

VERIFICATION REPORT

American Carbon Registry

ACR 562: Finite Carbon – Hiawatha Sportsman Club IFM

Reporting Period:

01 March 2021 to 28 February 2022

Prepared for:

Finite Carbon

15 February 2023



AMERICAN CARBON REGISTRY

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Executive Summary

This report describes the verification services provided for the Finite Carbon – Hiawatha Sportsman Club IFM project (“the project”), an Improved Forest Management project located in the Upper Peninsula of Michigan, that was conducted by SCS Global Services. The overall goal of the verification engagement was to review impartially objectively the GHG emission reductions/removal enhancements claimed by the Hiawatha Sportsman Club, the project proponent, for the reporting period from 01 March 2021 to 28 February 2022 against relevant ACR standards and the approved methodology. The verification engagement was carried out through a combination of document review, interviews with relevant personnel and on-site inspections. As part of the verification engagement 5 finding was raised: 0 Non-Conformity Reports, 5 New Information Requests and 0 Observations. These findings are described in Appendix A of this report. The project complies with the verification criteria, and SCS holds no restrictions or uncertainties with respect to the compliance of the project with the verification criteria.

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1 Introduction

1.1 About SCS Global Services

SCS Global Services (SCS) is a global leader in third-party certification, auditing, testing services, and standards. Established as an independent third-party certification firm in 1984, our goal is to recognize the highest levels of performance in environmental protection and social responsibility in the private and public sectors, and to stimulate continuous improvement in sustainable development. In 2012, Scientific Certification Systems, Inc. began doing business as SCS Global Services, communicating its global position with offices and representatives in over 20 countries.

SCS' Greenhouse Gas (GHG) Verification Program has been verifying carbon offsets since 2008 and to date has verified over 290 million tonnes of CO₂e, providing GHG verification services to a wide array of industries including manufacturing, transportation, municipalities, and non-profit organizations. The GHG Verification Program draws upon SCS's established expertise to serve the global carbon market.

1.2 Objectives

The overall goal of third-party verification was to review impartially and objectively the claimed GHG emission reductions/removal enhancements against relevant ACR standards and the approved methodology. SCS independently evaluated the GHG assertion, based on supporting evidence and GHG verification best practice. The objectives of verification were to evaluate

- Reported GHG baseline, project emissions and emission reductions/removal enhancements, leakage assessment, and impermanence risk assessment and mitigation (if applicable).
- Any significant changes to the project procedures or criteria since the last verification.
- Any significant changes in the GHG project's baseline emissions and emission reductions/removal enhancements since the last verification.

SCS reviewed the GHG project plan, GHG assertion, and any additional relevant documentation provided by the client to determine

- That the reported emissions reductions and/or removal enhancements are real.
- Degree of confidence in and completeness of the GHG assertion.
- That project implementation was consistent with the GHG project plan.
- Eligibility for registration on ACR.
- Sources and magnitude of potential errors, omissions, and misrepresentations, including the
 - Inherent risk of material misstatement.
 - Risk that the existing controls of the GHG project would not have prevented or detected a material misstatement.

1.3 Scope

Verification included examination of some or all of the following elements of the GHG project plan:

- Physical infrastructure, activities, technologies, and processes of the GHG project
- GHG SSRs within the project boundary
- Temporal boundary
- Baseline scenarios
- Methods and calculations used to generate estimates of emissions and emission reductions/removal enhancements
- Original underlying data and documentation as relevant and required to evaluate the GHG assertion
- Process information, source identification/counts, and operational details
- Data management systems
- Roles and responsibilities of project participants or client staff
- QA/QC procedures and results
- Processes for and results from uncertainty assessments
- Project-specific conformance to ACR eligibility criteria

SCS examined the reported data, quantification methodologies, calculation spreadsheets or databases, source data, project data management systems, data quality controls in place, measurement and monitoring systems, and records pertaining to emissions quantification. Calculation and error checks, site inspections, interviews with project participants, an iterative risk assessment, sampling plan, and audit checklist were performed to the extent necessary for SCS to develop an understanding of how data are collected, handled, and stored for a specific project.

1.4 Verification Criteria

The verification criteria were comprised of the following:

- ACR Standard, Version 7.0
- Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands, Version 1.3 (“the methodology”)
- Errata & Clarifications v1.3
- ACR Tool for Risk Analysis and Buffer Determination, Version 1.0

1.5 Level of Assurance

The level of assurance was reasonable.

