# **VERIFICATION REPORT**

Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation



Document prepared by AENOR INTERNACIONAL S.A.U.

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ER Program Name	Emission Reduction Report for the Indonesia-Norway Partnership					
Baseline Reference Period Covered in this Report	1 <sup>st</sup> July 2006 to 30 <sup>th</sup> June 2016 (2006/2007 to 2015/2016)					
Reporting Period Covered in this Report	2 <sup>nd</sup> Monitoring Period: 1 <sup>st</sup> July 2017 to 30 <sup>th</sup> June 2018 (2017/2018 period) 3 <sup>rd</sup> Monitoring Period: 1 <sup>st</sup> July 2018 to 30 <sup>th</sup> June 2019 (2018/2019 period)					
Number of ERs	<ul> <li>(1) 286,406,892 tCO<sub>2</sub>e before double claiming discounting <ul> <li>76,258,928 tCO<sub>2</sub>e for 2017/2018</li> <li>210,147,963 tCO<sub>2</sub>e for 2018/2019</li> </ul> </li> <li>(2) 285,378,419 tCO<sub>2</sub>e after double claiming discounting <ul> <li>75,522,287 tCO<sub>2</sub>e for 2017/2018</li> <li>209,856,132 tCO<sub>2</sub>e for 2018/2019</li> </ul> </li> <li>(3) 185,495,972 tCO<sub>2</sub>e after 35% deduction due to uncertainty risk and Indonesia's ambition to reduce GHG emissions <ul> <li>49,089,487 tCO<sub>2</sub>e for 2017/2018</li> <li>136,406,486 tCO<sub>2</sub>e for 2018/2019</li> </ul> </li> </ul>					
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# 1. INTRODUCTION

### 1.1. Objective

In verifying the results available, the process of verification has considered the content of Indonesia's results report based on all elements of MRV Protocol /2/ and its Annex /3/, referring to the MoU and Contribution Agreement. AENOR's audit team has ensured that the agreed use of methods, processes, and consistencies as established by the MRV Protocol /2/ are the guiding criteria for the verification. The verification ensures that the reported results are based on consistent use of appropriate methodologies in line with the MRV Protocol /2/.

As such, the objective of the verification is the independent evaluation of the results in reducing emissions from deforestation and forest degradation in Indonesia at national level, reported in the document "Emission Reduction Report for the Indonesia – Norway Partnership" or ERR /1/. The following two monitoring periods have been taken into account:

- 2<sup>nd</sup> Monitoring Period: 1st July 2017 to 30th June 2018 (2017/2018 period).
- 3<sup>rd</sup> Monitoring Period: 1st July 2018 to 30th June 2019 (2018/2019 period).

For clarifying purposes, in a previous assessment that happened between 2019 and 2020, AENOR assessed the following period:

• 1<sup>st</sup> Monitoring Period: 1<sup>st</sup> July 2016 to 30<sup>th</sup> June 2017 (2016/2017 period).

The three monitoring periods (for this verification process, only 2017/2018 and 2018/2019 periods have been considered) were assessed in comparison to the following results-based payment (RBP/C) baseline, as reported in the document *4th\_Revised ERR Indonesia-Norway\_as per 23 Nov* 23\_19\_24\_Clean/1/ (from now on, "ERR"):

• 1<sup>st</sup> July 2006 to 30<sup>th</sup> June 2016 (2006/2007 to 2015/2016).

This RBP/C baseline is valid up to 2019/2020, in accordance with the MRV Protocol /2/ most updated version, Section 2.2.

Moreover, as per required by the Framework Contract between the Royal Norwegian Ministry of Climate and Environment and AENOR INTERNACIONAL S.A.U, there are some general verification objectives:

- Ensure an independent, credible, and high-quality verification, aligned with UNFCCC decisions and considering international standards and practice for results-based payments.
- Validate the consistency of the methodology used to estimate emissions reductions in relation to the methodology established by the Forest Partner Country in the development of its Reference Level and in accordance with the relevant MRV protocol.
- Allow reconstruction of reported emission reductions.
- Verify the results on estimated emission reductions in order to avoid errors, omissions or misrepresentations that could influence the overall results, and thereby decisions related to results-based payments.
- Analysis and propose options for strengthening MRV systems, where applicable.



### 1.2. Scope

The scope of the verification was limited to the following indicators:

- Emissions from gross deforestation at the national level 2006/2007-2015/2016 used as RBP/C baseline for the 2017/2018 and 2018/2019 monitoring periods.
- Emissions from gross forest degradation at the national level 2006/2007-205/2016 used as RBP/C baseline for the 2017/2018 and 2018/2019 monitoring periods.
- Emission reductions measured as tonnes CO2e, including all sources of emissions included in the RBP/C.

The ERR for the Indonesia – Norway Partnership verification process has been carried out in accordance with the requirements established in the ISO 14065:2020 and ISO 14064-3:2019 "Greenhouse Gases. Part 3: Specification with guidance for validation and verification on greenhouse gases".

### 1.3. Criteria

The criteria for assessing the reported results were the correct application of the methodology used for the definition of the First Indonesia Forest Reference Emission Level (FREL), applied to the periods 2006/2007-2015/2016 for constructing the RBP/C baseline reference period and 2017/2018 and 2018/2019 monitoring periods to quantify the emission reductions against it, under the framework outlined by the bilateral agreements of the Indonesia-Norway partnership, the MRV Protocol.

These criteria are specified in the following documents:

- National Forest Reference Emission Level (FREL) for Deforestation and Forest Degradation: In the Context of Decision 1/CP.16 para 70 UNFCCC (Encourages developing country Parties to contribute to mitigation actions in the forest sector). (2016).
- MRV protocol for the Indonesia-Norway partnership on climate, forests and peat /2/.
- Annex: Detailed steps for calculating results-based payments under the Indonesia-Norway forest partnership /3/.

Moreover, other relevant documents can be found within Annex 5: Reference documentation, within this verification report. Some of them are quoted below as guidance:

- Report on the technical assessment of the proposed forest reference emission level of Indonesia submitted in 2016. (2016).
- Indonesia Second Biennial Update Report Under the United Nations Framework Convention on Climate Change. (2018).
- Technical report on the technical analysis of the technical annex to the second biennial update report of Indonesia submitted in accordance with decision 14/CP.19, paragraph 7, on 21 December 2018. (2018).
- Indonesia Third Biennial Update Report Under the United Nations Framework Convention on Climate Change.



- Technical report on the technical analysis of the technical annex to the third biennial update report of Indonesia submitted in accordance with decision 14/CP.19, paragraph 7, in December 2021.
- 2006 IPCC Guidelines for National Greenhouse Gas Inventories.
- 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands.
- 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories.
- Good Practice Guidance for Land Use Land-Use Change and Forestry. (2003).
- Good Practice Guidance and Uncertainty Management in National GHG Inventories. (2000).
- Global Observation of Forest and Land Cover Dynamics (GOFC-GOLD) REDD+ Source Book. (2015).
- GFOI Methods and Guidance Documents (2013&2016) and supplementary modules.
- ISO 14064-3:2019 Part 3: Specification with guidance for the verification and validation of greenhouse gas statements (2019).

### **1.4. Level of assurance and materiality**

The assessment was conducted to provide a reasonable level of assurance of conformance against the defined audit criteria and materiality thresholds within the audit scope. Based on the audit findings, a positive evaluation statement reasonably assures that the greenhouse gas (GHG) assertion is materially correct and credible.

The threshold for materiality with respect to the aggregate of errors, omissions and misrepresentations relative to the total reported GHG emission reductions was five percent (5%).



# 2. AUDIT PROCESS

### 2.1. Audit team

The audit team consisted of the following members:

Role	Name	Attending site visit	
Team Leader 1	Daniel Bermejo Vesga	Yes	
Team Leader 2	Javier Cócera Cañas	No	
Support Verifier 1	Adrián Vidal de Prados	No	
Support Verifier 2	Pablo Moreno	No	
Regional Expert	Waqar Ahmed	Yes	
Project Manager and Technical Reviewer	Jose Luis Fuentes	No	

Daniel Bermejo is a Forest Engineer with a MSc in Sustainable Finance. He began his career in private consulting, specializing in climate risk analysis and TCFD risks, forestry development, agriculture and forestry banking standards, environmental footprint projects and others. He has participated as an auditor in several AFOLU projects in different carbon schemes, such as VCS, CCB, GS, FCPF, Cercarbono and BCR. Daniel has a professional Certificate Program in Sustainable & Inclusive Landscapes from Wageningen University, understanding topics regarding Landscape Leadership, Governance, Finance and Climate Action. He has participated in several ISO lead auditor courses. He has worked in LATAM, North America, Africa, and Europe countries. He speaks Spanish, English and French fluently.

Javier Cócera is a Forest Engineer with a MSc in Forest Management. He has developed his career focused on forest management. Mainly he has been working through sustainability in two ways: the main one as forestry consultancy, developing forest management plans, working with GIS and LiDAR both in the field and the office and getting experience of the forest resources. The second one was developing environmental footprint projects and sustainability reports. Currently Javier is working in AENOR as auditor focused in AFOLU projects. Javier participated in courses about ISO lead auditing and have performed audits in projects in Europe, LATAM, Africa and Asia. He speaks Spanish and English fluently.

Adrián Vidal holds a master's degree in Forest Engineering from the Technical University on Madrid, and a Postgraduate Diploma in Climate Change from the National University of Quilmes and the National University of Jujuy, with the support of UNEP. Adrián works at the Climate Change Unit in AENOR and has more than 5 years of professional experience in forestry and sustainability. Prior to joining AENOR, he worked at the Basque Center for Climate Change (BC3) in carrying research in global governance, national policies, and modelling of Agriculture, Forestry and other Land Use (AFOLU) mitigation measures. He worked as an intern at the AFOLU Unit of the Transparency division of UNFCCC, providing support to the intergovernmental climate change process on issues related to land-use, land-use change and forestry (LULUCF), agriculture and REDD+. He also worked in urban



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forestry, landscape forest restoration and environmental consultancy, and collaborated in the Global Forest Survey project of FAO.

Pablo Moreno is a Forest Engineer with a Master's in Forest management. Pablo joined AENOR in 2023 and has more than four years of experience in forestry and sustainability. Since finishing his master's degree, Pablo has worked in forest management, operations management, technical analysis, working with GIS and fieldwork, as well as quality assessment and R&D development in forestry production-related topics in search of efficiency and process optimization. His other career path has focused on sustainability consultancy, research, and climate change. He has worked in different countries: Spain, U.S.A., and Australia. In AENOR works with international projects, mainly in Africa and South America. He is a native Spanish speaker proficient in English and holds a basic level of French.

Waqar Ahmed is serving in the University of Karachi as a full-time faculty since 2006. Currently serving as an Assistant Professor, his duties include teaching, research and community service. He has also got experience in teaching as a visiting faculty in other universities like, University of Warsaw, Poland and Hamdard University. He has gained experience in research publications, with particular reference to marine pollution. With a MSc in environmental science and a PhD on Ecology of Mangroves of Indus Delta Pakistan, he has good knowledge of ecology, mangroves and marine pollution. He has written 24 international research articles and is well versed with principles of ecology and biodiversity. He teaches the subjects of Wildlife Ecology and Wetland Management, Climate Change, Marine Pollution, and others. He is also a certified trainer of the Integrated Coastal Management by IUCN. He has worked as a freelancer in various carbon assessment projects in Pakistan and Indonesia. He also has experience of providing consultation for implementation of biodiversity standards in CDC funded projects (following the IFC Guidelines on PS6, Biodiversity Management) in wind power plants in Pakistan. He is also a member of IUCN Commission on Ecosystem Management. He is fluent in English language in both spoken and written.

José Luis Fuentes is the manager of the Climate Change Unit of AENOR. He is a Forestry Engineer with a master's in business administration and a Post-Graduate in Environmental Management. He is fluent in Spanish and English. He has over 20 years of experience in auditing, consulting and training activities related to environmental and carbon management projects. Jose Luis has actively participated in the audit of international sustainable development projects in several carbon schemes, such as the Clean Development Mechanisms (CDM), Verified Carbon Standard (VCS), Climate, Community and Biodiversity Standards (CCB), Gold Standard (GS) and carbon footprints (ISO 14067 and ISO 14064). Jose Luis has extensive technical knowledge about the regulatory framework, policies and technical provisions emanating from the Paris Agreement, the Kyoto Protocol and the Conferences of the Parties.



### 2.2. Method and considerations

The verification was performed through a combination of document review, interviews and communications with relevant personnel. The conformity of the determination of emission reductions was evaluated against the criteria set forth in Section 1.3 and Appendix 5. As described below, findings were issued to ensure that all requirements were met.

The audit team carried out a risk-based assessment for the assurance of gross deforestation, gross forest degradation and the estimated emissions reductions. In accordance with ISO 14064-3:2019, the risk assessment is based on:

- The inherent risks of discrepancies for each variable used to estimate emission source and the GHG reporting system.
- The risk that controls are insufficient to detect and prevent each inherent risk from causing a discrepancy in the GHG assertion.
- The potential magnitude of each inherent and control risk described above resulting from the contribution of the associated emission source.

This information was used to develop an appropriate verification procedure for each identified risk. Each procedure was designed to reduce the probability that the verification would not detect a discrepancy that has not been corrected by the technical team responsible for the control.

Although there may be a level of risk inherently related to remote estimation processes and the development of the deforestation and forest degradation emission factors used in the estimation, the audit team did not focus on this since this risk has already been defined with the use of the 1<sup>st</sup> FREL as a guide and main criterion for verification. For this reason, the following elements included in the ERR /1/ constitute a risk classified as low, where it is not expected to have further findings or discrepancies regarding the procedures followed since these simply must comply with the established in the 1<sup>st</sup> FREL:

- Area and geographical boundaries.
- Carbon pools and types of GHG included.
- Forest, deforestation and forest degradation definition.
- Emission factors.

The next aspects were considered of medium risk. Therefore, they were assessed more thoroughly:

- Land use and land use change maps elaboration.
- Gross deforestation calculation.
- Gross forest degradation calculation.
- Emissions from deforestation and forest degradation calculation.

In AENOR's opinion, the verification has turned out to be of low-medium risk taking into account that: 1) the Indonesia-Norway partnership on climate, forests and peat has standardized processes for cartographic management and calculation, under the responsibility of the National Forest Monitoring System (NFMS), 2) that the Ministry of Environment and Forestry (MoEF) technical team involved in the MRV and the elaboration of the report have the appropriate knowledge, and 3) that the elaboration of Indonesia's 1<sup>st</sup> FREL and 3<sup>rd</sup> BUR, prior to this process, have allowed the learning and improvement of the processes, protocols, etc. Therefore, the risk of errors, discrepancies or omissions is considered low-medium.



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The audit team focused its activity during the verification process on ensuring that the procedures carried out for the calculation of gross deforestation, gross forest degradation and the reduction of deforestation and forest degradation emissions have been carried out following the same methodology as the used in Indonesia's 1<sup>st</sup> FREL, as agreed by the parties of the Indonesia-Norway partnership in the MRV Protocol.

AENOR reproduced and verified 100% of the calculations in the calculation spreadsheet *Spreadsheet\_REDD Norway\_2006-2019\_Final\_Update Risk of Double Claim\_as per 23 Nov 23\_18\_37 /8/* (from now on, "REDD calculation spreadsheet") for the estimation of emissions from deforestation and forest degradation for the period 2006/2007-2015/2016 and emissions reductions from reduced deforestation and forest degradation for the monitoring periods 2017/2018 and 2018/2019. It was verified that the data necessary to calculate GHG reductions were adequately provided and reproducible.

The geographical boundaries and the deforested and degraded areas during the monitoring period were verified using the land cover maps from 2006/2007-2015/2016 and 2017/2018 and 2018/2019 monitoring periods by the NFMS through the analysis of the data obtained by remote sensing. The accuracy assessment of the land cover maps was reviewed to determine their level of accuracy.

