VERIFICATION REPORT THE KASIGAU CORRIDOR REDD+ PROJECT PHASE I – RUKINGA SANCTUARY (MP9)

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Summary

AENOR has carried out the verification of The Kasigau Corridor REDD+ Project Phase I – Rukinga Sanctuary (henceforth Kasigau Phase I) under the VCS and CCB Programs. The project is a conservation project (REDD+) implemented located in Southeastern Kenya, in Taita Taveta County, Coast Province. It is approximately 150 km northwest of the city of Mombasa. The Project Area covers all the land known as Rukinga Sanctuary, with a total of 30,168.66 ha. Rukinga is part of that land that forms a corridor (the Kasigau Wildlife Corridor) between the Tsavo East National Park and the Tsavo West National Parks to the East of the Marungu range.

The Project start date is January 1st, 2005. This monitoring period (M9) is the ninth monitoring period. It started on January 1st, 2022 and ended on December 31st, 2022. The Project length for KCRPI is 30 years and will end on December 31, 2034.

The purpose of verification is to have an independent, third party assess the project design. In particular, the project's emission reduction calculation; the monitoring plan implementation, and the project's compliance with relevant VCS and CCB requirements.

Overall, as a result of the different activities carried out during this monitoring period, it has been possible to reduce deforestation in the project area compared with the baseline scenario, resulting in the generation of 225,194 (tCO2e) net emission reduction for the 2022 period, according to the Non-Permanence Risk assessment the buffer discount obtained was 13%, therefore, after applying the buffer, the amount of tradable VCUs in the period is 195,918. The project implemented the following activities:

- Reduce community dependence on livestock and land through alternative IGAs
- Increase support of local institutional structures
- Help maintain intact and interconnected ecosystems through protection of ecosystems

In order to confirm that the monitoring report as documented meets the stated requirements and identified criteria, the verification consisted of the following three phases: i) a desk review of the project monitoring report and monitoring plan implementation; ii) follow-up interviews with project stakeholders with an on-site visit as well as review of project activities; iii) the resolution of outstanding issues and internal technical review followed by the issuance of the final verification report and opinion. In the course of the verification process 7 corrective actions (CAR) and 6 clarification (CL) were raised, all have been successfully closed.

The purpose of the assessment was to determine the conformance of the project with respect to the VCS Version 4 Standard; the Second Edition of the CCB Standard; The field visit took place from March 27th until April 1st, in which the audit team visited the project area, interviewed key stakeholders, staff and other related experts, and also reviewed the CCB-VCS-MR and supporting documents. The scope of the verification was to assess the conformance of information in the project design document with the VCS and CCB standards. Hence, once all issues detected were appropriately solved, AENOR carried out a final verification report and deems with reasonable level of assurance that the project complies with all of the verification criteria for VCS and CCB. The assessment team has no restrictions or uncertainties with respect to the compliance of the project with the verification criteria, hence, the audit team concludes that the net GHG emissions reductions or removals, for the lands included in the project boundary at verification stage has been quantified in accordance with VCS rules.

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1 INTRODUCTION

1.1 Objective

The objective of the verification audit was to conduct an independent assessment of the project to determine:

- The extent to which methods and procedures, including monitoring procedures, have been implemented in accordance with the validated project description, including the monitoring plan.
- The extent to which GHG emission reductions and removals reported in the monitoring report are materially accurate.
- The accuracy of the processes and activities carried out under the CCB standards which have also been implemented under the monitoring plan.

1.2 Scope and Criteria

The scope of the verification audit is to verify the emissions reductions and/or removals of the project, against the Verified Carbon Standard, the identified methodology and the validated CCB and VCS PDD, throughout the monitoring period from 1st January 2022 to 31st December 2022.

The objectives of this audit included a verification of the projects calculated removals with the Verified Carbon Standard requirements and any additional requirements of VCS AFOLU projects. In addition, the audit assessed the project with respect to the validated baseline scenarios presented in the CCB and VCS PDD and the fulfilment of the Climate, community, and biodiversity criteria against the CCB Standard.

The scope was defined as follows:

- The project and its baseline scenarios;
- The physical infrastructure, activities, technologies and processes of the project;
- The GHG sources, sinks and/or reservoirs applicable to the project;
- The types of GHGs that are applicable to the project; and
- The project monitoring period
- The climate, community, and biodiversity benefits.

