

Validation Report

Green Resources AS

VALIDATION OF THE CCBA-PROJECT:
KACHUNG FOREST PROJECT:
AFFORESTATION ON DEGRADED LANDS

REPORT No. 1427836

17 June 2011

TÜV SÜD Industrie Service GmbH
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| Report No. | Date of first issue | Revision No. | Revision Date | Certificate No. |
|------------|---------------------|--------------|---------------|-----------------|
| 1427836 | 16 May 2011 | 2 | 17 June 2011 | - |

| Subject: Validation of a CDM Project | | | |
|--|--|--|--|
| Accredited TÜV SÜD Unit: TÜV SÜD Industrie Service GmbH Certification Body "climate and energy" Westendstr. 199 80686 Munich, Germany | TÜV SÜD Contract Partner: TÜV SÜD Industrie Service GmbH Carbon Management Service Westendstr. 199 80686 Munich, Germany | | |
| Project Participant: | Project Site(s): | | |
| Lango Forestry Company Ltd.Green Resources AS | Sub-county Agwata, District Dokolo, Kachung Central Forest Reserve, Republic of Uganda The PDD includes information on geographic boundary. Digital boundary files are provided jointly with this report (submitted as shape-file, in compli- | | |
| | ance with EB 41 item 34). | | |
| Project Title: Kachung Forest Project: Affore | estation on Degraded Lands | | |
| Applied Methodology / Version: CCBS / \ | /ersion No. 2 | | |
| First PDD Version: | Final PDD version: | | |
| Date of issuance: 11 March 2010 | Date of issuance: 10 May 2011 | | |
| Version No.: 01 | Version No.: 04 | | |
| Assessment Team Leader: | Technical Reviewer | | |
| Sebastian Hetsch | Karin Wagner, Martin Seitz | | |
| Assessment Team Members: | Certification Body responsible: | | |
| Hubertus Schimdtke | Thomas Kleiser | | |
| Juan Chang | | | |
| Martin Opitz | | | |
| Summary of the Validation Opinion: The review of the project design documentation and the subsequent follow-up interview have provided TÜV SÜD with sufficient evidence to determine the fulfilment of all stated contents. In our opinion, the project meets all relevant UNFCCC requirements for the CDM Hence TÜV SÜD is recommending the project for registration by the CDM Executive Board letters of approval of all Parties involved will be available before the expiring date of the applied methodology(ies) or the applied methodology version respectively. The review of the project design documentation and the subsequent follow-up interviews of not provide TÜV SÜD with sufficient evidence to determine the fulfilment of all stated critering Hence TÜV SÜD will not recommend the project for registration by the CDM Executive Board and will inform the project participants and the CDM Executive Board on this decision | | | |

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Abbreviations

AFOLU Agriculture, Forestry and other Land Use

AR-AM Approved Methodology for Afforestation and Reforestation

AR-AMS Approved Methodology Small Scale for Afforestation and Reforestation

CCB Climate Community and Biodiversity

CCBA Climate Community and Biodiversity AllianceCCBS Climate Community and Biodiversity Standards

CMP Conference of the Parties serving as the Meeting of the Parties to the Kyoto Pro-

tocol

CR Clarification Request

DNA Designated National AuthorityDOE Designated Operational Entity

EF Emission Factor

EIA Environmental Impact Assessment

ER Emission Reduction

FAR Forward Action Request

FSC Forest Stewardship Council

GHG Greenhouse Gas(es)

GIS Geographic Information System

GPG Good Practice Guidance
GPS Global Positioning System

IPCC Intergovernmental Panel on Climate Change

IRL Information Reference List
IRR Internal Rate of Return

KP Kyoto Protocol

LULUCF Land-Use, Land-Use Change and Forestry

MP Monitoring Plan

NGO Non Governmental Organisation

PDD Project Design Document

PP Project Participant

TÜV SÜD TÜV SÜD Industrie Service GmbH

UNFCCC United Nations Framework Convention on Climate Change

VVM Validation and Verification Manual





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INTRODUCTION

1.1 Objective

The validation objective is an independent assessment by a Third Party of the proposed project activity against all defined criteria as defined by the Climate Biodiversity and Community Alliance (CCBA). In line with the framework for the validation of a CDM project, corresponding tasks are carried by an independent Designated Operational Entity (DOE). TÜV SÜD is a DOE that is accredited by UNFCCC to validate AR-CDM projects. CCBA recognizes this accreditation.

Validation will finally result in a conclusion by the executing DOE whether a project activity is complying with the CCB Standards and whether this project should be submitted for registration with CCBA. The ultimate decision on the registration of a proposed project activity rests with CCBA.

The project activity covered by this validation report was submitted under the project title "Kachung forest project: Afforestation on degraded lands".

For the particular case of this project, a combined validation between CCBS and the Clean Development Mechanism (CDM) was conducted. The CDM Validation Report (No. 1427831) describes the findings of the CDM validation process and demonstrates the compliance of the same project with the CDM. The CDM Validation Report is considered an integral part of the present CCBA audit. The present report is intended to cover only those criteria, in which the CCBA differ and exceed the requirements of CDM.

1.2 Scope

For any CCB project activity the scope is set by:

- CCB standards second edition, as published at <u>www.climate-standards.org</u>
- Technical and methodological guidelines and information for best practice in land use based mitigation projects

In case of a CCB project that is also designed to comply with the requirements of an AR-CDM project or methodology the scope includes furthermore the following:

- The Kyoto Protocol, in particular § 12
- Decision 2/CMP1 and Decision 3/CMP.1 (Marrakech Accords)
- Further COP/MOP decisions with reference to the CDM
- Decisions by the EB published under http://cdm.unfccc.int
- Specific guidance by the EB published under http://cdm.unfccc.int
- ➤ Guidelines for Completing the Project Design Document (CDM-PDD), and the Proposed New Baseline and Monitoring Methodology (CDM-NM)
- > The applied approved AR CDM methodology
- The AR-CDM additionality tool for afforestation / reforestation projects.

The validation is not meant to provide any consulting towards the client. However, stated requests for clarifications and/or corrective actions may provide input for improvement of the project design.

Once TÜV SÜD receives a first PDD version, it is made publicly available on the internet at CCBA's webpage for a global stakeholder consultation process (GSP). In case of a request the

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PDD is revised (under certain conditions the GSP will be repeated) and the final PDD will form the basis for the final evaluation as presented by this report. Information on the first and on the final PDD version is presented on page 2.

The purpose of a validation is to demonstrate compliance or non-compliance of the project with all stated and valid CCBA requirements. Additionally, the purpose of validation is to enable the registration of CCBS projects, which is only a part of the total CCBS project cycle.

2 METHODOLOGY

The project assessment applies standard auditing techniques to assess the correctness of the information provided by the project participants. The assessment is based on the "Clean Development Mechanism Validation and Verification Manual" version 1.02. The work starts with the appointment of the team covering the technical scope(s), technical area(s) and relevant host country experience for evaluating the CDM project activity. Once the project is made available for the stakeholder consultation process, members of the team carry out the desk review, follow-up actions, resolution of issues identified, and finally preparation of the validation report. The prepared validation report and other supporting documents then undergo an internal quality control by the CB "climate and energy" before submission to the CDM-EB.

In order to ensure transparency, assumptions are clear and explicitly stated; the background material is clearly referenced. TÜV SÜD developed methodology-specific checklists and protocol customised for the project. The protocol shows, in a transparent manner, criteria (requirements), the discussion of each criterion by the assessment team, and the results from validating the identified criteria.

The validation protocol serves the following purposes:

- To organize the details and provision of clarifications on the requirements of which a CDM project is expected to meet
- To elucidate how a particular requirement has been validated as well as to document the results of the validation and any adjustments made to the project design document.

The validation protocol consists of three tables. The different columns in these tables are described in the figure below.

| Table 1: CCBA second edition – Validation Checklist | | | | | |
|---|--------------------------------|--|--|---|--|
| CCBA Requirements | Ref. | MoV. | Comments | Draft Concl. | Final Concl. |
| The check-list is organised in sections following the arrangement of the applied PDD version. Each section is then sub-divided. The lowest level constitutes | tion or item is found in | Mea ns of verifi- catio n; Docu ment Re- view: DR; Inter- ter- view: IV; Field | The section is used to elaborate and discuss the checklist question and/or the conformance to the question. It is used to explain the conclusions reached. In some cases subchecklist are applied indicating yes/no decisions on the compliance with the stated criterion. Any Request has to be | Conclusions are presented based on the assessment of the first PDD version. This is either acceptable based on evidence provided (☑), or a Corrective Action Request (CAR) due to non-compliance with the checklist question (See below). Clarification Request (CR) is used when the validation team identified a need for further clarification. Forward Action Request (FAR) to highlight issues | Conclusions are pre- sented in the same man- ner based on the assess- ment of the final PDD version and further documents including assumptions presented in the docu- |

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| checklist the PDD. question / criterion. | | substantiated this column | within | related to project implemen- tation that requires review during the first verification. | mentation. |
|--|--|------------------------------|--------|---|------------|
|--|--|------------------------------|--------|---|------------|

| Table 2: CCBA responses to CAR and CR | | | | | |
|--|---|-----------------------------------|----------------------------|--|--|
| Clarifications and corrective action requests | | Summary of project owner response | Validation team conclusion | | |
| If the conclusions from ta- ble 1 are a Corrective Ac- tion, a Clarification or a Forward action Request, these should be listed in this section. | checklist question number in Table 1 where the issue is | project participants and the | show the final con- | | |

In case of a denial of the project activity more detailed information on this decision will be presented in Table 3. Table 3 is also used for listing of any Forward Action Request.

| Table 3: Unresolved Corrective Action Requests, Clarification Requests, Forward Action Requests (FAR) | | | |
|---|---|--|--|
| CCBA Requirements | Clarifications Request, Corrective Action Request, Forward Action Request | | |
| The checklist is organised in sections following the arrangement of the applied PDD version. Each section is then sub-divided. The lowest level constitutes a checklist question / criterion. | Referenced request if the final conclusion from table 2 resulted in a denial. | | |

The completed validation protocol is enclosed in Annex 1 to this report.

2.1 Appointment of the Assessment Team

According to the technical scopes and experiences in the sectoral or national business environment, TÜV SÜD has composed a project team in accordance with the appointment rules of the TÜV SÜD certification body "climate and energy".

The composition of an assessment team has to be approved by the Certification Body (CB) to assure that the required skills are covered by the team. The CB TÜV SÜD operates the following qualification levels for team members that are assigned by formal appointment rules:

- Assessment Team Leader (ATL);
- Greenhouse Gas Validator (VAL):
- Greenhouse Gas Validator Trainee (T);
- Experts (E);
- > Reviewer (R).

It is required that the sectoral scope(s) and the technical area(s) linked to the methodology and project have to be covered by the assessment team. For this particular project the assessment

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team members are presented in the table below. The respective appointment certificates are attached to this report as annex 3.

Assessment Team:

| Name | Qualification | Coverage of scope | Coverage of technical area | Coverage of financial aspect | Host country experience |
|--------------------|---------------|-------------------|----------------------------|------------------------------|-------------------------|
| Sebastian Hetsch | ATL | | | Ø | Ø |
| Hubertus Schmidtke | VAL | \square | \square | | Ø |
| Juan Chang | VAL | Ø | Ø | | Ø |
| Martin Opitz | Т | \square | | | |

Technical Review:

- Karin Wagner (Technical Reviewer)
- Martin Seitz (covering the relevant Technical Area)

2.2 Review of Documents

The PDD for the GSP was submitted by the PP to the DOE in March 2010. This PDD version and additional background documents related to the project design and baseline were reviewed to verify the correctness, credibility, and interpretation of the presented information. As a further step of the validation process, information provided by the PP was cross-checked with information from other sources (if available). A complete list of all documents and proofs reviewed is attached as Annex 2 to this report.

2.3 Follow-up Interviews

On 13-18 April 2010, TÜV SÜD performed interviews with project stakeholders and physical site inspection to confirm relevant information, and to resolve issues identified in the first document review. The table below provides a list of all persons interviewed in this context.

Persons Interviewed:

| Name | Organisation |
|-----------------|---|
| Jenny Henman | GRAS, Carbon Offset Certificate manager |
| Nick Embden | GRAS, Carbon Certificate Associate |
| Jack Steege | GRAS, Carbon Certificate Associate |
| Ogwal Moses | Community Directive Officer |
| Nanyonjo Prossy | Community Directive Officer BFC Jinga |
| Daphne Ayeikoh | Carbon Certification Officer Uganda |
| Alfred Macapili | Manager Kachung Plantation Project |
| Kizza Simon | FSC Officer Green Resources Uganda |
| Paul Bagenze | Mapping Officer Green Resources Uganda |
| John Begumana | Manager Mapping & Inventory |
| Isaac Kapalaga | MD GRAS Uganda |
| James Odongo | Nursery |
| Okello Okao | Nursery |

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| Sarah Opio | Nursery |
|-------------------|-------------------------------------|
| Ojuka Michael | Nursery |
| Tumusime Angellah | Nursery Supervisor |
| Opio Denis | Rep District Health Officer |
| Nekesa Esther | NFA Sector Manager |
| Dilson Ochen | Chairman LCI Agwata |
| Anthony Oiede | Chairperson Okwor Amuda Parish |
| Obong Geofrey | Chairman LCI Omucocege Amuda Parish |
| Judith Olma | Mob Okor |
| Joe Ocma | Chairman LCI |
| Goeaffary | Mob Apeti "B" |
| Ocen Ga | Agiuna |
| Okello Alex | Community Mobilizer |
| Omara Richard | Community Mobilizer |
| Amere Dick | Chairman LCI Apeti "A" |
| Okello Ronald | Mobilizer Apeti "B" |
| Okmero Phonut | Agengi |
| Obong Patrick | Agengi |
| Ebong Moses | Mobilizer Teamon |
| Odomgo James | Chairman LCI Teamon |
| Amolatar George | Community Mobilizer |
| Onguru Richard | Chairman Apeti "A" |
| Cong Augustine | Community Mobilizer |
| Orech Sam | Chairman LCI Aputi |
| Ogural Moses | Chairman |
| Oluka Milton | Chairman LCI |

2.4 Further cross-check

During the validation process the team made reference to available information related to similar projects or technologies as the proposed CCBS project activity. The documentation was also reviewed against the approved methodology applied to confirm the appropriateness of formulae and correctness of calculations.

2.5 Resolution of Clarification and Corrective Action Requests

The objective of this phase of the validation is to resolve the requests for corrective actions, clarifications, and any other outstanding issues which needed to be clarified for TÜV SÜD's conclusion on the project design. The CARs and CRs raised by TÜV SÜD were resolved during communication between the client and TÜV SÜD. To guarantee the transparency of the validation process the concerns raised and responses that were given are documented in more detail in the validation protocol in Annex 1.

