Certification for a Sustainable World ™

FINAL CCBA PROJECT VALIDATION REPORT

KASIGAU CORRIDOR REDD PROJECT
TAITA TAVETA, KENYA

WILDLIFE WORKS CARBON LLC

December 22, 2009

Validation Conducted by:

Scientific Certification Systems
Greenhouse Gas Verification Program
2200 Powell St. #725, Emeryville, CA 94608 USA
Tel. 510.236.9016 • (Fax) 510.236.8598 • www.scscertified.com

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1.0 Introduction

This report presents the findings of an audit conducted by Scientific Certification Systems (SCS), to validate the claim made by Wildlife Works Carbon LLC that the Kasigau Corridor REDD Project conforms to the Climate, Community and Biodiversity Project Design Standards (Second Edition). Scientific Certification Systems (SCS) has been accredited by the Climate, Community & Biodiversity Alliance (CCBA) to perform such validation audits.

1.1. Contact Information

Project Developer contact information:

Mike Korchinsky
Wildlife Works Carbon LLC
425 Market Street, 26th Floor
San Francisco, CA 94105
Tel. 415.332.8081
mike [at] wildlifeworks.com

Scientific Certification Systems contact information:

Todd Frank, Program Manager, GHG Verification Services
Scientific Certification Systems
2200 Powell Street, No. 725
Emeryville, CA 94608 USA
Tel. 510.236.9016
tfrank [at] scscertified.com

Auditor contact information:

Kyle Holland, Verification Forester, GHG Verification Services
Scientific Certification Systems
2200 Powell Street, No. 725
Emeryville, CA 94608 USA
Tel. 510.236.9015
kholland [at] scscertified.com

Alex Obara, Kenyan Forestry Specialist
alexobara [at] hotmail.com

Client contact information:

Mike Korchinsky
Wildlife Works Carbon LLC
425 Market Street, 26th Floor
San Francisco, CA 94105
Tel. 415.332.8081
mike [at] wildlifeworks.com

1.2. Objective

The validation objective is an independent assessment by SCS of the proposed project activities against all criteria defined by the Climate Biodiversity and Community Alliance (CCBA). Validation by SCS concludes with an opinion of whether the project activities are 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 rests with CCBA.

1.3. Scope and Criteria

The project was assessed against the CCB Standards Second Edition to determine which of the fourteen required and three optional CCB Standards criteria the project satisfies. An "Approved" project is one which satisfies all fourteen of the required CCB Standards criteria.

The scope of services described in this report encompasses an analysis of data and calculations as presented at the time of inception of project validation. The SCS Lead Auditor issued one or more New Information Requests (NIRs) or Non-Conformity Reports (NCRs), as needed, and analyzed responses to these findings by the Project Proponent. As necessary based on the adequacy of responses, the Lead Auditor issued additional findings.

1.4. Project Description

The Kasigau Corridor REDD Project ("the project") is located in Coast Province, Taita Taveta District, Kenya, approximately two hours northwest of Mombasa, Kenya. The project area is between Tsavo East and Tsavo West National Parks and functions as a critical wildlife corridor between the two parks. There are several communities located near the project area in the project zone. The project area is primarily low density forestland, shrubland and grassland savannah.

This land is a private leasehold estate given by the Government of Kenya to Rukinga Ranching Company Ltd. The majority shareholder of Rukinga Ranching Company is BenBo International, an offshore trust. There are 46 shareholders of Rukinga Ranching Company, including BenBo International. BenBo international was established by a principal investor of both Wildlife Works Inc. and Wildlife Works Carbon LLC. Wildlife Works Inc. is an export processor of consumer goods to retail markets in Europe and the United States. Wildlife Works Inc. supports the conservation of wilderness habitats, the creation of jobs and the construction of schools.[1] Wildlife Works Inc. was granted a conservation easement from Rukinga Ranching Company in 2009 after the project start date of January 1, 2006. This easement effectively transferred all carbon and biodiversity rights from Rukinga Ranching Company to Wildlife Works Inc. Wildlife Works Inc. and Wildlife Works Carbon LLC have initiated or will initiate the project activities and collectively these entities are referred to as "the project proponent" in the context of project activities in this report.

Major project activities in the project area include the protection of the wildlife corridor, wildlife habitat and carbon stocks. Major project activities in the project zone relate to the surrounding communities

[1] See http://www.wildlifeworks.com/mission/mission.html

and include greenhouse-based tree production, agricultural outreach, employment and the construction of schools. The project lifetime and crediting period are 20 years.

1.5. Summary of Validation Conclusion

Following completion of SCS's duly-accredited validation process, it was concluded that The Kasigau Corridor REDD Project conforms to the CCBA Climate, Community and Biodiversity Project Design Standards (Second Edition) at the Gold Level (see Appendix A). Findings were made during the course of the audit and were subsequently closed; in total, there were 20 Non-Conformity Reports (NCRs), 5 New Information Requests (NIRs) and 5 Opportunities for Improvement (OFIs).

2.0 Methodology

The audit commenced on September 25th with an opening meeting and a desk review of the Project Design Document (PDD). The site visit occurred the week of October 12th and included meetings with Wildlife Works management, employees, Rukinga Ranching Company shareholders and community members. Field tours were conducted of the project area and project zone. Following the site visit and upon further review of the collected evidence, public comments and PDD, several audit findings were issued. Audit findings were issued as NCRs, NIRs and OFIs. The Project Proponent was allowed a period of time to respond to the issued NCRs and NIRs. Upon the close of this period or the receipt of satisfactory responses, the draft report was issued on December 21st. The project proponent was allowed to comment on the draft report prior to the submission of the final report to CCBA. All comments made by the project proponent were considered but not all were incorporated into the final report.

2.1. CCB Standards

The Project was validated against the CCB Climate, Community and Biodiversity Project Design Standards (Second Edition) ("the Standard"). The Standard requires conformance to 14 criteria in each of 4 categories: 1) General (5 criteria), 2) Climate (3 criteria), 3) Community (3 criteria), and 4) Biodiversity (3 criteria). In addition, applicants achieve a higher level of validation by conforming to at least one of three criteria in the Gold Level section. Projects with Gold Level status meet the core required criteria and at least one optional Gold Level criterion of the Standard.

2.2. Auditor Qualifications

Lead Auditor: Kyle Holland, SCS Verification Forester

Mr. Holland is a Certified Forester (#3770) and biometrician specializing in forest inventory, modeling and remote sensing. Prior to joining SCS, Kyle worked with the Potlatch Corporation as a Resource Supervisor. Kyle has also worked with the Chesapeake Bay Program, the State of Maryland and the State of Wisconsin as a specialist in riparian forestry and forest management auditing. Mr. Holland is currently completing his Ph.D. in biometrics and statistics at the University of California, Berkeley. Kyle holds a M.S. in biometrics and remote sensing from Berkeley, and degrees from the University of Minnesota and the University of Idaho in forestry and forest engineering, respectively. He also holds professional memberships with the Society of American Foresters, the American Society for

Photogrammetry and Remote Sensing, the Institute of Mathematical Statistics and the International Environmetrics Society. Mr. Holland has conducted numerous verification and validation activities under FSC, CCX, CAR, CCB and VCS. Mr. Holland is also an approved AFOLU expert for IFM and REDD projects under VCS.

Auditor: Alex Oginga Obara, Kenyan Specialist and SCS Contractor
Mr. Obara is a native of Kenya specializing in forestry and wildlife management. He holds a B.Sc .degree in Forest and Wildlife Management from the Moi University, Kenya, and a M.Sc. degree in Conservation Biology from the Durell Institute of Conservation and Ecology at the University of Kent in Canterbury, United Kingdom. Alex also holds certificates in Biodiversity Measurement and Monitoring, Environmental Leadership and Communication Skills from the Smithsonian Institute, Virginia. Mr. Obara has broad experience in forest research, forest biometrics, landscape restoration, resource management and ecological monitoring obtained from his work with the Masai Mara National Reserve in Kenya, UNDP, UNIDO, WWF, the World Bank/GEF and Nippon Koei Co., Ltd.

2.3. Audit Process

The audit process included the following timeline of events and activities:

- Opening meeting, introduction and project orientation (via conference call) on September 25th;
- Desk review of PDD and supplemental documentation including maps, data and models;
- Site visit from October 13th – October 17th;
    - Project overview and orientation
    - Interviews with Wildlife Works management;
    - Interviews with Wildlife Works employees;
    - Interviews with Rukinga Ranching Company shareholders;
    - A community meeting;
    - Field tours of local communities;
    - Interviews with community members;
    - Tours of local schools;
    - Interviews with local school teachers and administrators;
    - Field tours of the project area;
    - Tours of facilities and agricultural plantings;
    - Closing meeting and presentation of preliminary findings;
- Review of stakeholder comments;
- Review of collected evidence and supporting documentation;
- Issuance of findings on October 2nd and November 11th;
- Project proponent responses to findings;
- Preparation of draft report;
- Technical review of draft report;
- Comment on draft report by project proponent; and
- Submission of final report to CCBA.

3.0 Stakeholder Comments

The Project Design Document (PDD) was posted on the CCBA website on September 9th and the public comment period extended through October 9th. Comments were received from thirteen parties (see Appendix B).

Written comments were received from the following stakeholders:

- James Ruwa, GAFFER HIV/AIDS Project Coordinator
- Kenneth Nyange, Project Manager – Camp Tsavo
- Peterson Msinga Mwatate, Head Teacher - Kale primary school
- Renson Dio, Director - Taita Ranching Co. Ltd.
- Engineer C.M Mwakulomba
- Sylvester Izaka, IT & Network support engineer
- Rehema Mwavuo, Volunteer Teacher – Marungu Secondary School
- V Wambua Masai, Teacher and Instructor
- Antony Lundi, Voi constituency – Maungu office
- Chief DUNCAN, Marungu Location as addressed to the Manager Wildlife Work
- Briviant Shako – Technical Works
- Pascal Kizaka, Chief of Kasigau Location, Voi/Kenya
- Driscilah M. Ngele, Assistant Chief's Office

All comments have been addressed by the auditor in this report. General themes included:

- Overwhelming support for the project's climate, community and biodiversity benefits;
- Support for the protection of wild animals;
- Support for the greenhouse nursery program;
- Support for the school bursary program;
- Support for the construction of new schools and additions;
- Recognition of Wildlife Work's engagement with the community and community organizations;
- Acknowledgement of the potential risks to the project area under the without-project scenario, namely deforestation, conversion to agriculture and charcoal production;
- Appreciation for the intrinsic value of the project area; and
- Appreciation for employment opportunities offered by Wildlife Works.

3.1. CCB Validation Findings

The evidence and findings presented in this report address the criteria of the Standard by indicator. For each criterion, the Standard specifies indicators for which findings are issued; findings are documented and issued to the project proponent as Non-Conformity Reports (NCRs), New Information Requests (NIRs) and Opportunities for Improvement (OFIs). In the case of non-conformance, the NCR clearly stipulates the deficiency or lack of evidence posed by the project in the context of one or more indicators. NCRs indicate broad non-conformance at the criterion level that must be satisfied prior to project validation while NIRs and OFIs are less material. In the case of a NIR, the finding is to obtain additional evidence to support the conformance of the project to an indicator. The project proponent

must respond to all NIRs before the close of the audit. In the case of an OFI, the finding is an observation that may help the project proponent to improve their project. OFIs are optional however may evolve into NCRs over time. Given the overlapping nature of the Standard's indicators, a single finding may address multiple indicators and criteria. In this report, findings are presented in order of criterion and cross referenced subsequent to presentation.

Initially and upon conclusion of the audit, the project proponent collated information about the project and how the project addresses the Standard in a document titled *The Kasigau Corridor REDD Project Phase I – Rukinga Sanctuary*, ultimately dated December 2009. This document is available to the public on the CCBA website (http://www.climate-standards.org). This document is referred to as the Project Design Document (PDD).

3.2. General Section

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

3.2.1. 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.

Indicator G1.1. The location of the project and basic physical parameters (e.g., soil, geology, climate).

Findings: The location of the project area is described in the PDD. The basic physical parameters of the project area and project zone are described in the PDD. Descriptions of the climate, soils and geology are found in Section G1.1 of the revised PDD.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator G1.2. The types and condition of vegetation within the project area.

Findings: Both the types and conditions of vegetation in the project area are described in the revised PDD. Initially, the PDD lacked descriptions of the "OUT" and Boma vegetation types. Observations made during the site visit indicated that these types were noticeably different than the vegetation types presented in the original PDD (see NCR Number 1 of 19 for October 20, 2009). The stocking level of trees and shrubs in the "OUT" type was less than the other types presented in the original PDD.

Likewise, many Boma or cattle corrals were observed during the site visit. The vegetation conditions in the corrals were noticeably different than the vegetation types presented in the original PDD. A complete description of the vegetation types and conditions is in Section G1.2 of the revised PDD.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 1 of 19 for October 20, 2009

Finding: The project proponents have omitted descriptions of some vegetation types and conditions within the project area. The description must include these types and conditions of vegetation within the project area.