Carbon pools and forest classes were 100% verified and checked against Indonesia's 1<sup>st</sup> FREL and the *Annex: Detailed steps for calculating results-based payments under the Indonesia-Norway forest partnership* /3/.

Some errors were identified and subsequently corrected. These findings are detailed in Annex 6. All clarifications have been successfully closed.

An in-country visit was conducted from October the 4<sup>th</sup> to 6<sup>th</sup>, 2023, in which members of the audit team interviewed relevant staff of the MoEF responsible for the monitoring and reporting of the reduced emissions from deforestation and forest degradation.

Based on the assessment carried out, AENOR confirms with a reasonable level of assurance that the claimed GHG emission for the period 2006/2007-2015/2016 and the claimed GHG emissions reductions for the monitoring periods 2017/2018 and 2018/2019 are free from material errors, omissions or misstatements.

In addition, AENOR confirms that sufficient evidence was presented and that there is a clear audit trail that contains the evidence and records that confirm the stated figures in this Verification Report since:

- The evidence available and presented to AENOR is sufficient. 100% of the data used in the calculations have been provided to achieve the final amount of GHG emissions and GHG emissions reduction reported.
- The nature of the evidence is adequate. The raw data were collected from reliable sources. They are detailed in the *ERR* /1/ and have been provided to the verification team. The most relevant are appropriately detailed in Annex 3.
- Evidence was cross-checked. AENOR verified the information provided and reproduced the calculations.

Hence, AENOR confirms that the stated figures in the *ERR* /1/ are correct and confirms that is able to verify the deforestation and forest degradation emissions reductions based on verifiable and reliable evidence.



### 2.3. Document review

AENOR carried out a thorough review of the documentation provided by the Directorate General of Climate Change of the MoEF to verify compliance with the verification criteria. The reviewed documentation includes, among others:

- Emission Reduction Report for the Indonesia-Norway Partnership /1/.
- National Forest Reference Emission Level for Deforestation and Forest Degradation: In the Context of Decision 1/CP.16 para 70 UNFCCC (Encourages developing country Parties to contribute to mitigation actions in the forest sector).
- Report on the technical assessment of the proposed forest reference emission level of Indonesia submitted in 2016.
- Indonesia Second Biennial Update Report Under the United Nations Framework Convention on Climate Change.
- Technical report on the technical analysis of the technical annex to the second biennial update report of Indonesia submitted in accordance with decision 14/CP.19, paragraph 7, on 21 December 2018.
- Indonesia Third Biennial Update Report Under the United Nations Framework Convention on Climate Change.
- Technical report on the technical analysis of the technical annex to the third biennial update report of Indonesia submitted in accordance with decision 14/CP.19, paragraph 7, in December 2021.
- Land cover maps: 1990, 1996, 2000, 2003, 2006, 2009, 2011, 2012, 2013, 2015, 2016, 2017, 2018 and 2019.
- Land cover changes database PIVOTDB.
- Emissions calculation spreadsheet Spreadsheet\_REDD Norway\_2006-2019\_Final\_Update Risk of Double Claim\_as per 23 Nov 23\_18\_37 /8/.
- Indonesia Report on REDD+ Performance.

Annex 3 contains the complete list of the documentation reviewed during the verification process.

### 2.4. In-country visit

An in-country visit was conducted from October the  $4^{th}$  to  $6^{th}$ , 2023. The main objectives of the site visit were to:

- Understand in practice the estimation of gross deforestation and gross forest degradation at the national level: choice satellite images and pre-processing, image processing, accuracy assessments and activity data reporting.
- Understand the methodological steps for the determination of emissions from deforestation and forest degradation, the emissions reductions and the results reported under the RBP/C system.



- Understand the uncertainty estimation methods and the QA/QC procedures used.
- Understand the institutional arrangements put in place for the monitoring and reporting of the reduced emissions from deforestation and forest degradation.
- Understand how MoEF has considered the risk of double claiming in the conservativeness of the emission reductions calculations due to deforestation and forest degradation.

During the visit, the audit team had the opportunity to listen and raise their questions to the technical team responsible for processing and preparing the land cover maps and for the calculation of emission and emissions reductions.

Annex 5 contains the lists of the attendants to the meetings held during the in-country visit.

### 2.5. Resolution of clarifications

As a result of the verification process, the audit team identified several findings, raised as clarifications (CLs). A Clarification Request (CL) shall be raised if the information is insufficient or not clear enough to determine whether the applicable finding-specific requirements have been met.

The findings raised during the verification process, and the responses for their closure, are described in Annex 6.

All findings issued by the AENOR audit team during the verification process have been closed.

### 2.6. Internal quality control

The Verification Report has undergone an internal quality control process through a technical review, once the assigned verification team issued its final opinion. The technical reviewer is a qualified member of AENOR, independent of the team that carried out the verification. The technical reviewer or the team assigned for such review are qualified in the relevant technical areas.



## 3. VERIFICATION FINDINGS

### 3.1. Area and geographical boundaries

The geographical boundary and area covered by RBP/C under the Indonesia-Norway partnership on climate, forests and peat is clearly defined in the *Emission Reduction Report* as the whole natural forest (primary and secondary) in the territory of the Republic of Indonesia, including dryland, mangrove and swamp forest. Only areas with forest classes existing in the year 1990 that were not deforest up to 2006 were considered.

The audit team verified that the definition of boundaries is consistent with the *MRV protocol* /2/ and its *Annex: Detailed steps for calculating results-based payments under the Indonesia-Norway forest partnership* /3/.

Moreover, the area of all-natural forest in 2006 (start RBP/C period) is 96,454,143 ha.

AENOR's audit team verified, through the land cover maps, that boundaries and areas considered for the determination of the RBP/C baseline, and the emissions reductions are correct.

### 3.2. Activities covered, carbon pools and GHG

The REDD+ activities considered for the RBP/C were those related to deforestation and forest degradation, as stated within Section 2.2.2 of the ERR /1/, in accordance with the MRV Protocol /2/ and the agreed ToRs. Other REDD+ activities found in the  $2^{nd}$  Indonesian FREL have been excluded.

The only carbon pool included as part of the RBP/C baseline and reductions is aboveground biomass (AGB) and the only considers changes in carbon stocks, reported as CO<sub>2</sub>e.

AENOR verified that the activities, carbon pools and GHGs considered are in accordance with the *Annex: Detailed steps for calculating results-based payments under the Indonesia-Norway forest partnership* /3/.

Emissions from peat decomposition and peat fires are included in the *ERR* /1/ as an annex and, for the two applicable monitoring periods, excluded from the RBP/C, in conformity with the *Annex: Detailed steps for calculating results-based payments under the Indonesia-Norway forest partnership* /3/.

### 3.3. Forest, deforestation and forest degradation definitions

The AENOR team verified that the definitions used for forest, deforestation and forest degradation are consistent with those used in Indonesia's 1<sup>st</sup> FREL.

### <u>Forest</u>

Land area of more than 6.25 hectares with trees higher than 5 meters at maturity and a canopy cover of more than 30 percent. Six classes of natural forest are considered in the RBP/C, in line with Indonesia's 1st FREL:

- Primary dryland forest
- Secondary dryland forest
- Primary mangrove forest
- Secondary mangrove forest



- Primary swamp forest
- Secondary swamp forest

Only the existing natural forest in 1990 are considered. Plantation forests are excluded.

#### **Deforestation**

One-time conversion of natural forest cover to other land-cover categories that occurred in the same area. Deforestation occurred in regenerated forest, that previously deforested, is not considered.

#### Forest degradation

Forest degradation refers to the process of transforming from primary to secondary forest classes. This transition leads to a reduction in the amount of carbon stocks within the forest due to human activities. The secondary forests that result from these transitions have undergone selective logging or experienced other disturbance events, such as fires and encroachment.

### 3.4. Baseline for RBP/C definition

AENOR's audit team verified that the definition used for Results-Based Payment/Contribution (RBP/C) is consistent with the requirements of the MRV Protocol. Specifically, it refers to the projection of CO2 gross emissions that is used as a reference to compare against actual emissions at a given point in time in the future.

### 3.5. Data (Activity Data and Emission Factors)

### 3.5.1. Activity Data

According to the information crosschecked from the ERR Section 2.3.1, the activity data used comes from land cover maps created by the MoEF as part of the National Forest Monitoring System (NFMS). The maps from 2006, 2009, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, and 2019 were analyzed for historical land cover changes and emissions estimates. Additional datasets from 1990, 1996, 2000, and 2003 were also included to ensure consistency.

AENOR's audit team reviewed the NFMS and the online map services and compared it with the information disclosed within the REDD+ Spreadsheet calculations /8/. The audit team has made sure that the reporting included accurate activity data and the description of data sources and coverage.

#### 3.5.2. Emission Factors

According to the information crosschecked from the ERR Section 2.3.2, the RBP/C baseline calculation for Indonesian forest degradation (FREL) uses emission factors (EFs) derived from data from the National Forest Inventory (NFI), a national program initiated by the Ministry of Forestry in 1989.

The analysis uses Tier-2 EFs for deforestation and forest degradation (local activity data, with conversion factors sourced from relevant sources of information of Indonesia), with over 3,900 clusters of sample plots developed from 1989 to 2013.



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The AGB of individual trees in the plots is estimated using an allometric model developed for tropical forests, but the generalized allometric model of Chave et al. (2005) was selected due to its performance in Indonesian tropical forests.

The emission factors for deforestation and forest degradation are calculated using the losses of carbon stock from the deforested forest and the difference in carbon stock between primary and secondary forests. The conversion factor from C to CO2 is calculated using the 44/12 conversion factor, as recommended by the IPCC. More information on forest carbon stock can be found within Annex 3 of Indonesia's FREL, as has been assessed by AENOR's audit team.

Moreover, within this same Section, Tables 2 and 3 refer to the deforestation and forest degradation emission factors by forest classes and regions, respectively. As such, Table 2 reports information about the different six forest classes, in accordance with the FREL, for seven (7) different regions: Jawa, Kalimantan, Maluku, Bali-Nusa Tenggara, Papua, Sulawesi and Sumatera.

The same principle applies for Table 3, but only for the three primary forest classes: Primary Dryland Forest, Mangrove Forest and Swamp Forest, as there is no forest degradation identified in Secondary Dryland Forest, Mangrove Forest and Secondary Swamp Forest.

The audit team verified that the emission factors for deforestation and forest degradation used were the same of Indonesia's 1st FREL, which were derived from the NFI, and consider only AGB.

Forest Classes	Emission factors of deforestation (tCO₂e/ha)							
Forest Classes	JAWA	KALIMANTAN	MALUKU	NUSA BALI	PAPUA	SULAWESI	SUMATERA	
Primary Dryland Forest	458.8	464.7	519.9	473.3	412.4	474.7	463.3	
Secondary Dryland Forest	294.1	350.7	383.1	280.6	311.2	356.2	314.3	
Primary Mangrove Forest	455.2	455.2	455.2	455.2	455.2	455.2	455.2	
Secondary Mangrove Forest	347.9	347.9	347.9	347.9	347.9	347.9	347.9	
Primary Swamp Forest	332.4	474.0	332.4	332.4	308.4	369.8	380.9	
Secondary Swamp Forest	274.8	294.1	274.8	274.8	251.3	221.3	261.1	

Forest Classes	Emission factors of forest degradation (tCO <sub>2</sub> e/ha)							
Forest Classes	JAWA	KALIMANTAN	MALUKU	NUSA BALI	PAPUA	SULAWESI	SUMATERA	
Primary Dryland Forest	164.7	114.0	136.8	192.7	101.3	118.5	149.0	
Primary Mangrove Forest	107.3	107.3	107.3	107.3	107.3	107.3	107.3	
Primary Swamp Forest	57.6	179.9	57.6	57.6	57.1	148.5	119.7	

Finally, the audit team has assessed that emission factors were updated for constructing calculation in the second FREL, but to maintain consistency with the RBP/C/RBC Baseline, and complying with the MRV Protocol, the same EFs used in the 3<sup>rd</sup> BUR and Technical Annex of the 1<sup>st</sup> FREL have been considered for the ERR /1/.

AENOR's audit team has made sure that reporting has covered all the emission factors, rationale and data sources for estimating them. Proper description of methodological details has been disclosed for allowing the audit team reviewing and assessing that data is built on transparency, accuracy, completeness and consistency. Accessibility and proper identification of types of evidence has allowed the audit team to reconstruct the reported emission reductions.



The audit team has accessed the National Forest Inventory and crosschecked the information with reported data from the first Indonesian FREL. The information has been consistent with the reported data from the third BUR. The audit team has assessed the rational on the use of Chave et al, 2005 for quantifying aboveground biomass (AGB).

### 3.6. Methodology and Procedures

### 3.6.1. Forest Cover Change Analysis

In accordance with Section 2.4.1 of the ERR /1/, the annual forest cover change analysis from 1990 to 2019 identified deforestation as the transformation of natural forests into other land cover classes, occurring once at any location. Forest degradation refers to the transformation of primary forests into secondary forests in the subsequent year. Degraded forests were identified by comparing the Land Cover (LC) dataset of Tn (primary forests in the first period) to Tn+1 (secondary forests in the consecutive period).

More information about the calculation process has been disclosed within Annex 1 of the ERR.

### 3.6.2. Reference Period

AENOR verified that the reference period considered for the elaboration of the RBP/C baseline was 1<sup>st</sup> July 2006 to 30<sup>th</sup> June 2016 (2006/2007 to 2015/2016) as agreed in the Annex: Detailed steps for calculating results-based payments under the Indonesia-Norway forest partnership /3/.

Moreover, the selection of the RBP/C baseline interval period in Indonesia was based on transparent, accurate, and consistent land-cover data, a reflection of the forest transition, and the length of time that could account for national circumstances, policy dynamics, and carbon emissions under the Indonesia-Norway forest partnership.

### 3.7. Baseline Construction Results

### 3.7.1. Emission estimates from Deforestation

Section 2.5.1 of the ERR /1/ provides the average annual historical emissions from deforestation in MtCO2e, from 2006/2007 to 2015/2016, in accordance with the reference period. Conclusions reported refer to an average annual emission from deforestation of 236.9 MtCO2e, providing the baseline definitive value for deforestation.

### 3.7.2. Emission estimates from Forest Degradation

Section 2.5.2 of the ERR /1/ provides the average annual historical emissions from forest degradation in MtCO2e, from 2006/2007 to 2015/2016, in accordance with the reference period. Conclusions reported refer to an average annual emission from forest degradation of 41 MtCO2e, providing the baseline definitive value for forest degradation.

### 3.8. Constructed and Projected RBP/C Baseline and results

Thus, the total annual emissions from deforestation and forest degradation amounted 277.9 MtCO2e for the 2006/2007 to 2015/2016 baseline period, as highlighted within Section 2.6 of the ERR /1/.

Below can be found the calculation of the historical and projected annual emissions from deforestation and forest degradation, using historical data of 2006/2007 to 2015/2016. The same information has been reported within the REDD spreadsheet calculations /8/ and has been properly calculated.

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Year	Deforestation	Forest Degradation	Total annual emission	
2006-2007	286,399,781	59,051,617	286,399,781	
2007-2008	286,399,781	59,051,617	286,399,781	-
2008-2009	286,399,781	59,051,617	286,399,781	-
2009-2010	173,890,857	18,510,520	173,890,857	
2010-2011	173,890,857	18,510,520	173,890,857	rical
2011-2012	248,936,401	5,805,289	248,936,401	Historical
2012-2013	285,586,539	19,833,885	285,586,539	- I
2013-2014	116,066,230	9,515,931	116,066,230	
2014-2015	232,677,053	85,190,736	232,677,053	-
2015-2016	279,220,589	75,225,065	279,220,589	
2016-2017	236,946,787	40,974,680	277,921,466	
2017-2018	236,946,787	40,974,680	277,921,466	line
2018-2019	236,946,787	40,974,680	277,921,466	Baseline
2019-2020	236,946,787	40,974,680	277,921,466	ш

After deducting baseline emissions from actual annual emissions, emissions reductions from deforestation and forest degradation for periods of 2017/2018 and 2018/2019 are obtained, as reported in table 5 of Section 3 of the ERR /1/. See results below.

