FINAL CCBA PROJECT VERIFICATION REPORT

'KASIGAU CORRIDOR PHASE I REDD+ PROJECT – RUKINGA SANCTUARY

4 SEPTEMBER 2015

Assessment Conducted by:

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Introduction

This report presents the findings of an audit conducted by SCS Global Services (SCS), to validate the claim made by Wildlife Works Carbon LLC that the Kasigau Corridor Phase I REDD+ Project – Rukinga Sanctuary conforms to the Climate, Community and Biodiversity (CCB) Project Design Standards (Second Edition). SCS has been accredited by the Climate, Community & Biodiversity Alliance (CCBA) to perform such verification audits.

Objective

The verification objective was an independent assessment by SCS of the proposed project activity against all defined criteria as defined by the CCBA. The verification resulted in a conclusion by SCS as to whether the project activity was compliant with the CCB standards and whether the project should be submitted for registration with CCBA. The ultimate decision on the registration of a proposed project activity rests with CCBA.

Scope and Criteria

The scope of the audit consisted of the project, its activities, and its geographic extent, as described within the Project Implementation Report (PIR). The assessment was conducted against the criteria set out within the following guidance documents:

- Climate, Community and Biodiversity Project Design Standards, Second Edition, December 2008 ("CCB Standards"),
- Rules for the Use of the Climate, Community & Biodiversity Standards, Version 3

The project was assessed against all required criteria of the CCB Standards in order to determine whether the project could be validated at the "Approved" level. In addition, the project was assessed against at least one optional criterion, as set out by the CCB Standards, in order to determine whether the project could be validated at the "Gold" level.

Project Description

The Kasigau Corridor Phase I REDD+ Project – Rukinga Sanctuary is located in the Taita Taveta County, Coast Province, Kenya and is aimed at provided net positive climate, community, biodiversity benefits.

Verification Process

Method

The verification was performed through a combination of document review, interviews with relevant personnel and on-site inspections. At all times, the project was assessed for conformance to the criteria described in the 'Interviews' section of this report. As discussed in the 'Resolution of Discrepancies' section of this report, findings were issued to ensure that the project was in full conformance with all requirements.

Document Review

The PIR and supporting documentation were carefully reviewed for conformance to the verification criteria. In addition to the PIR, the following written documents (e.g., reports, memos, land deeds and titles) were reviewed to ensure conformance of the project with the verification criteria:

Table 1 Documents Reviewed

Document	File Name
Project Description	PROJ_DESC_562_25JAN2011.pdf
Initial monitoring report	MONIT_REP_562_01JAN2012_31DEC2012.pdf
Risk report	VCS Non-Permanence Risk Report Kasigau I_M4.v1
Leakage calculations	Phase I Leakage Model_M4_v1.xls
CCB PDD	Project Design Document – 9 Sept 2009
Initial CCB monitoring plan	Monitoring Plan – 9 Sept 2009
Latest CCB PIR	Project Implementation Report 10 December 2014
Soil Calculations	Rukinga Deep 1m Soil Analysis - RA V2.1

GHG calculations	Rukinga Carbon Model and NERs_M=4_v2
Disturbance monitoring procedures	Standard Operating Procedure - Disturbance Monitoring - v1.0_2012-10-02
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 M4 v1
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 Marungu CBO_signed

Interviews

Interviews constituted an important component of the audit process. The following personnel associated with the project proponent and/or implementing partner were interviewed. The phrase "throughout audit" under "Date Interviewed" indicates that the individual in question was interviewed on multiple occasions throughout the audit process.

Table 2 Interviews Conducted with Project Personnel

Individual	Affiliation	Role	Date(s) Interviewed
Jeremy Freund	Wildlife Works LLC. (WW)	VP Carbon Development	Throughout Audit
Simon Bird	WW	Carbon Development	Throughout Audit
Cara Braund	WW	Office Manager	15-20 December 2014
Janie Hendriksen	WW	Director of regional Operations	15-20 December 2014

Rob Dodson	WW	Vice President of Africa Field Operations	15-20 December 2014
Laurian Lenjo	WW	Community Relations Manager	15-20 December 2014
Mwangi Githiru	WW	Biodiversity and Community Monitoring	15-20 December 2014
Nicholas Aguili	WW	Human resources Manager	15-20 December 2014
Philip Huo Njorge	WW	Finance Manager	15-20 December 2014
Joash Nyamdiena	WW	Community Trusts Auditor	15-20 December 2014
Eric Sagwe	WW	Head Wildlife Ranger	15-20 December 2014
Muasa Mwololo	WW	Biomass Team Supervisor	15-20 December 2014
Joshua Kitiro	WW	Biomass Team Leader	15-20 December 2014
Mathias Kakoi	WW	Biomass Team Leader	15-20 December 2014
Moses Mamodo	WW	Biomass Team Leader	15-20 December 2014
Cyprian Midaidasi	WW	Biomass Team Leader	15-20 December 2014
Darius Mkala	WW	Biomass Team Member	15-20 December 2014

Benjamin Ndolo	WW	Biomass Team Member	15-20 December 2014
Soloman Makau	WW	Biomass Team Member	15-20 December 2014

Residents of villages located near the project boundary were also interviewed. Due to the fact that the audit team simultaneously performed verification assessments of both the Phase I and Phase II REDD+ projects the individuals and groups listed below included interviews from both projects. In many cases, for the sake of efficiency, stakeholder groups from both project were interviewed on the same day in a mutually acceptable location. Local residents of the following villages were interviewed during the dates listed.

- Dominy Lenjo – Secretary Taita and Director Amaka Ranch (19 December 2014)
- Pascal Kilou – Director Taita Ranch (19 December 2014)
- John Mwalui – Treasurer – Mwangu Ranch (10 December 2014)
- Charles M Mwaiseghe – Secretary Kambanga Ranch (19 December 2014)
- Newton Mkala – Director Mwangu Ranch (19 December 2014)
- Manuel Mwambacha – Secretary Muangu Ranch (19 December 2014)
- Gerald M Mbela – Vice Chairman Mwangu Ranch (19 December 2014)
- Rueben Mwaluma – Chairman Mwangu Ranch (19 December 2014)
- Francis Wambugu – Sagalla Ranch (19 December 2014)
- Marungu Hill Conservancy Association (MHCA) (15-20 December 2014)
- Kasigau Development Trust (KDT) (15-20 December 2014)
- Mwatate District Stakeholders Forum (MDSF) (15-20 December 2014)
- Mwachabo Development Forum (MDF) (15-20 December 2014)
- Sagalla Conservation and Development Forum (SCARDF) (15-20 December 2014)
- Rakata Group Ranch Managers (15-20 December 2014)
- Residents Kambanga and Maungu Ranches (15-20 December 2014)
- Employees of WW Factories (15-20 December 2014)
- Sagalla LLC (15-20 December 2014)
- Employees of WW Greenhouse (15-20 December 2014)
- Neema Womens Group (15-20 December 2014)

Site Inspections

The audit team performed an on-site inspection of the project area on the dates 15-20 December 2014. The main activities undertaken by the audit team were as follows:

- Interviews with project personnel to gather information regarding the project design;
- Interviews with members of the communities and other stakeholder groups to confirm
- the appropriate involvement of these groups;
- Interviews with government officials to confirm that the necessary approvals are in
- place;
- Review of records to ensure the appropriate design of the project; and
- Conduct of a visit to the project area to confirm the accuracy of the claims made in the
- PIR;
- Select samples of data from on-the-ground measurements for verification in order to meet a reasonable level of assurance.

Review of Stakeholder Comments

The PIR was posted on the CCBA website for the CCBA public comment period from 8 December 2014 – 7 January 2015. Comments received are discussed in Appendix A of this report.

Resolution of Discrepancies

Any potential or actual discrepancies identified with respect to the verification criteria were resolved through the issuance of findings. The types of findings issued by SCS 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 of evidence indicating that the identified discrepancy had been corrected. Resolution of all open NCRs was a prerequisite for issuance of a verification statement.

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 verification statement.

Opportunity for Improvement (OFI): An OFI indicated an area that should be monitored or ideally, improved upon. OFI's were considered to be an indication of something that could become a non-

conformity if not given proper attention, and were sometimes issued in the case that a non-material discrepancy was identified. OFIs were considered to be closed upon issuance.

All findings issued by the audit team during the verification process have been closed. All findings issued during the verification process, and the impetus for their closure, are described in Appendix B of this report. A total of 7 findings were issued.

Audit Team

The roles of the audit team members were as follows:

Lead auditor: Francis Eaton

Francis Eaton holds a Masters of Forest Science from the Yale School of Forestry and Environmental Studies and received his B.S. in Forestry from Northern Arizona University. The focus throughout his studies was forest management with emphases on sampling design and statistical analysis. His studies in the Southwest United States were concentrated in ecological restoration, conservation biology, and silviculture. He spent three years working collecting field data and completing data analysis on forest restoration projects utilizing thinning treatments and prescribed fire with the Ecological Restoration Institute. His work experience also includes complete biophysical inventories, estimation of timber volume, and wildfire risk assessments for two 3000 acre properties, as a forest consultant in northern New Mexico. Mr. Eaton has a long history of working with cattle and grazing lands and has spent over a decade working in the cattle production industry for the second largest cattle operation in the U.S. Mr. Eaton currently works as a verification forester for SCS and has a host of experience auditing AFOLU projects under the Verified Carbon Standard (VCS) and Climate, Community, and Biodiversity Alliance (CCBA) standards, as well as Improved Forest Management projects under the standards of the Climate Action Reserve (CAR), including projects in east Africa in Miombo, Mopane, Acacia, and Camiphora forest types. Finally, Mr. Eaton is an accredited as lead verifier under the State of California Air Resources Board (ARB) for U.S Forest Offset and Urban Forest project specialist.

Technical Reviewer: Dr. Letty B Brown

Dr. Brown holds a Ph.D. in Forest Science from the University of California, Berkeley, where she also completed her Master's in Range Ecology. Prior to joining SCS, Dr. Brown worked as a Forest Scientist at URS, where she led forest carbon offset project development and management of forest inventory for various clients. In this role she also worked on methodology development with the Verified Carbon Standard, developing methods for crediting wetland conservation projects in their Technical Working Group. Upon receiving her Ph.D. in 2007, Dr. Brown was a Fulbright Scholar and Postdoctoral Researcher in Brazil, designing and implementing remote-sensing and ground-based research to map and designate conservation targets for a portion of the Brazilian Atlantic Forest. Her background also includes forest restoration and ecological analysis, having created habitat conservation plans in California and managed

teams of field researchers throughout her career. She is trained as an Arborist, and has extensive experience using GIS software, database software, and statistical software. Dr. Brown is proficient in Portuguese, French, and Spanish, in addition to her English fluency.

