VERIFICATION REPORT OF THE KASIGAU CORRIDOR REDD+ PROJECT PHASE I – RUKINGA SANCTUARY

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Summary

This report describes the verification audit of the Kasigau Corridor REDD+ Project Phase I – Rukinga Sanctuary ("the project"), a Reduced Emissions from Deforestation and Degradation (REDD+) project located in the Taita Taveta County, Coast Province, Kenya, that was conducted by SCS Global Services. The purposes of the verification audit were (1) to conduct, in accordance with the VCS rules, an ex-post independent assessment of the GHG emission reductions and removals that have occurred as a result of the project during the monitoring period and (2) to conduct, in accordance with the CCB rules, an ex-post independent assessment of the climate, community and biodiversity impacts that have occurred or are on track to occur as a result of the project during the monitoring period. The verification audit was performed through a combination of document review, interviews with relevant personnel and on-site inspections. A total of 18 findings were issued during the verification process. The project complies with all of the verification criteria, and the assessment team has no restrictions or uncertainties with respect to the compliance of the project with the verification criteria, and the assessment team has no restrictions or uncertainties with respect to the compliance of the project with the verification criteria.

Table of Contents

1 Introduction 4
1.1 Objective 4
1.2 Scope and Criteria 4
1.3 Level of Assurance 5
1.4 Summary Description of the Project 5
2 Verification Process 5
2.1 Audit Team Composition (*Rules* 4.3.1) 5
2.2 Method and Criteria 5
2.3 Document Review 6
2.4 Interviews 7
2.5 Site Inspections 7
2.6 Resolution of Findings 8
2.7 Eligibility for Validation Activities 9
3 Validation Findings 9
3.1 Participation under Other GHG Programs 9
3.2 Methodology Deviations 9
3.3 Project Description Deviations (*Rules* 3.5.7 – 3.5.10) 9
3.4 Minor Changes to Project Description (*Rules* 3.5.6) 10
3.5 Monitoring Plans (CL3.2, CM3.3, B3.3) 10
4 Verification Findings 10
4.1 Public Comments (*Rules* 4.6) 10
4.2 Summary of Project Benefits 11
4.3 General 11
4.4 Climate 17
4.5 Community 32
4.6 Biodiversity 34
4.7 Additional Project Implementation Information 35
4.8 Additional Project Impact Information 35
5 Verification Conclusion 35
Appendix A: Verification Findings 37

1 INTRODUCTION

1.1 Objective

1.1.1 Verification Objectives Under the Verified Carbon Standard

In accordance with Section 5.1.1 the VCS Standard, SCS Global Services (SCS) carried out an ex-post independent assessment of the GHG emission reductions or removals that have occurred as a result of the project during the monitoring period, conducted in accordance with the VCS rules. In accordance with Section 2.1.2 of the VCS Validation & Verification Manual, V3.1, the objectives of the verification engagement were to evaluate the submitted monitoring report and assess the following:

- The extent to which methods and procedures, including monitoring procedures, have been implemented in accordance with the validated project description. This includes ensuring conformance with the monitoring plan as written in the Validation Report.

- The extent to which GHG emission reductions or removals reported in the submitted monitoring report are materially accurate.

The other objective of the verification engagement was to assess the non-permanence risk analysis.

1.1.2 Verification Objective Under the Climate, Community & Biodiversity Standards

In accordance with Section 4.1 of the CCB Program Rules (see reference in Section 1.3 below), SCS carried out an ex-post independent assessment of the climate, community and biodiversity impacts that have occurred or are on track to occur as a result of the project during the monitoring period, conducted in accordance with the CCB rules.

1.2 Scope and Criteria

1.2.1 Scope

In accordance with Section 4.3.4 of ISO 14064-3:2006, the scope was defined as follows:

- The project and, where relevant, its baseline scenarios
- The physical infrastructure, activities, technologies and processes of the project
- The GHG sources, sinks and/or reservoirs that are applicable to the project
- The types of GHGs that are applicable to the project
- The monitoring period, as discussed in Section 5 of this report

1.2.2 Criteria Under the Verified Carbon Standard

In accordance with Section 5.3.1 of the VCS Standard, the criteria for verification was the VCS Version 3, including the following documents:

- VCS Program Guide, V3.7
- VCS Standard, V3.7
- VCS AFOLU Requirements, V3.6
- VCS Non-Permanence Risk Tool, V3.3

- The VCS-approved methodology VM0009, V1.1 ("the methodology"), as applied to the project

1.2.3 Criteria Under the Climate, Community & Biodiversity Standards

In accordance with Section 1.1 of the CCB Program Rules (see below for full reference) the criteria for verification was established as follows:

- The most recent validated project description using the same edition of the Climate, Community & Biodiversity Standards (in this case, the second edition) that was used for that validation
- All CCB Version 3 program documents other than the third edition of the Climate, Community & Biodiversity Standards, including the following:
  - CCB Standards Rules, V3.1
  - CCB Program Definitions, V3.0

1.3 Level of Assurance

1.3.1 Level of Assurance Under the Verified Carbon Standard

In accordance with Section 5.3.1 of the VCS Standard, the level of assurance of this report, insofar as it describes work performed under the Verified Carbon Standard, is reasonable.

1.3.2 Level of Assurance Under the Climate, Community & Biodiversity Standards

The concept of "level of assurance" was not relevant to work performed under the Climate, Community & Biodiversity Standards.

1.4 Summary Description of the Project

The project is located in the Taita Taveta County, Coast Province, Kenya and is aimed at reducing emissions from unplanned deforestation. The project is also aimed at provided net positive benefits to both communities and biodiversity in the project zone.

2 VERIFICATION PROCESS

2.1 Audit Team Composition (*Rules* 4.3.1)

1. The verification team consisted of Francis Eaton (Lead Verifier) and Vettes Kalkema (Local Expert). The following bullets describe the qualifications of the audit team.

2. Vettes Kalema has over 30 years of expertise in community agricultural projects in Tanzania, Kenya, and Uganda. Mrs. Kalema is fluent in KiSwahili.

3. Francis has six years of experience working on REDD+ projects with six projects taking place in Kenya. Mr. Eaton has a BA in Forestry with a focus on ecological restoration and conservation biology. Mr. Eaton also hold a Masters degree in Forest Science.

2.2 Method and Criteria

The verification was performed through a combination of document review, interviews with relevant personnel and on-site inspections, as discussed in Sections 2.2 through 2.4 of this report. At all times, the monitoring report and non-permanence risk analysis were assessed for conformance to the criteria

described in Section 1.2 of this report. As discussed in Section 2.6, findings were issued to ensure conformance to all requirements.

The audit team created a sampling plan following a proprietary sampling plan workbook developed by SCS Global Services. Per Section 4.4.3 of ISO 14064-3:2006, the audit team identified possible risks of errors, omissions and misrepresentations with respect to the verification criteria. For each identified risk, the audit team assessed the likelihood of the material discrepancy occurring, the likelihood of the material discrepancy not being prevented or detected by the controls of the project and the likelihood of the material discrepancy not being detected by the audit team. Sampling and data testing activities were planned to address any risk where the likelihood of a material discrepancy not being detected by the audit team was judged to be unacceptably high. The audit team then created a verification plan that took the sampling plan into account.

2.3 Document Review

The monitoring report v1.5 (dated 23 July 2018) was carefully reviewed for conformance to the verification criteria. The following additional documentation, provided by Project Personnel in support of the aforementioned documents, was also reviewed by the audit team:

Document	File Name
Project Description (PD)	PROJ_DESC_562_25JAN2011.pdf
Initial monitoring report	MONIT_REP_562_01JAN2012_31DEC2012.pdf
Risk report	VCS Non-Permanence Risk Report Kasigau I_M5_v4
Leakage calculations	Phase I Leakage Model_M5_v1
CCB PDD	Project Design Document – 9 Sept 2009
Initial CCB monitoring plan	Monitoring Plan – 9 Sept 2009
Soil Calculations	Kasigau Corridor Soil Calc v3
GHG calculations	Rukinga Carbon Model and NERs_M=5_v3
Disturbance monitoring procedures	Standard Operating Procedure - Disturbance Monitoring - v2.0_2018-07-20
Inventory procedures	Standard Operating Procedure Kasigau - Forest Inventory v2.8_2012-11-12
Leakage procedures	Standard Operating Procedure Kasigau - Leakage v1.0_01_01_2011
Soil procedures	Standard Operating Procedure Kasigau - Soil v1.0_5_24_2011
Quality control procedures	Quality Control Procedure v1.6
Quality control calculations	Kasigau Corridor Phase 1 QA_QC M5 v2
Project area GIS files	PhaseI_ProjectArea.shp
Leakage area GIS files	LeakageArea.shp
Plot locations GIS files	PhaseI_Plots.shp
Community locations GIS files	Communities.shp
Natural risk literature	Andersson etal 2004_ Tropical Savannah Woodland Bond and Keeley 2005_Fire as a Global Herbivore Chapin 2009_Managing Ecosystems Sustainably Diaz etal 2006_Biodiversity Loss Threatens Human Wellbeing Rao 2013_Assessing Seismic Risk in Kenya Ryan and Williams 2011_How Does Fire Intensity and Frequency affect Miombo Woodlands Trollope etal 2002_Fire behaviour a Key Factor in the Fire Ecology of African Grasslands and Savannas

	Scholes and Archer 1997_Tree Grass Interactions in Savannahs
Stakeholder comments	Public Comments Kasigau Phase I and II
Grievance records	Various grievance records
Letter granting exemption request, dated 24 August 2018	Wildlife Works Kasigau Phase 1 Baseline Reassessment Exemption 24AUG 2018

Because the audit team simultaneously performed verification assessments of both the Phase I and Phase II REDD+ projects, the public comment documents listed above included comments from both projects.

2.4 Interviews

The process used in interviewing Project Personnel was a process wherein the audit team elicited information from Project Personnel regarding the project and its compliance with the verification criteria. Some meetings were held concurrently with site inspections (see Section 2.4 below). Other meetings were held remotely via telephone or Skype connection.
The following personnel associated with the project proponent and/or other entities involved in the project were interviewed.

Individual	Affiliation	Role	Date(s) Interviewed
Jeremy Freund	Wildlife Works Carbon LLC. (WW)	VP Carbon Development	Throughout Audit
Simon Bird	WW	Carbon Development	Throughout Audit
Cara Braund	WW	Office Manager	28 May-6 June 2018
Jamie Hendriksen	WW	Vice President of Africa Field Operations	28 May-6 June 2018
Kevin Hillacre-Richards	WW	Director of Regional Operations	28 May-6 June 2018
Laurian Lenjo	WW	Community Relations Manager	28 May-6 June 2018
Mwangi Githiru	WW	Biodiversity and Community Monitoring	28 May-6 June 2018
Nicholas Aguili	WW	Human resources Manager	28 May-6 June 2018
Philip Huo Njorge	WW	Finance Manager	28 May-6 June 2018
Eric Sagwe	WW	Head Wildlife Ranger	28 May-6 June 2018
Joshua Kitiro	WW	Biomass Team Supervisor	28 May-6 June 2018
Mathias Kakoi	WW	Biomass Team Leader	28 May-6 June 2018
Moses Mamodo	WW	Biomass Team Leader	28 May-6 June 2018
Cyprian Midaidasi	WW	Biomass Team Leader	28 May-6 June 2018
Darius Mkala	WW	Biomass Team Member	28 May-6 June 2018
Soloman Makau	WW	Biomass Team Member	28 May-6 June 2018

2.5 Site Inspections

The objectives of the on-site inspections performed were to:

- Select samples of data from on-the-ground measurements for verification in order to meet a reasonable level of assurance and to meet the materiality requirements of the project, as required by Section 5.1.3 of the VCS Standard;

- Perform a risk-based review of the project area and project activities to ensure that the project conformed to the requirements of the verification criteria throughout the monitoring period;

- Confirm the validity of information presented in the non-permanence risk report; and

- Ensure that monitoring was conducted in accordance with the requirements of the validated monitoring plan, the methodology employed and the VCS rules.