1.6 Treatment of Materiality

For verification purposes, it was required that discrepancies between the emission reductions/removal enhancements claimed by the project proponent and estimated by SCS be immaterial, i.e. be less than ACR's materiality threshold of $\pm 5\%$, as calculated according to the equation in the ACR Standard.

1.7 Summary Description of the Project

The project is located in Upper Peninsula of Michigan on 29,331 acres and is aimed at providing significant recreational, ecological, and environmental benefits, including the maintenance of large blocks of forest and wildlife habitat.

During the initial project validation, the audit team concluded with a reasonable level of assurance that the indicated baseline silviculture prescriptions (clearcutting, Selection thinning, etc.) are recommended by published federal and state guidance. The Common Practice Test has been passed as sufficient data has been provided to demonstrate that the project activity exceeds the common practice in the region.

2 Assessment Process

2.1 Method and Criteria

The verification services were provided through a combination of document review, interviews with relevant personnel and on-site inspections, as discussed in Sections 2.2 through 2.4 of this report. At all times, an assessment was made for conformance to the criteria described in Section 1.2 of this report. As discussed in Section 2.5 of this report, findings were issued to ensure conformance to all requirements.

The audit team created a sampling plan following a proprietary sampling plan template developed by SCS. The audit team identified areas of "residual risk"—those areas where there existed risk of a material misstatement (see Section 1.6 above) that was not prevented or detected by the controls of the project. Sampling and data testing activities were planned to address areas of residual risk. The audit team then created a verification plan that took the sampling plan into account.

2.2 Document Review

The monitoring report (dated 05 December 2022; "MR") were carefully reviewed for conformance to the verification criteria. The following provides a list of additional documentation, provided by project personnel in support of the aforementioned documents, that was reviewed by the audit team.

Documentation Reviewed During the Course of Verification Activities		
Document	File Name	Ref.
GHG Plan	ACR562 GHG Project Plan_FINAL_122821.pdf	1
Monitoring Report	ACR562 RP2 Monitoring Report_signed20230221.pdf	2
Project Boundary	ACR562_RP2.gdb	3
Harvest Boundaries	ACR562_RP2.gdb	4
Harvest Record Detail	HSC_Harvest_Volume_3-1-21-to-2-28-22_wMillTicketInfo.xls	5
Harvest Record Summary	HSC_Harvest_Volume_3-1-21-to-2-28-22_Converted.xls	6
Mill Slips	/HSC_requested_slips_10-28-22/...	7
Jack Establishment Policy	HSC_Jack_Pine.pdf	8
Timber Sale Guidelines	HSC_Sale_guidelines.pdf	9
Responses to harvesting inquiry	memo_11-25-22.pdf	10
ATFS Certificate	Certificate.pdf	11
Calculations Workbook	ACR562 GHGPP Calculations Draft_RP2_112922.xlsx	12

2.3 Interviews

2.3.1 Interviews of Project Personnel

The process used in interviewing project personnel was a process wherein the audit team elicited information from project personnel regarding (1) the work products provided to the audit team in support of the MR; (2) actions undertaken to ensure conformance with various requirements and (3) implementation status of the project activities. The following provides a list of personnel associated with the project proponent who were interviewed.

Interview Log: Individuals Associated with Project Proponent			
Individual	Affiliation	Role	Date(s) Interviewed
Eric Downing	Finite Carbon	VP of Voluntary Projects	Throughout audit
Nathan Hanzelka	Finite Carbon	Associate Director of Project Development	Throughout audit
Jerry Grossman	Grossman Forestry	Consulting Forester	11/25/22

2.4 Site Inspections

No on-site inspections were conducted as part of the verification services.

2.5 Resolution of Findings

Any potential or actual discrepancies identified during the audit process were resolved through the issuance of findings. The types of findings typically issued by SCS during this type of verification engagement are characterized as follows:

- **Non-Conformity Report (NCR):** An NCR signified a discrepancy with respect to a specific requirement. This type of finding could only be closed upon receipt by SCS of evidence indicating that the identified discrepancy had been corrected. Resolution of all open NCRs was a prerequisite for issuance of a verification statement.
- **New Information Request (NIR):** An NIR signified a need for supplementary information in order to determine whether a material discrepancy existed with respect to a specific requirement. Receipt of an NIR did not necessarily indicate that the project was not in compliance with a specific requirement. However, resolution of all open NIRs was a prerequisite for issuance of a verification statement.
- **Observation (OBS):** An OBS indicates an area where immaterial discrepancies exist between the observations, data testing results or professional judgment of the audit team and the information reported or utilized (or the methods used to acquire such information) within the GHG assertion. A root cause analysis and corrective action plan are not required, but highly recommended. Observations are considered by the audit team to be closed upon issuance, and a response to this type of finding is not necessary.

