Climate, Community, and Biodiversity Alliance
Project Annual Verification Report

Wildlife Works

Kasigau Corridor REDD+ Project Phase I – Rukinga Sanctuary

23 May 2013

Project No. VO12103.00

Verification Conducted by:

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ANSI ACCREDITED PROGRAM
GREENHOUSE GAS
VALIDATION AND VERIFICATION
0800

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Climate, Community, and Biodiversity Alliance
Kasigau Corridor Phases I Verification Report

Introduction

This report presents the findings of an audit conducted by Environmental Services, Inc. (ESI), to the claims made by Wildlife Works Carbon, LLC Kasigau Corridor Phase I project PIR conform to the Climate, Community, and Biodiversity Project Design Standards (Second Edition-December 2008). ESI is accredited by the American National Standards Institute (ANSI) under ISO 14065:2007 for greenhouse gas validation and verifications bodies, which approves us to perform validations/verifications for the Climate, Community, and Biodiversity Alliance (CCBA).

Contact Information

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Verification Details

Verification Standard	Climate Community and Biodiversity Standard (Second Edition – December 2008)
Verification Criteria	The criteria will follow the validation guidance documents provided by CCBA located at www.climate-standards.org. These documents include the following: a) *Project Design Standards (Second Edition, December 2008)* b) *Rules for the use of the Climate, Community, & Biodiversity Standards, Version June 21, 2010.*
Level of Assurance	The level of assurance was used to determine the depth of detail that the verifier placed in the verification plan to determine if there were any errors, omissions, or misrepresentations (ISO 14064-3:2006). ESI selected samples of data and information to be validated and verified, to provide *reasonable assurance.*
Verification Scope	The scope of the verification, included the GHG project and baseline scenarios; physical infrastructure, activities, technologies and processes of the GHG project; GHG sources, sinks and/or reservoirs; types of GHG's; periods covered; and the evaluation of the project's net climate, community, and biodiversity benefits. Period of evaluation: 1 January 2012 to 31 December 2012.
Verification Date(s)	27 January 2013 – 17 May 2013
Materiality	Materiality is a concept that errors, omissions and misrepresentations could affect the project design assertions and influence the intended users. CCB does not specifically outline a materiality threshold; however, ESI used a 5% threshold for evidence. If a non-conformance was discovered, the project developer was given the opportunity to correct the non-conformity to the project design document within a reasonable timeframe (within 30 days).
Site Visits	27 January 2013 – 1 February 2013

Verification Team	Lead Verifier: Shawn McMahon Team Members: Caitlin Sellers, Stewart McMorrow, Richard Scharf, Chris DeRolph, James Moody and Terese Walters. Trainees: Jonathan Pomp QA/QC: Janice McMahon
Final Documents from Client	• Kasigau Corridor REDD Project Phase I – Rukinga Sanctuary 3rd Monitoring Report, 14 March 2013 • Kasigau Corridor REDD Project Phase I – Rukinga Sanctuary Project Design Document, ver. 2. Please see Appendix A for a complete list of documents received/reviewed during this verification.
Public Comment Period on CCBA Number of Comments Received	25 January 2013 – 24 February 2013 Project Posting of Project Implementation Report on CCB website for public comment o No Comments Received

Project Description

Kasigau is a REDD project that reduces emissions through forest protection and providing sustainable alternative sources of forest products, like charcoal, and providing sustainable alternative ways for the local people to make a living.

The project activities include:

- Sagalla Conservation and Development Forum (SCDF), Mwatate District Stakeholders' Forum (MDSF) and Mwachabo Development Forum (MDF) – community development.
- Organic Greenhouses – provides trees, employment and local research into growing techniques. (Phase I only.)
- Financial Aid to Marungu Hill Conservancy Association
- Jojoba propagation & extension into the Community – new crop and potentially new source of income for local farmers. (Phase I only)
- Reforestation of Mt. Kasigau
- Wildlife Works REDD Forest and Biodiversity monitoring
- Community Wildlife Scouts
- Kasigau Development Trust
- REDD Carbon Inventory Monitoring
- Ecotourism Projects
- School Construction and Bursary Scheme
- Group Ranch Office Renovations / Construction

- Wildlife Works Eco-Charcoal Production Facility for the Kasigau Corridor REDD Project
- Wildlife Works/Tsavo Soap Factory – local employment.
- Wildlife Works REDD Project Product Sales and Marketing

Executive Summary of Verification Results

	Criterion	Required/ Optional	Conformance Y/N N/A
G1	Original Conditions in the Project Area	Required	Y
G2	Baseline Projections	Required	Y
G3	Project Design and Goals	Required	Y
G4	Management Capacity and Best Practices	Required	Y
G5	Legal Status and Property Rights	Required	Y
CL1	Net Positive Climate Impacts	Required	Y
CL2	Offsite Climate Impacts ("Leakage")	Required	Y
CL3	Climate Impact Monitoring	Required	Y
CM1	Net Positive Community Impacts	Required	Y
CM2	Offsite Stakeholder Impacts	Required	Y
CM3	Community Impact Monitoring	Required	Y
B1	Net Positive Biodiversity Impacts	Required	Y
B2	Offsite Biodiversity Impacts	Required	Y
B3	Biodiversity Impact Monitoring	Required	Y
GL1	Climate Change Adaptation Benefits	Optional	Y
GL2	Exceptional Community Benefits	Optional	n/a
GL3	Exceptional Biodiversity Benefits	Optional	Y

Verification Findings

Section G1

G1 Original Conditions in the Project Area

Indicator 1 – The location of the project and basic physical parameters (e.g. soil, geology, climate).	Project is located in Taita Taveta County, Kenya. A brief description of the climate, soils and geology, along with maps depicting project boundaries, are provided.
Evidence Used to Assess Conformance:	Sections 1.2 and 4.3 of the PIR and site visit.
Findings:	Indicator was adequately satisfied during project validation. Verification confirms project location and other physical parameters have not changed.

Indicator 2 – The types and condition of vegetation within the project area.	Phase I includes patches of montane forest, dryland forest and savannah grassland. Phase I also includes some abandoned agricultural land. A list of tree species is included.
Evidence Used to Assess Conformance:	Sections 1.2 of the original PDD and site visit.
Findings:	Indicator was adequately satisfied during project validation and reconfirmed during this verification.

Indicator 3 – The boundaries of the project area and the project zone.	Maps of the project areas and project zone are provided.
Evidence Used to Assess Conformance:	Sections 1.2 and 4.3 of the PIR, sections 1.3 of the original PDD and site visit.
Findings:	Indicator was adequately satisfied during project validation and reconfirmed during this verification.

Indicator 4 - Current carbon stocks within the project area(s), using stratification by land-use or vegetation type and methods of carbon calculation (such as biomass plots, formulae, default values) from the Intergovernmental Panel on Climate Change's 2006 Guidelines for National GHG Inventories for Agriculture, Forestry and Other Land Use[5] (IPCC 2006 GL for AFOLU) or a more robust and detailed methodology.	Using VM0009, Methodology for Avoided Mosaic Deforestation of Tropical Forests, V1.1, baseline carbon stocks on Phase Iof the project were calculated correctly and verified concurrent to this annual verification. The current carbon stocks for each project can be found in the Monitoring Report for each project as well as summarized here. Phase I Biomass: 2,527,643 Mt CO_2e Soils: 12,370,530 Mt CO_2e
Evidence Used to Assess Conformance:	Rukinga CCB PDD, Version 2.0, Phase I PD.
Findings:	Two different methodologies described in the PDD, without explanation as to the reason for the change.
Non-Conformance Report (NCR):	Please clarify why the Rukinga PDD refers to the AD Partners Methodology, but subsequent documents only refer to VCS methodology VM0009.
Date Issued:	25 February 2013
Project proponent response/actions and date:	NCR Accepted The Rukinga CCB PDD was the first document that was prepared and submitted for the Phase I Project. At the time that it was written there were not any

	approved VCS REDD methodologies. The AD Partners methodology was chosen for use as it was the most developed at the time. Subsequent to writing the CCB PDD, Wildlife Works decided to develop its own Methodology. All carbon analysis for the Phase I Project has always used the VCS Methodology VM0009. The reference to the AD Partners Methodology in the PDD is just a relic to how the industry and this Project evolved during its development.
Evidence used to close NCR:	Revised PIR.
Date closed:	22 March 2013

Indicator 5 - A description of communities located in the project zone, including basic socio-economic and cultural information that describes the social, economic and cultural diversity within communities (wealth, gender, age, ethnicity etc.), identifies specific groups such as Indigenous Peoples[8] and describes any community characteristics.	The PDD describes two communities within the project zone, the Taita and the Duruma, their general history in the area and their condition.
Evidence Used to Assess Conformance:	Sections G1.5 of the PDD and site visit.
Findings:	Indicator was adequately satisfied during project validation. Site visit offered additional confirmation.