In fulfilment of the above objectives, the audit team performed an on-site inspection of the project area on the dates 28 May – 6 June 2018. The main activities undertaken by the audit team were as follows:

- Interviewed Project Personnel (see Section 2.3 of this report) to gather information regarding the monitoring of the project;

- Interviewed Project Personnel (see Section 2.3 of this report) for the purpose of seeking evidence of conformance with respect to the specific requirements of the methodology and the VCS and CCB rules;

- Interviewed residents of communities near the project boundary to confirm the claims of the project proponents with respect to the extent of community engagement with the project implementation.

- Viewed Project Personnel conducting re-measurements on inventory plots. The representatives were asked to replicate the measurement protocol that was applied, for the purpose of providing the audit team with reasonable assurance that the measurements were collected to appropriate quality standards.

- Re-sampled a subset of soil plots for testing the project reported data

2.6 Resolution of Findings

Any potential or actual material discrepancies identified during the assessment process were resolved through the issuance of findings. The types of findings issued by SCS Global Services were characterized as follows:

Non-Conformity Report (NCR): An NCR signified a material discrepancy with respect to a specific requirement. This type of finding could only be closed upon receipt by SCS Global Services of evidence indicating that the identified discrepancy had been corrected. Resolution of all open NCRs was a prerequisite for issuance of a verification statement. A total of 13 NCRs were issued during the verification engagement.

New Information Request (NIR): An NIR signified a need for supplementary information in order to determine whether a material discrepancy existed with respect to a specific requirement. Receipt of an NIR did not necessarily indicate that the project was not in compliance with a specific requirement. However, resolution of all open NIRs was a prerequisite for issuance of a validation statement. A total of 5 NIRs were issued during the validation engagement.

Observation (OBS): An OBS indicates an area where immaterial discrepancies exist between the observations, data testing results or professional judgment of the audit team and the information reported or utilized (or the methods used to acquire such information) within the GHG assertion. A root cause analysis and corrective action plan are not required, but highly recommended. Observations are

considered by the audit team to be closed upon issuance, and a response to this type of finding is not necessary. One OBS was issued during the validation engagement.

All findings issued by the audit team during the verification process have been closed. In accordance with Section 5.3.6 of the VCS Standard, all findings issued during the validation process, and the impetus for their closure, are described in Appendix A of this report.

2.6.1 Forward Action Requests

The validation/verification body conducting the subsequent verification audit should be aware that, as described in Section 3.3 below, the baseline re-evaluation will need to be validated concurrently with the verification engagement.

2.7 Eligibility for Validation Activities

This section is not applicable, as SCS holds accreditation for validation for the relevant sectoral scope (scope 14; AFOLU).

3 VALIDATION FINDINGS

3.1 Participation under Other GHG Programs

This section is not applicable, as the project is not, at this time, seeking registration under the VCS Program and an approved GHG program.

3.2 Methodology Deviations

This section is not applicable, as no methodology deviations have been applied by the project to date.

3.3 Project Description Deviations (*Rules* 3.5.7 – 3.5.10)

One project description deviation was validated as part of the verification engagement described in this report. As reported in Section 2.2.4 of the monitoring report, there was a deviation to the schedule for baseline re-evaluation as set out in Section 5.2 of the PD. The audit team has learned, from discussions with project personnel, that the PD was written with the understanding that the baseline re-evaluation would need to take place on a 10-year schedule beginning with the project start date, but that the project proponent subsequently reached the understanding that the baseline re-evaluation should take place on a 10-year schedule beginning with the time of project validation. Section 3.1.10 of the AFOLU Requirements is not highly prescriptive on this point and can be interpreted variously, though it is the audit team's understanding that the intent of the requirement was to have the 10-year schedule began at the project start date. The project proponent received an exemption to the requirement of Section 3.1.10 of the AFOLU Requirements (see Section 2.3 above). The exemption letter permits an exemption in respect of the 1 January 2015-31 December 2017 monitoring period, provided that "the project undergo reassessment of the baseline per the requirements of Section 3.1.10 of the AFOLU Requirements at the next verification". This deviation has no impacts on the applicability of the methodology (which does not specify the baseline re-evaluation schedule as an applicability condition) or additionality, and it is the understanding of the audit team that the decision made by Verra in granting the exemption described above supersedes any assessment the audit team would otherwise make with respect to the impacts of the project description deviation on the appropriateness of the baseline scenario.

Therefore, the project description deviation is appropriately described and justified, and the project remains in compliance with the CCB Version 2 and (with the exception of Section 3.1.10 of the AFOLU Requirements, to which an exemption has been granted) the VCS rules. Therefore, the project description deviation is valid.

3.4 Minor Changes to Project Description (*Rules* 3.5.6)

For the project monitoring period two minor deviations were noted by the team. In both cases the deviations should be considered minor; the audit team's assessment regarding these deviations is follows:

1. The project changed the methodology for assessing cleared forest areas during the monitoring period. The previous disturbance monitoring methodology required the project to install biomass plots to assess the amount of biomass lost during the disturbance. For this monitoring period, project personnel simply removed the clearing from the respective biomass strata, resulting in a conservative estimate of GHG emission reductions. The deviation does not affect the applicability of the methodology, nor does it affect the determination of the baseline.

2. The project changed the methodology for how soil plots were located by the project field team. In the previous soil collection methodology, project personnel ensure plots were located using a GPS for a specific location. For this monitoring period, plots were located near previous sampling plots where such could be relocated. The verification team agrees that this change has no chance to bias the results and is likely to ensure greater consistency given the spatial and temporal variability of available soil carbon. There is no reason to expect that the location of the plot would affect the accuracy of the reporting, the applicability of the methodology or the determination of the baseline scenario.

In closing, the verification team has no reservations regarding the appropriateness of the project description deviations implemented by project personnel.

3.5 Monitoring Plans (CL3.2, CM3.3, B3.3)

Not applicable

4 VERIFICATION FINDINGS

4.1 Public Comments (*Rules* 4.6)

The audit team received comments from Verra dated 22 June 2018. All comments regarded the same issue and are summarized as follows:

- Members of the project biomass sampling team commented that they were receiving unfair pay and that attempts by the project biomass sampling team to review salaries with the project proponent had gone unfulfilled.
- During the site visit, the audit team held interviews with individuals from both the project proponent and the biomass team separately. It became apparent early on that the issue of fair pay was not an issue with respect to the CCB rules. The verification team reviewed the team salaries and cross checked them against similar occupation wages posted publicly for the country of Kenya. Whereas, the team had not received earnings increases in the recent past, the wages received are far above those required by Kenyan labor laws.
- In addition, the audit team held a Skype call with both the project proponents and the biomass team after attempts at reconciliation had occurred. The purpose of the presence of the audit team on the call was not mediate a resolution but, rather, to observe the actions taken by the project proponent to address the grievance in order to ensure that all relevant requirements of the CCB Standards had been fulfilled. The resolution offered by the project proponent was that salaries will be reviewed at the end of the 2018 calendar year.

It is the professional opinion of the audit team that the project proponents handled the situation in accordance with project policies for grievance redress and in an appropriate fashion. It is important to note that while the redress procedure sates the process typically involves mediation by the local administrative chief, this was not the case for this issue. As the grievance was in regard to pay, an issue that does not require the involvement of a local administrative chief, the project responded in writing within thirty days of receiving the grievance and, in the judgment of the audit team, made a reasonable attempt to resolve the issue. It is important to note that any specific assessment of whether the rate of pay for a project worker is commensurate with the value of the services rendered by said worker is outside of the scope of the verification engagement—the audit team simply assessed whether a reasonable attempt was made to resolve the grievance.in an fashion The audit team is willing to provide further information regarding the situation to Verra personnel upon request, as certain dimensions of the audit team's assessment of the situation are excluded from this publically available report.

4.2 Summary of Project Benefits

The audit team reviewed sections 1.1 and 1.2 of the project monitoring report and confirmed that the sections provide an adequate summary of the project benefits. All items required to be monitored and reported on have been include as required. Furthermore, all items summarized are supported in the appropriate climate, community, and biodiversity sections.

4.3 General

4.3.1 Implementation Status (G3.4, CL1.5)

The audit team assessed the implementation of the project activities against Section 4.3 of the Project Description. The audit team confirmed that Section 2.1 of the monitoring report provided an accurate description of the implementation of the project. For a complete description of the steps taken to assess the project implementation see below:

Item	Verification Findings
Material discrepancies between project implementation and the project description	The audit team performed a series of visits to the communities included in the project and observed the project activities taking place. The audit team held interviews with members of communities involved in the project and were informed that the project had thus far met all commitments in terms of the project activities. No material discrepancies were found.
Implementation status of monitoring plan and completeness of monitoring	Audit team confirmed that all monitoring activities documented in Section 3.1.3 of the monitoring report were correctly carried out accordingly with the requirements and frequency of the monitoring plan described in Section 5.2 and 5.3 of the PD, through the following: • Remeasured 10 plots across the project area and confirmed that the methods conformed to the sampling design as described in the field operating procedures (see Section 2.5 of this report), as well as best practices in forest mensuration. In addition, the audit team recalculated basal area for plots remeasured during the field verification

Item	Verification Findings
	and consistently produced the same results as the project team. • Spent one week in the field with the project team, both re-measuring plots and confirming the implementation of project activities within communities and confirmed that the organizational structure and operation is as described in Section 2.4 of the monitoring report • Reviewed the process for data management and storage and confirmed that the description provided in Section 3.1.3 of the monitoring report was followed completely and is sufficient for providing quality data management and storage • Interviewed biomass team while on site and confirmed that the personnel were highly skilled and educated as to the processes described in the field operating procedures. In addition, the audit team spent over a week in both the office and the field with the team and confirmed that the description provided in the monitoring report was generally being followed completely • Reviewed the allometric equations provided by Project Personnel and confirmed that the equations were correctly calculated in the workbooks. Finally, the audit team re-calculated the plot level biomass for a random plot selected for the field verification and produced consistent results with those reported in the project calculations (see Section 2.5 of this report) • The audit team reviewed the calculation of baseline emissions as prescribed by the methodology. The audit team confirmed the simple addition to the value from the

Item	Verification Findings
	previously validated baseline emissions model was calculated correctly • Re-calculated the uncertainty deduction, as prescribed by the methodology and confirmed that the value provided in the project calculations to be accurate • Reviewed the process for the detection of forest fires across the project area. The audit team confirmed that the monitoring, as described in the disturbance monitoring procedures, was being followed appropriately and reported accordingly • Reviewed records for leakage plots in the Project Area. In all cases the audit team confirmed the reported data to be consistent with the field records. In addition, the audit team agrees that the leakage monitoring employed by the Project is very likely to result in a conservative estimate of GHG emission reductions or removals • Re-calculated the GHG emission reductions or removals using a stepwise approach for each carbon pool included in the Project Area. The audit team values were consistent with those of the project. The audit team has a reasonable level of assurance that the area reported in the project calculations is accurate
Existence of material discrepancies between monitoring system and monitoring plan (as described in 4.3 of project description) and applied methodology	• All tasks described in Section 3.1.3 of the monitoring report agreed with the monitoring plan as described above. No material discrepancies were found.
Whether GHG emission reductions or removals generated by the project have become included in emissions trading program or other mechanism that includes GHG allowance trading	• Audit team confirmed that REDD+ projects are not within scope of Clean Development Mechanism • Audit team applied professional judgment to determine there is very low risk of GHG emission reductions or removals having been included in any other program

Whether project has received or sought any other form of environmental credit, or has become eligible to do so since validation or previous verification	• Audit team is unaware of any other environmental crediting program that project would be eligible to participate in
Whether project has participated or been rejected under any other GHG programs since validation or previous verification	• The audit team confirmed that the project has not previously been rejected by the VCSA and that a compliance program does not exist in Kenya at this time. Therefore, the risk of the project not being in conformance with this requirement is non-existent currently
Sustainable development contributions	• Audit team reviewed the project monitoring plan and confirmed that it provides the necessary information regarding sustainable development. In addition the team reviewed the Vision 2030 plan instituted by the Kenyan government to meet the countries sustainable development goals. Finally, the team confirmed that the project is monitoring conditions described in the Vision 2030 plan in efforts to help the country meet its goals.N/A

Prior to this monitoring period the audit team noted two project description deviations.