The final PDD version submitted in May 2011 served as the basis for the final assessment presented. Changes are not considered to be significant with respect to the qualification of the project as a CCBS project.

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2.6 Internal Quality Control

Internal quality control is the final step of the validation process and is conducted by the CB "climate and energy" who checks the final documentation, which includes the validation report and annexes. The completion of the quality control indicates that each report submitted has been approved either by the head of the CB or the deputy. In projects where either the Head of the CB or his/her deputy is part of the assessment team, the approval is given by the one not serving on the project team.

After confirmation of the PP the validation opinion and relevant documents are submitted to CCBA.

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3 SUMMARY OF FINDINGS

Each of the CCBS and CDM criteria was assessed based on the project design documentation review, follow-up interviews with relevant stakeholders and the review of the background information

The main findings of the project audit in regard to the project design and CCB Standards compliance are summarized in the following sections:

3.1 General Section

G.1. Original Condition in the Project Area

The project activity is located in the Kachung Central Forest Reserve, in the Republic of Uganda. It includes an eligible planting area of 2,099 ha of degraded grass and shrub land inside a project area of 2,669 ha. The project area is part of the larger project zone of 5,243 ha which is defined by the potential maximum area that could be affected by leakage activities.

A description of the vegetation that characterizes the project site, the current land cover and land use and information and the site's physical features are included to the PDD and sustained with credible evidence (IRL 2, 4, 5, 74) as assessed by the audit team.

TÜV SÜD assessed the boundary in the context of the CDM audit (IRL 74, 75). The project zone is identified by the potential maximum area that could be affected by leakage activities.

The baseline vegetation and its carbon stocks were determined by applying the CDM approved methodology AR-AM0004 Version 04 (IRL 74, 75). The audit team confirms that respective calculations have been carried out correctly.

A description of communities located in the project zone is provided in the PDD, including basic socio-economic and cultural information. Respective information was crosschecked and confirmed during the audit (IRL 2, 4, 6, 60).

Current land use and property rights are presented in the PDD. Respective information, legislation and contracts were reviewed by TÜV SÜD and found to be in compliance with CCBA requirements (IRL 2, 4, 6).

A description of the current biodiversity within the project zone and area on basis of an Ecological Survey and an Environmental Impact assessment is provided in the PDD and in compliance with the standard's requirements. Appropriate methodologies have been applied in the course of the mentioned studies. All species listed in the field inventory were screened against the IUCN's Red list and were not listed (IRL 2, 4, 6).

The project zone contains HCV 2, 5 and 6 as (2) the wetland system being part of the project zone is connected to a larger wetland system of regionally and nationally significant large land-scape level where viable populations of most of all naturally occurring species exist and (5) delivers vital services for the basic need of the local communities for the watering of their cattle. The project area contains traditional worship places of critical importance for the local communities (IRL 2, 6).

G.2. Baseline Projections

The CDM methodology AR-AM0004 version 4 was applied to describe the most likely land-use scenario in the absence of the project. The selected methodology therefore follows the baseline approach from paragraph 22(a) of the CDM A/R modalities and procedures – "Existing or historical, as applicable changes in carbon stocks in the carbon pools within the project boundary" (IRL 2, 4, 6, 15, 19, 74, 75).

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The additionality of the project was assessed using the additionality tool of the CDM: "Tool for the demonstration and assessment of additionality in A/R CDM projects". The analysis include the analysis of land use alternative scenarios an investment analysis and a common practice analysis (IRL 2, 4, 6, 15, 19, 34). TÜV SÜD confirms that the project benefits would not have occurred in the absence of the project; Actions implemented by the project are not required by law.

The baseline carbon stock change was estimated under two strata: 'shrub-grassland' and 'cropland'. The carbon pools considered by the applied methodology are: above-ground and belowground biomass, while the emissions from biomass burning from site preparation are neglected according to the EB 50 Report Annex 21. The analysis was conducted for the project crediting period. The procedure followed in the calculations was explained to the audit team and the appropriateness of parameters taken from GPG IPCC 2003 was discussed. The baseline net GHG removals by sinks are calculated 46,732 tCO₂e (IRL2). TÜV SÜD confirms that emissions of non CO₂ GHG account less than 5% (IRL 2, 77).

The "without project" scenario consists in the continuation of land degradation due to prevailing practices. These leads to the loss of soil fertility and reduced water levels (IRL 2, 6). The continuation of prevailing practices are not in compliance with all applicable legal and regulatory requirements, as the forest reserve is formally designated to forest activities. However reforestation is not enforced, mainly because of the lack of financial resources from the NFA to take control over the area. Gmelina trees which originated from old government plantations are being cut by people encroaching the area.

The continuation of land degradation can lead to further biodiversity loss and reduced environmental services (IRL 2, 6).

G.3. Project Design and Goals

A summary of the project's major climate, community and biodiversity objectives are included in the PDD (IRL 2, 61, 62). Each project activity is described with the expected impacts and relevance in achieving the project's objectives.

The project location containing of the project zone and the project area is presented on maps. The project area is further digitally documented by GIS files (IRL 2, 3). The audit team checked the boundary during the onsite visit.

Both, the project lifetime and the crediting period is defined to be 60 years (two times renewable crediting period of 20 year). An implementation schedule indicating key dates and milestones was provided as required by CCBS (IRL 2).

Natural and human-induced risks and appropriate mitigation measures are presented in the PDD. Fire, diseases and droughts to the forestry plantations were identified as the major risks to the expected climate benefits. In order to mitigate these risks community members are included in trainings on fire fighting. The measures to mitigate the risk of diseases outbreaks of the forest project will affect the woodlots of the communities directly (IRL 2, 4).

Measures to ensure the high conservation value attributes (wetlands/traditional worship places) are foreseen by the project proponents, as required by CCBS. Such measures include buffer zones around the respective areas as well as the ensured further access of the local communities to watering places and worship places (IRL 2, 9).

The PDD includes information on measures to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime, including the promotion of alternative livelihoods initiatives and efficient cooking stoves (IRL 2, 55).

A participatory rural appraisal in line with the requirements of CCBS was conducted in order to optimize community and stakeholder benefits. SOPs have been elaborated serving as regulatory framework for the annual implementation of the ongoing consulting process. TÜV SÜD re-

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viewed respective documentations and cross checked the results through interviews with local communities during the onsite visit (IRL 2, 4, 6, 59).

Communities and stakeholders have been invited and facilitated to submit their comments on the project. This was supported through a PRA team established by the PP, village meetings, questionnaires, national/regional discussions with authorities and using local broadcasting systems. TÜV SÜD reviewed respective information and confirms conformity with CCBS requirements (IRL 2, 78, 79, 80, 82).

A clear process for handling conflicts and grievances is elaborated. However a managing third party or mediator was not contracted at the time of the validation. The audit team post therefore a respective Forward Action Request (see table 3 of annex 1) to provide respective information at verification of the project.

The PDD described financial mechanisms that are adopted to provide adequate flow of funds for project implementation and achieving the climate, community and biodiversity benefits. The audit team reviewed respective information and confirms compliance with the CCBS (IRL 2, 61).

G.4. Management Capacity and Best Practices

The project is developed, implemented and managed by Lango Forestry Company (LFC). Green Resources AS (GRAS) is providing the finance for implementation of the project. GRAS is funded through equity finance, with the shareholders providing primary financing to the development of LFC (IRL 2).

Key technical skills are described and met by the stuffing policy which also includes community engagement. It is shown that GRAS and its management team has sufficient expertise and experience in the putting into action reforestation projects as shown in comparable projects. In case of a lack of know-how collaboration with local and national institutions are provided (IRL 2, 59). TÜV SÜD reviewed respective documents and interviewed employees during the onsite visit and concludes compliance with CCBA requirements.

For employees and members of local communities trainings for woodlot establishment is scheduled. Further training reports on HIV/AIDS have been provided as well as employee handbooks, sustaining that GRAS is offering a broad orientation/ induction program to every employee (IRL 2, 63, 81, 82).

A sound description of the applicable laws and/or regulations covering worker rights and how and by which means the company is fulfilling those has been included to the PDD (IRL 2).

Safety and risk assessment guidelines for work safety are in place. Terms of Reference for conducting a health and safety risk assessment has been provided and found to be in compliance with the requirement of the standards (IRL 2, 59, 83).

The annual report of GRAS demonstrates that financial resources are adequate to implement the project (IRL 2, 61).

G.5. Legal Status and Property Rights

A sound description on relevant national and local laws has been included as well as how compliance with those is achieved through the Project is included to the PDD (IRL 2). Respective information was reviewed by the audit team.

In the context of the CDM project a letter of approval was issued by the host country Uganda and found to be in compliance with the requirements. No further approval is required as the project is taking place in a Central Forest Reserve established by the government for forestry actions (IRL 2, 43, 114).

The project is implemented on governmental lands through a 50 year concession. There have been previous conflicts with the border delineation between local communities and the National

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Forest Authority (NFA). At the moment there is a process of clarification ongoing to solve this conflict among the village Apeti and the NFA (IRL 2).

The project does not require involuntary relocation of people. Existing grazing and cropping activities have been assessed in the course of the leakage assessment during the CDM audit assessment. The mentioned activities will be relocated as a result of the project implementation; in case of perennial crops like banana compensations were paid even though these activities were not allowed on the reserve (IRL 2, 69, 75).

Illegal activities taking place in the project zone are identified and described in the PDD. Such activities took place prior to implementation, including clearing of land for agricultural purposes, grazing activities, charcoal burning and the collection of fuel-wood for commercial purposes. The project will conduct community development programs to reduce the pressure to the project implementation (IRL 2, 56).

The land is legally owned by the government of Uganda given though a 50-year renewable contract to LFC since 1999 (Ref.12). A contract between LFC and GRAS is provided that legally transfers ownership of the issued carbon credits from LFC to GRAS. A Letter of Approval has been exhibited for the CDM project (IRL2, 12, 14, 43, 114). Respective information and contracts was reviewed by TÜV SÜD and found in compliance with CCBS requirements.

3.2 Climate Section

CL.1.Net Positive Climate Impacts

The approved CDM methodology AR-AM0004 version 04 was applied in order to calculate the net change in carbon stocks as a result of project implementation in accordance with the CDM guidance for A/R projects. As indicated in the CDM Validation Report, a total net of 494,049 tCO₂e are expected to be sequestered on the eligible planted area after the 20 years crediting period (IRL 2, 75. 76). Hence, the overall net climate impact is expected to be positive.

Non-CO₂ emissions for the *with* and *without* project scenario have been calculated accounting 0.07% respectively 0.013% of the project's overall GHG emissions reductions and were therefore classed as insignificant. No emissions resulting from the project activities are expected (IRL 2, 77).

The audit team reviewed respective calculation and input data and considers the calculation complete and correct.

No double counting is expected, as the credits will be issued under the UNFCCC CDM and respective registry. As CCBA is not issuing any credits the audit team assumes that no potential double counting will occur.

CL.2. Offsite Climate Impacts ("Leakage")

Potential types of leakage as a result of the project activity, are listed in the PDD: a) livestock grazing b) cropland displacement c) fuelwood use. The corresponding data was compiled based on surveys and calculations, which have been reviewed by the audit team. Therefore, it was verified that the calculations on the expected amounts of the net positive climate are found to be consistent with the requirements of the CCB Standards. In total leakage due to conversion of land to cropland is expected to make an impact and was calculated to be 7,749 tCO₂-e. A detailed review of the calculations is presented in the CDM Validation Report (IRL 2, 52, 53, 54, 75, 76, 84, 85).

Measures to minimize potential leakage are listed in the PDD. The total amount of unmitigated negative offsite climate impacts are discounted from the overall climate benefits as required.

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Non-CO $_2$ GHG emissions are calculated and found to be less than 5% of the projects overall off-site GHG emissions reductions and thus have been neglected (IRL 77). TÜV SÜD reviewed respective calculation regarding leakage and found them correctly applied and in compliance with CCBS requirements.

CL.3. Climate Impact Monitoring

The monitoring plan provided is in compliance with CCBS requirements. The monitoring plan was elaborated in the course of the CDM project and thus is available to the public as posted on the UNFCCC CDM website (IRL 2, 76).

3.3 Community Section

CM1. Net Positive Community Impacts

Impacts on communities resulting from the project activity are addressed by applying appropriated methodologies, Differences between "with" and without" project scenario are discussed in the PDD and supported with respective information and documentation (IRL 2, 60, 62, 63, 64, 68, 69, 78).

A community development plan was developed to implement water reservoirs to improve water security, to promote community woodlots through the provision of seedlings and training to local communities, to improve the level of HIV/AIDS awareness and positive living among project employees and their family members (IRL 63). Under the without project scenario, the continuation of prevailing practices will continue to degrade the land and reduce soil fertility (IRL 2). The audit team reviewed information and confirmed it during the onsite visits, and confirms that CCB Standard requirements are met.

HCVs are not expected to be negatively impacted by the project. Respective buffer zones are expected to protect respective HCV areas (IRL 23).

CM.2. Offsite Stakeholder Impacts

Potential negative offsite stakeholder impacts are identified in the PDD. The major negative impact under the project scenario is the displacement of illegal activities from the project area (cattle, cropland) (IRL 68, 69). The mitigation measures are foreseen in the implementation of the community development plan oriented to provide livelihood initiatives, including among others apiary, fish farming, poultry and agroforestry (IRL 58, 62, 64, 65, 66, 72, 78). In total the project is expected to more likely provide positive impacts rather than negative (IRL 2). TÜV SÜD reviewed respective documentation and assessed the statements in the PDD during the onsite visit. The audit team concludes that respective CCBS requirements are met.

CM.3. Community Impact Monitoring

An initial monitoring plan is provided for community variables as required by the CCB Standards. Standard operational procedures are providing guidance for the stakeholder process (IRL 2, 125, 80).

In order to assess the effectiveness to maintain or enhance the HCVs identified a monitoring of the wetland system will be installed as well as permanent marking of the cultural worship place. Further auditing assessment is expected to be conducted by the FSC Certification planned for the year 2011.

The project developer commits in the PDD to develop a full monitoring plan within twelve month of validation against the Standards and to disseminate this plan and the results of monitoring,

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ensuring that they are made publically available on the internet and are communicated to the communities and other stakeholders (IRL 2, 59, 66, 125).

3.4 Biodiversity Section

B.1. Net Positive Biodiversity Impacts

Impacts on biodiversity resulting from the project activity are addressed by applying appropriated methodologies. Differences between "with" and without" project scenario are discussed in the PDD and supported with respective information and documentation (IRL 2, 6, 13, 26).

The PPs expect a net positive impact on biodiversity through conservation of the wetland areas and enrichment planting of the degraded forest area with indigenous species. The planting of pine and eucalyptus is expected to have a positive impact on degradation and soil fertility, which is sustained by provided scientific evidence (IRL 119, 120). Further it is underlined, that the plantation will help mitigate the pressure on remaining natural forest as they help to meet the growing demands on fuel and construction wood. The audit team reviewed respective documents and information and confirmed the statements during the onsite visit through interviews with stakeholders and observations in the project areas.