RBP/C baseline (tCO₂e/year)					
Deforestation	236,946,787				
Forest degradation	40,974,680				
Total RBP/C baseline	277,921,466				

Result Period	RBP/C Baseline (Million tCO2)		Actual Emissions (Million tCO2)		Result (Million tCO2)		Total (million
Result Fellou	Deforestation	Degradation	Deforestation	Degradation	Deforestation	Degradation	tCO2e)
2017/2018	236.95	40.97	140.86	60.80	96.09	-19.83	76.26
2018/2019	236.95	40.97	60.45	7.32	176.49	33.65	210.15
Total	473.89	81.95	201.31	68.12	272.58	13.83	286.41

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AENOR verified that the methodology used for the quantification of the gross deforestation and gross forest degradation for the periods 2006/2007-2015/2016 and 2017/2018 and 2018/2019 monitoring periods has been consistent with the methodology used for in Indonesia's 1<sup>st</sup> FREL. This was based in annual cover change analysis, overlaying land cover maps developed by the NFMS, for the period 1990-2019. As mentioned above, only forest areas existing in 1990 and not altered until 2006 were considered.

During the in-country visit, the audit team was able to follow in an exhaustive manner, together with the responsible technicians, the process of preparing the land cover maps. Detailed explanations of each of the steps were made and examples of the process were shown.

Deforestation and forest degradation emissions were calculated using the same methodology used in for Indonesia's 1<sup>st</sup> FREL, as explained in Annex 1 of the ERR /1/. The deforested or degraded areas (Activity Data or AD) are multiplied by the relevant deforestation or degradation emission factor (EFs) per forest class. In accordance with IPCC literature, the simplest and most conservative method was used to calculate the emissions, which involves the oxidation of 100% of the carbon stock immediately after deforestation/degradation.

The equations used were:

$$GE_{ij} = A_{ij} x EF_i$$

Where:

- *GE<sub>ii</sub>* emissions from deforested or forest degraded area-i at forest change class-j; tCO<sub>2</sub>e.
- *A<sub>ij</sub>* deforested or forest degradation area-i in forest change class j; ha.
- *EF*<sup>*i*</sup> emission factor from the loss of carbon stock due to change of forest class-j, owing to deforestation or forest degradation; tCO<sub>2</sub>e/ha.

$$GE_t = \sum_{i=1}^{N} \sum_{j=1}^{P} GE_{ij}$$

Where:

- $GE_t$  emission from deforestation and forest degradation at period t; tCO<sub>2</sub>e.
- *GE<sub>ij</sub>* emissions from deforested or forest degraded area-i at forest change class-j; tCO<sub>2</sub>e.
- *N* number of deforested or degraded forest area unit at period t (from t<sub>0</sub> to t<sub>1</sub>)
- *P* number of forest classes, which meet natural forest criterion.

AENOR reviewed the methodology for the quantification of the emissions from deforestation and forest degradation for the period 2006/2009-2015/2016 and 2017/2018 and 2018/2019 monitoring periods and found that it is used is in compliance with the criteria set in Section 1.3. AENOR reproduced all the calculations and obtained the same results, so it is considered that they are clearly and correctly represented in the spreadsheet and in the results report provided.



### 3.9. National Forest Monitoring System (NFMS)

The National Land Cover Map (NFMS) was established in 1989 by the MoEF in collaboration with the Government of Indonesia (GOI) and FAO. Its primary purpose is forest resources monitoring, using satellite imagery, mainly from Landsat data, to create land cover maps. The NFMS generates land cover maps of Indonesia regularly, covering 23 land cover classes, including cloud cover and no-data. The main data sources for the NFMS in Indonesia are the Landsat 5 Thematic Mapper (TM) and Landsat 7 Enhanced Thematic Mapper Plus (ETM+).

In 2008, the USGS changed its Landsat data policy, making it freely available over the internet. This has increased the availability of data for the NFMS, with approximately 218 scenes of Landsat data used to cover Indonesia within selected year intervals. In 2014, the NFMS established an MoU with the Indonesian National Space Agency (LAPAN) to ensure data sustainability.

The 23 land cover classes in the NFMS are generated based on the physiognomy or appearance of bio-physical covers, which can be visually distinguished using Landsat remote sensing data at a 30-meter spatial resolution. The classification process focuses on the visual appearance of the land cover, rather than probable land uses or covers. The minimum polygon unit size is 6.25 hectares, equivalent to 2.5 cm x 2.5 cm at a zoom screen of 1:50,000.

Figure 5 of the Section 4 of the ERR /1/ represents the general Indonesian Land Cover map workflow.

The National Forest Management System (NFMS) in Indonesia uses ground-truth points and reference data from Landsat satellite image pixels from 1990 to 2019. Quality control and quality assurance (QC/QA) processes are implemented for land-cover data, carbon stock data, and GHG emission calculation processes. QC is carried out at the regional office level at BPKH and the Forest Resources Inventory and Monitoring Directorate of MoEF.

QA is carried out at the plot level (PSP) by the regional office, involving forest biometric experts from the University and the National Research and Innovation Agency Indonesia. For GHG emission calculation, QC is carried out by the GHG Inventory & MRV Directorate and the Forest Resources Inventory and Monitoring Directorate, with at least three people or personnel independently involved.

External experts from MRV specialist practitioners, academics, and the National Research and Innovation Agency Indonesia are involved in QA. Reference points are selected using random sampling techniques and correlated with other data sources, such as SPOT 6 and 7 satellite imagery from 2013 to 2016.

The NFMS portal integrates internet and forest resource information systems to promote good forest governance through transparency. It maintains up-to-date, complete information and encourages public participation by providing a platform for access and benefit from shared information. The system assesses error matrix and user and producer accuracy.

AENOR verified that the personnel responsible for deforestation and forest degradation monitoring activities are fully trained and that the quality control and quality assurance (QA/QC) procedures to identify, review and manage the inconsistencies found are comprehensive and properly implemented.

The audit team cross-checked the land cover data contained in the spreadsheet *Pivot DB GIS\_DD\_Norway 2006-2019\_20230723\_final /9/* (data retrieved from the land cover maps for the years 1990, 1996, 2000, 2003, 2006, 2009, 2011-2019) with the activity data (deforested and degraded area) reported in the *ERR /1/* and used in the REDD+ Spreadsheet Calculation /8/. No discrepancy was found.

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AENOR's audit team confirms that the report considers guidance from UNFCCC Decisions on REDD+ and MRV decisions, on National Forest Monitoring Systems and includes a clear description of the NFMS, how it builds on existing systems and a description of the respective roles and responsibilities of institutions included in the national forest monitoring system. Moreover, AENOR's audit team has reviewed that there is a broad QA/QC activities description.

The audit team, during the site visit, requested relevant sources of evidence that demonstrate the applicability of QA/QC activities. As such, several documents were shown and discussed. As soon as the site visit finished, those SOPs were shared with the audit team. A sample of them are shown below:

- 1. akurasi-data-penutupan-lahan-nasional-tahun-1990-2016.pdf /18/
- 2. Definition\_Method\_Landcover.pdf /18/
- 3. Juknis Penafsiran Update Data PL 2020 Final.pdf /19/
- 4. Land Cover Process.pdf /20/
- 5. petunjuk-teknis-penafsiran-citra-satelit-resolusi-sedang.pdf /21/
- 6. petunjuk-teknis-pengecekan-lapangan-hasil-penafsiran-csrs.pdf /22/
- 7. potensi-sdh-indonesia-dari-plot-ihn.pdf /23/

These same documents referred to the (1) Accuracy National Land Cover Data, (2) the Definition and Method of Land Cover, (3) and (5) Technical Instructions, interpretation of medium resolution satellite images to update national land cover data, (4) Land Cover Data, (6) Technical Instructions, field check of interpretation results medium resolution satellite imagery to produce land cover data and (7) Potential of Indonesian Forest Resources from National Forest Inventory Plots.

### 3.10. Uncertainty

#### 3.10.1. Uncertainty analisis

Uncertainty (*U*) was determined in accordance with the IPCC 2006 Guidelines, specifically outlined in volume 1, Chapter 3. To calculate the combined uncertainty (Uj) for activity j, which takes into account the uncertainties from Activity Data (AD) and the emission factor (EF), Equation 1 is used:

$$Uij = \sqrt{EAj^2 + EEj^2}$$

#### Uncertainty related to Activity Data (AD)

Uncertainties related to deforestation and forest degradation activity data were obtained from the overall accuracy assessment of the land cover map.

The proportion of accuracy contribution ( $C_j$ ) for activity j was calculated using Equation 2, which involves the uncertainty (Uj) associated with activity j, the total emissions that occurred in the corresponding activities (Ej), and the total emissions from the corresponding year (E):

$$C_j = (E_j * U_j)^2 / E$$

The total uncertainty of each year (*TU*) was obtained by taking the square root of the sum of the proportion of accuracy contribution (Cj) for all activities using Equation 3:

$$TU = \sqrt{\sum C_j}$$



The uncertainty for the parameter "activity data" (land cover) was improved significantly 4.7% - 8.6% as compared to the previous calculation of 10%-12%. The accuracy assessment of land cover maps was performed based on randomly distributed reference points and the reference data for validating the land cover maps. The reference data sources used in this analysis were satellite images with a higher resolution than the satellite imagery used as a data source for land cover mapping, or better temporal resolution with multiple acquisitions. The total number of reference points used in the analysis for the period 1990-2016 were 10,000 sample points, randomly and proportionally distributed to all islands in Indonesia. Afterward, an accuracy assessment conduct yearly and reported in the recalculation of Indonesia's Land Cover Data Report /4/, as assessed by AENOR's audit team.

#### Uncertainty related to Emission Factors (EF)

The uncertainties of emission factor used in estimating carbon emissions were generated based on the standard error of carbon stock values from different forest types or classes in each major island or group of islands in Indonesia.

The carbon stock values were estimated from NFI plots that have been established in seven major islands/groups of islands in the country.

The uncertainty for the parameter "emission factor" varies between 17.6% to 24.9% depending on the specific island/group of islands and land cover classes considered. The uncertainty of emission factors related to deforestation and forest degradation is determined from the sampling errors of the NFI from each forest cover class within each island/group of islands.

Over the period from 2006 to 2017, the uncertainties in the emissions estimation showed improvement, declining from 18.5% in 2006 to 16.5% in 2017-2018. This improvement can be attributed to enhancements in the accuracy of activity data used in the estimation process. The uncertainties stemming from the activity data are often a result of potential misinterpretation of satellite imageries by the operators responsible for delineating the forest and land cover maps. However, efforts have been made to minimize these errors through various measures, including regular training and coordination, as well as the implementation of a robust QA/QC process encompassing specific SOPs for data collection, processing, and mapping standardization.

The uncertainties from the emission factors remained constant over time because all available NFI plot data from 1990 to 2014 were used for estimating carbon stocks for all periods. The uncertainty from emission factors was generated from the sampling errors of the NFI data. It's important to note that the uncertainty analysis for the emission factors did not incorporate the errors associated with the allometric equation used for converting NFI measurement data into carbon stock values.

AENOR reviewed the evaluation of the accuracy assessment of the land cover maps for the years 1990, 1996, 2000, 2003, 2006, 2009, 2011-2019

AENOR's audit team has reviewed relevant evidence regarding the QA/QC procedures applied by Indonesia, as can be seen within Section 3.9 of this verification report.

Thus, AENOR's confirms that the ERR includes a description of methodologies and data references used to analyse the uncertainty of the estimates. The audit team confirms the efforts made by Indonesia to comply with IPCC good practice requirements, regarding applying conservative approaches.

Moreover, AENOR confirms that the ERR provides accurate, precise and confidence levels for activity data and emission factors that are reasonable, and discuss key uncertainties, their sources and impacts.



### 3.11. Emissions from peat decomposition and peat fires

Annex 2 and Annex 3 of the ERR /1/ includes estimation of calculation of emissions from peat decomposition and peat fires, as the first one was reported and explained in the technical annex of the Biennial Update Report (BUR) until 2020, and the second one was not included in Indonesia's first FREL calculation. However, it is relevant to highlight that, in accordance with the Annex of the MRV Protocol /3/:

"Emissions from decomposition of deforested peatlands, and emissions from peat fires, will be **measured and reported** on using the best available methods and data, and the goal is to **phase also these performance indicators into the bilateral RBP/C** model over time.

Improvements to data and methodology, as well as the inclusion of additional activities, pools and gases (e.g., emissions from peat decomposition of peatlands outside of forests), are encouraged over time provided that these improve completeness, comprehensiveness, and accuracy. Such **improvements should be specified in an MRV improvement plan** that prepares for RBP/C baseline updates in line with point 2.6 of the MRV protocol."

Moreover, the same Annex of the MRV Protocol /3/ states that: "Peat decomposition and emissions from peat fire shall be measured and reported, but **not included as a performance indicator in the first reporting period under the partnership**. Plans shall be made to include peat decomposition and peat fire emissions in the RBP/C model over time. Even though peat fire emissions are not part of the RBP/C model from the start, a proxy approach for measuring reduced emissions from peat fires will be piloted and reported on".

As such, as stated alongside this verification report, the only two performance indicators taking into account by the ERR /1/ are emissions from deforestation and forest degradation, but Indonesia, in compliance with the Annex of the MRV Protocol /3/, decided to estimate and disclose both emissions from peat decomposition and peat fires.

Following the reported information, within Annex 2 and Annex 3 emissions from decomposition of deforested peatlands have been measured, explained and reported, using the best available methods and data, as has been reviewed by AENOR's audit team in the Peat spreadsheet calculation /11/. During the on-site technical meetings, different topics were conversed, maps were shown, and statistical treatment was broadly discussed.

All the procedures have been reported and crosschecked by the audit team. Relevant information, such as Land Cover Transition Matrix of Peatlands in 2012-2013, Matrix of CO2 EFs from Peat Decomposition, estimates of burnt area from peat and mineral soils between 2006 and 2020, Procedures for estimating the burnt peat area have been included as an example, among other relevant items.

To compute historical emissions from peat decomposition, the ERR /1/ states that peat decomposition emissions are a result of inherited emissions from degraded peatlands, which will not decrease unless they are converted back into forests. The first FREL document used regression analysis to develop linear equations for annual peat emissions. However, multi-year land cover maps were not available in certain years, so annual emissions were generated from average values of mapping periods.

The reference emission level for 2017-2020 was constructed using linear projection, with a coefficient of determination ( $R^2$ ) of 0.97, indicating a strong correlation. The reference period for this analysis was from 2006/2007 to 2015/2016. The conversion of degraded peatlands back into forests is unlikely to occur during the assessment period. Conclusions of emissions from Peat Decomposition can be found below:

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Year	Peat Decomposition	Actual Emission	Result
2007	200,067,598		
2008	200,067,598		
2009	200,067,598		
2010	215,742,080		
2011	215,742,080		
2012	226,109,789		
2013	234,152,020		
2014	240,799,350		
2015	248,530,578		
2016	255,413,778		
2017	260,556,280	256,741,233	3,815,047
2018	267,263,024	270,321,401	-3,058,377
2019	273,969,768	280,910,820	-6,941,052
2020	280,676,512		

To conclude about peat decomposition estimates:

- In 2017/2018, actual peat decomposition emissions were measured at 270,321,401 tCO2e. Based on historical emissions in the reference emission level for the period 2006-2016, the 2017/2018 emissions were projected to be 267,263,024 tCO2e. As such, the emission reduction for this period amounted to -3,058,377 tCO2e.
- In 2018/2019, actual peat decomposition emissions were measured at 280,910,820 tCO2e. Based on historical emissions in the reference emission level for the period 2006-2016, the 2018/2019 emissions were projected to be 273,969,768 tCO2e. As such, the emission reduction for this period amounted to -6,941,052 tCO2e.

