PROJECT REVIEW REPORT

This project review report includes findings raised during Verra's review of the project specified below. The VVB must address the findings before the project request can be considered for approval by Verra. The project review report will be made publicly available on the Verra Registry. Confidential information may be provided in separate attachments.

Project ID	562
Project Name	The Kasigau Corridor REDD+ Project Phase I – Rukinga Sanctuary
Review Type	Verification Approval
Program(s)	SD VISta Program
Verification Period	01 January 2022 – 31 December 2022
Project Proponent	Wildlife Works Carbon LLC
VVB	AENOR International S.A.U
Assessment Criteria	*Sustainable Development Verified Impact Standard, v1.0*
Date of First Issue	11 July 2024
Date of Second Issue	26 September 2024
Review Conclusion	Approved
Date of Final Issue	15 January 2025

FINDINGS

1	SDG Contributions		
	Issue The indicators used for reporting sustainable development (SD) contributions in Section 1 of the SD VISta monitoring report have the following issues: 1. Rows 1 and 2 are separate but the indicators contribute to the same SDG target 1.1. 2. Row 3 uses a self-defined indicator that is quantified in proportional/percentage terms, which does not reflect the absolute impact. 3. Row 9 claims to contribute to the welfare of primary/secondary-aged children. However, the indicator defined youth as only those between 15-24 years of age. 4. Row 10 claims benefits to "half the population" without giving a total number for the population. 5. Row 11, the indicator is based on a percentage of the total population without a total number of the population. 6. In row 12, the project proponent has used a self-defined indicator rather than using the one prescribed by the template for contributions to SDG 13. 7. In row 15, the indicator used is not suitable as the contribution fails to capture the proportion between the land area and forest area, as expected by the indicator used. 8. In row 16, the indicator provided is not as defined in the metadata. 9. Rows 15, 16, and 18 use "maintained" in the "Net Impact on the SDG Indicator" column, but the project's claim should either be increasing or decreasing the impact on a particular SD indicator. 10. In row 17, the project activity is not quantifying the contribution	**Round 1** VVB Response The PP has updated the MR in the following way: 1. Row 1 that is referred to here was deleted. Now, only row 2 contributes to SDG target 1.1 (now labelled as row 1). 2. Row 3 (now 2) has been updated with absolute numbers of households. 3. Row 9 (now 8) has been updated. 4. A total number has been added (Row 9). 5. A total number has been added (Row 10). 6. The indicator has been updated (Row 11). 7. The indicator has been updated (Row 13) and indicator 15.1. 8. The indicator has been updated; we removed the UN indicator number from our self-defined indicator. 9. Based on a conversation with Verra staff it was agreed that "maintained" is the most appropriate term for these indicators (Now rows 13, 14 and 16). Agreement to use of the term "Maintained" was based on a phone conversation with Verra staff where WWC made the case that we cannot expect all indicators to	Closed

	by claiming “significant reduction” to poaching. Action Required 1. The VVB must ensure the project proponent consolidates the contributions to the same SDG target in one row for ease of understanding. 2. The VVB must ensure the project proponent uses a more appropriate self-defined indicator in row 3 that uses absolute numbers to provide an accurate contribution in absolute terms. 3. The VVB must ensure the project proponent either uses a self-defined indicator in row 9 to contribute to the SDG target or selects an appropriate indicator from SDG 4 that better captures the project’s contribution. 4. The VVB must ensure the project proponent provides the number of beneficiaries or at least the total population to claim a contribution in row 10. 5. The VVB must ensure the project proponent creates a self-defined indicator in row 11 with the number of people impacted so that the extent of the impact is visible. 6. The VVB must ensure the project proponent, as required by the project description template, references SDG 13 in the target column and uses the indicator “Tonnes of greenhouse gas emissions avoided or removed” for climate change mitigation impacts in row 12. 7. The VVB must ensure the project proponent either uses Indicator 15.2.1: Progress towards sustainable forest management or creates a self-defined indicator in row 15. 8. The VVB must ensure the project proponent removes the SDG indicator number from the UN metadata in case it is a self-defined indicator or use the correct language corresponding to the SDG indicator used from the metadata. 9. The VVB must ensure the project proponent uses either increased or decreased for monitored contributions based on the direction of impact in rows 15, 16 and 18. 10. The VVB must ensure the project proponent claims quantifiable	either be increasing or decreasing, that for some “maintained” is the positive outcome. For example, the number of threatened species from the IUCN or the area of the project area under protection. Verra agreed with us on this and said that they would revise the template to include “maintained” as an option in the future. 10. The indicator has been updated (Row 15). Verra Response The indicators have been updated. This finding is closed.	

