PROJECT REVIEW REPORT

Project ID	*562*
Project Name	*THE KASIGAU CORRIDOR REDD+ PROJECT PHASE I – RUKINGA SANCTUARY*
Program(s)	*VCS + CCB*
Verification Period	*01 JAN 2020 – 31 DEC 2020*
Project Proponent	*Wildlife Works Carbon LLC*
Methodology	*VM0009 v1.1*
Sectoral Scope(s)	*14 – AFOLU*
Validation/Verification Body (VVB)	*Aster Global Environmental Solutions*

Assessment Criteria	*VCS Standard, v4.1; CCB Standard, v3.1*
Date of First Issue	*14 December 2021*
Date of Final Issue	*29 December 2021*

Summary:

An accuracy review of the *Kasigau Corridor REDD+ Project Phase I – Rukinga Sanctuary* verification request has been conducted by Verra in accordance with Section 4.3 of the *Registration and Issuance Process*.

The accuracy review has raised 13 assessment findings and 2 minor finding detailed below. The VVB, in coordination with the project proponent, is hereby required to provide a response to the assessment findings presented in Section 1 and minor findings presented in Section 2. The assessment finding must be addressed to the satisfaction of Verra.

This project review report will be made publicly available. Confidential information may be provided as separate attachments.

1. ASSESSMENT FINDINGS

Finding 1

Section 2.1.1 of the *Monitoring Report CCB v2.0, VCS v3.0* requires that the project proponent provides a "summary description of the implementation status of the technologies/measures (e.g., plant, equipment, process, or management or conservation measure) included in the project." Additionally, it requires that the project proponent describe the "operation of the project activity(s) during this monitoring period, including any information on events that may impact the GHG emission reductions or removals and monitoring."

Section 2.1.1 of the monitoring report states, "the primary Project Activity is the conservation of the forest in the Project Area, which has been fully and successfully implemented and operated throughout the current monitoring period." Additionally, the project proponent clearly describes the activities implemented during the monitoring period; however, it is unclear how the activities described contribute to the conservation of the forest.

The project proponent is requested to clarify and update Section 2.1.1 of the monitoring report accordingly on how the activities implemented during this monitoring period contributed to the conservation of the forest in the Project Area.

Project Proponent Response:

We have added some additional text to specifically state how the project activities contributed to the conservation of the project area. However, due to the limitation that this section cannot be more than 1 page and the amount of information that is required to be included in this section we focus on project activity categories and state their contribution to forest conservation.

VVB Response:

The VVB team has reviewed the revised 7th Monitoring Report (M7) for The Kasigau Corridor REDD+ Project Phase I –Rukinga Sanctuary (v2.15, date of issue 20 December 2021) provided by the project proponent. The VVB team confirmed that Section 2.1.1 has been revised and text changes in paragraphs 2 and 3 now clearly describe how activities implemented during this monitoring period contributed to the conservation of the forest in the Project Area by addressing drivers of deforestation and forest degradation.

Verra Response:

The project proponent has added text to state how the project activities contributed to the conservation of the project area. The VVB has reviewed and revised the MR and confired that Section 2.1.1 has been revised. This finding is now closed.

Finding 2

Section 2.3.4 of the *Monitoring Report CCB v2.0, VCS v3.0* requires that project proponents "provide information about how grievance(s) have been received, resolved and documented using the project's grievance redress procedure during the monitoring period."

Section 2.3.4 of the monitoring report states that "A total of 10 comments were received from the Project communities in the monitoring period." The verification report states, "based on the supplemental documentation provided and reviewed, and results of interviews with PP representatives, community leaders, and community members, it appears that efforts were made to address reasonable grievances within an appropriate period of time and that the project's grievance redress procedure has been implemented in accordance with the project's validated design."

The VVB is required to clarify if the comments (specifically the two complaints raised) were addressed as grievances, if these were resolved and if any of these have a negative impact on community members. Additionally, please clarify if the comments, process, and conclusion was made publicly available.