Local Expert: Dr. Yvettes Kalema

Dr. Kalema is an ecologist, environmentalist and an educator with 10 years practical experience in botanical Inventories, Conservation, Ecosystems Management, and Environmental and Social-Ecological Assessments. Her research interests are in the fields of Ecology, Environmental issues, Climate change, Diversity, Conservation of drylands, Social Ecological assessments, Sustainability of woodlands and Rural Livelihoods issues. She has a PhD (Plant Ecology), Msc (Environmental Sciences), Bsc (Botany, Wildlife Management and Zoology), a Diploma (Range Management) and a certificate (Gene Bank Technology. During her PhD study, Dr. Kalema carried out a research in the woodland of Nakasongola with the aim of assessing the effects of land use (charcoal production, cultivation and grazing) on land cover and the implications on sustainability of woodland resources as well as the impacts on rural livelihood strategies. She has conducted various plant resources inventories and Environmental Impact Assessments in Tanzania. Ms. Kalema has attended a number of field Botanical training courses including one with Earth Watch in Taita Hills, Kenya, and carried out ecological studies on plants particularly the Acacias. Some of the results have been published in the book titled: Mkomazi: The Ecology, Biodiversity and Conservation of a Tanzanian Savanna, Coe, M, McWilliam N.; Stone, G. and Packer, M (Editors), The Royal Geographical Society, London, 1999. She worked as a Technical Advisor with Sustainable Land Management Programme in six cattle corridor districts Uganda (Consultancy) from July 2011 to 31st May 2012. Dr. Kalema has worked with SCS Global Services under Green House Gas Program as a Technical Expert in the project "Advancing REDD in the Kolo Hill Forests", Kondoa District, North-Central Tanzania. She is currently working with National Agricultural Advisory Services as Sustainable Land Management Specialist in the South- Western Highlands of Uganda. Ms. Kalema is fluent in English, and Swahili, and highly computer literate.

General Section

The General Section of the CCB Standards addresses original conditions in the project including baseline projections, project design and goals, management capacity and best practices, and legal status and property rights.

G1 – Original Conditions in the Project Area

The original conditions at the project area and the surrounding project zone before the project commences must be described. This description, along with baseline projections (see G2), will help to determine the likely impacts of the project

General Information

G1.1 - The location of the project and basic physical parameters (e.g., soil, geology, climate).	The audit team reviewed the PIR and confirmed that the PIR contains an exhaustive description of the project location and the basic physical parameters. In addition, the audit team reviewed a suite of topography, climate, and soil maps and confirmed that the maps were consistent with the observations of the audit team while on site
Conformance - Y	

G1.2 - The types and condition of vegetation within the project area.	While on site, the audit team visited each of the strata listed in the PIR and confirmed that the description provided is an accurate description of what exists on the ground
Conformance - Y	

G1.3 - The boundaries of the project area and the project zone.	Prior to the site visit, the audit team reviewed the PIR and confirmed that it contained a map of the project area boundaries and the boundaries of the project zone. While on site, the audit team confirmed these boundaries using GPS. In addition, through interviews with local residents the audit team confirmed that the project zone, as delineated in the PIR encompasses the project area in which project activities that directly affect land and associated resources, including activities such as those related to provision of alternate livelihoods and community development, are implemented
Conformance - Y	

Climate Information

G1. 4 - Current carbon stocks within the project area(s), using stratification by land-use or	The audit team reviewed the PIR and confirmed it contains a complete description of the current

vegetation type and methods of carbon calculation (such as biomass plots, formulae, default values) from the Intergovernmental Panel on Climate Change's 2006 Guidelines for National GHG Inventories for Agriculture, Forestry, and Other Land Use or a more robust and detailed methodology. Conformance - Y	carbon stocks using stratification and methods of carbon calculation. In addition, the audit team confirmed that the carbon was calculated in conformance with the VCS VM0009 v1.1 methodology, a more robust methodology than the IPCC 2006 Guidelines for National GHG Inventories. While on site, the audit team observed the project biomass team re-measure a number of plots in the two highest stocked strata and performed their own re-measurements. The resulting calculations confirmed that the carbon data were collected in a high-quality manner by highly skilled professionals and that the reported carbon values are accurate or otherwise conservative

Community Information

G1.5 - A description of communities located in the project zone, including basic socio-economic and cultural information that describes the social, economic and cultural diversity within communities (wealth, gender, ethnicity, etc.), identifies specific groups such as Indigenous Peoples and describes any community characteristics. Conformance - Y	The audit team reviewed the PIR and confirmed it contains an exhaustive description of communities located in the project zone. While on site, the audit team held interviews with community members across the project zone and confirmed that the community characteristics described in the PIR are consistent with feedback provided while on site. In addition, the audit team has performed many CCB audits in the past and are of the opinion that the community characteristics information in the PIR provides a sufficient description to that facilitates assessment by the public and the auditor

G1.6- A description of current land use and customary and legal property rights including community property in the project zone,	The audit team reviewed the PIR and confirmed that it contains a complete description of current land use and customary and legal property rights

identifying any ongoing or unresolved conflicts or disputes and identifying and describing any disputes over land tenure that were resolved during the last ten years (see also G5).	including community property in the project zone. In addition, the audit team confirmed that the PIR identifies ongoing or unresolved conflicts or disputes and disputes over land tenure that were resolved during the last ten years. While on site, the audit team met with community leaders and community based organizations (CBO) from the area participating in the project who confirmed that the PIR presents an honest description of current land use and customary and legal property rights including community property in the project zone
Conformance - Y	

Biodiversity Information

G1.7 - A description of current biodiversity within the project zone (diversity of species and ecosystems) and threats to that biodiversity, using appropriate methodologies, substantiated where possible with appropriate reference material.	The audit team reviewed the PIR and confirmed that it contains a description of current biodiversity within the project zone, including threats to that biodiversity, using appropriate methodologies and appropriate reference material. While on site, the audit team interviewed Dr. Mwangi Githiru who described the processes for monitoring biodiversity and confirmed the description in the PIR to be accurate. Finally, the audit team has extensive experience working in eastern Africa and agrees with the description of biodiversity in the project zone
Conformance - Y	

G1.8 - An evaluation of whether the project zone includes any of the following High Conservation Values (HCVs) and a description of the qualifying attributes:	The audit team reviewed the PIR and confirmed that it provides a description of the HCVs included in the project zone and a description of the qualifying attributes. As this indicator is set during

G1.8.1. Globally, regionally or nationally significant concentrations of biodiversity values; a. protected areas b. threatened species c. endemic species d. areas that support significant concentrations of a species during any time in their lifecycle (e.g. migrations, feeding grounds, breeding areas).	validation and is thus an ex-ante estimate, the audit team only assessed whether any changes had occurred since the previous verification. A more detailed description of HCV's is located in the monitoring sections of this report
Conformance - Y	

G1.8 - An evaluation of whether the project zone includes any of the following High Conservation Values (HCVs) and a description of the qualifying attributes: **G1.8.2** - Globally, regionally or nationally significant large landscape-level areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance;	As stated above, the audit team reviewed the PIR and confirmed that it provides a description of the HCVs included in the project zone and a description of the qualifying attributes. As this indicator is set during validation and is thus an ex-ante estimate, the audit team only assessed whether any changes had occurred since the previous verification. A more detailed description of HCV's is located in the monitoring sections of this report
Conformance - Y	

G1.8 - An evaluation of whether the project zone includes any of the following High Conservation Values (HCVs) and a description of the qualifying attributes: **G1.8.3** - Threatened or rare ecosystems;	The audit team reviewed the PIR and confirmed that it provides a description of the HCVs included in the project zone and a description of the qualifying attributes. As this indicator is set during validation and is thus an ex-ante estimate, the audit team only assessed whether any changes

Conformance - Y	had occurred since the previous verification. A more detailed description of HCV's is located in the monitoring sections of this report

G1.8 - An evaluation of whether the project zone includes any of the following High Conservation Values (HCVs) and a description of the qualifying attributes: **G1.8.4.** Areas that provide critical ecosystem services (e.g., hydrological services, erosion control, fire control);	The audit team reviewed the PIR and confirmed that it provides a description of the HCVs included in the project zone and a description of the qualifying attributes. As this indicator is set during validation and is thus an ex-ante estimate, the audit team only assessed whether any changes had occurred since the previous verification. A more detailed description of HCV's is located in the monitoring sections of this report
Conformance - Y	

G1.8 - An evaluation of whether the project zone includes any of the following High Conservation Values (HCVs) and a description of the qualifying attributes: **G1.8.5.** Areas that are fundamental for meeting the basic needs of local communities (e.g., for essential food, fuel, fodder, medicines or building materials without readily available alternatives); and	The audit team reviewed the PIR and confirmed that it provides a description of the HCVs included in the project zone and a description of the qualifying attributes. As this indicator is set during validation and is thus an ex-ante estimate, the audit team only assessed whether any changes had occurred since the previous verification. A more detailed description of HCV's is located in the monitoring sections of this report
Conformance - Y	

G1.8 - An evaluation of whether the project zone includes any of the following High Conservation Values (HCVs) and a description of the qualifying attributes:	The audit team reviewed the PIR and confirmed that it provides a description of the HCVs included in the project zone and a description of the qualifying attributes. As this indicator is set during

G1.8.6 -Areas that are critical for the traditional cultural identity of communities (e.g., areas of cultural, ecological, economic or religious significance identified in collaboration with the communities).	validation and is thus an ex-ante estimate, the audit team only assessed whether any changes had occurred since the previous verification. A more detailed description of HCV's is located in the monitoring sections of this report
Conformance - Y	

G2. Baseline Projections

A baseline projection is a description of expected conditions in the project zone in the absence of project activities. The project impacts will be measured against this 'without-project' reference scenario.

The project proponents must develop a defensible and well-documented 'without-project' reference scenario that must:

Baseline Projections

G2.1 - Describe the most likely land-use scenario in the absence of the project following IPCC 2006 GL for AFOLU or a more robust and detailed methodology, describing the range of potential landuse scenarios and the associated drivers of GHG emissions and justifying why the land-use scenario selected is most likely.	The audit team reviewed the PDD and confirmed that it contains an adequate description of the most likely land-use scenario within the Project Zone in the absence of the project, describing the range of potential land-use scenarios and the associated drivers of land use changes and justifying why the land-use scenario selected is most likely. In addition, while on site, the audit team interviewed project personnel and local community members who confirmed the rationale and alternatives provided in the VT0001 Additionality Tool. The audit team further observed these activities taking place in and around the project area while on site
Conformance - Y	

G2.2 - Document that project benefits would not have occurred in the absence of the project, explaining how existing laws or regulations would likely affect land use and justifying that the benefits being claimed by the project are truly 'additional' and would be unlikely to occur without the project.	As this indicator is set at validation and is thus an ex-ante estimate, the audit team only assessed whether any changes had occurred since the previous verification.
Conformance - Y	

G2.3 - Calculate the estimated carbon stock changes associated with the 'without project' reference scenario described above. This requires estimation of carbon stocks for each of the land-use classes of concern and a definition of the carbon pools included, among the classes defined in the IPCC 2006 GL for AFOLU. The timeframe for this analysis can be either the project lifetime (see G3) or the project GHG accounting period, whichever is more appropriate. Estimate the net change in the emissions of non-CO2 GHG emissions such as CH4 and N2O in the 'without project' scenario. Non-CO2 gases must be included if they are likely to account for more than 5% (in terms of CO2-equivalent) of the project's overall GHG impact over each monitoring period. Projects whose activities are designed to avoid GHG emissions (such as those reducing emissions from deforestation and forest degradation (REDD), avoiding conversion of non-forest land, or certain improved forest management projects) must include an analysis of the relevant drivers and rates of deforestation and/or degradation and a description and justification of the approaches, assumptions and data used to perform this analysis. Regional-level estimates can be used at	As this indicator is set at validation and is thus an ex-ante estimate, the audit team only assessed whether any changes had occurred since the previous verification. A more detailed description of carbon stocks is located in the monitoring section of this report

the project's planning stage as long as there is a commitment to evaluate locally-specific carbon stocks and to develop a project-specific spatial analysis of deforestation and/or degradation using an appropriately robust and detailed carbon accounting methodology before the start of the project.	
Conformance - Y	

G2.4 - Describe how the 'without project' reference scenario would affect communities in the project zone, including the impact of likely changes in water, soil and other locally important ecosystem services.	As this indicator is set at validation and is thus an ex-ante estimate, the audit team only assessed whether any changes had occurred since the previous verification. A more detailed description of community is located in the monitoring section of this report
Conformance - Y	

G2.5 - Describe how the 'without project' reference scenario would affect biodiversity in the project zone (e.g., habitat availability, landscape connectivity and threatened species).	As this indicator is set at validation and is thus an ex-ante estimate, the audit team only assessed whether any changes had occurred since the previous verification. A more detailed description of biodiversity is located in the monitoring section of this report
Conformance - Y	

G3. Project Design and Goals

The project must be described in sufficient detail so that a third-party can adequately evaluate it.