1. "There is one change from the parameters described in the Project Description. The parameter δLE, δLE was listed in the PD with a value of 0.4498, it was subsequently discovered that the equation was incorrect and with the corrected equation the parameter was recalculated at -0.564. There have been no other major deviations from the monitoring plan described in the PD, section 13 Monitoring, or in the monitoring standard operating procedure documents: 'Standard Operating Procedure - Biomass' and 'Standard Operating Procedure – Soils."

The verification team reviewed the listed deviation and confirmed that the correct parameter values are now in place and the deviation was correctly included in the second monitoring report. Given the breadth of the deviation the audit team confirmed that the deviation does not affect the applicability of the methodology nor does it affect the determination of the baseline scenario. The audit team confirms the deviation to be appropriate.

2. "There is one change from the parameters described in the Project Description. In the first year of the Project 5 leakage plots were moved, however in this monitoring period it was discovered that due to an over-site the leakage model had not been updated to reflect the new plot values. With this update the parameter $\delta_{LE}, \delta LE$ has changed from -0.564 to - 0.762."

The verification team reviewed the listed deviation and confirmed that the correct parameter values are now in place and the deviation was correctly included in the third monitoring report. Given the breadth of the deviation the audit team confirmed that the deviation does not affect the applicability of the methodology nor does it affect the determination of the baseline scenario. The audit team confirms the deviation to be appropriate.

The audit team concludes that all deviations to date are minor in nature and were made to correct errors not caught by previous verifiers. All deviations are appropriate according to the rules and the project has been implemented as described in the validated project description

4.3.2 Risks to the Project (G3.5)

The audit team reviewed the risks associated with the project activities prior to arriving on site, as well as any mitigation plans in place to avoid such risks. Once on site, the verification team held interviews with project personnel and local community members. In all cases the verification team was able to confirm the language in the monitoring report to be a correct assessment of the risks associated with the project activities. Also, the verification team has a history of working in the regions and have a strong understanding of the risk of such projects and agrees that the list provided in the monitoring report to be complete.

In addition to reviewing the risks in the monitoring report, the audit team reviewed the mitigation plans in place to ameliorate such risks. For each risk listed, the project has identified mitigation activities specific to the risk. Whereas, only time will tell if these mitigation factors are successful, it is the professional opinion of the audit team that the mitigation plans are designed to succeed.

4.3.3 Enhancement of High Conservation Values (G3.6)

The audit team reviewed the project plan for the maintenance and enhancement of the project high conservation values (HCV's). The audit team agrees with the project assessment that the project HCV's are maintained and enhanced through forest protection. Given that the community HCV's are inherently correlated with the climate benefits, the audit team agrees that avoided deforestation only results in positive impacts on the community HCV's. Finally, as forest protection is not an extractive or a deleterious activity, the process for maintaining and enhancing HCV's is in line with the precautionary principle.

4.3.4 Benefit Permanence (G3.7)

As project benefits are directly correlated with carbon revenue, the assessment of the permanence of project benefits was assessed by the audit team while conducting a variety of different verification activities. Examples of such activities included ensuring that the revenue sharing mechanism in place is working for the communities that support the project. In addition, to date the other highly important activity for ensuring permanence is adequate training for community members taking part in the project. The audit team review training materials and confirmed that the training plans include opportunities for local communities to continue to carry out such trainings beyond the project lifetime. These include conservation agricultural skills, bee keeping, reforestation activities, environmental education, and sustainable charcoal making. Through interviews with community members, the audit team was able to confirm that at this time procedures are in place to ensure project benefits beyond the project lifetime and are consistent with the implementation plans described in the PD.

4.3.5 Stakeholder Engagement (G3.8 – G3.9)

To assess the projects consultation methods used to inform communities as to the status of the project, including but not limited to the timing of the 30-day public comment period and the availability of the audit team on site, the audit team performed the following:

- Reviewed the consultation procedures, as described in the PD.
- Reviewed documents located in the project headquarters to ensure records of information sharing and consultation meetings are kept and archived according to the data management procedures described in the PD.
- After gleaning all information from the previous steps, interviewed local community members as to the validity of what is being claimed by the project proponents.

In all cases, the audit team was able to confirm that the validated procedures in place as of the time of the previous verification (also performed by SCS) were taking place during this monitoring period. Community members were highly educated as to the status of the project and were able to provide dates and locations as to where such information sharing took place. It is important to note that a high level of illiteracy exists throughout the project area, so in many cases full documentation is provided in the form of posters or summaries that can be easily translated and explained to locals.

Finally, the audit team met with individuals who had provided comments and feedback throughout the monitoring period who confirmed that their voices had been heard and project personnel had responded appropriately. Based on all the above the audit team confirms that the project has indeed carried out effective stakeholder engagement.

4.3.6 Stakeholder Grievance Redress Procedure (G3.10)

Prior to the site visit, the audit team reviewed the project grievance redress procedures as described in the PD. Once on site, the audit team reviewed the grievance records (see section 1.7 of this report) held at the project headquarters and confirmed that the grievances and responses were properly documented and archived. After gleaning all information available at the project headquarters, the audit team interviewed local community members as to the workings of the redress procedure and asked for feedback from those who had raised grievances during the monitoring period. In all cases the audit team was able to confirm that the project grievance procedures were carried out effectively in accordance with the validated PD. In all cases but one, the grievances were resolved and in all cases the audit team confirmed that project personnel have made all reasonable attempts to resolve grievances as required by the CCB Standards.

4.3.7 Worker Relations (G4.3 – G4.6)

Prior to the site visit and during the previous verification (also performed by SCS), the audit team reviewed the project monitoring report and cross checked the claims in the monitoring report against the requirements of the CCB standards. Once on site the audit team reviewed both employment and training records, as well has project hiring procedures. The results of the investigation showed that most of the project employees were hired from local communities and were trained for their respective positions.

After understanding tKenyan labor laws, the audit team interviewed project employees as to the requirements of the standards regarding employment. In most all cases, employees recalled being made aware of their rights as workers and had both been made aware of the risks associated with their work and had been provided training and tools to mitigate those risks. In addition, the audit team witnessed a number of individuals performing project tasks and confirmed that practices were in place to minimize risk as much as possible.

4.3.8 Technical and Management Capacity (G4.2, G4.7)

The audit team reviewed the monitoring report and confirmed that it documents the key technical skills that will be required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills. The audit team confirmed that the project management team of WW have successfully designed and implemented such projects.

WW have a unique team in which all the technical staff are full time employees of the company. Both during the site visit and during the previous verification (also performed by SCS) the audit team interviewed staff members, reviewed employee's knowledge through review of their CV's, and reviewed project work products.

In addition, the audit team reviewed financial records while assessing the project budget and were able confirm that the budget was accurately calculated using real and verifiable inputs. The audit team cannot say whether the project will succeed long term, as the budget includes predictions of future carbon sales and prices. The audit team can say however, that the financial analyses were preformed according the

rules of the VCS and using best practices for financial accounting. Finally, while on site, the audit team reviewed financial records for WW including non-project costs and revenues, including evidence of outside financial support (see section 2.4.6 of the monitoring report) and confirmed that that the documentation provided is verifiable and that sufficient funds are available for implementing the project.

Based on the activities described above, the audit team was able to confirm that the project has the capacity to implement the project as described in the validated project description.

4.3.9 Legal Status (G5.1)

The audit team has a history of working in the region of the project area and are well versed with the land-use laws covering the project area. There are no restrictions in Kenya regarding forest protection and interactions with community members must follow local customs. The audit team held interviews with wildlife officials and community leaders who confirmed claims in the monitoring report that the project isfollowing all legal requirements regarding the project activities.

4.3.10 Rights Protection and Free, Prior and Informed Consent (G5.3-G5.5)

Whereas, this project is not a grouped project and Free Prior and Informed Consent (FPIC) was confirmed at validation, the verification team chose to employ a methodology in which any changes to the agreed upon project design that have occurred would be assessed. To ascertain if any changes have taken place that would require the FPIC process to be reopened, the audit team cross checked the monitoring report against the validated PD and confirmed that no changes were present with respect to community engagement processes In addition, the audit team held interviews with community members throughout the project zone and confirmed that in no case have instances of the following occurred:

- Property rights have not been respected.
- The property is encroaching uninvited on private, community, or government property.
- The project did not have the FPIC of those whose property rights are affected by the project
- People were forced to relocate as a result of the project.

Based on the above and information gleaned from community interviews, the audit team was able to confirm that the rights of Indigenous Peoples, communities and other stakeholders in accordance to the Climate, Community & Biodiversity Standards and the validated project design.

4.3.11 Identification of Illegal Activities (G5.5)

As understood from the previous verification and interviews with local community members, there are three main illegal activities that could affect the project activities: poaching, illegal timber harvest and slash and burn agriculture from outside communities. The audit team reviewed the validated PD and confirmed through employee and community interviews that the project activities implement to mitigate such activities as employing game scouts to patrol the project area and decrease incidences of charcoaling and poaching. The project is also working to help land owners gain land title to ensure the rights to prohibit new settlements on their land.

4.4 Climate

4.4.1 Accuracy of GHG Emission Reduction and Removal Calculations

The GHG emission reductions or removals have been quantified correctly in accordance with the project description and the applied methodology.

For all instances in which values were transcribed between datasets (e.g., transcription from the project description to reporting workbooks, or between reporting workbooks), the audit team carefully traced values to ensure the absence of manual transposition errors.

An identification of the data and parameters used to calculate the GHG emission reductions or removals and a description of the steps taken to assess each of them, follows.