The verification assessment was performed in accordance with the requirements detailed in section 4 of the VCS standard; including the following documents:

- VCS Standard v4.4 issued 17 January 2023
- VCS Program Guide v4.3 issued 17 January 2023
- Program Definitions v4.3 issued 21 December 2022
- AFOLU Non-Permanence Risk Tool v4.0 issued 19 September 2019
- CCB Program Rules v3.1 issued 21 June 2017
- CCB Standard second edition issued December 2008
- CCB Program Definitions v3.0 issued 21 June 2017

1.3 Level of Assurance

The assessment was conducted to provide a reasonable level of assurance of conformance against the defined audit criteria and materiality thresholds within the audit scope. Based on the audit findings, a positive evaluation statement reasonably assures that the project GHG assertion is materially correct and is a fair representation of the GHG data and information.

All the revisions of the verification report before being submitted to the client were subjected to an independent internal technical review to confirm that all verification activities had been completed according to the pertinent AENOR instructions required. The technical review was performed by a technical reviewer(s) qualified in accordance with AENOR´s qualification scheme for CDM/VCS validation and verification.

The threshold for materiality with respect to the aggregate of errors, omissions, and misrepresentations relative to the total reported GHG emission reductions/removals was one percent (1%), as established for large projects by the VCS Standard.

1.4 Summary Description of the Project

This is the 9th monitoring period for the Kasigau REDD+ Project Phase I – Rukinga Sanctuary (KCRPI). As the Project has now been in operation for 18 years, the Project Activity is fully implemented. The primary Project Activity is the conservation of the forest in the Project Area, which has been fully and successfully implemented and operated throughout the current monitoring period. This Project Activity directly resulted in the reduction of CO2e emissions reported in this monitoring report. The Project has additional Project Activities which address the focal issues identified by project stakeholders in the SBIA workshop, which include poverty, human/wildlife conflict, environmental degradation, agricultural issues and education. By addressing these focal issues, the project helps to alleviate many of the drivers of deforestation and forest degradation. The project also contributes to the mitigation of leakage and securing Project permanence. A primary focus of the Project Activities is to provide improved livelihoods either through direct employment with the Project or introduction of new or improved income-generating activities. On average, Wildlife Works retains a workforce of 58 across the Project Area. At the end of the reporting period, there were 63 employees in total, 2 in senior management positions. Of the 63, almost 30% (14) are female and more than 90% were from the local area (i.e., from one of the Project Zone or larger Taita Taveta County). In addition to the core project operations, revenue from carbon credit sales is also provided to the Wildlife Works Carbon Trust (WWCT) and is used to fund self-determined community projects. Under the WWCT, eight Projects were initiated (either ongoing or completed) by the Locational Carbon Committees (LCCs) during the reporting period (2022). Major activities included school infrastructure or supplies (1), construction or renovation projects (3), water (2) and health (2) projects. School projects involved classroom renovation, supply of school furniture and water harvesting and storage. Other water projects also involved water harvesting, storage and installation of water pipelines. Construction and health projects involved construction of water storage tank and supply of buckets and liquid soap to schools in Marungu location respectively. The total GHG emission reductions for this (M9) monitoring period are 195,918 t CO_2e (after buffer discount). There were no material changes made to the Project since the last verification.

2 VERIFICATION PROCESS

This is the Project's ninth VCS and CCBS verification. The scope of work included the concurrent VCS/CCBS verification of the project's latest monitoring period corresponding to the dates 01 January 2022 – 31 December 2022. This was a full verification (including a site visit) to assess the Project's conformance with the VCS and CCBS criteria outlined above, corresponding to the ninth monitoring period 01 January 2022 – 31 December 2022. It is noted that the verification of the Project Proponent's sister project, The Kasigau Corridor REDD+ Project Phase II – The Community Ranches (KCRPII) was concurrently conducted by AENOR as well.

Specific verification tasks included:

- Verifying that actual monitoring systems and procedures are in compliance with the applicable standards, methodology and tools, considering their application conditions, against the reality found in the field;
- Verifying that the implementation of the monitoring plan is in accordance with the validated Project Description Document (PDD).
- Evaluating the GHG emission reduction/enhancement data and express a conclusion with a reasonable level of assurance about whether the reported GHG emissions reduction/enhancement data is free from offset material misstatement of asserted emission reductions/enhancements;
- Verifying that reported GHG emissions data is sufficiently supported by evidence.
- Verifying the project has achieved net positive climate, community and biodiversity benefits as described in the monitoring report, including gold level for exceptional biodiversity and climate change benefits.

