



Validation and Verification Report

ACR925 Finite Carbon– Batchawana Bay Forest IFM

Astina Forest AG &
Finite Carbon, LLC

October 2, 2025

TÜV SÜD America Inc.

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1 INTRODUCTION

Finite Carbon, LLC (Finite) contracted with TÜV SÜD America Inc. (TÜV SÜD), to perform the validation and verification of ACR925 Finite Carbon – Batchawana Bay Forest IFM Project (Project) for the reporting period of May 15, 2023 - December 31, 2023 and a crediting period of May 15, 2023 – May 14, 2043 under the ACR program. Finite acts as the project developer for the landowner and project proponent Astina Forest AG (Astina). This report is documentation of validation and verification activities performed by TÜV SÜD for the Project. For the validation, TÜV SÜD reviewed the project information as described in the GHG Project Plan and its appendices. For the verification, TÜV SÜD ensured that the GHG statement was materially correct, that the data provided to TÜV SÜD was well documented, and that if Finite made any material errors, that these errors were corrected.

1.1 OBJECTIVES

The objectives of the validation are to evaluate:

- Conformance to the ACR standard and the approved ACR Methodology for Improved Forest Management on Canadian Forestlands (Methodology).
- GHG emissions reduction project planning information and documentation in accordance with the applicable ACR-approved methodology, including the project description, physical infrastructure, activities, technologies, and processes of the Project, baseline, eligibility criteria, monitoring and reporting procedures, process information, source identification/counts, operational details, and quality assurance/quality control (QA/QC) procedures.
- Reported GHG baseline, ex ante estimated project emissions and emissions reductions/removal enhancements, leakage assessment, and impermanence risk assessment and mitigation (if applicable).

The objectives of the verification are to evaluate:

- The emissions reductions and to ensure that the statement is materially correct.
- The data provided to TÜV SÜD can be documented and if errors or omissions are detected, they be corrected.

TÜV SÜD retains all data and documents for seven years after the end of the project reporting period or for the duration required by ACR, whichever is longer.

1.2 PROJECT BACKGROUND

The Project is located on approximately 21,567 hectares in Ontario, Canada. This property is owned by Astina Forest AG. The Project ensures long-term sustainable management of the forests.

1.3 RESPONSIBLE PARTY

Project Proponent

Astina Forest AG
6062 Hwy 17
Goulais River, ON P0S 1E0 Canada
Pat Rosebrook

Project Developer

Finite Carbon, LLC
435 Devon Park Drive, 700 Building
Wayne, PA 19807
Jemina Coutu

1.4 VALIDATION AND VERIFICATION TEAM

Lead Validator and Verifier: Christian Eggleton

Team Members: Tim Facemire, Thomas Christopher, Vitor Aguiar, Benjamin Miller

Independent Reviewer: Zach Eyler

1.5 VALIDATION AND VERIFICATION CRITERIA

1.5.1 Validation and Verification Standards, Guidelines, and Tools

- ACR Standard, Version 8.0 (July, 2023)
- ACR Validation and Verification Standard Version 1.1 (May, 2018)
- Improved Forest Management on Canadian Forestlands v.1.0, September 2021
- Improved Forest Management on Canadian Forestlands, Errata & Clarifications, January 1, 2024
- ACR Tool for Risk Analysis and Buffer Determination, v1.0
- ISO 14064-3:2019 “Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas statements”
 - ACR925 Batchawana Bay_GHG Project Plan_v1.3_20250926_Signed.pdf
 - Verification only

1.5.2 Level of Assurance

The verification was conducted to a reasonable level of assurance.

1.5.3 Materiality

The verification was conducted to ACR’s required materiality threshold of +/-5% of the GHG project’s emissions reductions or removal enhancements.