4.4.1.1 Data and Parameters Available at Validation (or First Verification)

GHG emission reductions or removals

	Steps taken by audit team to assess...		
Data/Parameter	**Accuracy of GHG emission reductions or removals**	**Whether methods/formulae set out in project description have been followed**	**Appropriateness of default values**
$\delta_{LE}, \hat{\delta}_{LE}$	N/A (confirmed at validation)	The audit team reviewed the leakage model and confirmed that previously validated and verified parameter following equation 9 of the methodology has not changed	N/A
$\hat{\eta}$	N/A (confirmed at validation)	The audit team reviewed the leakage model and confirmed that previously validated and verified parameter following equation 7 of the methodology has not changed	N/A
λ	N/A (confirmed at validation)	The audit team reviewed the soil carbon model and confirmed that previously validated and verified parameter follows the methodology with respect to project measured data has not changed	N/A
ρ_{sp}	N/A (confirmed at validation)	The audit team reviewed the biomass calculations and confirmed that previously validated and verified parameter follows the methodology with respect to project	N/A

		measured data has not changed	
$\hat{\sigma}_{DF}$	N/A (confirmed at validation)	The audit team reviewed the biomass cumulative deforestation model and confirmed that previously validated and verified parameter follows the methodology with respect to standard deviation has not changed	N/A
$a_{project}$	N/A (confirmed at validation)	The audit team reviewed the GHG calculations and confirmed that previously validated and verified parameter follows the methodology with respect total project area has not changed	N/A
a_{LE}	N/A (confirmed at validation)	The audit team reviewed the leakage model and confirmed that previously validated and verified parameter follows the methodology with respect to total project area has not changed	N/A
cf_{sp}	N/A (confirmed at validation)	The audit team reviewed the biomass calculations and confirmed that previously validated and verified parameter follows the methodology with respect to total project area has not changed	N/A
$d_{j,k}$	N/A (confirmed at validation)	The audit team reviewed the soil data reported for project validation and confirmed that the initial values are consistent with those included in the project soil organic carbon workbooks	N/A
$f_{sp}(\cdot)$	The audit team recalculated tree biomass for the project area using the	The audit team reviewed the allometric equations and cross checked them against	N/A

	appropriate allometric equations for each species and compared the results to the project data and confirmed the project data is accurateN/A (confirmed at first verification)	the previously verified equations and confirmed they have not changed	
$\hat{\ell}_{max}$	N/A (confirmed at validation)	The audit team reviewed the biomass calculations and confirmed that previously validated and verified parameter follows the methodology with respect to total project area has not changed	N/A
$\hat{m}_{LE}$	N/A (confirmed at validation)	The audit team cross checked the leakage calculations against the project description and previous monitoring period and confirmed that the sample size in the leakage area has not changed	N/A
n_{SCL}	N/A (confirmed at validation)	The audit team reviewed the soil carbon loss model and confirmed that previously validated and verified parameter following equation 19 of the methodology has not changed	N/A
p_{forest}	N/A (confirmed at validation)	The audit team reviewed the GHG calculations and confirmed that previously validated and verified parameter follows the methodology with respect to the proportion of the project area forested has not changed	N/A
p_{BGLT}	N/A (confirmed at validation)	The audit team reviewed the NER calculations and confirmed that previously validated and verified parameter follows the	N/A

		methodology with respect to large tree belowground biomass emissions has not changed	
r_{sp}	N/A (confirmed at validation)	The audit team reviewed the biomass calculations and confirmed that previously validated and verified parameter follows the methodology with respect to the root to shoot ratio for species has not changed	N/A
U_{DF}	N/A (confirmed at validation)	N/A (confirmed at validation)	N/A

4.4.1.2 Data and Parameters Monitored

	Steps taken by audit team to assess…		
Data/Parameter	**Accuracy of GHG emission reductions or removals**	**Whether methods/formulae set out in project description have been followed**	**Appropriateness of default values**
$\rho_{soil,j,k}$	The audit team collected soil samples while on site and calculated bulk density for the samples. The audit team compared the results to those reported by project personnel and confirmed the project data to be accurate.	The audit team reviewed project soil sampling procedures, as described in the project soil standard operating procedures and witnessed project personnel determining soil bulk density in the field and confirmed that the methods described in the methodology were followed.	N/A
$a_{j,k}$	The audit team observed the set-up and re-measurement of biomass plots and confirmed that the radii for plots as described in the monitoring plan was followed exactly	The audit team reviewed the guidelines for sampling in Appendix B of the methodology were followed	N/A
a_k	The audit team recalculated the area for each stratum using the calculated geometry function in Arc Map for the project area shapefiles	Confirmed that the project followed the guidance for stratification as set out in Section 1Appendix B of the methodology	N/A

	Steps taken by audit team to assess…		
Data/Parameter	**Accuracy of GHG emission reductions or removals**	**Whether methods/formulae set out in project description have been followed**	**Appropriateness of default values**
	and confirmed that the strata areas has been calculated correctly		
$cf_{soil,j,k}$	N/A - direct soil samples were not collected this monitoring period	N/A	N/A
$dbh_{i,j,k}$	The audit team observed the re-measurement of field plots by the project biomass team and re-measured 10 randomly selected plot and confirmed that tree diameters were collected accurately	N/A – The methodology does not contain methods or formulae for this parameter	N/A
$h_{i,j,k}$	The audit team observed the re-measurement of field plots by the project biomass team and re-measured one randomly selected plot and confirmed that tree heights were collected accurately	N/A - The methodology does not contain methods or formulae for this parameter	N/A
ν	The audit team observed the re-measurement of field plots by the project biomass team and confirmed that shrub was collected accurately and as described in the monitoring plan	N/A - The methodology does not contain methods or formulae for this parameter	N/A
$\mathrm{m}_{dry,j,k}$	The audit team re-calculated project biomass for the non-tree parameter and confirmed that the validated parameter value was being applied correctly	N/A - The methodology does not contain methods or formulae for this parameter	N/A
$r_{BASE,i,j,k}$	The audit team re-calculated project biomass for the standing dead tree parameter and confirmed	N/A - The methodology does not contain methods or formulae for this parameter	N/A

	Steps taken by audit team to assess...		
Data/Parameter	**Accuracy of GHG emission reductions or removals**	**Whether methods/formulae set out in project description have been followed**	**Appropriateness of default values**
	that the validated parameter value was being applied correctly		
$r_{TOP,i,j,k}$	The audit team re-calculated project biomass for the standing dead tree parameter and confirmed that the validated parameter value was being applied correctly	N/A - The methodology does not contain methods or formulae for this parameter	N/A
$C_{AGNT}^{[m]}$	The audit team re-calculated project biomass for the aboveground non-tree parameter and confirmed that the validated parameter value was being applied correctly	The audit team cross checked the calculation against equation 54 of the methodology and confirmed that the project calculations use the appropriate formulae	N/A
$C_{BGLT}^{[m]}$	The audit team re-calculated project biomass for the belowground large tree parameter and confirmed that the validated parameter value was being applied correctly	The audit team cross checked the calculation against equation 50 of the methodology and confirmed that the project calculations use the appropriate formulae	N/A
$C_{BGNT}^{[m]}$	The audit team re-calculated project biomass for the belowground non-tree parameter and confirmed that the validated parameter value was being applied correctly	The audit team cross checked the calculation against equation 64 of the methodology and confirmed that the project calculations use the appropriate formulae	N/A
$C_{SDW}^{[m]}$	The audit team re-calculated project biomass for the standing dead tree parameter and confirmed that the validated parameter value was being applied correctly	The audit team cross checked the calculation against equation 44 of the methodology and confirmed that the project calculations use the appropriate formulae	
$C_{SOIL}^{[m]}$	The audit team collected soil samples and had them analyzed at a reputable soils lab in Nairobi. Using the results from the verification sample, the audit team	The audt team recalculated soil organic carbon for a sample of the project soil plots and confirmed that the project has correctly applied the methods and formulae	N/A

	Steps taken by audit team to assess...		
Data/Parameter	**Accuracy of GHG emission reductions or removals**	**Whether methods/formulae set out in project description have been followed**	**Appropriateness of default values**
	confirmed the soil data reported by project personnel to be accurate	allowed by the methodology.	
$o_i^{[m]}$	The audit team observed the re-measurement of two leakage plots and recalculated the proportion of degradation caused by leakage and confirmed that the project calculations were accurate	The audit confirmed that the calculation of degradation followed the methods set out in Section 10.3.2 of the methodology	N/A
$\bar{o}^{[m]}$	The audit team recalculated the average state of observations reported by the project and confirmed that the reported project value for this parameter was calculated accurately	N/A – Basic average calculation	N/A
F_{LE}	N/A the cumulative deforestation and degradation predicted is not updated until the baseline re-evaluation	N/A	N/A
$\hat{r}_{LE}^{[m]}$	The audit team estimated leakage factor as a proportion of baseline emissions reported by the project and confirmed that the reported project value for this parameter was calculated accurately	The audit team cross checked the project calculations against equation 33 of the methodology and confirmed the methodology formulae was followed	N/A
$\boldsymbol{v_{i,j,k}}$	The audit team re-calculated project biomass for the standing dead tree parameter and confirmed that the validated parameter value was being applied correctly	N/A - The methodology does not contain methods or formulae for this parameter	N/A
$y_{INTACT,j,k}$	The audit team re-calculated project biomass for the standing dead tree parameter and confirmed that the validated parameter value was being applied correctly	N/A - The methodology does not contain methods or formulae for this parameter	N/A
$y_{DECAYED,j,k}$	The audit team re-calculated project biomass	N/A - The methodology does not contain	N/A

	Steps taken by audit team to assess...		
Data/Parameter	**Accuracy of GHG emission reductions or removals**	**Whether methods/formulae set out in project description have been followed**	**Appropriateness of default values**
	for the standing dead tree parameter and confirmed that the validated parameter value was being applied correctly	methods or formulae for this parameter	
$C_{AGLT}^{[m]}$	The audit team re-calculated project biomass for the aboveground large tree parameter and confirmed that the validated parameter value was being applied correctly	The audit team cross checked the calculation against equation 44 of the methodology and confirmed that the project calculations use the appropriate formulae	N/A

In addition to the parameters set out above the audit team reviewed the project emission reductions workbook to assess the flow of data and calculations required to produce the GHG emission reductions or removals for this reporting period. In addition, the audit team reviewed all pertinent imagery against on the ground observations to test a sample of accuracy assessment ground truthing points.

The audit team confirmed the values assessed at validation had been correctly pasted into the workbook. The audit team then re-calculated the GHG emission reductions or removals using the biomass values, as well as the area for each stratum and confirmed that the project calculations were consistent with the verifier values. In conclusion, the GHG emission reductions or removals have been quantified correctly in accordance with the project description (and any subsequently validated project description deviations) and the applied methodology.

4.4.2 Quality of Evidence to Determine GHG Emission Reductions and Removals

The evidence used to determine the GHG reductions and removals was of sufficient quantity and appropriate quality. An identification of the categories of evidence used to determine the GHG emission reductions or removals, and a description of the steps taken to assess the sufficiency of quantity, and appropriateness of quality, of each category of evidence, follows.

	Steps taken by audit team to assess...		
Category	**Reliability, source, nature of evidence**	**Information flow from data generation and aggregation, to recording, calculation and final transposition into the monitoring report**	**Appropriateness of implemented calibration frequency of monitoring equipment**
Reporting workbooks	Workbooks originated from Project Personnel and were determined, after thorough testing, to be of high quality and highly reliable;	In all cases, audit team traced data contained in the monitoring report from the emission reduction workbooks back to their respective sources, which were:	N/A

	quantity of workbooks provided to audit team was sufficient	- Rukinga Carbon Model and NERs_M=4_v2 - Rukinga Deep 1m Soil Analysis - RA V2.1 - Phase I Leakage Model_M4_v1.xls	
GIS Data	All stratification and other demographic data was provided to the audit team, who confirmed that the data contained all the necessary information to recreate of the processes employed by the project and found the calculations consistent with values stated in the Project Description, Monitoring Report and applied calculations	The audit team re-calculated the total project area, as well as the area of each land class in the project area, confirming claims in the monitoring report.	N/A

Based on the information and activities described above, the audit team confirmed the evidence provided used to determine the GHG reductions and removals is of sufficient quantity, quality and is appropriate.

4.4.3 Non-Permanence Risk Analysis

The determined value of the overall risk rating has not changed since the prior verification audit. The audit team did not perform a re-assessment of the non-permanence risk analysis from first principles, but did assess the following:

- Whether any circumstances or conditions may have transpired since the prior verification audit such that the determination made by the previous verification body is no longer valid; and
- Whether items meant to address certain risks are in place and functioning as intended.