Proponent Response on October 24, 2009: We have updated the description in section G1.3, and G3.3 of the PDD to refer to a new map for the Project Zone added in Annex 1. We have added the new map to Annex 1, which clearly indicates the boundary of the Project Zone for the Kasigau Corridor REDD Project, with Phases I and II clearly indicated. We have also emailed the Validator a separate map image and a KMZ file covering this area. We include the PDD text below.

We believe that this is a complete and adequate response to this NCR #19 and we ask that the NCR #19 be closed.

Validator Response: The revisions made to the PDD are adequate.

New Information Requests: None

Opportunities for Improvement: None

Indicator G1.3. The boundaries of the project area and the project zone.

Findings: Descriptions of the boundaries of the project area and project zone are given in Section G1.3 of the revised PDD. The project zone includes the land that falls between Tsavo East National Park and Tsavo West National Park south and east of Voi town, and includes the communities of Maungu, Itinyi, Buguta, Marungu, Kale, Mwakasinyi, Sasenyi and the privately held group ranches of Kasigau, Taita, Amaka, Maungu, Mgeno, Kambanga, Wangala and Buchuma. A map of the project zone is provided in the revised PDD (see NCR Number 19 of 19 for October 20, 2009).

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 19 of 19 for October 20, 2009

Finding: The boundaries of the project zone are provided as a description; however the boundaries of the project zone should be clarified with an explicit map for Phase I.

Proponent Response on October 24, 2009: We have updated the description in section G1.3, and G3.3 of the PDD to refer to a new map for the Project Zone added in Annex 1. We have added the new map to Annex 1, which clearly indicates the boundary of the Project Zone for the Kasigau Corridor REDD Project, with Phases I and II clearly indicated. We have also emailed the Validator a separate map image and a KMZ file covering this area. We include the PDD text below.

We believe that this is a complete and adequate response to this NCR #19 and we ask that the NCR #19 be closed.

Validator Response: The new map provided in the revised PDD is adequate.

New Information Requests: None

Opportunities for Improvement: None

Indicator G1.4. Current carbon stocks within the project area(s), using stratification by land-use or vegetation type and methods of carbon calculation (such as biomass plots, formulae, default values) from the Intergovernmental Panel on Climate Change's 2006 Guidelines for National GHG Inventories for Agriculture, Forestry, and Other Land Use or a more robust and detailed methodology.

Findings: The project uses a VCS methodology (currently not approved by VCS and currently under the double-approval process at the time of this report) and the VCS methodology conforms to IPCC guidelines. Stratification and a sample of plots are used to estimate the current carbon stocks within the project area. This method for estimating carbon stocks is the greatest level of detail specified by IPCC as Tier 3.

Diameter measurements, stem counts and allometric equations are used to estimate the aboveground biomass. Belowground biomass is estimated using ratios of above-to-belowground relative biomass from the IPCC guidance document. The allometric equations for above ground biomass were parameterized using a purposive sample within common species groups. The sample appeared to be representative of the entire project area. The allometric equations for aboveground biomass were not cross-validated for over fitting or selected using any statistical criteria. Given the limited number of allometric equations available in the literature for this region of the continent, the constructed equations seem adequate.

Soil organic carbon was estimated using a simple random sample of soil cores analyzed by a third party. This method for estimating soil carbon appears to be adequate. The project proponent assumes that the soil organic pool will remain constant throughout the life of the project, which is a reasonable assumption.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

Opportunities for Improvement: None

New Information Requests: None

Indicator 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.

Findings: The revised PDD contains a description of all the communities located in the project zone, specifically in Section G1.5. There are several communities in the project zone: Maungu, Itinyi, Buguta, Marungu, Kale, Mwakasinyi and Sasenyi. These communities are rural Taitan and the economies of these communities are small service businesses, small shops and bars. Wildlife Works is the only formal employer in the project zone other than the school district. Given the limited diversity in socioeconomic conditions and culture, the provided description is adequate.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator G1.6. A description of current land use and customary and legal property rights including community property in the project zone, identifying any ongoing or unresolved conflicts or disputes and indentifying and describing any disputes over land tenure that were resolved during the last ten years (see also G5).

Findings: A description of the current land use, customary and legal rights is provided in the revised PDD in Section 1.6. The description includes a history of the national system for land tenure and a recent history of the legal property rights of Rukinga Ranching Company. The description also includes information about a solved dispute between emigrant Duruma which resulted in the sale of a portion of the ranch now called the Sasenyi Valley Land Cooperative, prior to the project start date. Any outstanding conflicts are relatively minor and involve transient cattle herders, mostly from Somalia.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: The biodiversity diversity description provided in Section G1.7 of the revised PDD is comprehensive and adequate. The biodiversity description includes information about the ecosystem, habitat and wildlife found within the project zone. Initially, the PDD lacked references to literature containing descriptions of the methodologies by which biodiversity was assessed (see NIR Number 1 of 5 for October 20, 2009).

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests:

NIR Number 1 of 5 for October 20, 2009

Finding: The project proponent has provided a description of biodiversity assumed to be partially based on a literature review. A literature review is an appropriate methodology, however the project proponent must provide appropriate reference material to substantiate this methodology, if possible.

Proponent Response on October 30, 2009: We have revised sections G1.7 of the PDD to include the text below, and have sent the Validator the references described in the text. We believe that this new information provided to the Validator is a more than adequate response to your finding and meets the Standard and we ask that you consider this finding NIR#1 closed.

Validator Response: The provided references indicate the use of appropriate methodologies and are therefore adequate.

Opportunities for Improvement: None

Indicator 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:

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).

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;

8.3. Threatened or rare ecosystems;[16]

8.4. Areas that provide critical ecosystem services (e.g., hydrological services, erosion control, fire control);

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
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).

Findings: The revised PDD contains several descriptions of HCVs including threatened and endangered species; the sanctuary as a corridor for significant concentrations of species; the area as a unique dryland ecosystem; and Mount Kasigau which is used by the local population is a unique place on the landscape. Initally, the PDD lacked information about Mount Kasigau however it was subsequently amended (see NCR Number 2 of 19 for October 20, 2009). The importance of Mount Kasigau to the local communities was discovered during the course of the site visit.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 2 of 19 for October 20, 2009

Finding: The project zone includes at least one area that provides critical ecosystem services such as hydrological and climate services that are not included in the description of the project zone in the PDD. There are areas in the project zone that function as threatened ecosystems and are fundamental to meeting the basic needs of local communities. The project proponent must include all HCV areas in the description. Also, the project proponent must demonstrate that the project design includes specific measures to ensure the maintenance or enhancement of these additional HCVs and that these areas will not be negatively affected by the project. These additional HCV areas must be assessed as part of community and biodiversity impact monitoring.

Proponent Response on October 30, 2009: We have revised sections G1.8, G3.6, CM1.2, CM3.2 and B3.2 of the PDD to include the text below, and have sent the Validator the references described in the text.

We believe that this new information provided to the Validator is a more than adequate response to your finding and meets the Standard and we ask that you consider this finding NCR#2 closed.

Validator Response: The supplemented PDD is adequate.

New Information Requests: None

Opportunities for Improvement: None

3.2.2. 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:

Indicator 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.

Findings: The PDD provides a clear description of the identified land-use scenario in the absence of the project. The land-use scenario in the absence of the project is slash and burn agriculture which is clearly supported by condition of nearby, unprotected areas which have been cleared of forestland. Based on interviews with community members conducted during the site visit, the selected land-use scenario is very plausible. Also based on interviews conducted during the site visit, it is apparent that slash and burn agriculture would proceed rapidly without the project.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: During the site visit, the benefits of the project were confirmed by interviews with local community members. The PDD clearly documents the project benefits would not occur in the absence of the project. During the site visit, interviews with local authorities confirmed that the existing laws and regulations would not affect the likely land-use without the project as there are no laws which are enforced to prevent the conversation of forestland to agriculture. The term agriculture is used loosely in the PDD and this report, and it implies both traditional agriculture and pastoralism.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.[19] The timeframe for this analysis can be either the project lifetime (see **G3**) or the project GHG accounting period, whichever is more appropriate. Estimate the net change in the emissions of non-CO_2 GHG emissions such as CH_4 and N_2O in the 'without project' scenario. Non-CO_2 gases must be included if they are likely to account for more than 5% (in terms of CO_2-equivalent) of the project's overall GHG impact over each monitoring period.

Projects whose activities are designed to avoid GHG emissions (such as those reducing emissions from deforestation and forest degradation (REDD), avoiding conversion of non-forest land, or certain improved forest management projects) must include an analysis of the relevant drivers and rates of deforestation and/or degradation and a description and justification of the approaches, assumptions and data used to perform this analysis. Regional-level estimates can be used at the project's planning stage as long as there is a commitment to evaluate locally-specific carbon stocks and to develop a project-specific spatial analysis of deforestation and/or degradation using an appropriately robust and detailed carbon accounting methodology before the start of the project.

Findings: The estimated carbon stock changes associated with the 'without project' reference scenario are presented in Section G2.3 using an estimated rate measured from historical Landsat imagery taken in 1995 and 1999. The rate is assumed to be linear in population size and population growth is assumed to be linear in time. The latter of these assumptions is probably false (see OFI Number 1 of 4 for October 20, 2009), however the overall estimated deforestation rate is probably conservative based on evidence from the site visit. Interviews with local community members indicated that the entire project area would likely be deforested in a very short period of time under the 'without project' scenario. An analysis of the relevant drivers of deforestation is also presented in Section G2.3 of the PDD. Overall and despite the shortcomings of the deforestation model, the estimated carbon stock changes under the 'without project' scenario are reasonable and conservative.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement:

OFI Number 1 of 4 for October 20, 2009

Finding: Whether valid or not, the model is conservative based on the evidence from the site visit. However, the model for deforestation could be improved by examining the deforestation rates elsewhere, in similar areas, and by examining the assumptions of linear population growth and considering economic drivers.

Proponent Response on October 24, 2009: Kenya conducts a census every 10 years. As a result it is not possible to identify the population growth model for the Project Zone in the 10 years immediately preceding Wildlife Works arrival in anything other than a linear model. There is simply no evidence to support another model. There are no National or sub-national deforestation rates published for Kenya and we believe that if there were, our Project Zone would be demonstrated to have as high or higher a deforestation rate as anywhere in Kenya over the ten years prior to our arrival. There are few similar Dryland Forests being cleared for Slash and Burn Agriculture in Kenya, and most of those remaining are in the Leakage Belt of this Project and will be addressed during Phase II of this project.

Validator Response: Population size over time is usually estimated using an exponential model.

Indicator 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.

Findings: Based on the PDD and the site visit, there would be obvious non-improvements in employment, subsistence agriculture and education under the without project scenario. Changes in water, soil and other locally important ecosystem services would greatly impact communities in the project zone as described in Section G2.4 of the PDD.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator 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).

Findings: Given the habitat conditions present outside the project area and the project zone which are reflective of the without project scenario, there are obvious affects on biodiversity in the absence of the project. These effects are directly related to the project area as a critical habitat and a wildlife corridor between the two national parks and are described in Section G2.5 of the PDD.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

3.2.3. 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:

Indicator G3.1. Provide a summary of the project's major climate, community and biodiversity objectives.

Findings: A summary of the major climate, community and biodiversity benefits are listed in Section G3.1 of the PDD. These objectives broadly include the protection of the project area, long-term sustainability, investment and outreach.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator G3.2. Describe each project activity with expected climate, community and biodiversity impacts and its relevance to achieving the project's objectives.

Findings: Section G3.2 is described in the revised PDD. Initially upon completion of the site visit, several project activities were identified but missing from the original PDD (see NIR Number 2 of 5 for October 20, 2009). These activities clearly contributed to the net positive impact of the project and were therefore material to the validation. Subsequent to the initial findings of the audit, the revised PDD was amended to include all relevant project activities. The project proponent also provided an implementation schedule for project activities to demonstrate their feasibility to achieving the project's objectives (see Indicator G3.5).

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests:

NIR Number 2 of 5 for October 20, 2009

Finding: The PDD describes some project activities, however during the site visit, several project activities were identified that were not included in the PDD. These project activities provide evidence to support the net positive impact of the project. The project proponent must provide a complete list of project activities. Also, a general implementation schedule for all project activities must be included in sufficient detail for third-party evaluation.

Proponent Response on October 30, 2009: We have developed a detailed Project Activity List and Implementation Schedule and have sent that to the Validator. This schedule shows specific Project Activities, their start and end dates, and capital and operating budget amounts for their implementation which are then picked up in the detailed Project Cash Flow provided to the Validator under NCR#6.

We have also revised the text of Sections G3.2 and G3.4 to reflect the additional detail about the project activities that the Validator is referring to in this NIR.

Validator Response: The supplied list is inclusive of all relevant project activities and the supplied implementation schedule shows milestone by which the project can be verified.

Opportunities for Improvement: None

Indicator 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).

Findings: The revised PDD contains maps of the project area and the project zone. The original PDD was missing a map of the project zone which was subsequently added (see NCR Number 19 of 19 for October 20, 2009). The maps in the revised PDD also show the surrounding communities which are predicted to be impacted by the project activities.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 19 of 19 for October 20, 2009

New Information Requests: None

Opportunities for Improvement: None

Indicator G3.4. Define the project lifetime and GHG accounting period and explain and justify any differences between them. Define an implementation schedule, indicating key dates and milestones in the project's development.