Project Proponent Response:

VVB Response:

The VVB reviewed the Community Feedback Register – 2020, covering the feedback received by the project proponent during the monitoring period. The Register was determined to have appropriately logged feedback received from community members or other stakeholders through the options available to them consistent with the PD and options identified in Section 2.3.4 of the monitoring report. None of the feedback categorized as Complaint/Question was identifiable as a grievance with respect to FPIC, or with respect to rights to land, territory and resources, or with respect to participation. Review of the complaints and concerns attributed to the KCRPI project, based on origination in Kasigau Location, determined that all involved concerns primarily over the progress of local projects, bursary disbursements, or specific to local committees. These items were addressed through direct feedback for those given during meetings, or referral to appropriate LCC or Bursary Committee as applicable. Resolution of feedback items identified as Complaint/Question were dealt with publicly if presented during meetings, or made publicly available by referral to appropriate LCC or Bursary Committee.

Verra Response:

The VVB has confirmed that None of the feedback categorized as Complaint/Question was identifiable as a grievance with respect to FPIC, or with respect to rights to land, territory and resources, or with respect to participation. Resolution of feedback items identified as Complaint/Question were dealt with publicly if presented during meetings, or made publicly available by referral to appropriate LCC or Bursary Committee. This finding is now closed.

Finding 3

Section 2.4.3 of the *Monitoring Report CCB v2.0, VCS v3.0* requires that project proponents "demonstrate that people from the communities have been given an equal opportunity to fill all work positions during the monitoring period (including management) if the job requirements were met."

Section 2.4.3 of the monitoring report describes Wildlife Works Recruitment and Selection Policies; however, it is unclear if any positions were filled during this monitoring period following these policies.

The project proponent is requested to clarify if any positions were filled during this monitoring period.

Project Proponent Response:

We have revised section 2.4.3 to include the information on number of hires during the monitoring period. During the monitoring period the Kasigau Corridor projects (Phase I and Phase II combined) project hired 20 people, with 3 of those being attributed to the Phase I project. These hires were all made directly from the project communities located in the project zone. However, due to limitations resulting from the COVID pandemic these hires were all done as contracts and not permanent hires.

VVB Response:

The VVB team has reviewed the revised monitoring report provided by the project proponent. The VVB team confirmed that Section 2.4.3 has been revised and this section now includes information on the number of employees at the end of the monitoring period, the number contracted with the project attributed to the KCRPI project during the monitoring period, and that all staff contracted during the monitoring period were hired directly from the local project area.The VVB had previously determined through review of supplemental materials and interviews with project proponent representatives, managers for various project-supported businesses, and employees that the project emphasizes hiring local people and that people from local communities are given equal opportunity to fill open positions, with priority given to women and disadvantaged groups, though competency was identified as the top priority.

Verra Response:

The VVB confirms that Section 2.4.3 has been revised and this section now includes information on the number of employees at the end of the monitoring period, the number contracted with the project attributed to the KCRPI project during the monitoring period, and that all staff contracted during the monitoring period were hired directly from the local project area. This finding is now closed.

Finding 4

Section 4.3.9 of the *Verification Report CCB v2.0, VCS v3.0* requires that the VVB "identify, discuss, and provide conclusions regarding the assurances provided by the project that it is complying with

all national and local laws and regulations relevant to project activities and where relevant how compliance is achieved."

Section 4.3.9 of the verification report states "information presented in the PD and MR confirms that Wildlife Works has operated within all local and national employment laws for over 14 years"; however, it does not include any references to other laws and regulations beyond employment laws.

The VVB is requested to clarify how it was verified that the project is in compliance with all national and local laws and regulations relevant to project activities.

Project Proponent Response:

VVB Response:

The VVB has rectified this oversight and the Section 4.3.9 of the Verification Report has been revised to clarify how the VVB verified the project is in compliance with all national and local laws and regulations relevant to project activities, and not just employment laws.

Verra Response:

Section 4.3.9 of the Verification Report has been revised to clarify how the VVB verified the project is in compliance with all national and local laws and regulations relevant to project activities. This finding is now closed.

Finding 5

Section 3.2.1 of the *Monitoring Report CCB v2.0, VCS v3.0* requires that project proponents "Quantify the baseline emissions and/or removals, providing sufficient information to allow the reader to reproduce the calculation. Attach electronic spreadsheets as an appendix or separate file to facilitate the verification of the results."

Section 3.2.1 provides information on the baseline calculation; however, the monitoring report does not provide sufficient information to allow the reader to reproduce the calculation.