Projects must be designed to minimize risks to the expected climate, community and biodiversity benefits and to maintain those benefits beyond the life of the project. Effective local participation in project design and implementation is key to optimizing multiple benefits, equitably and sustainably. Projects that operate in a transparent manner build confidence with stakeholders and outside parties and enable them to contribute more effectively to the project.

The project proponents must:

Project Design and Goals

G3.1 - Provide a summary of the project's major climate, community and biodiversity objectives. Conformance - Y	As this indicator is set at validation is thus an ex-ante estimate, the audit team only assessed whether any changes had occurred since the previous verification. A more detailed description of the implementation of the project's major climate, community and biodiversity objectives is located in the monitoring section of this report

G3.2 - Describe each project activity with expected climate, community and biodiversity impacts and its relevance to achieving the project's objectives. Conformance - Y	As this indicator is set at validation is thus an ex-ante estimate, the audit team only assessed whether any changes had occurred since the previous verification. A more detailed description of the actual impacts is located in the monitoring section of this report

G3.3 - Provide a map identifying the project location and boundaries of the project area(s), where the project activities will occur, of the project zone and of additional surrounding locations that are predicted to be impacted by project activities (e.g. through leakage). Conformance - Y	The audit team reviewed the PIR and confirmed that the PIR contains a complete set of maps indicating the project location and boundaries of the project area(s), where the project activities will occur, of the project zone and of additional surrounding locations that are predicted to be impacted by project activities (e.g. through leakage)

G3.4 - Define the project lifetime and GHG accounting period and explain and justify any differences between them. Define an	The audit team reviewed the PIR and confirmed that it defines the project lifetime as the GHG accounting period. In addition, the audit team

implementation schedule, indicating key dates and milestones in the project's development.	confirmed that other than minor changes observed in the monitoring plan, that the project implementation schedule remains unchanged since validation
Conformance - Y	

G3.5 - Identify likely natural and human-induced risks to the expected climate, community and biodiversity benefits during the project lifetime and outline measures adopted to mitigate these risks.	As this indicator is set at validation is thus an ex-ante estimate, the audit team only assessed whether any changes had occurred since the previous verification. A more detailed description of the risks is located in the monitoring section of this report
Conformance - Y	

G3.6 - Demonstrate that the project design includes specific measures to ensure the maintenance or enhancement of the high conservation value attributes identified in G1 consistent with the precautionary principle.	As this indicator is set at validation is thus an ex-ante estimate, the audit team only assessed whether any changes had occurred since the previous verification. A more detailed description of the measures to ensure maintenance of HCV attributes is located in the monitoring section of this report
Conformance - Y	

G3.7 - Describe the measures that will be taken to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime.	As this indicator is set at validation is thus an ex-ante estimate, the audit team only assessed whether any changes had occurred since the previous verification. A more detailed description of the measures to ensure maintenance of the climate, community and biodiversity benefits beyond the project lifetime is located in the monitoring section of this report
Conformance - Y	

G3.8 - Document and defend how communities and other stakeholders potentially affected by the project activities have been identified and have been involved in project design through effective consultation, particularly with a view to optimizing community and stakeholder benefits, respecting local customs and values and maintaining high conservation values. Project developers must document stakeholder dialogues and indicate if and how the project proposal was revise based on such input. A plan must be developed to continue communication and consultation between project managers and all community groups about the project and its impacts to facilitate adaptive management throughout the life of the project. Conformance - Y	The audit team confirmed that the PIR includes a detailed description of the stakeholder consultation process. While onsite, the audit team interviewed project FPIC officers and community members who confirmed that the consultation process was implemented as described in the PIR. Moreover, the audit team reviewed meeting minutes, photographic evidence and sign in sheets confirming the level of outreach that was performed by the project personnel. Finally, interviews with village officials confirmed that the consultation process is ongoing with representatives from all participating communities being represented in order to learn from project successes and failures in order to ensure the project is being implemented using an adaptive management framework.

G3.9 - Describe what specific steps have been taken, and communications methods used, to publicize the CCBA public comment period to communities and other stakeholders and to facilitate their submission of comments to CCBA. Project proponents must play an active role in distributing key project documents to affected communities and stakeholders and hold widely publicized information meetings in relevant local or regional languages. Conformance - Y	As is the case in the community consultation section above, the audit team confirmed that the project design process has been implemented in a collaborative manner ensuring that all potentially affected stakeholders are included throughout the project design and implementation process. While onsite, the audit team interviewed community members across the project zone and confirmed that they were aware of the process for providing comments and were aware of the presence of the audit team during the site visit. It was apparent to the audit team that project information was provided in relevant languages and meetings were held in a culturally appropriate manner

G3.10 - Formalize a clear process for handling unresolved conflicts and grievances that arise during project planning and implementation. The project design must include a process for hearing, responding to and resolving community and other stakeholder grievances within a reasonable time period. This grievance process must be publicized to communities and other stakeholders and must be managed by a third party or mediator to prevent any conflict of interest. Project management must attempt to resolve all reasonable grievances raised, and provide a written response to grievances within 30 days. Grievances and project responses must be documented.	While on site, the audit team interviewed community members and project personnel and confirmed the process described in the validated PDD to be in place. The audit team agrees that the formalized process is consistent with the intent of the CCB Standards
Conformance - Y	

G3.11 - Demonstrate that financial mechanisms adopted, including projected revenues from emissions reductions and other sources, are likely to provide an adequate flow of funds for project implementation and to achieve the anticipated climate, community and biodiversity benefits.	The audit team reviewed the financial statements and budgets from each of the participating project partners and confirmed that the financial mechanisms adopted, including projected revenues from emissions reductions and other sources, are likely to provide an adequate flow of funds for project implementation and to achieve the anticipated climate, community and biodiversity benefits. The audit team confirmed that the project budgets were designed by individuals with a wealth of experience in designing avoided deforestation projects, including implementing activities designed to ensure success and confirmed that the budget carefully considers that cost of project implementation
Conformance - Y	

G4. Management Capacity and Best Practices

The success of a project depends upon the competence of the implementing management team. Projects that include a significant capacity-building (training, skill building, etc.) component are more likely to sustain the positive outcomes generated by the project and have them replicated elsewhere.

Best practices for project management include: local stakeholder employment, worker rights, worker safety and a clear process for handling grievances.

The project proponents must:

Management Practices and Best Practices

G4.1 -Identify a single project proponent which is responsible for the project's design and implementation. If multiple organizations or individuals are involved in the project's development and implementation the governance structure, roles and responsibilities of each of the organizations or individuals involved must also be described.	The audit team reviewed the PIR and confirmed that it identifies all of the project proponents involved in the project development and implementation including the roles and responsibilities of each. In addition the audit team held interviews with each of the implementing partners and confirmed that the project proponent is registered as Wildlife Works Carbon LLC
Conformance - Y	

G4.2 - Document key technical skills that will be required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills. Document the management team's expertise and prior experience implementing land management projects at the scale of this project. If relevant experience is lacking, the proponents must either demonstrate how other organizations will be partnered with to	The audit team reviewed the PIR 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 Wildlife Works carbon LLC. Have successfully designed and implemented such projects

support the project or have a recruitment strategy to fill the gaps.	
Conformance - Y	

G4.3 - Include a plan to provide orientation and training for the project's employees and relevant people from the communities with an objective of building locally useful skills and knowledge to increase local participation in project implementation. These capacity building efforts should target a wide range of people in the communities, including minority and underrepresented groups. Identify how training will be passed on to new workers when there is staff turnover, so that local capacity will not be lost.	The audit team confirmed that the PIR includes a plan to provide orientation and training for the project's employees and relevant people from the communities with an objective of building locally useful skills and knowledge to increase local participation in project implementation. While on site the audit team reviewed orientation and training plans and confirmed that they are designed to provide both orientation and training. In addition, the audit team interviewed community members currently employed by the implementing partners and confirmed that the training is designed to build capacity and target and wide range of community members including minorities and women. Furthermore, it was apparent to the audit team that training had already been passed down to new workers.
Conformance - Y	

G4.4 - Show that people from the communities will be given an equal opportunity to fill all employment positions (including management) if the job requirements are met. Project proponents must explain how employees will be selected for positions and where relevant, must indicate how local community members, including women and other potentially underrepresented groups, will be given a fair chance to fill positions for which they can be trained.	The audit team reviewed the PIR and confirmed that includes language to ensure equal opportunity employment. While onsite, the audit team interview local community members who confirmed that employment opportunities are posted on community bulletin boards and are available to all. Moreover, the audit team was provided with evidence that the biomass teams currently include females (a job normally provided

Conformance - Y	to males only) confirming the projects willingness to promote equal opportunity employment

G4.5 - Submit a list of all relevant laws and regulations covering worker's rights in the host country. Describe how the project will inform workers about their rights. Provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved	The audit team reviewed the PIR and confirmed it includes an exhaustive list of laws and regulations covering workers' rights. In addition, the audit team performed a web based review of employee rights in Kenya and confirmed that no laws or regulations have been omitted from the PIR. Finally, during the office portion of the site visit, the audit team reviewed the employee hiring process and confirmed that the process includes language informing employees of their rights
Conformance - Y	

G4.6 - Comprehensively assess situations and occupations that pose a substantial risk to worker safety. A plan must be in place to inform workers of risks and to explain how to minimize such risks. Where worker safety cannot be guaranteed, project proponents must show how the risks will be minimized using best work practices.	The audit team reviewed training and orientation documents while on site and confirmed that they included language showing risks had been assessed and language to minimize such risks. Finally, throughout the Wildlife Works offices and factories, the audit team observed a suite of safety postings
Conformance - Y	

G4.7 - Document the financial health of the implementing organization(s) to demonstrate that financial resources budgeted will be adequate to implement the project.	See G3.11 above
Conformance - Y	

G5. Legal Status

The project must be based on a solid legal framework (e.g., appropriate contracts are in place) and the project must satisfy applicable planning and regulatory requirements.

During the project design phase, the project proponents should communicate early on with relevant local, regional and national authorities in order to allow adequate time to earn necessary approvals. The project design should be sufficiently flexible to accommodate potential modifications that may arise as a result of this process.

In the event of unresolved disputes over tenure or use rights to land or resources in the project zone, the project should demonstrate how it will help to bring them to resolution so that there are no unresolved disputes by the start of the project.