Findings: The project lifetime and the GHG accounting period are defined in Section G3.4 of the PDD. The project lifetime and GHG accounting period are the same. Initially, key dates for the implementation of project activities were undefined but were subsequently presented during the audit (see NIR Number 2 of 5 for October 20, 2009). The supplied implementation schedule is important to verify project activities during the project lifetime.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: See NIR Number 2 of 5 for October 20, 2009

Opportunities for Improvement: None

Indicator 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.

Findings: A list of major risks to expected climate, community and biodiversity benefits and outlined measures are presented in Section G3.5 of the revised PDD. Initially, several risks were identified during community meetings but were omitted from presented list (see NCR Number 3 of 19 for October 20, 2009). The list was augmented in response to findings and the augmented list adequately includes all identified risks and outlines measure adopted to mitigate identified risks.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 3 of 19 for October 20, 2009

Finding: The PDD describes some major risks, however other natural and human induced risks also exist. Based on community meetings and interviews, other potential risks are drought on wildlife, drought on fruit tree plantings and invasion of people into the project area because of desirable grazing areas. These are likely risks that must be addressed in sufficient detail for third party evaluation.

Proponent Response on October 30, 2009: We have revised sections G3.5 of the PDD to include the text below, to provide additional risks and mitigation strategies. We believe that this new information provided to the Validator together with the additions made to Section GL1.2 in response to finding NCR#18 and previously provided is a more than adequate response to your finding and meets the Standard and we ask that you consider this finding NCR#3 closed.

Validator Response: The revised PDD now includes all identified risks and likewise presents mitigation strategies.

New Information Requests: None

Opportunities for Improvement:

OFI Number 2 of 4 for October 20, 2009

Finding: The PDD describes the potential risk of fire and some mitigation activities for this risk. The project proponent may also consider constructing effective firebreaks as an additional mitigation activity, especially given the evidence of recent fire in the project area, observed during the site visit .

Proponent Response on October 24, 2009: Fire breaks are unfortunately fairly ineffective in this area against the worst fires, as evidenced by the fact that in 1998 fire jumped the Main Mombasa Highway to enter into the Project Area from the North boundary, a distance including the road reserve of some two hundred meters. This is because in high fire risk periods, smoldering elephant dung becomes airborne and can travel on the wind some significant distance to relight dry grass on the other side of the firebreaks.

Validator Response: NA

Indicator 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.

Findings: The revised PDD demonstrates that the project design includes specific measures to ensure the maintenance and enhancement of HCV in the project zone. In response to an initial finding issued for missing HCV values under Indicator G1.8, Section G3.6 of the revised PDD contains references to Mount Kasigau (see NCR Number 2 of 19 for October 20, 2009). The project design does not adversely affect the maintenance of HCV in the project zone.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 2 of 19 for October 20, 2009

New Information Requests: None

Opportunities for Improvement: None

Indicator G3.7. Describe the measures that will be taken to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime.

Findings: The PDD describes three measures that will be taken to maintain and enhance the project benefits beyond the lifetime of the project: long-term job creation, long-term financial health and relatively permanent conservation easement. These measures clearly maintain and enhance the project benefits beyond the lifetime of the project.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator 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 revised based on such input. A plan must be developed to continue communication and consultation between project managers and all community groups about the project and its impacts to facilitate adaptive management throughout the life of the project.

Findings: Several stakeholder groups potentially affected by the project activities were involved in the project design both formally and informally. Formal documentation was observed for the involvement of the shareholders of the Rukinga Ranching Company. Community groups were involved as well but no formal documentation was made regarding their involvement in project design. Based on interviews with community members, the project does not appear to be disrespectful of local customs and values. Also, the project appears to maintain HCV.

Given the overall lack of documentation regarding the involvement of stakeholders, it was unclear if all the shareholders of Rukinga Ranching Company clearly supported the project. Given the materiality of shareholder rights to the project area and based on the evidence collected during the site visit, it was found that the project proponent needed to clearly document the support of the shareholders for the

project (see NCR Number 1 of 1 for November 12, 2009). This evidence was further material to the conformance of the project to Indicators G5.3 and G5.6. The presented documentation supported conformance to this indicator in the context of the shareholders, however there was sufficient lack of evidence regarding the documentation of other stakeholders groups.

In response to an initial finding, the project proponent has enacted a plan to communicate the project with all identified community groups (see NCR Number 4 of 19 for October 20, 2009). This plan entails documentation on dialogs and adaptive management. However given the lack of documentation on the involvement of stakeholders, in general, to the design of this project, here is insufficient evidence for conformance to this indicator. However because no community benefits, stakeholder benefits, local customs, local values or high conservation values appear to be negatively affected by the project design, this finding is immaterial to conformance with the criterion.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 4 of 19 for October 20, 2009

Finding: Provide documentation of stakeholder dialogs and describe how the project proposal was revised, if it was revised. The project proponent must also develop a plan to continue communication with all community groups. This documentation and the plan must be addressed in sufficient detail for third party evaluation.

Proponent Response on November 1, 2009: We have significantly enhanced Section G3.8 to be much more specific about past meetings in the formulation of the REDD project, and to demonstrate a plan for more formal monitoring going forward. The text of that section is included below. We believe this represents a complete and acceptable response to your finding and meets the standard and we ask that you close finding NCR#4.

Validator Response: The project proponent has enhanced Section G3.8, however there is insufficient documented evidence that all stakeholder groups were involved in project design. The plan for more formal monitoring should be sufficient for future documentation under Criterion G3.

NCR Number 1 of 1 for November 12, 2009

Finding: The legal framework for the Carbon Easement is clear; however, no documentation has been provided demonstrating that the project is undertaken on behalf of the carbon owners with their full consent. The only evidence of consent is legal documentation, the Carbon Easement, stemming from a convention of shareholders, not all of whom might have been present at the meeting. As no documentation to the effect of attendance has been provided, it is unclear whether all shareholders were present at the AGM and whether all gave their full consent.

Further based on supplemental guidance provided by CCBA, consultation with those whose rights will be affected by the project is required. Clearly, the Carbon Easement affects the right of all the shareholders. No documented evidence, other than legal evidence, has been provided to demonstrate

that the project will not encroach uninvited on the rights of all shareholders. Likewise, no documented evidence has been provided regarding the free, prior and informed consent of all shareholders.

Please provide documentation that all known shareholders were present at the AGM and gave their full consent or please provide an opportunity to all shareholders to object to the project. Either of these provisions will be considered adequate to demonstrate the consent (or objection) of all shareholders in the context of indicators G3.8, G5.3 and G5.6. Should the latter of these options be pursued, notification to each known shareholder must be documented and all shareholders must be allowed to object in writing or person within a reasonable amount of time. A reasonable amount of time is at least 30 days from the date of notification.

Proponent Response on December 9, 2009: As agreed with the validator our response to this finding was to hold a Extraordinary General Meeting (EGM)of the Shareholders of Rukinga Ranching Co Ltd. for which the agenda was one item; a resolution to approve the pursuit of the Kasigau Corridor REDD project, Phase I, and the Carbon Easement with Wildlife Works, Inc. that legalizes the pursuit of that project. We mailed out 46 letters one to each Shareholder, inviting them to attend the EGM to be held at Voi town on December 9th 2009, and we included in their letters a Proxy form by which they could vote for or against the project in absentia without having to attend the EGM. The letters of invitation provided for the statutory 21 days notice. The Validator agreed that the 21 day notice period was adequate. We have provided the Validator with copies of each letter sent out, together with the Proxy form and the Resolution description. Wildlife Works staff then spent two full days in the community trying to track down all the shareholders and were able to meet face to face with all except one, to ensure they all knew of the meeting. We have provided the Validator with the minutes of the Extraordinary General Meeting and with a shareholder count, and list of those voting in favor, which vote was unanimous. Legally, only a simple majority of Rukinga's Shareholders are required to approve this Resolution, but we understand the Validator's interest in knowing more detail behind the level of support from the local shareholders, and we believe the results of this Extraordinary General Meeting more than adequately demonstrate that the Shareholders of Rukinga Ranching Company overwhelmingly support this REDD Project, and we ask that this finding be closed.

Please note the proceedings of the Extraordinary General Meeting are confidential and should not be made part of the public record.

Validator Response: The provided proceedings clearly document the support of the project by the shareholders of Rukinga Ranching Company.

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: The public comment period was well publicized as demonstrated by the large number of submitted comments from the local community. Section G3.9 of the revised PDD describes the methods used for publicizing the comment period, including how non-electronic comments were transcribed and submitted for CCBA.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: Initially, no clear processes was formalized for handling unresolved conflicts and grievances that arise during project planning and implementation (see NCR Number 5 of 19 for October 20, 2009). However in response to an issued finding, a formal process was made and documented by the project proponent in a document titled the "Wildlife Works Community Conflict Process."

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 5 of 19 for October 20, 2009

Finding: The PDD contains a brief summary of the process for resolving disputes. However, the project proponent must formalize a plan to handle unresolved grievances that arise during the planning or implementation of the project.

Proponent Response on October 26, 2009: We have created a new document, the Wildlife Works Community Conflict Process to encapsulate the experience we have had over the years in resolving disputes amicably within the communities of the Project Zone. We have updated the content of section G3.10 of the PDD to refer to this document, and have included the text below. We believe this document together with our strong track record of excellent community relations demonstrates categorically that we have a legitimate grievance and conflict resolution process, and we ask that you close NCR#5.

Validator Response: The supplied document is a formal plan to handle unresolved grievances and it therefore adequate.

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: Detailed information regarding the financial mechanisms for project implementation were absent from the initial PDD (see NCR Number 6 of 19 for October 20, 2009). However subsequent to an initial finding, the project proponent supplied a detailed cash flow analysis that demonstrated an adequate flow of funds for project implementation. The supplied analysis included the costs and revenues of all project activities and therefore inherently shows that the anticipated climate, community and biodiversity benefits can be achieved by the adopted financial mechanisms.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 6 of 19 for October 20, 2009

Finding: The project proponent must provide a document to validate the adequacy of the flow of funds for project implementation and the financial health of the implementing organization. Include all expected revenues and estimated costs for project actives over time. The document must be of sufficient detail for evaluation by a third party.

Proponent Response on October 28, 2009: Text added to Section G3.11 - We have sent the Project Validators a detailed spreadsheet of the first two years cash flow for the project, indicating there will be

a large surplus of funds at the end of year 2, and showing the steady state finances for a full year of the project from 2011 and onwards. The revenues in the cash flow are based on an actual transaction to sell precertified carbon credits that is in the final stages and will close before end November 2009, so there is very little speculation about this cash flow.

This cash flow matches the Project Implementation Schedule to be provided to the Validator under NIR #2, and to support this cash flow document, we have also sent the Validator the following documents which will demonstrate that we have extremely detailed knowledge of what the cap ex costs are to accomplish the various project activities we are committing to in the implementation schedule;

1) Factory Addition Cell 2 Cost - EcoFactory Expansion Costing for Dye and Screen Print House

2) WW Shade House Costing – Provides cost of building additional shade house at Rukinga and also cost of each of the 5 community nurseries we will build in the Villages

3) Bungule Guard Post Costing – provides the cost of adding a new Ranger Station to monitor the SE boundary of the Project Area

4) Typical Classroom Budget – budget indicating that our $10K a year school construction maintenance budget would be adequate to build a new classroom every year if that is what the community wanted.

We have revised sections 3.11 and 4.7 to include the text above and to reference these documents sent to the validator. As we have indicated in the past this financial data is commercially sensitive and we ask that it not become a part of the public record of the our CCB PDD.

We believe that this new information provided to the Validator clearly shows that the project has the financial means to carry out the project activities, and we believe this is a more than adequate response to your finding and we ask that you consider this finding NCR#6 closed.

Validator Response: The supplied cash flow analysis demonstrates that the adopted financial mechanisms provide an adequate flow of funds.

New Information Requests: None

Opportunities for Improvement: None

3.2.4. 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:

Indicator 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.

Findings: The revised PDD identifies a single project proponent which is responsible for the project's design and implementation, Wildlife Works. Subsequent to a finding on this indicator (see NCR Number 7 of 19 for October 20, 2009), the roles and responsibilities of each individual are also presented in Section G4.1 of the PDD.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 7 of 19 for October 20, 2009

Finding: The PDD describes some of the organizations responsible for project design. Also provide a description of the individuals responsible for project implementation including their roles and responsibilities.

Proponent Response on October 29, 2009: We have revised sections G4.1 of the PDD to include the text below.

We believe that this new information provided to the Validator is a more than adequate response to your finding and meets the Standard and we ask that you consider this finding NCR#7 closed.

Validator Response: The revised sections now provide an adequate description of all individual's responsibilities for project implementation.

New Information Requests: None

Opportunities for Improvement: None

Indicator 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 support the project or have a recruitment strategy to fill the gaps.