HCV are not expected to be impacted negatively by the project activity, due to buffer zones around those areas (IRL 2, 23).

The species planted are: *Pinus caribaea, Eucalyptus grandis, Eucalyptus clones (grandis and camaldulensis (GC) hybrids) and Maesopsis emiini.* Those species are not indicated as invasive species according to the global invasive species database (IRL 121).

Potential negative impact on the water level of pine and eucalyptus plantations are discusse din the PDD. Several scientifically reference state that no such negative impact is expected under the project conditions (IRL 119, 120, 121, 122, 123, 124).

No GMOs are expected be used in the proposed project (IRL 2).

B.2. Offsite Biodiversity Impacts

Offsite biodiversity negative impacts and respective mitigation measures are identified and discussed in the PDD (IRL . The information was assessed by TÜV SÜD and found to be in compliance with CCBS.

It is expected that the promotion of alternative livelihood activities may reduce the pressure caused by the displacement of previous activities, thus reducing biodiversity impacts (IRL 2).

Pollution from the nursery operations will be monitored and ensured through FSC certification (IRL 2).

As a result of the measures above indicated, some of the displaced activities may not be reduced. The displacement of these activities may occur in areas from richer to lower biodiversity. This may indicate that the net biodiversity benefit is positive (IRL 2).

B.3. Biodiversity Impact Monitoring

An initial biodiversity monitoring plan was included to the CCBA PDD. The plan was reviewed by TÜV SÜD and found in compliance with the CCBS. A more detailed plan is expected to be elaborated in collaboration with a professor from Sokoine University of Agriculture, Tanzania (IRL 2, 59, 118), as also requested in FAR 2 (see annex 1, table 3).

Measures to monitor HCVs according to the CCBA are described in the monitoring plan without underlining that those are earmarked for the identified HCVs (see FAR 3 in annex 1, table 3)

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A statement of commitment to developing a full monitoring plan within twelve months of validation against the CCB Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publically available on the internet and are communicated to the communities and other stakeholders is included to the CCBA PDD (IRL 2, 59).

3.5 Gold Level Section

GL.1. Climate Change Adaptation BenefitsNot applied

GL.2. Exceptional Community BenefitsNot applied

GL.3. Exceptional Biodiversity BenefitsNot applied

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Summary of CCBA requirements:

The following table resumes the compliance of the different sections of the CCBA standards:

| Section | required | | | |
|---------|---|-----|--|--|
| Gener | al Section | | | |
| G1. | Original Conditions in the Project Area | Ø | | |
| G2. | Baseline Projections | Ø | | |
| G3. | Project Design and Goals | Ø | | |
| G4. | Management Capacity and Best Practices | Ø | | |
| G5. | Legal Status and Property Rights | Ø | | |
| Clima | te Section | | | |
| CL1. | Net Positive Climate Impacts | Ø | | |
| CL2. | Offsite Climate Impacts ("Leakage") | | | |
| CL3. | Climate Impact Monitoring | Ø | | |
| Comn | Community Section | | | |
| CM1. | Net Positive Community Impacts | Ø | | |
| CM2. | Offsite Community Impacts | Ø | | |
| CM3. | Community Impact Monitoring | Ø | | |
| Biodiv | versity Section | | | |
| B1. | Net Positive Biodiversity Impacts | ☑ | | |
| B2. | Offsite Biodiversity Impacts | | | |
| B3. | Biodiversity Impact Monitoring | | | |
| Gold I | Gold Level Section | | | |
| GL1. | Climate Change Adaptation Benefits | n/a | | |
| GL2. | Exceptional Community Benefits | n/a | | |
| GL3. | Exceptional Biodiversity Benefits | n/a | | |
| | Approved Status | Ø | | |
| | Gold Status | n/a | | |

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4 COMMENTS BY PARTIES, STAKEHOLDERS AND NGOS

The project documents have been published on the CCBA websites. Comments by stake-holders were invited. No comments were received for this project.

The following table presents all key information on this process:

| webpage: http://www.climate-standards.org/projects/index.html | | |
|--|--|--|
| Comment submitted by: No comments received. Issues raised: None | | |
| Response by TÜV SÜD: | | |





5 VALIDATION OPINION

TÜV SÜD performed a validation of the proposed CCBA project activity "Kachung Forest Project: Afforestation on Degraded Lands".

Standard auditing techniques have been used for the validation of the project. A methodology-specific protocol for the project has been prepared to conduct the audit in a transparent and comprehensive manner.

The review of the project design documentation, subsequent follow-up interviews and further verification of references provided TÜV SÜD with sufficient evidence to determine the fulfilment of stated criteria in the protocol. In our opinion, the project meets all relevant requirements of the CCBS second edition. Therefore, TÜV SÜD recommends the project for registration by CCBA. According to the scorecard approach introduced by CCBA (second edition), TÜV SÜD considers the project to comply with approved status.

An analysis as provided by the applied methodology demonstrates that the proposed project activity is not a likely baseline scenario. GHG removals attributable to the project are additional to any that would occur in the absence of the project activity. Given that the project is implemented as designed, the project is likely to achieve the estimated amount of GHG removals as specified within the final PDD version.

In this context it is underlined that from the auditor's perspective a combined audit of CCB Standards and CDM is feasible as CCBA does not foresee the actual issuance of carbon credits. Thus, no immediate risk of double counting is considered to exist. However, TÜV SÜD refrains from liabilities related to ownership of carbon rights and credit issuance.

The validation is based on the information made available to us, as well as the engagement conditions detailed in this report. The validation was performed following the VVM requirements. The single purpose of this report is its use during the registration process as part of the CCBA project cycle.

Munich, 17 June 2011

Munich, 17 June 2011

Thomas Kleiser

Certification Body "climate and energy"
TÜV SÜD Industrie Service GmbH

Sebastian Hetsch Assessment Team Leader TÜV SÜD Industrie Service GmbH



ANNEX 1: VALIDATION PROTOCOL

Table 1: Conformity of project activity and PDD

| | CCBA Requirements | Ref. | MoV* | COMMENTS | Draft Concl | Final Concl |
|--------|---|----------------|-----------|--|----------------|----------------|
| G. Ger | neral Section | | | | | |
| G.1. | Original Conditions in the Project Area | | | | | |
| | Information Are the location of the project and the basic physical parameters (e.g. soil, geology, climate) clearly described? | 2, 4, 5, 74 | DR, IV | The project location and the basic physical parameters (climate, hydrology, topography, geology and soils) are included to the CCBA PDD. | CAR | Ø |
| | | | | The proposed project activity is located in the Kachung Central Forest Reserve, in the Republic of Uganda. Location maps are included to the CCBA PDD. | | |
| | | | | References used for the description of the project area were provided. | | |
| | | | | Corrective Action Request No 1. The hydrology description shall include major watersheds where the project area is located as well as seasonal regimes and how is the wetland influenced by these. Provide further description of the hydrologic conditions of the project area and project zone. | | |
| G.1.2. | Is sufficient information provided concerning types and condition of the vegetation? | 2, 4, 19 | DR, IV | The major vegetation types in the project area are grasslands, shrub lands and disperse trees. A previous governmental reforestation of <i>Gmelina arborea</i> remains near the proposed CCB project. It is indicated that this previous reforested area will be enhanced with native species. | CAR | Ø |
| | | | | The project proponents have rights to the land beyond the project area. A total of 2800 ha is included in the | | |



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| CCBA Requirements | Ref. | MoV* | COMMENTS | Draft Concl | Final Concl |
| | | | permit, from which 2130ha are part of the CDM project. Corrective Action Request No 2. Include a vegetation map of the project area and project zone | | |
| G.1.3. Are boundary of the project and the project zone described in the PDD | 2, 3, 74, 75 | DR, | A map of the project boundary is included to the CCBA PDD. GIS files of the project boundary were provided to the audit team. Corrective Action Request No 3. The permit for the land indicates 2800 ha while the total delineated area in the GIS is 2669ha. Also, the area for the CDM is 2130ha described in the CCB PDD while the GIS indicated 2105 ha. Update the figures on area and ensure consistency. Define the area of the project zone considering the project area and the land within the boundaries of adjacent communities potentially affected by the project. Considering the impact of the plantation on biodiversity in the project area, the ecological conditions shall also be taken into consideration for defining the project zone. | CAR | |
| Climate Information G.1.4. Are the current carbon stocks properly explained, e. g. by using stratification by land-use or vegetation type and methods of carbon calculation (such as biomass plots, formulae, default values) from IPCC 2006 or a more robust and detailed methodology? | 2, 15 | DR, IV, FV | The CDM methodology AR-AM004 version 4 was used for the estimation of carbon stocks. A stratification was conducted following the methodology requirements. Two strata were identified in the baseline: - croplands and - shrub lands and grasslands The carbon stocks were estimated using published equations for tropical forests. Wood density of 0.55 was conservatively assumed. | CAR | Ø |



| | CCBA Requirements | Ref. | MoV* | COMMENTS | Draft Concl | Final Concl |
|--------|--|----------------|-----------|--|----------------|----------------|
| | | | | Corrective Action Request No 4. Include the cropland portion of the project area before the project start (overlapped with the plantation activity in current maps) and update calculations and maps. | | |
| | Is a description included of communities located in the project zone, including basic socio-economic and cultural information that describes the social, economic and cultural diversity within communities (wealth, gender, age, ethnicity etc.), identifying also specific groups such as Indigenous Peoples and describing any community characteristics? | 2, 4, 6, 60 | DR, | Around 6000 people live in 14 villages in the project zone in the Agwata sub-county in Dokolo District, Uganda. The main socioeconomic activities are subsistence agriculture and fishing. The economic condition of the communities in the project is poor with lack of basic conditions such as health. The source of data used for the description of the community was provided. Corrective Action Request No 5. Include information that describes the cultural diversity within communities of the project zone identifying also specific groups such as Indigenous Peoples as well as all economic activities including grazing, fuel wood collection, etc. Include a map of the location of the 14 communities surrounding KFP. Clarify if the project zone includes only these 14 communities. | CAR | Ø |
| G.1.6. | Description of current land use and customary and legal property rights including community property in the project zone, identifying any ongoing or unresolved conflicts or disputes and identifying and describing any disputes over land tenure that were resolved during the last ten years (see also G5). | 2, 4, 6 | DR, IV | The current land use in the communities surrounding the project area is subsistence agriculture and fuel wood collection. Corrective Action Request No 6. Include a description of current land use and customary and legal property rights in the project area. Current description refers only to the surrounding of the project area (the project zone includes both). | CAR | Ø |



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| CCBA Requirements | Ref. | MoV* | COMMENTS | Draft Concl | Final Concl |
| | | | Also address the land use conflict issue due to the project implementation. | | |
| G.1.7. Description of current biodiversity within the project zone (diversity of species and ecosystems) and threats to that biodiversity, using appropriate methodologies, substantiated where possible with appropriate reference material. | | DR; FV, IV | Field assessments were conducted for tree inventory and identification of sites of specific conservation importance in the project area, there is no reference to the project zone. The information provided in the CDM PDD indicates that | CAR | V |
| | | | endangered species have been identified according to an ecological survey of KFP. Four threatened and two endangered species are reported as well as five rare species of flora and fauna. | | |
| | | | A further analysis found that the list of endangered species found in the CDM PDD is not correct, the assessment on endangered species was done based on interviews to local people, which was analyzed with the IUCN Red List and concluded that no endangered species are found in the project area. | | |
| | | | Corrective Action Request No 7. Provide a description of current biodiversity within the project zone (diversity of species and ecosystems) and the method used for it. | | |
| | | | - Clarify if the method described for tree sampling also included inventory of fauna and how is it ensured that the sampling approach is valid for both flora and fauna. | | |
| | | | - Clarify how the inventory year 2008 does anyway represent the situation before project start in 2006. | | |
| | | | - Provide evidence sustaining that no endangered species are found in the project zone based on the most recent lists of endangered species (IUCN, CITES, Uganda red list on endangered species if any) | | |



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| CCBA Requirements | Ref. | MoV* | COMMENTS | Draft Concl | Final Concl |
| | | | - Include the results of the tree sampling to the CCBA PDD clearly indicating the diversity of species. | | |
| Is substantial and appropriate reference material provided? | 2, 4, | DR, IV | The report on the ecological survey was provided to the audit team. | M | Ø |
| G.1.8. An evaluation of whether the project zone includes any of the following High Conservation Values (HCVs) and a description of the qualifying attributes: | 2 | DR, IV | An evaluation of HCVs is included to the CCBA PDD following the CCBA standards criteria. | \square | Ø |
| 1.8.1. Globally, regionally or nationally significant concentrations of biodiversity values:a. protected areas | 2 | DR, IV | The project is located in the Kachung Central Forest Reserve (KCFR) which belongs to the Government of Uganda and leased for 50 years to PPs. | CAR | Ø |
| b. threatened species c. endemic species d. areas that support significant concentrations of a species during any time in their lifecycle (e.g. migrations, feeding grounds, breeding areas). | | | Corrective Action Request No 8. Provide evidence sustaining that the project zone does not contain protected areas neither significant concentrations of species during any time in their life cycle. Include information on the importance of the wetlands for migratory species, feeding grounds, breeding areas, etc. | | |
| 1.8.2. Globally, regionally or nationally significant large landscape- level areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance; | 2 | DR, IV | The project are contains around 400ha of wetlands. There is no information provided in the CCB PDD whether these are nationally significant large landscapelevel areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance. | CAR | Ø |
| | | | Corrective Action Request No 9. - Sustain and provide evidence on large landscapes in the project zone where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance - Sustain and provide evidence whether the wetlands included in the project area are considered nationally | | |



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| CCBA Requirements | Ref. | MoV* | COMMENTS | Draft Concl | Final Concl |
| | | | significant large landscape-level areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance. | | |
| 1.8.3. Threatened or rare ecosystems; | 2 | DR, IV | The project area contains around 400ha of wetlands. There is no information provided in the CCB PDD whether these are threatened or rare ecosystems. There is no information on threatened or rare ecosystems in the project zone. | CAR | V |
| | | | Corrective Action Request No 10. Sustain and provide evidence on threatened or rare ecosystems in the project zone. Sustain and provide evidence whether the wetlands included in the project area are considered threatened or rare ecosystems (i.e literature review. National or global databases used, etc). | | |
| 1.8.4. Areas that provide critical ecosystem services (e.g., hydrological services, erosion control, fire control); | 2 | DR, IV | The project area contains around 400ha of wetlands which certainly provide hydrological services. There is no information on areas that provide critical ecosystem services in the project zone Corrective Action Request No 11. - Sustain and provide evidence on areas that provide critical ecosystem services in the project zone. - Include a description of the function of the wetlands present within the project area providing critical ecosystem services (water). | CAR | ☑ |
| 1.8.5. Areas that are fundamental for meeting the basic needs of local communities (e.g., for essential food, fuel, fodder, medi- cines or building materials without readily available alterna- tives); and | 2 | DR, IV | There are wetlands within the project area that are important for local communities and their cattle. Measures taken include allowing access to local people to these wetlands and establishment of buffer zones to keep the water level | CAR | 7 |