Based on information about current property rights provided in **G1**, the project proponents must:

Legal Status and Property Rights

G5.1 - Submit a list of all relevant national and local laws and regulations in the host country and all applicable international treaties and agreements. Provide assurance that the project will comply with these and, where relevant, demonstrate how compliance is achieved.	The audit team reviewed the PIR and confirmed that it contains an exhaustive list of national laws and regulations regarding legal status and property rights. In addition, the audit team reviewed relevant land-use laws for Kenya and found no discrepancies with the PIR. Finally, while on site, the audit team interviewed landowners and employees throughout the project zone and found no instances of non-compliance to such laws
Conformance - Y	

G5.2 - Document that the project has approval from the appropriate authorities, including the established formal and/or traditional authorities customarily required by the communities.	The audit team reviewed the PIR and confirmed that it documents that it has approval from the local authorities. While on site, the audit team met with representatives of all the landowners and

Conformance - Y	communities in the project area, who further confirmed this approval

G5.3 - Demonstrate with documented consultations and agreements that the project will not encroach uninvited on private property, community property, or government property and has obtained the free, prior, and informed consent of those whose rights will be affected by the project.	While on site, the audit team reviewed the FPIC process implemented by the project personnel and confirmed through the review of meeting minutes and interviews with local communities that the project had obtained free, prior, and informed consent from all of the project participants. Furthermore, the majority of land in the project is owned by the project proponents making this an area of low risk in the opinion of the audit team
Conformance - Y	

G5.4 - Demonstrate that the project does not require the involuntary relocation of people or of the activities important for the livelihoods and culture of the communities. If any relocation of habitation or activities is undertaken within the terms of an agreement, the project proponents must demonstrate that the agreement was made with the free, prior, and informed consent of those concerned and includes provisions for just and fair compensation.	While onsite the audit team met with members from local communities, who confirmed that no individuals were relocated due to the project activities. In instances where activities important to the livelihoods of community were constrained, free, prior, and informed consent was granted during the stakeholder consultation process
Conformance - Y	

G5.5 - Identify any illegal activities that could affect the project's climate, community or biodiversity impacts (e.g., logging) taking place in the project zone and describe how the project will	The audit team reviewed the PIR and confirmed that it identifies a number of activities that could affect the project's climate, community or biodiversity impacts. The audit team was able to

help to reduce these activities so that project benefits are not derived from illegal activities.	confirm that this list was created through a collaborative effort by local officials and community members. The project has put mitigation measures in place to help reduce such activities as described in section G3
Conformance - Y	

G5.6 - Demonstrate that the project proponents have clear, uncontested title to the carbon rights, or provide legal documentation demonstrating that the project is undertaken on behalf of the carbon owners with their full consent. Where local or national conditions preclude clear title to the carbon rights at the time of verification against the Standards, the project proponents must provide evidence that their ownership of carbon rights is likely to be established before they enter into any transactions concerning the project's carbon assets.	As stated in G5.3 above, the majority of the land in the project is owned by the project proponents making this an area of low risk in the opinion of the audit team
Conformance - Y	

Climate Section

CL1. Net Positive Climate Impacts

The project must generate net positive impacts on atmospheric concentrations of greenhouse gases (GHGs) over the project lifetime from land use changes within the project boundaries.

The project proponents must:

Net Positive Climate Impacts

CL1.1 - Estimate the net change in carbon stocks due to the project activities using the methods of calculation, formulae and default values of the IPCC 2006 GL for AFOLU or using a more robust and detailed methodology. The net change is equal to carbon stock changes with the project minus carbon stock changes without the project (the latter having been estimated in G2). This estimate must be based on clearly defined and defendable assumptions about how project activities will alter GHG emissions or carbon stocks over the duration of the project or the project GHG accounting period.	As stated in G1.4 above the audit team confirmed that the project was in conformance to the VCS VM0009 v1.1 methodology with respect to calculating the current carbon stocking across the project zone and the expected baseline emissions. The audit team re-calculated the net change in emissions and confirmed that the estimated net change in GHG emission reductions was performed accurately and without material error for this monitoring period
Conformance - Y	

CL1.2 - Estimate the net change in the emissions of non-CO2 GHG emissions such as CH4 and N2O in the with and without project scenarios if those gases are likely to account for more than a 5% increase or de crease (in terms of CO2-equivalent) of the project's overall GHG emissions reductions or removals over each monitoring period.	The audit team confirmed that the exclusion of non-CO2 gases is in conformance with the methodology and is expected to result in conservative estimates of GHG emission reductions
Conformance - Y	

CL1.3 - Estimate any other GHG emissions resulting from project activities. Emissions sources include, but are not limited to, emissions from biomass burning during site preparation, emissions from fossil fuel combustion, direct emissions from the use of synthetic fertilizers, and	See CL1.2 above

emissions from the decomposition of N-fixing species.	
Conformance - Y	

CL1.4 - Demonstrate that the net climate impact of the project is positive. The net climate impact of the project is the net change in carbon stocks plus net change in non-CO2 GHGs where appropriate minus any other GHG emissions resulting from project activities minus any likely project-related unmitigated negative offsite climate impacts (see CL2.3).	As a result of the calculations described above in CL1.2 the audit team confirmed that the expected net climate impact of the project is positive
Conformance - Y	

CL1.5 - Specify how double counting of GHG emissions reductions or removals will be avoided, particularly for offsets sold on the voluntary market and generated in a country with an emissions cap.	The audit team reviewed the PIR and confirmed that it includes language attesting that the project has no intentions to register the project under any other GHG accounting program than the VCS. It is the understanding of the audit team that each VCU issued as a result of the project activities will be individually serialized to avoid double counting of emissions. This indicator should be re-assessed at each verification event
Conformance - Y	

CL2 – Offsite Climate Impacts ('Leakage')

The project proponents must quantify and mitigate increased GHG emissions that occur beyond the project area and are caused by project activities (commonly referred to as 'leakage').

The project proponents must:

Offsite Climate Impacts ('Leakage')

CL2.1 - Determine the types of leakage that are expected and estimate potential offsite increases in GHGs (increases in emissions or decreases in sequestration) due to project activities. Where relevant, define and justify where leakage is most likely to take place. Conformance - Y	The audit team reviewed the PIR and confirmed that it determines the types of leakage that are expected and estimates potential offsite increases in GHGs. The audit team confirmed that the project was in conformance with the requirements of the VCS VM0009 v1.1 methodology with respect to leakage. The audit team re-calculated the products from the leakage emissions model and confirmed that the original calculations were performed accurately and without material error. In addition, the audit team observed the re-measurement of two leakage plots and confirmed that the data was consistent with the project reported leakage values. Finally, while on site, the audit team held interviews with land owners and local community members who confirmed that illegal logging is not taking place within the project area and therefore an assessment of market leakage was not required

CL2.2 - Document how any leakage will be mitigated and estimate the extent to which such impacts will be reduced by these mitigation activities. Conformance - Y	The audit team reviewed the PIR and confirmed that it contains measures to mitigate leakage and the extent to which leakage will be avoided. In addition, the audit team interviewed local community members who were aware of the leakage mitigation activities and were involved in the development of such activities through the consultation process

CL2.3 - Subtract any likely project-related unmitigated negative offsite climate impacts from	The audit team reviewed the PIR and confirmed that it provides the net climate impacts, including

the climate benefits being claimed by the project and demonstrate that this has been included in the evaluation of net climate impact of the project (as calculated in CL1.4).	the subtraction of expected unmitigated leakage. The audit team re-calculated the net climate estimates and confirmed that the project calculations were in conformance with the VCS VM0009 v1.1 methodology, were performed accurately and were free from calculation error
Conformance - Y	

CL2.4 - Non-CO2 gases must be included if they are likely to account for more than a 5% increase or decrease (in terms of CO2-equivalent) of the net change calculations (above) of the project's overall off-site GHG emissions reductions or removals over each monitoring period.	As stated above in CL1.2 above, non-CO2 emissions have been conservatively excluded from the project calculations
Conformance - Y	

CL3 – Climate Impact Monitoring

Before a project begins, the project proponents must have an initial monitoring plan in place to quantify and document changes (within and outside the project boundaries) in project-related carbon pools, project emissions, and non-CO2 GHG emissions if appropriate. The monitoring plan must identify the types of measurements, the sampling method, and the frequency of measurement.

Since developing a full monitoring plan can be costly, it is accepted that some of the plan details may not be fully defined at the design stage, when projects are being validated against the Standards. This is acceptable as long as there is an explicit commitment to develop and implement a monitoring plan.

The project proponents must:

Climate Impact Monitoring

CL3.1 - Develop an initial plan for selecting carbon pools and non-CO2 GHGs to be monitored, and determine the frequency of monitoring. Potential	The audit team reviewed the PIR and confirmed that it includes a description of how carbon pools will be selected for monitoring. The audit team

pools include aboveground biomass, litter, dead wood, belowground biomass, wood products, soil carbon and peat. Pools to monitor must include any pools expected to decrease as a result of project activities, including those in the region outside the project boundaries resulting from all types of leakage identified in CL2. A plan must be in place to continue leakage monitoring for at least five years after all activity displacement or other leakage causing activity has taken place. Individual GHG sources may be considered 'insignificant' and do not have to be accounted for if together such omitted decreases in carbon pools and increases in GHG emissions amount to less than 5% of the total CO2-equivalent benefits generated by the project. Non-CO2 gases must be included if they are likely to account for more than 5% (in terms of CO2-equivalent) of the project's overall GHG impact over each monitoring period. Direct field measurements using scientifically robust sampling must be used to measure more significant elements of the project's carbon stocks. Other data must be suitable to the project site and specific forest type.	checked the monitoring plan against the requirements of the VCS Standard and the VM0009 v1.1 methodology and confirmed that all of the required carbon pools have been included in the plan. Furthermore, the audit team confirmed that the plan includes a process for determining the frequency and intensity of monitoring, include accounting for leakage. As stated previously, non-CO2 gases have been conservatively omitted, as is allowed by the methodology. While onsite, the audit team observed the project biomass team re-measure a series of plots in two of the forest strata and one grassland strata plot and confirmed that the monitoring plan is robust and is in line with best practices for monitoring carbon stocks on the ground. Moreover, the audit team re-measured one plot in the highest stocked strata and confirmed that the high quality field measurements were being collected and a data management and storage system was in place to ensure accurate reporting
Conformance - Y	

CL3.2 - Commit to developing a full monitoring plan within six months of the project start date or within twelve months of verification against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.	As described above, a full monitoring plan is currently in place. The audit team confirmed that the plan is of high quality, including requirements for frequency and intensity of monitoring and allows for replications, as was evidence by the audit teams ability to replicate the process
Conformance - Y	

Community Section

CM1. Net Positive Community Impacts

The project must generate net positive impacts on the social and economic well-being of communities and ensure that costs and benefits are equitably shared among community members and constituent groups during the project lifetime.