As part of the audit process, 0 NCRs, 5 NIRs and 0 OBS were issued. All findings issued by the audit team during the audit process have been closed. All findings issued during the audit process, and the impetus for the closure of each such finding, are described in Appendix A of this report.

2.6 Techniques and Processes Used to Test the GHG Information and GHG Assertion

The audit team applied various techniques and processes to test the GHG information and the GHG assertion over the course of the audit, listed below:

- Review of project documentation including the GHG Plan (Ref. 1), MR (Ref. 2), spatial information (Refs. 3-4), and calculation workbooks (Ref. 12) to check for project-specific conformance to ACR standard and methodology, appropriateness of methodologies and tools applied, accuracy of GHG information and assertion
- Assessment of any disturbances or forest management activities, including review of timber harvests and harvest removal records, that took place in the project area during the reporting period (Refs. 5-11).
- A review project scenarios.
- Review of the sources, sinks and reservoirs of GHG emissions within the project boundary.
- Assessment of eligibility, additionality, GHG emission reduction assertion and underlying monitoring data to determine if either contained material or immaterial misstatements.

- Assessment of the emission reduction calculation inputs and procedures was performed to review the quantitative analyses undertaken by the Client to convert the inventory data into emission reduction estimates during the reporting period (Ref. 12). This included a re-calculation of project emissions, ERTs, and uncertainty using inventory data as described below in section 3.1 and 3.2.
- Communicate with project personnel and project proponent via interviews, emails, and meetings to gain a better understanding of the project team's methodologies.
- Examine the data management and quality control processes and its controls for sources of potential errors and omissions.
- Review of project documentation including risk assessment and regulatory compliance (Ref. 1-2).

3 Verification Findings

3.1 Results of Quantitative Uncertainty Assessment

SCS devoted a portion of the verification assessment to the review of the manner and propriety by which the project proponent quantified uncertainty associated with the individual GHGs in the project, in addition to the uncertainty of the calculation of GHG emission reductions and removals.

The audit team also calculated the total materiality of the GHG reduction and removal assertion.

3.1.1 Project Uncertainty

The reported total Project Uncertainty (UNC_t) value of 8.2% value reported by the client for 2021 was independently re-quantified by SCS using equation 19 in the methodology. The audit team found this difference reasonable and immaterial.

		SCS Values	Client Values	Difference
Year	RP	UNC _t	UNC _t	
2021	2	8.194%	8.202%	-0.008%

Note: final numbers are rounded for simplicity.

3.1.2 Materiality

The total materiality of the GHG reduction and removal assertion was also calculated for the reporting period.

$$\% \text{ Error} = \frac{(\text{Project Emission Reduction Assertion} - \text{Verifier Emission Reduction Recalculation})}{\text{Verifier Emission Reduction Recalculation}} * 100$$

$$\% \text{ Error} = \frac{(166,603 - 166,604)}{166,604} * 100 = \frac{-1}{166,604} * 100 = -0.0004\%$$

3.2 Analysis of the Quantification Methodologies and Applicable Data Sets and Sources

The audit team re-quantified project emissions, emissions reductions, and project uncertainty from the raw inventory data provided by the client. This process entailed verifying that the methods detailed in the MR were applied as indicated. The team confirmed that the emissions reduction by conducting the following analysis:

- Calculate the change in project carbon stock stored in above and below ground live trees using equation 11 in the methodology
- Calculate the change in project carbon stock stored in above ground dead trees using equation 12 in the methodology
- Calculate any greenhouse gas emission resulting from the implementation of the project in the reporting period using equation 13 in the methodology
- Calculate the change in the project carbon stock and GHG emissions during the reporting period using equation 14 in the methodology.
- Calculate the percentage uncertainty in the combined carbon stocks in the project during the reporting period using equation 18 in the methodology
- Calculate the total project uncertainty (percentage) during the reporting period using equation 19 in the methodology.
- Calculate the net greenhouse gas emission reductions (in metric tons CO₂e) during the reporting period and during each annual vintage using equation 20 in the methodology.