Indicator 6 - A description of current land use and customary and legal property rights including community property in the project zone, identifying any ongoing or unresolved conflicts or disputes and identifying and describing any disputes over land tenure that were resolved during the last ten years (see also G5).	The land was used for cattle grazing, but the market broke down decades ago and is now largely idle. Some grazing still goes on, mostly illegally by Somali herdsmen. Property is divided into "ranches" that are mostly communally owned by shareholders. Some subsistence farming and grazing goes on in the project zone. The project zone also includes adjacent Tsavo National Park.
Evidence Used to Assess Conformance:	Sections G1.6 of the PDD, perusal of deeds and land transactions and interviews with ranch board members during site visit.
Findings:	Indicator was adequately satisfied during project validation. Site visit offered additional confirmation

	that this continues to be addressed.

Indicator 7 - A description of current biodiversity within the project zone (diversity of species and ecosystems) and threats to that biodiversity, using appropriate methodologies, substantiated where possible with appropriate reference material.	The PDD described the ecosystems and animals known to be on project lands and the project zone. Threats include habitat destruction and poaching. A robust biodiversity monitoring plan is being implemented.
Evidence Used to Assess Conformance:	Sections G1.7 of the PDD, sections 2.2.11 and 8.1 of the PIR, interviews conducted during site visit.
Findings:	Indicator was adequately satisfied during project validation. Site visit confirmed. A robust monitoring program is active. Site visit offered additional confirmation.

Indicator 8 - An evaluation of whether the project zone includes any of the following High Conservation Values (HCVs) and a description of the qualifying attributes. **Indicator 8.1** - Globally, regionally or nationally significant concentrations of biodiversity values: a. protected areas b. threatened species c. endemic species d. areas that support significant concentrations of a species during any time in their lifecycle (e.g. migrations, feeding grounds, breeding areas). **Indicator 8.2** - Globally, regionally or nationally significant large landscape-level areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance. I**ndicator 8.3** Threatened or rare ecosystems.	The PDD explains the project zone includes HCVs by virtue of indicators 1.8.1b and d, as well as indicators 8.2 through 8.6.

Indicator 8.4 - Areas that provide critical ecosystem services (e.g., hydrological services, erosion control, fire control). **Indicator 8.5** - Areas that are fundamental for meeting the basic needs of local communities (e.g., for essential food, fuel, fodder, medicines or building materials without readily available alternatives). **Indicator 8.6** - Areas that are critical for the traditional cultural identity of communities (e.g., areas of cultural, ecological, economic or religious significance identified in collaboration with the communities).	
Evidence Used to Assess Conformance:	Sections 1.8 of the PDD, data from biodiversity monitoring program (sections 2.2.11 of the PIR), wildlife seen during site visit and interviews with staff.
Findings:	Indicator was adequately satisfied during project validation, and reconfirmed during verification through interviews with project staff, community members and direct observation.

G2 Baseline Projections

Indicator 1 - Describe the most likely land-use scenario in the absence of the project following IPCC 2006 GL for AFOLU or a more robust and detailed methodology, describing the range of potential land use scenarios and the associated drivers of GHG emissions and justifying why the land-use scenario selected is most likely.	The likely baseline scenario is continued loss of forests, especially those most prized for charcoal production, overgrazing, habitat, soil erosion, land productivity and increased pressure on dwindling wildlife populations.
Evidence Used to Assess Conformance:	Sections 4.4 of the Phase I PIR, site visit.
Findings:	There is clear evidence of past illegal charcoal

	production (former kiln sites, stumps) and armed poachers were captured and stashed tusks discovered during the site visit. The likely without-project scenario described in the PIR is again confirmed.

Indicator 2 - Document that project benefits would not have occurred in the absence of the project, explaining how existing laws or regulations would likely affect land use and justifying that the benefits being claimed by the project are truly 'additional' and would be unlikely to occur without the project.	The project proponent shows that project activities would not have occurred without the project, and it is likely that slash and burn agriculture would have been the primary land use.
Evidence Used to Assess Conformance:	Sections 4.5 of the PIR and site visit.
Findings:	This indicator was adequately addressed during project validation, reconfirmed during verification through interviews with community members, project staff and direct observation during the site visit.

Indicator 3 - Calculate the estimated carbon stock changes associated with the 'without project' reference scenario described above. This requires estimation of carbon stocks for each of the land-use classes of concern and a definition of the carbon pools included, among the classes defined in the IPCC 2006 GL for AFOLU. The timeframe for this analysis can be either the project lifetime (see G3) or the project GHG accounting period, whichever is more appropriate. Estimate the net change in the emissions of non-CO_2 GHG emissions such as CH_4 and N_2O in the 'without project' scenario. Non-CO_2 gases must be included if they are likely to account for more than 5% (in terms of CO_2-equivalent) of the project's overall GHG impact over each monitoring period.	Project is undergoing concurrent VCS verification that adequately covers the requirements of this indicator. The project has been previously validated and verified to the VCS Standard. As such the current effort is towards an annual verification of the project activities and monitoring calculations.

Projects whose activities are designed to avoid GHG emissions (such as those reducing emissions from deforestation and forest degradation (REDD), avoiding conversion of non-forest land, or certain improved forest management projects) must include an analysis of the relevant drivers and rates of deforestation and/or degradation and a description and justification of the approaches, assumptions and data used to perform this analysis. Regional-level estimates can be used at the project's planning stage as long as there is a commitment to evaluate locally-specific carbon stocks and to develop a project-specific spatial analysis of deforestation and/or degradation using an appropriately robust and detailed carbon accounting methodology before the start of the project.	
Evidence Used to Assess Conformance:	Sections G2.3 of the Phase I PDD, sections 6.1 of the latest PIR.
Findings:	VCS verification of the 2012 Monitoring Period is approved and as such, this indicator and its requirements are considered to be adequately covered through that concurrent effort. Please see the 2012 project Monitoring Report for further information.

Indicator 4 - Describe how the 'without project' reference scenario would affect communities in the project zone, including the impact of likely changes in water, soil and other locally important ecosystem services.	Without the project, soil erosion with its associated soil carbon and fertility losses would increase. There would be continuing loss of forest cover and continued subsistence poaching. The economic situation in the local communities would not have benefited from the direct employment of locals, and the many students who have benefited from the bursary scheme may not have been able to attend secondary school.
Evidence Used to Assess Conformance:	Sections 4.4 and 4.5 of the phase I PIR, interviews with chiefs, employees of the several businesses on the project site, directors of the community ranches, rangers and CBO officials.

Findings:	Indicator G2.4 has been adequately addressed.

Indicator 5 - Describe how the 'without project' reference scenario would affect biodiversity in the project zone (e.g., habitat availability, landscape connectivity and threatened species).	Little wildlife existed on the phase I project area (Rukinga Ranch) and little existed in the project areas outside the national parks. With continued charcoal manufacturing, habitat would continue to be fragmented and degraded.
Evidence Used to Assess Conformance:	Section 4.4 of the phase I PIR, site visit, interviews with rangers, including Eric Sagwe.
Findings:	Indicator G2.5 has been adequately addressed during validation and confirmed during this annual verification and site visit.

Section G3 Project Design and Goals

Indicator 1 - Provide a summary of the project's major climate, community and biodiversity objectives.	The projects' major objectives include: • prevent the emission of 7,000,000 tonnes CO2e over the thirty year crediting period, • Make project financially sustainable, • prevent biodiversity loss, • Expand the influence of project developer's methods to surrounding lands, • Manage protection of the corridor. • Garner long-term community support, • invest in alternative livelihood creation, • educational outreach on conservation • expand organic greenhouses, • community woodlots • jojoba as a new crop • biodiversity training and research • Expand ecocharcoal project.
Evidence Used to Assess Conformance:	Sections 1.1 and 2.2 of the PIR, site visit.
Findings:	Indicator G3.1 was adequately addressed during validation and confirmed during verification site visit through interviews with staff and community members.

Indicator 2 - Describe each project activity with expected climate, community and biodiversity impacts and its relevance to achieving the project's objectives.	The fully implemented project activities for both projects include: • **NEW** Sagalla Conservation and

	Development Forum (SCDF), Mwatate District Stakeholders' Forum (MDSF) and Mwachabo Development Forum (MDF) – community development. • Organic Greenhouses – provides trees, employment and local research into growing techniques. • Financial Aid to Marungu Hill Conservancy Association • Jojoba propagation & extension into the Community – new crop and potentially new source of income for local farmers. • Reforestation of Mt. Kasigau • Wildlife Works REDD Forest and Biodiversity monitoring • Community Wildlife Scouts • Kasigau Development Trust • REDD Carbon Inventory Monitoring • Ecotourism Projects • School Construction and Bursary Scheme • Group Ranch Office Renovations / Construction • Wildlife Works Eco-Charcoal Production Facility for the Kasigau Corridor REDD Project • Wildlife Works/Tsavo Soap Factory – local employment • Wildlife Works REDD Project Product Sales and Marketing
Evidence Used to Assess Conformance:	Sections 2.2 in the phase I PIR, site visit, discussions with project staff and community leaders.
Findings:	All activities are operational and are functioning as described in the PD. This was confirmed during the site visit through interviews with staff.