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| CCBA Requirements | Ref. | MoV* | COMMENTS | Draft Concl | Fina Cond |
| | | | Corrective Action Request No 12. Sustain and provide evidence on areas that are fundamental for meeting basic needs of local communities in the project zone. | | |
| 1.8.6. Areas that are critical for the traditional cultural identity of communities (e.g., areas of cultural, ecological, economic or religious significance identified in collaboration with the communities). | 2, 6 | DR, IV | Several sites of interest for local communities were identified. Evidence on the consultation process was provided used to identify these sites. Corrective Action Request No 13. - Sustain and provide evidence on areas that are critical for the traditional cultural identity of communities in the project zone. Current description was taken from the Ecological Survey which considers only the project area. - Include further explanation on the Sites of Specific Conservation Importance to the CCB PDD. | CAR | Ø |
| G.2. Baseline Projections | | | | | |
| G.2.1. Describe the most likely land-use scenario in the absence of the project following IPCC 2006 GL for AFOLU or a more robust and detailed methodology, describing the range of potential land use scenarios and the associated drivers of GHG emissions and justifying why the land-use scenario selected is most likely. | 2, 4, 6, 15, 19, 74, 75 | DR, IV | The AR-AM004 version 4 CDM methodology was applied to describe the most likely land-use scenario in the absence of the project. The selected methodology therefore follows the baseline approach from paragraph 22(a) of the CDM A/R modalities and procedures – "Existing or historical, as applicable changes in carbon stocks in the carbon pools within the project boundary" Evidence on the key factors that influence land use change within the boundary of the proposed A/R CDM / CCBA project activity were provided. | N | Ø |
| G.2.2. Document that project benefits would not have occurred in the absence of the project, explaining how existing laws or regulations would likely affect land use and justifying that the benefits being | 2, 4, 6, 15, 19, | DR, IV | The additionality of the project was assessed using the additionality tool of the CDM: "Tool for the demonstration and assessment of additionality in A/R CDM projects". The analysis include the analysis of land use alternative | CARs in CDM VR | Ø |



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| CCBA Requirements | Ref. | MoV* | COMMENTS | Draft Concl | Final Conc |
| claimed by the project are truly 'additional' and would be unlikely to occur without the project. | 34, 75, 76 | | scenarios an investment analysis and a common practice analysis. The continuation of prevailing practices that cause degradation are not in compliance with all applicable legal and regulatory requirements, however these requirements are not enforced, mainly because of the lack of financial resources from the NFA to take control over the area. Evidence of land use in the project vicinity was provided as well as evidence of financial constraints by the government and NFA for forestry plantations. See CARs in section C.5 of the CDM checklist regarding the additionality assessment of the proposed CCB project and update the CCB PDD considering these. | | |
| G.2.3. Calculate the estimated carbon stock changes associated with the 'without project' reference scenario described above. This requires estimation of carbon stocks for each of the land-use classes of concern and a definition of the carbon pools included, among the classes defined in the IPCC 2006 GL for AFOLU. The timeframe for this analysis can be either the project lifetime (see G3) or the project GHG accounting period, whichever is more appropriate. Estimate the net change in the emissions of non-CO2 GHG emissions such as CH4 and N2O in the 'without project' scenario. Non-CO2 gases must be included if they are likely to account for more than 5% (in terms of CO2-equivalent) of the project's overall GHG impact over each monitoring period | 2 | DR, | The baseline carbon stock change was estimated under two strata: 'shrub-grassland' and 'cropland'. The carbon pools considered by the applied methodology are: above-ground and below-ground biomass, while the emissions from biomass burning from site preparation are neglected according to the EB 50 Report Annex 21. The analysis was conducted for the project crediting period which is considered appropriate. The procedure followed in the calculations was explained to the audit team and the appropriateness of parameters taken from GPG IPCC 2003 was discussed. The CCB standards require the estimation of the net change in the emissions of non-CO ₂ GHG emissions such as CH ₄ and N ₂ O in the 'without project' scenario. | CAR | V |



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| CCBA Requirements | Ref. | MoV* | COMMENTS | Draft Concl | Final Concl |
| | | | Non-CO ₂ gases must be included if they are likely to account for more than 5%. To be discussed onsite. | | |
| | | | Corrective Action Request No 14. Address the non CO ₂ GHG emissions in the 'without project' scenario as required by the CCBA standard. | | |
| | | | (pending CCBA answer to Request for Clarification on this) | | |
| Projects whose activities are designed to avoid GHG emissions (such as those reducing emissions from deforestation and forest degradation (REDD), avoiding conversion of non-forest land, or certain improved forest management projects) must include an analysis of the relevant drivers and rates of deforestation and/or degradation and a description and justification of the approaches, assumptions and data used to perform this analysis. Regional-level estimates can be used at the project's planning stage as long as there is a commitment to evaluate locally-specific carbon stocks and to develop a project-specific spatial analysis of deforestation and/or degradation using an appropriately robust and detailed carbon accounting methodology before the start of the project. | 2 | DR, IV | The proposed project is an afforestation/reforestation project, thus this is not applicable. | N | |
| G.2.4. Describe how the 'without project' reference scenario would affect communities in the project zone, including the impact of likely changes in water, soil and other locally important ecosystem services. | 2, 6 | DR, IV | The "without project" scenario consists in the continuation of land degradation due to prevailing practices. These leads to the loss of soil fertility and reduced water levels. | ☑ | Ø |
| G.2.5. Describe how the 'without project' reference scenario would affect biodiversity in the project zone (e.g., habitat availability, landscape connectivity and threatened species). | 2, 6 | DR, IV | The continuation of prevailing practices would lead to further degradation and with this further biodiversity loss and reduced environmental services. The "Ecological Survey of Kachung Central Forest Project Area" was provided as evidence to the audit team. This document refers only to the project area. | CR | ☑ |



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| | CCBA Requirements | Ref. | MoV* | COMMENTS | Draft Concl | Final Concl |
| | | | | Clarification Request 1. Clarify and sustain with evidence the baseline condition under the 'without project' for biodiversity in the project zone. The table G.2.5 in the CCB PDD does not include a description on how the historical change of natural resources was quantified. Clarify how was the historical change assessed so that the "without project" would affect biodiversity in the project zone. | | |
| G.3 | . Project Design & Goals | | | | | |
| G.3.1. | Provide a summary of the project's major climate, community and biodiversity objectives. | 2, 61, 62 | DR, | The specific objectives of the project are: - To establish and manage forest plantations - To sequester carbon dioxide through forest planting - To promote environmental conservation - To facilitate socio-economic development of the local communities - To develop local infrastructure including roads, health centers, water supply and communication systems. 10% of the carbon revenues generated by the project are dedicated to community development initiatives in the villages surrounding KFP. | ☑ | Image: control of the |
| G.3.2. | Describe each project activity with expected climate, community and biodiversity impacts and its relevance to achieving the project's objectives. | 2, 63 | DR, IV | For the first and second objective, exotic species (Eucalyptus, pine and Maesopsis) will be used. For the second objective, buffer zones and conservation areas will be implemented. For community development, seedlings to promote community woodlots will be supplied, building a health center and promotion of efficient cooking stoves to reduce dependency on fuel-wood. There is a contract with a district development NGO | | Ø |



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| | CCBA Requirements | Ref. | MoV* | COMMENTS | Draft Concl | Final Concl |
| | | | | (esp. HIV control) foundation to conduct the community related activities. | | |
| | | | | The project proponent has control over areas beyond the project area for promoting conservation measures (Wetlands). | | |
| G.3.3. | of the project area(s), where the project activities will occur, of the project zone and of additional surrounding locations that are predicted to be impacted by project activities (e.g. through leakage). | 2 | DR, IV | A map of the project location is included as required by the standards. | CAR | \square |
| | | | | Corrective Action Request No 15. Include a map of the area where leakage is expected to occur as a consequence of the project implementation. | | |
| G.3.4. | Define the project lifetime and GHG accounting period and explain and justify any differences between them. Define an | 2 | DR, | The project crediting period is 20years renewable 3 times accounting for a total of 60 years. | CAR | |
| | implementation schedule, indicating key dates and miles- | | | Corrective Action Request No 16. | | |
| | tones in the project's development. | | | As requested by the standards, define an implementation schedule, indicating key dates and milestones in the project's development. | | |
| G.3.5. | Identify likely natural and human-induced risks to the expected climate, community and biodiversity benefits during the project lifetime and outline measures adopted to mitigate these risks. | 2, 4 | DR, IV | Fire and diseases to the forestry plantations were identified as the major risks to the expected climate benefits. Information on risks to the expected community and biodiversity benefits was not included. | CAR | |
| | | | | Corrective Action Request No 17. | | |
| | | | | Include the likely natural and human-induced risks to the expected community and biodiversity benefits and measures to mitigate these risks. | | |
| G.3.6. | Demonstrate that the project design includes specific measures to ensure the maintenance or enhancement of the high conservation value attributes identified in G1 consistent with the precautionary principle. | 2, 9 | DR, IV | Measures to ensure the high conservation value attributes (wetlands) include allowing communities to continue having access to these sites according to the legislation. | ☑ | ☑ |
| G.3.7. | Describe the measures that will be taken to maintain and enhance the climate, community and biodiversity benefits | 2 | DR, IV | Measures to maintain and enhance the climate, community and biodiversity benefits are described. These in- | Ø | Ø |



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| | CCBA Requirements | Ref. | MoV* | COMMENTS | Draft Concl | Final Conc |
| | beyond the project lifetime. | | | clude promotion of alternative livelihoods initiatives and promotion of efficient cooking stoves. Such effects are not time limited. | | |
| | Document and defend how communities and other stake-holders potentially affected by the project activities have been identified and have been involved in project design through effective consultation, particularly with a view to optimizing community and stakeholder benefits, respecting local customs and values and maintaining high conservation values. Project developers must document stakeholder dialogues and indicate if and how the project proposal was revised based on such input. A plan must be developed to continue communication and consultation between project managers and all community groups about the project and its impacts to facilitate adaptive management throughout the life of the project. | 2, 4, 6, 59 | DR, | A participatory rural appraisal was conducted to collect stakeholders comments. The main steps followed are described in the CCBA PDD. Provide the following documents were provided as evidence: 1. Environmental and socio-economic impact statement report of Kachung Central Forest Reserve, Dokolo District, Enviro-Safety Consult Ltd, March 2008 2. Okullo et al, 2008, Ecological Survey of Kachung Central Forest Project Area, Dokolo District. Makerere University, Faculty of Forestry and Nature Conservation 3. SOPs describing the annual implementation of the consulting process. | ☑ | V |
| G.3.9. | Describe what specific steps have been taken, and communications methods used, to publicize the CCBA public comment period to communities and other stakeholders and to facilitate their submission of comments to CCBA. Project proponents must play an active role in distributing key project documents to affected communities and stakeholders and hold widely publicized information meetings in relevant local or regional languages. | 2, 78, 79, 80, 82 | DR, IV | Specific steps taken include: Introduction of the company to stakeholders, establishing a PRA team, village meetings, questionnaires, national/regional discussions with authorities. 3 announcements on the project were given in the local radio. Clarification Request 2. Provide evidence on the consultation process before project start | CR | Image: section of the content of the |
| G.3.10 | D. Formalize a clear process for handling unresolved conflicts and grievances that arise during project planning and imple- mentation. The project design must include a process for hearing, responding to and resolving community and other stakeholder grievances within a reasonable time period. This grievance process must be publicized to communities and | 2, 78, 79, 80, 82 | DR, IV | Standard Operating Procedures (SOP) were developed by the project proponents to define how any grievances, complaints and conflicts raised by stakeholders shall be handled. The procedure describes the methods of possible com- | CR | FAR |



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| other stakeholders and must be managed by a third party or mediator to prevent any conflict of interest. Project management must attempt to resolve all reasonable grievances raised, and provide a written response to grievances within 30 days. Grievances and project responses must be documented. | | | plaint and conflict resolution. Clarification Request 3. Clarify how any conflicts of interest are managed by a third party or mediator as requested by the standards. | | | |
| | | | Forward Action Request No. 1. At verification, the PPs have to present a third party or mediator in charge of the preventing of any kind of conflict of interest that might occur in the course of the project activity. In order to ensure the promptly agreement with a third party or mediator an officially dated agreement has to be provided at verification. In addition evidence must be provided sustaining that the affected communities and stakeholders where properly informed about the existence of the mediator. Furthermore, it has to be ensured that any conflicts arising between validation and verification are properly documented by the mediator in charge. Respective documentation has to be provided at verification. | | | |
| G.3.11. Demonstrate that financial mechanisms adopted, including projected revenues from emissions reductions and other sources, are likely to provide an adequate flow of funds for project implementation and to achieve the anticipated climate, community and biodiversity benefits. | 2, 61 | DR, IV | The annual report 2008 of Green Resources shows the financial health of the company. A 10% revenue to promote community development is considered. Furthermore, the project establishment was partially covered by international funding and some more 500 ha are expected to receive this funding too. | N | N | |
| G.4. Management Capacity | | | | | | |
| G.4.1. Identify a single project proponent which is responsible for the project's design and implementation. If multiple organizations or individuals are involved in the project's development and implementation the governance structure, roles and responsibilities of each of the organizations or individuals in- | 2 | DR, IV | The project is developed, implemented and managed by Lango Forest Company (LFC). Green Resources AS (GRAS) is providing the finance for implementation of the project. GRAS is funded through equity finance, with the shareholders providing primary financing to the de- | | Ø | |



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| | volved must also be described. | | | velopment of LFC. An organigram clearly identifies the roles and functions of project proponents. | | |
| G.4.2. | Document key technical skills that will be required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills. Document the management team's expertise and prior experience implementing land management projects at the scale of this project. If relevant experience is lacking, the proponents must either demonstrate how other organizations will be partnered with to support the project or have a recruitment strategy to fill the gaps. | 2 | DR, IV | Key technical skills are properly described. The approach to community engagement includes hiring a Community Development Officer in charge of managing relations between the project and local communities and working with local universities. Experience of GRAS is also included to the CCBA PDD | N | Ø |
| G.4.3. | Include a plan to provide orientation and training for the project's employees and relevant people from the communities with an objective of building locally useful skills and knowledge to increase local participation in project implementation. These capacity building efforts should target a wide range of people in the communities, including minority and underrepresented groups. Identify how training will be passed on to new workers when there is staff turnover, so that local capacity will not be lost. | 2, 63, 81, 82 | DR, IV | The project proponents will provide project employees and members of the local communities training on each key stage of woodlot establishment. Corrective Action Request No 18. Provide information on a plan to provide orientation and training for the project's employees and relevant people from the communities. | CAR | Ø |
| G.4.4. | Show that people from the communities will be given an equal opportunity to fill all employment positions (including management) if the job requirements are met. Project proponents must explain how employees will be selected for positions and where relevant, must indicate how local community members, including women and other potentially underrepresented groups, will be given a fair chance to fill positions for which they can be trained. | 2, 59 | DR, IV | Standard Operation Procedures for Employee Selection are developed to ensure participation of people from local communities. SOPs on Employee Selection were provided. They comply with the criteria of the CCBA standard. | Ø | Ø |