The quantification methodology of Woodall et al (2011) was used to quantify above ground and below ground biomass for live trees. Annualized growth and yield projections were produced in the validated project scenario model. Harvest depletions are handled by removing the harvested volume from the validated yield predictions.

Emission Reductions

The audit team verified that the project personnel used the appropriate emissions factors and GWP's to calculate total emission reductions, which is adherent to the ACR Methodology. The team recalculated the final emission reductions and confirmed that they are without material discrepancy.

The ERT's associated with the first reporting period are reported in the MR and ERT workbook (Refs. 2, 12) and are verified by the verification team are as follows:

- 203,175 tCO₂e (Emissions reductions at the end of the current reporting period without risk buffer deductions)
- 166,603 tCO₂e (Emissions reductions at the end of the current reporting period including risk buffer deductions)
- 36,572 tCO₂e Risk buffer contribution
- 135,450 tCO₂e Leakage deduction

Variances or Deviations

For this reporting period, there were no variances or deviations.

3.3 Basis of Data and Information Supporting the GHG Assertion

The data and information supporting the GHG assertion were based on assumptions, future projections, and actual historical records.

3.4 Leakage Assessment

Section E3 of the GHG Plan states: "The project includes a moderate level of harvest activity within the first reporting period, and moderate levels are projected for future reporting periods, as well. Forest management plans and historical records provided for verification demonstrate no deviation from management plans or from historical trends. The quantification of leakage for the project is limited to market leakage. Where project activities decrease total wood products produced by the project relative to the baseline by 25% or more over the Crediting Period, the market leakage deduction is 40%."

The audit team has also confirmed that the Hiawatha Sportsman Club holds ATFS certification under Grossman Forestry's group certificate.

SCS confirmed that the applicable market leakage factor of 0.4 was applied.

3.5 Risk Assessment

The reported value of the total risk score, as determined based on the risk analysis documented in the PP and MR, was 18%. This risk score was validated the initial RP1 validation and there was no reversal, therefore the risk score of 18% is accepted for RP2 per ACR Standard v7.0 Section 5.A.

Actions Undertaken to Evaluate Whether the Risk Assessment Has Been Conducted Correctly		
Risk Category	Value Selected	Verification Activities
A	4%	Confirmation, through site inspections, that project is not located on public or tribal lands
B	4%	Confirmation, through site inspections, that project is not located on public or tribal lands
C	2%	Confirmation, through site inspections, that the project is not located outside the United States
D	0%	Confirmation, through independent review of documentation, that a conservation easement does not cover entire project area
E	2%	Confirmation, through independent review of documentation, that project is located in a low risk fire region
F	4%	Confirmation, through independent review of documentation, that epidemic disease or infestation is not present within project area, or within 30 mile radius of project area
G	0%	Confirmation, through site inspections, that project is not a wetland project or a forest project where more than 60% of the project area is not a forested wetland
H	2%	Confirmation that default value has been applied in the risk assessment calculation

4 Conclusion

The audit team asserts, with no qualifications or limitations, that the quantification of GHG emission reductions and/or removal enhancements, as reported in the MR, conforms to the verification criteria and is without material discrepancy.

On the basis of the information made available SCS and the analyses completed during the verification, SCS was able to reach a positive opinion, with a reasonable level of assurance, that the emission reductions represented by the Project Proponent during the reporting periods from 01 March 2021 to 28 February 2022 are free from material misstatement and in conformance with the assessment criteria. Additionally, SCS has reached the conclusion, with a reasonable level of assurance, that the Project Proponent has maintained regulatory compliance during the reporting period.

The following provides a summary of the ERT issuance for the current Reporting Period with the Leakage

Gross Removals and Reductions in Metric Tons (tCO₂e)
--

deduction included and the Buffer deductions excluded (Gross ERTs):

Reporting Period	Vintage	Start Date	End Date	Gross GHG Emission Removals (tCO ₂ e)	Gross GHG Emission Reductions (tCO ₂ e)
2	2021	01 March 2021	31 December 2021	27,742	142,591
2	2022	1 January 2022	28 February 2022	5,349	27,493
TOTAL				33,091	170,084

Net Combined Reductions/Removals and Buffer Credits (tCO ₂ e)					
Reporting Period	Vintage	Start Date	End Date	Net Combined GHG Emission Removals/Reductions (tCO ₂ e)	Quantity of Buffer Credits (tCO ₂ e)
2	2021	01 March 2021	31 December 2021	139,673	30,660
2	2022	1 January 2022	28 February 2022	26,930	5,912
TOTAL				166,603	36,572

Lead Auditor Approval	 Alexander Pancoast, 15 February 2023
Internal Reviewer Approval	 Alexa Dugan, 15 February 2023

Appendix A: List of Findings

Please see Section 2.5 above for a description of the findings issuance process and the categories of findings issued. It should be noted that all language under “Project Personnel Response” is a verbatim transcription of responses provided to the findings by project personnel.

