them such as complaints that involve complex problems that cannot be resolved at the village or commune or district level and are elevated to provincial, and national authorities or courts as appropriate.

Each complex complaint must be reviewed within 30 working days and investigated if necessary. The officer in charge of investigating complaints may request verification or additional information to determine the scope of investigations and if additional follow-ups are required. Such investigation may involve site visits, document reviews, and meetings with competent and authorized parties to solve the issues under investigation. Periodically, the complainant must be informed whether additional consultation is needed to respond to the complaint, or if further materials are needed to enable a proper investigation.

The investigation findings are used to document the decision-making process and to inform proposed improvements. The investigation timeline varies by case depending on the complexity of the problem. If the issue has not been resolved within two months, Complainants receive

The official follows up on the investigated complaint. The aggrieved party is consulted about any proposed settlement to reach a mutually agreeable solution for all parties in accordance with applicable laws and regulations. The complainant is issued a decision letter for settlement of the complaint and notification of complaint results.

The agreed action is implemented if the applicant accepts the proposed resolution. The grievance officer is responsible for ensuring the implementation of the coordinated action by relevant parties, including the agreed timeline for implementing the resolution. This process is recorded in the grievance note with supporting documentation. If necessary, regular monitoring is performed to verify the implementation.

Following the resolution, the grievance can be officially closed. This process involves having the complainants sign the settlement form to document their satisfaction with the resolution, documenting the action taken, and closing the case in the grievance registry.

So, in the opinion of AENOR, by receiving complaints through local authorities (village chief, commune chief), those who have a permanent local presence, and those who participate in meeting and decision-making spaces, the project seeks consider traditional methods of conflict resolution.

Verra Response

Verra acknowledges the response from AENOR regarding the project's grievance redress mechanism.

Verra received additional responses and commitments from WA in a separate report. This finding is closed.

Finding 6 – Stakeholder Communication with Auditors

Issue

1. It is unclear whether and how the VVB ensured that community members were able to communicate independently with the auditors during the site visit.

Action Required

The VVB must clarify how it confirmed direct and independent communication was facilitated between stakeholders and auditors. The VVB must elaborate on the following:

1. How it selected the stakeholders and confirmed the selection was representative of all project stakeholders.
2. How it confirmed the information provided by community members was an accurate reflection of community sentiment.
3. How it ensured interviews were conducted in a culturally appropriate manner.
4. Whether and how the VVB evaluated any risks to stakeholders associated with communicating openly with the VVB.

Program Rule(s)

Climate, Community & Biodiversity Standards, v3.0, Section G3.3

Sustainable Development Verified Impacts Standard, v1.0, Section 2.2.17

VCS Standard, v4.3, Section 4.1

VVB Response

1. How it selected the stakeholders and confirmed the selection was representative of all project stakeholders.

The stakeholders were selected from:

- the MR review and associated documentation provided (described in section 2.3 of the VCS/CCB MR3 and 1.7 of the SD VSta MR2),
- the previous documentation (PD and MR1 and MR2 and their validation and verification reports, publicly accessible in Verra Registry),
- the previous experience of the audit team, including a local expert who had already participated in the previous verification event,
- an independent search by the audit team in other sources (e.g. articles on the internet, public comments, etc.).

The consultation included all types of stakeholders identified in the Project:

- a) authorities,
- b) PP and other entities involved (WA and WWC),
- c) workers in project activities,
- d) local communities,
- e) other beneficiaries and/or affected by the project,
- f) rangers,
- g) technical team in the field for GHG estimation,
- h) Civil Society Organizations.

Note that in many cases, an individual can belong to several types of stakeholders, for example, they can be a community member and at the same time a worker, or they can be a beneficiary of the activities and at the same time participate as a carbon inventory technician; and in addition, there are other categories (such as gender, religion, or other groups that may be marginalized or minority) for which consultation may be required as an independent stakeholder or treated as a transversal category.

The visit area (project sector) and communities were selected by AENOR, not by WA, considering a risk-based approach, which means that effort is focused on aspects/areas/groups where a priori, more non-compliances (regarding the normative requests) could be found. Given that it is not materially possible to consult all stakeholders directly, a sampling was carried out depending on the type of stakeholder, considering that it was representative and extrapolated to the entire Project. Particularly, regarding local communities, of the 29 communities in the area of influence of the project, 8 were consulted (28%) during the field visit by the AENOR team in collective events where a total of 184 people (heads of families) participated, with representation from various ethnic groups, religions, geographical sectors of the project and a 40-60% balance between men/women. Considering that the visiting areas must rotate between audits, 28% of the audits are considered acceptable. On the other hand, it is important to mention that all these decisions are covered by the reference normative documents (described in section 1 of the VCS/CCB and SD VSta verification reports), particularly the audit practices included in ISO (ISO 14064-3:2006 and ISO 14065:2013), for which the VVB

is duly accredited, as well as the experienced auditors. Last, note that h) interested parties have the public comments period (2 each year in this project) to submit comments, so they were not directly consulted by AENOR, except the journalist and Carbon Pulse, as reported in Finding 1.

That said, in AENOR's opinion the selection was representative of all project stakeholders, since all types were consulted and a representative sample of them was directly interviewed as part of the field audit.