Regarding historical emissions from peat fires, they were calculated for the period 2006-2016. Significant variation was found in the annual estimated burnt peat areas from 2006 to 2016. The highest rate of burnt peatland occurred in 2006, amounting to 1,140,438 ha, while the lowest rate was in 2008, with only 71,321 ha of burnt peat areas. Using this historical data set, the average value of burnt peat areas used as activity data was determined to be 374,948 ha.

As such, the results of the calculation of emissions from burnt peat areas have been presented in Figure Annex 3.4 of the ERR /1/. The peat fire average emissions from extreme years from 2006 to 2016 were 711,277,540 tCO2e/y, whereas for normal years they were 137,424,802 tCO2e/y. Thus, in 2018, emissions from peat fires decreased significantly, primarily due to stringent and extensive law enforcement measures and the continued moratorium (termination) on granting new licenses on primary forest and peatland. Fire incidents in peat areas that year impacted an area of 132,051 ha. In 2019, the number of fire incidents increased substantially, driven by factors including the El Niño extreme weather phenomenon, impacting an area of 501,499 ha.

As such, the ER from peat fires in 2018 and 2019 amounted to 15,534,497 tCO2e and 248,364,564 tCO2e respectively.



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### 3.12. Double accounting

- 1. Section 2.8 of the MRV Protocol /2/ states that:
  - A national system of accounting will be in place, to provide transparency and certainty that no double counting to emission reductions delivered under other agreements or partnerships occurs.
  - Rewarded emissions reductions should be registered in the Lima Info Hub to ensure transparency and certainty that no double counting to emission reductions delivered under other agreements or partnerships occurs.
- 2. Moreover, Section 3.2 of the MRV Protocol /2/ states that:
  - To ensure consistent, complete, transparent and accurate reporting of emission reductions resulting from reduced deforestation and other performance indicators, as agreed, in Indonesia.
- 3. Regarding REDD+ decisions, double counting has been mentioned on several occasions during COP meetings, including Cancun COP16 and Durban COP17. Closer to this moment, Article 6.4 of the Paris Agreement (COP26) provides guidance on how to ensure environmental integrity, and avoidance of double counting, considering also corresponding adjustment.
- 4. Finally, it is relevant to consider the importance of using best practice available for proceeding with emission reduction claims. As such, double accounting is a very sensitive topic that has raised importance as one of the most important aspects that provides transparency and accuracy.

Thus, to ensure consistent, complete, transparent, and accurate reporting of emission reductions resulting from reduced deforestation, Indonesia takes into account emission reductions that have been claimed at the same time as this reporting period (2017/2018 and 2018/2019). Based on the search and analysis that has been carried out (see Annex 5 of the ERR for more information about jurisdictional and voluntary carbon projects with potential of double claim with ERR), there are some indications of overlapping calculation areas in the ERR with several project proponents who have claimed emission reductions in the voluntary scheme. Those potential double-claimed areas in the period 2017/2018 are 248,081 ha and 98,281 ha for the period 2018/2019.

The scope of those voluntary schemes varies among projects, in terms of carbon pools, gases, activity, and methodologies. Concerning those variations, the Emission Reductions on those voluntary schemes becomes high, particularly in the peat soil calculation. Activities in the voluntary schemes generally were created to avoid deforestation and forest degradation, not as in the ERR calculation. This ERR only measures deforestation and forest degradation activities with the carbon pool only from AGB.

Based on that situation, and considering the conservative principle, Indonesia has used the proportion of the wide area covered by the voluntary projects with the area measured for the ERR accounting. This wide proportional approach is conservative due to considering the biggest proportion of emission reduction that could be gained inside the project area with the same size as the ERR calculation. The proportion of potentially double-claimed area is obtained from the area that has made ER claims compared to the total area covered in the ER calculation, which is the national natural forest area in 2006 (the beginning of the reference period). Next, the wide proportion is calculated by multiplying the proportion of the area that has the potential to double claim with Total ER in ERR.

Based on the explanation above, double claim indications for the 2017/2018 period amounted to 736,641 tCO2-e and in the 2018/2019 period amounted to 291,831 tCO2-e. As for the jurisdictional REDD+ scheme, there were no overlapping claims. Considering the possibility of double claims, the total ER calculation results will be 75,522,287 tCO2e for the 2017/2018 period and 209,856,132

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tCO2e for the 2017/2018 period, total observation period (2017/2018 and 2018/2019) will be amount to 285,378,419 tCO2-e.

	2017/2018	248.081
Area Overlap (ha)	2018/2019	98.281
Area ERR (All-Natural Forest 200	06) (ha)	96.454.143
Emission Reduction (tCO20)	2017/2018	76.258.928
Emission Reduction (tCO2e)	2018/2019	210.147.963
Total ER (tCO2e)		286.406.892
Overlap by area (%)	2017/2018	0,26%
Overlap by area (%)	2018/2019	0,10%
Potential of Doble Claim (tCO2e)	2017/2018	736.641
	2018/2019	291.831
Total ER minus Double Claim (tCO2e)	2017/2018	75.522.287
Total ER minus Double Claim (ICO2e)	2018/2019	209.856.132
Total (tCO2e)		285.378.419

The emission reduction results later deducted 35% (more information in the following Section of this report, 3.13).

All these numbers have been assessed. Conservative procedures applied by Indonesia are accepted by the audit team, as per the complexities of separating voluntary ER claimed from peat and SOC with respect to only AGB, in the same applicable circumstances that the ones referred in the ERR /1/.

### 3.13. Results-Based Payment/Contribution

According to Section 8 of the ERR /1/, RBP/C baseline for this report was established using the annual historical average level of each of the two performance indicators: emissions from deforestation and forest degradation. The baseline was developed based on data from the reference period covering the years 2006/2007 to 2015/2016 and remains valid up to the year 2019/2020.

Based on the MRV Protocol of Norway and Indonesia Partnership /2/, as assessed by the audit team, both Parties have agreed terms to treat statistical uncertainty, reversal risk, and possibly other risk factors inclusion of Indonesia's ambition. This treatment term later simplifies called set-asides/deductions as has been stated in the Annex of MRV Protocol /3/ that was agreed by both parties Indonesia – Norway. From the REDD spreadsheet calculations /8/, the following set-asides/deductions are used to determine the maximum number of emission reductions Indonesia can be rewarded for by Norway. The term of set-asides/deductions consist of the following details:

- a. From the reported emission reduction results, set-aside/deduction of 20% to reflect the risk of uncertainty in estimates;
- b. In terms of deduction to reflect the risk of leakage, Indonesia Norway agreed to not include this deduction due to the baseline and performance of REDD+ in the Indonesia – Norway partnership being counted in the national-level accounting. Therefore, 0% deduction to reflect the risk of leakage is set. The 0% deduction from leakage was also consistently used in



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Indonesia's national FREL and REDD+ Performance in the 2nd BUR (Biennial Update Report) that was submitted to UNFCCC as Indonesia's approach for REDD+ implementation in the national level;

c. In terms of reflecting Indonesia's ambition to reduce national GHG emissions, Indonesia and Norway agreed to deduct 15%.

AENOR's audit team can confirm that the three items described above have been obtained through the MRV Protocol Annex /3/.

As systems are developed over time, and policies and strategies are put in place to reduce uncertainty risk, risk of leakage, and reflection of Indonesia's ambition, the set-aside factor can be reduced. Based on the first reporting period under the Indonesia – Norway partnership, the total set aside factor of 35% will be applied.

After applying double claiming deductions (see Section 3.12 above), double claim indications for the 2017/2018 period amounted to 736,641 tCO2-e and in the 2018/2019 period amounted to 291,831 tCO2-e. The total ER calculation results will be 75,522,287 tCO2e for the 2017/2018 period and 209,856,132 tCO2e for the 2018/2019 period, total observation period (2017/2018 and 2018/2019) will be amount to 285,378,419 tCO2-e.

The emission reduction results later deducted 35%. Therefore, the total net emission reductions that could potentially be awarded would be 185,495,972 tCO2-e consisting of net emission reductions 49,089,487 tCO2-e in period 2017/2018 and 136,406,486 tCO2-e in period 2018/2019.

Result Period	RBP/C Baseline (tCO2)		Actual Emissions (tCO2)		Result (tCO2)		Total (tCO2e)	Risk of Double Claim (tCO2e)	Clean of Double claim (tCO2e)	Set Aside 35 %	Potential of RBP/C
	Deforestation	Degradation	Deforestation	Degradation	Deforestation	Degradation		ciaini (iCO2e)	ciaini ((CO2e)	(tCO2e)	(tCO2e)
2017/2018	236.946.787	40.974.680	140.859.913	60.802.625	96.086.874	-19.827.946	76.258.928	736.641	75.522.287	26.432.801	49.089.487
2018/2019	236.946.787	40.974.680	60.452.760	7.320.743	176.494.027	33.653.936	210.147.963	291.831	209.856.132	73.449.646	136.406.486
Total	473.893.574	81.949.359	201.312.673	68.123.369	272.580.901	13.825.991	286.406.892	1.028.473	285.378.419	99.882.447	185.495.972

The audit team reproduced the calculations to achieve the same results and deems they are clearly and correctly depicted in the REDD Spreadsheet Calculations /8/ and the ERR /1/. AENOR considers that the formula is used in compliance with the criteria defined in Section 1.3.

Therefore, AENOR deems that the calculated emission reduction, after applying risk of double claiming and set asides, consisting of net emission reductions 49,089,487 tCO2-e in period 2017/2018 and 136,406,486 tCO2-e in period 2018/2019, are correct.

AENOR verified the parameters used in the calculation and references to documents where they are used or explained, through the review, reproduction and cross-checking of the evidence provided by the MoEF. AENOR checked that the values of these parameters are appropriate and are used correctly in the equations.

AENOR found no inconsistencies between the information reported in the ERR /1/ and the REDD spreadsheet calculations /8/.

After a thorough and comprehensive review and replication of calculations, AENOR considers that the monitored parameters available are correct, credible and consistent. Therefore, AENOR deems that the reported results are credible, consistent and accurate.



VERIFICATION REPORT

Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

## 4. VERIFICATION CONCLUSION

AENOR has verified that the estimation of the emissions from gross deforestation and from gross forest degradation at national level for the period 2006/2007-2015/2016 and 2017/2018 and 2018/2019 monitoring periods and the emission reduction from reduced deforestation and reduced forest degradation for the monitoring periods 2017/2018 and 2018/2019 have been carried out in compliance with the criteria set in Section 1.3.

Therefore, AENOR is able to confirm that the RBP/C baseline and 2017/2018 and 2018/2019 emission reduction have been determined in a consistent, transparent and reproducible way and that are correct, credible and free from material errors, omissions and/or false statements.

The verification process was carried out in the following phases: i) a documentary review of all the material provided by the MoEF; ii) in-country interviews with the team responsible for monitoring and reporting; iii) reproduction of the calculations; iv) the resolution of pending issues and v) the issuance of the report and final verification opinion. In the course of the verification process, clarifications were found and properly closed.

AENOR is able to issue a positive verification opinion for the **RBP/C baseline of 277,921,466 tCO<sub>2</sub>e/year** (236,946,787 tCO<sub>2</sub>e/year from deforestation and 40,974,680 tCO<sub>2</sub>e/year from forest degradation) and for the **2017/2018 and 2018/2019 monitoring periods emission reductions of 75,522,287 tCO<sub>2</sub>e and 209,856,132 tCO<sub>2</sub>e,** after applying the discount for risk of double claiming, as reported in the *Emission Reduction Report for the Indonesia–Norway Partnership*/1/.

In accordance with the *MRV* protocol for the Indonesia-Norway partnership on climate, forests and peat /2/ and the Annex: Detailed steps for calculating results based payments under the Indonesia-Norway forest partnership /3/ and the application a 35% set-asides/deductions, AENOR is able to issue a positive verification opinion with a reasonable level of assurance for the Indonesia proposed net results of 49,089,487 tCO<sub>2</sub>e for the 2017/2018 monitoring period, and 136,406,486 tCO<sub>2</sub>e for the 2018/2019 monitoring period, for a total of 185,495,972 tCO<sub>2</sub>e.

Madrid, November 30<sup>th</sup>, 2023.

Daniel Bermejo Vesga Team Leader 1

Jose Luis Fuentes Project Manager



Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

## ANNEXES

### Annex 1: Recommendations for improvements in MRV system

During the verification process several improvement opportunities were identified for Indonesia-Norway MRV system by the audit team. These improvement options are to be considered additional to those stated in the Plan of the improvement of the *Emission Reduction Report for the Indonesia-Norway Partnership* /1/. The recommendations are listed according to the suggested implementation priority in opinion of the audit team:

- 1. Enforce the registration of both public and private REDD+ initiatives in the National Registry System on Climate Change and integrate the double-counting preventive measures into the MRV system. Although significant progresses have been made within the National Registry System as reported in Section 7.2 of the ERR /1/, AENOR's audit team raised concerns alongside the verification process of possible double accounting that was not identified preliminary by the MoEF, and corrective measures were implemented to properly it considered. Would it be appropriate to have a direct access to projects that have issued VERs, VCUs, carbon credits and/or others, within Indonesia in the same and different monitoring periods that applies to this RBP/C.
- 2. Include the carbon pools of below-ground biomass (BGB) and dead organic matter (dead wood and litter) in deforestation and forest degradation emissions calculation on future RBP/C. As part of the release of Indonesian 2<sup>nd</sup> FREL, deforestation, forest degradation and enhancement of forest carbon stock, decomposition of peat, fires (peat and minerals) in areas experiencing deforestation or forest degradation, and emissions from conversion of mangrove forests into cultivated areas have been considered. Moreover, new carbon pools are included, such as AGB, BGB, deadwood, litter, and soils. This information has been already gathered.
- 3. Consider including peat decomposition and peat fire emission estimates in future RBP/C, as they have been already reported in this RBP/C ERR in accordance with the MRV Protocol, even though results might provide in a case-by-case basis negative ER.
- 4. Compile and translate to English the procedures followed for the elaboration of the land cover maps, land forest cover change analysis and QA/QC. Providing public access in English to the procedures and methodologies followed would facilitate future verification process and would improve transparency towards third parties.
- 5. Provide a clear procedure in English to access all relevant items necessary to reproduce procedures and calculations, so that all stakeholders interested can access public data, not only third parties involved in audit processes. Public information means accessibility must be granted in a reasonable way.
- 6. In accordance with the Annex of the MRV Protocol /3/, improvements as those described in the "Activities, pools and gases included in the RBP/C baseline" Section should be specified in a MRV improvement plan that prepares for RBP/C baseline updates in line with point 2.6 of the MRV Protocol.



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### Annex 2: Analysis of the Plan of improvement

The auditor team has analysed the Plan of improvement for the Indonesia-Norway partnership MRV, included in the *Emission Reduction Report for the Indonesia-Norway Partnership* /1/.

Several relevant topics have been discussed, such as the following:

- 1. Progress made by producing the third BUR, including remote sensing technology to generate coverage for the total mainland area and improving EF by using new existing research.
- 2. The National Registry System has been developed to provide good carbon governance and a web-based emission calculation monitoring system is under construction. This item is relevant for the audit team, as it is related to one of the recommendations (number 1) regarding double accountability.
- 3. A legal framework for carbon-related activities and schemes in Indonesia is under the process, with several regulations related to carbon markets, providing specific procedures and guidelines for carrying out carbon-related initiatives and policies. The objective of MoEF is making sure Indonesia complies with FOLU Net Sink 2030 targets, reviewed by AENOR's audit team for understanding country-specific objectives.