2.1 Audit Team Composition (*Rules* 4.3.1)

Name	Position in the team
Javier Cócera Cañas	Lead auditor
Adrián Vidal	Auditor
Daniel Masika	Auditor and local expert
José Luis Fuentes	Technical Reviewer
Daniel Bermejo	Technical Reviewer

The auditors have both English and Spanish language proficiency. The auditors have experience in social and cultural issues. They have been auditing CDM, VCS, CCB and GS projects in AENOR for more than 6 years all around the world.

Javier Cócera is a forest engineer with a Master in forest management. He has developed his career focused to the forest management. Mainly he has been working through sustainability in two ways: the main

one as forestry consultancy, developing forest management plans, working with GIS and LiDAR both in the field and the office and getting experience of the forest resources. The second one was developing environmental footprint projects and sustainability reports. Currently Javier is working in AENOR as auditor focused in AFOLU projects. Javier participated in courses about ISO lead auditing and have performed audits and certified projects in Europe, LATAM, Africa and Asia.

Adrián Vidal holds a Master's degree in Forest Engineering from the Technical University on Madrid, and a Postgraduate Diploma in Climate Change from the National University of Quilmes and the National University of Jujuy, with the support of UNEP. Prior to joining AENOR, he worked at the Basque Center for Climate Change (BC3) in the NDC ASPECTS project, carrying research in global governance, national policies, and modelling of Agriculture, Forestry and other Land Use (AFOLU) mitigation measures. He worked as an intern at the AFOLU Unit of the Transparency division of UNFCCC, providing support to the intergovernmental climate change process on issues related to land-use, land-use change and forestry (LULUCF), agriculture and REDD+. He also worked in urban forestry, landscape forest restoration and environmental consultancy, and collaborated in the Global Forest Survey project of FAO.

Daniel Masika is a Kenyan-based expert with experience in Climate Change, food security, and livelihood programs. His background consists of a bachelor in Agriculture and soil Sciences with modeling of cropping and agroforestry systems at the Master of philosophy level. Daniel has worked extensively in the NGO world to provide technical expertise and support food security, livelihood programs, agroforestry, disaster risk reduction, and natural resources management, and climate-smart agriculture technologies. In the past three years, Daniel has supported many REDD+ and forest restoration project audits under VCS and the CCBs protocols. Daniel can speak Swahili and has a deep knowledge of the social and cultural livelihoods of Africa.

- José Luis Fuentes is the manager of the Climate Change Unit of AENOR. He is a Forestry Engineer and has a Master in Business Administration and a Post-Graduate in Environmental Management. He has more than 15 years of experience in auditing, consulting and training activities related to environmental and carbon management projects. Jose Luis has actively participated in the audit of international sustainable development projects in several carbon schemes, such as the Clean Development Mechanisms (CDM), Verified Carbon Standard (VCS), Climate, Community and Biodiversity Standards (CCB), Gold Standard (GS) and carbon footprints (ISO 14067 and ISO 14064). Jose Luis has extensive technical knowledge about the regulatory framework, policies and technical provisions emanating from the Paris Agreement, the Kyoto Protocol and the Conferences of the Parties.
- Daniel Bermejo is a Spanish forest engineer with a Master in sustainable finance. He started his career in private consultancy working on topics as climate risk analysis and TCFD risks, EU Taxonomy, development of banking sustainable standards (agriculture, biodiversity and forestry) and environmental footprint projects and sustainability reports. He is currently working in AENOR as an auditor focused on AFOLU projects.

2.2 Method and Criteria

The verification was performed through a combination of document review, interviews and communications with relevant personnel and on-site inspections. The project was assessed for conformance to the criteria

described in Section 1.2 of this report. As discussed in this report, findings were issued to ensure that the project was in full conformance to all requirements.

AENOR carried out this verification report and deems with reasonable level of assurance that the project complies with all of the verification criteria. The verification activities in which risks were assessed were the evaluations of the monitoring system (data flow, data control procedures, etc.) but mainly the quality of raw data as well as sources and the spreadsheet calculations.