The determined value of the overall risk rating of 13% is appropriate and in conformance with the AFOLU Non-Permanence Risk Tool, to the extent that said determined value was appropriate and in conformance to the AFOLU Non-Permanence Risk Tool at the time of the prior verification audit. Finally, for instances in which there were no changes from the previous risk assessment, the audit team confirmed that the risk rating remains valid to the extent that it was valid in the first place.

4.4.3.1 Internal Risk – Project Management

Risk	Assessment of rationale, assumptions and justification	Assessment of quality of documentation and data provided	Conclusion regarding appropriateness of the risk rating
(a)	The project is a REDD/AUD AFOLU project and therefore does not rely on tree planting to generate GHG credits.	N/A	Risk rating is appropriate
(b)	The Project has previously undergone validation and verification and therefore will require protection of carbon stocks for which credits have already been issued.	N/A	Risk rating is appropriate
(c)	The audit team reviewed the work history and training of the Project Personnel and implementing partners. The audit team confirmed that the management team includes individuals with significant experience necessary undertake all project activities (i.e., any area of required experience is covered by at least one individual with at least 5 years' experience in the area).	NA	Risk rating is appropriate
(d)	Audit team worked and assessed the project in the country and in the project area and confirmed that the project management team meets this criterion.	N/A	Risk rating is appropriate
(e)	The audit team reviewed the history of the technical advisors for the project and confirmed that Wildlife Works LLC. has a long successful history of managing carbon projects from development through certification	The source is the VCS website, which more than meets the requirement for quality data	Risk rating is appropriate
(f)	The audit team assessed the adaptive management processes described throughout the CCB documentation and confirmed that the processes previously validated and verified, constitute an adaptive management plan. In addition, the audit team interviewed residents near the project area who had a firm understanding of how consultation is used to enhance the project.	The verified CCB PDD and PIR are well written and clearly define the adaptive management process.	Risk rating is appropriate

4.4.3.2 Internal Risk – Financial Viability

Risk	Assessment of rationale, assumptions and justification	Assessment of quality of documentation and data provided	Conclusion regarding appropriateness of the risk rating
(a)	-	-	N/A
(b)	-	-	N/A
(c)	-.	-	N/A

Risk	Assessment of rationale, assumptions and justification	Assessment of quality of documentation and data provided	Conclusion regarding appropriateness of the risk rating
(d)	The audit team reviewed the financial budget of the project while on site. The audit team also sampled inputs driving the model and confirmed that the future sale of credits is based on conservative estimates.	The audit team found the project cash flow budget and associated documentation neat, organized and user friendly. The project team were able to provide a clear description of the inner workings of the budget as well as record keeping.	Risk rating is appropriate
(e)	-	-	N/A
(f)	-	-	N/A
(g)	-	-	N/A
(h)	See above for assessment of rationale; as breakeven has already occurred, no cash out is required before project reaches breakeven; therefore, audit team agrees that project has inherently secured 100% of funding needed to cover total cash out before project reaches breakeven	N/A	Risk rating is appropriate
(i)	See above for assessment rationale; as breakeven has already occurred, no cash out is required before project reaches breakeven; therefore, audit team agrees that project inherently has as callable resources 100% of funding needed to cover total cash out before project reaches breakeven	N/A	Risk rating is appropriate

4.4.3.3 Opportunity Cost

Risk	Assessment of rationale, assumptions and justification	Assessment of quality of documentation and data provided	Conclusion regarding appropriateness of the risk rating
(a)	-	-	N/A
(b)	-	-	N/A
(c)	-.	-	N/A
(d)	The audit team reviewed evidence supporting the PDD and confirmed that the baseline scenario is subsistence-driven. In addition, while on site, the audit team visited communities in every district in the project area further confirming this claim. Net positive community impacts have been demonstrated (see Section 4.4.3.5 below).	The audit team reviewed the previously validated PDD and PIR and conducted numerous community interviews while on site and confirmed that the data provided is of high quality	Risk rating is appropriate
(e)	-	-	N/A
(f)	-	-	N/A
(g)	-	-	N/A

Risk	Assessment of rationale, assumptions and justification	Assessment of quality of documentation and data provided	Conclusion regarding appropriateness of the risk rating
(h)	The audit team reviewed conservation easements and confirmed that they contain language consistent with the previously verified easements bestowing the carbon rights to the project	The audit team was provided with the conservation easements and confirmed that they are required documentation for such arrangements and of high quality	Risk rating is appropriate
(i)	NA	NA	Risk rating is appropriate

4.4.3.4 External Risk – Land Tenure and Resource Access/Impacts

Risk	Assessment of rationale, assumptions and justification	Assessment of quality of documentation and data provided	Conclusion regarding appropriateness of the risk rating
(a)	The audit team reviewed the information provided in the conservation easements and while onsite interviewed members of the trust confirming that ownership and resource rights are held by the same entity	Conservation easements and trust designation documents are required documents for such activities and are considered high quality	Risk rating is appropriate
(b)	N/A	N/A	N/A
(c)	While on site, the audit team visited local districts and confirmed that the project management team has consistently and is currently working with communities to determine and mitigate any disputes that may arise over land tenure or ownership. Based on the interviews performed by the audit team no disputes exist at this time	N/A	N/A
(d)	While on site, the audit team visited local districts and confirmed that the project management team has consistently and is currently working with communities to determine and mitigate any disputes that may arise over access/use rights. Based on the interviews performed by the audit team no disputes exist at this time	N/A	N/A
(e)	N/A – the project is not a WRC project	N/A	N/A
(f)	As the rights of use contracts have not changed, the legally binding commitment to continue the management practices confirmed at validation are still in place	See item (a) above	Risk rating is appropriate
(g)	N/A	N/A	N/A

4.4.3.5 External Risk – Community Engagement

Risk	Assessment of rationale, assumptions and justification	Assessment of quality of documentation and data provided	Conclusion regarding appropriateness of the risk rating
(a)	N/A	N/A	N/A
(b)	While on site, the audit team visited multiple communities (see Section 2.5 above) in the project area who confirmed claims in the initial risk report that people living outside the project boundary are not reliant on the project area. In addition, it was obvious to the audit team that given the ownership of the group ranches comprising the region that communities outside the project area are not reliant on the project area	N/A	N/A
(c)	The project has been successfully certified under the CCB Standards and generates net positive impacts on the social and economic well-being of the local communities who derive livelihoods from the project area.	The certified CCB documentation can be considered high quality	Risk rating is appropriate

4.4.3.6 External Risk – Political Risk

Risk	Assessment of rationale, assumptions and justification	Assessment of quality of documentation and data provided	Conclusion regarding appropriateness of the risk rating
(a)	-	-	N/A
(b)	The audit team downloaded dataset from World Bank Institute's Worldwide Governance Indicators (for the most recent five years, 2013-2017, as of November 2017) and confirmed the WGI score of -0.6333	The dataset used is required by the AFOLU Non-Permanence Risk Tool, and can be considered high quality	Risk rating is appropriate
(c)	-	-	N/A
(d)	-	-	N/A
(e)	-	-	N/A
(f)	The audit team reviewed the REDD Readiness web page confirmed that Kenya is implementing REDD+ Readiness under the FCPF	The audit team considers the evidence to be the main source for confirming such information and is of high quality https://www.google.com/webhp?sourceid=chrome-instant&ion=1&espv=2&ie=UTF-8#q=redd+readiness+kenya	Risk rating is appropriate

4.4.3.7 External Risk – Natural Risk

Risk	Assessment of rationale, assumptions and justification	Assessment of quality of documentation and data provided	Conclusion regarding appropriateness of the risk rating
Fire	Given the forest types comprising the project area, the prevailing literature, and the expertise of the audit team with such, the project area forest types are highly fire adapted and are susceptible to loss of carbon stocks from natural fire due to human-created conditions. The success of the project in reducing these the burning of crop residues is sufficient for keeping the likelihood and significance of natural fire static.	The audit team reviewed the literature supporting the claims in the project risk report and confirmed that they are from peer reviewed scientific literature and therefore of high quality (see Section 2.2 of this report)	Risk rating is appropriate
Pest and Disease Outbreaks	Given the forest types comprising the project area, the prevailing literature and the expertise of the audit team with such, the project area forest types are highly resistant to pest and disease outbreaks. The audit team visited inventory plots across each district in the project area and confirmed that the species composition is consistent with the forest types listed in the PDD and therefore the risk of any changes to the ability of the forest areas to resist pest and disease outbreaks is insignificant	The audit team reviewed the literature supporting the claims in the project risk report and confirmed that they are from peer reviewed scientific literature and therefore of high quality (see Section 2.2 of this report)	N/A
Extreme Weather	No changes have occurred to the likelihood and significance of extreme weather since validation and the previous verification. The audit team is experienced working in the region and agrees that extreme weather does not pose a risk to the carbon stocks in the project area	N/A	N/A
Geological Risk	No changes have occurred to the likelihood and significance of geological events since validation and the previous verification. The audit team is experienced working in the region and agrees that geological events do not pose a risk to the carbon stocks in the project area	N/A.	N/A

In conclusion, the audit team found the risk analysis provided by the client to be accurate and well documented. The audit team agrees with the overall risk rating to be 13% as calculated according to the requirements of the AFOLU Non-Permanence Risk Tool. The total number of VCU's that should be deposited into the buffer account is 613,573 tCO2e.

4.4.4 Dissemination of Climate Monitoring Plan and Results (CL3.2)

Prior to going on site, the audit team reviewed the project monitoring report and confirmed it provides a description of the project activities utilized to disseminate the monitoring plan and results to project stakeholder. While on site, the audit team held interviews with local communities and community groups who confirmed claims in the monitoring report regarding the status of the project implementation. In addition, the audit team visited community sign boards where pertinent information about the project implementation status are posted and reviewed community meeting minutes from information meetings held by project personnel. Overall, the verification team has a high level of confidence that the dissemination of the project monitoring plan results took place in conformance with the validated PD.

4.4.5 Optional Gold Level: Climate Change Adaptation Benefits (GL1.4)

The audit team reviewed the PIR and confirmed it includes 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. The audit team reviewed the suite of literature referenced in the monitoring report and confirmed that the climate predictions of the literature are consistent with the claims in the monitoring report.

Whereas, the impacts of climate change are difficult to predict, the audit team agrees with the assessment in the monitoring report regarding the anticipation of climate change risks and the mitigation measures needed to avoid the expected risks.

In addition, the audit team reviewed the monitoring report and the referenced literature for this section and confirmed that monitoring report provides information that the 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.

Finally, the audit team reviewed the monitoring report and confirmed that it provides an adequate demonstration that the project activities will assist communities and/or biodiversity to adapt to the probable impacts of climate change. Whereas, the effects of climate change are uncertain, the audit team agrees that the mitigation and adaptive strategies provided in the PIR are appropriate for the communities and biodiversity in the project zone.

4.5 Community

4.5.1 Community Impacts (CM1.1)

Prior to going on site, the audit team reviewed the project monitoring report and confirmed it provides a description of the community impacts of the project activities. While on site, the audit team held interviews with local communities and community groups who confirmed claims in the monitoring report regarding information on the project's community impacts. In addition, the audit team visited communities where project activities are taking place, along with community members who confirmed the activities were implemented by project personnel and are providing positive benefits. Overall, the verification team has a high level of confidence that the community impacts described in the project monitoring report are accurate.

4.5.2 Net Positive Community Well-being (CM1.1)

See section 4.5.1 above.