	impacts in alignment with the chosen indicator in row 17. Program Rule(s) *Sustainable Development Verified Impact Standard, v1.0,* Section 2.1.2*; SD VISta Monitoring Report Template, v1.0,* Section 1; UN Metadata		

2	Feedback and Grievance Redress Procedure		
	Issue 1. Section 2.2.7 of the monitoring report does not provide the project proponent's response to and redressal of the grievances received during the monitoring period. Action(s) Required 1. The VVB must ensure that the project proponent updates Section 2.2.7 of the monitoring report to describe how each grievance received wase responded to. 2. The VVB must provide an assessment and update the relevant section of the verification report accordingly. Program Rule(s) *Sustainable Development Verified Impact Standard, v1.0,* Section 2.2.15	**Round 1** VVB Response The following text summarizing WWC's response and redressal of the grievances received during the monitoring period is provided in section 2.2.7 (vi) of the SD VISta MR: "A total of 10 comments were received from the Project communities in the monitoring period. All submissions were made through suggestion boxes. Of these, the majority were requests or suggestions (59%) and project compliments (38%); the rest were a clarification request and a complaint. The complaint was related to human-wildlife conflicts and the claim that some community members had been harassed by Wildlife Works' rangers. To address this issues, Wildlife Works' community outreach and security departments organised a baraza (meeting) that included a friendly football match between the youths and the rangers where there were mutual discussions about the conflicts, where they	Closed

		originated from and how to avert them in future. Use of unnecessary force was also discussed and would be avoided in future in-line with the Wildlife Works' Security Policy and Procedures." The verification report has been updated accordingly.	
		Verra Response The VVB has provided the process of resolving all the grievances received.	

3	Reassessment of Sustainable Development Context		
	Issue: The project uses its original baseline scenario, even though ten years have passed since the original baseline scenario was established. The project proponent has not reassessed the baseline scenario or justified the use of the original baseline scenario. Action(s) Required 1. The VVB must ensure that the project proponent provides justification for the use of the original baseline scenario in the monitoring report. 2. The VVB must assess and provide its process, findings, and conclusions to ensure that the current baseline scenario is appropriately described and justified in the verification report.	**Round 1** VVB Response The Project Start Date is 01 January 2005. The original 10-year baseline validity period ended on 31 December 2014. In a letter dated 24 August 2018, Verra informed WWC that an exemption for the baseline reassessment was granted for the monitoring period 1 January 2015 – 31 December 2017 (M5). In another letter dated 30 January 2020, Verra informed WWC that another exemption from the baseline reassessment requirements was granted through 31 December 2019 (end of M6). For the project's 7th & 8th monitoring periods (2020 and 2021 respectively) WWC submitted additional exemption requests to Verra for an extension to the project's baseline. Verra granted approval of the	Closed

	Program Rule(s) *Sustainable Development Verified Impact Standard, v1.0,* Sections 2.1.8-2.1.9	baseline extension request for both M7 & M8. As a result, the project's new baseline reassessment date became 01 January 2022 after the initial 10-year period and the exemptions granted to the Project by Verra. For the Project's ninth monitoring period, WWC submitted another exemption request to Verra on 23/1/2023 requesting approval for another extension to the project's baseline through calendar year 2022 corresponding to M9.While Verra did not provide WWC with a formal response, in the baseline extension approval letter provided by Verra for M8 (2021) issued to WWC on 26 April 2022 it states, "*The project baseline reassessment date was 01 January 2022 after the ten-year requirement and exemptions granted to the project; therefore, the project must reassess its baseline one year after the release of the updated AUDD methodologies*." This implies that the baseline would only need to be reassessed within one year after the release of the updated AUD methodologies. The M9 VCS / CCB verification was formally approved by Verra on 16 October 2023. Verra did not release the updated AUD methodology before the completion of the M9 verification, and the VM048 Methodology was officially approved on 27 November 2023. Therefore, the baseline extension approval letter from Verra date 26 April 2022 demonstrates the project's baseline was still valid for the Project's ninth monitoring period (01 JAN – 31 DEC	