Findings: Section G4.2 of the revised PDD documents the technical skills that will be required to successfully implement the project. Initially, the PDD lacked information about the management team's expertise and prior experience implementing land management projects at the scale of this project (see

NCR Number 8 of 19 for October 20, 2009). Subsequent to a finding on this indicator, the PDD was amended to include this information. The expertise and prior experience of the management team seems to be adequate to the successful implementation of this project given the project's size and scale.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 8 of 19 for October 20, 2009

Finding: Some of the individuals and their technical skills are provided in the PDD. However, there are several other key technical skills that are required to implement some of the project actives that are not mentioned the PDD. Also document the expertise and prior experience of the management team with respect to land management projects.

Proponent Response on October 26, 2009: We have significantly updated the content of section 4.2 of the PDD, and have included the text below. We believe this demonstrates categorically that we have assembled the skills needed to continue to have success with this project into the future, and we ask that you close NCR#8.

Validator Response: The amended PDD is now adequate with respect to this finding.

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: The revised PDD contains information and references to orientation and training for the project's employees. Initially, documented orientation and training information was absent for most of the employees of the project (see NCR Number 9 of 19 for October 20, 2009). Subsequent to a finding on this indicator, training manual were provided and references to the training manual were made in the revised PDD. It was also noted that the project management could instate a documented policy to include local community members in management positions as indicated by management during the site visit (see OFI Number 3 of 4 for October 20, 2009).

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 9 of 19 for October 20, 2009

Finding: The project proponents have included a plan for training factory workers, however no plan exists for training rangers, greenhouse staff or management positions. Please provide training plans for all project employees. Also, indicate how community member will be given a fair chance to fill positions for which they can be trained.

Proponent Response on October 24, 2009: We have located the original training programs for both Wildlife Works Rangers and the Organic Greenhouse Project and on review we believe them to still be of excellent quality, addressing all aspects of those jobs including hazards and safety precautions. We have submitted those documents electronically for your review and believe that this is a more than acceptable response to this aspect of the finding.

With regard to the other aspect of the finding, it is our policy to always give preference for any job position to members of the local community. This includes management roles. At present 100% of non management roles are currently filled with local community members.

However as stated above we were unable to find local community members with the skills and experience for the following roles; 1) Project General Manager 2) Company Accountant 3) Sewing Factory Manager. As a result we hired 1 English expatriate, Rob Dodson with extensive knowledge of the area, and with a wide range of skills needed to manage a wildlife sanctuary, sewing factory, organic greenhouse etc., and we hired 2 Kenyans from other parts of Kenya to fill the other two management roles, Paschal Mulonzya (accountant), and Daniel Munyao (Sewing Factory Manager).

We believe in loyalty to our employees and as such as long as those three individuals continue to perform their job responsibilities well, they will be retained. However, we do already have local people filling three additional management roles within the Project/Company.

1) Lenjo Laurian is our Office Manager and handles Community Relations and Personnel, and he is Taita from the immediate community and was one of our first employees and was trained into the position he now holds – We are also considering Lenjo as a valid candidate to succeed Rob Dodson as Rukinga Site Manager, and he is being groomed for that role.

2) Joseph Mwanganda – Greenhouse and Jojoba Project Manager – Joseph is a consultant to Wildlife Works, in addition to his role as Agricultural Outreach Agent for the Government. He is from the Project Zone.Joseph has a wide range of Agricultural skills and experience.

3) Eric Sagwe – Head Wildlife Ranger - Eric is a perfect example of our policy to hire locally and to promote from within. Eric grew up less than 1 mile from our Project Headquarters, and was originally hired as a young man with no formal training to be a Wildlife Ranger in the Sanctuary, when his father passed away unexpectedly. At that time the Head Ranger was a Kenyan, Ekiru Mirimuk from a different region of Kenya, who had been brought in at the start of our Project because he had specific knowledge and experience of how to set up and manage a Ranger force in the Kenyan bush, to patrol, perform anti poaching and other activities. When Ekiru retired, Eric was promoted to Head Ranger.

We appreciate the communities desire to fill management roles within the Company/ Project and are excited at their enthusiasm to do so. We will continue to prioritize local employment and in the future at such times as management roles become available we will certainly consider local candidates fist, but for the future success of the project we must always meet job skill and experience requirements as well.

We believe this adequately addresses the finding NCR #9, and that this NCR should now be closed.

Validator Response: The added plans for training rangers, greenhouse staff or management positions are adequate.

New Information Requests: None

Opportunities for Improvement:

OFI Number 3 of 4 for October 20, 2009

Finding: Based on community meetings and interviews, the project proponent should consider incorporating community members to be trained in management roles.

Proponent Response on October 24, 2009: It is our policy to always give preference for any job position to members of the local community. This includes management roles. 100% of non management roles are currently filled with local community members.

However as stated above we were unable to find local community members with the skills and experience for the following roles; 1) Project General Manager 2) Company Accountant 3) Sewing Factory Manager. As a result we hired 1 English expatriate, Rob Dodson with extensive knowledge of the area, and with a wide range of skills needed to manage a wildlife sanctuary, sewing factory, organic greenhouse etc., and we hired 2 Kenyans from other parts of Kenya to fill the other two management roles, Paschal Mulonzya (accountant), and Daniel Munyao (Sewing Factory Manager).

We believe in loyalty to our employees and as such as long as those three individuals continue to perform their job responsibilities well, they will be retained. However, we do already have local people filling two additional management roles within the Project/Company.

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2) Joseph Mwanganda – Greenhouse and Jojoba Project Manager – Joseph is a consultant to Wildlife Works, in addition to his role as Agricultural Outreach Agent for the Government. He is from the Project Zone.

Joseph has a wide range of Agricultural skills and experience.

3) Eric Sagwe – Head Wildlife Ranger - Eric is a perfect example of our policy to hire locally and to promote from within. Eric grew up less than 1 mile from our Project Headquarters, and was originally

hired as a young man with no formal training to be a Wildlife Ranger in the Sanctuary, when his father passed away unexpectedly. At that time the Head Ranger was a Kenyan, Ekiru Mirimuk from a different region of Kenya, who had been brought in at the start of our Project because he had specific knowledge and experience of how to set up and manage a Ranger force in the Kenyan bush, to patrol, perform anti poaching and other activities. When Ekiru retired, Eric was promoted to Head Ranger.

We appreciate the communities desire to fill management roles within the Company/ Project and are excited at their enthusiasm to do so. We will continue to prioritize local employment and in the future at such times as management roles become available we will certainly consider local candidates fist, but for the future success of the project we must always meet job skill and experience requirements as well.

We believe this adequately addresses the finding OFI #3, and that this OFI should now be closed.

Validator Response: NA

Indicator G.4.4. 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.

Findings: The revised PDD and interviews conducted with management during the site visit show that people from the communities will be given an equal opportunity to fill all employment positions. However, no formal and documented policy was in place to include local people for the communities into management roles as verbally indicated during the site visit (see OFI Number 3 of 4 for October 20, 2009). Further, local community members cannot be filled into positions in which they cannot be trained if no training plans are available (see NCR Number 9 of 19 for October 20, 2009). Lastly, during the site visit, the majority shareholder of Rukinga Ranching Company indicated that shares are available to the local community should they choose to invest in the company, however no formal policy was in place to clearly document how shares can be purchased and at what price (see OFI Number 1 of 1 for November 12, 2009).

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 9 of 19 for October 20, 2009

New Information Requests: None

Opportunities for Improvement: See OFI Number 3 of 4 for October 20, 2009

OFI Number 1 of 1 for November 12, 2009

Finding: The project proponent has invited the community to acquire shares in Rukinga Ranching Company. Likewise, on more than one occasion during the site visit, community members have demonstrated an interest in acquiring shares. However, no clear policy regarding the requirements for

purchase or availability of shares has been made by BenBo International (or Wildlife Works on behalf of BenBo). Consider making and publicizing a policy regarding the transfer of shares to the local community.

Proponent Response on December 9, 2009: We accept that a clear policy regarding the conditions under which BenBo International would be prepared to sell shares to the local shareholders or other members of the local community would be a good idea, although we want to be clear that this is a private company, and Ben Bo is certainly under no obligation to sell any of their shares. We made it known to the Board of Directors of Rukinga Ranching Company in a Board Meeting held immediately following the Special General Meeting on December 9th 2009 that we would approach Ben Bo about obtaining a clear statement of the terms and conditions under which Ben Bo would be prepared to sell some or all of its shares to local community members. The issues are that there would have to be a fair price set, based on the price that outside third parties have expressed a willingness to pay, and there would have to be a minimum number of shares per transaction, to justify the overhead expense of legally papering the transaction. Wildlife Works has undertaken to present the results of BenBo's analysis at the next Annual General Meeting of Shareholders in Q1 2010 or at an earlier date, at such time as a third party has made a credible offer to purchase shares from Ben Bo.

In addition we will undertake to contact the other shareholders who are not residents of the local community to see whether any of them would be willing to sell their shares to local community members and if so under what terms and conditions. Again we will undertake to present at the next AGM any opportunities that arise for local community members to purchase shares from other shareholders.

We consider this to be an appropriate and complete response to this OFI and ask that this finding be closed.

Validator Response: NA

Indicator 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.

Findings: A complete list of relevant laws and regulations covering worker's rights is provided in the revised PDD (see NCR Number 10 of 19 for October 20, 2009). The project proponent notifies employees of these laws in a statement within employee contracts. Evidence was also collected from government audits indicating that the project proponents are currently in compliance with these laws.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 10 of 19 for October 20, 2009

Finding: The project proponent has provided assurance that the project meets or exceeds local laws, evidenced by government audits. However, the project proponent must also submit a list of all relevant laws and regulations covering workers' rights.

Proponent Response on October 24, 2009: We have amended Section G4.5 of the PDD to include ALL relevant employment laws including the new Labour Relations Act of 2007, and we have explicitly described how we know we are in compliance of each of the relevant laws. We believe that submission of the updated text from the PDD below provides a complete and appropriate response to this NCR and that this NCR should now be closed.

Validator Response: The revised PDD now contains a list of all relevant laws.

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: Upon review of the original PDD and conclusion of the site visit, there was in adequate evidence to support conformance to this indicator (see NCR Number 11 of 19 for October 20, 2009). Upon response to a finding for this indicator, the supplied training manuals each provide a comprehensive assessment of situations that pose substantial risk to employees. These manuals also explain how to minimize risks to worker's safety.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 11 of 19 for October 20, 2009

Finding: Provide a comprehensive assessment of situations and occupations that pose substantial risk, including those for greenhouse workers and rangers. Document a plan to inform workers of risks and explain how to minimize risks to workers' safety.

Proponent Response on October 26, 2009: Training Manuals now provided to Validator for Sewing Factory, Greenhouse and Rangers carry complete safety sections indicating risks and providing advice and training in how to minimize risks. Soap Factory Training manual is published book on soap making called "The SoapMaker's Companion" by Susan Miller Cavitch, but we have supplemented this book with our own worker safety guide also provided to the Validators. For such a small company we are in

rural Africa we consider these manuals and risks procedures to be more than adequate, and they have allowed us to operate injury free for more than ten years. We ask that you close this NCR#11 at this time.

Validator Response: The provided training manuals adequately address this finding.

New Information Requests: None

Opportunities for Improvement: None

Indicator G4.7. Document the financial health of the implementing organization(s) to demonstrate that financial resources budgeted will be adequate to implement the project.

Findings: The financial health of the implementing organization, Wildlife Works, is well documented in the revised PDD and in a cash flow analysis (sees NCR Number 6 of 19 for October 20, 2009). The cash flow analysis demonstrates that financial resources budgeted will be adequate to implement the project.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 6 of 19 for October 20, 2009

New Information Requests: None

Opportunities for Improvement: None

3.2.5. G5 – Legal Status and Property Rights

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:

Indicator 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.

Findings: The revised PDD contains a list of all relevant national and local laws and regulations. Initially, no assurance was provided that the project will comply with these laws (see NIR Number 3 of 5 for October 20, 2009). Further, the project proponent did not document how compliance will be demonstrated. In response to an initial finding for this indicator, the project proponent provided the requested information.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests:

NIR Number 3 of 5 for October 20, 2009

Finding: A list of applicable laws has been provided and compliance has been assured, however no demonstration of compliance has been presented. The project proponent must explicitly demonstrate how compliance is achieved where relevant.

Proponent Response on October 24, 2009: We have amended Section G5.1 of the PDD to include ALL relevant employment laws including the new Labour Relations Act of 2007, and we have explicitly described how we know we are in compliance of each of the relevant laws. We believe that submission of the updated PDD text below provides a complete and appropriate response to this NIR and that this NIR should now be closed.

Validator Response: The amended PDD is adequate as it completely describes how the project will comply with relevant national and local laws.

Opportunities for Improvement: None

Indicator 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.

Findings: A signed conservation easement documents that the project has approval from the local authorities, including Rukinga Ranching Company. Interviews with the local authorities during the site visit did not indicate any other approval is needed. Although the conservation easement clearly shows that Rukinga Ranching Company has conveyed the climate and biological rights of the project area to Wildlife Works, the project proponent, it was unclear whether all shareholders of Rukinga Ranching Company gave their approval for the conservation easement. Based on guidance from CCBA, Wildlife Works was required to confirm that infact all shareholders support the project (see NCR Number 1 of 1 for November 12, 2009).

