

## REVIEW FORM

- Reviewer's name: **ALFRED DE JAGER**
- **DOCUMENT TYPE:**

I. General document	II. Standard	III. Procedure	IV. Methodology	V. Support
	✓			

*(Select the type of document with "✓" )*

- **DOCUMENT NAME: II.2. AOCV VALIDATION AND VERIFICATION STANDARD V1.0**
- **VERSION: V1.0**

**COMMENTS:**

No.	Section	Comment	aOCP answer
1	"Both the project validation and the project verification must be conducted by an approved expert panel."	The funding of all this is essential to avoid that you only allow the happy few to define projects. I would expect that you instate grants for indigenous groups and avoid the take over of these projects by multinationals only. Being inclusive is one of the main SDGs.	We required technical experts to verify the calculations and claims done by the aOCP internal team of technical experts prior the registration of projects and the issuance of credits. These need to be professionals capable of judging the scientific rigor of the procedures followed.
2	"FIGURE PROJECT COMPLIANCE REQUIREMENTS"	1. As mentioned earlier I would add inclusiveness and potential to expand here	To keep the quality standards of the VCM minimal compliance requirements need to be met. One of the functions of the aOCP is to certify that the certified projects

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			comply with the integrity principles.
3	“All outside people who are interested to serve on the Panel of Experts must acquire the requisite expertise and certification through our courses, which focus on five competencies:..”	Do these experts have enough understanding of the socio-economic context? Can anybody do a structured interview with the local population to understand how the project is perceived?	The necessary competences are to be developed during the training and tested prior the acceptance as 3 <sup>rd</sup> party validator/verifier.
4	“The Expert Panel (EP) will be made up of a group of extremely knowledgeable experts with the skills required to carry out the validation and verification of integral or sectoral projects, such as initiatives for carbon offset, biodiversity preservation, and water restoration.”	How many? Numbers please. Never use such terminology, you risk to be perceived as arrogant	The number is unlimited and expected to grow as the aOCP expands on more countries.
5	“Evaluate the information supplied by the Project Proponents in the Project papers (e.g., PSF, PMR, etc.) and as required by the Project Standard for accuracy, conservatism, relevance, completeness,	What do you mean by “conservatism”?	Calculations are performed with the perspective to err on the safe side, i.e. choosing to underestimate rather than to overestimate project’s positive impacts.

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	consistency, and transparency”		
6	“Determine if land ownership documentation is valid and reliable”	I mentioned this before, communal land is important, further lots of countries have no functioning cadaster, how are you going to deal with that? Exclude the poor world?	Without sufficient warranty of land use during the project life, we cannot guarantee the permanence of the benefits causing the issuance of credits.
7	“To aOCP Project Activities with similar characteristics, such as a similar application of the selected methodologies and other applied methodological tools, use of technology, time period or region.”	Please list the ‘technologies’, term not defined.	Satellite images, Drone, orthomosaics, SIG, Acoustic sensors, Camera traps,
8	“Base their judgments and results on factual information, and carry out all verification procedures in compliance with aOCP policies”	Judgements you can make on information people give, not paper, verify with (local) people.	All inputs will be considered, including documents, interviews (videos, testimonials), aligned with social safeguards.
9	“Document all assumptions, give sources for background information, and note any modifications to the documentation in the	Impartiality is impossible as soon as somewhere money is flowing.	3 <sup>rd</sup> party verification provides an external opinion on the application of the procedures and the results obtained.

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	verification and certification report in a factual, impartial, and cogent manner;”		
10	“Protect the privacy of all data created or acquired during the verification”	Contradiction with transparency and openness, you have to be more factual, How?	Privacy is safeguarded.  MRV data are open and transparent.
11	“aOCP Validators hired to undertake Project validation for registration of a proposed aOCP Project Activity shall prepare a Project Validation Report (PVR) using the current version of the applicable PVR form/template”	Who hires who?	We have a list of validators/verifiers that have been approved by the aOCP due to their competence and experience in the subject. The aOCP commissions, hires and pays the validator, which enhances impartiality.
12	“The quarterly Satellite Verification Reports (SVR) that will be generated for each aOCP Project will be used by the aOCP Verifiers contracted to carry out the verifications for the emission of ex post credits to provide their technical opinion through a Verification Opinion (VO) that corroborates that the CO2 capture is being	Who does this, who pays for this?	The aOCP pays the 3 <sup>rd</sup> party validators/verifiers, with part of the fees charged from the issuance of credits.