# Annex 3: List of evidence provided

No.	Evidence
1	4th_Revised ERR Indonesia-Norway_as per 23 Nov 23_19_24_Clean.docx
2	MRV protocol for the Indonesia-Norway partnership on climate, forests and peat
3	Annex: Detailed steps for calculating results-based payments under the Indonesia-Norway forest partnership
4	National Forest Reference Emission Level for Deforestation and Forest Degradation In the Context of Decision 1/CP.16 para 70 UNFCCC
5	Report on the technical assessment of the proposed forest reference emission level of Indonesia submitted in 2016
6	Indonesia Third Biennial Update Report
7	Technical report on the technical analysis of the technical annex to the third biennial update report of Indonesia submitted in accordance with decision 14/CP.19, paragraph 7, in December 2021
8	Spreadsheet_REDD Norway_2006-2019_Final_Update Risk of Double Claim_as per 23 Nov 23_18_37.xlsx
9	Pivot DB GIS_DD_Norway 2006-2019_20230723_final.xlsx
11	DB_Fire_Peat_Norway_II.xlsx
12	Land cover maps at the NFMS webGIS (online)
13	Indonesia Report on REDD+ Performance
14	Indonesia National Registry System on Climate Change
15	National Forest Monitoring System (NFMS) for Land Based Sector
16	Margono, B.A., et al. (2016). Indonesia's Forest Resource Monitoring
17	akurasi-data-penutupan-lahan-nasional-tahun-1990-2016.pdf
18	Definition_Method_Landcover.pdf
19	Juknis Penafsiran Update Data PL 2020 Final.pdf
20	Land Cover Process.pdf
21	petunjuk-teknis-penafsiran-citra-satelit-resolusi-sedang.pdf
22	petunjuk-teknis-pengecekan-lapangan-hasil-penafsiran-csrs.pdf
23	potensi-sdh-indonesia-dari-plot-ihn.pdf



### **Annex 4: Reference documentation**

No.	Document				
1	ISO 14064-3:2019 Part 3: Specification with guidance for the verification and validation of greenhouse gas statements (2019)				
2	ISO 14065:2020 General principles and requirements for organizations that carry out the validation and verification of environmental information				
3	ISO 17029 Conformity assessment — General principles and requirements for validation and verification bodies				
4	2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006)				
5	2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands (2013)				
6	2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006)				
7	IPCC Good Practice Guidance and Uncertainty Management in National GHG Inventories (2000)				
8	GFOI 2016 Methods and Guidance Document (2013 and 2016) and supplementary modules				
9	REDD decisions and MRV decisions under the UNFCCC, including the Enhanced Transparency Framework of the Paris Agreement				
10	GOFC-GOLD REDD Source Book (2015)				
11	GFOI Integrating remote-sensing and ground-based observations for estimation of emissions and removals of greenhouse gases in forests: Methods and Guidance from the Global Forest Observations Initiative (2014)				
12	The Technical Assessment of the FREL presented to the UNFCCC				
13	The reference level submitted to the UNFCCC, including the historical average deforestation level and the results-based payment/contribution baseline of the Indonesia-Norway Bilateral Agreement				
14	The Third Biennial Updated Report under the UNFCCC (2021)				
15	MRV protocol as agreed under the MoU and Contribution Agreement between Indonesia and Norway and reporting requirements and agreed format for reporting (see ToR), as agreed in the MRV-protocol and its annex.				

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# Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

## **Annex 5: Attendance lists**

No.	NAMA	INSTANSI	NO. TELP / HP	TANDATANGAN
1	2	3	4	5
1	Belinda AM	IPSDH		generic
2	Vanda Muli			the
3	DAN WIBBLD	mump		7
4	Rully Dhora C	IGRUE MPV	081340344846	Pulz.
5				10 0
6	Anna Tosiani	(PIDH	0817468964	ARM
7	Wanyu Marjaka	msin		up
8	Sdichin Manun	Konsultan	081367787638	AG
9	Wahren Edher A	BPM/	288200998180	K
10	Dawel Bermejo Vesga	CORD NOTION	+34 652987523	Dough
11	Wagar Ahmed	AENOR Regional Expert	+92-333-2175881	lunger
12	Hendra Permana	Biro KLN	082(100 77450	the
13	RWA ROVANI	IPSOH	0857595773339	Mut
14	Dirra Kurniawahi	lerk mpv	0813 82767180	den
15	LOLITA RATNASARI	IGRK-MPV	085640528500	(Panin)
16				1 - 4
17				
18				
1.9				
20				

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**VERIFICATION REPORT** 

# Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

HOJA DE PRESENCIA	PRESENCE SHEET		
fueron proporcionadas imparcialm	ente sin la influencia o la presión	de partes interesadas.	le la mejor manera posible. Las respuest
1.4			s. The answers were provided unbiased $(M + F)$ To Kurfra
Lugar/Location: RKK	IK Carbou House,	Wanadakti Buildin	g ( not i ) journal cot
Fecha/Date: 05/1	0/23		ACKION
Equipo Auditor/Audito	r Team: Daniel Be	rmejo, Wagar Al	umed / maint
Nombre/Name	Teléfono/Phone	Empresa/Company	Firma/Signature
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LOLITA RATNASARI	+6285640528500	MOEF	Pan
			) (
1 s			
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# Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

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### HOJA DE PRESENCIA/PRESENCE SHEET

Por la presente firmo que he respondido a las preguntas del equipo auditor de manera libre y verdadera y de la mejor manera posible. Las respuestas fueron proporcionadas imparcialmente sin la influencia o la presión de partes interesadas.

I hereby sign that I have answered the auditor team's questions freely and truly to the best of my abilities. The answers were provided unbiasedly without the influence or pressure of parties.

Lugar/Location: RKKIK Carbou House, Wanabakt' Building (MO(F), Jakarta Fecha/Date: 06/10/23

Equipo Auditor/Auditor Team: Daniel Bernijo, Wagar Alimed, AENON

Nombre/Name	Teléfono/Phone	Empresa/Company	Firma/Signature
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# Annex 6: Findings

Clarifications (CLs)

CL ID	01	Date: 24/10/2023				
CL description						
	Alongside the ERR, references to periods are made in the form of "2006/2007", "2015/2016", "2016/2017", and other non-clarifying ways of reporting monitoring periods.					
and others, following be	The ERR shall be updated to provide clear references to baseline periods, monitoring periods and others, following best international practices, clearly referring the start date and end date of each of the self-referred periods.					
Project proponent's res	sponse	Date: 06/11/2023				
	Thank you for the suggestion, the baseline period used by ERR for the activities data start date from 2006/2007 (1 July 2006 - 30 June 2007), with the end date is on 2015/2016 (1 July 2015 - 30 June 2016)					
	While the monitoring period start from 2016/2017 (1 Juli 2016 – 30 Juni 2017) until 2019/2020 (1 Juli 2019 – 30 Juni 2020)					
Whilst those reference period used in this ERR mentioned above, the reporting period for mitigation achievement is use the 2017/2018 (1 Juli 2017 – 30 Juni 2018) and 2018/2019 (1 Juli 2018 – 30 Juni 2019) period.						
Meanwhile, capaian 201	Meanwhile, capaian 2016/2017 telah laporkan pada 1st ERR (previous ERR)					
These periods refer to the data source of National Forest Monitoring System $ ightarrow$ dokumen NFMS dari IPSDH						
Documentation provided by the project proponent						
We add the information needed in to Chapter 2.4.2 as follows:						
RBP/C baseline was determined using data from the reference period spanning from 2006/2007 to 2015/2016. The data source to produce the annual land cover map (e.g period 2015/2016), is Landsat imagery with acquisition date from June to July one year after. Therefore, the start date of RBP/C baseline period is from 2006/2007 (1 July 2006 - 30 June 2007), with the end date is on 2015/2016 (1 July 2015 - 30 June 2016).						
The period selection has considered the following aspects: (1) availability of land-cover data that is transparent, accurate, complete and consistent, (2) reflection of the general condition of forest transition in Indonesia, and (3) the length of time that could reflect the national circumstances, policy dynamics and impacts (biophysical, social, economic, political and spatial planning), as well as associated carbon emission. This RBP/C baseline interval period is arrange following the MRV protocol Annex : Detailed steps for calculating results based payments under the Indonesia-Norway forest partnership. All of the documentation used is available on this link : https://nfms.menlhk.go.id/download						
vvB's evaluation	VVB's evaluation					

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The audit team has reviewed the clarifications provided within the findings sheet, and the updates to Section 2.4.2. This way now is easier to understand the start date and end date of the reference period, and the start and end dates of each one of the verifications periods.

Thus, CL 01 is closed.

CL ID	02	Date: 24/10/2023				
CL description						
Annex 1, page 23 out of 40, states that "LUTM is derived (), covering two consecutive yea (e.g., 2012 - 2013). An example of the LUTM transition matrix for the period 2012-2013 ( whereas the information reported in Annex 1.4 and 1.5, and in the DB_Norway_II_LUT spreadsheet refers to deforestation and/or degradation periods of 2017-2018 in Ea Kalimantan Region. Updates within the ERR are required.						
Project proponent's res	sponse	Date: 06/11/2023				
Thank you for your tho	roughness, the mistake in the year writte	n will be corrected in the ERR.				
Documentation provid	ed by the project proponent					
We update the mistakes	s in the description of Annex 1 as follows:					
The estimation of emissions from deforestation and forest degradation, specifically from t loss of above-ground biomass, over a two-year period relies on the use of a land use transiti matrix (LUTM). The LUTM is derived from a spatial analysis of a series of land cover may typically covering two consecutive years (e.g. 2017 - 2018). An example of the LUTM transiti matrix for the period 2017 - 2018 is provided in Table Annex 1.4.						
VVB's evaluation	Date: 16/11/2023					
Corrections have been p	provided within the Emission Reduction R	eport (ERR).				
Thus, CLO2 is closed.						
CL ID	03	Date: 24/10/2023				

CL description
Section 3, Table 5 of the ERR, the information reported does not clearly explain the process for
directly computing the Total Emission Reductions both from deforestation and forest
degradation.

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Some steps are lacking within this table based on Spreadsheet\_REDD Performance\_Norway\_2006-2019\_20230723\_Final.

Provide further clarifying information.

Project proponent's response

Date: 06/11/2023

We appreciate for this finding, to clarify the readings of the result table, then we will improve the information regarding the process for computing the Total Emission Reductions both from deforestation and forest degradation in the Table 5 of ERR.

Documentation provided by the project proponent

### 3. Results

Emission reductions are calculated by deducting baseline emissions from actual annual emissions. Point 2.4.3 on the RBP/C Baseline mentions that the baselines for deforestation and forest degradation are 236,946,787 tCO<sub>2</sub>e.yr<sup>-1</sup> and 40,974,680 tCO<sub>2</sub>e.yr<sup>1</sup>, respectively.

Table 5Emissions reductions from deforestation and forest degradation for periods of 2017/2018 and<br/>2018/2019

Result Period	RBP/C Baseline (Million tCO2)		Actual Er	nissions	Res	Total	
			(Million tCO2)		(Millior	(tCO2e)	
	Deforestation	Degradation	Deforestation	Degradation	Deforestation	Degradation	
2017/2018	236.95	40.97	140.86	60.80	96.09	-19.83	76.20
2018/2019	236.95	40.97	60.45	7.32	176.49	33.65	210.1
Total	473.89	81.95	201.31	68.12	272.58	13.83	286.4

VVB's evaluation	Date: 16/11/2023
------------------	------------------

Table 5 of the Emission Reduction Report has been properly updated, and now clearly refers for both verification periods (2017/2018 and 2018/2019) the baseline emissions, actual emissions, the result and the total for Deforestation and Forest Degradation.

Thus, CLO3 is closed.

CL ID 04		Date: 24/10/2023					
CL description	CL description						
According to the MRV Protocol, Section 4, reporting shall cover emissions factors, rationale and data sources for estimation of emission factors.							
However, not enough ir with this requirement.	However, not enough information has been included within Section 2.3.2 of the ERR to comply						
Further information is r	equired.						



## Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

#### Project proponent's response

Date: 06/11/2023

Thank you for this note, regarding to complete the information, we will update the ERR with more information into section 2.3.2 regarding the rationale and data sources for estimation emisión factors

#### Documentation provided by the project proponent

We elaborate the information needed in to Chapter 2.3.2 as follows:

The emission factors for deforestation and forest degradation, mainly Tier-2 EFs were used in the analysis. From 1989 until 2013, more than 3,900 clusters of sample plots have been developed which are distributed on 20x20 km, 10x10 km and 5x5 km grids across the country (Ditjen Planologi Kehutanan, 2014). Each cluster consists of a permanent sample plot (PSP) with a size of 1ha surrounded by 8 temporary sample plots (TSP). A total of 4,450 measurements of PSPs from NFI (1990-2013) across the country were available for data processing and analysis. Additional forest research data especially for mangrove forests in Indonesia had to be used since the amount of PSP records for this forest type was statistically not sufficient.

The AGB of individual trees in the plots were estimated using allometric model developed for tropical forest (Chave et al., 2005), which used diameter at breast height (DBH) and wood density (WD) of the species as the key parameters. However, the availability of local allometric models specific for six forest types was not given for all seven main islands of Indonesia so the generalized allometric model of Chave et al. (2005) was selected instead. This model has been found to perform equally well as local models in the Indonesian tropical forests (Rutishauser et al., 2013; Manuri et al., 2014). Further information regarding forest carbon stock can be found in the Annex 31.

The emission factor for deforestation was calculated by using the losses of the carbon stock from the deforested forest, while the emission factor for the forest degradation was calculated by using the difference in carbon stock between primary forest and secondary forest. The conversion factor from C to CO2 by using the 44/12. Detailed emission factors used for deforestation and forest degradation can be found in Table 2 and Table 3, respectively.

|--|

New information has been included regarding about EF, sampling plots (both permanent and temporal) used from the Indonesian NFI, measurements, allometric equations and differentiations from deforestation and forest degradation, among other topics. Everything has been supported with relevant consistent types of evidence, particularly the FREL and the 3<sup>rd</sup> BUR.

Thus, CLO4 is closed.

<sup>&</sup>lt;sup>1</sup>https://redd.unfccc.int/media/frel\_submission\_by\_\_indonesia\_final.pdf



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CL ID	05	Date: 24/10/2023					
CL description	CL description						
Section 3.3 of the MRV Protocol requires that the ERR shall describe the NFMS, including how it builds on existing systems and a description of the respective roles and responsibilities of institutions included in the NFMS. Moreover, it requires a description of QA/QC assurance activities.							
the relevance of ground	he ERR briefly introduces QA/QC activitie l-truth points (and the people responsible is are not properly clarified within the ER ocuired	e for making this assessments)					
Project proponent's res	-	Date: 06/11/2023					
We appreciate this fir	ding. we will put additional informati any other requirements into Section 4 o	l					
Documentation provid	ed by the project proponent						
Documentation provided by the project proponent We update the information into Section 4 as follows : The Quality Assurance (QA) and Quality Control (QC) processes are carried out on the processes of producing land cover data, carbon stock data, and the GHG emission calculation process. For land cover data, QC is carried out at the regional office level at BPKH and QA is carried out by Forest Resources Inventory and Monitoring Directorate of MoEF. In the QA process by the Forest Resources Inventory and Monitoring Directorate, an assessment of overall accuracy and kappa analysis are also carried out using of 5000-10,000 samples. For emission factors, QC is carried out at the plot level (PSP) by the regional office. The data generated at the plot level is in the form of biomass volume. Furthermore, hectare biomass volume data per stratum was converted using a certain allometric into carbon stock data by involving QC from academics of the University and the National Research and Innovation Agency Indonesia. Plot data from regional offices was compiled nationally and subjected to QC and QA by Dit. The QA process involves forest biometric experts from academics of the University and the National Research and Innovation Agency Indonesia. For the GHG emission calculation process, QC was carried out involving the GHG Inventory & MRV Directorate and the Forest Resources Inventory and Monitoring Directorate. Each calculation involves at least 3 people or personnel independently. This process is then followed by a joint discussion of the results of each calculation. If there is a discrepancy, it will be traced until it finds a result that is not discrepant. As for QA, it is carried out by involving external experts from MRV specialist practitioners, academics, and the National Research and							
VVB's evaluation		Date: 16/11/2023					
	een provided, clarifying relevant topics r stock data and GHG emission calculation r						