Previous to the start of the auditing process, the VVB developed an audit and sampling plan to obtain a general view of the audit, managing the times, the method and the criteria among other topics, and including as relevant part of the document, the way in which the VVB is going to assess the different parts of the project. In this sampling plan, there is a schedule for each activity, considering the field visit, stakeholder interviews, desk review, plots remeasurements and so on. The sampling of the different checking's, such as the stakeholder interviews or the plots sampling has been performed randomly, getting the whole boundaries of the project, with enough representation to reach the confirmed uncertainty.

AENOR reproduced and verified 100% of sheets in the spreadsheet of emission reduction calculations /9-17/ and the data-calculations carried out in those sheets for the monitoring period for the project area. The project area was 100% checked using the GIS database and shape files /18-29/. The carbon calculations were also 100% verified and crosschecked with validated values.

AENOR decided to carry out a deep and meticulous review of the sheets due to the following reasons:

- To verify the correct application of the methodology (formulae, equations.) and checked that data required to calculate the GHG removals are appropriately provided.

Based on the assessment carried out, AENOR confirms with a reasonable level of assurance that the claimed emission reductions are free from material errors, omissions or misstatements.

In addition, AENOR confirms that sufficient evidence was presented for the reported net anthropogenic GHG emission reductions and that there is a clear audit trail that contains the evidence and records that validate the stated figure in this verification report since:

- Sufficient evidence available: The project participant has provided 100% of data used in the calculations to achieve the final amount of GHG emission reductions reported.
- Nature of evidence: The raw data were collected from reliable sources. They are detailed in the project documents and have been provided to the verification team and are appropriately detailed in section 2.3 of this report.
- Cross-checked evidence: AENOR cross-checked the collected information through an on-site inspection to the project area and reproducing calculations. Also, complementary technical meetings were carried out to ensure the accuracy of the data and improve the following.
- The field visit took place between March 27 and April 01 of 2023. It is noted that the verification team performed the audit of both projects KCRP I and KCRP II, which are located beside each other. During these days, the audit team focused mainly on interviews with stakeholders, project staff or participants as well as review of the inventory plots and CCB parameters. Other topics were also assessed, both on site and remotely.

Hence, AENOR confirms that the stated figures in the monitoring report are correct and confirms that is able to certify net anthropogenic GHG removals based on verifiable and reliable evidence.

2.3 Document Review

The monitoring report /6/, project description, and supporting documentation were carefully reviewed for conformance to the verification criteria and consistency with the validated project. The audit team examined the baseline data gathered from the baseline determined for this Region, spreadsheets used to enter, and compile information required by the methodology and reproduced the GHG emissions reductions calculations presented in the spreadsheet models to obtain same results than those appearing in the Monitoring report. The Non-Permanence Risks Report /55/ for this monitoring period was assessed, as well.

The list of all documents provided by the Project Proponent for this verification, and reviewed by AENOR is found in appendix 2.

2.4 Interviews

The AENOR's verification team conducted interviews with project proponent; local stakeholders; and key personnel involved in the project activity, in order to confirm selected information and to resolve issues identified in the document review.

The field visit took place from 27/03/2023 to 01/04/2023 in which the audit team visited the project area, interviewed key stakeholders, staff and other related experts, and also reviewed the monitoring report and supporting documents. The people interviewed were those directly affected or involved in the project activity and in some cases were just indirectly affected. Finally, some activities stated within the MR were also reviewed during the on-site visit and verified with the information provided, specifically for the CCB label. AENOR was the responsible of selecting the people to interview after the PP provided the full list of employees, the organizational chart /1/ or the roles of different people among the communities. AENOR decided which ones of the lists were selected to be interviewed, individually or in group. The interviews were carried out in different rooms or locations in which the audit team had the opportunity to ask about everything related to the project, engagement, grievances or whatever without their declarations being affected. AENOR confirms that the interviews and the way in which they were performed are totally free of influence, and therefore, the interviewees were free of coercion.

Additional to site visit, some meetings via teleconferences were carried during the year 2023 in order to additionally review the calculation and verify the processing data from satellite images. The scope of the verification was to assess the conformance of information in the monitoring report with the VCS and CCB requirements.

The following table summarizes the interviews carried out during the process.