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| G.4.5. | Submit a list of all relevant laws and regulations covering worker's rights in the host country. Describe how the project will inform workers about their rights. Provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved. | 2 | DR, IV | Relevant laws and regulations are included. Corrective Action Request No 19. Describe how the project will inform workers about their rights. Provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved. | CAR | Ø |
| G.4.6. | Comprehensively assess situations and occupations that pose a substantial risk to worker safety. A plan must be in place to inform workers of risks and to explain how to minimize such risks. Where worker safety cannot be guaranteed, project proponents must show how the risks will be minimized using best work practices. | 2, 59, 83 | DR, IV | A strategy on worker safety is there. The project proponents indicate that safety and risk assessment guidelines for work safety are in place. Corrective Action Request No 20. Provide a plan how workers are informed of risks and to explain how to minimize such risks. | CAR | Ø |
| G.4.7. | Document the financial health of the implementing organization(s) to demonstrate that financial resources budgeted will be adequate to implement the project. | 2, 61 | DR, IV | The annual report of GRAS demonstrates that financial resources are adequate to implement the project. | \square | Ø |
| G.5. | Legal Status and Property Rights | | | | | |
| G.5.1. | Submit a list of all relevant national and local laws30 and regulations in the host country and all applicable international treaties and agreements. Provide assurance that the project will comply with these and, where relevant, demonstrate how compliance is achieved. | 2 | DR, IV | Corrective Action Request No 21. A list of relevant national and local laws and international agreements is included to the CCBA PDD. Demonstrate how compliance is achieved. | CAR | <u>a</u> |
| G.5.2. | Document that the project has approval from the appropriate authorities, including the established formal and/or traditional authorities customarily required by the communities. | 2 | DR, IV | The project proponents have conducted and EIA as a requirement of the host Country Clarification Request 4. A letter of Approval from the DNA remains to be submitted to the DOE. Clarify if there are any approvals required by traditional established formal and/or traditional | CR | |



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| | | | | authorities customarily required by the communities. | | |
| G.5.3. | Demonstrate with documented consultations and agreements that the project will not encroach uninvited on private property, community property, or government property and has obtained the free, prior, and informed consent of those whose rights will be affected by the project. | 2 | DR, IV | The project is implemented on governmental lands through a 50 year concession. The provided description refers to the previous conflicts with the border delineation between local communities and the National Forest Authority. There is a process of clarification ongoing to solve this conflict among the village APETI and the NFA. | | D |
| G.5.4. | Demonstrate that the project does not require the involuntary relocation of people or of the activities important for the livelihoods and culture of the communities. If any relocation of habitation or activities is undertaken within the terms of an agreement, the project proponents must demonstrate that the agreement was made with the free, prior, and informed consent of those concerned and includes provisions for just and fair compensation. | 2 | DR, IV | Relocation of people does not take place. Grazing and cropping (will be relocated as a result of the project implementation. They are considered in the leakage. There were grace periods to the next harvest; in case of perennial crops like banana also compensations were paid. These previous activities were not allowed on the reserve. Clarification Request 5. Quantify the relocation activities (how many people and extent of activities relocated). | CR | V |
| G.5.5. | Identify any illegal activities that could affect the project's climate, community or biodiversity impacts (e.g., logging) taking place in the project zone and describe how the project will help to reduce these activities so that project benefits are not derived from illegal activities. | 2, 56 | DR, IV | Illegal activities taking place in the reserve prior to implementation of the project included clearing of land for agricultural purposes, grazing activities, charcoal burning and the collection of fuel-wood for commercial purposes. The project will conduct community development programs to reduce the pressure to the project implementation. | ☑ | v |



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| G.5.6. Demonstrate that the project proponents have clear, uncontested title to the carbon rights, or provide legal documentation demonstrating that the project is undertaken on behalf of the carbon owners with their full consent. Where local or national conditions preclude clear title to the carbon rights at the time of validation against the Standards, the project proponents must provide evidence that their ownership of carbon rights is likely to be established before they enter into any transactions concerning the project's carbon assets. | 2, 12, 14 | DR, | The land is legally owned by the government of Uganda given though a 50-year renewable contract to LFC since 1999 (Ref.12) In the PDD there is a recognition mentioned from the Ministry of Water Lands and Environment on the carbon rights from forests are owned by the title holder of the land. A contract between LFC and GRAS is mentioned to be in place that legally transfers ownership of the issued carbon credits from LFC to GRAS. Article 237 (2) (b) of the Constitution of the Republic of Uganda was provided to the audit team (Ref. 14) A memorandum of understanding on the carbon rights is foreseen to be issued together with the LoA. Clarification Request 6. Provide the memorandum of understanding on the carbon rights. Provide the agreement between GRAS and LFC on carbon rights and adapt the PDD accordingly. | CR | |



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| CL. Climate Section | | | | | |
| CL.1. Net Positive Climate Impacts | | | | | |
| CL.1.1. Estimate the net change in carbon stocks due to the project activities using the methods of calculation, formulae and default values of the IPCC 2006 GL for AFOLU or using a more robust and detailed methodology. The net change is equal to carbon stock changes with the project minus carbon stock changes without the project (the latter having been estimated in G2). This estimate must be based on clearly defined and defendable assumptions about how project activities will alter GHG emissions or carbon stocks over the duration of the project or the project GHG accounting period. | 2, 47, 48 | DR, IV | The formula for the estimation of actual changes in living biomass carbon stocks in the project scenario was applied properly. Excel spreadsheets were provided with calculations jointly with yield models for <i>Eucaliptus grandis, Pinus caribaea</i> and <i>Maesopis sp.</i> The formula for the estimation of actual changes in living biomass carbon stocks in the project scenario was applied properly. Excel spreadsheets were provided with calculations jointly with yield models for <i>Eucaliptus grandis, Pinus caribaea</i> and <i>Maesopis sp.</i> The sources of data used, specifically: "Yield of Eucalyptus and Caribbean pine in Uganda, D. Alder et al. 2003" and "Maesopsis eminii – a challenging timber tree species in Uganda – a production model for commercial forestry and small holders, T.Buchholz et al." were provided to the audit team (Ref. 47, 48). Wood density WD for Eucalyptus 0.75 as taken from Ref. 44. This is the upper range for young stands which is considered conservative. The parameter goes up to 0.96 in old stands. WD for Pinus was 0.51 taken from Table 3A.1.9-2 WD for Maesopsis 0.41 taken from Table 3A.1.9-2 - BEF1 for all three were taken from Table 3A.1.10 correctly | CAR | |



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| | | | Corrective Action Request No 22. Root to shoot ratio For Pine 0.32 for conifers 50-150 t dm/ha was used, the correct one is 0.23. for conifers >150 t dm/ha (Table 3A.1,.8) For Eucalyptus 0.35 instead of 0.20 is used For Maesopsis 0.26 instead of 0.27 is used Change parameters in the calculation accordingly. | | |
| CL.1.2. Estimate the net change in the emissions of non-CO2 GHG emissions such as CH4 and N2O in the with and without project scenarios if those gases are likely to account for more than a 5% increase or decrease (in terms of CO2-equivalent) of the project's overall GHG emissions reductions or removals over each monitoring period. | 2, 77 | DR, IV | According to the approved methodology, the increase in emissions of GHG gases resulting from loss of biomass due to conversion of pre-existing vegetation (excluding loss of biomass from herbaceous vegetation) and burning of biomass must be quantified, unless conditions at the site, following guidelines from EB 50, Annex 21, are deemed insignificant. Clarification Request 7. Estimate the net change in the emissions of non-CO2 GHG emissions such as CH4 and N2O in the with and without project scenarios if those gases are likely to account for more than a 5% increase or decrease (in terms of CO2-equivalent) of the project's overall GHG emissions reductions or removals over each monitoring period. | CR | Image: Control of the |
| CL.1.3. Estimate any other GHG emissions resulting from project activities. Emissions sources include, but are not limited to, emissions from biomass burning during site preparation, emissions from fossil fuel combustion, direct emissions from the use of synthetic fertilizers, and emissions from the decomposition of N-fixing species. | 2, 77 | DR, IV | See above | CAR | Ø |



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| CL.1.4. Demonstrate that the net climate impact of the project is positive. The net climate impact of the project is the net change in carbon stocks plus net change in non-CO2 GHGs where appropriate minus any other GHG emissions resulting from project activities minus any likely project-related unmitigated negative offsite climate impacts (see CL2.3). | 2 | DR, IV | The total net anthropogenic GHG emissions reductions were estimated to 740,303 t CO2e for 20 years. Corrective Action Request No 23. Update the results after reviewing calculations (see also sections C.7; D.1 and D.2 of the CDM checklist. | CAR | ☑ |
| CL.1.5. Specify how double counting of GHG emissions reductions or removals will be avoided, particularly for offsets sold on the voluntary market and generated in a country with an emissions cap. | 2 | DR, IV | The GHG emissions reductions will be tradable in the compliance market. | Ø | Ø |
| CL.2.Offsite Climate Impacts ("Leakage") | | | | | |
| mate potential offsite increases in GHGs (increases in emissions or decreases in sequestration) due to project activities. Where relevant, define and justify where leakage is most likely to take place. | 2, 52- 54, 75, 76, 84, 85 | DR, IV | Potential leakage is anticipated from the displacement of grazing, cropland and charcoal production activities. Due to the project implementation, pre-project activities are being displaced out of the project boundary and therefore estimated according to the methodology. A step wise approach was followed. Grazing Data on number of animals were taken from 1999 statistics (7 years before project start). The animal numbers of the whole parishes were taken, not only the animals that were really grazing in the project area. This is very conservative. For the grazing area and the proportion of the grazing time inside the project area information from interviews were used. The biomass production on EGL was calculated to be 3483 t dm/yr. against an annual biomass consumption in the project area of 2538 t cm/yr. Therefore NGL and XGL are zero. | CR, CAR | V V |



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| | | | Clarify the carbon content of cropland if it fits to wet & moist (6.0 t dm/ha) or dry conditions (2.3 tdm/ha). Corrective Action Request No 24. - Adapt the leakage estimation considering the cropland area before the project start. - Fuelwood collection in the baseline is calculated ac- | | |
| | | | cording to the methodology less than the project related potential fuel wood resources. Therefore leakage from displacement of fuel wood collection is set zero. The 2% threshold is to be checked considering the revised calculations. | | |
| CL.2.2. Document how any leakage will be mitigated and estimate the extent to which such impacts will be reduced by these mitigation activities. | 2, 52- 54, 75, 76, 84, 85 | DR, | Measures to mitigate leakage are indicated in the CCBA PDD. Measures to minimize potential leakage from the displacement of grazing, cropland and fuelwood/ Charcoal production activities are described. These measures include: | Image: Control of the | ☑ |
| | | | Provision of fuel-wood from thinning Implementation of an efficient cooking stoves programme for local communities, Promotion of improved land management practices; Promotion of tree-planting through community woodlots, Alternative livelihood programmes such as apiculture and improved agricultural techniques | | |



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| CL.2.3. Subtract any likely project-related unmitigated negative off- site climate impacts from the climate benefits being claimed by the project and demonstrate that this has been included in the evaluation of net climate impact of the project (as calcu- lated in CL1.4). | 2, 52- 54, 75, 76, 84, 85 | DR, IV | The total amount of unmitigated negative offsite climate impacts are discounted from the overall climate benefits. | Ø | Ø |
| CL.2.4. Non-CO2 gases must be included if they are likely to account for more than a 5% increase or decrease (in terms of CO2-equivalent) of the net change calculations (above) of the project's overall off-site GHG emissions reductions or removals over each monitoring period. | 2, 77 | DR, IV | See CAR 7 | CAR | |
| CL.3. Climate Impact Monitoring | | | | | |
| CL.3.1. Develop an initial plan for selecting carbon pools and non- CO2 GHGs to be monitored, and determine the frequency of monitoring. | 2 | DR, IV | The carbon pools are selected. Corrective Action Request No 25. Indicate the carbon pools selected in the AR CDM PDD, and the frequency of monitoring | CAR | ☑ |
| Potential pools include aboveground biomass, litter, dead wood, belowground biomass, wood products, soil carbon and peat. Pools to monitor must include any pools expected to decrease as a result of project activities, including those in the region outside the project boundaries resulting from all types of leakage identified in CL2. | 2 | DR, IV | See CAR above | CAR | Ø |
| A plan must be in place to continue leakage monitoring for at least five years after all activity displacement or other leakage causing activity has taken place. | 2 | DR, IV | A monitoring plan is included in the CDM PDD | Ø | Ø |



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| Individual GHG sources may be considered 'insignificant' and do not have to be accounted for if together such omitted decreases in carbon pools and increases in GHG emissions amount to less than 5% of the total CO2-equivalent benefits generated by the project. | 2, 77 | DR, IV | See CAR 7 | CAR | |
| Non-CO2 gases must be included if they are likely to account for more than 5% (in terms of CO2-equivalent) of the project's overall GHG impact over each monitoring period. | 2, 77 | DR, IV | See CAR 7 | CAR | Ø |
| Direct field measurements using scientifically robust sam- pling must be used to measure more significant elements of the project's carbon stocks. Other data must be suitable to the project site and specific forest type. | 2, 75 | DR, IV | The measurements follow the CDM practices. | Ø | ✓ |
| CL.3.2. Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders. | 2, 75 | DR, IV | The CDM PDD contains the monitoring plan. | Ø | Ø |
| CM. Community Section | | | | | |
| CM.1. Net Positive Community Impacts | | | | | |
| CM.1.1.Use appropriate methodologies to estimate the impacts on communities, including all constituent socio-economic or cultural groups such as indigenous peoples (defined in G1), resulting from planned project activities. A credible estimate of impacts must include changes in community well-being due to project activities and an evaluation of the impacts by the affected groups. This estimate must be based on clearly defined and defendable assumptions about how project activities will alter social and economic well-being41, including potential impacts of changes in natural resources and ecosystem services identified as important by the communities (in- | 2 | DR | As a result of project implementation, employment opportunities will be generated. The project activity employs 12 professional staff, 53 group employees and 264 casual workers. A community development plan was developed to implement water reservoirs to improve water security, to promote community woodlots through the provision of seedlings and training to local communities, to improve the level of HIV/AIDS awareness and positive living among project employees and their family members. | Ø | Ø |