Indicator 3 - Provide a map identifying the project location and boundaries of the project area(s), where the project activities will occur, of the project zone and of	Maps of the project areas and zones are provided in the PDD and PIR.

additional surrounding locations that are predicted to be impacted by project activities (e.g. through leakage).	
Evidence Used to Assess Conformance:	Sections 1.2 of the PIR.
Findings:	This indicator was adequately addressed during project validation, reconfirmed during verification through spot checking the project boundaries using a GPS.

Indicator 4 - Define the project lifetime and GHG accounting period and explain and justify any differences between them. Define an implementation schedule, indicating key dates and milestones in the project's development.	Phase I have a lifetime of 30 years. The start date for phase I was January 1, 2005, and it will end on December 31, 2035. Implementation schedules are provided.
Evidence Used to Assess Conformance:	Sections 1.5 and 1.6 of both PIR
Findings:	Indicator is adequately addressed and stated in the PDD

Indicator 5 - Identify likely natural and human-induced risks to the expected climate, community and biodiversity benefits during the project lifetime and outline measures adopted to mitigate these risks.	The following risks are mentioned in the PIR: • Change in legislation – deemed unlikely. • Carbon market revenues fail to sustain project – sustainability modeled conservatively with low offset values to mitigate. • Crop failure – a likely possibility that all the project's alternative economic development efforts were designed to mitigate. • Invasion of cattle grazers due to famine or lack of grazing – possible, but less likely as the area is becoming increasingly arid. Carbon funding supports ranger patrols to protect from illegal grazing. • Drought – likely, stresses wildlife and crops. Emergency water sources will be provided for wildlife. Crop diversity may mitigate effect on cash crops (especially if/when jojoba growing becomes widespread). • Fire – always possible. Continue educating local population on dangers of burning to

	improve grazing.
Evidence Used to Assess Conformance:	Sections 2.3 of the phase I PIR, discussions with Rob Dobson.
Findings:	This indicator is addressed. Staff has adequately assessed risks and offer reasonable methods to address them. This was assessed while on site through interviews with community members and project staff.

Indicator 6 - Demonstrate that the project design includes specific measures to ensure the maintenance or enhancement of the high conservation value attributes identified in G1 consistent with the precautionary principle.	The point of the project is to maintain HCVs within the project area and zone, and does so through: • Security enhancement (project ranger force, ranger outposts, KWS collaboration, cooperation with other conservationists. • Habitat enhancement. • Community engagement. • Biodiversity and social monitoring.
Evidence Used to Assess Conformance:	Section 2.2.5 of the phase I PIR, interview with Dr. Mwangi Githiru.
Findings:	Indicator G3.6 is adequately addressed at validation and confirmed during verification through direct observations and interviews with project staff.

Indicator 7 - Describe the measures that will be taken to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime.	One of the main thrusts of the project is to provide sustainable jobs and income generating activities that will last beyond the project lifetime. The clothing factory is already self-sustaining. Locals are now familiar with the idea that healthy wildlife populations and forest lands with sustainable income opportunities. Educational opportunities through the bursary system will also likely produce additional community benefits.
Evidence Used to Assess Conformance:	Sections 2.3 of the Phase I PIR, discussions with Rob Dobson.
Findings:	Indicator 3.7 is satisfactorily addressed at validation and confirmed during this verification through direct observations and interviews with project staff.

Indicator 8 - Document and defend how communities and other stakeholders potentially affected by the project activities have been identified and have been involved in	Community stakeholders have been informed of activities by the project developer since its inception, even though it was not necessary to do so. The MR/PIR for each phase of the project was made

project design through effective consultation, particularly with a view to optimizing community and stakeholder benefits, respecting local customs and values and maintaining high conservation values. Project developers must document stakeholder dialogues and indicate if and how the project proposal was revised based on such input. A plan must be developed to continue communication and consultation between project managers and all community groups about the project and its impacts to facilitate adaptive management throughout the life of the project.	available on the CCBA website and the carbon offices at Rukinga. Additionally, they were also made available in the communities involved in each phase. The project developer formalized a community conflict process. Most resolution processes typically involve mediation by a local administrative chief. In addition, due to a clarification request during the last verification, the Monitoring report included the following language: In future, we will enhance the grievance airing mechanism at Wildlife Works in two ways. First, in order to ensure that all stakeholders in the project area know and understand about Wildlife Works' open-door policy, we shall (i) hold quarterly Locational barazas specifically for providing project updates and providing a forum for airing grievances, and (ii) have a permanent insert into our quarterly Newsletter informing the readers of this policy and various avenues of airing grievances. In addition, besides being able to air grievances through the Locational barazas or through the Community Liaison or Carbon Offices, we are in the process of establishing Suggestion Boxes at the Chief's offices in the five locations for persons wishing to remain anonymous. We shall establish an inclusive and transparent mechanism for opening and dealing with any complaints dropped in the boxes. Lastly, Notice Boards are also in the process of being put up at the Chief's Offices where project updates shall be regularly posted for the entire community's access, because all have free access to the Chief's Office.
Evidence Used to Assess Conformance:	Section 2.7 of the PIR, site visit, where suggestion boxes and community bulletin boards were seen, and discussions with staff.
Findings:	This indicator was adequately addressed during this verification through interviews with community members and staff.

Indicator 9 - Describe what specific steps have been taken, and communications methods used, to	The PIR were in their 30 day comment periods during this verification, and are available on the CCBA website, in the Wildlife Works office, and at

publicize the CCBA public comment period to communities and other stakeholders and to facilitate their submission of comments to CCBA. Project proponents must play an active role in distributing key project documents to affected communities and stakeholders and hold widely publicized information meetings in relevant local or regional languages.	local chiefs' offices in the communities (in hardcopy form). The availability of the PIR and the comment period was announced at barazas, and posted on community bulletin boards throughout the surrounding communities. Given the landscape and remoteness of communities surrounding the project area, this was considered to be an adequate and appropriate method.
Evidence Used to Assess Conformance:	Sections 2.7 of the Phase I PIR, and site visit.
Findings:	The PIR has been made available to the public and stakeholders. Typo in describing 30 day period.
Non-Conformance Report (NCR) to address non-conformance:	Phase I PIR includes a typo, stating that the 30 day comment period is February 1, 2013 to February 28, 2013. Please correct and ensure the PIR is available for a full 30 day period.
Date issued	February 25, 2013
Project proponent response/actions and date	NCR Accepted and Implemented The dates for the Public comment period in the MR/PIR documents have been updated for Phase I . The MR/PIR documents for both Projects were posted for comment on the CCBA website from January 25th until February 24th, 2013. They were also available at the main project office in the Rukinga Sanctuary for public review by project stakeholders and community members. Files accompanying this CL to be supplied to the validator: -'Kasigau Corridor Phase I_VCS CCB Monitoring & Implementation Report _v2.docx'
Evidence used to close NCR:	PIR have been revised, as explained above and were found to be adequately corrected.
Date closed	22 March 2013

Indicator 10 - Formalize a clear process for handling unresolved conflicts and grievances that arise during project planning and implementation. The project design	Wildlife Works has quarterly community meetings, called barazas, where community members can air grievances. The WW office also has an open-door policy. In addition, communities have suggestion boxes for those who prefer to remain anonymous.

must include a process for hearing, responding to and resolving community and other stakeholder grievances within a reasonable time period. This grievance process must be publicized to communities and other stakeholders and must be managed by a third party or mediator to prevent any conflict of interest. Project management must attempt to resolve all reasonable grievances raised, and provide a written response to grievances within 30 days. Grievances and project responses must be documented.	The process is publicized by the Wildlife Works community liaison office through local chiefs and posted on community bulletin boards. Written responses to grievances are provided within 30 days. The process is managed by the local administrative chief, who also serves as the third party mediator. .
Evidence Used to Assess Conformance:	Sections 2.7 of the PIR, document "Wildlife Works Community Conflict Process" and site visit interviews.
Findings:	Adequate mechanisms for resolving conflicts and grievances with WW and project activities are in place. In conversations with staff, it was learned that no negative comments or grievances were ever received.
Non-conformance Report (NCR):	Within the PIR, please state whether grievances or conflicts have arisen since the last verification. (If so, how were they addressed?)
Date issued	25 February 2013
Project proponent response/actions and date	NCR Accepted and Implemented There were no major conflicts or grievances reported to Wildlife Works by Project Stakeholders or community members since the last verification in Phase I Project. Wildlife Works has a strong relationship with most of the Projects' Stakeholders and the surrounding communities. We work hard to ensure that their interests are protected and rights upheld. We are constantly evaluating our policies so that their voice is heard and any concerns will be addressed and resolved quickly. The MR/PIR document for both Phase I projects have been updated to state this. Files accompanying this CL to be supplied to the

	validator: -'Kasigau Corridor Phase I_VCS CCB Monitoring & Implementation Report _v2.docx'
Evidence used to close NCR	Revised PIR now contain the requested additions.
Date closed	22 March 2013

Indicator 11 - Demonstrate that financial mechanisms adopted, including projected revenues from emissions reductions and other sources, are likely to provide an adequate flow of funds for project implementation and to achieve the anticipated climate, community and biodiversity benefits.	The project developer's track record, thus far, indicate that they are likely to continue to fund the project in the foreseeable future. The clothing factory is already self-sustaining and continues to grow and has attracted another company in the EPZ.
Evidence Used to Assess Conformance:	Sections 2.5 of the PIR, discussions with Rob Dobson and Paschal Mulonzya, profits and loss statement and projections.
Findings:	Indicator G3.11 is adequately addressed given the financial information that was reviewed and complemented by the discussion with the project accountant.