	Name	Role/Relation to the Project	Date of Physical interview
1	WWS management staff	Mangamenent (initial meeting)	28/03/2023
2	Amos Matoke	Head HR	28/03/2023

3	Ramla Badawy	Assistant HR	28/03/2023
4	Shariffa Abdi	Head Finance	28/03/2023
5	Michael Mwadisha	Machine operator	28/03/2023
6	Allan Kiplimo	Assistant printer	28/03/2023
7	Brown Kimonge	Screen printer	28/03/2023
8	Mutua Kasokei	Screen printer	28/03/2023
9	Virginia Mumbua	Q.C printer	28/03/2023
10	Allan Njogu	Printer Manager	28/03/2023
11	Mwangi Githiru	Chief Conservation Officer	28/03/2023
12	Pius Lokwanya	Carbon Sampler	29/03/2023
13	Ambrose Mwanguo	Carbon Sampler	29/03/2023
14	Moses Mwamodo	Carbon Sampler	29/03/2023
15	Daniel Kirui	KWS officer	29/03/2023
16	Omma Sudi	WWS Ranger	29/03/2023
17	Augustine Mwaganda	Carbon Sampler	29/03/2023
18	Mohamed Tsuma	Carbon Sampler	29/03/2023
19	David Mwakio	Carbon Sampler	29/03/2023
20	Humprey Mwandango	WWS driver	29/03/2023
21	Solomon Morris Makau	Carbon Sampler	29/03/2023
22	Mwagwaza Emmanuel	WWS driver	29/03/2023
23	Khamisi Ndoru	Charcoal producer	30/03/2023
24	Titus Mwamburi	Charcoal producer	30/03/2023
25	Mohamed Ndoru	Charcoal producer	30/03/2023
26	Ramadhan Ndoru	Charcoal producer	30/03/2023
27	Agatha Wanza	Charcoal producer	30/03/2023
28	Nicolas Kipkulei	Ranger KWS	30/03/2023
29	Eric Chea	Ranger KWS	30/03/2023
30	Janet Demu	Community member	30/03/2023
31	Mercy Sidi	Community member	30/03/2023
32	Petronilla Jumwa	Community member	30/03/2023
33	Eunice Mwangombe	Community member	30/03/2023
34	Lucy Madoka	Community member	30/03/2023
35	Mercy Mwangoma	Community member	30/03/2023
36	Eliza Kisombe	Community member	30/03/2023
37	Rose Ndambo	Community member	30/03/2023
38	Silvia Kijiri	Community member	30/03/2023

39	Vainece Ngua	Community member	30/03/2023
40	Grishon Mwasi	Community member	30/03/2023
41	Gladys Mbuwa	Community member	30/03/2023
42	Mary Kitiro	Community member	30/03/2023
43	Charity Mwashighadi	Community member	30/03/2023
44	Caroline Kitiro	Community member	30/03/2023
45	Lilian chiyonzo	Community member	30/03/2023
46	Rose Kamondo	Community member	30/03/2023
47	Bareline Lwanzo	Community member	30/03/2023
48	Norah Kisaka	Community member	30/03/2023
49	Purity Driscillar	Community member	30/03/2023
50	Emma K.	Community member	30/03/2023
51	Rachael Nyiro	Community member	30/03/2023
52	Christine Mwaghuri	Community member	30/03/2023
53	Esther Kamando	Community member	30/03/2023
54	Henritah Manga	Community member	30/03/2023
55	Dinaice Zighe	Community member	30/03/2023
56	Eunice Makali	Community member	30/03/2023
57	Mercy Nyamu	Community member	30/03/2023
58	Catherine Kairo	Community member	30/03/2023
59	Magdaline Lukeli	Community member	30/03/2023
60	Elizabeth kamau	Community member	30/03/2023
61	Benard Amakobe	Biodiversity officer	30/03/2023
62	Odline Chanya	Biodiversity officer	30/03/2023
63	Omar Ambii	WWS Ranger	30/03/2023
64	Alfred Mwachaba	WWS Driver	30/03/2023
65	Laurian Lenjo	Community Relations Manager	30/03/2023
66	Protus Makundi	Assistant Community Relations Manager	30/03/2023
67	Elizabeth Nyambu	Assistant Community Relations Manager	30/03/2023
68	Daniel Munyao	Factory Manager	30/03/2023
69	Norah Matunda	Supervisor	30/03/2023
70	Jacinta Kivuva	Cutter	30/03/2023
71	Jeridah Wakesho	Helper	30/03/2023
72	James Jira	Machinist	30/03/2023