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 1 of 1 for November 12, 2009

New Information Requests:

NIR Number 4 of 5 for October 20, 2009

Finding: The project proponent must provide a list of all shareholder owners whose rights the project will affect. Please provide a copy of the signed conservation easement to document the free, prior, informed and full consent of these shareholders for the project.

Proponent Response on October 24, 2009: We have greatly expanded in the PDD in section G5.3 the time line of events leading to the unanimous approval by those Shareholders present at the February 13th 2009 AGM of Rukinga Ranching Company Ltd. to allow the Managing Director to pursue the REDD project opportunity on Rukinga. We have included this text below, to avoid resending the entire PDD for each finding response.

We have also provide you with a full list of all Shareholders currently known to the company (it is possible that some of those Shareholders are deceased, and that family members are in the process of acquiring Court papers granting them inheritance of the shares, but we will not be aware of this until that process is complete and they present their proof of inheritance to the Company Secretary).

We have emailed you a copy of the presentation made to the Shareholders of Rukinga Ranching Co. Ltd during the AGM of February 13th 2009 at which AGM they approved the pursuit of the Project, leading to the signing of the Carbon Easement on February 15th 2009.

Finally we have provided you with a copy of the Carbon Easement signed between Rukinga Ranching Company Ltd. and Wildlife Works, Inc. This Carbon Easement is also commercially sensitive, as it was developed by Wildlife Works at significant expense, and we would ask the auditors and CCB NOT to post this to the website.

We believe that as Rukinga is 100% of the land covered under the Project Area, and that it is Privately owned by the Rukinga Ranching Company Ltd. that the information and documents provided above are a complete response to the finding and therefore finding NIR #4 should be closed.

Validator Response: The provided easement is adequate to satisfy this finding, however it is unclear whether all shareholders of Rukinga Ranching Company support this easement (see NCR Number 1 of 1 for November 12, 2009).

Opportunities for Improvement: None

Indicator 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.

Findings: The rights to the climate and biodiversity of the project area are owned by Wildlife Works and were conveyed in a conservation easement from Rukinga Ranching Company. Although a legal majority of shareholders affected this conveyance, it was initially unclear whether all shareholders supported the transfer of their climate and biodiversity rights in the project area to Wildlife Works (see NCR Number 1 of 1 for November 12, 2009). In response to a finding made by the validator, a special AGM was held to confirm the complete support of all Rukinga shareholders.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 1 of 1 for November 12, 2009

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: The project does not require the involuntary relocation of people as no people live in the project area as of the start date of the project.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator 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 help to reduce these activities so that project benefits are not derived from illegal activities.

Findings: The two major illegal activities that could affect the project's benefits are harvesting of firewood and poaching. Both of these activities and descriptions of how these activities will be reduced in the project zone as a result of this project are identified in Section G5.5 of the PDD.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator 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 validation against the Standards, the project proponents must provide evidence that their ownership of carbon rights is likely to be established before they enter into any transactions concerning the project's carbon assets.

Findings: The rights to the climate benefits of the project area are owned by Wildlife Works and were conveyed in a conservation easement from Rukinga Ranching Company. Although a legal majority of shareholders affected this conveyance, it was initially unclear whether all shareholders supported the transfer of their climate and biodiversity rights in the project area to Wildlife Works (see NCR Number 1 of 1 for November 12, 2009). In response to a finding made by the validator, a special AGM was held to confirm the complete support of all Rukinga shareholders. The evidence collected in response to this finding clearly demonstrates that the project proponents have clear, legal and uncontested title to the carbon rights.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 1 of 1 for November 12, 2009

New Information Requests: See NIR Number 4 of 5 for October 20, 2009

Opportunities for Improvement: None

3.3. Climate Section

3.3.1. 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:

Indicator 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.

Findings: The estimated net change in carbon stocks due to the project activities were estimated in part using an IPCC Tier 3 methodology and an analysis of local deforestation. These procedures are documented in Sections G1.4, G2.3 and CL1.1.

For current carbon stocks assumed to remain constant or increase over the lifetime of the project due to project activities, diameter measurements, stem counts and allometric equations are used to estimate the aboveground biomass. Belowground biomass is estimated using ratios of above-to-belowground relative biomass from the IPCC guidance document. The allometric equations for above ground biomass were parameterized using a purposive sample within common species groups. The sample appeared to be representative of the entire project area. The allometric equations for aboveground biomass were not cross-validated for over fitting or selected using any statistical criteria. Given the limited number of allometric equations available in the literature for this region of the continent, the constructed equations seem adequate.

Soil organic carbon was estimated using a simple random sample of soil cores analyzed by a third party. This method for estimating soil carbon appears to be adequate. The project proponent assumes that the soil organic pool will remain constant throughout the life of the project, which is a reasonable assumption.

Under the 'without project' reference scenario, the rate is assumed to linear in population size and population growth is assumed to be linear in time. The latter of these assumptions is probably false (see OFI Number 1 of 4 for October 20, 2009), however the overall estimated deforestation rate is probably conservative based on evidence from the site visit.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: See OFI Number 1 of 4 for October 20, 2009

Indicator 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.

Findings: The non-CO2 GHG emissions in the *with* and *without* project scenarios are not likely to account for more than a 5% increase or decrease of the project's overall GHG emissions reductions or removals over each monitoring period (see NCR Number 12 of 19 for October 20, 2009).

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 12 of 19 for October 20, 2009

Finding: Based on anecdotal evidence obtained during the site visit, the GHG emissions of non-CO2 gases is likely less than 5% of the project's overall emissions reductions (within the project area and zone). Also based on anecdotal evidence, the net climate impact of the project is likely positive. However, the project proponent must estimate the net change in these non-CO2 emissions, including those emissions resulting from project activities. Also, demonstrate the net climate impact is positive considering the estimated reductions, GHG emissions and unmitigated leakage (GL2.3).

Proponent Response on November 1, 2009: We have added a full carbon footprint analysis for all Project Activities both within the Project Area and the Project Zone to Section CL1.3 of the PDD text of which is below, which encompasses our more detailed response to CL2.4, and demonstrates categorically that our project has an overwhelmingly positive emissions reduction impact. We have updated the leakage, and leakage mitigation descriptions in Sections CL2.1, CL2.2, CL2.3 covered under NCR#13, to support our argument for no unmitigated leakage, and we consider this to be a full and complete response to this finding and ask that you close NCR#12.

Validator Response: The proponent's response is adequate and shows the non-CO2 GHG emissions in are not likely to account for more than a 5% increase or decrease of the project's overall GHG emissions reductions or removals over each monitoring period. The addition of unmitigated leakage shows that there is in fact an overwhelming positive climate impact to the project.

New Information Requests: None

Opportunities for Improvement: None

Indicator 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 emissions from the decomposition of N-fixing species.

Findings: Other GHG emissions resulting from project activities are estimated in Section CL1.2 of the revised PDD (see NCR Number 12 of 19 for October 20, 2009). The types of sources of emissions listed in the PDD and the estimated emissions for these sources seem complete and accurate.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 12 of 19 for October 20, 2009

New Information Requests: None

Opportunities for Improvement: None

Indicator 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).

Findings: Based on the evidence provided in the revised PDD and responses to findings (see NCR Numbers 12 and 13 of 19 for October 20, 2009), the project has a net positive climate impact.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 12 of 19 for October 20, 2009
See NCR Number 13 of 19 for October 20, 2009

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: GHG emissions reductions and removals cannot be double counted because Kenya does not have an emissions cap.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

3.3.2. 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:

Indicator 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.

Findings: Two types of leakage are identified in the PDD: activity shifting and market effects leakage. There are no other apparent types of leakage for the project. Originally, the PDD did not define and justify where leakage is most likely to take place (see NCR Number 13 of 19 for October 20, 2009). In response to an initial finding, the PDD was revised to include the location of activity shifting leakage (other unprotected ranches in the project zone) and market effects leakage (the commerce of fuel wood in the local communities).

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 13 of 19 for October 20, 2009

Finding: The PDD contains a description of the communities around the project area and not types of leakage or where leakage is likely to take place. During the site visit, the project proponent determined there are no expected types of leakage in the project zone. The project proponent must provide a detailed description of how they determined there are no expected types of leakage in the project zone due to project activities, primarily the exclusion of people from the project area to make charcoal and practice agriculture. Provide this description in sufficient detail and refer to specific areas where leakage may or may not take place within the project zone.

Proponent Response on November 1, 2009: We have added significantly to the PDD content of Sections CL2.1, CL2.2, CL2.3 and CL1.4 and the text is included below. We have updated the leakage, and leakage mitigation descriptions in Sections CL2.1, CL2.2, CL2.3 covered under NCR#13, to support our argument for no unmitigated leakage, and we consider this to be a full and complete response to this finding and ask that you close NCR#13.

Validator Response: Based on evidence collected during the site visit, there is potential for market effects in the commerce of charcoal originating from the project area. Although charcoal production from private land is illegal, it is none-the-less a form of leakage and should be estimated when determining the overall net climate benefit of the project.

New Information Requests: None

Opportunities for Improvement: None

Indicator CL2.2. Document how any leakage will be mitigated and estimate the extent to which such impacts will be reduced by these mitigation activities.

Findings: With respect to the activity shifting leakage, the project aims to protect other ranches in the project zone from agricultural conversion. This activity will effectively mitigate activity shifting leakage. With respect to market effects leakage, the project proponent claims that as a result of the project there will be no commerce in firewood as historically firewood from within the project area was consumed for household use. This is contradictory to the evidence collected during the site visit. The sale of charcoal was observed outside the project area indicating commerce in firewood (via charcoal production). The

revised PDD does not contain any mitigation strategies for the market effects of charcoal sales (see NCR Number 13 of 19 for October 20, 2009). However to some degree, the same argument as activity shifting leakage can be applied to the leakage due to market effects. Since charcoal production is generally a local activity, the protection of adjacent ranches in the project zone will suffice to mitigate the market effects of firewood sales.

Despite the anticipated protection of adjacent ranches in the project zone, it is unreasonable to think that no charcoal production will occur on these ranches as a result of project activities. Based on the evidence observed during the site visit, charcoal production on adjacent ranches has likely already occurred since the project start date of January 2006. As of 2009, the adjacent ranches have not been protected as an activity under this project. Therefore, leakage as a result of charcoal production should have been estimated. However, since the amount of leakage due to fuelwood production on adjacent ranches is expected to be relatively minor until the initiation of project activities to protect adjacent ranches, non-conformance to this indicator is immaterial as this leakage will not affect the positive climate benefits of this project.

Conformance: Yes ☐ No ☒ N/A ☐

Non-Conformity Reports: See NCR Number 13 of 19 for October 20, 2009

New Information Requests: None

Opportunities for Improvement: None

Indicator CL2.3. Subtract any likely project-related unmitigated negative offsite climate impacts from the climate benefits being claimed by the project and demonstrate that this has been included in the evaluation of net climate impact of the project (as calculated in **CL1.4**).

Findings: Given the estimated positive benefits of the project and the anticipated but unestimated leakage due to minor fuelwood consumption (see NCR Number 13 of 19 for October 20, 2009), the net climate impact of the project is positive.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 13 of 19 for October 20, 2009

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: Non-CO2 gases have been demonstrated to account for less than 5% of the net change in the project's overall off-site GHG emissions reduction or removals (see NCR Number 12 of 19 for October 20, 2009).

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 12 of 19 for October 20, 2009

New Information Requests: None

Opportunities for Improvement: None

3.3.3. 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:

Indicator CL3.1. Develop an initial plan for selecting carbon pools and non-CO2 GHGs to be monitored, and determine the frequency of monitoring. Potential 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.

Findings: An initial monitoring plan has been established in Section CL3.1 of the revised PDD. Originally, the PDD lacked information about the frequency of monitoring (see NCR Number 14 of 19 for October 20, 2009), however was later amended to include this information.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 14 of 19 for October 20, 2009
Finding: The project proponent must specify the frequency of monitoring. **Proponent Response on October 30, 2009:** We have revised sections CL3.1 of the PDD to include the text below, to provide specific frequencies of monitoring. We believe that this new information provided to the Validator is a more than adequate response to your finding and meets the Standard and we ask that you consider this finding NCR#14 closed. **Validator Response:** The revised PD is adequate.

New Information Requests: None

Opportunities for Improvement: None

Indicator CL3.2. Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to 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.

Findings: The project proponent has committed to developing a full monitoring plan within twelve months of the validation.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

3.4. Community Section

3.4.1. 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:

Indicator 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.

Findings: Wildlife Works carbon offset project's PDD has details of the net positive impact that the project will have on the local community. A thorough scrutiny and interviews with the local community supports such sentiments presented in the PDD even in its current operational status and organisation. Wildlife Works, the community confirmed, gives back quite substantially.

Wildlife Works currently offers employment to the local community at their Export Processing Zone's (EPZ) organic sewing factory. It also offers other employments opportunities to the locals as house helps, night guards, game rangers, drivers, office management staff and mechanics-a form of sharing with the community the net benefits. All employment opportunities are indiscriminate of gender and always fair considerations and merits are the guiding principal in recruitments.