Projects must maintain or enhance the High Conservation Values (identified in **G1**) in the project zone that are of particular importance to the communities' well-being**.**

The project proponents must:

Net Positive Community Impacts

CM1.1 - Use appropriate methodologies to estimate the impacts on communities, including all constituent socio-economic or cultural groups such as indigenous peoples (defined in G1), resulting from planned project activities. A credible estimate of impacts must include changes in community well-being due to project activities and an evaluation of the impacts by the affected groups. This estimate must be based on clearly defined and defendable assumptions about how project activities will alter social and economic well-being, including potential impacts of changes in natural resources and ecosystem services identified as important by the communities (including water and soil resources), over the duration of the project. The 'with project' scenario must then be compared with the 'without project' scenario of social and economic well-being in the absence of the project (completed in G2). The difference (i.e., the community benefit) must be positive for all community groups.	The audit team reviewed the PIR and confirmed it includes an estimate of the impacts on communities, including all constituent socio-economic or cultural groups such as indigenous peoples. The audit team confirmed that the project uses a methodology that is consistent with the Theory of Change, as is suggested by the CCB Standards. While on site, the audit team interviewed local community members who confirmed that the claims in the PIR were are a result of the consultation process and are therefore clearly defendable. Furthermore, the focal issues used as indicators of change allowed the audit team to assess how these impacts over the current monitoring period. The PIR includes enough information to assess impacts and shows the result to be net positive for all communities, therefore meeting the requirements of this indicator
Conformance - Y	

CM1.2 - Demonstrate that no High Conservation Values identified in G1.8.4-6 will be negatively affected by the project.	Given that the community HCV's are inherently correlated with the climate benefits, the audit team agrees that avoided deforestation results in only positive impacts on the community HCV's described in G1.8.4-6
Conformance - Y	

Offsite Stakeholder Impacts

The project proponents must evaluate and mitigate any possible social and economic impacts that could result in the decreased social and economic well-being of the main stakeholders living outside the project zone resulting from project activities. Project activities should at least 'do no harm' to the well-being of offsite stakeholders.

The project proponents must:

Offsite Stakeholder Impacts

CM2.1 - Identify any potential negative offsite stakeholder impacts that the project activities are likely to cause.	The audit team reviewed the PIR and confirmed that it addresses the identification of offsite stakeholders. While on site, the audit team community leaders and landowners who confirmed that the offsite stakeholder impacts described in the PIR are accurate. Furthermore, the audit team held interviews with landowners who confirmed that the current system of land tenure and ownership result in low risk of negative risks to offsite stakeholders
Conformance - Y	

CM2.2 - Describe how the project plans to mitigate these negative offsite social and economic impacts.	The audit team agrees with the mitigation measures provided in the PIR that focusing on the

Conformance - Y	wildlife human conflict is an area to best achieve success in mitigating these negative impacts.

CM2.3 -Demonstrate that the project is not likely to result in net negative impacts on the well-being of other stakeholder groups.	Given that the project activities are designed to avoid deforestation, the audit team agrees that the result of the project is designed to provide a continued source of forest resources and grazing land. Whereas, wildlife human conflicts may affect other stakeholder groups, the audit team agrees that the mitigation measures in place are sufficient to ensure the project does not result in negative impacts on other stakeholders
Conformance - Y	

CM3. Community Impact Monitoring

The project proponents must have an initial monitoring plan to quantify and document changes in social and economic well-being resulting from the project activities (for communities and other stakeholders). The monitoring plan must indicate which communities and other stakeholders will be monitored, and identify the types of measurements, the sampling method, and the frequency of measurement.

Since developing a full community monitoring plan can be costly, it is accepted that some of the plan details may not be fully defined at the design stage, when projects are being validated against the Standards. This is acceptable as long as there is an explicit commitment to develop and implement a monitoring plan.

The project proponents must:

Community Impact Monitoring

CM3.1 - Develop an initial plan for selecting community variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the	The audit team reviewed the community monitoring planned described in the PIR and confirmed that the monitoring variables and the frequency of monitoring are directly linked to the

project's community development objectives and to anticipated impacts (positive and negative).	project's community development objectives and to anticipated impacts .While on site, the audit team interviewed local community members who confirmed that the community variables were produced as a result of the consultation process and are positive
Conformance - Y	

CM3.2 - Develop an initial plan for how they will assess the effectiveness of measures used to maintain or enhance High Conservation Values related to community well-being (G1.8.4-6) present in the project zone.	While on site the audit team met with project personnel and confirmed that the initial plan, as described in the initial Project Design Document (PDD) is in place and used to assess HCV's related to community well-being
Conformance- Y	

CM3.3 - Commit to developing a full monitoring plan within six months of the project start date or within twelve months of verification against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.	See CM3.1 above. The audit team was provided with a full monitoring plan at the time of verification. As the monitoring plan is included in the PIR the reader is directed to indicator G3.9 above
Conformance- Y	

Biodiversity Section

B1. Net Positive Biodiversity Impacts

The project must generate net positive impacts on biodiversity within the project zone and within the project lifetime, measured against the baseline conditions.

The project should maintain or enhance any High Conservation Values (identified in **G1**) present in the project zone that are of importance in conserving globally, regionally or nationally significant biodiversity**.**

Invasive species populations must not increase as a result of the project, either through direct use or indirectly as a result of project activities.

Projects may not use genetically modified organisms (GMOs) to generate GHG emissions reductions or removals. GMOs raise unresolved ethical, scientific and socio-economic issues. For example, some GMO attributes may result in invasive genes or species.

The project proponents must:

Net Positive Biodiversity Impacts

B1.1 -Use appropriate methodologies to estimate changes in biodiversity as a result of the project in the project zone and in the project lifetime. This estimate must be based on clearly defined and defendable assumptions. The 'with project' scenario should then be compared with the baseline 'without project' biodiversity scenario completed in G2. The difference (i.e., the net biodiversity benefit) must be positive.	The audit team worked with Dr. Mwangi Girithu and reviewed the data collected during the monitoring events. The audit team agrees with the project assessment that the positive and negative impacts on biodiversity are directly linked to the health and existence of the ecosystems that comprise habitat for wildlife. Moreover, the audit team is intimately familiar with the importance of wildlife to the biodiversity of the ecosystems themselves. The audit team was also able to confirm that the PIR provides a transparent description of the net impacts by comparing the 'with project' and 'without project scenarios that allows for assessment by the auditor and the public resulting in net positive impact estimates
Conformance- Y	

B1.2 Demonstrate that no High Conservation Values identified in G1.8.1-3 will be negatively affected by the project.	Given that the biodiversity HCV's are inherently correlated with the climate benefits, the audit team agrees that avoided deforestation is expected to have only positive impacts on the biodiversity HCV's described in G1.8.1.3
Conformance- Y	

B1.3 - Identify all species to be used by the project and show that no known invasive species will be introduced into any area affected by the project and that the population of any invasive species will not increase as a result of the project. Conformance- Y	The audit team reviewed the PIR and confirmed that it includes language addressing species used by the project. While on site, the audit team performed an assessment of the project greenhouses and observed no other species being used by the project. Finally, the audit team reviewed the online database http://www.issg.org/database/welcome/ confirming claims that none of the species used by the project are considered invasive

B1.4 - Describe possible adverse effects of non-native species used by the project on the region's environment, including impacts on native species and disease introduction or facilitation. Project proponents must justify any use of non-native species over native species. Conformance- Y	The audit team reviewed the information provided in the PIR and agree that the justification provided meets the requirements of this indicator. The audit included an individual educated invasive in species policy, management, and life history and agrees with the claims in the PIR

B1.5 - Guarantee that no GMOs will be used to generate GHG emissions reductions or removals. Conformance- Y	N/A – This indicator is not applicable as no GMO's will be used to generate emission reductions or removals

B2. Offsite Biodiversity Impacts

The project proponents must evaluate and mitigate likely negative impacts on biodiversity outside the project zone resulting from project activities.

The project proponents must:

Offsite Biodiversity Impacts

B2.1 - Identify potential negative offsite biodiversity impacts that the project is likely to cause.	While on site, the audit team held meetings interviews and landowners in the project zone, who corroborated the claims in the PIR that the project is unlikely to result in negative offsite biodiversity impacts. In addition, the audit team has experience in the region and agrees that keeping ecosystems intact provides corridors for wildlife that potentially cause problems with human settlements. Finally, the audit team was provided with literature showing the correlation between habitat and human wildlife conflicts, further confirming the claims in the PIR.
Conformance- Y	

B2.2 - Document how the project plans to mitigate these negative offsite biodiversity impacts	As previously stated the audit team confirmed that the PIR includes documented mitigation plans to address offsite negative biodiversity impacts. While on site the audit team interviewed local residents who confirmed that the project is implementing education on mitigating wildlife human conflicts
Conformance- Y	

B2.3 - Evaluate likely unmitigated negative offsite biodiversity impacts against the biodiversity benefits of the project within the project boundaries. Justify and demonstrate that the net effect of the project on biodiversity is positive.	N/A – See B2.2 above
Conformance- Y	

B3. Biodiversity Impact Monitoring

The project proponents must have an initial monitoring plan to quantify and document the changes in biodiversity resulting from the project activities (within and outside the project boundaries). The monitoring plan must identify the types of measurements, the sampling method, and the frequency of measurement.

Since developing a full biodiversity-monitoring plan can be costly, it is accepted that some of the plan details may not be fully defined at the design stage, when projects are being validated against the Standards. This is acceptable as long as there is an explicit commitment to develop and implement a monitoring plan.

The project proponents must:

Biodiversity Impact Monitoring

B3.1 - Develop an initial plan for selecting biodiversity variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project's biodiversity objectives and to anticipated impacts (positive and negative).	The audit team reviewed the PIR and confirmed that it contains a description of how the biodiversity variables were selected for monitoring. Also, see B1.1 above
Conformance- Y	

B3.2 - Develop an initial plan for assessing the effectiveness of measures used to maintain or enhance High Conservation Values related to globally, regionally or nationally significant biodiversity (G1.8.1-3) present in the project zone.	See CM1.2 above. In addition, the monitoring plan described above includes specific monitoring for the biodiversity HCV's listed in G1.8.1-3
Conformance- Y	

B3.3 - Commit to developing a full monitoring plan within six months of the project start date or within twelve months of verification against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.	The biodiversity monitoring plan is described in B3.1 above. The audit team was provided with a full monitoring plan at the time of verification. The audit team assessed the implementation of the monitoring plans while on site and confirmed that they have been implemented as described in the PIR
Conformance- Y	

Gold Level Section

GL1. Climate Change Adaptation Benefits

This Gold Level Climate Change Adaptation Benefits criterion identifies projects that will provide significant support to assist communities and/or biodiversity in adapting to the impacts of climate change. Anticipated local climate change and climate variability within the project zone could potentially affect communities and biodiversity during the life of the project and beyond. Communities and biodiversity in some areas of the world will be more vulnerable to the negative impacts of these changes due to: vulnerability of key crops or production systems to climatic changes; lack of diversity of livelihood resources and inadequate resources, institutions and capacity to develop new livelihood strategies; and high levels of threat to species survival from habitat fragmentation. Land-based carbon projects have the potential to help local communities and biodiversity adapt to climate change by: diversifying revenues and livelihood strategies; maintaining valuable ecosystem services such as hydrological regulation, pollination, pest control and soil fertility; and increasing habitat connectivity across a range of habitat and climate types.