73	Festus Mutua	Machinist	30/03/2023
74	Mr. Tsuma	Deputy Headteacher Bahakwenu Primary	30/03/2023
75	Costance Madamu	Eco charcoal cordinator	30/03/2023
76	Juma Mnyika	Eco charcoal	30/03/2023
77	Elizabeth Munyao	Eco charcoal	30/03/2023
78	Wilfred mcharo	Eco charcoal	30/03/2023
79	Suleiman Mwandeje	Eco charcoal	30/03/2023
80	Samuel Mazola	Eco charcoal	30/03/2023
81	Mwamlongo Kaingu	Eco charcoal	30/03/2023
82	Patrick Mwadeghu	Project Coordinator	30/03/2023
83	Henry Kifuso	Clinical Officer Kasigau Hill	31/03/2023
84	Joshua Kitiro	Carbon Sampler	31/03/2023
85	Jacob Mwadai	Carbon Sampler	31/03/2023
86	Mathias Kakoi	Carbon Sampler	31/03/2023
87	Allan Chondo	Carbon Sampler	31/03/2023
88	Darius Mkala	Carbon Sampler	31/03/2023
89	Benard Mwadate	Carbon Sampler	31/03/2023
90	Gift Nyambu	Carbon Sampler	31/03/2023
91	Morris Mwindi	Carbon Sampler	31/03/2023
92	Michael Mwakio	Carbon Sampler	31/03/2023
93	Cyprian Mwawasi	Carbon Sampler	31/03/2023
94	Polycap Moses	Carbon Sampler	31/03/2023
95	James Kirinambori	Teacher Wumari Primary school	31/03/2023
96	Ramadhani Rashid	Chairman Bursary Committee	31/03/2023
97	Joseph Kennedy	MCA Mwatate Ward	31/03/2023
98	Rachael Mwori	LCC member	31/03/2023
99	Hellen Lusas	LCC member	31/03/2023
100	Mwande Ben	LCC member	31/03/2023
101	Martina Mwanewe	LCC Vice Secretary	31/03/2023
102	Habiba Mghazo	Bursary Member	31/03/2023
103	Damaris Mwakiringo	Bursary Member	31/03/2023
104	Kelvin K Malalo	Bursary Member	31/03/2023
105	Raphael Kimbio	Ward Administrator	31/03/2023
106	Nicholas Kambucha	Chief	31/03/2023
107	Lilian Mwakali	Project Coordinator Mwatate CCO	31/03/2023
108	Margaret Kasha	Office Assistant Mwatate CCO	31/03/2023
109	Joseph Mwasi	LCC Chair	31/03/2023
110	Joseph Mwakima	Community Relations Officer	31/03/2023
111	Mary Katini	Project Coordinator MDF	31/03/2023

112	Evan Mwazo	Chairman MDF	31/03/2023
113	Ludladuck Kamande	MDF Member	31/03/2023
114	Margaret Muthoni	Office Assistant MDF	31/03/2023
115	Dorine Wanjiku	CBO Member	31/03/2023
116	Michael Mulevu	Assistant Chairman CBO	31/03/2023
117	Aginela Mwatela	MDF Member	31/03/2023
118	Samuel Mwasingo	MDF Member	31/03/2023
119	Edward Mwakale	CBO Member	31/03/2023
120	Gilbert Mwaro	CBO Secretary	31/03/2023
121	Benard Kirenge	Chief Mwachabo	31/03/2023
122	Barbira marera	Treasurer	31/03/2023
123	Roman Mwasi	Secretary	31/03/2023
124	Monica Makosi	Trainer Elimika CBO volunteer	31/03/2023
125	Jackline Mawia	Assistant Community Relations Officer	31/03/2023
126	Hannah Kea	Mwaniko Women group Hadithi product supplies	31/03/2023
127	Rebecca Mututa	Community relations officer	31/03/2023
128	Rose Mwangozo	Teacher Itinyi primary school	31/03/2023
129	Emily Sundua	Teacher Itinyi primary school	31/03/2023
130	Suleiman Mwamanga	Community Elder-Itinyi water tank custodian	31/03/2023
131	Renalda Magiri	Community Elder-Itinyi water tank custodian	31/03/2023
132	Geoffrey Mwangi	Senior Research Scientist	31/03/2023
133	Evans Mwachoki	admin Ranger WWS	31/03/2023
134	Geoffrey Mwanjewe	Ranger WWS	31/03/2023
135	Simon Kipsang	Ranger WWS	31/03/2023
136	Lucian Mwanyolo	Driver Ranger WWS	31/03/2023
137	Nick Taylor	Project Lead	31/03/2023
138	Daniel Zuma	Ranger WWS	31/03/2023
139	Eric Sagwe	Head Ranger WWS	31/03/2023
140	Chrispin Mazozo	Ranger WWS	31/03/2023
141	Jema Funah	Ranger WWS	31/03/2023
142	Tabitha Kingori	Ranger WWS	31/03/2023
143	Joseph Lewaga	Ranger WWS	31/03/2023
144	Agneter Katui	Ranger WWS	31/03/2023
145	Norman Mwakajana	Ranger WWS	31/03/2023
146	Jane Ngati	Ranger WWS	31/03/2023