2 VALIDATION AND VERIFICATION PROCESS

As the first step in validation/verification activities, the Lead Validator/Verifier developed a Validation/Verification Plan to be followed throughout the validation and verification. The plan included the following activities:

- TÜV SÜD completed a COI form for the validation and for verification on May 20, 2024 to identify any potential conflict of interest with the Project or Project Developer. The COI form was approved by ACR on May 22, 2024.
- TÜV SÜD and Finite held a validation and verification kick-off meeting on May 31, 2024. During the kick-off meeting TÜV SÜD reviewed the validation and verification objectives and process, reviewed the schedule, and submitted an initial document request.
- TÜV SÜD performed a strategic analysis and risk assessment of the received data and support documents to understand the scope and areas of potential risk in the GHG emissions reductions.
- TÜV SÜD developed a validation/verification plan and risk-based evidence gathering plan based upon the strategic analysis and risk assessment. The validation/verification plan and evidence gathering plan were used throughout the process and were revised as needed based upon additional risk assessments.
- The validation/verification team conducted the site visit to the Project to verify the inventory quality and forest management practices from June 10-14, 2024. During the site visit the Verification Team performed key personnel interviews, conducted 90% t-test of inventory plots, conducted reconnaissance of the Project area boundary, observed elements of natural forest management, and observed harvest locations (if applicable) during and preceding the reporting period.
 - The site visit was attended by the following verification team personnel:
 - TÜV SÜD:
 - Thomas Christopher
 - Tim Facemire
 - During the site visit, the Verification team met with the following individuals:
 - Finite
 - Brian Sharer
 - Jacob Handel
 - Matt Smith
 - Jemina Coutu
 - Blackbird (Manager of Project)
 - Pat Rosebrook
 - Clyde Bridge
- TÜV SÜD performed a risk-based desktop review of the submitted validation/verification documents. The desktop review included an assessment of the GHG calculation methods and inputs, source data completeness, data management system and monitoring systems and eligibility documentation.
- TÜV SÜD conducted interviews and had conversations with Project personnel during the verification. Personnel interviewed include:
 - Jemina Coutu – Finite

- Brian Sharer – Finite
- TÜV SÜD submitted requests for corrective actions, non-material findings, additional documentation, and clarifications as necessary to Finite throughout the validation/verification.
- TÜV SÜD’s independent reviewer conducted a review of the validation/verification evidence gathering plan, validation/verification report, and verification opinion.
- TÜV SÜD issued a final validation/verification report, verification opinion, and List of Findings.
- TÜV SÜD held an exit meeting with Finite.

3 VALIDATION AND VERIFICATION FINDINGS

3.1 PROJECT BOUNDARY AND ACTIVITIES

The Project entails improved forest management on approximately 21,567 hectares in Ontario, Canada. GHG emission reductions for the Project are quantified by comparing actual onsite carbon stocks against modeled baseline onsite carbon stocks and baseline carbon in harvested wood products. The difference in these Project and baseline carbon stocks year over year is the basis for calculating the Project’s primary goal of maintaining and enhancing forest GHG pools.

The Project’s temporal boundary is the crediting period from May 15, 2023 – May 14, 2043.

3.2 GHG SOURCES SINKS, AND RESERVOIRS

Table 1 shows the GHG emission sources included in the project boundary based on the Methodology. RCE confirmed that the GHG Project Plan appropriately identifies the offset project boundary and includes all relevant SSRs.

Table 1. GHG Emissions Sources

Source	GHG	Description
Above-ground biomass	CO ₂	Major carbon pool for project activity
Below-ground biomass	CO ₂	Major carbon pool for project activity
Harvest wood products	CO ₂	Major carbon pool for project activity
Market Effects	CO ₂	Reductions in project outputs due to project activity may be compensated by other entities in the marketplace. Those emissions must be included in the quantification of project benefits.

3.3 ELIGIBILITY

3.3.1 ACR Eligibility

TÜV SÜD confirmed the following ACR eligibility criteria listed in the ACR Standard, Version 8.0 by reviewing the project proponent’s GHG Project Plan, Monitoring Report, and calculations as well as other supporting documentation described throughout this report (a full list of documents reviewed is in Appendix A).

- Start Date: The project start date is May 15, 2023.