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CL ID	06		I	Date: 24/10	0/2023				
CL description									
The Annex of the MRV Protocol states that, from the reported ER, deductions shall be applied to reflect the risk of uncertainty (20%) and to reflect Indonesia's ambition to reduce national GHG emissions (15%).									
However, no information has been reported about these requirements within the ERR.									
Project proponent's res	ponse		I	Date: 06/12	1/2023				
	Thank you for this note, we will add the deduction applied into the ER calculation and updated the information in the ERR text.								
Documentation provide	ed by the project pro	oponent							
we have added the information related to applied deduction to the ER result as follows:As mentioned in Chapter Results, Indonesia has reduced the emissions from deforestation and forest degradation in total observation period (2017/2018 and 2018/2019) amount to 286,406,892 tCO2-e. This result comes from 76,258,928 Ton CO2e for 2017/2018 period and 210,147,963 in 2018/2019. The emission reduction results later deducted 35%. Therefore, the net results amounted to 49,568,304 tCO2-e in period 2017/2018 and 136,596,176 tCO2-e in period 2018/2019 tCO2-e.For your reference, those calculation number can be found in the spreadsheet (Sheet name: RBP/C Baseline+ER)Total (tCO2)Actual Emissions (tCO2)Result (tCO2)Total (tCO2e)Set Aside 35 % (tCO2e)Potential of RBP/C Baseline (tCO2)Actual Emissions (tCO2)Result (tCO2)Total (tCO2e)Set Aside 35 % (tCO2e)Potential of RBP/C (tCO2e)Total (tCO2)Actual Emissions (tCO2)Result (tCO2)Total (tCO2e)Set Aside 35 % (tCO2e)Potential of RBP/C (tCO2e)Potential of RBP/C (tCO2e)Total (tCO2)Actual Emissions (tCO2)Result (tCO2)Total (tCO2e)Set Aside 35 % (tCO2e)Potential of RBP/C (tCO2e)TotalRe									
VVB's evaluation			I	Date: 16/11	L/2023				
Section 8 has been updated, to consider the relevant deductions that shall be apply for both verification periods, 2017/2018 and 2018/2019. Initially, it was stated a total amount of emission reductions, for both periods, and also for deforestation and forest degradation, of 286,406,892 tCO2e. With the new corrections, there is a deduction of 100,242,412 tCO2e, allowing a final 186,164,479 tCO2e. However, until CL10 is closed, CL06 cannot be closed, as the information reported within Section 8 and alongside the text might not be correct and accurate. Thus, CL06 is not closed.									
Project proponent's res	ponse		Dat	te: 23/11/2	023				

Thank you for proposing a way for calculating double-claims. However, based on our findings,



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not all projects provide KML files, thus we sought for alternatives using a proportional method.

Potential double claims for 336.312 (2017/2018) and 291.831 (2018/2019) determined by using the proportion of ER based on the total ERR. The proportion of potentially double-claimed area is obtained from the areas that has made claims compared to the total area covered in the ERR calculation, which is the national natural forest area in 2006 (the beginning of the reference period).

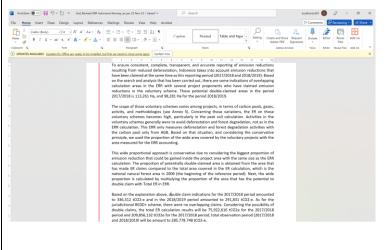
The proportion approach is used with the assumption that the entire area that is the calculation area has the same potential to produce ER. So, if in the calculation there are a number of overlapping areas, the potential double-claim ER can be calculated as a proportion of its area to the total ER.

Looking at these concerns, it is clear that the various schemes (which will be added in the Annex of ERR) described have distinct activities or methodology, carbon pools, and types of gas that are estimated to emission reductions calculation. Areas that consider peat soil carbon pools, for example, will result in emission decreases, although these carbon pools are not considered in national ERR estimates. Aside from that, almost all schemes calculate activities based on emission calculations from avoid deforestation and forest degradation activities or avoid deforestation plans, whereas those calculated nationally, activities based on deforestation and degradation, and carbon pools are only calculated by AGB.

By looking at these considerations, it is based on the fact that the various schemes that have been identified have different activities or methodologies used, carbon pools, and types of gas that are calculated to estimate emission reductions. For example, areas that take into account peat soil carbon pools will result in emission reductions, while these carbon pools are not taken into account in national ERR calculations. Apart from that, the activities calculated by almost all schemes apply emission calculations from avoid deforestation and forest degradation activities or avoid deforestation plans, while those calculated nationally, the activities calculated from deforestation and degradation, and carbon pools are calculated only by AGB. Thus, the approach is considered appropriate and quite conservative in considering the potential for double claims regarding emission reduction results in overlapping areas.

#### Documentation provided by the project proponent

The information above will be included to the ERR.



Also added information in the Annex 5 as shown below:



# Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

8	Carbon Standart/Registry	Project Name	Location	Area ( Ha)	Activity / Methodology	Carbon Pool	Gases	ER Reporting Period	Potential o area 2017/2018	(Ha)
	Jurisdictional REDD+ FCPF World Bank/CATS	FCPF Carbon Fund	East Kalimantan	12,746,546	REDD+	AGB, SOC	CO2	1 July 2019-31 Aug 2020	0	0
	ISFL - World Bank/-	Jambi Sustainable Landscape Management Project (J-SLMP)	Jambi	2,082,286	REDD+ISFL	AGB, BGB, SOC	CO2	Not yet reported	o	0
B	Voluntary Carbon Satndard	d								
1	Gold Standard/Impact Registry	No Project type under A/R or REDD+							0	0
2	Plan Vivo / Markit Registry	Rimbak Pakai Pengidup Project	West Kalimantan	1,430	ADD	AGB, BGB	CO2	01/01/2018 - 31/12/2018		1,430
				1210250	1992/07/02/07	101020-002020-0				210.00
		Bujang Raba Community PES Project	Jambi	5,336	ADD, PES	AGB, BGB	CO <sub>2</sub>	01/01/2017 - 31/12/2017 01/01/2018 - 31/12/2018 01/01/2019 - 31/12/2017		5,336
		Durian Rambun	Jambi	3,616	ADD, PES	AGB, BGB	CO2	01/01/2015 - 01/09/2018	3,616	3,616
3	Verra/VCS	Katingan Peatland Restoration and Conservation Project	Kalimantan Tengah	14,980	ARR; REDD; WRC / VM0007	AGB, Peat SOC	CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> C	0 01/01/2017 - 31/12/2017	14,980	0
		Rimba Raya Biodiversity Reserve Project	Kalimantan Tengah	64,977	REDD - APD / VM0004	AGB, Peat SOC	CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> C	01/01/2018 - 31/12/2018 23/06/2017 - 31/12/2017 01/01/2018 - 31/12/2018	64,977	64,977
		Sumatra Merang Peatland Project	Sumatera Selatan	22,922	ARR; WRC / VM0007	AGB, Peat SOC	CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> C	01/01/2019 - 30/06/2019 0 01/01/2017 - 31/12/2017		22,922
		(SMPP)								
	TOTAL Avoided Plan Deforestaton Avoided Deforestaton and F				Afforestation, Reforestation Wetlands Restoration and C	and Revegetation		01/01/2018 - 31/12/2018		98,281
	Avoided Plan Deforestaton			ARR		and Revegetation			8	98,281
DD	Avoided Plan Deforestaton	orest Deeradation		ARR		and Revegetation			113,261	
	Avoided Plan Deforestaton Avoided Deforestaton and F B's evaluat typo regar rected. Ind mber is 149	tion ding Katingan onesia team rep ,800 ha, ten time	ported t es larger.	ARR WRC	wetlands Restoration and C storation a he area (h	and Revegetation onservation nd Cor a) is 14	Da 1serv 4,980	ate: 23/11/ ate: 23/11/ ation Proj D ha. How	113,261 2023 ect r	need
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v tor: ur he	Avoided Plan Deforestaton Avoided Deforestaton and F B's evaluat typo regar rected. Ind mber is 149 e spreadshe 1s, CLO6 is r	tion ding Katingan onesia team rep ,800 ha, ten time eets and the ERR	ported t es larger.	ARR WRC	wetlands Restoration and C storation a he area (h	and Revegetation onservation nd Cor a) is 14	Da nserv 4,980 T this	ate: 23/11/ ate: 23/11/ ation Proj D ha. How	<sup>113,261</sup> 2023 ect r ever,	need the



# Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

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Home / Verified Carbon Standard / Project 1477		
KATINGAN PEATLAND RESTORATION AND CONSERVATION PROJECT	PROJECT SUMMARY	
Au Seruyan Raya Seruyan Raya Mitri Utara	State/Province Central Kalmantari VCS Proponent P1: Rimos Malamur Utama (P VS) Project States Registered Verse Insuarge Remots	5
The Katingan Restoration and Conservation Project (The Katingan Project) protects and renover 449,800 heck les of peratand ecosystems, to offer local communities sustainable sources of income, and to saked global to use dravogs TP project is within the districts (Grangan and Grazwarrigan Timur in Central Kalimantan Province and covers due of the largest remaining inter peat swamp forests in Indonesia	7451846	
The project was open for public comment from 27/67/2020 to 26/00/2020. Any comments received have been uploaded in the "Other Documents" section below.	AFOLU Activity ARE, REDD; WRC VCS Methodology VM0007	
VCS PIPELINE DOCUMENTS	Acres/Hectares 14980 Hectares Vocument Validator SCS Global Services	

We should have taken the data at the bottom of the map (green mark) but we took the data in the project summary (red mark).

We have corrected it in the Katingan Peatland Restoration Project area in the spreadsheet and updated the calculation figures affected by the typo.

Documentation provided by the project proponent

#### VVB's evaluation

Date: 24/11/2023

The new data reported is accurate and properly refers double accountability risks. The procedure applied is appropriate, considering the risk of accounting carbon pools not applicable to the ERR and under the MRV Protocol.

Thus, CLO6 is closed.

CL ID	07	Date: 24/10/2023
CL description		

Section 3.5 and 3.6 of the MRV Protocol states that:

- Description of methodologies (including the reference data) used to analyze the uncertainty of the estimates of the change detection.
- Discussion of key uncertainties, their sources and impacts.

However, the information included within Table 7 is insufficient, considering the aspects disclosed within UNFCCC reported documentation and including a 41-page document shown during the on-site visit that reports relevant and specific information about how Indonesia has reduced uncertainty during the period 1990-2016, the 10.000 sampling plots, the selection of



VERIFICATION REPORT		ation of reduced emissions nd forest degradation			
30 samples per region, etc.					
Provide further information and sha	ire relevant evidence.				
Project proponent's response		Date: 06/11/2023			
Thank you for this finding, please clarify, since there is no Table 7, do you mean is Table Yes then we will update the specific information and description related about how Indor has reduced uncertainty into the ERR.					
Documentation provided by the pr	oject proponent				
We added information and reference samples. Detailed inform <u>https://nfms.menlhk.go.id/admin/fi</u> tahun-1990-2016.pdf.	nation refer to	this link below			
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2016					
sampel yang dibuat bersama oleh KLHK, LAPAN dan University of	rian Lingkungan Hidup dan Kehutanan (KLHK) tahun 1990-2016 dengan menggu Maryland (UMD). Data referensi ini dibangun dengan mosaik data Landsat beba Google Earth. Quality Control dan Quality Assessment data referensi dilakukan d	is awan tahun 1990-2016			
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VVB's evaluation		Date: 16/10/2023			
New and accurate information has b	een included.				
Thus, CLO7 is closed.					

CL ID08Date: 24/10/2023CL descriptionUncertainty reported data within Table 6 of the ERR was based on the Uncertainty<br/>Calculation\_Norway\_II\_20230725 spreadsheet shared with the audit team.However, the reported data within Table 6 has missing information and some minor mistakes,



#### Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

comparing the information with the spreadsheet.

Update both Table 6, Section 7.1 of the ERR and the spreadsheet as necessary.

Project proponent's response

Date: 06/11/2023

Thank you for this note, we will improve the minor mistakes and updated the information within Table 6 and spreadsheet as necessary.

Documentation provided by the project proponent

We have updated the spreadsheet with the updated ones and that sheet has been integrated to others in the spreadsheet file.

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'VB's evaluation	Date: 16/11/2023
nformation is now consistent between the ERR and the spreads	sheets.

Thus, CLO8 is closed.

CL ID	09 Date: 24/10/2023									
CL description										
information, and interc	The information reported within Annex 4, at the end of the ERR, requires further clarifying information, and interconnections with shared spreadsheets with the audit team and reported UNFCCC documentation, to be clearly assess.									
Project proponent's res	sponse	Date: 06/11/2023								

Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

Thank you for this finding, to clarify the information we will put additional description related and sheet needed for the annex table 4 into the spreadsheets.

#### Documentation provided by the project proponent

We have already added table annex 4 to the previous spreadsheet that has been shared so that the emission factor used in the analysis has referred to table annex 4 automatically. As for additional information, we have already added sheets for the uncertainty calculation to the spreadsheet.

Here is as attached the picture of the table annex 4 and the sheet of uncertainty calculation as evidence. For further information, we will share the updated spreadsheet.

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at Papua Sulawesi		239.1 275.2	227.6	250.6 288.1	162 221	5%								
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Kalimantan		203.3	196.30	210.30	608	3%								
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t Papua Sulawesi		180.4 206.5	158.40 194.30	202.40 218.70	60 197	12% 6%								
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Annex 4 and the spreadsheet have been properly updated. Thus, CLO9 is closed.

CL ID		10		Date: 24/10/2023
CL desc	ription			
• <i>P</i> t p • F	a national syste hat <b>no double</b> artnerships oc Rewarded emis ransparency a	<b>counting to emission reduc</b> curs. sions reductions should be a	tions delive registered i	vide transparency and certainty ered under other agreements or n the Lima Info Hub to ensure <b>cemission reductions</b> delivered
6. More • T r	over, Section 3	8.2 of the MRV Protocol states sistent, complete, <b>transpar</b> lting from reduced deforesta	that: ent and a	<b>ccurate</b> reporting of emission ther performance indicators, as
7. Rega durir Artic envir	rding REDD+ ng COP meeting le 6.4 of the	decisions, double counting l gs, including Cancun COP16 e Paris Agreement (COP26)	and Durban provides	entioned on several occasions COP17. Closer to this moment, guidance on how to ensure , considering also corresponding
proce very	eeding with en sensitive topic	nission reduction claims. As	such, doub to be define	ing best practice available for le accounting and claiming is a ed as one of the most important
site visit the audi has happ	through direc t team require bened during th	t conversation with Indones s further information to pro	ia ERR tear vide assura ider assess:	nation compiled during the on- n experts and the desk-review, ance that no double accounting ment with other agreements or reductions.
Evidence	e shall be share	d with the audit team.		
Methodo	logical explana	ations shall be provided withi	n this findir	ng sheet and the ERR.
Project p	proponent's re	sponse		Date: 06/11/2023
Thank y issue, as		e, we will provide in the ER	R the relate	ed explanations needed for this
P	FOLU projects	in Indonesia during the mo	nitoring per	egistry, regarding payment for riod. If there are any payments ate those payment based on the

## Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

proportion by national wide. The proportion of the area will be considered as the deduction or set aside from total ER during the monitoring periods.

- 2. We regulate the double counting issue in our Minister Regulation No 7/2023 regarding Carbon Trading in Forestry Sector.
- 3. In our National Registry System, we require the project owner to register all activities regarding the mitigation action, including to upload the polygon of the carbon accounting area.

#### Documentation provided by the project proponent

To avoid double payment of emission reduction, we checked on the various registries e.g. Redd+ Web Platform, Verra registry, and Markit Registry, etc. for example, the emission reduction in 2017/2018 and 2018/2019 in Verra registry was found that payments of emission reduction project in Indonesia have been paid.