Section G4 Management Capacity and Best Practices

Indicator 1 - Identify a single project proponent which is responsible for the project's design and implementation. If multiple organizations or individuals are involved in the project's development and implementation the governance structure, roles and responsibilities of each of the organizations or individuals involved must also be described.	The project proponent is Mike Korchinsky. In addition, other important individuals in the project's governance and implementation are: Rob Dobson, VP of African Field Ops Jeremy T Freund, VP Carbon Development. Paschal Mulonzya, company accountant. Daniel Munyao, sewing factory manager. Lenjo Laurian, office manager and community relations. Dr. Mwangi Githiru, Director of biodiversity and social monitoring. Joseph Mwanganda, Jojoba project manager. Eric Sagwe, head wildlife ranger.
Evidence Used to Assess Conformance:	Sections 1.3 and 1.4 of the PIR and site visit.
Findings:	Indicator G4.1 is adequately addressed during validation and verifiers confirmed nothing has changed at the time of verification.

Indicator 2 - Document key technical skills that will be required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills. Document the management team's expertise and prior experience implementing land management projects at the scale of this project. If relevant experience is lacking, the proponents must either demonstrate how other organizations will be partnered with to support the project or have a recruitment strategy to fill the gaps.	The project proponent and project staff have the necessary skills to carry out this project, including: • management skills and experience • GIS and remote sensing • Accounting • Factory management • Agronomists • Forestry professionals • Wildlife professionals • Security professionals Many of the key management staff have been with the project since the beginning. Mentoring and training of employees was found to be a well-integrated part of the Wildlife Works culture.
Evidence Used to Assess Conformance:	Sections 1.3 and 1.4 of the PIR, interviews with staff during site visit.
Findings:	This indicator was adequately addressed during project validation and reconfirmed during verification through interviews and direct observation with project staff.

Indicator 3 - Include a plan to provide orientation and training for the project's employees and relevant people from the communities with an objective of building locally useful skills and knowledge to increase local participation in project implementation. These capacity building efforts should target a wide range of people in the communities, including minority and underrepresented groups. Identify how training will be passed on to new workers when there is staff turnover, so that local capacity will not be lost.	The project proponent has provided extensive training to many of the project employees, including sewing factory workers, wildlife rangers, greenhouse workers and forest inventory teams. The company accountant has been training CBO employees in auditing and accounting. A number of the project employees began in entry level positions and worked their way up, receiving training along the way.
Evidence Used to Assess Conformance:	Sections 2.6 of the PIR, interviews with staff and employees.
Findings:	Indicator G4.3 has been adequately addressed as confirmed through the interviews with project staff and employees.

Indicator 4 - Show that people from the communities will be given an equal opportunity to fill all employment positions (including management) if the job requirements are met. Project proponents must explain how employees will be selected for positions and where relevant, must indicate how local community members, including women and other potentially underrepresented groups, will be given a fair chance to fill positions for which they can be trained.	The project staff includes several local people who worked their way up to management positions, including Eric Sagwe and Laurian Lenzo. Other employees explained their intentions of proving themselves, and then working their way up to higher paying/better positions. All interviewed employees described employment through the project proponent's activities to be considered better than other jobs typically available in the area.
Evidence Used to Assess Conformance:	Several interviews with local staff and project management were conducted with specific questions related to this item were discussed.
Findings:	Indicator G4.4 has been adequately addressed and confirmed during the site visit.

Indicator 5 - Submit a list of all relevant laws and regulations covering worker's rights in the host country. Describe how the project will inform workers about their rights. Provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved.	The PIR cover the hazards of the various work duties of employees and precautions/training that is used to prevent or lessen the likelihood of injuries in section 2.6.
Evidence Used to Assess Conformance:	Sections 2.6 of the PIR, Review of PUMA Safe Social and environmental manuals.
Findings:	Indicator G4.5 has been adequately addressed during validation. At this time of verification, this item was found to have not changed since the validation and previous verification effort.

Indicator 6 - Comprehensively assess situations and occupations that pose a substantial risk to worker safety. A plan must be in place to inform workers of risks and to	Sections 2.6 of the PIR list the hazards faced by clothing factory employees, greenhouse employees, wildlife rangers and soap factory employees, as well as a brief explanation of training to mitigate hazards. Training manuals, as well as PUMA Safe manuals

explain how to minimize such risks. Where worker safety cannot be guaranteed, project proponents must show how the risks will be minimized using best work practices.	were provided. Since the sewing and printing factories have contracts with PUMA, they must abide by PUMA's social and safety guidelines.
Evidence Used to Assess Conformance:	Sections 2.6 of the PIR, employee training manual, PUMA Safe social and environmental manuals.
Findings:	Indicator G4.6 has been largely addressed. However, the tables titled "Overall Project Incidents" on pages 96 – 97 of the Phase I, presumably the death of the wildlife ranger described during the site visit.
Non-Conformance Report (NCR):	While we sincerely regret your loss of the ranger, will this initiate any changes to be made in training practices for employee safety? Additionally, under Employee Safety in sections 2.6 of the PIR, it is stated that there were no fatalities in the past 10 years. Please correct these passages to reflect the loss of the ranger.
Date Issued:	25 February 2013
Project proponent response/actions and date:	NCR Accepted and Implemented Wildlife Works was shocked and saddened by the death of Abdulai Mohammed, a Wildlife Works Ranger. An analysis of the incident found it to be caused by an ambush from poachers, and not by any actions that our Rangers took. Therefore, the existing training has not been altered in response. However, the Rangers have been provided with improved field medical equipment kits as well as new expert field-based medical training, which will provide better tools in any potential future incidents. The health and safety of our staff is our greatest concern. The Rangers are not to engage poachers or place themselves at risk in any way. The policy is to call the Kenya Wildlife Service agents in for any incident that has the potential to involve armed poachers. Our Rangers are unarmed by principle. We feel arming them with guns would only contribute to a violent culture, and endanger them further by making them targets to poachers. The MR/PIR document for Phase I project has been

	updated to reflect this tragic event. Files accompanying this CL to be supplied to the validator: -'Kasigau Corridor Phase I_VCS CCB Monitoring & Implementation Report _v2.docx'
Evidence used to close NCR:	Revised PIR contain the needed information and additional discussion that deems this indicator as addressed.
Date closed:	22 March 2013

Indicator 7 - Document the financial health of the implementing organization(s) to demonstrate that financial resources budgeted will be adequate to implement the project.	Financial records, project longevity, factory expansions and investment/contracts with outside entities (e.g. Puma, BOKO) indicate the project has adequate financial support.
Evidence Used to Assess Conformance:	Sections 2.5 of the PIR, profit and loss statement, interviews with staff, ranch stakeholders, community leaders, site visits to complete and work-in-progress projects.
Findings:	Indicator G4.7 has been adequately addressed through review of the evidence listed above.

G5 Legal Status and Property Rights

Indicator 1 - Submit a list of all relevant national and local laws and regulations in the host country and all applicable international treaties and agreements. Provide assurance that the project will comply with these and, where relevant, demonstrate how compliance is achieved.	The following list of relevant laws/regulations is provided: Export Processing Zone Act National Health Insurance Fund National Social Security Fund Act Pay As You Earn (Section 37 of income tax act) Factories and Other Places of Work Act Fair Trade Work Injury Benefits Act Regulation of Wages and Conditions of Employment Act Labor Relations Act
Evidence Used to Assess Conformance:	Sections 3.1 of the PIR, Fair Trade certification, passing PUMA Safe standards were all reviewed.
Findings:	Indicator G5.1 was adequately addressed at validation and verification confirms that this element has not changed.

Indicator 2 - Document that the	It is not common practice to register carbon

project has approval from the appropriate authorities, including the established formal and/or traditional authorities customarily required by the communities.	easements in Kenya at this time. Each landowner/shareholder in the participating community ranches has signed agreements with wildlife works.
Evidence Used to Assess Conformance:	Sections 3.2 of the PIR, inspection of the deeds and documents transferring carbon rights to project proponent during site visit.
Findings:	This indicator was adequately addressed during project validation, and was reconfirmed during this verification.