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| cluding water and soil resources), over the duration of the project. The 'with project' scenario must then be compared with the 'without project' scenario of social and economic well-being in the absence of the project (completed in G2). The difference (i.e., the community benefit) must be positive for all community groups. | | | Under the without project scenario, the continuation of prevailing practices will continue to degrade the land and reduce soil fertility. | | |
| CM.1.2.Demonstrate that no High Conservation Values identified in G1.8.4-642 will be negatively affected by the project. | 2 | DR | The wetlands located in the project zone were identified as the major HCV sites. The local communities will continue using these wetlands as the access is granted. Buffer zones that will not be planted will protect the areas of HCV (30 m from wetlands, 10 m from cultural sites. Access is given through wetlands and fire lines. Free access was communicated to the local people during meetings. | D | Image: Control of the |
| CM.2. Offsite Stakeholder Impacts | | | | | |
| CM.2.1.Identify any potential negative offsite stakeholder impacts that the project activities are likely to cause. | 2 | DR | The major negative impact under the project scenario is the displacement of illegal activities from the project area (cattle, cropland). | N | Ø |
| CM.2.2.Describe how the project plans to mitigate these negative offsite social and economic impacts. | 2 | DR, IV | The mitigation measures are foreseen in the implementation of the community development plan oriented to provide livelihood initiatives, including apiary, fish farming, poultry and agroforestry. Other activities oriented to increase community benefits are described. | | V |
| CM.2.3.Demonstrate that the project is not likely to result in net negative impacts on the well-being of other stakeholder groups. | 2 | DR, IV, FV | As described above, the project is more likely to provide positive impacts rather than negative. | | |



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| CM.3. Community Impact Monitoring | | | | | | |
| CM.3.1. Develop an initial plan for selecting community variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project's community development objectives and to anticipated impacts (positive and negative). | 2 | DR | An initial plan is described. This includes the following key variables: 1. Employment 2. Income 3. Demographic and welfare aspects 4. Infrastructure and service provision 5. Health aspects/ profile 6. Cultural profile 7. Education profile 8. Housing profile 9. Food security/ nutrition | ☑ | Ø | |
| CM.3.2.Develop an initial plan for how they will assess the effective- ness of measures used to maintain or enhance High Con- servation Values related to community well-being (G1.8.4-6) present in the project zone. | 2, 80 | DR | A description of future activities to be conducted to assess the effectiveness of measures used to maintain or enhance High Conservation Values related to community well-being. Corrective Action Request No 26. Indicate the key variables that will be considered to assess the effectiveness to maintain or enhance High Conservation Values. This may include biological and physical parameters. | CAR | Ø | |
| CM.3.3.Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders. | 2, 59 | DR | A statement of commitment is included to the CCBA PDD. An SOP on conduction of stakeholder processes was provided. | Ø | Ø | |



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| B. Biodiversity Section | | | | | |
| B.1. Net Positive Biodiversity Impacts | | | | | |
| B.1.1. Use appropriate methodologies to estimate changes in biodiversity as a result of the project in the project zone and in the project lifetime. This estimate must be based on clearly defined and defendable assumptions. The 'with project' scenario should then be compared with the baseline 'without project' biodiversity scenario completed in G2. The difference (i.e., the net biodiversity benefit) must be positive. | 118 | DR | The current description refers to the baseline assessment of biodiversity in the project area. The results indicate a poor biodiversity present in the project area before the project implementation. The measures to protect the wetlands and plantation of native species in the previous plantation. However, according to the Ecological Survey, the plantation will impact biodiversity in the project area. The following quote is from the Ecological Survey: "of the plants and animal species reported by the communities, the research team encountered and enumerated more plants in its plots assessment (Tables 20-22). Unfortunately, this biodiversity will disappear with the introduction of single crop plantation by KAP" "Tree component of the vegetation will be significantly altered through planting of exotic species such as pines and Eucalyptus which the project has already started. This will introduce a monoculture situation and will evidently reduce the population of indigenous trees and associated biodiversity. Since the project is mainly aimed at forest plantation development, this situation is inevitable" It was also found during the onsite visit patches of shrublands which are habitat for several bird species. This will be altered to a monoculture because of the plantation. | CR | |
| | | | Corrective Action Request No 27. | | |



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| | | | | Considering the findings of the onsite visit and the Ecological Survey in which biodiversity in the project area will be impacted by the plantation, sustain and provide evidence that under the project scenario there will be a net biodiversity benefit in the project zone. The methods to estimate changes in biodiversity as a result of the project in the project zone need to be further specified (see also CAR in section G.1.7). | | |
| B.1.2. | Demonstrate that no High Conservation Values identified in G1.8.1-3 will be negatively affected by the project. | 2 | DR | As previously described, measures to protect HCV (wetlands) include a buffer zone of 30 around them. The wetlands are not isolated but continuous habitat corridors. The project design may not affect HCV negatively. However conclusive results shall be provided at the time of verification. | Ø | Image: control of the |
| B.1.3. | Identify all species to be used by the project and show that no known invasive species will be introduced into any area affected by the project and that the population of any invasive species will not increase as a result of the project. | 2 | DR | The species planted are: Pinus caribaea, Eucalyptus grandis, Eucalyptus clones (grandis and camaldulensis (GC) hybrids) and Maesopsis emiini. Those species are indicated as no invasive. Clarification Request 9. Provide references that the species to be used are not considered invasive species (i.e global database of invasive species and invasive species list in Uganda). | CR | Ø |
| B.1.4. | Describe possible adverse effects of non-native species used by the project on the region's environment, including impacts on native species and disease introduction or facilitation. Project proponents must justify any use of non-native species over native species. | 2 | DR | A justification on the use of exotic species considers the high quality of these species compared to native species and the technological knowledge to plant these species. Corrective Action Request No 28. Describe possible adverse effects of non-native species used by the project on the region's environment, including impacts on native species and disease introduction | CAR | Image: control of the |



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| | | | | or facilitation. Sustain the assumptions with reliable sources of information (i.e. scientific publications). | | |
| B.1.5. | Guarantee that no GMOs will be used to generate GHG emissions reductions or removals. | 2 | DR, FV | No GMOs will be used. | \square | Ø |
| B.2. | Offsite Biodiversity Impacts | | | | | |
| B.2.1. | Identify potential negative offsite biodiversity impacts that the project is likely to cause. | 2 | DR | Offsite biodiversity negative impacts are related to the displacement of activities and from the nursery operations (fertilizer application and polythene tubes). | V | Ø |
| B.2.2. | Document how the project plans to mitigate these negative offsite biodiversity impacts. | 2 | DR | It is expected that the promotion of alternative livelihood activities may reduce the pressure caused by the displacement of previous activities, thus reducing biodiversity impacts. Pollution from the nursery operations will be monitored and ensured through FSC certification. | Ø | Ø |
| B.2.3. | Evaluate likely unmitigated negative offsite biodiversity impacts against the biodiversity benefits of the project within the project boundaries. Justify and demonstrate that the net effect of the project on biodiversity is positive. | 2 | DR, IV, FV | As a result of the measures above indicated, some of the displaced activities may not be reduced. The displacement of these activities may occur in areas from richer to lower biodiversity. This may indicate that the net biodiversity benefit is positive. | V | Ø |
| B.3. | Biodiversity Impact Monitoring | | | | | |
| B.3.1. | Develop an initial plan for selecting biodiversity variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project's biodiversity objectives and to anticipated impacts (positive and negative). | 2, 59, 118 | DR | An initial biodiversity monitoring plan was included to the CCBA PDD. A more detailed plan will be elaborated in collaboration with a professor from Sokoine University of Agriculture, Tanzania. Forward Action Request No. 2. | Ø | FAR 2 |
| | | | | <u>ı olwalu Actioli Nequest No. 2.</u> | | l |



| | | | | | | ervice | | |
|-----------------|--|-------|------|--|----------------|----------------|--|--|
| | CCBA Requirements | Ref. | MoV* | COMMENTS | Draft Concl | Final Concl | | |
| | | | | The monitoring plan shall include parameters to monitor biodiversity in the project zone to allow analyzing whether there is a net biodiversity benefit in the project zone. | | | | |
| B.3.2. | Develop an initial plan for assessing the effectiveness of measures used to maintain or enhance High Conservation Values related to globally, regionally or nationally significant biodiversity (G1.8.1-3) present in the project zone. | 2 | DR | HCVs according to the CCBA standard were identified in Section G1.8.1-3). Measures to monitor those are partly described in the monitoring plan without stressing that they are referring to the identified HCVs Forward Action Request No. 3. The monitoring plan shall include a HCV specific section explaining all identified HCVs in the project zone, listing monitoring measures for those as well as a initial plan to | Ø | FAR 3 | | |
| | | | | assess their effectiveness. | | | | |
| B.3.3. | Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders. | 2, 59 | DR | An statement of commitment is included to the CCBA PDD. | Ø | Ø | | |
| Go | ld Level Section | | | | | | | |
| GL ² | I. Climate Change Adaptation Benefits | | | | | | | |
| | | | | N/A | N/A | N/A | | |
| GL | GL2. Exceptional Community Benefits | | | | | | | |
| | | | | N/A | N/A | N/A | | |
| GL: | GL3. Exceptional Biodiversity Benefits | | | | | | | |
| | | | | N/A | N/A | N/A | | |



Table 2: Response to Correctiv Action Requests (CAR) and Clarification Requests (CR)

| Validation Report clarifications and corrective action requests by validation team | Ref. to Table 1 | Summary of project owner response | Validation team con- clusion |
|--|--------------------|--|------------------------------------|
| Corrective Action Request No 1. The hydrology description shall include major watersheds where the project area is located as well as seasonal regimes and how is the wetland influenced by these. Provide further description of the hydrologic conditions of the project area and project zone. | G.1.1 | Project participant: The hydrology description has been updated with the same text as the CDM PDD. Audit team 04 March, 2011: The PDD includes a sound description of the hydrologic conditions of the project area and project zone. Request closed | Ø |
| Corrective Action Request No 2. Include a vegetation map of the project area and project zone | G1.2 | Project participant: A map showing the project area and the project zone is included. Audit team 04 March, 2011: A vegetation map of the project area as well as of the project zone has been included to the PDD. Request closed | ☑ |
| Corrective Action Request No 3. The permit for the land indicates 2800 ha while the total delineated area in the GIS is 2669ha. Also, the area for the CDM is 2130ha described in the CCB PDD while the GIS indicated 2105 ha. Update the figures on area and ensure consistency. Define the area of the project zone considering the project area and the land within the boundaries of adjacent communities potentially affected by the project. Considering the impact of the plantation on biodiversity in the project area, the ecological conditions shall also be taken into consideration for defining the project zone. | G1.3 | Project participant: Project areas updated in line with areas shown in shape files. Project zone description is provided. Audit team 04 March, 2011: Figures on the project area are updated, consistency of CDM PDD, CCBA PDD and shape files is ensured. In total the project area will consist of 2,099 ha of degraded grass and shrub land inside a larger project zone of 2,669 ha. The area of the project zone is defined by the potential maximum area that could be affected by leakage activities. Request closed | A |
| Corrective Action Request No 4. | G.1.4 | Project participant: | |



| Validation Report clarifications and corrective action requests by validation team | Ref. to Table 1 | Summary of project owner response | Validation team con- clusion |
|---|--------------------|--|------------------------------------|
| Include the cropland portion of the project area before the project start (overlapped with the plantation activity in current maps) and update calculations and maps. | | Cropland stratum of project area updated to reflect situation prior to project start. Audit team 04 March, 2011: An Adaptation of the map has been conducted showing the distribution of cropland, shrub & grassland and woodland before project start. Request closed | |
| Corrective Action Request No 5. Include information that describes the cultural diversity within communities of the project zone identifying also specific groups such as Indigenous Peoples as well as all economic activities including grazing, fuel wood collection, etc. Include a map of the location of the 14 communities surrounding KFP. Clarify if the project zone includes only these 14 communities. | G.1.5 | Project participant: Further description of the communities is provided including a brief history of the tribes. Grazing activities and fuelwood collection have been added as economic activities, along with other employment opportunities (public sector and sales and services). A map showing the 14 villages is shown in Figure G.1.2.2. The project zone only includes these 14 villages. Audit team 04 March, 2011: Further Information regarding the local communities has been added. The Population is mainly dominated by the Langi tribe. Main source of income (about 80%) is subsistence farming by crop production, animal rearing, fish farming and beekeeping as well as fuel wood collection for household and sale. A map showing the 14 villages has been included, the existence of not more than 14 villages has been crosschecked. Request closed | ☑ |
| Corrective Action Request No 6. Include a description of current land use and customary and legal property rights in the project area. Current description refers only to the surrounding of the project area (the project zone includes both). Also address the land use conflict issue due to the project implementation. | G.1.6 | Project participant: A description of the project area has been included. The land use conflicts are described in the PDD. Audit team 04 March, 2011: The Project area is part of the Kachung Central Forest Reserve. According to the legal framework of the host country local communities have no claim of legal ownership of forest reserve. Nevertheless the inhabitants of the surrounding communities started encroaching the project zone and project area with subsistence farming activities, fuelwood collection and charcoal burning due to the delayed implementation of the project between 1999, when the permit was first issued to the LFC, and 2006, when GRAS invested in the project. In order to avoid and resolve land use conflicts LFC hired a Community Development | ☑ |



| Validation Report clarifications and corrective action requests by validation team | Ref. to Table 1 | Summary of project owner response | Validation team con- clusion |
|---|--------------------|--|------------------------------------|
| | | Officer. Together with the NFA GRAS supported the amendment of the original land licence from 2.800 to 2.669 ha. The remaining 131 ha had been left to the community members that had proved to be using the land in line with the law. Request closed | |
| Corrective Action Request No 7. Provide a description of current biodiversity within the project zone (diversity of species and ecosystems) and the method used for it. Clarify if the method described for tree sampling also included inventory of fauna and how is it ensured that the sampling approach is valid for both flora and fauna. Clarify how the inventory year 2008 does anyway represent the situation before project start in 2006. Provide evidence sustaining that no endangered species are found in the project zone based on the most recent lists of endangered species (IUCN, CITES, Uganda red list on endangered species if any) Include the results of the tree sampling to the CCBA PDD clearly indicating the diversity of species. | G.1.7 | Project participant: A description of current biodiversity is provided along with the methodology. Observations were made for fauna whilst the flora assessment was being carried out. The inventory of 2008 is deemed suitable to reflect the situation at project start since only 178 ha had been planted when the ecological survey was carried out. Screening of the species listed in the Ecological Survey was carried out – see document "Ecological Survey Screening" (this was submitted for the CDM PDD as well). Results of tree sampling have been included in the PDD. Audit team 04 March, 2011: A description of the current biodiversity within the project zone and area on basis of an Ecological Survey and an Environmental Impact assessment has been included. The respective documents have been provided; the methods applied have been found to be in compliance with the requirements of the CCB Standard. Consultation with the local communities to hear what flora and fauna they had sighted in and around the project area, and a field assessment of flora and fauna through line transects and sample plots have been conducted. At the time of the inventory just 6,7% of the project area has been planted thus it can be assumed that the studies reflect the original situation in the project zone before the project started.' All species listed in the field inventory were screened against the IUCN's Red list and were not listed. They are therefore not classed. This has been crosschecked by the auditing team. The results of the tree sampling have been included to the PDD as required by the Auditing team. Request closed | ✓ |
| Corrective Action Request No 8. Provide evidence sustaining that the project zone does not contain protected areas neither | G.8.1 | Project participant: Evidence is provided. Audit team 04 March, 2011: | |