4.5.3 Protection of High Conservation Values (CM1.2)

As the high conservation values associated with the project are highly correlated with forest conservation, the audit team reviewed claims in the monitoring report regarding avoided deforestation and degradation and confirmed the information to be sufficient to describe the effects of the project activities. In addition, the audit team re-measured and recalculated carbon stocks across the project area and confirmed the claims in the monitoring report to be accurate.

4.5.4 Other Stakeholder Impacts (CM2.2-CM2.3)

As the project design was validated as having no net impacts on other stakeholders, the audit team did not perform an assessment of impacts on first principles. While on site, the audit team did, however note that conservation agriculture techniques implemented in local communities include a training program that can be expanded to other areas. In addition, the audit team observed such techniques taking place outside of the project zone, which community members confirmed were a result of project activities. Therefore, the audit team has great confidence that any net impacts are positive.

4.5.5 Community Monitoring Plan (CM3.1, CM3.2, GL2.5)

Describe the steps taken to verify that the community impact monitoring has been carried out in accordance with the project's validated design. Include details on:

- Communities, community groups, other stakeholders, and HCVs related to community well-being identified in the monitoring plan.
- Community variables monitored.
- The dates, frequency and sampling methods used are in accordance with the validated project design.
- The results of monitoring.

For projects validated to the Gold Level for exceptional community benefits, verify that the monitoring results demonstrate:

- Both the positive and negative impacts on poorer households and individuals and other disadvantaged groups, including women.
- That community monitoring effectively identified positive and negative impacts on these individuals, households and groups.

Provide and justify an overall assessment as to whether the community monitoring plan was carried out in accordance to the validated project design.

4.5.6 Community Monitoring Plan Dissemination (CM3.3)

Prior to going on site, the audit team reviewed the project monitoring report and confirmed it provides a description of the project activities utilized to disseminate the monitoring plan and results to project stakeholders. While on site, the audit team held interviews with local communities and community groups who confirmed claims in the monitoring report regarding the status of the project implementation. In addition, the audit team visited community sign boards where pertinent information about the project implementation status are posted and reviewed community meeting minutes from information meetings

held by project personnel. Overall, the verification team has a high level of confidence that the dissemination of the project monitoring plan results took place in conformance with the validated PD.

4.5.7 Optional Gold Level: Barriers to Benefits (GL2.3)

This section is not applicable to the project.

4.5.8 Optional Gold Level: Protections for Poorer and the more Vulnerable (GL2.4)

This section is not applicable to the project.

4.6 Biodiversity

4.6.1 Biodiversity Changes (B1.1)

As the biodiversity benefits associated with the project are highly correlated with forest conservation, the audit team reviewed claims in the monitoring report regarding avoided deforestation and degradation and confirmed the information to be sufficient to describe the effects of the project activities. In addition, the audit team reviewed the biodiversity monitoring records and confirmed that the monitoring of biodiversity is taking place as described in the validated PD.

4.6.2 High Conservation Values Protected (B1.2)

As the high conservation values associated with the project are highly correlated with forest conservation, the audit team reviewed claims in the monitoring report regarding avoided deforestation and degradation and confirmed the information to be sufficient to describe the effects of the project activities. In addition, the audit team re-measured and recalculated carbon stocks across the project area and confirmed the claims in the monitoring report to be accurate

4.6.3 Invasive Species (B1.3)

The audit team reviewed the activities implemented by the project and confirmed that the project do not include the introduction of any known invasive species. While the project does promote the practice of conservation agriculture, the project does not include the introduction of known invasive species. In addition, the project activities include protecting existing forest, but does not introduce new species to the existing forest native forests. The few species that have been introduced are well known to the audit team and are used throughout east Africa and have been for more than a decade. The audit has observed mature species of each in the project area and in no case observed any natural regeneration of such. Based on these activities, the audit team confirms that no invasive species have been introduced by the project.

4.6.4 Impacts of Non-native Species (B1.4)

See section 4.6.3 above.

4.6.5 GMO Exclusion (B1.5)

The audit team reviewed the activities implemented by the project and confirmed that the project do not include the introduction of any species. While the project does promote the practice of conservation agriculture, the project does not include the introduction of species. In addition, the project activities include protecting existing forest, but does not introduce new species to the existing native forests. Based on these activities, the audit team confirms that no GMO's are included in the project and thus the project does not generate any GHG emission reductions through the use of GMO's.

4.6.6 Negative Offsite Biodiversity Impacts and Mitigation (B2.2)

As forest protection is unlikely to have negative effects on biodiversity, no negative impacts are expected.

4.6.7 Net Biodiversity Benefits (B2.3)

See section 4.6.1 and 4.6.6 above. Given that no negative impacts on biodiversity (either inside or outside the project zone) have occurred, the net biodiversity benefits are clearly positive.

4.6.8 Biodiversity Monitoring Results (B3.1, B3.2)

Prior to the site visit the audit team reviewed the project monitoring report and confirmed that the language regarding biodiversity monitoring remains unchanged. In addition, while on site the audit team reviewed biodiversity monitoring records held at the WW headquarters and confirmed that the variables monitored include the dates, frequency, biodiversity variables and sampling methods used are in accordance with the validated project design, and demonstrate the effectiveness of measures taken to maintain or enhance all identified high conservation values identified in the monitoring plan. Finally, while the effect of the project on biodiversity is difficult to assess in the short term, biodiversity in the project is highly correlated with habitat protection. Based on the success of the project in protecting vital habitat, the audit team confirms the claims in the monitoring report regarding biodiversity results to be accurate. Based on the activities described above, the audit team confirms that the biodiversity monitoring plan was carried out in accordance to the validated project design.

4.6.9 Biodiversity Monitoring Plan Dissemination (B3.3)

Prior to going on site, the audit team reviewed the project monitoring report and confirmed it provides a description of the project activities utilized to disseminate the monitoring plan and results to project stakeholder. While on site, the audit team held interviews with local communities and community groups who confirmed claims in the monitoring report regarding the status of the project implementation. In addition, the audit team visited community sign boards where pertinent information about the project implementation status are posted and reviewed community meeting minutes from information meetings held by project personnel. Overall, the verification team has a high level of confidence that the dissemination of the project monitoring plan results took place in conformance with the validated PD.

4.7 Additional Project Implementation Information

No additional project information was assessed during this verification event.

4.8 Additional Project Impact Information

No additional project information was assessed during this verification event.

5 VERIFICATION CONCLUSION

The audit team asserts that:

- The project complies with the verification criteria for projects GHG emission reductions or removals set out in VCS Version 3 and CCB Version 2.
- The project has been implemented in accordance with the project description and subsequently validated variations.

- To the extent that the verification engagement described in this report has included validation activities, the project complies with the validation criteria for projects set out in CCB Version 2 and VCS Version 3.

The first and second of the above bullet-pointed statements are made without qualification or limitation. The third of the above bullet-pointed statements is limited to those aspects of the project specifically assessed by the audit team as part of validation activities undertaken as a part of the verification engagement described in this report.

The audit team has thoroughly reviewed the project documentation, results of monitoring, and performed a suite of onsite activities, in which the team was able to confirm the validity of the net positive climate change adaptive capacity and resilience (if any), community and biodiversity benefits achieved by the project during the project implementation period and whether the project has achieved.

Verification/monitoring period: From 01 January 2015 – 31 December 2017

Verified GHG emission reductions and removals in the above verification period:

Year	Baseline emissions or removals (tCO_2e)	Project emissions or removals (tCO_2e)	Leakage emissions (tCO_2e)	Net GHG emission reductions or removals (tCO_2e)
2015	263,855	0	0	263,855
2016	255,298	0	0	255,298
2017	255,141	0	0	255,141
Total	774,295	0	0	774,295

APPENDIX A: VERIFICATION FINDINGS

Please see Section 2.6 above for a description of the findings issuance process and the categories of findings issued. It should be noted that all language under "Project Personnel Response" is a verbatim transcription of responses provided to the findings by project personnel. Note that, because the verification engagement described in this report and the verification engagement in respect of the "Kasigau Corridor REDD+ Project Phase II – The Community Ranches" project took place concurrently, the verification findings included below address both engagements.

NCR 1 Dated 26 Jun 2018
Standard Reference: VCS Standard v3.7 section 3.16.6
Document Reference: Kasigau Corridor PI_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.1 (Title page)
Kasigau Corridor PII_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.2 (Title page)
Finding: The VCS Standard states "The monitoring report describes all the data and information related to the monitoring of GHG emission reductions or removals. The project proponent shall use the VCS Monitoring Report Template, VCS Joint Project Description & Monitoring Report Template, VCS & CCB Monitoring Report Template or VCS+SOCIALCARBON Monitoring Report Template, as appropriate, and adhere to all instructional text within the template."
In addition the VCS/CCB monitoring report template requires that the organization and contact name with email address and phone number for the Validation/Verification body performing the assessment be included.
In review of the project monitoring reports the verification team noted that no information is listed in this section and therefore is not in conformance with the standard.
Project Personnel Response: We have corrected the MR document to include the name and contact information for the verification body.
Auditor Response: The verification team reviewed the updated monitoring report and confirmed that the required information has been provided.

NCR 2 Dated 26 Jun 2018
Standard Reference: VCS Standard v3.7 section 3.16.6
Document Reference: Kasigau Corridor PI_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.1 (Title page)
Kasigau Corridor PII_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.2 (Title page)
Finding: The VCS Standard states "The monitoring report describes all the data and information related to the monitoring of GHG emission reductions or removals. The project proponent shall use the VCS Monitoring Report Template, VCS Joint Project Description & Monitoring Report Template, VCS & CCB Monitoring Report Template or VCS+SOCIALCARBON Monitoring Report Template, as appropriate, and adhere to all instructional text within the template."
In addition the VCS/CCB monitoring report template requires the project proponent list which Gold Level criteria are being used and provide a brief description of the activities implemented and results achieved that enable the project to qualify for each relevant Gold Level.
In review of the project moonitoring reports it is clear that a rationale for why the project is eligible to claim the exceptional biodiversity benefits and would fully meet the requirements of the template if this were an initial validation event. Given that this is a verification assessment, however the project proponents will need to describe the activities implemented and results achieved that enable the project to qualify for Gold Level. Since no information is provided with respect to the activities implemented and results, the project is not in conformance with the standard.
Project Personnel Response: We have revised the MR coverpage Gold Level Criteria to include information on the activities implemented and how these provide exceptional biodiversity benefits, making the project eligible for the gold level. Please view the coverpage of the MR submitted with these responses to the findings.
Auditor Response: The verification team reviewed the updated monitoring report and confirmed that the required information regarding the gold level results has been provided.