Indicator 3 - Demonstrate with documented consultations and agreements that the project will not encroach uninvited on private property, community property, or government property and has obtained the free, prior, and informed consent of those whose rights will be affected by the project.	The project takes place on private property with the full agreement and cooperation of owners. Minutes from ranch shareholder meetings and legal documents signed by all ranch shareholders were made available for inspection during the site visit.
Evidence Used to Assess Conformance:	Sections 3.7 of the PIR, sections G5.3 of the PDD, inspection of meeting minutes, legal documents and interviews with ranch shareholders and local chiefs.
Findings:	This indicator was adequately addressed during project validation, reconfirmed during this verification through direct review of the legal documents and meeting minutes as well as interviews with ranch shareholders.

Indicator 4 - Demonstrate that the project does not require the involuntary relocation of people or of the activities important for the livelihoods and culture of the communities. If any relocation of habitation or activities is undertaken within the terms of an agreement, the project proponents must demonstrate that the agreement was made with the free, prior, and informed consent of those concerned and includes provisions for just and fair	No one historically lives in the project area. Activities on these lands by local people are largely illegal (charcoal making and poaching). No people have been relocated as a result of this project.

compensation.	
Evidence Used to Assess Conformance:	Sections 3.7 of the PIR, section G5.4 of the PDD and site visit observations and interviews with local communities surrounding the project area.
Findings:	This indicator was adequately addressed during project validations and was reassessed during this verification through interviews with community members.

Indicator 5 - Identify any illegal activities that could affect the project's climate, community or biodiversity impacts (e.g., logging) taking place in the project zone and describe how the project will help to reduce these activities so that project benefits are not derived from illegal activities.	The main illegal activities that could affect the project include illegal charcoal production and poaching. Ranger patrols, eco-charcoal production and project-associated employment opportunities are designed to reduce and control these activities.
Evidence Used to Assess Conformance:	Sections 3.8 of the PIR, discussions with staff during the site visit, observations of eco-charcoal production activities, observations of old charcoal kilns, anti-poaching activities occurring during site visit.
Findings:	Indicator G5.5 has been adequately addressed following the review of the evidence listed above.

Indicator 6 - Demonstrate that the project proponents have clear, uncontested title to the carbon rights, or provide legal documentation demonstrating that the project is undertaken on behalf of the carbon owners with their full consent. Where local or national conditions preclude clear title to the carbon rights at the time of validation against the Standards, the project proponents must provide evidence that their ownership of carbon rights is likely to be established before they enter into any transactions concerning the project's carbon assets.	There is currently no practice of registering carbon easements against land title. However, the owners of each ranch in the project have signed conservation easements, granting carbon rights to the project developer for monitory and other considerations.
Evidence Used to Assess Conformance:	Sections 3.2 of the PIR, inspection of chains of title and easement agreements with two of the ranches

	(randomly chosen – Maungu and Wangala ranches), interviews with members of the board of directors on some of the ranches.
Findings:	Indicator 5.6 has been adequately addressed through interviews with project staff and representatives of the ranches.

CL1 Net Positive Climate Impacts

Indicator 1 - Estimate the net change in carbon stocks due to the project activities using the methods of calculation, formulae and default values of the IPCC 2006 GL for AFOLU or using a more robust and detailed methodology. The net change is equal to carbon stock changes *with* the project minus carbon stock changes *without* the project (the latter having been estimated in G2). This estimate must be based on clearly defined and defendable assumptions about how project activities will alter GHG emissions of carbon stocks over the duration of the project or the project GHG accounting period.	Project has undergone concurrent VCS verification which adequately covers the requirements of this indicator. The project has been previously validated and verified to the VCS Standard. As such the current effort is towards an annual verification of the project activities and monitoring calculations.
Evidence Used to Assess Conformance:	Sections CL1.1 of the PDD, sections 6.4 of the PIR.
Findings:	VCS verification of the 2012 Monitoring Period is approved and as such, this indicator and its requirements are considered to be adequately covered through that concurrent effort. Please see the 2012 project Monitoring Report for further information.

Indicator 2 - Estimate the net change in the emissions of non-CO_2 GHG emissions such as CH_4 and N_2O in the *with* and *without* project scenarios if those gases are likely to account for more than a 5% increase or decrease (in terms of CO_2-equivalent) of the project's overall GHG emissions reductions or removals over each monitoring period.	Project has undergone concurrent VCS verification which adequately covers the requirements of this indicator. The project has been previously validated and verified to the VCS Standard. As such the current effort is towards an annual verification of the project activities and monitoring calculations.

Evidence Used to Assess Conformance:	Sections CL1.2 of the PDD, sections 6.5 of the PIR.
Findings:	VCS verification of the 2012 Monitoring Period is approved and as such, this indicator and its requirements are considered to be adequately covered through that concurrent effort. Please see the 2012 project Monitoring Report for further information.

Indicator 3 - Estimate any other GHG emissions resulting from project activities. Emissions sources include, but are not limited to, emissions from biomass burning during site preparation, emissions from fossil fuel combustion, direct emissions from the use of synthetic fertilizers, and emissions from the decomposition of N-fixing species.	Project has undergone concurrent VCS verification which adequately covers the requirements of this indicator. The project has been previously validated and verified to the VCS Standard. As such the current effort is towards an annual verification of the project activities and monitoring calculations.
Evidence Used to Assess Conformance:	Sections CL1.3 of the PDD, sections 6.4 of the PIR.
Findings:	VCS verification of the 2012 Monitoring Period is approved and as such, this indicator and its requirements are considered to be adequately covered through that concurrent effort. Please see the 2012 project Monitoring Report for further information.

Indicator 4 - Demonstrate that the net climate impact of the project is positive. The net climate impact of the project is the net change in carbon stocks plus net change in non-CO_2 GHGs where appropriate minus any other GHG emissions resulting from project activities minus any likely project-related unmitigated negative offsite climate impacts (see CL2.3).	Project has undergone concurrent VCS verification which adequately covers the requirements of this indicator. The project has been previously validated and verified to the VCS Standard. As such the current effort is towards an annual verification of the project activities and monitoring calculations.
Evidence Used to Assess Conformance:	Sections CL1.4 of the PDD, sections 6.4 of the PIR.
Findings:	VCS verification of the 2012 Monitoring Period is approved and as such, this indicator and its requirements are considered to be adequately covered through that concurrent effort. Please see the 2012 project Monitoring Report for further information.

Indicator 5 - Specify how double counting of GHG emissions reductions or removals will be avoided, particularly for offsets sold on the voluntary market and generated in a country with an emissions cap.	Kenya has no national emissions cap and is unlikely to have one in the near future. The project developer is working with the government of Kenya as it formalizes a Jurisdictional Nested Approach program for carbon credits. The project is being registered with VCS.
Evidence Used to Assess Conformance:	Sections 3.3 and 3.4 of the PIR.
Findings:	Indicator CL1.5 has been adequately addressed through assessment of the statements made and interviews with project management and concurrent VCS verification.

CL2 Offsite Climate Impacts ("Leakage")

Indicator 1 - Determine the types of leakage that are expected and estimate potential offsite increases in GHGs (increases in emissions or decreases in sequestration) due to project activities. Where relevant, define and justify where leakage is most likely to take place.	No leakage is expected as a result of project activities. No commercial species of trees grow here, and consumption was for domestic fuel. Activity displacement is not an area of leakage, because activities potentially displaced were illegal (fuel gathering, farming, poaching).
Evidence Used to Assess Conformance:	Sections CL2.1 of the PDD, site visit interviews and project area tour. Direct observation of leakage sampling methods.
Findings:	Indicator CL2.1 was adequately addressed during project validation and reconfirmed during this verification through interviews with project ranger staff and direct observations of the project area and boundaries, as well as leakage monitoring process and plot locations.

Indicator 2 - Document how any leakage will be mitigated and estimate the extent to which such impacts will be reduced by these mitigation activities.	The project mitigates leakage by providing alternative employment for local people, cleared land that can be used for agriculture, and an ecologically friendly charcoal producing method is being developed.
Evidence Used to Assess Conformance:	Sections 2.2.11 – 2.2.13 of the PIR, sections CL2.2 of the PDD, site visit.
Findings:	Indicator CL2.2 was adequately addressed during project validation and reconfirmed during this

	verification through observation of the various economic incentive operations implemented by the project. Further, direct interviews with community members confirmed this indicator as being addressed.

Indicator 3 - Subtract any likely project-related unmitigated negative offsite climate impacts from the climate benefits being claimed by the project and demonstrate that this has been included in the evaluation of net climate impact of the project (as calculated in CL1.4).	Project has undergone concurrent VCS verification which adequately covers the requirements of this indicator. The project has been previously validated and verified to the VCS Standard. As such the current effort is towards an annual verification of the project activities and monitoring calculations.
Evidence Used to Assess Conformance:	Sections 6.3 of the PIR.
Findings:	VCS verification of the 2012 Monitoring Period is approved and as such, this indicator and its requirements are considered to be adequately covered through that concurrent effort. Please see the 2012 project Monitoring Report for further information.