- Minimum Project Term: The minimum project term is 40 years.
- Crediting Period: The crediting period is 20 years as specified by the Methodology, from May 15, 2023 – May 14, 2043.
- Real: TÜV SÜD confirmed that the GHG reductions follow the ACR methodology and are verifiable.
- Emission or Removal Origin: TÜV SÜD confirmed that Astina Forest AG owns and has control over or documented effective control over the GHG sources/sinks from which the emissions reductions or removals originate.
- Offset Title: TÜV SÜD confirmed that all Project lands are owned directly by the Project Proponent (Astina), which holds full legal title.
- Additional: TÜV SÜD confirmed that the project is additional as described in Section 3.4.
- Regulatory Compliance: TÜV SÜD confirmed that the Project was in compliance with all applicable regulations.
- Permanent: TÜV SÜD confirmed that the Project correctly applied the ACR Tool for Risk Analysis and Buffer Determination to account for permanence. A total risk score of 18% was confirmed.
- Net of Leakage: TÜV SÜD confirmed that the Project correctly accounted for leakage per the Methodology.
- Independently Validated and Verified: TÜV SÜD is a third-party validation and verification body that the project proponent has contracted to validate and verify the Project.
- Environmental and Community Assessments: TÜV SÜD reviewed project impacts as described in section 3.6 of this report.

3.3.2 Methodology Eligibility

TÜV SÜD reviewed the Project against the ACR Methodology eligibility and applicability conditions and confirmed the following:

- The Project is located on private, non-crown forestland.
- Astina controls the timber rights on the forestland and can legally harvest.
- The Project property was not harvested in the first reporting period.
- The Project does not use non-native species where adequately stocked native stands were converted for forestry or other land uses after 1997.
- The Project has not drained or flooded wetlands on or after the project start date.
- Astina owns all land and timber rights on the Project area.
- The Project's stocking levels will increase well above the baseline conditions for the duration of the Project and by the end of the Crediting Period.

3.4 ADDITIONALITY

The Project meets the requirements for the demonstration of additionality specified by the ACR Standard and the Methodology.

3.4.1 Regulatory Surplus Test

TÜV SÜD confirmed that there are no existing laws, regulations, statutes, legal rulings, or other regulatory frameworks in effect as of the start date that requires the Project activity and the associated GHG emissions reductions; thus, the Project passes the regulatory surplus test.

3.4.2 Common Practice Test

The Project area is similar to surrounding private forestland that is regularly harvested as it reaches viable diameter thresholds and has a history of some timber harvesting.

The project's geographic region for timber production extends in all directions. Throughout this private forestland is regularly cut, often through shelterwood, heavy and light thins and clear-cutting, and is managed to maximize NPV of the asset. Wood products including sawtimber and pulpwood are distributed to mills throughout this region and demand is strong and steady.

3.4.3 Implementation Barriers Test

The Project chose to assess the financial barriers test per the ACR Standard and Methodology. TÜV SÜD confirmed that carbon funding is reasonably expected to incentivize the Project's implementation. Due to the Project being implemented, Astina loses the ability to monetize timber harvests at a rate similar to business-as-usual practices during the life of the Project. The Proponent provided a financial assessment comparison of NPV between the baseline scenario with harvesting and the project scenario including revenue from carbon credits. The baseline scenario NPV was significantly greater demonstrating that carbon funding is integral to the project activity.

3.5 PERMANENCE

TÜV SÜD confirmed that the Project correctly applied the ACR Tool for Risk Analysis and Buffer Determination to account for permanence. A total risk score of 18% was confirmed.

3.6 ENVIRONMENTAL AND COMMUNITY IMPACTS

The GHG Project Plan includes a summary of the Project activity's net positive environmental and community impacts and sustainable development goals, that can be found in ACR925-ESI-Assessment-Report-v2.0-20250827.pdf and ACR925-SDG-Cont-Report-AFOLU-Project-v3.0_20250828.pdf. The Project will provide habitat protection for wildlife, plant species, and trees, water quality protection and protection from soil erosion and degradation among other benefits. The Project is not expected to cause any negative environmental impacts. Sustainable Development Goals listed are 6, 13, 15 and 3.

3.7 LOCAL STAKEHOLDER CONSULTATION

As a private landowner, the Proponent was not required to disseminate information to local stakeholders or gathering comments on the project.