147	Paul Msheshe	Ranger WWS	31/03/2023
148	Julius Zuma	Ranger WWS	31/03/2023
149	George Thumbi	Agribusiness Manager Greenhouse	01/04/2023
150	Paul Kombo	Data keeper	01/04/2023
151	Dally Wambugha	Assistant Nursery attendant	01/04/2023
152	Velentina Mwakazi	Assistant Nursery attendant	01/04/2023
153	Nick		01/04/2023
154	Geoffrey Mwangi	Senior Research Scientist	01/04/2023
155	Cara Braund	WWS Support Manager	01/04/2023
156	Thomas Kasimu	Chef – Kivuli Camp	02/04/2023
157	Simon Kizaka	Camp Manager – Kivuli camp	02/04/2023
158	Christopher Ruma	Housekeeper – Kivuli camp	02/04/2023

2.5 Site Inspections

The objectives of the on-site inspections performed were mainly to cross check the description provided in the MR, related to the VCS and CCB requirement implemented by the proponent, including:

- Ensure that the geographic area of the project as reported in the MR and PDD and the supporting KML is in accordance with the VCS standard 4.4
- Perform a risk-based review of the project area to ensure that the project conforms to all other requirements of the VCS rules and the methodology.
- Observe the Project Proponent's evidence and collect and record data in order to assess whether data collection techniques conform to the monitoring plan and related documentation and to evaluate data quality control systems.
- Select samples of data and information for verification in order to meet a reasonable level of assurance and to meet the materiality requirements of the project, as required by the VCS Standard;
- Perform a risk-based review of the project area to ensure that the project is in conformance the eligibility requirements of the VCS rules and the applicability conditions of the methodology; and
- Interview the key personnel involved in the mentoring and observe monitoring practices
- Interview local stakeholders, staff and other people involved in the project
- Review activities such as patrolling, monitoring or trainings.

The schedule that the audit team followed during the visit was similar to the following:

Activities	**Location**	**Date**	**Duration (hours estimated)**	**Day**
Arrival Nairobi	Nairobi	27/03/2023	Not applicable	0

Trip from Nairobi to Voi	Nairobi	27/03/2023	Not applicable	
Arrival to Project Area	Voi	28/03/2023	Not applicable	
Initial meeting	Project area	28/03/2023	1	
Unique and standardized benenfits. Phase I and Phase II • Employment • Trainings • Livelihoods Constructions	Project area	28/03/2023	3	1
HCVs and their henhancement. Phase I and Phase II	Project area	28/03/2023	2	
Climate change adaptation benefits		28/03/2023	1	
Stakeholder engagement • Grievance mechanism • Solved grievance • Project distribution Meetings and consultation	Project area	29/03/2023	4	2
NPRR / Cashflow / Ex-post Carbon calculations	Project area	29/03/2023	4	
Interviews with personnel: • Management capacity • Joshua Kitiro • Communities: Taita / Duruma / Kamba / Sanya Kasigau staff: different roles and employments. Differentiate Phase I and Phase II	Project area	30/03/2023	8	3
Plots review: • Phase II: strata KT; CH; MG; MA; KA; WU; KB; T; WG; SA; ND • Phase I: strata T	Project area	31/03/2023	4	4
Community: differentiate Phase I and Phase II • Benefits • MP Implementation activities	Project area	31/03/2023	4	
Biodiversity: • Comparison without project • MP Offsite effects	Project area	01/04/2023	3	5
SDVista activities and achievements. Phase I and II	Project area	01/04/2023	3	
Other topics: Tree Nursery; Hadithi Shop; Rangers	Project area	01/04/2023	1	
Final meeting and closure of the audit	Project area	01/04/2023	1	
Trip to Nairobi	Nairobi	01/04/2023	Not applicable	

2.6 Resolution of Findings

All documentation provided by the Project Proponent was assessed against the most recent version of the relevant VCS guidance document. Several clarification requests (CL) and corrective action requests (CAR) were raised and submitted to the Project Proponent, which addressed them either by providing to the audit team the requested information or by making the appropriate corrections. Updated versions of the documentation were submitted by the Project Proponent and the audit team reassessed them against the guidance documentation. Specifically, 7 CAR and 6 CL were raised and properly closed.