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	<p>adhered to as established in the PSF.”</p>		
13	<p>“To continue issuing ex-ante and ex-post credits, the aOCP Verifiers must confirm that CO2 capture is occurring as specified in the PSF and objectively assess compliance with the Project's goals.”</p>	<p>What do you do when there is a wildfire, a drought or other ‘bad’ luck? I think the essence of the project is to help store carbon, so the intention and potential should be weighted as well, not only the final result.</p>	<p>When an event causes the release of carbon previously captured (reversal) or impedes the future capture and therefore the objectives, this needs to be compensated. Some strategies include use of the carbon credits in the buffer pool, and/or use of parametric insurance to purchase and retire credits from other projects.</p>
14	<p>“Statements of Project Certification must attest to the following aOCP Project Activities: • Comply with aOCP rules and requirements; • Are anticipated to achieve the projected actual and extra reductions/removals of GHG emissions, benefits to the local biodiversity and its habitat, and/or water-related effects, as mentioned in the PSF; • Have implemented safeguards that are</p>	<p>I would rather see proof of stakeholders being interviewed and asked about their perception of the project. A report of a consultant potentially working isolated with some numbers and satellite data is asking for fraud and disconnection.</p>	<p>We ask for evidence in the form of assembly acts, testimonials recorded in video to account for social perception of the project.</p> <p>Credits are issued based on quantitative, reproducible and verifiable hard data.</p>

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	<p>expected to provide protection against negative environmental/social impacts and will not cause any net harm to the environment or/and society; • Depending upon the Project Proponent’s selections in the PSF, may also state that Project Activities are expected to contribute to the achievement of United Nations Sustainable Development Goals (SDGs, preferably those prioritized by the host country), as committed voluntarily in the PSF.”</p>		
15	<p>“The planned aOCP Project Activities will be thoroughly and independently ex-ante assessed for compliance with commitments and targets based on anticipated GHG emission reductions/removals, the benefits to biodiversity, sustainability, and environmental and</p>	<p>Too easy, this should be worked out, example, I reforest a grassland, bingo! I store a lot of CO2, but loose the openness of the landscape, allowing access for typical animals, also my landscape absorbes more heat and becomes more prone for wildfires. Dilemma’s.</p>	<p>We consider that projects should not alter the ecological structure of settled and original ecosystems.</p> <p>Each project is assessed on an individual basis considering suitability of the Project area for development of different ecosystem types.</p> <p>Reforestation is done in degraded forest, grassland restoration in degraded grasslands</p>

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	social dono-net-harm.”		
16	“During the process of global stakeholder consultation, aOCP Validators will evaluate the data provided by the project proponent and the stakeholder comments.”	Define what this means, I would rather focus on ‘local’.	There’s the requirement for a LSC in the PSF, so we consider it prior registering any project.
17	“Follow-up actions (e.g., satellite verification, on-site inspection, interviews by phone, video call or email), including: i. Interviews with landowners or community stakeholders to assess knowledge of project design and implementation; ii. Cross checks between information provided by interviewed personnel (i.e., by checking sources or other interviews) to ensure that no relevant information has been omitted; iii. Satellite verifications of the project area using high resolution imagery.”	Interviews should be the priority, the interviews give the base and are checked against the techniques. Who does the satellite verifications?	Both the aOCP internal team of technical experts and the 3 <sup>rd</sup> party validator/verifies are expected to conduct this diligence at their own criteria, as necessary, basing their decision on the project characteristics and quality of the evidence presented.

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18	“Review of the claims regarding the SDG labels”	The socio-economic component is not at all developed, you have no idea about the SDGs.	Our assessment is based on the indicators for each of the Goals and targets. Which are quantitative.
19	“CRITERIA FOR SITE VISITS”	Consists of what? Counting saplings?	Cuadrantes fijos establecidos en la línea base (biodiversidad y agua) o primer monitoreo (carbono-clústeres, estratos). Se muestreará el 10% del área del Proyecto (estratificado si es necesario o aleatorizado). Dasonetría (DAP, altura), supervivencia, biodiversidad
20	“For proposed aOCP Project Activities, on-site visits and inspections by aOCP Validators are required during project validation if: a) The Project Activity’s estimated average annual GHG emission reductions or net anthropogenic GHG removals are more than 100,000 t CO2...”	per year? per square km?	Per project
21	“If any of the following scenarios arise, the aOCP Validator will issue a Technical	include g) an unforeseen event changed the perspective	In NAT5 credits can be listed, retired, canceled. The last is for guaranteeing not misuse of issued credits.