NCR 3 Dated 26 Jun 2018
Standard Reference: VCS Standard v3.7 section 3.16.6
Document Reference: Kasigau Corridor PI_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.1 Section 1.2
Kasigau Corridor PII_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.2 Section 1.2
Finding: The VCS Standard states "The monitoring report describes all the data and information related to the monitoring of GHG emission reductions or removals. The project proponent shall use the VCS Monitoring Report Template, VCS Joint Project Description & Monitoring Report Template, VCS & CCB Monitoring Report Template or VCS+SOCIALCARBON Monitoring Report Template, as appropriate, and adhere to all instructional text within the template."
In addition, the monitoring report template states "For each metric, quantify the net benefit the project has achieved during the monitoring period covered by this report and since the project start date (if this is the project's first verification report, the two columns will be the same). Insert "not applicable" where the metric does not apply and "data not available" where the metric does apply but there are no means of quantification. Data included in the monitoring period column shall be substantiated in this document as denoted by the corresponding section reference."
In review of the project monitoring reports, the verification team noted that for the forest cover requirement the project proponents claim that this is not applicable as the project baseline model does not calculate hectares. Whereas the verification team understands that the project is not applying a baseline type that requires spatial modelling, the project does monitor changes in forest cover hectares for extrapolating emission values to the project level from the strata level. Given that this metric is indded required to accurately report GHG emission reductions and this has not been included in the table provided in section 1.2 of the montitoring report, the project is not in conformance with the standard.
Project Personnel Response: Although, as the auditor notes the Project does monitor any changes in the forest extent of the Project Area, as detailed in the carbon monitoring plan and the disturbance monitoring plan, this does not provide the information that is being requested in this metric. The guidance for the metric referenced by the auditor asks "For REDD projects: Number of hectares of reduced forest loss in the project area measured against the without-project scenario." This project utilizes the VCS methodology VM0009 v1, which utilizes the Cumulative Deforestation Model. This is an emissions-based model that estimates the proportion of the carbon stock in the Project Area that has been avoided from being emitted due to deforestation at any given point in the project lifetime in comparison to the baseline scenario. Therefore, we cannot estimate a reduced area of deforestation during the monitoring period, nor to date in the project. As the auditor notes, we do continually monitor the Project Area for cases of disturbances, natural or anthropogenic, that result in forest loss, this is not related to the determination of the Project's baseline, nor provides a manner with which the Project could determine the number of hectares of forest that the Project has protected from deforestation in comparison to the Project's baseline scenario. However, the Project was incorrect in its response to this metric when saying "Not Applicable," and instead should have listed this metric as "Data not Available," as this metric does apply to the project, but there is no means of quantifying it. Please see the revised MR that has been provided to the auditor along with these response to the findings to see this change.
Auditor Response: After reviewing the project response and cross checking against the requirements of the methodology, the verification team agrees that the data necessary to complete this section of the monitoring report is not available when using the baseline emissions model of quantifying GHG emission reductions. Given, the absence of such data, the verification team agrees that the monitoring report has been completed in conformance with the template with respect to this requirement.

NCR 4 Dated 26 Jun 2018
Standard Reference: VCS Standard v3.7 section 3.16.6
Document Reference: Kasigau Corridor PI_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.1 Section 2.1.1
Kasigau Corridor PII_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.2 Section 2.1.1
Finding: The VCS Standard states "The monitoring report describes all the data and information related to the monitoring of GHG emission reductions or removals. The project proponent shall use the VCS Monitoring Report Template, VCS Joint Project Description & Monitoring Report Template, VCS & CCB Monitoring Report Template or VCS+SOCIALCARBON Monitoring Report Template, as appropriate, and adhere to all instructional text within the template."
n addition the monitoring report template states "Provide a description of the implementation status of the project, including the following (no more than one page):
• 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..."
In review of the project monitoring report the verification team noted that the information provided is well in excess of one page and therefore is not in conformance with the standard.

Project Personnel Response: The MR has been corrected so that section 2.1 is not in excess of 1 while still providing the required information. The additional information on the implementation of project activities has been moved to section 4.3.2.
Auditor Response: As stated in the project response, the project has amended the monitoring report the ensure section 2.1 is no longer in excess of one page.

NCR 5 Dated 26 Jun 2018
Standard Reference: VCS Standard v3.7 section 3.16.6
VCS Standard v3.7 section 3.6
Document Reference: Kasigau Corridor PI_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.1 Section 2.2.4
Kasigau Corridor PII_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.2 Section 2.2.4
Finding: The VCS Standard states "The monitoring report describes all the data and information related to the monitoring of GHG emission reductions or removals. The project proponent shall use the VCS Monitoring Report Template, VCS Joint Project Description & Monitoring Report Template, VCS & CCB Monitoring Report Template or VCS+SOCIALCARBON Monitoring Report Template, as appropriate, and adhere to all instructional text within the template."
According to the project monitoring plan for disturbances the language states that "Accounting of Disturbances If a disturbance is determined to be significant according to the criteria listed above, the project proponent shall do the following:
a) Delineate a new stratum for the disturbed area. This delineation can be performed in the field using a GPS or using a remote sensing product.
b) Install plots and re-measure above- and below-ground biomass.
c) Determine new project area carbon stocks with the new stratum included."
During the site visit, however it was reported that areas two areas disturbed during the monitoring period were moved to a non-forest strata and that no new biomass plots were installed. Given that this deviation is not included in the monitoring report, the project is not in conformance with the standards.

Project Personnel Response: As a part of the Project's adaptive management we are always looking for ways to improve the Project's procedures and protocols. As noted by the auditor, we have revised the disturbance monitoring procedures to incorporate new techniques and methods. We have revised the MR to include in section 2.2.3 a description of the PD deviation that was made in respect to the changes in the disturbance monitoring SOP.
Auditor Response: The verification team reviewed the updated monitoring report and confirmed that the description of the monitoring deviation has been appropriately included.

NCR 6 Dated 26 Jun 2018
Standard Reference: VCS Standard v3.7 section 3.16.6
VCS Standard v3.7 section 3.6
Document Reference: Kasigau Corridor PI_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.1 Section 2.2.4
Kasigau Corridor PII_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.2 Section 2.2.4
Finding: The VCS Standard states "The monitoring report describes all the data and information related to the monitoring of GHG emission reductions or removals. The project proponent shall use the VCS Monitoring Report Template, VCS Joint Project Description & Monitoring Report Template, VCS & CCB Monitoring Report Template or VCS+SOCIALCARBON Monitoring Report Template, as appropriate, and adhere to all instructional text within the template."
In review of the project standard operating procedures for soil sampling and observations during the site visit, it is obvious that the original sampling methods have been altered prior to the current soil sampling effort. Whereas, the verification team sees no issues regarding the new methodology, this has not been included as a project description deviation in the project MR and therefore is not in conformance with the standards.
Project Personnel Response: As a part of the Project's adaptive management we are always looking for ways to improve the Project's procedures and protocols. As noted by the auditor, we have revised the Project's soil sampling SOP to incorporate new techniques and methods that will improve the quality of the data, reduce the potential for error and ensure repeatability. We have revised the MR to include in section 2.2.3 a description of the PD deviation that was made in respect to the changes in the soil sampling SOP.
Auditor Response: The verification team reviewed the updated monitoring report and confirmed that the description of the monitoring deviation has been appropriately included.

NCR 7 Dated 26 Jun 2018
Standard Reference: VCS Standard v3.7 section 3.16.6
Document Reference: Kasigau Corridor PI_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.1 Section 2.4.2
Kasigau Corridor PII_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.2 Section 2.4.2
Finding: The VCS Standard states "The monitoring report describes all the data and information related to the monitoring of GHG emission reductions or removals. The project proponent shall use the VCS Monitoring Report Template, VCS Joint Project Description & Monitoring Report Template, VCS & CCB Monitoring Report Template or VCS+SOCIALCARBON Monitoring Report Template, as appropriate, and adhere to all instructional text within the template."
Additionally, Section 2.4.2 of the template states "Describe activities and/or processes implemented during the monitoring period to provide orientation and training for the project's workers and a wide range of people from the communities. Explain how, once it has been built, local capacity is not lost. "
In review of the project monitoring reports the verification team noted that Section 2.4.2 of the monitoring reports does not provide information on how "once it has been built, local capacity is not lost and therefore is not in conformance with the standard.
Project Personnel Response: We have updated the MR to include this required information. Please see the revised MR that has been provided to the auditor along with the responses to these findings.
Auditor Response: The verification team reviewed the amended monitoring report and confirmed that project personnel have included adequate information, as described in this finding.

NIR 8 Dated 26 Jun 2018
Standard Reference: VCS Standard v3.7 section 3.16.6
CCB Standards Second Edition Sec. G4.4
Document Reference: Kasigau Corridor PI_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.1 Section 2.4.3
Kasigau Corridor PII_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.2 Section 2.4.3
Finding: The VCS Standard states "The monitoring report describes all the data and information related to the monitoring of GHG emission reductions or removals. The project proponent shall use the VCS Monitoring Report Template, VCS Joint Project Description & Monitoring Report Template, VCS & CCB Monitoring Report Template or VCS+SOCIALCARBON Monitoring Report Template, as appropriate, and adhere to all instructional text within the template."
In addition, sec 2.4.3 of the template and sec G4.4 of the standards require that the project proponent(s) "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. Where relevant, describe the activities and/or processes implemented to ensure community members, including women and vulnerable and/or marginalized people, were given a fair chance to fill positions for which they can be trained."
Whereas, the verification team was able to confirm conformance to the indicator during on site activities, the requirement of the template is to demonstrate within the cover of the monitoring report. At this point the verification team is unable to discern such a demonstration from the language provided in the reports.
Project Personnel Response: We have revised the MR to include more detail on the Project's hiring policies and practices to meet the requirements to demonstrate compliance with the listed rules. Please see the revised MR that has been provided to the auditor along with the responses to the findings.
Auditor Response: The verification team reviewed the amended monitoring report and confirmed that adequate information regarding project employment practices have been included and are consistent with information gleaned from community interviews.

NCR 9 Dated 26 Jun 2018
Standard Reference: VCS Standard v3.7 section 3.16.6
CCB Standards Second Edition Sec. G4.5
Document Reference: Kasigau Corridor PI_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.1 Section 2.4.5
Kasigau Corridor PII_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.2 Section 2.4.5
Finding: The VCS Standard states "The monitoring report describes all the data and information related to the monitoring of GHG emission reductions or removals. The project proponent shall use the VCS Monitoring Report Template, VCS Joint Project Description & Monitoring Report Template, VCS & CCB Monitoring Report Template or VCS+SOCIALCARBON Monitoring Report Template, as appropriate, and adhere to all instructional text within the template."
Additionally, the template and section G4.5 of the standards require that you assess risks to worker safety and describe activities or processes to inform workers of the risks and to show how risks are minimized.
Whereas the monitoring report provides a lot of information regarding this indicator, there is no information regarding risks to the biomass team.
While on site the verification team noted a few conditions in which safety issues arose and no activities were in place to minimize such risks and therefore is not in conformance with the standards.
Project Personnel Response: We have revised the MR to include information regarding risks to the plot sampling team. Please refer to the MR section 2.4.5 for CCB indicator 4.6 with a list of each of the risks to the safety of the plot teams while performing the duties of their job.
Auditor Response: The verification team reviewed the amended monitoring report and confirmed that it now included information describing risks associated with the soil sampling.

NIR 10 Dated 26 Jun 2018
Standard Reference: VCS Standard v3.7 section 3.16.6
Document Reference: Kasigau Corridor PI_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.1 Section 3.1.3
Kasigau Corridor PII_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.2 Section 3.1.3
Finding: This finding is in reference to findings 5 and 6 above. Given the deviations from the original monitoring plan, the current monitoring plan does not accurately describe the monitoring procedures for soil and disturbance monitoring.
Project Personnel Response: We have revised the Project's Disturbance Monitoring Plan to include the new procedures that have been developed and use. We have provided this updated plan to the auditor along with these responses to the findings.
Auditor Response: The verification team reviewed the updated disturbance monitoring plan and confirmed that the plan now accurately describes how disturbance monitoring is being implemented during the monitoring period.

NIR 11 Dated 26 Jun 2018
Standard Reference: N/A
Document Reference: N/A
Finding: The verification team received comments from Verra that were submitted via the website. Also, there were a number of comments received ny the verification team during the site visit (comments provided outside the cover of this workbook). Please provide responses to the comments submitted.
Project Personnel Response: We have provided the auditor with our responses to the these comments outside of this workbook.
Auditor Response: As stated in the project response, comments received during the public comment period have been addressed. Comments that were construed as grievances were assessed against the validated grievance redress procedures of the project. Comments received are further described in the appropriate section of the verification report.