The project proponents must:

Climate Change Adaptation Benefits

GL1.1 -Identify likely regional climate change and climate variability scenarios and impacts, using available studies, and identify potential changes in	The audit team reviewed the PIR and confirmed it includes regional climate change and climate variability scenarios and impacts, using available

the local land-use scenario due to these climate change scenarios in the absence of the project.	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 PIR and confirmed that the climate predictions of the literature are consistent with the claims in the PIR.
Conformance- Y	

GL1.2 - Identify any risks to the project's climate, community and biodiversity benefits resulting from likely climate change and climate variability impacts and explain how these risks will be mitigated.	Whereas, the impacts of climate change are difficult to predict, the audit team agrees with the assessment in the PIR regarding the anticipation of climate change risks and the mitigation measures needed to avoid the expected risks. Based on the current information available, the audit team confirmed with a reasonable level of assurance that the PIR provides adequate information for meeting the requirements of this indicator
Conformance- Y	

GL1.3 - Demonstrate that current or anticipated climate changes are having or are likely to have an impact on the well-being of communities and/or the conservation status of biodiversity in the project zone and surrounding regions.	The audit team reviewed the PIR and the referenced literature for this section and confirmed that PIR 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
Conformance- Y	

GL1.4 - Demonstrate that the project activities will assist communities and/or biodiversity to adapt to the probable impacts of climate change.	The audit team reviewed the PIR 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
Conformance- Y	

	agrees that the mitigation and adaptive strategies provided in the PIR are appropriate for the communities and biodiversity in the project zone

GL2. Exceptional Community Benefits

This Gold Level Exceptional Community Benefits criterion recognizes project approaches that are explicitly pro-poor in terms of targeting benefits to globally poorer communities **and** the poorer, more vulnerable households and individuals within them. In so doing, land-based carbon projects can make a significant contribution to reducing the poverty and enhancing the sustainable livelihoods of these groups. Given that poorer people typically have less access to land and other natural assets, this optional criterion requires innovative approaches that enable poorer households to participate effectively in land-based carbon activities. Furthermore, this criterion requires that the project will 'do no harm' to poorer and more vulnerable members of the communities, by establishing that no member of a poorer or more vulnerable social group will experience a net negative impact on their well-being or rights.

Project proponents must:

Exceptional Community Benefits

GL2.1 - Demonstrate that the project zone is in a low human development country OR in an administrative area of a medium or high human development country in which at least 50% of the population of that area is below the national poverty line.	N/A – The project is not claiming exceptional community benefits
Conformance Y	

GL2.2-Demonstrate that at least 50% of households within the lowest category of well-being (e.g., poorest quartile) of the community are likely to benefit substantially from the project.	N/A – The project is not claiming exceptional community benefits
Conformance Y	

GL2.3 -Demonstrate that any barriers or risks that might prevent benefits going to poorer households have been identified and addressed in order to increase the probable flow of benefits to poorer households.	N/A – The project is not claiming exceptional community benefits
Conformance Y	

GL2.4 - Demonstrate that measures have been taken to identify any poorer and more vulnerable households and individuals whose well-being or poverty may be negatively affected by the project, and that the project design includes measures to avoid any such impacts. Where negative impacts are unavoidable, demonstrate that they will be effectively mitigated.	N/A – The project is not claiming exceptional community benefits
Conformance Y	

GL2.5 - Demonstrate that community impact monitoring will be able to identify positive and negative impacts on poorer and more vulnerable groups. The social impact monitoring must take a differentiated approach that can identify positive and negative impacts on poorer households and individuals and other disadvantaged groups, including women.	N/A – The project is not claiming exceptional community benefits
Conformance Y	

GL3. Exceptional Biodiversity Benefits

All projects conforming to the Standards must demonstrate net positive impacts on biodiversity within their project zone. This Gold Level Exceptional Biodiversity Benefits criterion identifies projects that conserve biodiversity at sites of global significance for biodiversity conservation. Sites meeting this optional criterion must be based on the Key Biodiversity Area (KBA) framework of vulnerability and irreplaceability. These criteria are defined in terms of species and population threat levels, since these are the most clearly defined elements of biodiversity. These scientifically based criteria are drawn from existing best practices that have been used, to date, to identify important sites for biodiversity in over 173 countries.

Project proponents must demonstrate that the project zone includes a site of high biodiversity conservation priority by meeting either the vulnerability *or* irreplaceability criteria defined below:

Exceptional Biodiversity Benefits

<table>
<tr><td>GL3.1 - Vulnerability - Regular occurrence of a globally threatened species (according to the IUCN Red List) at the site:

GL3.1.1 - Critically Endangered (CR) and Endangered (EN) species - presence of at least a single individual.</td><td rowspan="2">The audit team reviewed the IUCN Red List and confirmed the claims in the PIR that the project zone is home to Diceros bicornis (black rhino), meeting the critically endangered criteria for this indicator (http://www.iucnredlist.org/details/6557/0).

Furthermore, while on site the audit team encountered 4 Equus grevyi (Grevy's zebra) within the project boundaries. The audit team collected photo evidence and compared them against the current information available and confirmed that the individuals were indeed the endangered species</td></tr>
<tr><td>Conformance Y</td></tr>
</table>

CCB Verification Conclusion

Following completion of SCS's duly-accredited verification process, it is our opinion the Kasigau Corridor Phase I REDD+ Project – Rukinga Sanctuary conforms to the CCBA Climate, Community and Biodiversity Project Design Standards (Second Edition) at the Gold Level.

Appendix A – Public Comments

Prior to conducting the verification site visit, the audit team was provided with a list of public comments received during the public comment period (8 December 2014 – 7 January 2015). Comments received during the public comment period are a verbatim replication of the comments as they were received. A complete list of comments and how the comments from the public comment period have been considered in the PIR (where applicable) or responded to by project personnel are as follows:

Comments Received During the Public Comment Period

Marungu` Community Comment

"The community members raised the issue of funds allocation from carbon sells. They said they are supposed to receive one third three times per year. They only received twice, when the inquired they were told that the market was not good, however, they are wondering the ranch owners receive their shares as agreed three times per year."

Wildlife Works Response

"There have been at least four community payments, and this is less frequent than the quarterly payments initially expected and communicated to the CBOs. However, communication on this to the CBOs changed early on in the Project as it became apparent that quarterly payments were unrealistic for two reasons:

a) community spending was occurring at different rates depending on the communities location, due to the resolution of remaining issues on lack of transparency and the selection of CBOs, and

b) fluctuations in the amount of carbon sales

The ranch owners have also not been receiving payments at the agreed upon quarterly rate for the same reasons as outlined above. Additionally, Wildlife Works has not yet paid the ranch owners their payments for 2014, but we anticipate that this will be rectified in the first half of 2015."

Marungu Community Comment

"One third given to the community come with directives e.g. if there an activity suggested by community and the cost is below 1 million KSH, WW implement that activity. The community feels that they should be the one implementing such activities to be able to generate some income."

Wildlife Works Response

"The funds that are allocated to the communities, 30% of the carbon credit revenue, are guided by Benefits Sharing Standard Operating Procedure (SOP), which was developed in a consultative process with the

community. The SOP requires the proposals to WWC for projects to come from the community through the CBO, and then they forward proposals to LCCs for prioritization. Once the LCC approves the project they request funds from Wildlife Works Carbon Trust. The implementation of the projects is done by the CBO and not WWCT. The role of WWCT is to monitor the project and to ensure adherence to the SOP."

Marungu Community Comment

"The community feels that their share should go direct to their CBO account and not in WW account, they want to have total control of their share because the current procedure of requesting only the amount needed for certain activity, the community said they never get to know what the remaining money go."

Marungu Community Comment

"Community members said that they need to sign agreement with WW so that they are able to take control of their share"

Wildlife Works Response

"We can work with a number of CBOs in any given location, as long as they meet the requirements stipulated in the SOP. Therefore, funds cannot be directed to only one CBO or directly to the bank account of a CBO. Although the Marungu CBO would like the community revenue to go directly to their bank account, the greater community has been very clear that they would not want this to happen. The community has stated that they wish for the money to pass through the system that is in place, a system that was created with participation from the community.

The communities' share of the Carbon revenue additionally has to go to a Trust because Wildlife Works Carbon Trust (WWCT) is a tax-free organization under Kenyan tax laws, since this money is meant for the community. The SOP that guides the benefit sharing of the carbon revenue clearly states the roles of the CBOs, LCCs and WWCT, and states the flow of funds from WWC to the communities. After going through the process as described in the SOP the money is released to the CBOs bank accounts.

We are currently building the capacities of the CBOs so that they are able to control their share of funds. All Project costs are published on the notice boards at the Chiefs offices so at any time the community members can see what the money allocated to them has been spent on."

Marungu Community Comment

"The community also said that the amount they spend does not match with the amount they are supposed to receive per quarter"

Wildlife Works Response:

"The individual CBOs do not have an allocated amount of funding, instead the CBOs receive money based on the sales and allocations by the LCC's and not on a set quarterly allocation. The CBOs can only spend what they have received from the WWCT for LCC approved projects."

Marungu Community Comment

"*The community want direct representation in the board of Trustee."*

Wildlife Works Response:

"The role of the Wildlife Works Carbon Trust (WWCT) is to physically receive the community revenue into the country in a way that avoids paying taxes to the local and national Government. All of the community projects are assisting the country with infrastructural development and capacity building and are therefore of huge financial benefit not only to the communities, but also to the Government.

The second role of the WWCT is to ensure that the Community Benefits - Standard Operating Procedure (SOP) is followed correctly and that the money is being disbursed in a transparent, fair and equitable way. To do this, the Trust has a Disbursement Committee that sits every month, or whenever necessary and is made up of Wildlife Works employees, technical experts and members of the community that are working on the projects that are happening at that time.

The WWCT has no say whatsoever in what projects the community money is spent on, that is the job of the Locational Carbon Committees (LCC's) and the WWCT has no say in how the CBO's physically spend the money, other than ensuring that the SOP is followed correctly.

It might be that there is confusion in some community members as to what the roles and responsibilities of the Trust are and that they feel that by being members of the Board of Trustees would enable them to influence where and how the money is spent by the LCC's and the CBO's. It is important to the project that these important decisions are allowed to remain with the LCC's who are democratically elected by the communities themselves and not governed over by a nominated Board of Trustees."

Marungu Community Comment

"The employment issue, they said 70% should be from the local communities, however, they said big percentage of rangers are from outside the project area."

Wildlife Works Response:

"Wildlife Works has held several open Ranger recruitment events and these have all been announced to the community through the Chiefs office. These recruitments have been held in all the locations in the project area. In actuality more than 70% of Project employment is from the Project Area and we have statistics to prove this. The Monitoring Report for the Project contains this employment data, which

demonstrates that the amount of local employment is over 70% and has been for much of the Projects life to date."

Marungu Community Comment

"*The community also said in case of any advertisement should be put close to the communities and the suggested a second notice board at the village office."*

Wildlife Works Response

"All the advertisements go to the community notice boards at the Chiefs' offices. In the Chiefs' offices there are notice boards on the wall where we put all the advertisements. We do have plans to put up big notice boards for the REDD+ project in the highly populated villages rather than solely in the Chiefs offices so that more people will be able to easily see advertisements and notices."

Marungu Community Comment

"The community raised an issue regarding the community forest rangers, that they are paid less compared to the WW rangers, that they are both doing the same work."

Wildlife Works Response:

"The money for paying community Rangers is a donation from Wildlife Works Sanctuaries Limited; this is not funded through the community allocation of the carbon revenue. The CBOs have the right to write proposals to other funding bodies to be able to increase Community Forest Rangers salaries. However, this is not something that Wildlife Works controls nor can provide."

Marungu Community Comment

"*They raised an issue of misunderstanding between LCC and CBOs that the LCC are overstepping their boundaries and that WW is listening to LCC and not CBOs. They said sometimes WW is influencing the decision made by LCC."*

Wildlife Works Response:

"The standard operating procedure for the distribution of the community benefits outlines the roles and responsibilities of the CBOs and the LCCs. The LCCs are decision makers and while the CBOs are implementers of various projects. WWCT accepts the decisions made by the LCCs and works to fund the CBOs to implement the projects.