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	<b>Modification Request (TMR):”</b>		
22	“The aOCP rules and requirements, as well as the data in the registered project documents, such as the Project Submission Form, Project Monitoring Report Form, and other submitted documents, are compared to the reported GHG emission reductions.”	Based on what? Counting stems, measuring organic matter content in soil? Probing the thickness of a peatland?	On the results obtained from applying the methodologies to assess the claimed impacts.
23	“A Certification Statement (CS) is a formal guarantee of emission reductions or removals, benefits to biodiversity, and/or water-related improvements provided by an aOCP Verifier.”	Monitoring network? Again biodiversity is not bound to a location, it is a system.	Biodiversity is considered as an spectrum and is not measured in a point. We acknowledge the interaction of local biodiversity with the ecosystem out of the project area.  Is to be assessed continually as an indicator of changes in the ecosystem.  With the project activities, the influence area is being used by more animal species (indirect influence). Plant species and their relative abundance are directly influenced by the project.
24	“CS shall confirm that the registered aOCP Project	Main issue is continuity, what is the risk of sale, urban	Monitoring period reports the past months, and the Project status at the end of

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	<p><b>Activity, during a specified monitoring period:"</b></p>	<p>expanding, logging, fire? All missing here.</p>	<p>it. Future risks are accounted for in the PSF.</p> <p>Commitment for the land use for all the Project life is part of the safeguards to ensure permanence.</p>
25	<p><b>“aOCP Verifiers shall: [...] Assess and determine whether the implementation and operation of registered aOCP Project Activities, and the steps taken to report GHG emission reductions or net anthropogenic GHG removals, comply with aOCP rules and requirements”</b></p>	<p>What is this?</p>	<p>This refers to GHG removals caused by the Project activities, that would not occur in the absence of the project.</p>
26	<p><b>“f) In addition to the monitoring documentation, the aOCP Verifier shall review: [...]”</b></p>	<p><b>Report the perception of the project in the local community</b></p>	<p>During monitoring, the proponent will provide a list of contacts.</p>
27	<p><b>“b) On-site visit and inspection, involving: [...]ii) Interviews with relevant personnel to determine whether the operational and data collection procedures have been implemented in</b></p>	<p><b>and local stakeholders</b></p>	<p>Pertinence of reach out to stakeholders is assessed on a per-project basis, depending on its characteristics.</p>

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	accordance with the registered PSF and its monitoring plan;”		
28	“iii) A check of the monitoring equipment including calibration performance and observations of monitoring practices against the requirements of the PSF, the applied methodology(ies) and other applied tools;”	i would like to see a list of this	Quitar instrumentos calibrables del Std.
29	“The aOCP Project Validator shall verify and certify that the aOCP Project Activity: [...] e) If the project is water-related, it is likely to achieve the expected benefits in terms of water quality, volume of flow, height of water table, soil retention, as specified in the PSF;”	A project is always water related	Water credits are issued for projects where geologic, topographic, edafologic, conditions are suitable.
30	“[...] f) Is likely to contribute to the achievement of United Nations Sustainable Development Goals (SDGs), and contribute to	As mentioned earlier, there is no socio economic data collected, so you are blind on the SDGs:	Some SDGs include only physical data, that is relevant at a project scale. We consider only SDGs which impact can be assessed and evidenced at project scale.

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	<p><b>achieving a total of [XX] SDGs.”</b></p>		
<p style="text-align: center;"><b>31</b></p>	<p>“The aOCP Verifier shall verify and certify that the registered aOCP Project Activity: [...] b) Has resulted in GHG emission reductions totaling [XXXX] t CO2, which are additional to the reductions that would have occurred in absence of the Project Activity and is in compliance with all applicable aOCP rules and requirements...”</p>	<p style="text-align: center;"><b>per time interval (recurring or not) per surface unit</b></p>	<p>For the monitoring period and for all the Project area.</p>
<p style="text-align: center;"><b>32</b></p>		<p>NOTE Define ecosystem versus environment. The latter is mostly ment as keeping things clean, I think in your ambition level you refer to ecosystem restoration or salvation. As mentioned various times, the socio economic component is not developed, this might be a deliberate choice. If so please remember that it is difficult to fence a forest and also not good for its ecosystem functioning. People of the area concerned need to ‘own’ the project, feel custodian, else they will allow others to break it. The inclusiveness of the projects is also unclear, I mentioned this before. If a bunch of consultants run hin and forth paid by airline companies or the like, your project will be abandoned as soon as the credits are received. Access to poor people should be provided in your</p>	<p>We agree with the conceptual difference between ecosystem and environment, we updated the aOCP documentation accordingly.</p> <p>We require land ownership proof to be sure that the project proponent will be responsible for the project all along the required duration.</p>

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		methodology. Grants, example projects etc can be tricks.	

**DATE:**

**\*the reviewer sent his comments via email on 25/02/2023 without using the recommended format, the comments and aOCP's answers were latter gathered in this document by the aOCP operations team.**

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**Reviewer's name(s) and signature(s)**