NCR 12 Dated 26 Jun 2018
Standard Reference: VCS Standard v3.7 section 3.16.6
Document Reference: Kasigau Corridor PI_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.1 Section 3.1.3
Kasigau Corridor PII_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.2 Section 3.1.3
Finding: The VCS Standard states "The monitoring report describes all the data and information related to the monitoring of GHG emission reductions or removals. The project proponent shall use the VCS Monitoring Report Template, VCS Joint Project Description & Monitoring Report Template, VCS & CCB Monitoring Report Template or VCS+SOCIALCARBON Monitoring Report Template, as appropriate, and adhere to all instructional text within the template."
Additionally, the template states "All sections must be completed using Arial 10pt, black, regular (non-italic) font, unless deviations are merited. Where a section is not applicable, same must be stated under the section (the section must not be deleted from the final document unless instruction specifically state so). "
In review of the project monitoring report the verification team noted that for section 3.3.1 the monitoring report has the heading as "Demonstrate that current or anticipated climate changes are having or are likely to have an impact on the well-being of communities and/or biodiversity in the project zone (GL1.3.)", however the template has the heading as "3.3.1 Activities and/or Processes Implemented for Adaptation (GL1.4)."
This also affects the subsequent headings as well and therefore is not in conformance with the standard.
Project Personnel Response: We have corrected the template to remove the heading listed above and have added the correct heading for section 3.3.1 according to the VCS/CCB template.
Auditor Response: As stated in the project response, the template section headings have been corrected in the updated monitoring report to meet the requirements of the template.

NCR 13 Dated 26 Jun 2018
Standard Reference: VCS Standard v3.7 section 3.16.7
Document Reference: Kasigau Corridor PI_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.1 Section 4.4
Kasigau Corridor PII_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.2 Section 4.4
Finding: The VCS Standard states "The monitoring report describes all the data and information related to the monitoring of GHG emission reductions or removals. The project proponent shall use the VCS Monitoring Report Template, VCS Joint Project Description & Monitoring Report Template, VCS & CCB Monitoring Report Template or VCS+SOCIALCARBON Monitoring Report Template, as appropriate, and adhere to all instructional text within the template."
Additionally, the template states "All sections must be completed using Arial 10pt, black, regular (non-italic) font, unless deviations are merited. Where a section is not applicable, same must be stated under the section (the section must not be deleted from the final document unless instruction specifically state so). "
In review of the project monitoring reports the verification team noted that section 4.4.1 and 4.4.2 do not follow the guidance referenced above and therefore are not in conformance with the standard.
Project Personnel Response: We have corrected the MR template to be in accordance with the template requirements listed above.
Auditor Response: As stated in the project response, sections 4.4.1 and 4.4.2 have been corrected in the updated monitoring report to meet the requirements of the template.

NIR 14 Dated 26 Jun 2018
Standard Reference: VCS Standard v3.7 section 3.16.7
Document Reference: Kasigau Corridor PI_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.1 Section 5.1.1.1
Kasigau Corridor PII_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.2 Section 5.1.1.1
Finding: The VCS Standard states "The monitoring report describes all the data and information related to the monitoring of GHG emission reductions or removals. The project proponent shall use the VCS Monitoring Report Template, VCS Joint Project Description & Monitoring Report Template, VCS & CCB Monitoring Report Template or VCS+SOCIALCARBON Monitoring Report Template, as appropriate, and adhere to all instructional text within the template."
In addition, the template text for this section states "Describe all the changes in and impacts to biodiversity resulting from project activities under the with-project scenario in the project zone during this monitoring period."
In review of the project monitoring reports the verification team noted that the information provided in section 5.1.1.1 does not describe the changes in and impacts to biodiversity resulting from project activities under the with-project scenario.
During the office portion of the site visit the verification team held discussions with Dr. Mwangi Githiru, who explained the difficulties describing changes and impacts to large and often transient wildlife included in the biodiversity monitoring plan. The verification team agreed with the assertion and the rationale for not including quantitative data regarding wildlife given the limited temporal scale of monitoring.
The CCB Standards provide guidance to address just this situation, as was also discussed during the site visit.
Footnote 49 of the standards state "Potential variables may include but are not limited to: species abundance; population size, range, trends and diversity; habitat area, quality and diversity; landscape connectivity; and forest fragmentation."
Given that other variables, such as habitat area, landscape connectivity, and forest fragmentation are monitored to some extent, changes and impacts can be reported for this indicator.
Project Personnel Response: We have revised the MR, adding more information on the impacts and benefits that the Project has had during the monitoring period. This new text has been added to section 5.1.1.1. Please see the revised MR that has been provided to the auditor along with these responses to the findings.
Auditor Response: The verification team reviewed the updated monitoring report and confirmed that the project has adequately described the results of the project biodiversity benefits. The verification team also confirmed that using the cause and affect logic as described in the monitoring report has been appropriately understood and followed.

NCR 15 Dated 26 Jun 2018
Standard Reference: AFOLU Non-Permanence Risk Tool v3.3 Sec 2.1.2
Document Reference: VCS Non-Permanence Risk Report Kasigau I_M5_v1 Financial Viabilty (i)
VCS Non-Permanence Risk Report Kasigau II_M5_v1 Financial Viability (i)
Finding: The AFOLU risk tool states "Where applicable, and the project proponent demonstrates that related mitigation activities will be (at validation) or are being (at verification) applied, the risk rating for the sub-category will be reduced, as determined in Sections 2.2 to 2.4."
In review of the project NPRR, the verification team noted that the project is claiming a mitigation score for item (i). Given that the project has already reached breakeven, the mitigation score is not applicable to the project and therefore is not in conformance with the requirements of the tool.

Project Personnel Response: We have corrected the Project's non-permanence risk report to remove this mitigation. Please see the revised non-permanence risk report provided to the auditor along with these responses to the findings.
Auditor Response: The verification team has reviewed the updated risk report and confirmed that only applicable mitigation risk scores have been considered.

NCR 16 Dated 26 Jun 2018
Standard Reference: AFOLU Non-Permanence Risk Tool v3.3 Sec 2.1.2
Document Reference: VCS Non-Permanence Risk Report Kasigau I_M5_v1 Financial Viability (i) VCS Non-Permanence Risk Report Kasigau II_M5_v1 Financial Viability (i)
Finding: The AFOLU risk tool states "As set out in Sections 2.2 to 2.4, some sub-category tables allow the sub-category risk rating to be a number lower than zero, specifically where mitigation activities in the sub-category have the potential to reduce risks in other sub-categories. Where risk mitigation synergies do not exist, the tables set a minimum rating of zero, even in cases where the calculation would otherwise determine a rating lower than zero."
Given that the project NPRR includes a (-2) for the subcategory total and the subcategory in the template states "Total may not be less than zero." the project is not in conformance with the requirements of the tool.
Project Personnel Response: We unsure as to what specific section of the non-permanence risk tool the auditor is referring to, as all sections are in compliance with VCS guidance. Section 2.2.3 shows a negative score, however VCS guidance v.3.3 says that the total for this table can be less than 0. Other sections where VCS guidance stated that the risk score could not be less than 0 are all in compliance as well, with all having a score of 0 or greater. In some sections where the individual metrics of the table sum to less than 0, this was noted in the total line, next to the risk score of 0. Although this did not make the Project's non-permanence tool out of compliance, we have removed these notes from the tool, so that the total line now only displays the Project's risk score.
Auditor Response: The verification team has reviewed the updated risk report and confirmed the rules of the template have been followed. In addition, the verification team realize that the initial interpretation of the score was incorrect, however appreciate the update to avoid confusion to readers.

NIR 17 Dated 26 Jun 2018
Standard Reference: CCB Standards Second Edition G3.10
Document Reference: N/A
Finding: The standards state the project proponents must "Formalize a clear process for handling unresolved conflicts and grievances that arise during project planning and implementation… 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."
During the site visit the verification team was made aware of an outstanding grievance that was raised by the biomass team. In order to assess the issue to determine conformance with this indicator, the verification team requests all correspondence and associated documentation (specifics of documentation will be discussed outside the cover of this workbook for now).
Project Personnel Response: Our response to this finding has occurred outside of this findings workbook. We have provided the auditor with information regarding the resolution of this grievance with the plot samplers and held a video call between the auditor and the plot team to discuss the grievance and its resolution.
Auditor Response: The verification team held interviews on site and reviewed grievance records at the WW offices in Rukinga. In addition, the verification team held interviews via Skype with individuals who lodged the grievance and confirmed that project personnel have appropriately used the project grievance procedures to attempt to resolve the issue.

OBS 18 Dated 26 Jun 2018
Standard Reference: VCS Standard v3.7 Sect 2.4.1
Document Reference: N/A
Finding: The VCS Standard defines the principles of accuracy and consistency as "Reduce bias and uncertainties as far as is practical" and "Enable meaningful comparisons in GHG-related information" respectively.
During the site visit the soil sampling team were using known volumes of water to displace space in sample areas in order to calculate bulk density values. In doing so the measured water was sometimes left in the sun while soil excavation was still taking place. Given the ambient temperatures at the time, there is risk that some of the water may have evaporated, thus introducing the possibility of confounding results. It is important to note that this was not a consistent practice and the verification team is not claiming bias in this instance, however should this practice become systematic in the future there is potential for the possibility of material error in the future. This finding is closed upon issuance.

NCR 18 Dated 24 Aug 2018
Standard Reference: VCS Standard v3.7 section 3.16.6
Document Reference: KAE3CB~1; KA27D8~1
Finding: The VCS Standard states "The monitoring report describes all the data and information related to the monitoring of GHG emission reductions or removals. The project proponent shall use the VCS Monitoring Report Template, VCS Joint Project Description & Monitoring Report Template, VCS & CCB Monitoring Report Template or VCS+SOCIALCARBON Monitoring Report Template, as appropriate, and adhere to all instructional text within the template."
During the course of final review, the audit team identified the following areas in which the monitoring reports did not adhere to all instructional text within the VCS & CCB Monitoring Report Template.
1. The values reported under “Net NERs” and “Net GHG emission reductions and removals” in Tables 6 and 7, respectively, were not the result of the calculation as required by Equation 34 of the methodology.
2. The “Buffer tonnes to VCS” in Table 2 were not the result of multiplication of the result of Equation 34 by the 13% risk rating.
3. There was a deviation to the schedule for baseline re-evaluation as set out in Section 5.2 of the VCS PD, but this was not described as such following the guidance text in Section 2.2.4 of the Template (this issue was specific to the Phase I project monitoring report).
Project Personnel Response: [A response to this finding was provided outside the cover of the findings workbook.]
Auditor Response: This is a place-holder finding to identify issues conveyed to the project proponent in email form. The resolution to the issues identified above was for revised versions of the monitoring reports to be provided responsive to these issues identified above. The process for resolution was an iterative one, but all issues were finally resolved in the versions of the monitoring reports entitled “Kasigau Corridor PI_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.5” and “Kasigau Corridor PII_M5_Monitoring_Report_CCB v2.0_VCSv3.4_V1.7”.

APPENDIX B: MARKET LEAKAGE ASSESSMENT

In accordance with Section 3.6.4 of the AFOLU Requirements, the quantity of market leakage caused by the project was assessed at verification. The information upon which the market leakage assessment was based is contained within the methodology. The market leakage assessment findings and conclusion are as follows.

The market leakage assessment findings and conclusion are as follows.

The total quantity of market leakage emissions is estimated to be 0 tCO_2e over the monitoring period (see also Section 5 above). The audit team has concluded that the reporting of market leakage emissions is in conformance with the VCS rules and the methodology.