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	HON	ME FAC	CT SHEETS		H PLATFORM	M MEETINGS CONTACT	
	Reportin	ig to the UNFL					
	Date (Year)	Results (t CO2 eq/year)	Assessed forest reference level (t CO2 eq/year)	Quantities for which payments were received (I CO2 eq/year)	Entity paying for results	Links to documentation	
	2013	48,978,427	568,859,881		-	FCCC/SBI/ICA/2019/TATR.1/IDN	
	2014	48,978,427	572,355,503	6,750,000	Green Climate Fund (funding proposal)	Biennial update report with submission of REDD+ results (BUR 2) FCCC/TAR/2016/IDN	
	2015	48,978,427	575,851,125	6,750,000	Green Climate Fund (funding proposal)	Submission on proposed reference level Modified submission on proposed reference level	
	2016	48,978,427	579,346,747	6,750,000	Green Climate Fund (funding proposal)	Safeguards information summary Third National Communication (including Safeguards information summary)	
	2017	48,978,427	582,842,369		2	National REDD+ Strategy	
	2018	192,483,053	586,337,991			FCCC/SBI/ICA/2022/TATR.2/IDN	
	2019	192,483,053	589,833,613		-74	Biennial update report with submission of REDD+ results (BUR 3) FCCC/TAR/2016/IDN	
	2020	192,483,053	593,329,235	*		Submission on proposed reference level Modified submission on proposed reference	



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Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

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The ERR has not been updated to consider the risk of double claiming.

Unless Indonesia Team can provide solid evidence that the same emission reductions claimed by other voluntary and/or jurisdictional projects will not be double count by the verification periods claimed within the ERR, the following steps are required:

- 1. Indonesia team must make an analysis of the exact amount of verified emission reductions that have been already claimed by voluntary or jurisdictional carbon projects within the same areas and activities covered, land cover classes, carbon pools and gases, and always considering the applicable conditions of the MRV Protocol and the statements within the ERR (only for the two verification periods claimed by Indonesia team on the ERR, 2017/2018 and 2018/2019). Indonesia must consider all the voluntary and jurisdictional carbon standards that might be operating on the country, not only Verra (e.g., Gold Standard, the FCPF World Bank, etc.).
- 2. Indonesia shall share evidence of this analysis to the audit team, so that it can be confirmed that all voluntary and jurisdictional projects have been properly considered to proceed with the deduction of the gross total emission reductions (286.4 million tCO2e, before applying the 35% discount).
- 3. The spreadsheet calculations shall also be updated and shared to take into consideration this possible double counting reality. The audit team shall be capable to reproduce the steps taken to transform the gross total emission reductions (before applying the 35% deduction) to net total emission reductions free of double accounting (before applying the 35% deduction and also after applying it).
- 4. All this process shall be disclosed within the ERR, explaining how Indonesia has assured that all the claimed emission reductions within the ERR are free of double counting, quoting the analysis made for assuring that everything is in accordance with the MRV Protocol, best practices available and other relevant criteria as described within the Audit Plan.

VERIFICATION REPORT

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Thus, all sections of the ERR affected by possible double counting shall be updated to provide clarity and reality.

5. All the numbers referring to deforestation and forest degradation within the ERR shall be corrected to discount the already claimed emission reductions by other voluntary and/or jurisdictional projects.

Finally, CLO6 is not closed as the data reported does not consider the risk of double counting, and might require a deduction for being properly quoted within the ERR.

Thus, CL10 is not closed.

#### Project proponent's response

Date: 20/11/2023

Thank you for the evaluation by the AENOR team. We have updated the ERR by considering the potential double claiming in the same ER calculation area as the existing voluntary schemes (Verra, Gold Standard and Plan Vivo) in the section 8. For Jurisdictional REDD+ (FCPF and BioCF) there are no potential double claims as both jurisdictional schemes started ER claims from 1 July 2019, while ERR claims ended on 30 June 2019. All evidence can be found in the excel file (Spreadsheet\_REDD Norway\_2006-2019\_Final\_Update Risk of Double Claim\_20231119.xlsx) on the sheets tab :

Recap\_Jurisdiction\_Voluntary Gold Standard Plan Vivo Project PV Rimbak PV Bujang Raba PV Durian Rambun PV Gula2 Verra Standard DB\_Indonesia\_all\_VCUs Pivot\_VCUs

The calculation for considering potential double claim can be found in the tab sheet named 'RBP/C Baseline + ER'.

Risk Analysis of	f Double Clair	n
	2017/2018	113,261
Area Overlap (Ha)	2018/2019	98,281
Area ERR (All Natural Forest 2	.006)	96,454,143
Emission Reduction	2017/2018	76,258,928
Emission Reduction	2018/2019	210,147,963
Total ER		286,406,892
Descenters of everles by ever	2017/2018	0.12%
Percentage of overlap by area	2018/2019	0.10%
Potential of Doble Claim (tCO2e)	2017/2018	336,312
	2018/2019	291,831
Total ER minus Double Claim	2017/2018	75,922,616
Total EK minus Double Claim	2018/2019	209,856,132

Result Period	RBP/C Baselir	ne (tCO2)	Actual Emiss	ions (tCO2)	Resul	t (tCO2)	Total (tCO2e)	Risk of Double Claim (tCO2e)	Clean of Double claim (tCO2e)	Set Aside 35 %	Potential of RBP/C
	Deforestation	Degradation	Deforestation	Degradation	Deforestation	Degradation		claim (tCO2e)	ciaim (tCO2e)	(tCO2e)	(tCO2e)
2017/2018	236,946,787	40,974,680	140,859,913	60,802,625	96,086,874	-19,827,946	76,258,928	336,312	75,922,616	26,572,916	49,349,700
2018/2019	236,946,787	40,974,680	60,452,760	7,320,743	176,494,027	33,653,936	210,147,963	291,831	209,856,132	73,449,646	136,406,486
Total	473,893,574	81,949,359	201,312,673	68,123,369	272,580,901	13,825,991	286,406,892	628,144	285,778,748	100,022,562	185,756,186
	RBP/C Baseline	e (MtCO2)	Actual Emissio	ons (MtCO2)	Result	(MtCO2)		Risk of Double	Clean of Double	Set Aside	Potential of
Result Period	Deforestation	Degradation	Deforestation	Degradation	Deforestation	Degradation	Total (MtCO2e)	Claim (MtCO2e)	claim (MtCO2e)	35 % (MtCO2e)	RBP/C (MtCO2e)
2017/2018	236.95	40.97	140.86	60.80	96.09	-19.83	76.26	0.34	75.92	26.57	49.35
2018/2019	236.95	40.97	60.45	7.32	176.49	33.65	210.15	0.29	209.86	73.45	136.41
Total	473.89	81.95	201.31	68.12	272.58	13.83	286.41	0.63	285.78	100.02	185.76

#### Documentation provided by the project proponent



#### Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

#### VVB's evaluation

Date: 21/11/2023

The audit team has acknowledged that several modifications has been made within the ERR and the shared spreadsheets. However, there are still some concerns regarding compliance with double accountability. Specifically:

New spreadsheet tab defined as "Recap\_Jurisdiction\_Voluntary", summaries a "TOTAL" potential of double claimed (tCO2e) and potential as of double area (ha) for the two verification monitoring periods (2017/2018 and 2018/2019). The information is 11.583.307 tCO2e for 2017/2018 and 3.661.698 tCO2e for 2018/2019 for some projects listed in Verra and Plan Vivo registries. Relevant information about carbon pools (AGB, peat and SOC) and GHG gasses (CO2, CH4, N2O and others) have also been included. However, within Section 8 of the ERR, the following statement has been made:

" Based on the search and analysis that has been carried out, there are some indications of overlapping calculation areas in the ERR with several project proponents who have claimed emission reductions in the voluntary scheme. Double claim indications for the 2017/2018 period amounted to 336.312 tCO2-e and in the 2018/2019 period amounted to 291.831 tCO2-e. (...) Considering the possibility of double claims, the total ER calculation results will be 75.922.616 tCO2e for the 2017/2018 period and 209.856.132 tCO2e for the 2017/2018 period, total observation period (2017/2018 and 2018/2019) will be amount to 285,778,748 tCO2-e."

It is not clear for the audit team, the logical process that has been implemented to go through the following numbers, 11.583.307 (2017/2018) and 3.661.698 (2018/2019), reported within the spreadsheet, to 336.312 (2017/2018) and 291.831 (2018/2019), as has been reported in the ERR. Does it have any relationship with already sold VCUs? It is related to not applicable carbon pools and/or GHG gasses accounted by these voluntary projects and not accounted by the ERR in accordance with the MRV Protocol?

Explanations shall be included within the ERR, and the audit team shall access the procedure applied by Indonesia team both in the ERR and the spreadsheet. If any VCUs from voluntary projects have been excluded due to not sharing the same carbon pools as those described within the MRV applicable protocol, this information shall be reported and clarified. It shall be as clear as possible so that the audit team can achieve the same deduction that the country in technical terms.

The audit team is willing to have a quick call to resolve this open finding if it can be useful for all the parties to understand the open clarification.

Thus, CL10 is not closed.

Project proponent's response

Date: 23/11/2023

Thank you for proposing a way for calculating double-claims. However, based on our findings, not all projects provide KML files, thus we sought for alternatives using a proportional method.

Potential double claims for 336.312 (2017/2018) and 291.831 (2018/2019) determined by using the proportion of ER based on the total ERR. The proportion of potentially double-claimed area is obtained from the areas that has made claims compared to the total area covered in the ERR calculation, which is the national natural forest area in 2006 (the beginning of the reference period).

The proportion approach is used with the assumption that the entire area that is the calculation area has the same potential to produce ER. So, if in the calculation there are a



## Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

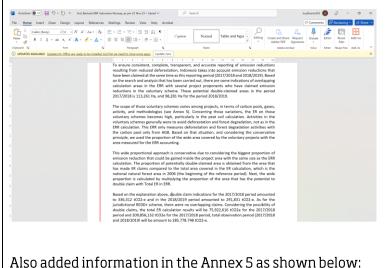
number of overlapping areas, the potential double-claim ER can be calculated as a proportion of its area to the total ER.

Looking at these concerns, it is clear that the various schemes (which will be added in the Annex of ERR) described have distinct activities or methodology, carbon pools, and types of gas that are estimated to emission reductions calculation. Areas that consider peat soil carbon pools, for example, will result in emission decreases, although these carbon pools are not considered in national ERR estimates. Aside from that, almost all schemes calculate activities based on emission calculations from avoid deforestation and forest degradation activities or avoid deforestation plans, whereas those calculated nationally, activities based on deforestation and degradation, and carbon pools are only calculated by AGB.

By looking at these considerations, it is based on the fact that the various schemes that have been identified have different activities or methodologies used, carbon pools, and types of gas that are calculated to estimate emission reductions. For example, areas that take into account peat soil carbon pools will result in emission reductions, while these carbon pools are not taken into account in national ERR calculations. Apart from that, the activities calculated by almost all schemes apply emission calculations from avoid deforestation and forest degradation activities or avoid deforestation plans, while those calculated nationally, the activities calculated from deforestation and degradation, and carbon pools are calculated only by AGB. Thus, the approach is considered appropriate and quite conservative in considering the potential for double claims regarding emission reduction results in overlapping areas.

#### Documentation provided by the project proponent

The information above will be included to the ERR.



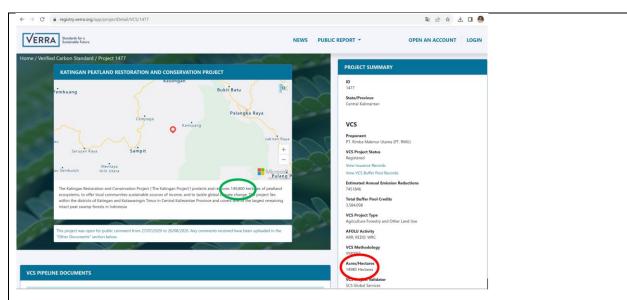


# Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

Carbon Standart/Registry	Project Name	Location	Area ( Ha)	Activity / Methodology	Carbon Pool	Gases	ER Reporting Period	Potential o area 2017/2018	(Ha)
Jurisdictional REDD+ FCPF World Bank/CATS	FCPF Carbon Fund	East Kalimantan	12,746,546	REDD+	AGB, SOC	<i>co</i>			
PCPP World Bank/CATS	PCPP Carbon Fund	East Kalimantan	12,/40,540	REDD+	AGB, 30C	CO2	1 July 2019-31 Aug 2020	0	0
ISFL - World Bank/-	Jambi Sustainable Landscape Management Project (J-SLMP)	Jambi	2,082,286	REDD+ISFL	AGB, BGB, SOC	CO <sub>2</sub>	Not yet reported	0	0
Voluntary Carbon Satndard Gold Standard/Impact	d No Project type under A/R or REDD+								
Registry								0	0
Plan Vivo / Markit Registry	Rimbak Pakai Pengidup Project	West Kalimantan	1,430	ADD	AGB, BGB	CO2	01/01/2018 - 31/12/2018		1,430
	Bujang Raba Community PES Project	Jambi	5,336	ADD, PES	AGB, BGB		01/01/2017 - 31/12/2017		5,336
	Bujang Kaba Community PES Project	Jampi	5,336	AUD, PES	AGB, BGB	CO <sub>2</sub>	01/01/2017 - 31/12/2017 01/01/2018 - 31/12/2018 01/01/2019 - 31/12/2017		5,336
	Durian Rambun	Jambi	3,616	ADD, PES	AGB, BGB	CO2	01/01/2015 - 01/09/2018	3,616	3,616
Verra/VCS	Katingan Peatland Restoration and	Kalimantan Tengah	14,980	ARR; REDD; WRC / VM0007	AGB, Peat SOC	CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> C	01/01/2017 - 31/12/2017	14,980	0
	Conservation Project Rimba Raya Biodiversity Reserve Project	Kalimantan Tengah	64,977	REDD - APD / VM0004	AGB, Peat SOC	CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> C	01/01/2018 - 31/12/2018 23/06/2017 - 31/12/2017 01/01/2018 - 31/12/2018	64,977	64,977
	Sumatra Merang Peatland Project	Sumatera Selatan	22,922	ARR; WRC / VM0007	AGB, Peat SOC	CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> C	01/01/2019 - 30/06/2019 01/01/2017 - 31/12/2017		22,922
	(C1400)								
	(SMPP)						01/01/2018 - 31/12/2018		
TOTAL Avoided Plan Deforestaton Avoided Deforestaton and F				Afforestation, Reforestation, Wetlands Restoration and Ci		1	01/01/2018 - 31/12/2018	113,261	98,281
Avoided Plan Deforestaton			ARR				01/01/2018 - 31/12/2018	113,261	98,281
Avoided Plan Deforestaton	orest Deeradation		ARR				01/01/2018 - 31/12/2018 Date: 23/1		
Avoided Plan Deforestaton Avoided Deforestaton and F B's evaluat Cypo regar rected. Ind nber is 149,	tion ding Katingan onesia team rep ,800 ha, ten time	ported t es larger.	ARR WRC	toration a he area (h	nd Cor a) is 14	1serv 4,980	Date: 23/1 ation Proj D ha. Howe	. <b>1/20</b> ect r	23 needs
Avoided Plan Deforestaton Avoided Deforestaton and F B's evaluat Cypo regar rected. Ind nber is 149, e spreadshe	tion ding Katingan onesia team rep ,800 ha, ten time eets and the ERR	ported t es larger.	ARR WRC	toration a he area (h	nd Cor a) is 14	1serv 4,980	Date: 23/1 ation Proj D ha. Howe	. <b>1/20</b> ect r	23 needs
Avoided Plan Deforestaton Avoided Deforestaton and F B's evaluat Cypo regar rected. Ind nber is 149,	tion ding Katingan onesia team rep ,800 ha, ten time eets and the ERR	ported t es larger.	ARR WRC	toration a he area (h	nd Cor a) is 14	1serv 4,980	Date: 23/1 ation Proj D ha. Howe	. <b>1/20</b> ect r	23 needs
Avoided Plan Deforestaton Avoided Deforestaton and F B's evaluat Cypo regar rected. Ind nber is 149, e spreadshe is, CL10 is r	tion ding Katingan onesia team rep ,800 ha, ten time eets and the ERR	ported t es larger.	ARR WRC	toration a he area (h	nd Cor a) is 14	nserv 4,980 - this	Date: 23/1 ation Proj D ha. Howe	.1/20 ect r ever,	23 needs the



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We should have taken the data at the bottom of the map (green mark) but we took the data in the project summary (red mark).