Indicator 4 - Non-CO_2 gases must be included if they are likely to account for more than a 5% increase or decrease (in terms of CO_2-equivalent) of the net change calculations (above) of the project's overall off-site GHG emissions reductions or removals over each monitoring period.	Non CO2 GHGs amount to far less than 5% of total emissions, and are therefore not accounted for.
Evidence Used to Assess Conformance:	Sections CL2.4 of the Phase I PDD.
Findings:	Indicator CL2.4 was adequately addressed during project validation and currently through verification of VCS project documents and calculations.

CL3 Climate Impact Monitoring

Indicator 1 - Develop an initial plan for selecting carbon pools and non-CO_2 GHGs to be monitored, and determine the frequency of monitoring. Potential pools include aboveground biomass, litter, dead wood, belowground biomass, wood	Project activities, including the monitoring plan are in place and in progress. The project has previously been validated.

products, soil carbon and peat. Pools to monitor must include any pools expected to decrease as a result of project activities, including those in the region outside the project boundaries resulting from all types of leakage identified in CL2. A plan must be in place to continue leakage monitoring for at least five years after all activity displacement or other leakage causing activity has taken place. Individual GHG sources may be considered 'insignificant' and do not have to be accounted for if together such omitted decreases in carbon pools and increases in GHG emissions amount to less than 5% of the total CO_2-equivalent benefits generated by the project. Non-CO_2 gases must be included if they are likely to account for more than 5% (in terms of CO_2-equivalent) of the project's overall GHG impact over each monitoring period. Direct field measurements using scientifically robust sampling must be used to measure more significant elements of the project's carbon stocks. Other data must be suitable to the project site and specific forest type.	
Evidence Used to Assess Conformance:	Sections 5.1 of the PIR, sections CL3.1 of the PDD.
Findings:	VCS verification of the 2012 Monitoring Period is approved and as such, this indicator and its requirements are considered to be adequately covered through that concurrent effort. Please see the 2012 project Monitoring Report and calculations for further information.

Indicator 2 - Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to	The plan is in place and is being implemented. PIR have been made available in the local area and on the CCBA website.

disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.	
Evidence Used to Assess Conformance:	PIR, confirmed posting on website, confirmed copies available at project carbon offices and chiefs' offices.
Findings:	This indicator was adequately covered during project validation and reconfirmed during verification.

CM1 Net Positive Community Impacts

Indicator 1 - Use appropriate methodologies to estimate the impacts on communities, including all constituent socio-economic or cultural groups such as indigenous peoples (defined in G1), resulting from planned project activities. A credible estimate of impacts must include changes in community well-being due to project activities and an evaluation of the impacts by the affected groups. This estimate must be based on clearly defined and defendable assumptions about how project activities will alter social and economic well-being, including potential impacts of changes in natural resources and ecosystem services identified as important by the communities (including water and soil resources), over the duration of the project. The 'with project' scenario must then be compared with the 'without project' scenario of social and economic well-being in the absence of the project (completed in G2). The difference (i.e., the community benefit) must be positive for all community groups.	The whole intent of the project is to bring benefits to the communities through the conservation of natural resources. The monitoring plan includes tracking numbers of people employed from local communities, funds invested in communities and socio-economic improvement in the communities
Evidence Used to Assess Conformance:	Sections 7.1 of the PIR, biodiversity and social monitoring report of October 2011 – December 2012.
Findings:	Indicator CM1.1 has been adequately addressed following previous validation of the project and

	currently assessed during verification for implementation of this plan.

Indicator 2 - Demonstrate that no High Conservation Values identified in G1.8.4-6 will be negatively affected by the project.	No negative impacts on HCVs are expected. The area continues to be used as a wildlife corridor for HCVs in the project zone, and the biodiversity monitoring program is in place to detect problems, should they arise.
Evidence Used to Assess Conformance:	Sections 7.1 of the PIR, biodiversity monitoring report, discussions with project staff and through direct observations gained during the site visit.
Findings:	This indicator was adequately addressed during project validation and confirmed during this verification.

CM2 Offsite Stakeholder Impacts

Indicator 1 - Identify any potential negative offsite stakeholder impacts that the project activities are likely to cause.	Potential offsite stakeholder impacts include: • an increase in human wildlife conflicts • excessive dependence on Wildlife Works for livelihood • A need for additional grazing land once cattle are excluded from Rukinga. • Alternative farmland for the Duruma community.
Evidence Used to Assess Conformance:	Sections 7.2 of the PIR, site visit, interviews and discussions with stakeholders.
Findings:	Indicator CM2.1 has been adequately addressed and conditions were confirmed during this verification.

Indicator 2 - Describe how the project plans to mitigate these negative offsite social and economic impacts.	The following steps and points were noted: • Better habitat on Rukinga and neighboring ranches mean less reason for wildlife to stray into communities and farms • Ranger patrols • Free chili pepper bushes and chili pepper derived sprays to repel wildlife. • Many members of the community now have jobs through tourism because of the increase in wildlife. • No indication that employment with project developer/project businesses has harmed other employment sources. • Grazing is unsuited to the area, as evidenced

	by the fact that grazing is not a traditional livelihood for locals. • The Duruma have been helped by employment, and have been offered low cost land for purchase. The project developer does not think that the Duruma's search for farmland well outside their traditional homeland is their responsibility, however. This is an illegal land grab, unrelated to project activities.
Evidence Used to Assess Conformance:	Sections 7.2 of the PIR, site visit and interviews.
Findings:	Project plans and actions result in this indicator CM2.2 being adequately addressed.

Indicator 3 - Demonstrate that the project is not likely to result in net negative impacts on the well-being of other stakeholder groups.	The project activities are highly unlikely to result in any net negative impacts on local stakeholders. A robust community monitoring plan is being implemented.
Evidence Used to Assess Conformance:	Sections 7.2, 5.1 and 2.2 of the PIR, interviews with local people during site visit.
Findings:	This indicator was adequately addressed during project validation, and was reconfirmed during this verification. Community monitoring plan was found to have been adequately planned and implemented. Further, this project area is private land that is largely not used by any outside stakeholders other than sanctioned activities such as cattle grazing.

CM3 Community Impact Monitoring

Indicator 1 - Develop an initial plan for selecting community variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project's community development objectives and to anticipated impacts (positive and negative).	The project developer has a social/community monitoring plan in place, including: • household surveys • charcoal producers surveys • Amara radio survey • Community liaison summaries • Education (bursaries and infrastructure) • Education (performance) • Health issues • Water issues
Evidence Used to Assess Conformance:	Sections 2.2 of the PIR, biodiversity and social report, discussions with Dr. Mwangi Mithiru.

Findings:	Indicator CM3.1 has been adequately addressed previously through development of the initial plan at validation.

Indicator 2 - Develop an initial plan for how they will assess the effectiveness of measures used to maintain or enhance High Conservation Values related to community well-being (G1.8.4-6) present in the project zone.	The monitoring plan has been developed and is being implemented as per the original project description.
Evidence Used to Assess Conformance:	Sections 2.2 of the PIR, Biodiversity and Social Report, discussions with Dr. Mwangi Mithiru.
Findings:	Indicator CM3.2 has been adequately addressed during the previous validation and was confirmed to be in continuance during this verification.

Indicator 3 - Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.	The community and biodiversity monitoring plan and report was made available in local community chiefs' offices, and on the CCB website.
Evidence Used to Assess Conformance:	Site visit and discussion with project management staff.
Findings:	Indicator CM3.3 has been adequately addressed. A full monitoring plan was developed previous to this verification. This plan was assessed and deemed to be addressed through interviews with community members.

B1 Net Positive Biodiversity Impacts

Indicator 1 - Use appropriate methodologies to estimate changes in biodiversity as a result of the project in the project zone and in the project lifetime. This estimate must be based on clearly defined and defendable assumptions. The 'with project'	A biodiversity monitoring plan is in place, using: • road transects • ranger and community scout transects • habitat monitoring • community monitoring

scenario should then be compared with the baseline 'without project' biodiversity scenario completed in G2. The difference (i.e., the net biodiversity benefit) must be positive.	
Evidence Used to Assess Conformance:	Sections 8.1 of the PIR, discussion with Dr. Mwangi Mithiru, Biodiversity and Social Report: October 2011 – December 2012.
Findings:	This indicator was adequately addressed during project validation and confirmed again during this verification. Subsequent biodiversity monitoring has indicated an increase in biodiversity and wildlife populations since the inception of the project.

Indicator 2 - Demonstrate that no High Conservation Values identified in G1.8.1-3 will be negatively affected by the project.	The project is designed to protect and enhance HCVs, and early biodiversity monitoring reports indicate this design is successful.
Evidence Used to Assess Conformance:	Sections 8.1 of the PIR, Biodiversity and Social Monitoring Report, discussions with management, rangers, and Dr. Mwangi Mithiru.
Findings:	Indicator B1.2 has been adequately addressed through consideration of the project type and activities, as well as direct observation while on site and discussions with the project biologist and rangers.