All these employment opportunities empower the local community members concerned with appropriate skills that can as well be applied elsewhere, monthly cash flows which give them some comparative advantages over other communities in the project zone and purchasing powers leading to improved living standards.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator CM1.2. Demonstrate that no High Conservation Values identified in **G1.8.4-6**42 will be negatively affected by the project.

Findings: The project area links two very important conservation areas-the Tsavo East and West National Parks. It is therefore a migratory corridor whose presence helps the wildlife from both parks to

move freely in search of pasture, water and protection. The "without project scenario" will result in exposure of endemic and endangered wildlife to poaching while they migrate on the corridor because the "without project scenario" will lead in vegetation destruction and land degradation.

The controlled fuel wood collection by the local community, the restricted over grazing of cattle also by the local community, the strict surveillance and patrols to avert poaching of wildlife and trees, instituted by the project through recruiting enough game rangers; will be positive in promoting High Conservation Values identified in G 1.8..4-642 and will not have negative effect on the said HCV in the area.

The foregoing finding of the audit team concurs with the explanations given by the project proponent stated in the PDD.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 2 of 19 for October 20, 2009

NCR Number 18 of 19 for October 20, 2009

Finding: There are clear risks to the project's climate, community and biodiversity benefits (including impacts on the well-beings of communities and the conservation of biodiversity), including the risks posed by prolonged drought as a result of climate change. The project proponent must identify these risks and explain how they will be mitigated.

Proponent Response on October 26, 2009: We have significantly amended Sections GL1.2 and GL1.3 of the PDD to include a lot more detail no Climate Change factors relevant to our Project. We believe that submission of the updated PDD text below provides a complete and appropriate response to this NCR and that this NCR should now be closed.

Validator Response: The response is adequate.

New Information Requests: None

Opportunities for Improvement: None

3.4.2. CM2 – 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:

Indicator CM2.1. Identify any potential negative offsite stakeholder impacts that the project activities are likely to cause.

Findings: The initial PDD claimed that there were no net negative offsite stakeholder impacts. During the audit process, negative impacts were discovered. The project proponent responded to the NCR by updating the PDD to include language explaining why this is the case. The auditors took the information into consideration and found the proponent to be in conformance.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 15 of 19 for October 20, 2009

Finding: The project proponent strongly claims there are no negative offsite impacts to stakeholders. However, based on community meetings, interviews and observations conducted during the site visit, potential negative offsite impacts indeed exist. Community members identified the following potential negative offsite impacts: an exclusive dependence on Wildlife Works for livelihood, an increase in wildlife-human conflicts and the exclusion of grazing from the sanctuary. The project proponent must address these negative impacts to stakeholders and describe how they will be mitigated. Also, demonstrate that project is not likely to result in net negative impacts on the well being of other stakeholder groups. Note that the Duruma are considered another stakeholder group as defined by the CCBA.

Proponent Response on October 30, 2009: We have addressed the community perception that there are potential negative impacts from the Project Activities by adding content to sections CM2.1, CM2.2 and CM2.3. We have included that text below and we believe that this provides an adequate and complete response to your finding and as such we ask that you close finding NCR#15.

Validator Response: The response is adequate.

New Information Requests: None

Opportunities for Improvement: None

Indicator CM2.2. Describe how the project plans to mitigate these negative offsite social and economic impacts.

Findings: Geographically, Taita district, the location of the project is categorised as a semi arid area and marginalized. The major economic activity is dry land rain fed agriculture and pastoralism. With emergence of persistent drought in Kenya, agriculture and pastoralism has been highly affected leading to high failures and loss of otherwise dependable livelihood by the community in the area.

Wildlife Works has been supporting research work in collaboration with the Kenya Agricultural Research Institute (KARI) to introduce and upscale some viable alternative cash crops in the area. Jojoba (Simmondsia chinensis), was introduced in Rukinga ranch before Wildlife Works purchased and took over the management of the ranch. This crop has persisted the scarcity of rainfall and high temperature variability in the area and has proved itself to be a viable and dependable cash crop in the area. With its highly demanded and highly priced oil, Wildlife Works hopes to market the crop and supply its seeds and seedlings to local community for commercial propagation. Already Wildlife Works has established a nursery for raising its seedlings. It is hoped that if the community accept this crop and plant it in large scale, the area could turn to be a net exporter of Jojoba seeds and oil which has a global demand. The success of this crop establishment and adoption of the crop by the local community will be a viable and a more sustainable way of empowering the local community economically.

Wildlife Works has also established a Citrus fruit tree nursery in their organic green house and through adaptive research identified species that do well in different soils and ecological zones in the area. The citrus species are sold to the local farmers for planting in their farms at subsidized prices. Through this initiative; some farmers in the area have gone full scale in commercial citrus fruit farming and are economically benefiting.

These efforts by Wildlife Works are viable initiatives and were considered by the audit team to mitigate negative impacts on offsite stakeholders and will eventually empower local people to diversify into other sustainable income generation activities in the project area and project zone.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 15 of 19 for October 20, 2009

New Information Requests: None

Opportunities for Improvement: None

Indicator CM2.3. Demonstrate that the project is not likely to result in net negative impacts on the well-being of other stakeholder groups.

Findings:

In the community public meeting, it emerged that there will be negative impacts emanating from human-wildlife conflicts, exclusion of some people still practicing traditional rituals in sites located in the project area, fuel wood collection etc. In the subsequent follow up meeting with the project proponent, he argued that since taking over the management of the ranch, the communities who lived inside the project area were moved out and with the concerted patrol of the ranch by rangers, direct conflict and interaction between wildlife and community has been greatly minimized.

Cases of stray wildlife into the community residence, raiding their crops or attacking their cattle have always been timely reported to the Kenya Wildlife Services (KWS) who are legally mandated to manage wildlife in Kenya and who share VHF radio frequencies with Wildlife Works. In such cases KWS have driven the wildlife back to the protected area.

Being a wildlife corridor the project area play a vital role in ensuring that the migrating wildlife have most of what they need and hardly attack the community. The protection of the wildlife too will ensure the existence of the wildlife to perpetuity and so are the tourism industries which brings a lot of foreign exchange for national development. Thus the net impacts are positive.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

3.4.3. 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:

Indicator 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 project's community development objectives and to anticipated impacts (positive and negative).

Findings: The initial PDD did not include monitoring variables that addressed all of the community development objectives. NCR 16 was issued. The project proponent subsequently revised the PDD to include this information.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 16 of 19 for October 20, 2009

Finding: The selected monitoring variables do not address all of the community development objectives. The monitoring variables must be directly linked to the community development objectives.

Proponent Response on November 1, 2009: We have significantly enhanced Section CM3.1 to add an extensive list of monitoring variables organized by specific Project Activity. The text of that section is included below. We believe this represents a complete and acceptable response to your finding and meets the standard and we ask that you close finding NCR#16.

Validator Response: The information provided is adequate.

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: The project proponent has not outlined in the revised PDD, the means that will be used in assessing the effectiveness of measures used to maintain or enhance High Conservation Values related to community well-being present in the project zone. However the proponent has described how the project will use the game rangers on daily basis to monitor some of the endangered endemic wildlife species in the ranch. They hope to use the carbon finance to upscale the wildlife monitoring intensity and the range of monitoring.

In addition the Global Positioning System (GPS) coordinates of the areas where the monitored species of wildlife are mostly sighted will help the management in designing an effective surveillance and monitoring programme since such areas are more vulnerable to poaching or disease out break.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 2 of 19 for October 20, 2009

New Information Requests: None

Opportunities for Improvement: None

Indicator CM3.3. Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.

Findings: The project proponent has committed in the revised PDD to develop a detailed monitoring plan within twelve months of validation. He has also promise to make such a plan available to the stakeholders via the internet as required by the CCB Standards.

During the field site visit, the project proponent assured the audit team that the project will establish a detailed monitoring plan for the project.

Conformance:	Yes	☒	No	☐	N/A	☐
Non-Conformity Reports:	None					
New Information Requests:	None					
Opportunities for Improvement:	None					

3.5. Biodiversity Section

3.5.1. 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:

Indicator 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.

Findings: Wildlife Works has addressed very well the changes on biodiversity in the revised PDD. It is true that the management of Wildlife Works has been keen on estimating the biodiversity changes using their rangers that go on daily patrols of the ranch.

The project proponent provided documentary evidence of the methodologies used in biodiversity changes in the ranch and these were availed to the audit team during the field site visit. During the field site visit also the audit team also observed the biodiversity data collection technique and analysis.

The preservation of the ecosystems and habitat was also observed during the field site visit where rangers were seen keeping off the ranch those illegally grazing in the ranch and promoting over grazing and land degradation in particular areas of the ranch. The intensity of patrol and surveillance has kept those poaching for bush meat for sale and trophies off not to operate in the ranch. By working together with the Kenya Wildlife Services (KWS), Wildlife Works has asked for reinforcement whenever necessary.

The permanent vegetation plots also help the ranch management in tracking vegetation transition with time in a situation of free grazing by wildlife. However there are other components of biodiversity which too are indicators of the biodiversity health and may need to be monitored as well because they too are important in nutrient recycling. They include arthropods, birds, reptiles, amphibians, small mammals besides large mammals like elephants, zebra, buffaloes, giraffe etc.

The 'with project' scenario will ensure sustainable conservation of biodiversity in the ranch as has been rightly described by the project proponent in the PDD. The 'without project' scenario will lead to quick destruction and disappearance of the endemic and already endangered species of biodiversity in the ranch because even at its protection and intense patrols and surveillance by the Wildlife Works rangers, there is pressure from those living around the ranch and generally in the project zone.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator B1.2. Demonstrate that no High Conservation Values identified in G1.8.1-348 will be negatively affected by the project.

Findings: The project proponent stated in the revised PDD that there will not be any negative impact on the High Conservation Values, contending that it is their day to day duty to conserve such areas.

The results of the audit confirm that HCVs will not be negatively affected by the project.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: The project proponent has explained in the revised PDD that there are no new species that are being introduced in the project area and hence the action of the project will not lead to introduction of the invasive species in the project area.

During the site visit, the audit team evaluated the species being raised in the project's Green House and only noted that the composition of the species are agroforestry species and some exotic species which have been researched on and found to be suitable for dryland afforestation activities and have no ability for invasiveness and so are not a threat to the biodiversity conservation in the area.

The audit team also confirmed that Wildlife Works is following up the suitability of Jojoba (Simmondsia chinensis) as a cash crop and confirmed that although this was introduced in the project area many years ago before Wildlife Works took over the management of the ranch. However this species too has not spread beyond the areas where it was introduced, showing that it is not invasive and so has no threat to the biodiversity of the project area.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports:

NCR Number 17 of 19 for October 20, 2009

Finding: The project proponent must identify all species to be used by the project including those provided by the greenhouse project activity and other project activities. If some of the species are non-native , describe the possible adverse effects. Also, justify why non-native species are used over native species.

Proponent Response on October 29, 2009: We have revised sections B1.3 and B1.4 of the PDD to include the text below.

We believe that this new information provided to the Validator is a more than adequate response to your finding and we ask that you consider this finding NCR#17 closed.

Validator Response: The response is adequate.

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: The project prominent in the revised PDD explained that this indicator does not apply. And during the site visit, the audit team too confirmed that the fast growing exotic species raised in the project's Green House nursery are not planted in the project area but are rather given out to the local community for planting in their private farms as a way of empowering the community to produce their own forest products for their use.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 17 of 19 for October 20, 2009

New Information Requests: None

Opportunities for Improvement: None

Indicator B1.5. Guarantee that no GMOs will be used to generate GHG emissions reductions or removals.

Findings: The project proponent has explained in the PDD that no GMOs will be used to generate GHG emissions reductions or their removal.

This was confirmed by the audit team who confirmed that the species raised in the Green House tree nursery are not planted in the Wildlife Works project and the Green House tree nursery does not raise GMOs.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

3.5.2. 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:

Indicator B2.1. Identify potential negative offsite biodiversity impacts that the project is likely to cause.

Findings: In the revised PDD, the project proponent has described that as a result of the project; there will be no offsite negative impact on biodiversity.

Following the field site visit, the audit team established that as a result of the project, there will not be any potential negative offsite biodiversity impacts that the project is likely to cause, but rather it will have offsite positive biodiversity impact due to its activities.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator B2.2. Document how the project plans to mitigate these negative offsite biodiversity impacts.

Findings: Based on the response in B2.1 above, this indicator does not apply. The project proponent has also responded the same in the revised PDD.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: The project proponent in the PDD does not anticipate any negative offsite biodiversity impacts from the project. But the net effect of the project on biodiversity in the Wildlife Works projects and offsite is expected to be positive.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

3.5.3. 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:

Indicator 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).

Findings: The project proponent has highlighted a monitoring schedule that will be used in Wildlife Works REDD project and also listed a number of variables in the PDD that will be monitored with a frequency being on a daily basis.