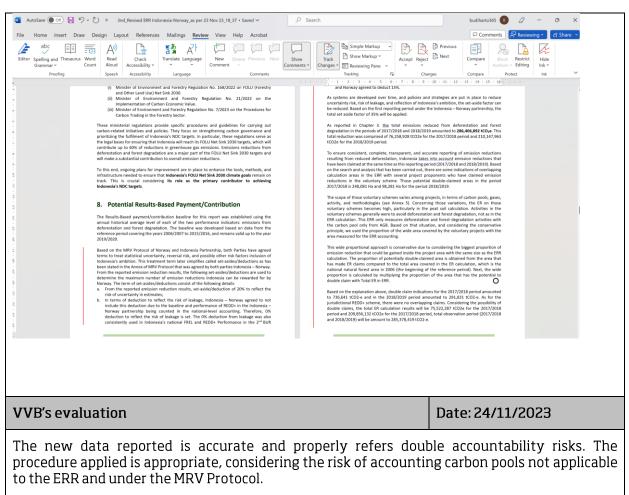
We have corrected it in the Katingan Peatland Restoration Project area in the spreadsheet and updated the calculation figures affected by the typo.

#### Documentation provided by the project proponent

			-	No Carbor	n Standart/Registry	Project	Name	Location	Area ( Ha)	Activity / Method	ology Carb	on Pool	Gases	ER Reporting Period	are	l of double a (Ha) I 2018/2019	
			_		ional REDD+												
				1 FCPF We	orld Bank/CATS	FCPF Carbon Fund		East Kalimantan	12,746,546	REDD+	AGB, S	oc	CO2	1 July 2019-31 Aug 2020	0	0 0	
				2 ISFL - W	orld Bank/-	Jambi Sustainable Lar Management Project		Jambi	2,082,286	REDD+ISFL	AGB, B	GB, SOC	CO2	Not yet reported		0 0	
			-	B Volunta	ry Carbon Satndard	in a nage in circle i reject	() Schilly										
			-	1 Gold Sta Registry	andard/Impact	No Project type unde	r A/R or REDD+								(	0 0	
			-		o / Markit Registry	Rimbak Pakai Pengidu	ip Project	West Kalimantan	1,430	ADD	AGB, B	GB	CO2	01/01/2018 - 31/12/2018	1,430	1,430	
														01/01/2019 - 31/08/2020			
						Bujang Raba Commun	nity PES Project	Jambi	5,336	ADD, PES	AGB, B	GB	CO <sub>2</sub>	01/01/2017 - 31/12/2017	5,336	i 5,336	
														01/01/2018 - 31/12/2018 01/01/2019 - 31/12/2017			
						Durian Rambun		Jambi	3,616	ADD, PES	AGB, B	GB	coz	01/01/2015 - 01/09/2018	3,616	i 3,616	
			-	3	Verra/VCS	Katingan Peatland Re Conservation Project	storation and	Kalimantan Tengah	149,800 A	RR; REDD; WRC / V	M0007 AGB, F	Peat SOC CO;	2, CH4, N2O	01/01/2017 - 31/12/2017	149,800	0 0	
						Rimba Raya Biodivers	ity Reserve Project	Kalimantan Tengah	64,977	REDD - APD / VM	0004 AGB, F	Peat SOC CO;	2, CH4, N2O	01/01/2018 - 31/12/2018 23/06/2017 - 31/12/2017	64,977	64,977	
														01/01/2018 - 31/12/2018 01/01/2019 - 30/06/2019			
						Sumatra Merang Peat	tland Project (SMPP)	Sumatera Selatan	22,922	ARR; WRC / VM0	007 AGB, F	Peat SOC CO;	, CH4, N20	01/01/2017 - 31/12/2017	22,921	22,922	
			-		TOTAL				248,081					01/01/2018 - 31/12/2018	248,081	98,281	
					TOTAL				240,001						240,001	50,202	
														Risk Ana	lysis of	Double C	laim
												_				2017/2018	248,081
esult Period	RBP/C Baseli	ne (tCO2)	Actual Em	issions (tCO2	) Res	ult (tCO2)	Total (tCO2e)	Risk of Double Claim (tCO2e)	Clean of Doub claim (tCO2e		Potential of RBP/C			Area Overlap (Ha)		2018/2019	98,281
	Deforestation	Degradation	Deforestatio	n Degradat	ion Deforestatio	Degradation		ciaim (tcoze)	daim (tCO2e	(tcoze)	(tCO2e)			Area ERR (All Natura	il Forest 20	006)	96,454,143
2017/2018	236,946,787		140,859,9	13 60,802,6							49,089,48	7		Emission Reduction		2017/2018	76,258,928
2018/2019	236,946,787				743 176,494,02					32 73,449,646	136,406,48					2018/2019	210,147,963
Total	473,893,574	81,949,359	201,312,6	73 68,123,	369 272,580,90	13,825,991	286,406,892	1,028,473	285,378,4	19 99,882,447	185,495,97	2		Total E		2017/2018	286,406,892
	RBP/C Baselin	e (MtCO2)	Actual Emis	sions (MtCO	2) Resu	It (MICO2)				, Set Aside	Potential of	:	Pe	ercentage of overlap by	area	2018/2019	0.109
esult Period	Deforestation				ion Deforestatio		Total (MtCO2e)	Risk of Double Claim (MtCO2e)		1e 35.90	RBP/C (MtCO2e)		Pot	ential of Doble Claim (I	(COZe)	2017/2018	736,641
2017/2018	236.95	40.97	140.0	36 60	.80 95.0	-19.83	76.26	0.74	75.	52 26.43	49.0	19				2018/2019	291,831
2018/2019	236.95	40.97	60.	15 7	.32 176.4	33.65	210.15	0.29	209.	86 73.45	136.4	1	т	otal ER minus Double C	laim	2017/2018	75,522,287
Total	473.89	81.95	201.	31 68	.12 272.5	13.83	286.41	1.03	285.	38 99.88	185.5	0			agaan i	2018/2019	209,856,132
														Total			285,378,419



# Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation



Thus, CL10 is closed.



Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

#### Annex 7: Emission estimates differences between versions of the Emission Reduction Report for the Indonesia-Norway Partnership

As a consequence of the verification process, the emissions estimates have changed from the first version of the ERR (ERR Indonesia-Norway\_Final\_31July2023.pdf), delivered to the audit team in mid-August 2023, to the last verified version (4th\_Revised ERR Indonesia-Norway\_as per 23 Nov 23\_19\_24\_Clean.docx), delivered to the audit team the 23<sup>rd</sup> of November 2023. Those changes were caused by clarification number 10 (CL10):

1. For the calculation of both ER from reduced deforestation and forest degradation, Indonesia did not disclose the possible risk of double claiming by other voluntary and/or jurisdictional projects for the two ERR monitoring periods, 2017/2018 and 2018/2019.

The response to this CL10 had a minor impact on the estimation of emission from deforestation. However, the estimates of emissions from forest degradation varied due to the changes. The following table summarises the changes of the estimates between the first and the last version of the *Emission Reduction Report*:

	Version 16 <sup>th</sup> of August 2023 2017/2018	Version 23 <sup>rd</sup> November 2023 2017/2018	Version 16 <sup>th</sup> of August 2023 2018/2019	Version 23 <sup>rd</sup> November 2023 2018/2019	TOTAL v.16 <sup>th</sup> of August 2023, 2017/2018 & 2018/2019	TOTAL v.23 <sup>rd</sup> November 2023, 2017/2018 & 2018/2019		
Deforestation & Forest Degradation (tCO <sub>2</sub> e)	76.258.928	75.522.287	210.147.963	209.856.132	286.406.892	285.378.419		
Total Difference between initial and final version results (tCO <sub>2</sub> e)	- 736	5.641	- 291	.831	-1.028.473			
% Variation between the initial and the final version results	0,9	16%	0.1	3%	0.3	5%		

### Annex 8: Comments on the draft of the Verification Report

N°	MoEF Indonesia comments (30/11/2023)	AENOR response (30/11/2023)	MoEF Indonesia comments (30/11/2023)
	The Entire Doc	ument Generally	
1	In the entire document, we found that there is specifically written number behind the document's name and/or others in e.g as highlighted below:	Annex 3 of this verification report refers to the list of evidence provided, from 1 to 23.	Thank you and accepted for the clarification
	On Para 1 chapter 1.1: "In verifying the results available, the process of verification has considered the content of Indonesia's results report based on all elements of MRV Protocol /2/ and its Annex /3/, referring to the MoU and Contribution Agreement. AENOR's audit team has ensured that the agreed use of methods, processes, and consistencies as established by the MRV Protocol /2/ are the guiding criteria for the verification. The verification ensures that the reported results are based on consistent use of appropriate methodologies in line with the MRV Protocol /2/" Please do clarify the numbers' meaning, is it a mark for a footnote?	It is business as usual to quote the numbers that refer to a specific type of evidence. For instance, when you see MRV Protocol /2/, you can go to annex 3 and see the name of the document we have used on item number 2. No updates will be made regarding this suggestion.	
2	To ensure consistency with the ERR document, the RBP terminology should be written as Result Based Payment/Contribution (RBP/C). As a result, all the abbreviations of RBP need to be replaced with RBP/C.	Corrected alongside the verification report.	Correction accepted.
3	we found some terminologies "avoided" deforestation and degradation i.e as stated below: AENOR reproduced and verified 100% of the calculations in the calculation spreadsheet <i>Spreadsheet_REDD Norway_2006- 2019_Final_Update Risk of Double Claim_as per 23 Nov 23_18_37 /8/</i> (from now on, "REDD calculation spreadsheet") for the estimation of emissions from deforestation and forest degradation for the period 2006/2007-2015/2016 and emissions	Corrected alongside the verification report.	Correction accepted.

N°	MoEF Indonesia comments (30/11/2023)	AENOR response (30/11/2023)	MoEF Indonesia comments (30/11/2023)
	reductions from <b>avoided</b> deforestation and forest degradation for the monitoring periods 2017/2018 and 2018/2019.		
	All terminology of "avoided" should be replaced by "reduced"		
Specific	items in the document		
1	In Chapter 1.1, Para 4 stated as below: "The three monitoring periods (2017/2018 and 2018/2019 periods during this verification process) were assessed in comparison to the following results-based payment (RBP/C) baseline, as reported in the document 4th_Revised ERR Indonesia-Norway_as per 23 Nov 23_19_24_Clean /1/ (from now on, "ERR"):": Regarding the monitoring periods (as highlighted above), the three monitoring periods should be : 2016/2017, 2017/2018, and 2018/2019.	As was directly identified by the audit team, there are three monitoring periods, but only two of them are within the scope of the audit process. The audit team decided to disclose this information for clarifying purposes, but the sentence is correct, as the audit team is only assessing 2017/2018 and 2018/2019. "The three monitoring periods (2017/2018 and 2018/2019 periods during this verification process), were assessed in ()" is maintained and no further updates are required.	Thank you and accepted the explanation.
2	Chapter 1.2. The Scope on the first bullet is stated as below: Emissions from gross deforestation at the national level 2006/2007- 2015/2016 for the 2017/2018 and 2018/2019 monitoring periods We proposed the suggested sentence: Emissions from gross deforestation at the national level 2006/2007- 2015/2016 used as RBP/C baseline for the 2017/2018 and 2018/2019 monitoring periods	Suggestion accepted.	Correction accepted.
3	Chapter 1.2. The Scope on the second bullet is stated as below: Emissions from gross forest degradation at the national level 2006/2007-2015/2016 for the	Suggestion accepted.	Correction accepted.

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N°	MoEF Indonesia comments (30/11/2023)	AENOR response (30/11/2023)	MoEF Indonesia comments (30/11/2023)
	2017/2018 and 2018/2019 monitoring periods		
	We proposed the suggested sentence: Emissions from gross forest degradation at the national level 2006/2007-2015/2016 used as RBP/C baseline for the 2017/2018 and 2018/2019 monitoring periods		
4	Part of 2.2. Method and Considerations and 2.4. In- country visit, The duration of the audit is written as below: An in-country visit was conducted	Suggestion accepted.	Correction accepted.
	between October the 4 <sup>th</sup> and 6 <sup>th</sup> , 2023 We proposed the suggested sentence: An in-country visit was conducted from October the 4 <sup>th</sup> to 6 <sup>th</sup> , 2023.		
5	Chapter 2.3. Document Review The reviewed documentation is written in the 8 <sup>th</sup> bullet as stated below:	Suggestion accepted; it was a typo.	Correction accepted.
	Land cover maps: 1990, 1996, 2000, 2003, 2006, 2009, 2011, 2012, 2013, 2015, 2016 and 2017.		
	This statement needs to be added land cover maps of 2018 and 2019.		
6	Chapter 2.3 Document Review	Suggestion accepted.	Correction accepted.
	The reviewed documentation is written in the 11 <sup>th</sup> bullet as stated below:		
	Uncertainty calculation spreadsheet Uncertainty Calculation_Norway_II_20230725 /10/.		
	This spreadsheet is integrated to Spreadsheet_REDD Norway_2006- 2019_Final_Update Risk of Double		

N٥	MoEF Indonesia comments (30/11/2023)	AENOR response (30/11/2023)	MoEF Indonesia comments (30/11/2023)
	Claim_as per 23 Nov 23_18_37		
7	Chapter 3.5.2 Emission Factors Moreover, within this same Section, Tables 2 and 3 refer to the deforestation and forest degradation emission factors by forest classes and regions, respectively. As such, Table 2 reports information about the different six forest classes, in accordance with the FREL, for seven (7) different regions: Jawa, Kalimantan, Maluku, Bali-Nusa Tenggara, Papua, Sulawesi and Sumatera. The same principle applies for Table 3, but only for the three primary forest classes: Primary Dryland Forest, Mangrove Forest and Swamp Forest, as there is no forest degradation identified in Secondary Dryland Forest, Mangrove Forest and Swamp Forest. Suggestion: Primary Dryland Forest, Primary Mangrove Forest and Primary Swamp Forest, as there is no forest degradation identified in Secondary Dryland Forest, Secondary Mangrove Forest and Secondary Mangrove Forest and Secondary Swamp Forest.	Suggestion accepted.	Correction accepted.
8	Chapter 3.5.2 Emission Factors, in the last paragraph is written as below: The audit team has accessed the National Forest Inventory and crosschecked the information with reported data from the first Indonesian FREL. The information has been consistent with the reported data from the third BUR. The audit team has assessed the rational on the use of Chavel et al, 2005 for quantifying aboveground biomass (AGB).	Suggestion accepted; it was a typo.	Correction accepted.

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Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation

N°	MoEF Indonesia comments (30/11/2023)	AENOR response (30/11/2023)	MoEF Indonesia comments (30/11/2023)
	Chavel needs to be replaced with Chave.		
9	<ul> <li>3.10.1. Uncertainty analysis</li> <li>AENOR's audit team has reviewed relevant evidence regarding the QA/QC procedures applied by the PP, as can be seen within Section 3.9 of this verification report.</li> <li>Please replace "the PP" with "Indonesia"</li> </ul>	Suggestion accepted.	Correction accepted.
10	<ul> <li>3.13. Result-Based Payment/Contribution, Para 5 is written below:</li> <li>After applying double claiming deductions (see Section 3.11 above), double claim indications for the 2017/2018 period amounted to 736,641 tCO2-e and in the 2018/2019 period amounted to 291,831 tCO2-e. The total ER calculation results will be 75,522,287 tCO2e for the 2017/2018 period and 209,856,132 tCO2e for the 2017/2018 period, total observation period (2017/2018 and 2018/2019) will be amount to 285,378,419 tCO2- e.</li> <li>The highlighted word needs to be replaced by 2018/2019.</li> </ul>	Suggestion accepted; it was a typo.	Correction accepted.

No comments have been provided by The Royal Norwegian Ministry of Climate and Environment.