Indicator 3 - Identify all species to be used by the project and show that no known invasive species will be introduced into any area affected by the project and that the population of any invasive species will not increase as a result of the project.	Species to be used in the project include the following categories and species. Indigenous trees: 1. Mkwachu Tamarindus indica 2. Kirumbutu Melia Volkensii 3. Mchemeri Acacia nilotica (Egyptian Thorn) 4. Acacia Robusta 5. Kiburabura (swa) Prunus africana 6. Mshogoreka Terminalia brownii 7. Iti Acacia tortilis 8. Chariso Boscia coriacea 9. Mzwana Berchemia discolor 10. Mbokoi Melita Oblata 11. Mwarara(swa) Acacia brevispica (Wait

	a bit) 12. Kikwata Acacia melifera 13. Gum arabica Acacia arabica 14. Mwasina Kigelia africana 15. Umbrella Thorn Acacia abyssinica 16. Mshigha Lannea schweinfurthii 17. Mhina Lawsonia inermis 18. Mlamba Adansonia digitata Non-native species: 1. Simmondsia chinensis (Jojoba) 2. Morabaini, Neem Azadirachta indica 3. Moringa Moringa oleifera 4. chili-pepper Capsicum chinense 5. mango Mangifera Indica 6. orange (pixie, mineola, Washington navel etc.) Citrus sinensis var. grafted onto Citrus jambhiri Lush. (rough lemon) rootstock 7. Papaya Carica papaya 8. Passion Fruit Passiflora edulis SIMS
Evidence Used to Assess Conformance:	Sections 8.1 of the PIR, site visit, and research related to these species listed.
Findings:	Indicator B1.3 has been adequately addressed following the site visit observations and independent verification of the species used and their application on the project.

Indicator 4 - Describe possible adverse effects of non-native species used by the project on the region's environment, including impacts on native species and disease introduction or facilitation. Project proponents must justify any use of non-native species over native species	No non-native invasive species are used by the project.
Evidence Used to Assess Conformance:	Global invasive species database, sections 8.1 of the PIR.
Findings:	Indicator B1.4 has been adequately addressed following the site visit observations and independent verification of the species used and their application on the project.

Indicator 5 - Guarantee that no GMOs will be used to generate GHG emissions reductions or removals.	The guarantee was made in the original PDD, as well as sections 8.1 of the PIR.
Evidence Used to Assess Conformance:	Sections 8.1 of the PIR.
Findings:	Indicator B1.5 has been adequately addressed.

B2 Offsite Biodiversity Impacts

Indicator 1 - Identify potential negative offsite biodiversity impacts that the project is likely to cause.	Given that this project is based around protecting a native, primary forest, there are no offsite impacts expected.
Evidence Used to Assess Conformance:	Sections 8.2 of the PIR, the basic premise and design of the project.
Findings:	Indicator B2.1 has been adequately addressed.

Indicator 2 - Document how the project plans to mitigate these negative offsite biodiversity impacts.	Not applicable.
Evidence Used to Assess Conformance:	Section 8.2 of the PIR
Findings:	Indicator B2.2 has been adequately addressed.

Indicator 3 - Evaluate likely unmitigated negative offsite biodiversity impacts against the biodiversity benefits of the project within the project boundaries. Justify and demonstrate that the net effect of the project on biodiversity is positive.	Not applicable.
Evidence Used to Assess Conformance:	Sections 8.2 and 5.1 of the PIR, basic premise and design of the project.
Findings:	Indicator B2.3 has been adequately addressed.

B3 Biodiversity Impact Monitoring

Indicator 1 - Develop an initial plan for selecting biodiversity variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project's biodiversity objectives and to anticipated impacts	A plan has been developed and has been enacted.

(positive and negative).	
Evidence Used to Assess Conformance:	Sections 2.2 and 5.1 of the PIR, Biodiversity and Social Report, BSMT_Datasets file, discussions with Dr. Mwangi Githiru.
Findings:	Indicator B3.1 was adequately addressed during validation and was confirmed during this verification effort through interviews with project staff and direct observation of project activities and monitoring efforts.

Indicator 2 - Develop an initial plan for assessing the effectiveness of measures used to maintain or enhance High Conservation Values related to globally, regionally or nationally significant biodiversity (G1.8.1-3) present in the project zone.	A plan has been developed previously and has been enacted.
Evidence Used to Assess Conformance:	Section 2.2 of the PIR, Biodiversity and Social Report, discussions with Dr. Mwangi Githiru.
Findings:	Indicator B3.2 was adequately addressed during validation and was confirmed during this verification effort through interviews with project staff and direct observation of project activities and monitoring efforts.

Indicator 3 - Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.	Biological monitoring plan has already been developed and enacted.
Evidence Used to Assess Conformance:	Sections 2.2 of the PIR, Biodiversity and Monitoring Report, discussion with Dr. Mwangi Githiru.
Findings:	Indicator B3.3 has been adequately addressed. Given that this is the 3rd verification for this project, this element was previously validated. At this time of the 3rd verification, this plan was found through interviews with the project biologist to have been developed and implemented in accordance with this

	indicator.

Gold Level Section

GL1 Climate Change Adaptation Benefits

Indicator 1 - Identify likely regional climate change and climate variability scenarios and impacts, using available studies, and identify potential changes in the local land-use scenario due to these climate change scenarios in the absence of the project.	Impacts will almost certainly include diminished and less predictable rainfall patters, which are already in evidence. In the baseline scenario, this will lead to increased clearing and cultivation of marginal lands. Crop failures will lead to increased bush meat poaching.
Evidence Used to Assess Conformance:	Sections 6.5 of the PIR, discussion with Joseph Mwanganda (extension agent), World Bank report: The Economic Impact of Climate Change On Kenyan Crop Agriculture.
Findings:	Indicator GL1.1 was adequately addressed at validation and was confirmed to be addressed at verification.

Indicator 2 - Identify any risks to the project's climate, community and biodiversity benefits resulting from likely climate change and climate variability impacts and explain how these risks will be mitigated.	Risks include higher temperature, increased drought and the concurrent crop failures, lowering food availability. Natural food sources may also diminish, causing more wildlife/human encounters. These risks would likely increase land clearing and bush meat poaching. The project seeks to mitigate these impacts by providing new drought tolerant crops (jojoba), diversity in employment opportunities, and maintaining drought tolerant natural species of the forest. The project provides a lot more area for wildlife to migrate. Water holes are also supplied at places throughout the Rukinga sanctuary.
Evidence Used to Assess Conformance:	Sections 6.5 of the PIR, discussion with Rob Dodson.
Findings:	Indicator GL1.2 was adequately addressed at validation and was confirmed to be addressed at verification.

Indicator 3 - Demonstrate that current or anticipated climate changes are having or are likely to have an impact on the well-being of communities *and/or* the conservation status of biodiversity in the project zone and surrounding regions.	The current and anticipated climate changes described in GL1.1 and GL1.2 are also applicable to the project area and project zone.
Evidence Used to Assess Conformance:	Section 6.5 of the PIR, direct observations and interviews with project staff, independent knowledge and common knowledge that climate change will affect all humans in potentially negative ways.
Findings:	Indicator GL1.3 was adequately addressed at validation and was confirmed to be addressed at verification.

Indicator 4 - Demonstrate that the project activities will assist communities[53] *and/or* biodiversity to adapt to the probable impacts of climate change.	The threat of the impacts of climate change on the land and people of the project area/zone is what the project is designed to address. Alternative means of making a living have been provided and will continue to be provided. Non-land based jobs are growing. Dryland cropping methods and new crops are also being developed to better provide reliable crops to farmers.
Evidence Used to Assess Conformance:	Section 6.5 of the PIR, site visit and interviews.
Findings:	Indicator GL1.4 has been adequately addressed. This is evidenced by the project activity of preserving a primary, native forest. The very premise behind the project is one of preservation of the native landscape which has adapted over time to be resilient. Were this forest be allowed to be converted to an alternative land use, that resiliency would be lost.

GL3 Exceptional Biodiversity Benefits

Indicator 1 – Vulnerability Regular occurrence of a globally threatened species (according to the IUCN Red List) at the site: 1.1 - Critically Endangered (CR) and Endangered (EN) species - presence of at least a single individual; or	The project zone meet the criteria under vulnerability for the following reasons: • Rukinga and Taita have a resident population of Grevy's zebra (IUCN Red List – endangered) • Project area includes part of the home range of a pack of African Hunting Dogs (IUCN

1.2 - Vulnerable species (VU) - presence of at least 30 individuals or 10 pairs.	Red List – endangered). • Project area has significant population of cheetah and lion (IUCN Red List – Vulnerable). • Project zone includes Taita Apalis and the Taita Thrush, both IUCN Red List – critically endangered.
Evidence Used to Assess Conformance:	Sections 8.3 of the PIR, biodiversity monitoring report, discussions with Rob Dodson, Dr. Mwangi Githiru and Eric Segwe.
Findings:	Indicator GL3.1 is adequately addressed through interviews with project biologist and evaluation of the monitoring plan and report.