WWCT are not members of the LCCs and they don't have right to vote for any project or influence any decisions made by the LCCs, and this is clearly stipulated in the SOP. WWCT can only question a decision

made by the LCC if it contravenes the SOP and/or might adversely affect the carbon stocks in the project area. WWCT has never taken this step and the LCCs are free to spend the revenue as they see fit. "

Marungu Community Comment

"*They also talked of monitoring ongoing activities, that the CBOs have no money to carry out monitoring that instead it the LCC doing the monitoring. They said that CBOs should have money they are implementers, they need to have allowances, vehicle to be able to reach out and carry out monitoring and evaluation."*

Wildlife Works Response

"Under the SOP for the distribution of community benefits the LCCs are not project monitors, and therefore they have never been given money to monitor projects. It is the CBOs role to monitor the project implementation, and the funding for this is indeed provided. WWCT monitors the overall project, including the funding disbursements and ensuring that the SOP is fully followed.

The Project has worked to increase the capacity of the CBOs so that they can physically and financially manage the projects that have been allocated funding by the LCC. At the present time, however, funds have not allowed such large purchases such as vehicles and the LCCs have not felt this was a suitable allocation of the revenue."

Marungu Community Comment

"*They also said during amendment of the 3rd and 4th SOPs communities were not involved. They said the 1st and 2nd were consultative and it worked well but the third and forth is not favoring the community. They also said the time given to community to go through is short. They said the need more time to go through and involve the community so that they give their opinions"*

Wildlife Works Response

"For the development of the 3rd and 4th Version of the benefits distribution SOP the same consultative process was utilized as for the earlier versions. For example, a clause was added that would have given additional powers of decision making to the CBO's, however it was changed after we consulted with the community. This is seen in article (2.2 e) of the SOP that was revised after receiving input from community members to read "LCC members should not be sitting members of the Executive Board of any CBO." Whereas in version 1 and 2 of the SOP the clause had stated that not more than 3 members of any CBO could be elected to be a member of a LCC. Marungu Hill Conservancy had 3 members who were also members of the LCC committee, and this was not working well for the communities because they felt that there could be conflict of interest, which we agreed with. When the next election for member of the LCC was held, under the rules of the new version 3 of the SOP, no members of the Marungu hill Conservancy

were elected by the community to the LCC. Version 3 of the SOP has been working very well with the other CBOs, who have all agreed with the revisions that were made in that version.

For the SOP revision process we involve all of the elected committees and administration. The committees are elected by the community, which therefore provides a good representation to the community. Additionally, we hold trainings about the SOP, and any revisions made to different groups so that they learn procedures that are to be followed."

Marungu Community Comment

"*Invitation for representation in the meeting should not come with names, because sometimes people who are invited do not present their interests."*

Wildlife Works Response

"*The invitations for the meetings are handled through the Chiefs' offices. The committee Chairpersons will invite individuals to other committee meetings.*

The community meetings are done in community barazas whereby all people have the right to attend. Special meetings are coordinated through village Chiefs, letters invitation, telephone calls and emails. If there are any individuals that you feel are being specifically excluded from meetings please contact Lenjo directly to report this issue."

Marungu Community Comment

"*The CBO said they had never received any training, only the LCC are trained, therefore, CBO also need to have some trainings."*

Wildlife Works Response

"Trainings are held annually for the CBO board members about the SOP and the projects management. Wildlife Works has the minutes from these trainings archived at our office to document the frequency, subject and attendance at these trainings. Wildlife Works supports the CBOs and view them as essential partners in the Kasigau Corridor REDD+ Project. We have a strong desire to increase their expertise, and ensure their success in the implementation and management of community projects."

As a result of these comments the audit team held meetings with all of the individuals, communities, and groups listed in the Interviews Section of this report. The resulting understanding of the audit team is that these comments are outside of what is included in the project design and monitoring plan and are therefore outside of the scope of the verification assessment. As of the time of this verification the audit team was able to reach a reasonable level of assurance that the net community benefits remain positive. Future verifiers should follow up on these issues as far as they are included in the determination of community benefits.

Appendix B – Verification Findings

The following tables include all issues raised during the verification audit of the Kasigau Corridor Phase I REDD+ Project. It should be noted that all language under "Client Response" is a verbatim transcription of responses to findings as provided by project personnel. It should be noted that as both the Kasigau Corridor Phase I & II verification assessments were performed simultaneously, the below findings include findings from both projects.

NCR 2014.1 dated 01/11/2015

Standard Reference: VM0009 v1.1 Section 13.11

Document Reference: Standard Operating Procedures (SOP) for Biomass Plot Sampling: Kasigau I & II

Finding: The VM009 v1.1 Methodology states that "To ensure that carbon stocks are estimated in a way that is accurate, verifiable, transparent, and consistent across measurement periods, the project proponent must establish and document clear standard operating procedures and procedures for ensuring data quality. At a minimum, these procedures must include:

-Comprehensive documentation of all field measurements carried out in the project area.

This document must be detailed enough to allow replication of sampling in the event of

staff turnover between monitoring periods.

- Training procedures for all persons involved in field measurement or data analysis. The

scope and date of all training must be documented.

-A protocol for assessing the accuracy of plot measurements using a check cruise and a

plan for correcting the inventory if errors are discovered.

-Protocols for assessing data for outliers, transcription errors, and consistency across

measurement periods.

-Data sheets must be safely archived for the life of the project. Data stored in electronic

formats must be backed up"

During the field portion of the site visit the audit team was made aware of field SOP's that are not included in the project documentation and therefore is not in conformance with the methodology. Specifically, in a few instances the audit team encountered tree stems that included a third fork, in which case a specific

protocol was applied. Whereas, the audit team agrees that the protocol results in conservative estimates of GHG reductions and removals, the documentation does not allow for "Comprehensive documentation of all field measurements carried out in the project area. This document must be detailed enough to allow replication of sampling in the event of staff turnover between monitoring periods." Please amend the project documentation to include such information.

Client Response: Wildlife Works accepts this finding. The Standard Operating Procedure (SOP) for biomass plot sampling is a robust document that provides the plot teams with a full suite of procedures and comprehensive guidance for the measurement of trees and shrubs in the Kasigau Corridor REDD+ Project Phase I and Phase II. This document was written initially at the onset of the Project, and has been amended over the Projects crediting period to reflect any gaps in the included procedures and as the methods have been refined. The SOP did not include specific guidance on how to determine the location for diameter measurement on trees that have a third fork in a stem. Though this was not included in the written SOP, the Biomass Plot Sampling team had developed a uniform procedure that has been used consistently throughout the Project to date, and which provides a conservative measurement of carbon in the Project Area. The Biomass SOP has been updated to incorporate the methods that were used by the biomass sampling team. The following text was added to section 7.2.6.9. of the Biomass SOP for the Kasigau Corridor REDD+ Project Phase I and Phase II concerning trees with the first fork occurring less than 40 cm above the ground: “If there is a third split in the stem less then 1 m above the second fork, then the diameter of the stem should be measured immediately below the third split at a location below any swelling occurring from the stem split (Figure A9).” Additionally, the following text has been added to section 7.2.6.10. for trees with the first fork occurring greater than 40 cm but less than 1.4 m above the ground: “If there is a third split in the stem less then 1 m above the second fork, then the diameter of the stem should be measured immediately below the second split and below any swelling associated with the second fork (Figure A12).”

Auditor Response: The audit team was provided with amended field SOP's and was able to confirm the language added to Sections7.2.6.9 and 7.2.6.10 and additional figures, A9 and A12 were added and therefore now allow for repeatability in the case of staff turnover. The information provided is sufficient for closing this finding.

Closing Remarks: The Client’s response adequately addresses the finding.

NCR 2014.2 dated 01/11/2015

Standard Reference: VM0009 v1.1 Section 13.11

Document Reference: Standard Operating Procedures (SOP) for Biomass Plot Sampling: Kasigau I & II

Finding: The VM009 v1.1 Methodology states that "To ensure that carbon stocks are estimated in a way that is accurate, verifiable, transparent, and consistent across measurement periods, the project proponent must establish and document clear standard operating procedures and procedures for ensuring data quality. At a minimum, these procedures must include:

-Comprehensive documentation of all field measurements carried out in the project area.

This document must be detailed enough to allow replication of sampling in the event of staff turnover between monitoring periods.

- Training procedures for all persons involved in field measurement or data analysis. The scope and date of all training must be documented.

-A protocol for assessing the accuracy of plot measurements using a check cruise and a plan for correcting the inventory if errors are discovered.

-Protocols for assessing data for outliers, transcription errors, and consistency across measurement periods.

-Data sheets must be safely archived for the life of the project. Data stored in electronic formats must be backed up"

During the field portion of the site visit the audit team was made aware of field SOP's that are not included in the project documentation and therefore is not in conformance with the methodology. Specifically, in a few instances the audit team encountered tree stems that were considered "branches" and not stems, in which case a specific protocol was applied. Whereas, the audit team agrees that the protocol results in conservative estimates of GHG reductions and removals, the documentation does not allow for "Comprehensive documentation of all field measurements carried out in the project area. This document must be detailed enough to allow replication of sampling in the event of staff turnover between monitoring periods." Please amend the project documentation to include such information.

Client Response: Wildlife Works accepts this finding. The Standard Operating Procedure (SOP) for biomass plot sampling is a robust document that provides the plot teams with a full suite of procedures and comprehensive guidance for the measurement of trees and shrubs in the Kasigau Corridor REDD+ Project Phase I and Phase II. This document was written initially at the onset of the Project, and has been amended over the Projects crediting period to reflect any gaps in the included procedures and as methods have been refined. The SOP did not include specific guidance on how to determine whether something should be considered a tree stem or as a branch. Though this was not included in the written SOP, the Biomass Plot Sampling team had developed a uniform procedure that has been used consistently throughout the Project to date, and which provides a conservative measurement of carbon in the Project Area. The Biomass SOP has been updated to incorporate the methods that were used by the biomass sampling team. The following text was added to section 7.2.6.7 of the Biomass SOP for the Kasigau Corridor REDD+ Project Phase I and Phase II: “A tree stem is defined as having a diameter of at least 1/3 or greater of the diameter of the main stem, anything with a diameter of less than 1/3 of the diameter of the main stem is classified as a branch. The diameter should be measured just above the fork for determination of stem or branch.”

Auditor Response: The audit team was provided with amended field SOP's and was able to confirm the language added to Sections7.6.2.7 and therefore now allow for repeatability in the case of staff turnover. The information provided is sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NCR 2014.3 dated 01/11/2015

Standard Reference: VM0009 v1.1 Section 13.11

Document Reference: Standard Operating Procedures (SOP) for Biomass Plot Sampling: Kasigau I & II

Finding: The VM009 v1.1 Methodology states that "To ensure that carbon stocks are estimated in a way that is accurate, verifiable, transparent, and consistent across measurement periods, the project proponent must establish and document clear standard operating procedures and procedures for ensuring data quality. At a minimum, these procedures must include:

- Comprehensive documentation of all field measurements carried out in the project area.

This document must be detailed enough to allow replication of sampling in the event of

staff turnover between monitoring periods.

- Training procedures for all persons involved in field measurement or data analysis. The

scope and date of all training must be documented.

-A protocol for assessing the accuracy of plot measurements using a check cruise and a

plan for correcting the inventory if errors are discovered.

-Protocols for assessing data for outliers, transcription errors, and consistency across

measurement periods.