NIR 1 Dated 17 Nov 2022

Standard Reference: ACR Standard v7.0 Ch3, ACR IFM Methodology v1.3 Section D6

Document Reference: Hiawatha AmTreeFarm Certificate.pdf,
ACR562 GHG Project Plan Draft_111521.pdf

Finding: Section D6 in the “Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands v1.3” states:

“There may be no leakage beyond de minimis levels through activity shifting to other lands owned, or under management control, by the timber rights owner.

If the project decreases wood product production by >5% relative to the baseline then the Project Proponent and all associated land owners must demonstrate that there is no leakage within their operations – i.e., on other lands they manage/operate outside the bounds of the ACR carbon project. Such a demonstration must include one of the following:

- Historical records covering all Project Proponent ownership trends in harvest volumes paired with records from the with-project time period showing no deviation from historical trends over most recent 10-year average; or
- Forest management plans prepared ≥24 months prior to the start of the project showing harvest plans on all owned/managed lands paired with records from the with-project time period showing no deviation from management plans; or
- Entity-wide management certification that requires sustainable practices (programs can include FSC, SFI, or ATFS). Management certification must cover all entity owned lands with active timber management programs.”

ACR562 GHG Project Plan Draft_111521.pdf states:

“Forest management plans and historical records provided for verification demonstrate no deviation from management plans or from historical trends.”

However, no such documentation has been provided.

An American Tree Farm Certificate has been provided, Hiawatha AmTreeFarm Certificate.pdf, however the expiration date shows 16 April 2021 while the reporting period begins 01 April 2021.

Please provide the records described in the GHG Plan pertaining to “Forest management plans and historical records provided for verification demonstrate no deviation from management plans or from historical trends.

Or provide an updated American Tree Farm Certificate and update the language in the GHG Plan to reflect the documentation provided.

Project Personnel Response: See renewed certification here:

<https://www.grossmanforestry.com/jerry/Tree%20Farm%20Group/Certificate.pdf>

Auditor Response: Confirmed, thank you.

Bearing on Material Misstatement or Conformance (M/C/NA): C**NIR 2 Dated 29 Nov 2022**

Standard Reference: ACR Standard v7.0 5.A,
ACR IFM Methodology v1.3 Section B5

Document Reference: ACR562 Monitoring Report_wAttachment A.pdf

Finding: Section 5.A of the Standard states “AFOLU Project Proponents shall conduct their risk assessment using the ACR Tool for Risk Analysis and Buffer Determination” and Section B5 of the Methodology states “Project Proponents must conduct their risk assessment using the ACR Tool for Risk Analysis and Buffer Determination.” The ACR Tool for Risk Analysis and Buffer Determination states, “Projects that experience an epidemic disease or pest outbreak on the project area must increase the risk value for this category at the next verification event” and identifies that a value of “8% if epidemic disease or infestation is present within project area, or within 30-mile radius of project area” or a default value 4% is used otherwise.

A search of online spatial databases and Michigan forest health resources suggest that there is moderate to heavy Jack Pine Budworm defoliation and widespread instances of Beech Bark Disease in Michigan’s Upper Peninsula and specifically on the Hiawatha National Forest, within a 30-mile radius of the project area.

Section VI-4 and Attachment A of “ACR562 Monitoring Report_wAttachment A.pdf” indicate that the default value of 4% for pest and disease risk is used. Please explain why the default 4% value is used when there are seemingly significant levels of Jack Pine Budworm and Beech Bark Disease in the immediate vicinity of the project area, suggesting that an 8% value is justified.

Project Personnel Response: From the ACR Standard: “If no reversals occur, the project’s risk category and Minimum Buffer Percentage may remain unchanged for 5 years. The risk analysis must be re-evaluated at least every 5 years, or coincident with site visit verification. An exception is in the event of a reversal, in which case the project baseline, risk category, and Minimum Buffer Contribution shall be immediately re-assessed and re-verified.”