3.8 MONITORING PLAN

The GHG Project Plan includes a Monitoring Plan that identifies all monitored data and parameters. TÜV SÜD confirmed that the monitoring parameters and approaches conform to the methods required by the

Methodology. The plan includes all relevant data parameters and appropriately identifies units of measurements, data sources, methodologies, uncertainty, monitoring frequency and procedures, and QA/QC procedures. After discussions with the Proponent and developer and reviews of project documents, TÜV SÜD determined that the Monitoring Plan accurately reflects how Project data is monitored and recorded and there are no deviations relevant to the Project activity against the requirements of the Methodology. The Proponent implemented the monitoring plan as stated in the GHG Project Plan during Project activities.

3.9 BASELINE SCENARIO

The Project's baseline scenario represents a moderately intense harvest regime, targeted to maximize net present value at a 6% discount rate as a private industrial landowner. The baseline scenario applies harvesting across the Project area as allowed by the Methodology to maximize NPV.

The Project's baseline model simulates a range of harvest types and rotation lengths based on legal requirements and simulated growth within each stratum. The objective of modeling was to determine possible timber harvests in the project area over 100 years within the framework of legal and reasonable harvest constraints.

Stands were modeled for different prescriptions, including no-harvest, shelterwood harvest, heavy and light thin, and clearcut, with restrictions on diameter class and retention.

The Proponent utilized the USDA's Forest Vegetation Simulator (FVS) Ontario variant to model harvests and yields. Growth models were calibrated using site index values calculated from tree core analysis within the project area. TÜV SÜD reviewed the Site Index calculations and confirmed that a reasonable species and site index for the region was assigned on an individual plot basis to appropriately calibrate growth. The process was confirmed to be consistently and systematically applied to each plot.

TÜV SÜD reviewed the resulting baseline outputs to ensure that they reflected the modeling objectives and the legal additionality requirements. The model grows trees and volumes at a reasonable rate compared to regional averages.

3.10 ON-SITE INVENTORY VERIFICATION CHECK

In preparation for and during the site visits, the Verification Team reviewed evidence necessary to verify Project inventory estimates.

The Project inventory consists of three forested strata which TÜV SÜD sampled using a random sampling method.

The current inventory contains 212 permanent, fixed-radius plots. At each plot location, trees were measured in two nested plots: a larger 1/33.35th hectare plot with radius of 9.77 meters, and a smaller 1/400.27th hectare plot with radius of 2.82 meters. The larger plot measured all living and standing dead trees greater than or equal to 12.7 centimeter DBH while the smaller, nested plot measured all living trees between 2-12.7 centimeters. Additionally, standing dead trees had to meet or exceed a height of 1.3 meters.

Given this sample design and Project size, the Verification Team was required to achieve a minimum of 15 successful plots within the project to successfully verify inventory stocking levels. The Verification Team successfully verified site data after measuring a total of 15 site plots. The Project passed the t-test during the site visit.

Project Area

During the site visit, the Verification Team conducted boundary-line reconnaissance by visiting Project boundary edge lines and points, plotting edge points with GPS receivers, and determining whether there were discrepancies with the digital Project boundary files provided by the Proponent and the physical boundary witnessed on site. This was done to determine the risk that Project area inaccuracies could contribute to a material misstatement in Project emission reductions. To the extent feasible, the Verification Team confirmed that the Project area boundary and timber sale boundaries were appropriate and accurate.

3.11 PROJECT DATA AND GHG EMISSIONS REDUCTION STATEMENT

TÜV SÜD reviewed the GHG Project Plan and Project data and calculations to ensure that appropriate equations were used in calculating baseline emissions, project emissions, and net emissions reductions.