Public Shareholder Comments

Public comments for CCBA were solicited in two ways. Posting of the PDD and Project Implementation Report to the CCBA website and hardcopies were made available at the carbon offices in Rukinga, as well as the chiefs offices in the surrounding communities. The availability of the PIR and the duration of the comment period was announced at local barazas by the Wildlife Works community liaison office, and notifications were posted on local community bulletin boards. This method was considered to be appropriate for the types of communities and remote nature of the region. Wildlife Works appears to be a well-known entity in the area who have a track record of having beneficial dealings with the community. Further, they have been operating in the project area for 10 years and have a very good sense of what is appropriate for public notification. No comments were received.

Public Comment Period

The Project Implementation Report was posted to the CCBA website for the formal 30-day public comment period (25 January 2013 to 24 February 2013). Again, no comments were received.

During the site visit, the following individuals were interviewed:

1. Jeremy Freund, Wildlife Works VP of Carbon Development.
2. Rob Dobson, Wildlife Works VP of African Field Ops.
3. Paschal Mulonzya, Wildlife Works Accountant
4. Daniel Munyao, Sewing Factory Manager
5. Lenjo Laurian, Wildlife Works Office Manager, Community Relations and Personnel
6. Mwangi Githiru, Director of Biodiversity and Social Monitoring.
7. Joseph Mwanganda, Agricultural Extension Agent.

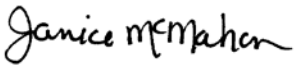
8. Simon Bird, Carbon Development Associate.
9. Eric Sagwe, Wildlife Works Head Wildlife Ranger.
10. Jamie Hendriksen, Carbon Operations Manager.
11. Cara Braund, Conservation Office Manager.
12. Christina Ender, Strategic REDD+ Policy Advisor.
13. Liesl Smit, Local Production Supervisor.
14. Lobakite Lekarikei, a Wildlife Works ranger
15. George (last name withheld by ranger) a Kenya Wildlife Service ranger.
16. Steve Mwaisaka, (Kasigau Development Trust) CBO manager
17. Chief Pascal Kizaka, Chief of the Kasigau location.
18. Doreen Getti, Project coordinator of Meringa Hills Conservancey (a CBO)
19. Elija Mnjau, former headmaster of Marungu Secondary School.
20. Esther Mbau, bursary representative.
21. Nicholas Nyambu Mwandime, Board of Directors of Rakinga Ranch and Area Counselor of Mwand Kishamba.
22. Reuben Mwaluma, Chairman of the Board of Directors for Maungu Ranch.
23. Harry Njai Mwanjari, Treasurer and member of the Board of Directors of Kambanga Ranch.
24. Anderson Mombo, Chairman of the Board of Directors of Kambanga Ranch.
25. Renson Dio, Taita Ranch Director.
26. Allan Kiplrmo, printing shop employee.
27. Paul Makau, workshop employee.
28. Alfred Mwachaka, workshop employee.
29. Catherine Mazenge, clothing factory employee
30. Constance (did not give last name) clothing factory employee
31. Mwuachofi Antony, organic greenhouse employee.
32. Eunic Habibu, organic greenhouse employee.

The interviewees provided overwhelmingly positive feedback about the project in regard to community and other stakeholder benefits, employment opportunities and the relative quality of employment through Wildlife Works. During time spent traveling to and through local communities for some of these interviews, warm relations between Wildlife Works personnel and community members was clearly evident.

Verification Conclusion

ESI confirms all validation and verification activities including objectives, scope and criteria, level of assurance and the PDD adherence/implementation to the CCB Standard, Second Edition as documented in this report are complete and concludes without any qualifications or limiting conditions that the CCB Project Implementation Reports *The Kasigau Corridor REDD Project Phase I – Rukinga Sanctuary 3rd Monitoring Report (M_3)* meets the requirements of the CCB Standards (Second Edition – December 2008).

Submittal Information

Report Submitted to:	Wildlife Works Carbon LLC 242 Redwood Hwy. Mill Valley, CA 94941 Climate, Community, and Biodiversity Alliance
Report Submitted (CCBA-Approved Verifier) by:	Environmental Services Inc. 7220 Financial Way, Suite 100 Jacksonville, Florida 32256
Lead Validator/Verifier and Regional Technical Manager (QA/QC) Names and Signatures:	 Shawn McMahon – Lead Validator/Verifier  Janice McMahon – Vice President and Regional Technical Manager Forestry, Carbon, and GHG Services Division
Date:	23 May 2013

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Appendix A – Documents Reviewed / Received

Documents received 28 November 2012

- The Kasigau Corridor Redd Project Phase I - Rukinga Sanctuary, 2nd Monitoring Report
- VCS Verification Report/Verification Statement, Kasigau Corridor REDD Project Phase I – Rukinga Sanctuary

Documents received 10 January 2013

- SOP Kasigau – Forest Inventory, v2.8
- SOP Kasigau – Leakage v1.0

Documents received 17 January 2013

- Excel file "Kasigau M=3 Sampled Plots.xlsx"
- Google Earth KMZ files:
    - Leakage_Plots.kmz
    - PhaseI_Plots_m=3.kmz
    - PhaseI ProjectArea.kmz

Documents received 22 January 2013

- Leakage_Plots.gpx
- Phase I_Plots_m3.gpx
- Phase I_ProjectArea.gpx

Documents received 24 January 2013

- Kasigau Corridor REDD Project Phase I – Rukinga Sanctuary 3rd Monitoring Report (M_3)

Documents Received 13 February 2013

- The following Excel files:
    - Kasigau Corridor Phase I QC Test M3 v1.xlsx
    - Leakage_Model_Expanded_fixed_PhaseI_v2.xls
- VCS Non-Permanence Risk Report Kasigau Phase I M_3 v1.

Documents Received 14 February 2013

- Kasigau Corridor Carbon Model Check.docx
- The following Excel files:
    - Leakage_Model_Expanded_fixed_PhaseI_v2.xls
    - Rukinga Carbon Model and NERs_M=3_v2.xlsm

Documents Received 20 February 2013

- Copy of conservation easement on Maungu Ranch
- The following Excel files:
  - Financials VCS Risk Analysis 2012 Kasigau.xlsx
  - Kasigau Project P&L M3.xls
  - Leakage_Model_Expanded_fixed_PhaseI_v2.xls

Documents Received 14 March 2013

- Kasigau_Phase 1 and 2_CCB NCRs Round 1_WWC RESPONSE v2.docx
- VCS Non-Permanence Risk Report Kasigau I_M3.v2.doc
- Kasigau Corridor Phase I_VCS CCB Monitoring & Implementation Report _v2.docx
- Kasigau Corridor Phase I_VCS CCB Monitoring & Implementation Report _v2.pdf
- Phase I\Kasigau Phase I Verification - Round 1 NCR's WWC v2.xlsx
- Leakage_Model_Expanded_fixed_PhaseI_v2.xls
- Rukinga Carbon Model and NERs_M=3_v3.xlsm
- Wildlife Works Market account_2013-02-27 at 11.42.12 AM.pdf
- Financials VCS Risk Analysis 2012 Kasigau with total sale amount added by ESI.xls
- Standard Operating Procedure Kasigau - Soil v1.0_5_24_2011.pdf
- Quality Control Procedure v1.6.pdf
- Standard Operating Procedure - Disturbance Monitoring - v1.0_2012-10-02.docx
- Standard Operating Procedure Kasigau - Forest Inventory v2.8_2012-11-12.pdf
- Standard Operating Procedure Kasigau - Leakage v1.0_01_01_2011.pdf

Documents Received 15 April 2013

- Phase 1 monitoring report v2.pdf

Documents Received during site visit (27 January 2013 – 1 March 2013)

- Carbon Calculator
- Site visit field data
- Kasigau – Quality Control Procedure, v1.6
- Kasigau Leakage Plots Phase I.xls
- Kasigau_T_test.xlsx

Documents Downloaded from CCB site

- Rukinga_CCB_PDD_Ver_2_0.pdf
- The_Kasigau_Corridor_REDD_PIR_Phase_I_2011_v2_1.pdf

Documents Downloaded from the VCS Website

- The Kasigau Corridor REDD Project Phase I – Rukinga Sanctuary, 2nd Monitoring Report (M_2)
- The Kasigau Corridor REDD Project Phase I – Rukinga Sanctuary, Project Document, V9
- The Kasigau Corridor REDD Project Phase I – Verification Report

Additional Documents Received From WWC

- Rukinga Carbon Model and NERs_M=3_v1.0.xlsm
- Rukinga Deep 1m Soil Analysis – RA v2.1.xlsx
- Rukinga M3 Raw carbon Data.xlsx