Auditor Response: Accepted.

Bearing on Material Misstatement or Conformance (M/C/NA): C

NIR 3 Dated 2 Dec 2022**Standard Reference:** ACR Standard v7.0 Section 6.E**Document Reference:** ACR562 Monitoring Report_wAttachA_112922.pdf

ACR562 GHGPP Calculations Draft_RP2_112922.xlsx

Finding: The ACR Standard v7.0 Section 6.E states “The report shall describe the current status of project operation, and include the data monitored and monitoring plan, and the calculated emission reductions for the reporting period.”

Section III.1 in ACR562 Monitoring Report_wAttachA_112922.pdf states “Total GHG reductions/removals during reporting period: 363,291.59 mt CO₂e”, however the totals reported in Section VI.4 and VI.5, and in the “ERT_UNC” tab in ACR562 GHGPP Calculations Draft_RP2_112922.xlsx, equal 203,175 mt CO₂e. Please provide additional information on this discrepancy.

Project Personnel Response: Discrepancy corrected in Monitoring Report, value of 203,175 mt CO₂e confirmed as the correct GHG reduction/removal total.

Auditor Response: Received, thank you.

Bearing on Material Misstatement or Conformance (M/C/NA): C

NIR 4 Dated 2 Dec 2022**Standard Reference:** ACR Standard v7.0 Section 6.E

ACR IFM Methodology v1.3 Section 3.2

Document Reference: ACR562 Monitoring Report_wAttachA_112922.pdf

ACR562 GHGPP Calculations Draft_RP2_112922.xlsx

Finding: The ACR Standard v7.0 Section 6.E states “The report shall describe the current status of project operation, and include the data monitored and monitoring plan, and the calculated emission reductions for the reporting period.”

Section 3.2 in the ACR IFM Methodology v1.3 describes the process for calculating Harvested Wood Products as:

1. Determining the amount of carbon in trees harvested that is delivered to mills (bole without bark).
2. Accounting for mill efficiencies.
3. Estimating the carbon remaining in in-use wood products 100 years after harvest.
4. Estimating the carbon remaining in landfills 100 years after harvest.
5. Summing the carbon remaining in wood products 100 years after harvest.

Section IV.3 of ACR562 Monitoring Report_wAttachA_112922.pdf reports Harvested Wood Products at the end of RP2 as 24,665.18 tCO₂e. The “ERTs_UNC” tab in ACR562 GHGPP Calculations Draft_RP2_112922.xlsx reports the Harvested Wood Products at the end of RP2 as 4,379 tCO₂e. The “Carbon_Pools” tab in ACR562 GHGPP Calculations Draft_RP2_112922.xlsx reports the total live tree harvest as 24,665.18 tCO₂e. Please provide clarification on why total live tree harvest appears to be reported in place of harvested wood products in the Monitoring Report.

Project Personnel Response: Discrepancy corrected in Monitoring Report, value of 4,379 mt CO₂e confirmed as the correct Harvested Wood Product value.**Auditor Response:** Received, thank you.**Bearing on Material Misstatement or Conformance (M/C/NA):** C

NIR 5 Dated 2 Dec 2022**Standard Reference:** ACR Standard v7.0 Section 2.A**Document Reference:** ACR562_RP2.gdb

ACR562 GHGPP Calculations Draft_RP2_112922.xlsx

Finding: Plots #112 and #124 both fall within harvest boundaries reported in ACR562_RP2.gdb. No reference is found as to whether these plots were checked for harvested trees and if that information is utilized. It appears that the EORP2 carbon stocks reported in ACR562 GHGPP Calculations Draft_RP2_112922.xlsx are based on growth and yield outputs from the validated model and reported RP2 harvest volumes, independent of the plot-level treelist. Please describe how the approach used is either more accurate or more conservative than utilizing plot-level harvest information where available.

Project Personnel Response: Project stocks were depleted using a registry-approved method for quantification of total carbon in trees harvested for wood products based on scaled harvest volumes. Updated plot-level data was not available for comparative analysis. That said, FC recognizes the potential applicability of this alternative method and will consider it for future Reporting Periods.

Auditor Response: Accepted.

Bearing on Material Misstatement or Conformance (M/C/NA): M/C