3.11.1 Baseline Emissions

TÜV SÜD confirmed that the baseline emissions were correctly calculated. Baseline emissions were calculated by reviewing input and output files for every FVS baseline modeling prescription, including forest codes, diameter breaks, merchantability thresholds, rotation lengths, regen/spouting, FVS harvest triggers on individual plots, site indices, treelists, and plotlists modeled over 100 years. The output workbook (ACR925 Batchawana Bay_GHGPP_Calculations_v4.1_20250620_FINAL.xls) was then independently recreated in the data checks confirming proper calculation of assigned plot level outputs allocated to prescription based independently confirmed SMZ constrained and unconstrained acres. These values were then compiled into yearly baseline values for live and dead as reflected in the ERT monitoring calculation sheet. A secondary output of this process was the 100 years of modeled harvesting based off Best Management Practices (BMP) constrained acreages which was then run through the prescribed harvested wood product calculations customized for the project region(s). These calculations were made on 20-year time intervals as well as 100-year intervals and they were appropriately incorporated into the ERT monitoring calc sheet. See additional information relevant information in section 3.9.

3.11.2 Project Emissions

TÜV SÜD confirmed that the project emissions were correctly calculated. The methods to confirm project emissions follow what is described in section 3.11.1 above.

3.11.3 Emissions Reductions

TÜV SÜD verified that the Proponent calculated emission reductions according to relevant Methodology equations and that the methods are included in the GHG Project Plan.

TÜV SÜD recalculated emission reductions for the first reporting period according to the equations defined in the Methodology and the GHG Project Plan and found the Project statement to be free of material misstatement.

TÜV SÜD also recalculated and confirmed the uncertainty assessment for the Project. The uncertainty calculation is the compiled square roots of the summed errors of the strata using a 90% confidence interval. TÜV SÜD confirmed that the live, dead, and total uncertainty for the reporting period onsite carbon stocks was accurate.

3.11.4 Leakage Assessment

TÜV SÜD recalculated and confirmed the leakage for the project in accordance with the ACR Validation and Verification Standard version 1.1 section 6.F and 9.H.

4 VALIDATION AND VERIFICATION RESULTS

TÜV SÜD developed a combined List of Findings for both the validation and verification. The List of Findings noted all corrective action requests (CARs), non-material findings (NMs), additional documentation requests (ADRs), and clarification requests (CRs), as necessary. The Proponent appropriately responded to all items in the List of Findings. The List of Findings is provided as Appendix B.

5 VALIDATION AND VERIFICATION CONCLUSION

TÜV SÜD conducted a risk-based analysis of the ACR925 Finite – Batchawana Bay Forest IFM Project GHG statement including a strategic review of the Project data and evidence. Preparation and fair presentation of the GHG statement in accordance with the criteria is the responsibility of Astina:

- GHG-related activity: improved forest management of forest land on the Project area
- GHG statement: May 15, 2023 – December 31, 2023
- Criteria:
 - ACR Standard, Version 8.0 (July, 2023) (validation and verification)
 - ACR Validation and Verification Standard Version 1.1 (May 31, 2018)
 - Improved Forest Management on Canadian Forestlands v.1.0, September 2021
 - Improved Forest Management on Canadian Forestlands, Errata & Clarifications, January 1, 2024
 - ACR Tool for Risk Analysis and Buffer Determination, v1.0
 - ISO 14064-3:2019 “Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas statements”
 - ACR925 Batchawana Bay_GHG Project Plan_v1.3_20250926_Signed.pdf
 - Verification only

The data and information supporting the GHG statement were historical in nature.

TÜV SÜD has ensured the Proponent’s effective use of controls related to the GHG statement. TÜV SÜD concludes that there is sufficient and appropriate evidence to support the Proponent’s GHG statement and is issuing a Positive Opinion.

TÜV SÜD confirms that the GHG statement has been prepared:

- Without material discrepancy,
- In accordance with all applicable criteria, and
- Verified to a reasonable level of assurance.

The verified emission reductions are listed in Table 2. While TÜV SÜD confirmed the emission reduction calculations and the total emission reductions to be correct and within the materiality threshold, the values in Table 2 are summary data only with significant figures rounded for summary purposes in this report.