| Validation Report clarifications and corrective action requests by validation team | Ref. to Table 1 | Summary of project owner response | Validation team con- clusion |
|---|--------------------|---|------------------------------------|
| significant concentrations of species during any time in their life cycle. | | Evidence has been provided and found to be in compliance with the requirements of the CCB Standard. | |
| Include information on the importance of the wetlands for migratory species, feeding grounds, breeding areas, etc. | | The importance of the wetlands for the ecosystem has been included in the PDD. Request closed | |
| Corrective Action Request No 9. Sustain and provide evidence on large landscapes in the project zone where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance Sustain and provide evidence whether the wetlands included in the project area are considered nationally significant large landscapelevel areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance. | G.8.2 | Project participant: A map of the wetland system is included in the PDD to demonstrate that the only a small proportion is included within the project zone. Audit team 04 March, 2011: A map of the wetland system is included in the PDD. No evidence whether the wetland cannot be judged as HCV2 was provided. Even though there is just a small proportion of the total wetland inside the project zone it still is of importance in terms of biodiversity as mentioned in section G1.8.1. Due to the description included in Section G.8.4. the wetlands furthermore seem to have characteristics of a HCV4. Please sustain why the wetlands inside the project zone are not considered as HCV2. Project participant 01 April, 2011 The wetlands are now considered HCV2. Section B.1.2 has been updated to include HCV 1 and HCV2 from section | V |
| | | G1.8.1-3. Audit team 27 April, 2011: The wetlands have been included as HCV2 to the PDD. Request closed | |
| Corrective Action Request No 10. Sustain and provide evidence on threatened or rare ecosystems in the project zone. Sustain and provide evidence whether the wetlands included in the project area are considered threatened or rare ecosystems (i.e literature review. National or global databases used, | G.8.3 | Project participant: Evidence on wetlands is provided. Audit team 04 March, 2011: Evidence has been provided, the wetlands inside the project zone are a small portion of a clear lagers wetland area, thus is cannot be judged a rare ecosystem. Request closed. | ⊴ |



| Validation Report clarifications and corrective action requests by validation team | Ref. to Table 1 | Summary of project owner response | Validation team con- clusion |
|---|--------------------|--|------------------------------------|
| etc). | | | |
| Corrective Action Request No 11. - Sustain and provide evidence on areas that provide critical ecosystem services in the project zone. | G.8.4 | Project participant: Hydrological services have been added as critical ecosystem services and the importance to the communities described. | |
| Include a description of the function of the wet- lands present within the project area providing critical ecosystem services (water). | | Audit team 04 March, 2011: A description of the critical ecosystem service of the wetland for the adjacent villagers as important water source for watering the animals has been included. | |
| | | Further it has been underlined, that excess will be allowed in the future as well as protection measures during the implementation and management of the reforestation in order to minimize any risks for the wetland system. A respective monitoring will be put in place. Request closed | |
| Corrective Action Request No 12. Sustain and provide evidence on areas that are fundamental for meeting basic needs of local communities in the project zone. | G.8.5 | Project participant: The wetlands are considered an area fundamental for meeting basic needs of local communities. Audit team 04 March, 2011: See CAR above. Request closed with response above | ☑ |
| Corrective Action Request No 13. - Sustain and provide evidence on areas that are critical for the traditional cultural identity of communities in the project zone. Current description was taken from the Ecological Survey which considers only the project area. - Include further explanation on the Sites of Specific Conservation Importance to the CCB PDD. | G.8.6 | Project participant: Further detail has been added regarding the sites of special conservation importance. Audit team 04 March, 2011: By stakeholder consultation with the local communities a list of sites of specific conservation importance was identified inside the project zone. Among the sides which are mainly of agricultural importance there is one side of cultural importance as being the worship place for the surrounding communities. Request closed | Ø |
| Corrective Action Request No 14. Address the non CO2 GHG emissions in the 'without project' scenario as required by the CCBA standard. | G.2.3 | Project participant: Awaiting request for clarification. Audit team 04 March, 2011: Pending | ☑ |



| Validation Report clarifications and corrective action requests by validation team | Ref. to Table 1 | Summary of project owner response | Validation team con clusion |
|--|--------------------|---|-----------------------------------|
| | | Project participant: | |
| | | Further justification for assuming without project emissions as zero has been provided. With project emissions have been assumed to be insignificant – further justification provided. | |
| | | Audit team 27 April, 2011: | |
| | | The carbon stock changes of the 'without project' scenario have been calculated following the methodology AR-AM0004/vers. 4 On basis of the identified strata Grass and shrubland and Cropland a total of 46,732 t $\rm CO_2$ -e has been estimated for the crediting period of 20 years. | |
| | | By calculating the GHG emissions from biomass burning it could be shown that the changes of non-CO2 GHG emissions is less than 5% of the project's overall GHG impact and thus can be neglected in compliance with the standard. Request closed | |
| Clarification Request 1. | G.2.5 | Project participant: | |
| - Clarify and sustain with evidence the baseline condition under the 'without project' for biodiver- | | The without project baseline situation is sustained with a reference (Biological Diversity in the Agricultural Sector in Uganda). | |
| sity in the project zone. - The table G.2.5 in the CCB PDD does not in- | | Table G.2.5 was based on PRAs and key informant interviews – title of section 3.1 is relevant for all 3.1 components of the report. | |
| clude a description on how the historical change | | Audit team 04 March, 2011: | ✓ |
| of natural resources was quantified. Clarify how was the historical change assessed so that the "without project" would affect biodiversity in the | | Further description of the effects of the without project scenario on biodiversity has been provided and sustained. Further degradation an depletion of biodiversity within the project area. | |
| project zone. | | The table G.2.5 has been taken from the Ecological Survey Study for KFP, qualitative data has been imposed during PRAs conducted by the Enviro-Safety Consults Ltd. Request closed | |
| Corrective Action Request No 15. | G.3.3 | Project participant: | |
| Include a map of the area where leakage is expected to occur as a consequence of the project implementation. | | A map of the project zone, which covers areas where leakage is expected to occur, is shown in section G.1.2. Reference is also made to section G.1.3. | ☑ |
| | | Audit team 04 March, 2011: A respective map has been included in earlier sections of the PDD. Request closed | |



| Validation Report clarifications and corrective action requests by validation team | Ref. to Table 1 | Summary of project owner response | Validation team con- clusion |
|--|--------------------|---|------------------------------------|
| Corrective Action Request No 16. As requested by the standards, define an implementation schedule, indicating key dates and milestones in the project's development. | G.3.4 | Project participant: An implementation schedule is provided. Audit team 04 March, 2011: An rough overview of key dates and milestones in form of an implementation schedule has been included in earlier sections of the PDD. Request closed | Ø |
| Corrective Action Request No 17. Include the likely natural and human-induced risks to the expected community and biodiversity benefits and measures to mitigate these risks. | G.3.5 | Project participant: Risks to the community and biodiversity benefits are included. Audit team 04 March, 2011: The risk for the plantation, identified as fire, disease and droughts also represent risks for the surrounding communities and their woodlots, their share of 10% of the carbon revenues of the project and the biodiversity of the project zone in general. In order to mitigate these risks community members are included in trainings on fire fighting. The measures to mitigate the risk of diseases outbreaks of the forest project will affect the woodlots of the communities directly. Request closed | Ø |
| Clarification Request 2. Provide evidence on the consultation process before project start. | G.3.9 | Project participant: We are finding it difficult to find any official documentation showing consultations with the communities before project start. However, is this actually a requirement for section G.3.9? Audit team 04 March, 2011: Please provide evidence of the meetings held by the Community Development Officer with the communities in order to full fill the requirements of the standard of section G.3.9. If any issues arose during the consultations provide a list of those and how LFC/GRASS responded on these. Project Participant 01 April, 2011 Evidence of consultation prior to project start is provided. Issues raised from this meeting are included along with LFC's responses. Audit team 27 April, 2011: Hand written minutes of the meetings have been provided including the issues raised | ✓ |



| Validation Report clarifications and corrective action requests by validation team | Ref. to Table 1 | Summary of project owner response | Validation team con- clusion |
|---|--------------------|--|------------------------------------|
| | | and the responses given by LFC. Request closed | |
| Clarification Request 3. Clarify how any conflicts of interest are managed by a third party or mediator as requested by the standards. | G.3.10 | Project participant: - Audit team 04 March, 2011: Please provide evidence of the final confirmation e.g. signed contract and scope of the agreement as soon as available. | |
| | | Project participant 01 April, 2011 The proposal for hiring a third party mediator is included and the third party mediator is expected to be established very shortly. | |
| | | Audit team 27 April, 2011: The PPs couldn't present a signed contract of any agreement with a third party mediator. Nevertheless the PPs assured that they are in negotiation with potential candidates. In order to sustain this process a proposal was presented. | FAR 1 |
| | | Forward Action Request No. 1. At verification the PPs have to present a third party or mediator in charge of the preventing of any kind of conflict of interest that might occur in the course of the project activity. In order to ensure the promptly agreement with a third party or mediator an officially dated agreement has to be provided at verification. In addition evidence must be provided sustaining that the affected communities and stakeholders where properly informed about the existence of the mediator. Furthermore it has to be ensured that any conflicts arising between validation and verification are properly documented by the mediator in charge. Respective documentation has to be provided at verification. | |
| Corrective Action Request No 18. Provide information on a plan to provide orientation and training for the project's employees and relevant people from the communities. | G.4.3 | Project participant: GRAS' orientation and induction programme for employees is described as well as some of the additional initiatives that have been carried out with the local communities. Audit team 04 March, 2011: The Employees handbook as well as training report on HIV/AIDS has been provided, | Ø |



| | | | trie Service |
|---|--------------------|--|---------------------------------|
| Validation Report clarifications and corrective action requests by validation team | Ref. to Table 1 | Summary of project owner response | Validation team con- clusion |
| | | proving that GRAS is offering a broad orientation/ induction program to every employee. Further it is stated, that community members are trained in setting up woodlots. Request closed | |
| Corrective Action Request No 19. Describe how the project will inform workers about their rights. Provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved. | G.4.5 | Project participant: Employees are informed of their rights when they join the company. Assurance is provided that the project meets all applicable laws covering worker rights and compliance is demonstrated. Audit team 04 March, 2011: A sound description of the applicable laws and/or regulations covering worker rights and how and by which means the Company is fulfilling those has been included to the PDD. Request closed | ☑ |
| Corrective Action Request No 20. Provide a plan how workers are informed of risks and to explain how to minimize such risks. | G.4.6 | Project participant: Risk assessment ToR referenced in PDD and provided. Risk assessments integration into the orientation and induction program stated. Audit team 04 March, 2011: Terms of Reference for conducting a health and safety risk assessment has been provided and found to be in compliance with the requirement of the Standard. Request closed | Ø |
| Corrective Action Request No 21. A list of relevant national and local laws and international agreements is included to the CCBA PDD. Demonstrate how compliance is achieved. | G.5.1 | Project participant: Description on how compliance is achieved is included for the most relevant laws and regulations. Audit team 04 March, 2011: A sound description on relevant national and local laws has been included as well as how compliance with those is achieved through the Project. Request closed | Ø |
| Clarification Request 4. A letter of Approval from the DNA remains to be submitted to the DOE. Clarify if there are any approvals required by traditional established formal | G.5.2 | Project participant: Correct LoA still waiting to be received. Audit team 04 March, 2011: In the context of the CDM Project a LoA has been provided to the audit team mean- | Ø |



| Validation Report clarifications and corrective action requests by validation team | Ref. to Table 1 | Summary of project owner response | Validation team con- |
|--|--------------------|---|----------------------|
| and/or traditional authorities customarily required | | while and found to be in compliance with the requirements. | |
| by the communities. | | Please sustain that no further approvals by traditional established formal and/or traditional authorities customarily are required by the communities. | |
| | | Project participant 01 April, 2011 | |
| | | It is confirmed that no further approvals are required. | |
| | | Audit team 27 April, 2011: | |
| | | No further approval is required as the project is taking place in a Central Forest Reserve established by the government for forestry actions. Request closed | |
| Clarification Request 5. Quantify the relocation activities (how many people and extent of activities relocated). | G.5.4 | Project participant: The extent of cropland and grazing activity displacement is included in the PDD. Audit team 04 March, 2011: The extent of cropland and grazing activity displacement has been roughly described in the PDD. Further information has been provided in the course of the CDM Project development. The CDM Project is integral part of the CCBA audit assessment. Request closed | Ø |
| Clarification Request 6. Provide the memorandum of understanding on the carbon rights. Provide the agreement between GRAS and LFC on carbon rights and adapt the PDD accordingly. | G.5.6 | Project participant: The carbon rights will stay with LFC and not be transferred to GRAS. Audit team 04 March, 2011: The memorandum of understanding on the carbon rights could be displaced by the LoA provided in the course of the audit assessment of the CDM project. Nevertheless, the PDD still states, that the carbon credits have been transferred to GRAS. Please adjust the PDD respectively. Project participant 01 April, 2011 PDD amended. Audit team 27 April, 2011: PDD amended as required. Request closed | ✓ |
| Corrective Action Request No 22. - Root to shoot ratio For Pine 0.32 for conifers 50-150 t dm/ha was | CL.1.1 | Project participant: Update with text from the CDM PDD. | |