The project proponent however should consider recording the locations of animal and poacher sightings using a GPS.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement:

OFI Number 4 of 4 for October 20, 2009
Finding: The project proponent may consider recording the locations of animal and poacher sightings using a GPS. Also, the project proponent may consider observing characteristics of the population structure of wildlife species. **Proponent Response on October 24, 2009:** This is an excellent suggestion and we have now adapted our Daily Ranger Patrol Sheet to include GPS location and population characteristics, and as this is the

primary instrument for daily monitoring of the health of the Biodiversity in the Project Area, and is filled in every day by the three teams of Rangers in the bush, we believe this will provide us more granular data on Biodiversity in the Project Area. We believe this fully address this OFI and this should now be considered closed.

Validator Response: NA

Indicator 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.

Findings: The project proponent stated in the revised PDD how Wildlife Works has used the rangers to assess species richness in Rukinga ecosystem, avert illegal activities such as grazing of cattle, poaching and incidence of fire.

The intention to expand monitoring schedule to enhance High Conservation Values related to globally, regionally or nationally significant biodiversity (G1.8.1-3) present in the project zone is ideal too and will strengthen the species monitoring plan.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 2 of 19 for October 20, 2009

New Information Requests: None

Opportunities for Improvement: None

Indicator B3.3. Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.

Findings: At the time of the site visit, the project proponent had not fully developed a full monitoring plan. However in the revised PDD, the project proponent has committed to develop full monitoring plan within twelve months of validation against the Standards

He also committed to disseminate the 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

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

3.6. Gold Level Section

3.6.1. 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:

Indicator GL1.1. Identify likely regional climate change and climate variability scenarios and impacts, using available studies, and identify potential changes in the local land-use scenario due to these climate change scenarios in the absence of the project.

Findings: The likely regional climate change and variability scenarios and impacts are identified in Section GL1.1 of the revised PDD. These scenarios were supplemented with available studies (see NIR Number 5 of 5 for October 20, 2009). The identified potential changes in the local land-use as described in the PDD seem accurate based on the references provided.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests:

NIR Number 5 of 5 for October 20, 2009

Finding: Provide references to available studies used to identify likely regional climate change and climate variability scenarios.

Proponent Response on October 24, 2009: We have added a list of published references to the impact on Climate Change in Kenya, East Africa and Sub-Saharan Africa to the PDD in section GL1.1. We have included that text below. We believe this adequately addresses this finding and ask that the finding NIR #5 be closed.

Validator Response: The response is adequate.

Opportunities for Improvement: None

Indicator 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.

Findings: Given the likely climate change impacts described in Section GL1.1 of the revised PDD, the project proponent has identified several risks to the project's benefits: scarcity in food would affect the demand for bush meat poached from the project area, degradation of the natural food sources for wild animals, increased pressure for cattle grazing within the project area and scarcity of water in general. These identified risks are reasonable given the likely climate change impacts for local land-use.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: In Section GL1.2, the project proponent has demonstrated that current or anticipated climate changes are likely to have an impact on the well-being of communities and the conservation status of biodiversity in the project zone. This section was supplemented for Indicator GL1.3 based on a finding during the course of the audit (see Number 18 of 19 for October 20, 2009). These anticipated climate impacts are also likely to have an impact on surrounding regions.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: See NCR Number 18 of 19 for October 20, 2009

New Information Requests: None

Opportunities for Improvement: None

Indicator GL1.4. Demonstrate that the project activities will assist communities *and/or* biodiversity to adapt to the probable impacts of climate change.

Findings: As described in the revised PDD and observed during the site visit, the project proponent demonstrates that the project activities will assist communities and biodiversity to adapt to the probable impact of climate change. The project proponent will: create livelihoods alternative to agriculture, improve efficiency of agriculture production and protection of the project area from poachers.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

3.6.2. 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:

Indicator 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.

Findings: The project proponent has elected not to pursue these optional Gold Level criteria.

Conformance: Yes ☐ No ☐ N/A ☒

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: The project proponent has elected not to pursue these optional Gold Level criteria.

Conformance: Yes ☐ No ☐ N/A ☒

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: The project proponent has elected not to pursue these optional Gold Level criteria.

Conformance: Yes ☐ No ☐ N/A ☒

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: The project proponent has elected not to pursue these optional Gold Level criteria.

Conformance: Yes ☐ No ☐ N/A ☒

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Indicator 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.

Findings: The project proponent has elected not to pursue these optional Gold Level criteria.

Conformance: Yes ☐ No ☐ N/A ☒

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

3.6.3. 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:

Indicator GL3.1. Vulnerability
Regular occurrence of a globally threatened species (according to the IUCN Red List) at the site:
1.1. Critically Endangered (CR) and Endangered (EN) species - presence of at least a single individual; or
1.2. Vulnerable species (VU) - presence of at least 30 individuals or 10 pairs.

Findings: The project area is inhabited by African elephant (Loxodonta africana) and Grevy's Zebras (Equus grevyi), both are globally threatened species according to the IUCN Red List.

The presence of black rhino in both East and West National parks, a critically endangered wildlife species makes the project area a very important corridor of wildlife.

Other threatened species, Critically Endangered (CE) and vulnerable species (VU) may be nocturnal, birds, reptiles, amphibians or even species of insects etc. These require proper research to establish a more impressive check list of all the species of the ranch.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

Or,

Indicator GL3.1. Irreplaceability
A minimum proportion of a species' global population present at the site at any stage of the species' lifecycle according to the following thresholds:
2.1. Restricted-range species - species with a global range less than 50,000 km2 *and* 5% of global population at the site; or
2.2. Species with large but clumped distributions - 5% of the global population at the site; or
2.3. Globally significant congregations - 1% of the global population seasonally at the site; or
2.4. Globally significant source populations - 1% of the global population at the site.

Findings: The information provided by the project proponent regarding Grevy's Zebra conforms to 2.4 above. 3% of the global population of the species is found at the project site making it a globally significant source population.

Conformance: Yes ☒ No ☐ N/A ☐

Non-Conformity Reports: None

New Information Requests: None

Opportunities for Improvement: None

4.0 CCB Validation Conclusion

Following completion of SCS's duly-accredited validation process, it is our opinion that *The Kasigau Corridor REDD Project* conforms to the CCBA Climate, Community and Biodiversity Project Design Standards (Second Edition) at the Gold Level (see Appendix A).

General Section

		Conformance			
G1.	Original Conditions in the Project Area (Required)	Yes	☒	No	☐
G2.	Baseline Projections (Required)	Yes	☒	No	☐
G3.	Project Design and Goals (Required)	Yes	☒	No	☐
G4.	Management Capacity and Best Practices (Required)	Yes	☒	No	☐
G5.	Legal Status and Property Rights (Required)	Yes	☒	No	☐

Climate Section

CL1.	Net Positive Climate Impacts (Required)	Yes	☒	No	☐
CL2.	Offsite Climate Impacts ("Leakage") (Required)	Yes	☒	No	☐
CL3.	Climate Impact Monitoring (Required)	Yes	☒	No	☐

Community Section

CM1.	Net Positive Community Impacts (Required)	Yes	☒	No	☐
CM2.	Offsite Community Impacts (Required)	Yes	☒	No	☐
CM3.	Community Impact Monitoring (Required)	Yes	☒	No	☐

Biodiversity Section

B1.	Net Positive Biodiversity Impacts (Required)	Yes	☒	No	☐
B2.	Offsite Biodiversity Impacts (Required)	Yes	☒	No	☐
B3.	Biodiversity Impact Monitoring (Required)	Yes	☒	No	☐

Gold Section

GL1.	Climate Change Adaptation Benefits (Optional)	Yes	☒	No	☐
GL2.	Exceptional Community Benefits (Optional)	Yes	☐	No	☒
GL3.	Exceptional Biodiversity Benefits (Optional)	Yes	☒	No	☐

CCBA Validation Level Attained:

APPROVED (all requirements met)	☐
GOLD (all requirements and also at least one optional Gold Level criterion met	☒

I would like to comment on the proposed Project Design Document for Rukinga Sanctuary carbon project, the Kasigau corridor Reduced Emissions from Deforestation and Degradation (REDD) project. Since the arrival of Wildlife Works in the year 1998, the community has benefited a lot. As I am part of the community, I have personally benefited through secondary education sponsorship programme, which Wildlife Works had introduced in 2002. Without Wildlife Works, education could have been only a dream to me.

Wildlife Works projects have brought lots of benefits to most of the community members. Some of the benefits include; Employment in the EPZ factory, wildlife rangers and the green house tree planting. All these have so far improved the community's living standard by increasing their monthly incomes. Another benefit is the improvement of learning institutions such as primary and secondary schools. In the 1990s, children used to go learn in grass-thatched classrooms. These rooms forced the children to go home once there were indications that the rains were coming because they were leaking. With Wildlife Works, children are staying in classes without fear. Those students who work hard and perform well are sponsored by well-wishers through Wildlife Works.

Therefore, the proposed REDD project will highly benefit more community members. Most people near the project zone are poor and some of them depend on agriculture and cutting down of trees for charcoal. These lead to deforestation and hence pose problems. If the REDD project starts, there will automatically be more employment opportunities for many locals. All those people who were initially involved in environmental degradation activities will then be involved in constructive activities and hence maintenance of trees in the area. This project will also make the community to be more exposed because most tourists will come to the sanctuary and visit the community and schools too. Most of the community members are not used to western people therefore frequent visits by the tourists will expose these people more and more. More sponsorship for children is also expected due to increased number of sponsors from abroad.

James Ruwa
GAFFER HIV/AIDS PROJECT COORDINATOR.
September 24, 2009

I am really encouraging the introduction of Kasigau corridor REDD project, for sure a lot will be done.

I knew wildlife works ten years ago, when they were handing over the classrooms they helped to build in Buguta, Kale and Marungu where the ceremony was held.

I used to work with forestry department by that time and wildlife works invited me to help the guest of honour with the planting of the ceremonial trees. From that time I got very much involved with them especially with the training of the communities how to establish tree nurseries.
To help the communities living around Mt. Kasigau to conserve the mountain, wildlife works conducted vegetation survey to find how much damage is done and involved the locals by identifying the plants in each plot.

Wildlife works helped sponsoring bright children so that they could get good education; get good job and stop poaching and making charcoal.

To continue protecting Kasigau corridor, wildlife works helped with the training of community scouts who patrols around the village to educate the communities the importance of wildlife and to remove the snares put around the community's farms. If it wasn't wildlife works, Rukinga ranch could have been encroached by the people living adjacent to it and could also make the movement of elephants from Tsavo east to west impossible, as this is their migratory corridor.

Long Live Wildlife Works
Keep on working with communities.

Kenneth Nyange
Project Manager – Camp Tsavo
October 9, 2009

I' personal feel that the proposed project has really benefited the community around this place. There is a big improvement in schools, which have been guided by Wildlife Works. Since it was started in the year 2002, to mention a few Wildlife Works has helped by constructing new classrooms, renovating classes, putting up water tanks and buying desks for pupils. All these have led to the improvement of the academic standards of the concerned schools.

Apart from this Wildlife works has sponsored so many students to higher education. I believe in future the living standards of the community around will be highly improved. If it were not Wildlife Works then standards of living will remain poor for so many years. To add on this Wildlife woks has employed people to the Epz factory and others have been employed as Rangers at Rukinga sanctuary. This has improved the living standards of the people around. I am sure the proposed REDD project will help and benefit Members of the community around even more. I conclude by saying since Wildlife Works was introduced, the community has learnt that poaching of animals is not good for it reduces economy of our country. The community have also discovered that they should conserve and plant more trees so that they can get rains and water.

Yours at service

Peterson Msinga Mwatate
Head teacher- Kale primary school.
October 9, 2009

I' Renson Dio, Taita ranching company limited Director cum Treasurer applaud this project to take off immediately as at now the current environmental climate change is leading the world to disaster.
Being a resident of Kasigau location and border Marungu Location, I have personal benefited from Wildlife Works and the locals too, like sponsorship programs of our pupils to secondary schools and colleges not forgetting university levels, employment to our locals in Epz Maungu, construction of classrooms. In Taita Ranch headquarters the ranch benefited from Wildlife Works through giving four buffalos that were being kept as in a zoo by providing maize germ during this drought period. Taita Ranching through Mr. Renson Dio has benefited from Wildlife Works by being given vehicles for patrols by Mr. Rob Dodson in our Ranch, to mention but a few.

I propose the project to take off immediately.

Thanks

Renson Dio
Director
Taita Ranching Co. Ltd.
October 8, 2009

Comment A
This comment concerns the following aspects of the project.
1. G3 –project design and goals- schools construction and bursary scheme
2. CM1.1 – Estimate impacts on communities. While the achievements of the project are acknowledged and highly appreciated, there is room for improvement in order to justify the assertion that there are no negative impacts. For example facilities being provided for primary schools around Kasigau need to be extended to the very few secondary schools in the area. This will remove a feeling that students going from primary school to secondary school are moving a step backward rather than forward.

Comment B
'Climate section' is lacking relevant data on the rates of evaporation and transpiration associated with the eco-system in general and the area species of vegetations in particular.

Comment C
Annex D: Village profiles should be edited so as to enhance its credibility. There is further more in sufficient supporting statistical information to highlight claims of achievements of the project.