Table 2. Total ERTs

SECTION VI: GHG STATEMENT (APPLICABLE FOR VERIFICATION OPINIONS)					
Omit or provide additional rows for Vintages as needed					
ALL GHG PROJECTS		AFOLU & GEOLOGIC SEQUESTRATION PROJECTS ONLY			
Vintage	Total ERRs	Removals Subset of Total ERRs (if applicable)	Emission Reductions Subset of Total ERRs (if applicable)	Buffer Pool / Reserve Account Contribution (if applicable)	Net ERRs (if applicable)
2023	339,461	109,459	230,002	61,103	278,358
TOTALS*	339,461	109,459	230,002	61,103	278,358
*Totals may not sum due to rounding					


Note: Totals might not sum due to rounding.

Lead Validator and Verifier



Christian Eggleton

Independent Reviewer



Zach Eyler

APPENDIX A—DOCUMENTS REVIEWED

Number	Name
1	ACR925 Tree-level AG and Plot-level BG Recalculation series
2	Li et al., 2003
3	Astina 2024 Property Ownership Tax Documentation
4	Appendix_B_InventorySpecifications
5	Tree Core Photos (108)
6	BatchwanaBay_rawdata
7	Astina_Plots shapefile
8	Astina_ProjectArea shapefile
9	ACR925 RP1 Carbon Calculations v 1.0 series
10	Figure A-1. Vicinity Map with Latitude and Longitude
11	Figure A-2. Regional Hydrology Map
12	Figure A-3. Canopy Cover Map
13	Figure A-4. Topography Map
14	Figure A-5. Roads Map
15	Figure A-6. Ownership Map
16	Wildfire Hazard Potential Map
17	Batchawana_Bay_MillCapacityAnalysis series
18	ACR925 GHG Project Plan_series
19	ACR925 GHGPP Calculations v2.0_series
20	ACR925 RP1 Monitoring Report_1.1_series
21	Astina_Master_PlotGrid shapefile
22	Astina_ProjectArea_Strata_SMZ shapefile
23	ACR925 Batchawana Bay Baseline Harvest Schedule Calculation v1.0_series
24	ACR925 Batchawana Bay Baseline Regeneration Workup v1.0_series
25	ACR925 Batchawana Bay FVS Keyword v 1.0_series
26	ACR925 Batchawana Bay Site Index Workup v1.0_series
27	ACR925 RP1 Carbon Calculations v 1.0 series
28	ACR925_Batchawana_Bay Modeling
29	FVS .out files (4)
30	ACR925 Batchawana Bay FVS Input DB v1.0 series
31	ACR925 Batchawana Bay FVS Output DB v1.0 series
32	Chapeskie, David John, et al_CR33_FCResponse
33	ACR925 ADR6_v3.0_20250317_Submission
34	BatchwanaBay_v3.0_20250310_ADR3_CR10_CR22_FCResponse_Submission
35	CR9_Astina CheckCruise Notes
36	ADR3_Completed Tally Sheets_230901
37	ACR925 Batchawana Bay Cut List Tree List Product Recalculation series
38	ACR925 Snag Model Calculations Worksheet v4.0_series

- 39 ACR925 RP1 Monitoring Report V1.0_20250623
- 40 ACR925 Batchawana Bay_ GHG Project Plan_v5.0_20250623
- 41 ACR925 Batchawana Bay_ GHGPP_Calculations_v4.1_20250620_FINAL
- 42 ACR925 Batchawana Bay_ GHG Project Plan_20250904_v1.2.pdf
- 43 ACR925 RP1 Monitoring Report V2.2_20250821_Signed.pdf
- 44 ACR925-ESI-Assessment-Repot-v2.0-20250827.pdf
- 45 ACR925-SDG-Cont-Report-AFOLU-Project-v3.0_20250828.pdf
- 46 Attachment_A_20250821.pdf
- 47 Figure A-1. Vicinity Map with Latitude and Longitude.pdf
- 48 ACR925 Batchawana Bay_ GHG Project Plan_v1.3_20250926_Signed.pdf
- 49 ACR925 RP1 Monitoring Report v3.0_20250926_Signed.pdf

APPENDIX B—LIST OF FINDINGS

Includes Corrective Action Requests (CAR), Non-Material Findings (NMs), Additional Documentation Requests (ADR), and Clarification Requests (CR), as necessary.

[illegible]