All findings issued by the AENOR audit team during the verification process have been closed for both VCS and CCB Standards. All findings issued during the verification process, and the inputs for their closure, are described in Appendix 2 of this report.

2.6.1 Forward Action Requests

No Forward Action Requests were raised to the PP during this process.

2.7 Eligibility for Validation Activities

AENOR has conducted the verification at the same time considering the paragraph 4.1.23 and 4.1.24 VCS standard. AENOR holds accreditation for validation and verification for the sectoral scope 14. Agriculture, Forestry, Land Use.

3 VALIDATION FINDINGS

3.1 Participation under Other GHG Programs

The project has not been registered, and is not seeking registration, under any other GHG programs. The project is looking for validation under the VCS and CCB Program at the same time the verification is being carried out.

3.2 Methodology Deviations

The PP has not deviated from the methodology during this monitoring period. The Audit team has assessed the methodology and considers that the PP is aligned with the requirements of the methodology and additional tools.

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

The PP has described the following Project description deviations for the current Monitoring period:

- The PP has improved the forest inventory by including the measurements of herbaceous biomass. It has been explained in the Monitoring Report, and assessed onsite by the verifiers. The audit team has reviewed the SOP of inventory /30/ and it has been contrasted with the information explained by the inventory teams during the reproduction of the biomass plots carried out during several days in Kenya.
- During the desk review of the documentation, the VVB detected a minor mistake with the crediting period validated which was corrected but not explained. A mistake in the crediting

period dates was identified in the validated PD, which incorrectly shows the 30-year crediting period from the start dates of January 1, 2005, ending on December 31, 2035. The correct end date of the initial 30-year crediting period is December 31, 2034. However, it is the 9th verification period and it was verified several times. The VVB has reviewed the PDD, previous MRs and VRs, and also contrasted the information with the Verra Registry and asked directly to the PP to obtain real information about this change.

The audit team considers that the project description deviations are valid and do not affect the correct development of the project and, otherwise, they will improve the accuracy and transparency of the project because of the improvement of the monitoring techniques. Therefore, AENOR considers that this deviation only affects the monitoring of the project and does not impact the applicability of the methodology, additionality or the appropriateness of the baseline scenario. This deviation is in compliance with the methodology VM0009 requirements.

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

Section 2.2.3 of the MR outlines minor changes to the validated PD that have occurred over the life of the project and that are applicable to each specific monitoring period. Previous minor changes to the PD are identified for M2, M3, and M4, and these past deviations are considered to have been approved in the corresponding verification audits. Minor changes enacted during previous monitoring periods to the project description were implemented during the current reporting period. These changes are considered to remain applicable to the current monitoring period (M9), though no further alterations related to the project elements previously changed were made.

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

The monitoring plans have already been validated and the VVB considers that the implementation is appropriate. Therefore, this section is not applicable.

4 VERIFICATION FINDINGS

4.1 Public Comments (*Rules* 4.6)

The monitoring report was submitted to the VCS website for a 30-day public comment period from March 8th to April 7th, 2023. No public comments were received during the verification process. The audit team confirmed this issue against public information in VERRA database platform.

4.2 Summary of Project Benefits

Section 1 of the monitoring report provides information about the project benefits. Achievements for the current monitoring period and for the project lifetime are detailed with specific data per categories.

Data are supported with evidence and records checked during the interview with stakeholders, review of activities implemented and desk review. The section has been completed appropriately with data from the sources provided such as GIS package /18-29/, records of trainings /62/, employees payroll, and other spreadsheets /9-17/ as well as during the onsite visit in the country.

As specific and remarkable achievements for the current monitoring period the monitoring report in its section 1.2 states the net emission reductions of 195,918 tCO2e for the monitoring period. It has been assessed with the proper review of the calculations /9/ as final step of the desk review process. The standardized benefit metrics, including: GHG emission reductions or removals; Forest cover; Training; Employment; