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Ver 9 December 2020

**Forest Ecosystem Restoration  
Verification  
Assessment  
Report for:  
Trees Everywhere in  
France**

Report Finalized: 17/03/2021  
Audit Dates: 15 et 16/12/2020  
Audit Team: Philippe Casanova, Lead Auditor

Verification issue/expiry: 07/07/2021 to 06/07/2022  
Organisation Contact: Monsieur Olivier de MONTETY  
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## INTRODUCTION

This report presents the findings of an independent verification audit conducted by a team of specialists representing Preferred by Nature. The purpose of the audit was to evaluate the ecological, economic and social performance of Trees Everywhere restoration initiative as defined by the established Forest Ecosystem Restoration Standard by Preferred by Nature.

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Impartiality commitment: Preferred by Nature commits to using impartial auditors and our clients are encouraged to inform Preferred by Nature management if violations of this are noted. Please see our Impartiality Policy here: <http://www.Preferred by Nature.org/impartiality-policy>

# 1 AUDIT CONCLUSIONS

## 1.1 Audit Recommendation and verification decision

Based on Organisation's conformance with verification requirements, the following recommendation is made:

- Verification approved:  
Upon acceptance of NCR(s) issued below
- Verification not approved:

Additional comments, including issues identified as controversial or hard to evaluate and explanation of the conclusion reached: NA

## 1.2 Non-conformity Reports (NCRs)

- Check if no NCR(s) have been issued

<b>NCR: 01/20</b>	<b>NC Classification: Minor</b>
<b>Standard &amp; Requirement:</b>	FER Standard #1.2.
<b>Report Section:</b>	ANNEX I
<b>Description of Non-conformance and Related Evidence:</b>	
On the day of the audit, the governance system presented was incomplete. The objectives set and the method for taking stakeholders into account were not specified. <u>Evidence:</u> <ul style="list-style-type: none"> <li>• Interview of Monsieur Olivier de Montety</li> <li>• PSG_FINAL_TEW</li> </ul>	
<b>Corrective action request:</b>	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
<b>Timeline for Conformance:</b>	12 months from the report date.
<b>Evidence Provided by Organisation:</b>	After the PSG audit I have reviewed and a procedure is written. <u>Evidence :</u> <ul style="list-style-type: none"> <li>• Interview to Monsieur Olivier de Montety</li> <li>• 3 PSG_révisé_TEW</li> <li>• 1 Cahier_Procédures_Tew māj 30/12/2020</li> </ul>
<b>Findings for Evaluation of Evidence:</b>	The company has taken actions to improve its governance and comply with the requirements of the framework (stakeholder procedure, procedure for handling complaints and conflict resolution, supervision of subcontracting, labor rights risk analysis, procedure for verification of survival and growth rates).

<b>NCR Status:</b>	<b>CLOSED</b>
<b>Comments (optional):</b>	

<b>NCR: 02/20</b>	<b>NC Classification: Minor</b>
<b>Standard &amp; Requirement:</b>	FER Standard # 1.5
<b>Report Section:</b>	ANNEX I
<b>Description of Non-conformance and Related Evidence:</b>	
<p>It is difficult to specify who is directly affected by the project since it is a private project on private land, neither the nature nor the proximity of which is likely to negatively impact stakeholders.</p> <p>On the other hand, the fact of outsourcing the employment of labor on the plantation needs to be formalized and be more transparent. Only a budget was presented.</p> <p><u>Evidence :</u></p> <ul style="list-style-type: none"> <li>• Interview to Monsieur Olivier de Montety</li> <li>• PSG_FINAL_TEW</li> <li>• Budget ESAT</li> <li>• Interview ESAT</li> </ul>	
<b>Corrective action request:</b>	<p>Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.</p> <p>Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</p>
<b>Timeline for Conformance:</b>	12 months from the report date.
<b>Evidence Provided by Organisation:</b>	<p>Evidence :</p> <ul style="list-style-type: none"> <li>- 1 Cahier_Procédures_TEW p 3 sous-traitance</li> <li>- 1 Cahier_Procédures_TEW p 2 Procédure parties prenantes :</li> <li>- 8 Contrat ESAT respect droit travail</li> </ul>
<b>Findings for Evaluation of Evidence:</b>	TreesEverywhere both improved its procedures by documenting the use of outsourcing and informing stakeholders, and signed a contract with its subcontractor.
<b>NCR Status:</b>	<b>CLOSED</b>
<b>Comments (optional):</b>	

<b>NCR: 03/20</b>	<b>NC Classification: Minor</b>
<b>Standard &amp; Requirement:</b>	FER Standard # 1.6.3
<b>Report Section:</b>	ANNEX I
<b>Description of Non-conformance and Related Evidence:</b>	
<p>During the audit, the elements presented by the auditee did not allow a clear answer to this question. Minor NC was raised because there is a lack of evidence, but the company's approach seems to be in the long term.</p> <p><u>Evidence :</u></p> <ul style="list-style-type: none"> <li>• Interview to the co-founder of the organization, in charge of projects</li> <li>• PSG_FINAL_TEW</li> </ul>	

<b>Corrective action request:</b>	<p>Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.</p> <p>Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</p>
<b>Timeline for Conformance:</b>	By the next annual surveillance audit, but not later than 12 months from report finalization (30/12/2021)
<b>Evidence Provided by Organisation:</b>	<p>A signed commitment from the co-founder and a revised version of the PSG were presented.</p> <p><u>Evidence :</u></p> <ul style="list-style-type: none"> <li>• Interview to the co-founder of the organization, in charge of projects</li> <li>• 3 PSG_révisé_TEW</li> <li>• 1 Cahier_Procédures_Tew</li> <li>• 7 PROJET Auto ORE Montety Boursay</li> </ul>
<b>Findings for Evaluation of Evidence:</b>	TreesEverywhere has now confirmed its long-term commitment and clarified its ability to ensure the sustainability of the project.
<b>NCR Status:</b>	<b>CLOSED</b>
<b>Comments (optional):</b>	

<b>NCR: 04/20</b>	<b>NC Classification: MAJOR</b>
<b>Standard &amp; Requirement:</b>	FER Standard # 3.12
<b>Report Section:</b>	ANNEX I
<b>Description of Non-conformance and Related Evidence:</b>	
<p>The company has provided evidence of legal compliance, but has not provided evidence that the risk assessment has been taken into account, nor the demands placed on service providers operating in the management area.</p> <p>NC major as the impact of the gap can be significant.</p> <p><u>Evidence :</u></p> <ul style="list-style-type: none"> <li>• Interview to the co-founder of the organization</li> <li>• Analyse documentaire</li> <li>• Documents CESU du 25/05/20 , 29/06/20 , 27/07/20 ,24/08/20, 28/09/20, 26/10/20</li> <li>• Working contract of Agathe LEHR 01/09/20</li> <li>• Interview to Madame Agathe LEHR</li> </ul>	
<b>Corrective action request:</b>	<p>Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.</p> <p>Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</p>
<b>Timeline for Conformance:</b>	Prior to certification

<b>Evidence Provided by Organisation:</b>	The organization provided new evidence : <ul style="list-style-type: none"> <li>- Dossier ESAT comprenant :3. Plan de Prévention des Risques, 16 releve de situation comptable URSSAF ESAT, ARCADE Avis de situation SIREN_1, DEVIS TREES EVERYWHERE, FRANCE FORMATION TH MANIPULATION EXTINCTEURS ET EVACUATION</li> <li>- 1 Cahier_Procédures_Tew avec chapitre santé sécurité māj 30/12/2020</li> </ul>
<b>Findings for Evaluation of Evidence:</b>	The documents provided allow the organization to comply with the requirements of the standard in terms of health and safety while ensuring that the subcontractors also comply with them.
<b>NCR Status:</b>	<b>CLOSED</b>
<b>Comments (optional):</b>	

### 1.3 Observations

*Note: Observations are issued for the early stages of a problem which does not of itself constitute a non-conformance, but which the auditor considers may lead to a future non-conformance if not addressed by the organization; observations may lead to direct non-conformances if not addressed.*

No observations

<b>OBS: 01/20</b>	<b>Standard &amp; Requirement:</b>	FER Standard # 1.4.1
	<b>Report Section</b>	ANNEX I
<b>Description of findings leading to observation:</b>	The project is in its launch phase. There is not yet any reliable data to confirm that the Trees-Everywhere method, inspired by MIYAWAKI, achieves the set objectives.	
<b>Observation:</b>	The effectiveness at lower cost of the approach adapted to France on small sites remains to be demonstrated, which is the subject of TreesEverywhere's Research & Development process defined in its PSG.	

<b>OBS: 02/20</b>	<b>Standard &amp; Requirement:</b>	FER Standard # 3.4
	<b>Report Section</b>	ANNEX I
<b>Description of findings leading to observation:</b>	Planting on BOURSAY 1, due to the first confinement, could not be followed-up adequately. The grass has passed the plants. In addition, the summer drought required water supply (which has not been quantified).	
<b>Observation:</b>	A follow-up should ensure the success of the first plantation on BOURSAY 1 and take the appropriate measures in the event of a deviation from the set objectives.	

## 1.4 Stakeholder consultation

TreesEverywhere listed the stakeholders before the audit and carried out various exchanges as defined in the document PSG\_FINAL\_TEW in chapter 2.

The auditor also contacted stakeholders on 12/15/2020 during the audit, with the aim of collecting information from different categories of stakeholders (see table below): subcontractors, suppliers, administrative authorities, associations.

The auditor sought to know the degree of information of the stakeholders, the quality and content of the relationship with regard to suppliers and subcontractors, and finally the remarks, reservations, potential criticisms on the objectives or the progress of the project in order to analyze the content and relevance of the answers provided by TreesEverywhere. Contact had also been made upstream with an expert in forest restoration, to ask him about the MIYAWAKI method.

The table below summarizes the issues identified by the assessment team with a brief discussion of each based upon specific interview and/or public meeting comments.

Principle/Subject Area	Stakeholder comment	Preferred by Nature response
<b>1: Planning</b>	No comments received	
<b>2: Tenure &amp; Security</b>	No comments received	
<b>3: Implementation</b>	Exaggerated impact: Forgetting about the other ecological qualities of the forest (age, maturity, importance of micro-habitats and connectivity).	Some comments may over-distort the positive impacts of the MIYAWAKI Method, but Trees-Everywhere has not made any exaggerated comments to the auditor. On the other hand, the adaptation of the method to France and its effectiveness remain to be proven. This is what the company seeks to do through scientific analyzes and the pilot project at BOURSAY.  It is a matter of planting forests on non-forest, non-agricultural plots, sometimes polluted or degraded, so it is difficult to compare with old-growth forests, but it is a question of inscribing in a long time, and the additionality.
	Watering: We shouldn't have to water trees because it creates root networks on the surface.	Watering was used to start the forest, and in exceptional situations (heatwave and prolonged drought) to prevent the young plants from dying. However, this point should be monitored because the ultimate goal of the Trees-Everywhere



		method is to do without intervention.
	You can't create a functional forest in 10 years. Way to create very expensive projects.	Trees-Everywhere did not tell the auditor that it wanted to create a functional forest in 10 years, but in 30 years, that is, respecting the natural maturity of trees.  The company claims that the cost per tree is between 4 and 10 €. Given the search for forest density, the cost per hectare is high.  The company seeks to analyze the cost related to positive externalities.
<b>4: Monitoring and Reporting</b>	No comments received	

## 1.5 Actions taken by Organisation Prior to Report Finalization

TreesEverywhere told the auditor that it was not used to the audit process, but that it had chosen the FSC certification to confront its approach to a demanding benchmark, to an independent third party, and that it would do everything as quickly as possible to close any gaps. Since the audit, TreesEverywhere has drafted procedures to integrate a complaints process, better meet health and safety requirements, or relationship with subcontractors, and revised the management plan to specify management objectives and their monitoring. They also provided new documents.

*Evidence :*

- Compil\_Doc\_TEW
- Cahier\_Procédures\_Tew
- PSG\_révisé\_TEW

## 2 AUDIT PROCESS

### 2.2 Certification Standard Used

Standards Used (including version):	<b>Forest Ecosystem Restoration – Field Verification Standard, vs 1.0</b>
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### 2.3 Audit Team and accompanying persons

Name	Role and qualifications
Philippe Casanova	<p>Lead Auditor.</p> <p>Philippe graduated from the Montpellier Business School in International Business and an MBA from the University of Mannheim (Germany) in international economic relations and development policies.</p> <p>He has 28 years of experience in managing international teams and 16 years of experience in Audit and development projects in Africa and Asia.</p> <p>For 10 years, he imported fair trade wood and bamboo products, worked for the international subsidiary of the Office National des Forêts (FRANCE), managed 5 teams of experts to support African countries in the preparation of the COP 21, and finally managed the FLEGT Independent Audit in Congo Brazzaville.</p> <p>He is now an independent consultant and PEFC / FSC COC and FSC FM auditor.</p>
Mateo Cariño Fraisse	<p>Reviser. Mateo is Land Use Program Manager at Preferred by Nature, with extensive experience in forestry and carbon auditing (FSC, PEFC, CCB, VCS, Gold Standard, Plan Vivo, Carbon Footprint Management, SAI, etc. ) and projects since 2000 internationally. Mateo has also provided training in forest audits, including High Conservation Values and Ecosystem Services, for over 15 years at the international level, and currently leads the Forest Ecosystem Restoration Initiative which aims to support the global effort to restoration by proving the responsibility on the ground of this growing trend.</p>

## 2.4 Audit Overview

*Note: The table below provides an overview of the audit scope and auditors. See standard checklist annex for specific details on people interviewed and audit findings per site audited.*

Site(s)	Date(s)	Main activities	Auditor(s)
Boursay	15-16 /02/20	Interviews	Philippe CASANOVA
Parcelles Boursay 1 et Boursay 2	15-16 /02/20	Field visit	Philippe CASANOVA
Parcelles Boursay 1 et Boursay 2	15-16 /02/20	Stakeholders interviews	Philippe CASANOVA
Total number of person days used: 1,5 = numbers of auditors participating 1 X number of days spent in preparation, on site and post site visit follow-up including stakeholder consultation 1,5.			

## 2.5 Description of Overall Audit Process

Trees-Everywhere is a French environmental services company created in April 2020 which offers companies massive carbon capture and biodiversity regeneration solutions through dense and varied reforestation in France. The planting programs are part of the climate and CSR (Corporate Social Responsibility) policy of companies and end with a certification process. To achieve maximum efficiency in carbon storage and restoration of biodiversity, Trees-Everywhere has based its scientific approach on the planting method of Japanese Professor Akira Miyawaki. Trees-Everywhere acts in accordance with the United Nations (UN) Sustainable Development Goals (SDGs) 13 and 15, relating to climate action and life on Earth.

The two plots of Boursay 1 and 2, respectively 1000 and 800 m<sup>2</sup>, that were the subject of this audit are the first steps in a vast research and development process with the aim of optimizing the planting method. These plots are private land, owned by the Co-co-founder of Trees-Everywhere.

Boursay 1 and 2, as well as all future plantings made by Trees-Eveywhere are not intended for logging. The company's search for FSC® certification only concerns the validation of its social and environmental approach.

The company's objective is to promote it to companies engaged in a CSR approach, with the objectives of carbon sequestration and the development of biodiversity, while rehabilitating land that has no prior agricultural or forestry use.

Ultimately, the company wishes to restore degraded, abandoned land and wasteland by planting trees, but the plots concerned by this audit do not correspond to these characteristics and will be used as a laboratory in order to validate scientific options.

As a result, the audit process consisted of visiting the two sites and discussing the days of the audit with the stakeholders (town hall, NGOs, suppliers, subcontractor, and the employee of the company).

### 2.5.1 List of FMUs selected for evaluation

FMU Name	Rationale for Selection
BOURSAY 1	Small land of 1000 m <sup>2</sup>
BOURSAY 2	Small land of 800m <sup>2</sup>

### 2.5.2 List of management aspects reviewed by assessment team

Type of site	Sites visited	Type of site	Sites visited
Road construction	0	Illegal settlement	0
Soil drainage	0	Bridges/stream crossing	0
Workshop	0	Chemical storage	0
Tree nursery	1	Wetland	0
Planned Harvest site	0	Steep slope/erosion	0
Ongoing Harvest site	0	Riparian zone	0
Completed logging	0	Planting	
Soil scarification	0	Direct seeding	1
Planting site	2	Weed control	0
Felling by harvester	0	Natural regeneration	2
Felling by forest worker	0	Endangered species	0
Skidding/Forwarding	0	Wildlife management	2
Clearfelling/Clearcut	0	Nature Reserve	0
Shelterwood management	0	Key Biotope	0
Selective felling	0	Special management area	0
Sanitation cutting	0	Historical site	0
Pre-commercial thinning	0	Recreational site	0
Commercial thinning	0	Buffer zone	0
Logging camp	0	Local community	0

### 3 Organization DETAILS

#### 3.2 Organization specific background information

<b>Ownership and land tenure description (legal and customary)</b>
This is a private property owned by the Co-Founder and Managing Director of Trees-Everywhere, Olivier de Montety.
<b>Legislative and government regulatory context</b>
There is no legislative constraint on the planting of trees on private property, and no logging will be carried out in accordance with the PSG.
<b>Environmental Context</b>
<p>The land is located in the town of BOURSAY at an altitude of 165 m and is gently sloping. Most of the forest region where Boursay 1 and Boursay 2 are located is based on flint clays, often covered with silt from the plateaux.</p> <p>The commune of Boursay benefits from a degraded oceanic climate of the central and northern plains and is characterized by a cool average temperature. Rainfall is quite high compared to the regional average with frequent late frosts. The impact of global warming is notable, leading to a decrease in rainfall, and an increase in maximum temperatures.</p> <p>The town of Boursay has a natural area of ecological, faunistic and floristic interest ZNIEFF. 2 to 300 m and a sensitive natural area the bocage de la gaudinière located 1.5 km.</p> <p>Before planting, the land concerned by the certification was a mowed meadow as a pleasure garden as seen in the photos presented to the auditor.</p> <p>An island of senescence made up of brambles, spontaneous releases of spontaneous releases of cherry trees to which are added plum, maple, 5 walnut, 2 cherry, 4 oak, 1 Marceau willow and a silver willow, willow saunas, black poplars, a walnut and a dead tree (apple tree) are left voluntarily on the land in addition to the plantations.</p>
<b>Socioeconomic Context</b>
<p>According to the testimony of the town hall, no context requiring special attention should be noted.</p> <p>At the moment this is on private land, but the company's ambition is to create an educational trail on the plantation. This one, made up of walking paths and panels, will allow the public to walk among the trees and consult information on the species planted.</p>

#### 3.3 General overview of the organization and scope

Trees-Everywhere is a young SAS founded on 04/22/2020.

Currently, Trees-Everywhere has a permanent employee, a Managing Director and a President - who are also the Co-Founders. The company used temporary staff through an ESAT for the plantation.

The plantation area is located on private land belonging to the Co-Founder of Trees-Everywhere, Mr. Olivier de Montety residing at 6 route de Sainte Agil 41270 BOURSAY

Evidence of ownership has been made to the auditor.

Two zones called “Boursay 1 forest” of 1000 m<sup>2</sup> and “Boursay 2 forest” of 800 m<sup>2</sup>, were defined and planted respectively on 11/22/2019 and 12/14/2020 for the second.