The project proponent is required to provide sufficient information to allow the reader to reproduce the calculation. Additionally, the project proponent is requested to provide electronic spreadsheets for our review.

Project Proponent Response:

We have revised section 3.2.1 to add in all of the relevant equations and the parameterization of each so that these can be observed and reproduced by readers. We have provided to Verra the electronic spreadsheet containing all of the carbon calculations with the responses to these findings.

VVB Response:

The audit team reviewed the updated MR, specifically section 3.2.1, and confirms that the MR now provides sufficient information to allow the reader to reproduce the calculations.

Verra Response:

Section 3.2.1 has been updated to include more information to allow the reader to reproduce the calculations. The project proponent has also shared the calculation worksheet with Verra. This finding is now closed.

Finding 6

Appendix B of the *Verification Report CCB v2.0, VCS v3.0* states that "The audit team confirmed in "Biomass Calculator, Rukinga Carbon Model and NERs_M=7_v2.5.xlsm" that the herbaceous was not accounted in the calculation" and to "please formally define the PD deviation and provide guidance from Verra that the approach taken is appropriate."

The project proponent responded that "For Phase II, herbaceous carbon was in fact removed from carbon accounting starting in m2 (the second monitoring period). We therefore propose to add the pool back in by extrapolating the stocks measured in m1 to the present day." However, it is unclear from the verification report if the issue is only for Phase II, and not for Phase I.

The project proponent is requested to clarify if the herbaceous pool was accounted in the calculation for Phase I for this monitoring period. If so, the explanation should be provided as a project description deviation in the monitoring report and documented in the calculations. The VVB is requested to update the verification report accordingly.

Additionally, please clarify if this pool was included in the calculation of the measured carbon stock in the fire area which was then compared to the average carbon stock for the Project Area.

Project Proponent Response:

The herbaceous carbon pool has been included in the Kasigau Corridor Phase I Project during all monitoring periods to date, and was continued to be included for this 7th monitoring period. Therefore there was no deviation from the PD or prior monitoring periods. The herbaceous carbon stock was included in the calculation of the resulting carbon stock after the fire. However, the fire had consumed all grass and shrubs, so these carbon pools were just assumed to be zero and given a value of "0" in the calculation of remaining carbon. The average project area carbon stock to which this was being compared did include the herbaceous and shrub carbon pools as well.

VVB Response:

The audit team reviewed the findings log (Appendix B of the MR) and it appears this issue is clearly addressed within the findings log. In short, the VVB agrees with the Project Proponents response that no PD Deviation is warranted as it was determined by VERRA that it is not allowable to drop a carbon pool in the middle of the crediting period resulting in the project including the herbaceous

pool for both phases.

Verra Response:

The PP and VVB have confirmed that the herbaceous carbon pool has been included in the Kasigau Corridor Phase I Project during all monitoring periods to date and was continued to be included for this 7th monitoring period. This finding is now closed.

Finding 7

Section 3.2.3.2 of the *Monitoring Report CCB v2.0, VCS v3.0* requires that project proponents "quantify leakage emissions providing sufficient information to allow the reader to reproduce the calculation."

Section 3.2.3.2 provides information on the leakage calculation; however, the monitoring report does not provide sufficient information to allow the reader to reproduce the calculation.

The project proponent is required to provide sufficient information to allow the reader to reproduce the calculation.

Project Proponent Response:

We have revised section 3.2.3.2 to include more detailed information on the calculation of the leakage model and demonstration of this so that readers can observe and reproduce these calculations.

VVB Response:

The audit team reviewed the updated MR, specifically section 3.2.3.2, and confirms that the MR now provides sufficient information to allow the reader to reproduce the calculations.

Verra Response:

The project proponent has revised section 3.2.3.2 to include more ifnormaiotn on the calculation of the leakage model. The VVB has confirmed that the MR provides sufficient information to allow the reader to reproduce the calculations. This finding is now closed.

Finding 8

Section 3.2.3.2 of the *Monitoring Report CCB v2.0, VCS v3.0* requires that project proponents "quantify leakage emissions providing sufficient information to allow the reader to reproduce the calculation."

Section 3.2.3.2 states that the activity shifting leakage was zero for this monitoring period; however, Section 4.4.1 of the verification report states that "activity shifting leakage was confirmed through a review of field measurements."