		2022), which corresponds to the project's 2nd SD VISta monitoring period. We acknowledge that the extended period of baseline validity granted by Verra is not described in the SD VISta M2 MR. Therefore, we have updated Section 4.3 of the MR with the following text. "Quantification of the emission reductions generated by the Project is based on the validated baseline. The project baseline reassessment date was 01 January 2022 after the ten-year requirement for baseline reassessment and exemptions granted to the project by Verra. The project received an exemption from the baseline reassessment requirement from Verra allowing us to postpone this until the 10th monitoring period (calendar year 2023). This exemption is based on the project's intent to nest into the Kenyan national REDD+ programme, which is not yet complete." Additional information has also been included in the verification report.	
		<u>Verra Response</u> The VVB has provided details about exemptions requested for baseline reassessment in the VCS/CCB context. However, this finding cannot be closed. <u>Issue</u> The requirement for baseline reassessment in this finding concerns SD VISta and, hence, the sustainable development contributions of the project that are beyond SDG 13. The details for exemptions provided by Verra in the above VVB response do not include exemption from reassessing the	

		entire sustainable development context. Action(s) Required 1. The VVB must ensure that the project proponent provides justification for the use of the original baseline scenario for all sustainable development contributions in the monitoring report. 2. The VVB must assess and provide its process, findings, and conclusions to ensure that the current baseline scenario is appropriately described and justified in the verification report for all sustainable development contributions. Program Rule(s) *Sustainable Development Verified Impact Standard, v1.0,* Sections 2.1.8-2.1.9	
		Round 2 VVB Response Following clarification from Verra on the need to reassess the baseline conditions in the context of sustainable development contributions and beyond just the GHG baseline scenario, the Proponent has reassessed the current status of the project communities and stakeholders well-being, natural capital and ecosystem services. Using information gathered during updated Social and Biodiversity Impact Assessment workshops conducted with the communities of the Kasigau Projects held in 2017, 2021 and most recently in 2023, the Proponent has determined project baseline is still valid and represents the current context and status of the project communities and stakeholders and that of the	

		broader environmental and biodiversity circumstances in the project area. The following text has been added into section 2.1.2 of the SD VISta M2 MR document. As it has been over 10 years since the project start date, the project has reassessed its baseline as required by the SD VISta standard. As part of the on-going adaptive project management and on-going consultation with project communities SBIA workshops are held every 2 years, with the project focal issues and theory of change reassessed every five years. During these workshops monitored project impacts and results are shared with project communities and stakeholders and jointly discuss general aspects of the project implementation and make any amendments to the key goals and processes. During these meetings community representatives from the various project locations are also able to interact, exchange ideas and experiences about the project implementation processes, institutional functions and other lessons learned, and provide feedback to the project. These SBIA workshops have confirmed that the original project baseline as validated under the VCS, CCB and SD VISta standards is still valid for the entire project area based on the current status of the project communities and stakeholders well-being, natural capital and ecosystem services. The SBIA workshops that have additionally reassessed project focal issues	

		and the theory of change have been as said before, with a frequency of two years, with the most recent in 2023. During the 2017 it was discovered that only one focal issue, that of Poor governance, that had been identified at project development was no longer identified as a significant issue by the workshop members and was replaced by a new focal issue of food insecurity. In the 2023 SBIA workshop all focal issues and the project's theory of change were confirmed by workshop participants as still valid and pressing issues. This process demonstrates that the project baseline is still valid and represents the current context and status of the project communities and stakeholders and that of the broader environmental and biodiversity circumstances in the project area. AENOR has reviewed the conclusions of the maintenance of the baseline, together with the SBIAs reports, and confirms that the information is correct according to the testimonies gathered during the onsite visit and the review of previous Monitoring and Verification reports. The VR has also been updated accordingly.	
		<u>Verra Response</u> The use of the original baseline has been justified by the VVB, and the project documents are updated. This finding is closed.	