Engineer C.M Mwakulomba
Kasigau Location
October 9, 2009

Auditor's Note: The standard does not require that evaporation and transpiration associated with the ecosystem or species of vegetation be given. It is the opinion of the validator that the village profiles provided in the PDD are sufficient given the diversity of livelihoods and economies relative to other CCBA projects.

In regards to the respect that I uphold for Wildlife Works, as person, since I saw it as an organization to the time I came to meet it, I must say that if you don't know who they are then you better find out because its in involving yourself with them that you get to find the gold that you either have been throwing or the destruction that you can prevent yourself from.

As a person that is part of Wildlife Works project since 2002, through an education sponsorship program it's quite visible that Wildlife works cares for the well being of the community and the environment as a whole. I also have success stories that were initiated by wildlife works, throughout my sponsorship program, where we were informed on the importance of conserving the environment, hence started a project of planting trees to prevent the land from deforestation, and land erosions.

It's from Wildlife Works that people have learnt how conserve the environment, how to live with the wildlife, importance of Eco-system, effects of poaching, methods of farming within the community, hence making a relationship between animals and the people living along the rukinga sanctuary.

Economically, the communities that live around rukinga have had benefits through employment in the sanctuary, wardens, rangers etc, bright children have had a chance of studying to the 0-level (secondary education), also to the A-level(University) that can enable them secure job opportunities and be part of those who bring a change to the community.

Socially, the communities have grown in the sense that they known the importance of a clean environment, why they need to reduce deforestation, importance of trees, the nature of their environment, how to cope well with it and now the gaffer project that gives awareness of HIV/AIDS, and reducing the idleness of the youths through involving them in events like sports.

Wildlife works has been supportive, educative both in the social and the economic lifestyles and we hope that it will continue to dwell to see the fruits of the trees that it has planted for the betterment of the wildlife, the community, our lifestyle and our land as a whole.

I fully support the efforts of Wildlife Works and all its projects including the REDD project in making our land; people and animals have the best place for living in peace and togetherness.

Regards,

Sylvester Izaka,
IT & Network support engineer. (CBS)
October 8, 2009

Ever since the year the year 2000 when I came to know what actually Wildlife Works was, this organization has been of very great importance to many. Not only to individuals but also the community at large. I strongly believe that with the introduction of the Kasigau corridor REDD project, there will be even more benefits to the community.

Education could have been history to most people in this region. Through Wildlife Works classrooms were built in most primary schools in this region. This ensured smooth running of school programs without being affected by the weather changes since the formerly grass thatched classrooms were out of use during rainy season. Wildlife Works ensured that education of the bright children does not end at primary level but it is continued to high school. This was done through introduction of the sponsorship program and really benefited may including me.

Wildlife Works has also educated the community so as to live peacefully with wild animals in order to reduce human wildlife conflict. This has in return reduced poaching in the region since most people are now well informed with the dangers of bush meat.

I strongly support the introduction of the Kasigau corridor REDD project because it will create employment to most people in our community and the standard of living will change. Many children in this region will be able to go to high school and also a lot more trees will be planted in the region which will attract rain leading to improved agriculture.

Rehema Mwavuo
Volunteer Teacher – Marungu Secondary School.
Marungu Location, Nyangala Division, Voi District
September 30, 2009

Since the inception of Wildlife Works 11 years ago, great strands have been achieved. The most noticeable one being cited here: -

a) There has been full acceptance of Wildlife Works as part of our inheritance and so great measures have been put in place to conserve and co-existed. This has been due to education provided by Wildlife Works and other stakeholders.

b) The town of Maungu has grown, Wildlife Works has provided market for the local produce, it has cleaned and provided cleaning facilities and inseminated the inhabitants the need to live dirty free environment.

c) Wildlife Works – Maungu has offered employment to many locals i.e. security, drivers, mechanics, clerks, rangers etc curbing the rural urban migration and uplifting the living standards of our people.

d) Wildlife Works – Maungu has initiated, supported renovated and constructed classrooms. They have also contributed for other school related facilities in many neighboring schools, a measure ‘‘we” as Members of the community appreciated.

e) The GAFFER, which started through Wildlife Works, has given alternatives to our idle youth. They have been made occupied, shown the importance of sports, appreciating and accepting one another and accommodating other persons weaknesses through the sports spirit, a gesture that has made rather hostile communities to co-exist peacefully.

f) The GAFFER has also initiated the planting of trees in different schools and other public institutions around Wildlife Works. The community has really benefited. We fully support the REDD project.

g) The education trust under umbrella KELIMU TRUST has helped our destitute children to access hire school education so far some have even joined tertiary institutions still under KELIMU TRUST. Wildlife Works - Maungu has an upper hand in this and therefore it’s hard to detach this benefit from them.

h) During hard times such as drought and other natural disasters Wildlife Works come in hand to aid the affected people. This has been evident recently when the aged and the poor got relief food from Born Free organization still associated with Wildlife Works – Maungu.

And a move towards enhancing Wildlife Works will definitely assist us positively, their priority areas are always friendly and we are sure the carbon project, Kasigau corridor Reduced Emission from Deforestation and Degradation (REDD) will be a great advantage to us. The project diversity will finally explore to tap rather the idle recourses likely to sum up more profit and benefit to Wildlife Works then to us the surrounding community. The proposed REDD project will add value to the eco-system under the umbrella of Wildlife Works. Care and security of our Wildlife will be assured.

Our area is trans-passed by a railway line, trans Africa highway, and pipeline station all heavy emitters of carbon and carbon monoxide gasses. The carbon project (REDD) will absorb and reduce their entry into the atmosphere hence curbing fully or reducing the rate of global warming, we the community at large support the REDD project due to the above stated aspects.

Thank you

The resident – Maungu
Teacher and Instructor
V Wambua Masai
September 29, 2009

I as resident of Maungu, would like to welcome the Rukinga sanctuary REDD project. Wildlife Works have done a lot to the community since they started operations in 1998. Children have been taken to secondary school, I being among the beneficiaries of the program. All the bright kids from the poor families were being sponsored for higher education, which was started from 2002.

Wildlife Works has also created employment to the community by employing the youth as Rangers, Mass production machinist, and some at the green house project.

In 2002 Wildlife Works contributed about three hundred desks in Marasi primary school this is due to the children who had no where to sit in class.

Wildlife Works is bordered by the poor community who, big percentage depend on the charcoal burning and bush meat poaching for survival, therefore I will recommend for more projects in the area for more job creation.

Last and not least I am praying to God if Wildlife Works have can stay for long time and also keep on helping our people in Marungu community. Our living standard could not have been changed if Wildlife Works was not there.

Yours sincerely

Antony Lundi
Voi constituency – Maungu office
October 3, 2009

I would like to comment on the above mentioned project for Rukinga sanctuary.

Environment
What I never thought of and has been done by the project on environment is: seedlings provision to the local community, environment conservation within the area, which has led to a better and beautiful environment, modern jikos were constructed for the community which uses few firewood and also reduces heavy smoke to the atmosphere. On the sanitary has accompanied the community especially at Maungu town on rubbish collection.

Wild animals have been conserved in the sanctuary, which has improved tourist attraction in Kenya

Education
The project has already assisted the community by improved education in the area by doing the following: construction of classrooms, provision of desks, books and educating the bright student from the poor families from form one to form four.

Employment
The project has economically assisted the community by employing the Rangers who assist on environment, wildlife conservation and many other things.

Epz factory – by formation of the Epz many especially the youth got jobs.

Relief food
The project has assisted the community by provision on the relief food to the needy people.
In my opinion is to pray so that the project can be expanded to be a bigger project – We really appreciate the project for all what has been done for us.

CHIEF'S OFFICE
THE MANAGER
WILDLIFE WORKS
P.O. BOX 310 – VOI
October 5, 2009

SASIGAU CORRIDOR REDD PROJECT- PUBLIC COMMENTS.
VOTE OF THANKS:
In your endeavors to educate, reduce poverty, conserve and protect the environment both flora and fauna I give you kudos! Congratulations.
Your support in both primary and secondary class rooms construction, and providing higher education support to high performers who are under – privileged is un- surpassed.

COMMENTS: RUKINGA SACTUARY
RE: FORESTATION
Encourage more tree nurseries and provide free seedling in exchange for any indigenous tree planted, germinate seeds both indigenous, citrus fruits and climbers and disperse them aerially, and manually near fertile wetlands and swamps during rain season.

WILDLIFE CONSERVATION
The long distance covered by wild life both grazers and browser etc is in search of water. Construct more water pans and several boreholes, which can be wind-powered within the sanctuary.

SECURITY SURVEILANCE AND PROTECTION
Provide Rangers with sets of binoculars, V.H.F radios sets and construct strategic watchtower in flat grassy areas to monitor and report cattle movement, wildlife poachers, wood loggers, smoke etc.

CONSTRUCT ELECTRIC FENCES IN WILDLIFE – HUMAN CORRIDORS.

The animal ingressions into human settlement areas are well known. While the highly mountains act as a natural shield. Five key areas require attention, where cheap P.V.C poles and solar power electric fencing can be erected

FOOD AID: FOR TREES PLANTED AND SURVIVING
The foodstuff occasionally provided by Wildlife Works Epz should be complemented by the tree planted and surviving from the beneficiaries.

DISABLED PEOPLES
While Wildlife Works Epz has done so much to the community at large, it has not involved itself deeply in the disabled societies, or individuals. Provide basic training or seminars to the disabled and assist them with working tools example: shoes marker, carpenters, masons, electricians and brick marker etc.

ENEMIES OF THE SANCTUARY
Charcoal burners, tree cutter, poacher, honey hunters miners and prospective grass harvesters and cattle grazers, to mention but a few.
Solution: Electric fence at the strategic entry points, community policing i.e. employ informers and guards within the bordering community/ settlement.

Thanks you:

Briviant Shako – Technical Works
P.o. Box 25 Voi - Maungu
Email: Briviantshako@yahoo.com
TEL: 0726445458
October 9, 2009

Auditor's Note: It is not feasible for the project proponents to build an electric fence or provide surveillance to the degree suggested by this comment. The idea of installing fences was discussed during the site visit; however, it was concluded that an electric fence is too expensive and would require continual maintenance.

I would like to make my comments for the Project Design Document (PDD) for Kasigau corridor Reduced Emission Deforestation and Degradation (REDD) project as follows:-

Mount Kasigau – The Project needs to cover the mountain area by planting more trees because this is the only water source neighbouring the project zone. Like other water towers in the country, Mt. Kasigau is one of the affected due to harvesting of sandalwood and its ecosystem degraded. There is need to incorporate Mt. Kasigau by establishing tree nurseries in the villages around the mountain to mitigate the adverse sandalwood destruction effects to strengthen the weakened ecosystem at the water tower.

Mechanism should be set up to help the integrity of the project and help the local community from exploitation forces within and without the project area.

We appreciate Wildlife Works because they have contributed to the social, economic and well-being of the community living next to the project zone. In addition they have done improvements in schools

infrastructures, offering education bursaries to bright needy children in the community, aiding dame scouts in de-snaring and arresting the game poachers, establishment of tree nurseries have created environment awareness to the community.

Wildlife works also cooperate very well with the local community leaders in terms of development, like for example they participate in most of the local Baraza's to create wildlife and environment conservation awareness. They contribute in clean ups of the towns within the project zone. The community leaders also once assisted in eviction when the squatters invaded and developed part of Rukinga Wildlife Sanctuary (5000 Acres).

This project zone is neighbored by farmlands with no cash crops to sustain farmers; the severe drought that has exaggerated the area has forced most of the locals to destruct trees fro charcoal burning/logging and poaching for livelihood. I will request for drought resistant cash crops like jathropper and jojoba to be introduced in the farms neighboring the project zone in order to alleviate poverty.

Pascal Kizaka
Chief of Kasigau Location, Voi/Kenya
September 28, 2009

I as an assistant chief of Maungu community, I do appreciate a lot to what Wildlife Works have done to my people. Therefore I will highly support Kasigau corridor REDD project which is being implemented by Wildlife Works. Below is what has been achieved by Wildlife Works for the last ten years:-

In education, the community has benefited a lot due to the sponsorships offered through Wildlife Works. More than 50 kids have been sponsored to secondary school education and even some to university level. Some of these kids have finished their education and are now working within the community. These being the fruits of education, most of the parents are working hard to see their children go to school.

We've been working together with Wildlife Works in environment conservation especially in cleaning the towns. They have been helping the community with tools and materials for the clean ups activities, at the same time provide seedlings for environment cover. Wildlife Works has also introduced smokeless jikos to the community for clean environment.

The community has benefited a lot especially during drought seasons, the company together with other related companies help in donation of aid food to the poorest families within the area of the project zone.

Wildlife Works has created employment opportunities to the community from their projects within the company, among the project are: EPZ eco-factory, Rukinga wildlife sanctuary, Green house project and Jojoba research project.

I would like to congratulate Wildlife Works for all they have done to uplift the standard of living in this community and therefore welcome the introduction of REDD project as we are still in need especially water, this is still a major problem in the community and I hope it will be solved with the4 introduction of REDD project.

Thank you

Driscilah M. Ngele
Assistant Chief's Office
Maungu Sub-Location
P.O.Box 134 – 80300
VOI
October 5, 2009