| Validation Report clarifications and corrective action requests by validation team | Ref. to Table 1 | Summary of project owner response | Validation team con- clusion |
|--|--------------------|---|------------------------------------|
| used, the correct one is 0.23. for conifers >150 t dm/ha (Table 3A.1,.8) For Eucalyptus 0.35 instead of 0.20 is used For Maesopsis 0.26 instead of 0.27 is used Change parameters in the calculation accordingly. | | Audit team 04 March, 2011: The PDD has been updated as required. Request closed | |
| Clarification Request 7. Estimate the net change in the emissions of non-CO2 GHG emissions such as CH4 and N2O in the with and without project scenarios if those gases are likely to account for more than a 5% increase or decrease (in terms of CO2-equivalent) of the project's overall GHG emissions reductions or removals over each monitoring period. | CL.1.2 | Project participant: Awaiting request for clarification. Audit team 04 March, 2011: Pending Project participant: Further justification for assuming without project emissions as zero has been provided. With project emissions have been assumed to be insignificant – further justification provided. Audit team 27 April, 2011: Calculations have been provided demonstrating that non-CO2 GHG emissions account less than 5% of the project's overall GHG emissions. The calculations are in compliance with the Standard. Request closed | Ø |
| Corrective Action Request No 23. Update the results after reviewing calculations (see also sections C.7; D.1 and D.2 of the CDM checklist. | CL.1.4 | Project participant: Update with text and table from the CDM PDD. Audit team 04 March, 2011: The PDD has been updated as required. Request closed | Ø |
| Clarification Request 8. Clarify the carbon content of cropland if it fits to wet & moist (6.0 t dm/ha) or dry conditions (2.3 tdm/ha). | CL.2.1 | Project participant: Carbon content of cropland has been changed to dry conditions. Audit team 04 March, 2011: The carbon content of cropland has been changed to dry conditions. Request closed | Ø |
| Corrective Action Request No 24. - Adapt the leakage estimation considering the | CL.2.1 | Project participant: Text and tables have been updated based on the CDM PDD leakage section. | ☑ |



| Validation Report clarifications and corrective action requests by validation team | Ref. to Table 1 | Summary of project owner response | Validation team con- clusion |
|---|--------------------|--|------------------------------------|
| cropland area before the project start. - Fuelwood collection in the baseline is calculated according to the methodology less than the project related potential fuel wood resources. Therefore leakage from displacement of fuel wood collection is set zero. The 2% threshold is to be checked considering the revised calculations. | | Audit team 04 March, 2011: The PDD has been updated as required. Request closed | |
| Corrective Action Request No 25. Indicate the carbon pools selected in the AR CDM PDD, and the frequency of monitoring | CL.3.1 | Project participant: The table of carbon pools from the methodology has been included and the frequency of monitoring stated. Audit team 04 March, 2011: The PDD has been updated as required. Request closed | |
| Corrective Action Request No 26. Indicate the key variables that will be considered to assess the effectiveness to maintain or enhance High Conservation Values. This may include biological and physical parameters. | CM.3.2 | Project participant: Key variables are mentioned. Audit team 04 March, 2011: The key variables described are the wetlands which are of crucial importance for the watering of the animals as well as cultural worship place which are of cultural importance for the surrounding communities. A monitoring of the wetland system will be installed as well as permanent marking of the cultural worship place. The FSC Certification planed for the year 2011 will conduct further auditing assessment. Request closed | ☑ |
| Corrective Action Request No 27. - Considering the findings of the onsite visit and the Ecological Survey in which biodiversity in the project area will be impacted by the plantation, sustain and provide evidence that under the project scenario there will be a net biodiversity benefit in the project zone. | B.1.1 | Project participant: Further justification of benefits has been provided supported by references. Audit team 04 March, 2011: The PPs expect a net positive impact on Biodiversity through conservation of the wetland areas and enrichment planting of the degraded forest area with indigenous species. The planting of pine and eucalyptus is expected to have a positive impact on degradation and soil fertility which is sustained by provided scientifically evidence. | ☑ |



| Validation Report clarifications and corrective action requests by validation team | Ref. to Table 1 | Summary of project owner response | Validation team con- clusion |
|---|--------------------|--|------------------------------------|
| The methods to estimate changes in biodiversity as a result of the project in the project zone need to be further specified (see also CAR in | | Further it is underlined, that the plantation will help mitigate the pressure on remaining natural forest as they help to meet the growing demands on fuel and construction wood. | |
| section G.1.7). | | The evidence provided (COMPANY WIDE BIODIVERSITY MONITORING GUIDE-LINES FOR GREEN RESOURCES FOREST PLANTATIONS) is a collection of different monitoring methods to estimate potential changes in biodiversity. Please specify which of those will be applied in the context of the Kachung Forest Project. | |
| | | Project participant: | |
| | | The LFC Biodiversity Monitoring Plan is provided. | |
| | | Audit team 27 April, 2011: | |
| | | A project-specific Biodiversity Monitoring Plan has been provided and found to be in compliance with the Standard. Request closed | |
| Clarification Request 9. | B.1.3 | Project participant: | |
| Provide references that the species to be used | | Reference to Global Invasive Species Database added. | — |
| are not considered invasive species (i.e global | | Audit team 04 March, 2011: | |
| database of invasive species and invasive species list in Uganda). | | Reference has been provided as required. Request closed | |
| Corrective Action Request No 28. | B.1.4 | Project participant: | |
| Describe possible adverse effects of non-native | | Possible adverse effects have been further detailed and backed up with references. | |
| species used by the project on the region's envi- | | Audit team 04 March, 2011: | |
| ronment, including impacts on native species and disease introduction or facilitation. Sustain the assumptions with reliable sources of information (i.e. scientific publications). | | A detailed discussion on potential adverse effects has been included. It mainly relates to the critiques towards pine and eucalyptus which are said to have negative impact on the water level. The PPs provided several scientifically references in order to invalidate those. Request closed | Ø |



Table 3: Unresolved Corrective Action Requests, Clarification Requests, Forward Action Requests (FAR)

| CCBA Requirements | Clarifications Request, Corrective Action Request, Forward Action Request |
|---|--|
| G.3.10 Formalize a clear process for handling unresolved conflicts and grievances that arise during project planning and implementation. The project design must include a process for hearing, responding to and resolving community and other stakeholder grievances within a reasonable time period. This grievance process must be publicized to communities and other stakeholders and must be managed by a third party or mediator to prevent any conflict of interest. Project management must attempt to resolve all reasonable grievances raised, and provide a written response to grievances within 30 days. Grievances and project responses must be documented. | Forward Action Request 1: At verification, the PPs have to present a third party or mediator in charge of the preventing of any kind of conflict of interest that might occur in the course of the project activity. In order to ensure the promptly agreement with a third party or mediator an officially dated agreement has to be provided at verification. In addition evidence must be provided sustaining that the affected communities and stakeholders where properly informed about the existence of the mediator. Furthermore, it has to be ensured that the mediator in charge properly documents any conflicts arising between validation and verification. Respective documentation has to be provided at verification. |
| B.3.1 Develop an initial plan for selecting biodiversity variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project's biodiversity objectives and to anticipated impacts (positive and negative). | Forward Action Request 2: The monitoring plan shall include parameters to monitor biodiversity in the project zone to allow analyzing whether there is a net biodiversity benefit in the project zone. |
| B.3.2 Develop an initial plan for assessing the effectiveness of measures used to maintain or enhance High Conservation Values related to globally, regionally or nationally significant biodiversity (G1.8.1-3) present in the project zone. | Forward Action Request 3: The monitoring plan shall include a HCV specific section explaining all identified HCVs in the project zone, listing monitoring measures for those as well as a initial plan to assess their effectiveness. |



Annex 2: Information Reference List

| Ref. No. | Author/Editor/ Issuer | Title, Type of Document | | Date |
|-------------|--------------------------|-------------------------|---|------------------|
| 1. | | Interviewed Persons: | | |
| | | Name | Position, Organisation |] |
| | | 1. Jenny Henman | GRAS, Carbon Offset Certificate manager | |
| | | 2. Nick Embden | GRAS, Carbon Certificate Associate | |
| | | Jack Steege | GRAS, Carbon Certificate Associate | |
| | | 4. Ogwal Moses | Community Directive Officer | |
| | | 5. Nanyonjo Prossy | Community Directive Officer BFC Jinga | |
| | | 6. Daphne Ayeikoh | Carbon Certification Officer Uganda | |
| | | 7. Alfred Macapili | Manager Kachung Plantation Project |] |
| | | 8. Kizza Simon | FSC Officer Green Resources Uganda |] |
| | | 9. Paul Bagenze | Mapping Officer Green Resources Uganda | |
| | | 10. John Begumana | Manager Mapping & Inventory | |
| | Tüv-Süd | 11. Isaac Kapalaga | MD GRAS Uganda | |
| | | 12. James Odongo | Nursery | 40.40 April 0040 |
| | | 13. Okello Okao | Nursery | 13-18 April 2010 |
| | | 14. Sarah Opio | Nursery | |
| | | 15. Ojuka Michael | Nursery | |
| | | 16. Tumusime Angellah | Nursery Supervisor | |
| | | 17. Opio Denis | Rep District Health Officer | |
| | | 18. Nekesa Esther | NFA Sector Manager | |
| | | 19. Dilson Ochen | Chairman LCI Agwata | |
| | | 20. Anthony Oiede | Chairpersonal Okwor Amuda Parish | |
| | | 21. Obong Geofrey | Chairman LCI Omucocege Amuda Parish | |
| | | 22. Judith Olma | Mob Okor | |
| | | 23. Joe Ocma | Chairman LCI | |
| | | 24. Goeaffary | Mob Apeti "B" |] |
| | | 25. Ocen Ga | Agiuna | |
| | | 26. Okello Alex | Community Mobilizer | |
| | | 27. Omara Richard | Community Mobilizer | |



| | | | Industrie Service |
|-------------|---|--|----------------------------|
| Ref. No. | Author/Editor/ Issuer | Title, Type of Document | Date |
| | | 28. Amere Dick Chairman LCI Apeti "A" 29. Okello Ronald Mobilizer Apeti "B" 30. Okmero Phonut Agengi 31. Obong Patrick Agengi 32. Ebong Moses Mobilizer Teamon 33. Odomgo James Chairman LCI Teamon 34. Amolatar George Community Mobilizer 35. Onguru Richard Chairman Apeti "A" 36. Cong Augustine Community Mobilizer 37. Orech Sam Chairman LCI Aputi 38. Ogural Moses Chairman 39. Oluka Milton Chairman LCI | |
| 2. | Green Resources | PDD version 1 2 | 23 Feb 2010 10 May 2011 |
| 3. | Green Resources | GIS files of the project boundary | 2010 |
| 4. | Enviro-Safety Consults Ltd | Environmental and Socio-Economic Impact Statement Report for the proposed A/R- CDM Project activities, Kachung Central Forest Reserve. | 2008 |
| 5. | Karani, P. | Site and species selection for Compensatory timber plantations. A report for the EU. c/o Forestry dept., Kampala; 141pp. | 1998 |
| 6. | Dr John Bosco | KFP Ecological Survey 2 | 2008 |
| 7. | World Agrofor- estry Centre (ICRAF) | Agroforestry tree database. Maesopis eminii. | 2010 |
| 8. | Jacovelli et al. | Tree Planting Guidelines for Uganda. Sawlog Production Grant Scheme (SPGS) | |
| 9. | Uganda Parlia- ment | The National Forestry & Tree Planting Act. | 2003 |
| 10. | Lango Forest Company | Revised Management Plan for Kachung Plantation Project 2005-2010 2 | 2005 |



| | | | industrie Service |
|-------------|---|--|-------------------|
| Ref. No. | Author/Editor/ Issuer | Title, Type of Document | Date |
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| 14. | The Republic of Uganda | Constitution of the Republic of Uganda | 2006 |
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| 16. | National Forest Authority | National Forest Inventory of Uganda, map | 2005 |
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| 18. | NFA | National Forest Authority: Classification of the project area as Woodland | 1990 |
| 19. | Green Resources | Process on the analysis of satellite imagery | 2010 |
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| 41. | Green Resources | Biological asset valuation of Green Resources AS's plantations 2008 for timber prices | 2008 |
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| 43. | DNA Uganda | LoA authorizing Lango Forest Co. Ltd and Green resources AS to participate in the project | 15 Feb 2011 |
| 44. | Green Resources | Field inventories: Field Data Sheet for Kachung Plantation Project Baseline Biomass Measurements | |
| 45. | Tack, C.H. et al. | Uganda Timbers. Ministry of Agriculture and Forestry. The Republic of Uganda. | |
| 46. | IPCC | Global databases LULUCF GPG IPCC 2003. | 2003 |
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Annex 3: Certificates of Appointment





Sebastian Hetsch

accomplishes the requirements according to the guidelines of the Certification Body "climate and energy" of TÜV SÜD Industrie Service GmbH and is appointed as

Assessment Team Leader

for the scope of application:

CDM Projects

The requirements of the QM-Manual and of the attachments of the Certification Body "climate and energy" are binding.

This appointment is valid for 3 years.

Certificate No. CMS-Z-113

Munich, 2010-05-28



Sebastian Hetsch

accomplishes the requirements according to the guidelines of the Certification Body "climate and energy" of TÜV SÜD Industrie Service GmbH and is appointed as

GHG validator

for the following Technical Areas in the Sectoral Scopes:

14 (14.1, 14.2, 14.3, 14.5)

The requirements of the QM-Manual and of the attachments of the Certification Body "climate and energy" are binding.

This appointment is valid for 3 years.

Certificate No. CMS-Z-113

Munich, 2010-05-28

Certification Body "climate and energy"

Welsel



Hubertus Schmidtke

accomplishes the requirements according to the guidelines of the Certification Body "climate and energy" of TÜV SÜD Industrie Service GmbH and is appointed as

GHG validator

for the following Technical Areas in the Sectoral Scopes:

14 (14.1, 14.2, 14.3, 14.5)

The requirements of the QM-Manual and of the attachments of the Certification Body "climate and energy" are binding.

This appointment is valid for 3 years.

Certificate No. CMS-Z-83

Munich, 2010-05-28



Juan Chang

accomplishes the requirements according to the guidelines of the Certification Body "climate and energy" of TÜV SÜD Industrie Service GmbH and is appointed as

CDM validator

for the following Technical Areas in the Sectoral Scopes:

14 (14.1, 14.2, 14.3, 14.5)

The requirements of the QM-Manual and of the attachments of the Certification Body "climate and energy" are binding.

This appointment is valid for 3 years.

Certificate No. CMS-Z-126

Munich, 2010-08-03

Martin Opitz

accomplishes the requirements according to the guidelines of the Certification Body "climate and energy" of TÜV SÜD Industrie Service GmbH and is appointed as

Trainee

for the scope of application:

CDM Projects

The requirements of the QM-Manual and of the attachments of the Certification Body "climate and energy" are binding.

Certificate No. CMS-Z-136

Munich, 2010-12-21



Karin Wagner

accomplishes the requirements according to the guidelines of the Certification Body "climate and energy" of TÜV SÜD Industrie Service GmbH and is appointed as

Technical Reviewer

for the following sectoral scopes:

4, 8, 10

The requirements of the QM-Manual and of the attachments of the Certification Body "climate and energy" are binding.

This appointment is valid for 3 years.

Certificate No. CMS-Z-97

Munich, 2010-05-31



Martin Seitz

accomplishes the requirements according to the guidelines of the Certification Body "climate and energy" of TÜV SÜD Industrie Service GmbH and is appointed as

Trainee

for the scope of application:

CDM Projects

The requirements of the QM-Manual and of the attachments of the Certification Body "climate and energy" are binding.

Certificate No. CMS-Z-137

Munich, 2010-12-21