2. How it confirmed the information provided by community members was an accurate reflection of community sentiment.

The regulatory documents considered in the scope of the audit do not define what is meant by “reflection of community sentiment.” In AENOR's interpretation, the testimonies were:

- **Provided without influence or coercion:** The meetings were carried out exclusively between the audit team in the field (Carlos Jiménez as Lead Auditor; Lakhena Chan as Local Expert and Translator) and the interested parties (communities chosen by the VVB), that is, no person from the Government (PP), Wildlife Alliance (WA), or Wildlife Works Carbon (WWC) was authorized to participate in the meetings with the communities. This was confirmed by AENOR at the beginning of each meeting with the interested parties, as well as the confidentiality of the information provided and free attendance at the meeting. In order not to condition freedom of expression or cause suspicion, no specific data was taken about the attendees (name, signature, etc.), only the characterization of the type of group and its general composition (community, gender, age, religion, relation with the Project). Likewise, after the meetings, no information or opinion collected in the meetings was provided by AENOR to the PP, WA or WWC. Last, note that the same local expert, who is independent, had also worked on the previous verification (carried out by the VVB Aster Global Environmental Solutions, Inc.) so her local expertise was available (sampling rationales, topics and groups of interest, etc.). For those who were not present at the meetings with AENOR, the call posters, distributed by WA (by request of the VVB), contained the contact information of the audit team (email, local telephone number and location of the team on the days of the audit), which was also offered to those attending meetings in case they required adding more information or more confidentiality. No additional information was obtained by this means.

- **Collected in culturally appropriate manner:** The interviews were carried out in the local language by the local female expert, under the supervision of the team leader, under a script of questions based on the Verra normative documents and project documentation (current and previous), adapted for local understanding. The same meeting spaces/schools/temples (not in WA facilities) used for other community meetings were used for these ones. Time for the meeting, when possible, was arranged out of the common labor/pray hours.

- **Representative:** As indicated in the Verification Report, within the project area there are no people living or communities, all of them are on the periphery (a total of 29, of which 21 are priority and permanent participants and 8 receive punctual support from the project – due to their greater distance or better socioeconomic condition). Of the 29 communities in the area of influence of the project, 8 were consulted (28%) during the field visit by the AENOR team, in collective events where a total of 184 people (heads of families) participated, with representation from various ethnic groups,

religions, geographical sectors of the project and a 40-60% balance between men/women. The visit area (project sector) and communities were selected by AENOR, not by WA.

- And without inconsistencies with respect to the rest of the documentary evidence presented by the PP and other stakeholder's testimony (with all the findings closed at the end of the audit, as included in the Annexes of the verification reports).

Therefore, in AENOR's opinion, the information provided by community members was an accurate reflection of community sentiment; given that, if this were not the case at the time of the audit, AENOR would have implemented corrective measures, for example, in the audit procedures (handling meetings) or in the sampling plan during the field audit itself.

3. How it ensured interviews were conducted in a culturally appropriate manner.

The interviews were carried out in the local language by the local female expert, under the supervision of the team leader, under a script of questions based on the Verra normative documents and project documentation (current and previous), adapted for local understanding. The same meeting spaces/schools/temples (not in WA facilities) used for other community meetings were used for these ones. Time for the meeting, when possible, was arranged out of the common labor/pray hours. Therefore, it is assumed that the meetings were carried out in a culturally appropriate manner.

4. Whether and how the VVB evaluated any risks to stakeholders associated with communicating openly with the VVB.

AENOR evaluated this fact with the local expert, who already knew the area and understand the historical context of the country, before carrying out the audit, for this reason, procedures were implemented in order to safeguard the identity of the community stakeholders, who were identified as vulnerable during the evaluation:

A- The meetings were carried out exclusively between the audit team in the field (Carlos Jiménez as Lead Auditor; Lakhena Chan as Local Expert and Translator) and the interested parties (communities chosen by the VVB), that is, no person from the Government (PP), Wildlife Alliance (WA), or Wildlife Works Carbon (WWC) was authorized to participate in the meetings with the communities. This was confirmed by AENOR at the beginning of each meeting with the communities, as well as the confidentiality of the information provided and free attendance at the meeting. In order not to condition freedom of expression or cause suspicion, no specific data was taken about the attendees (name, signature, etc.), only the characterization of the type of group and its general composition (community, gender proportion, average age, religion, relation with the Project). Likewise, after the meetings, no information or opinion collected in the meetings was provided by AENOR to the PP, WA or WWC. Last, note that the same local expert, who is independent, had also worked on the previous verification (carried out by the VVB Aster Global Environmental Solutions, Inc.) so her local expertise was available (sampling rationales, topics and groups of interest, etc.).

B- For those who were not present at the meetings with AENOR, the call posters distributed by WA (by request of the VVB) contained the contact information of the audit team (email, local telephone

number and location of the team on the days of the audit), which was also offered to those attending meetings in case they required adding more information or more confidentiality. No additional information was obtained by this means.

C- Las **two public comments periods** (CCB, 07 June 2022 to 06 July 2022; and SDVista, 22 June 2022 to 21 July 2022) were hold, according to Verra rules.

Thus, in the opinion of AENOR, having evaluated the risks to stakeholders associated with communicating openly with the VVB, the necessary means to mitigate them had been established.

Verra Response

Verra acknowledges the response from AENOR regarding stakeholder communications with the VVB.

Verra received additional responses and commitments from WA in a separate report. This finding is closed.