The VVB is requested to clarify if activity shifting leakage was present during this monitoring period.

Project Proponent Response:

There was found to be no activity shifting leakage during this monitoring period.

VVB Response:

The VVB confirms there was no activity shifting leakage during this monitoring period.

Verra Response:

The VVB has confirmed that there was no activity shifting leakage during this monitoring period. This finding is now closed.

Finding 9

Section 8.2 of the *Methodology for Avoided Ecosystem Conversion (VM0009)* states that "emissions from forest fire, grass fire, natural disturbances and logging are inherently captured by the monitoring of carbon stocks in the project area. Total project emissions for the current monitoring period can be negative if some major disturbance event occurs. The project proponent must have sufficient ongoing observation of the project lands such that disturbance that is likely to be greater than de minimis will be detected."

Section 3.2.2.1 of the monitoring report states that there was one wildfire inside of the Project Area during this period that had disturbed an area of 2,068.29 ha. It also mentions that for the fire event that occurred during the m7 monitoring period it was determined that it did not result in a significant emission. Table 7 states that there was a carbon stock difference of 5.37 tCO2e/ha. Section 3.2.4.4 states that project emissions were considered as zero.

The project proponent is required to document in the monitoring report the total amount of GHG emissions that were estimated from the forest fire and provide adequate justification as why they are reported as zero.

Project Proponent Response:

We have revised section 3.2.2.1 of the monitoring report to include the requested information. Table 7 now includes the calculated emission from the fire area, and a discussion was added to the section providing a description of the process used to determine whether the carbon reduction observed in the fire area was significant or within the bounds of what may be expected given the heterogeneity of the forest, natural variation and distribution of the forest inventory plots.

VVB Response:

The VVB reviewed this demonstration in detail during the verification. The audit team believes there is now sufficient information in the MR to understand and confirm the analysis.

Verra Response:

The project proponent has included more information on the MR related to the fire. The VVB confirms there is now sufficient information in the MR to understand and confirm the analysis. This finding is now closed.

Finding 10

Section 4.1.1. of the *Monitoring Report CCB v2.0, VCS v3.0* requires that project proponents "describe all the impacts on each community group (identified in the validated CCB project description in conformance with G1) resulting from project activities under the with-project scenario. Impacts must include all those identified in the CCB project description and any other unplanned impacts."

Section 4.1.1. describes the causal model and associated theory of change process implemented in the communities; however, it does not provide information of the impacts on each community group resulting from project activities under the with-project scenario.

The project proponent is required to clarify the impacts on each community group identified in the validated CCB PD in conformance with G1.

Project Proponent Response:

The project's CCB PD in section G1 identifies 2 community groups: the Taita and the Duruma. We have revised section 4.1.1 to add the required information on the impacts of the project activities to these 2 community groups.

VVB Response:

The VVB team has reviewed the revised monitoring report provided by the project proponent. The VVB team confirmed that Section 4.1.1 has been revised and this section now includes information on the community groups and documents how impacts were determined for the Taita and Duruma, the two community groups identified in the CCB Project Design Document (dated December 2008). The VVB had previously determined through review of supplemental materials and interviews with community stakeholders that the project is viewed as having positive impacts on the community groups for the identified key focal issues.

Verra Response:

Section 4.1.1 has been revised to add the required information on the impacts of the project activities to 2 community groups, the Taita and Duruma. This finding is now closed.

Finding 11

Section 4.3.2 of the *Monitoring Report CCB v2.0, VCS v3.0* requires that project proponents "Present the results of the community impact monitoring which should include all communities, community groups, other stakeholders, and HCVs related to community well-being identified in the monitoring plan."

Section 4.3.2 provides details and results for M7 for the indicators identified during the community SIA; however, it is unclear how these are related to communities, community groups or other stakeholders.

The project proponent is required to clarify how the results for the indicators are related to different stakeholders, if applicable.

Project Proponent Response:

We have revised section 4.3.2 to provide a description of how the indicators relate to the project stakeholders, which is the project area communities in general. All project impacts are felt by the community at large, and bring benefits to them equally. Therefore, all of the indicators demonstrate project performance and benefits to the general project stakeholder group of project communities.

