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24 August 2018

Jeremy Freund
Vice President Carbon Development
Wildlife Works
242 Redwood Highway
Mill Valley, CA 94941
USA

Dear Mr. Freund,

This letter is in reference to your exemption request titled "Request for Exemption, Baseline Reassessment" submitted to Verra on 23 August 2018. It is our understanding that you are requesting an exemption from the 10-year baseline reassessment requirements set out in Section 3.1.10 of the *AFOLU Requirements, v.3.6* for the project "The Kasigau Corridor REDD Project – Phase I Rukinga Sanctuary". This section of the *AFOLU Requirements* requires that, for all REDD project types, "the project proponent shall, for the duration of the project, reassess the baseline every 10 years and have this validated at the same time as the subsequent verification". The project start date and start of the project crediting period is 1 January 2005, meaning that the baseline must be reassessed for monitoring of emission reductions/removals achieved after 31 December 2014.

Based on the information provided to Verra, it is understood that the project was undergoing and nearing completion of verification of the fifth monitoring period (1 January 2015 – 31 December 2017), when the validation/verification body raised a finding with respect to the 10-year baseline reassessment requirements during technical review. When this finding was raised, Wildlife Works requested clarification on the language of Section 3.1.10 of the *AFOLU Requirements* from Verra staff. Prior to this request for clarification, it was Wildlife Works' interpretation that the VCS rules required a baseline reassessment every 10 years following the date on which the project achieved validation, and not the beginning of the project crediting period. Further, when Wildlife Works requested clarification from Verra staff around the time of validation (which occurred 3 February 2011), Verra staff provided incorrect guidance that the 10 year baseline reassessment should occur based on the timing of the validation, therefore leading Wildlife Works staff to believe that baseline reassessment would not be required until 2021.

Considering the particular circumstances leading to this request, including the ambiguity of the language of the VCS Program rule, which does not explicitly state that the 10 year baseline reassessment period is from the project start date, Verra grants the project proponent, Wildlife Works, an exemption from the requirements of Section 3.1.10 of the *AFOLU Requirements, v.3.6* for the verification of the monitoring period 1 January 2015 – 31 December 2017 of the project titled "The Kasigau Corridor REDD Project – Phase I Rukinga Sanctuary". However, Verra requires that the project undergo reassessment of the baseline per the requirements of Section 3.1.10 of the *AFOLU Requirements* at the next verification. Verra will also issue a public clarification in respect of the requirements in Section 3.1.10 of the *AFOLU Requirements, v.3.6*.

When requesting issuance, the project proponent must present a copy of this letter to the registry administrator as evidence of the exemption. This letter will be uploaded to the Verra Project Database as a public document.

Yours Sincerely,



Sam Hoffer
Manager, VCS & CCB Programs
Verra