-Data sheets must be safely archived for the life of the project. Data stored in electronic

formats must be backed up"

During the field portion of the site visit the audit team was made aware of field SOP's that are not included in the project documentation and therefore is not in conformance with the methodology. Specifically, in a few instances the audit team encountered trees under three meters had tree specific measurement protocols. Whereas, the audit team agrees that the protocol results in conservative estimates of GHG reductions and removals, the documentation does not allow for "Comprehensive documentation of all field measurements carried out in the project area. This document must be detailed enough to allow

replication of sampling in the event of staff turnover between monitoring periods." Please amend the project documentation to include such information.

Client Response: Wildlife Works accepts this finding. The Standard Operating Procedure (SOP) for the biomass plot sampling is a robust document that provides a plot teams with a full suite of procedures and comprehensive guidance for the measurement of trees and shrubs in the Kasigau Corridor REDD+ Project Phase I and Phase II. This document was written initially at the onset of the Project, and has been amended over the Projects crediting period to reflect any gaps in the included procedures and as methods have been refined. The SOP did not include specific guidance on how to determine the location for the measurement of the stem diameter on trees that have at least one stem that is greater than 5 cm in diameter but where the tree is under 3 m in total height. Though this was not included in the written SOP, the Biomass Plot Sampling team had developed a uniform procedure that has been used consistently throughout the Project to date, and which provides a conservative measurement of carbon in the Project Area. For trees under 3 m in total height, but with a DBH of 5cm or greater the diameter is measured at 1.4 m regardless of the presence of any forks in the stem. The SOP has been amended to include this guidance in section 7.2.6.11. of the Biomass SOP for the Kasigau Corridor REDD+ Project Phase I and Phase II.

Auditor Response: The audit team was provided with amended field SOP's and was able to confirm the language added to Sections7.6.2.11 and therefore now allow for repeatability in the case of staff turnover. The information provided is sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2014.4 dated 01/11/2015

Standard Reference: VCS Standard v3.4 Section 3.11.1

Document Reference: NA

Finding: The VCS Standard states that "The project description shall be accompanied by documentary evidence establishing conclusively one or more of the following rights of use (see VCS document Program Definitions for definition of right of use) accorded to the project proponent(s):

1) A right of use arising or granted under statute, regulation or decree by a competent authority.

2) A right of use arising under law.

3) A right of use arising by virtue of a statutory, property or contractual right in the plant,

equipment or process that generates GHG emission reductions and/or removals (where such

right includes the right of use of such reductions or removals and the project proponent has

not been divested of such right of use).

4) A right of use arising by virtue of a statutory, property or contractual right in the land,

vegetation or conservational or management process that generates GHG emission

reductions and/or removals (where such right includes the right of use of such reductions or removals and the project proponent has not been divested of such right of use).

5) An enforceable and irrevocable agreement with the holder of the statutory, property or

contractual right in the plant, equipment or process that generates GHG emission reductions

and/or removals which vests the right of use in the project proponent.

6) An enforceable and irrevocable agreement with the holder of the statutory, property or

contractual right in the land, vegetation or conservational or management process that

generates GHG emission reductions or removals which vests the right of use in the project

proponent.

7) A right of use arising from the implementation or enforcement of laws, statutes or regulatory

frameworks that require activities be undertaken or incentivize activities that generate GHG

emission reductions or removals."

During the site visit the audit team was made aware that a portion of the Project area had changed ownership. In addition, the new land owner expressed that the former land parcel would now be represented as three separate land parcels with three separate conservation easements. Please provide evidence that the portion of the Project Area now owned by Francis Wambugu and subsequently, the remaining two portions of the parcel are still covered by the rights of use agreements previously in place or by new rights of use agreements as defined in the VCS Standard.

Client Response: During this monitoring period the sale of portions of Sagalla Ranch was completed. This sale resulted in a sub-division of the Group Ranch from one parcel with a singular ownership group into 3 individual parcels each under different ownership. Wildlife Works was aware of this process throughout the sale, and has worked closely with all of the parties to ensure that there is no interruption of Project Activities or adverse impacts on the forest or biodiversity as a result of the subdivision. All of the landowners are aware of the Kasigau Corridor REDD+ Project, and are fully supportive of it and its goals. We have verified the sale, and established the authenticity of the land Title Deeds. The Conservation Easement (CE) that was signed by the Landowners of Sagalla Ranch specifically states that the terms of the CE must be included in the deed or other instrument used to sell or sub-divide the ranch, and the presence of the CE will be disclosed to any purchaser. However, to ensure the validity of the CE and full understanding of its terms two new Conservation Easements have been signed with the Landowners of the new sub-divided land parcels. This includes Mr. Izera Wambugu and Kale Holdings, the owners of the two sub-divided parcels. This will ensure that these two new land parcels will remain fully engaged in the

REDD+ Project and continuing adhering fully to the terms of Project. We have provided the 2 new CEs to the auditor as evidence that the rights of use are in place for these land parcels.

Auditor Response: As stated in the client response, the audit team was provided with copies of the new conservation easements which clearly state " In consideration for the payment under clause 6, the Grantors transfer all carbon units and any rights, titles and interests arising from Carbon Sequestration, Carbon Rights, any other Carbon related benefits arising under REDD or other internationally accepted Carbon Offset project on the Land that exists or may come to exist at law ("Conservation Rights") to Grantee for the period up to and including the Expiry Date of this deed." In which Carbon Rights are defined as "any right, entitlement or claim to the legal, commercial or other benefit, whether present or future, to Carbon Sequestered in the trees or any other vegetation on the Land."

The audit team considers these documents to be confirmation that the requirement of the original easement that the terms of the easement must be included in the deed or other instrument used to sell or subdivide the ranch. The information provided is sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2014.5 dated 01/11/2015

Standard Reference: The VCS AFOLU Non-Permanence Risk Tool v3.2 Section 2.3.1 (a)

Document Reference: Non-Permanence Risk Report - The kasigua Corridor REDD Project - Phase I Rukinga Sanctuary 4th Monitoring Period Section 2 (a)

Finding: The VCS AFOLU Non-Permanence Risk Tool requires that a risk score of 2 be applied if "Ownership and resource access/use rights are held by different entity(s) (e.g., land is government owned and the project proponent holds a lease or concession)."

Given that the Carbon Rights have been given to wildlife Works LLC and the land from which they are generated is owned by the local communities, it appears that a score of 0 is not appropriate for this risk indicator. Please provide evidence that the Resources Access/Use Rights are held by the same entity or otherwise adjust the Risk score accordingly.

Client Response: Phase I:

In the Wildlife Works Project Kasigau Corridor REDD+ Project Phase I, The Rukinga Sanctuary the land ownership and the rights of use are held by the same entity. This Ranch is majority owned by Wildlife Works Inc., and the same company also wholly owns the resource rights. Wildlife Works Inc. is also the Project Proponent for the Phase I project. This Project administered on the ground by Wildlife Works Carbon under an agreement between both companies.

Phase II:

Wildlife Works accepts this finding for the Wildlife Works Project Kasigau Corridor REDD+ Project Phase II, The Community Ranches. In this Project the land ownership and the rights to all resources for the 13 Group Ranches are granted to the ranch owners under leasehold from the Government of Kenya. The ranch owners have then transferred the rights to the resources to Wildlife Works through Conservation Easements. Therefore, as the Auditor notes, the land ownership and the rights to the resources are held by different entities, the ranch owners and Wildlife Works. Therefore, the Non-Permanence tool for the Phase II Project has been revised to reflect a "2" value for this factor. However, the "Land Tenure and Resource Access/Impacts" section of the Non-Permanence tool had previously had a "-2" value as a result of the Project being eligible for a mitigation due to the use of the Conservation Easements. This negative value could not be carried forward, therefore the where the previous rating of this section was "0 (-2)", it is now "0 (0)" and the overall Risk Rating of the Project does not change.

Auditor Response: The audit team was provided with the updated risk report for phase II and confirmed that the appropriate risk score for this item has been applied by the project and is now in conformance with the requirements of the tool.

Additionally, the response provided by project personnel is consistent with the outcome of interviews with landowners while onsite and therefore does not require a change to this risk score.

Closing Remarks: The Client's response adequately addresses the finding.

NIR 2014.6 dated 01/11/2015

Standard Reference: The VCS AFOLU Non-Permanence Risk Tool v3.2 Section 2.4.1

Document Reference: Non-Permanence Risk Report - The kasigua Corridor REDD Project - Phase I Rukinga Sanctuary 4th Monitoring Period Section 3

Finding: The VCS AFOLU Non-Permanence Risk Tool states that "Natural risk is based on likelihood (i.e., the historical average number of times the event has occurred in the project area over the last 100 years) and significance (i.e., the average significance of each event). Any significant natural risk (i.e., a risk affecting more than 5% of the project area) that has occurred over the past 100 years in the project area shall be considered applicable to the project. The frequency and significance of events shall be estimated based on historical records, probabilities, remote sensing data, peer-reviewed scientific literature, and/or documented local knowledge, such as survey data in project areas, and may include projected climate change impacts. Where data are available for at least 20 years, but less than 100 years, projects shall conservatively extrapolate using available data. Where such data are not available for the project area,

likelihood and significance shall be determined based on conservative estimates (ie, not underestimating the possible frequency or severity) of historical events in the region in which the project is located."

The Non-Permanence Risk report provide by Project personnel does not include the appropriate evidence for frequency and significance of events for the natural risks in the Project Area. Please provide the appropriate evidence (as described above) for both the frequency and significance of events for the natural risks in the Project Area.

Client Response: The Project Areas for the Kasigau Phase I and Phase II REDD+ Projects is located in Southeastern Kenya. This region is not a prime area for forestry, industrial agriculture or development. As such there is very little research or publication on the ecosystem properties and dynamics in this region, including the main topics of the Natural Risk section of the VCS Non-Permanence tool. Therefore, there are no clear estimates of the frequency of and significance to forest biomass of the various natural disturbances listed in the VCS tool available from historical records, probabilities, remote sensing data, or peer-reviewed scientific literature. Wildlife Works has had a presence in the Project area for nearly 20 years, and several employees have lived in the region for more than 20 years. This has provided us with significant expertise gained from firsthand experience of the natural risk cycles and disturbance regimes that are present in this ecosystem and the effect of the disturbances on forest biomass. We have provided the auditor with written evidence to support the frequency and significance estimates that were made in the VCS Non-Permanence tool. This evidence relies on published data, where available, or where not, the documented first hand expertise of our Director of Social and Biodiversity Monitoring, Dr. Mwangi Githiru. This is the evidence that Wildlife Works has used to select conservative estimates of the frequency and significance for each of the natural risk categories in the VCS Non-Permanence tool.

Auditor Response: The audit team reviewed the literature provided by project personnel and included in section 2.2 of the verification reports and confirmed that they provide the information required by the risk tool with respect to natural risks. The information provided is sufficient for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.

NCR 2014.7 dated 08/28/2015

Standard Reference: VCS Non-Permanence Risk Report Template v3.1

Document Reference: Kasigau Phase I_VCS non-permanence risk report template, v3.1-5

Finding: The VCS non-permanence risk tool requires that "All instructions, including this introductory text, should be deleted from the final document. And "All sections must be completed using Arial 10pt, black, regular (non-italic) font."

There are a number of areas in which the instructions have not been deleted from the final document and therefore is not in conformance with the requirements of the template.

Client Response: The client responded outside the cover of this workbook.

Auditor Response: The updated risk report no longer contains the errors referenced in the initial finding have been adequately addressed. The updated risk report allows for closing this finding.

Closing Remarks: The Client's response adequately addresses the finding.