VVB Response:

The VVB team has reviewed the revised monitoring report provided by the project proponent. The VVB team confirmed that Section 4.3.2 has been revised and this section now includes information clarifying how the results reported for indicators relate to the community as a whole based on the community groups not being spatially separated. More detailed information following Table 13 provides impacts by location. The additional information provided in Section 4.3.2 clarifies that the proportion of benefits to community groups within the different locations is understood should reflect the proportion of these community groups within these locations. Additional information added by the project proponent to Section 4.1.1 provides clarification on the role Locational Carbon Committees (LCCs) play in determining the apportionment and distribution of benefits allocated to each location, clarifies that the LCC membership is elected within each location, and provides documentation demonstrating the proportion of community groups membership on each LCC and the proportion each community group contributes to the population of each location.

Verra Response:

The VVB has confirmed that Section 4.3.2 has been revised and includes information clarifying how the results reported for indicators relate to the community as a whole based on the community groups not being spatially separated. This finding is now closed.

Finding 12

Section 5.1.4 of the *Monitoring Report CCB v2.0, VCS v3.0* requires that project proponents to describe the adverse effect of non-native species.

Section 5.1.4 states that there are non-known adverse effects for the Jojoba (*Simmondsia chinensis*) or fruit and nut species including assorted citrus, mango, passion and cashew.

The project proponent is required to justify this statement.

Project Proponent Response:

We have revised section 5.1.4 to include a justification for the determination that there are no known adverse effects from these non-native species. Although these species are not native to this region, they are widely grown and propagated, and in the case of the fruit and nut trees, have been for over a hundred years. Despite this they have demonstrated that they do not become invasive or have other negative ecological affects.

VVB Response:

The VVB team has reviewed the revised monitoring report provided by the project proponent. The VVB team confirmed that Section 5.1.4 has been revised and this section now includes referenced information justifying the statements that there are no known adverse impacts for either jojoba or the various fruit/nut species. The VVB concurs the additional information and citations for the conclusions reached, combined with previous verification by the VVB of these species against the ISSG database on 2 July 2021 substantiate the statements regarding impacts of these non-native species.

Verra Response:

The VVB has confirmed that Section 5.1.4 has been revised and justifies the statements that there are no known adverse impacts for either jojoba or the various fruit/nut species. This finding is now closed.

Finding 13

Section 5.3.2 of the *Monitoring Report CCB v2.0, VCS v3.0* requires that project proponent present the results of the biodiversity impact monitoring.

Section 5.3.2 states that there was an increase in the number of incidents and that "an effectiveness analysis is currently underway to try and tease out the cause of the trend, considering the consistent use of aerial patrols since 2017 which enhanced effectiveness of locating incidents, especially log heaps and charcoal kilns (dark green and dark blue numbered blocks."

The VVB is requested to raise a FAR in order for the project to finalize the effectiveness analysis and determine if the potential issue of an increase in incidents in the project area need to be addressed in the future.

Project Proponent Response:

VVB Response:

The VVB has added reference to a FAR in Section 4.6.8 of the Verification Report, and added the FAR to the Forward Action Request section (2.6.1) of the Verification Report to address this request.

Verra Response:

It is confirmed that a FAR has been raised in section 2.6.1 of the Verification Report. This finding is now closed.

2. MINOR FINDINGS

Section 1.1. of the monitoring report summary, under the section reference states “Error! Reference source not found.” The project proponent is requested to fix the error.

Section 2.1.10 of the Monitoring Report CCB v2.0, VCS v3.0 requires that the project proponent “describe how the project contributes to achieving any nationally stated sustainable development priorities, including any provisions for monitoring and reporting same.” Section 2.1.10 of the monitoring report describes the benefits that will help achieve Kenya’s stated Sustainable Development Goals; however, it does not include information on any provisions for monitoring or reporting these. The project proponent is requested to include in the future any provisions for monitoring and reporting the contributions achieved to any SDGs.

3. ASSESSMENT CONCLUSION

On 11 December 2021, Verra completed an accuracy review of Project ID 562, *the Kasigau Corridor REDD+ Project Phase I – Rukinga Sanctuary*, the results of which can be found above.

On 15 December 2021, Verra sent the findings report to the project proponent and Aster Global.

On 29 December 2021, Aster Global responded to the findings

On 29 December 2021, Verra closed all findings.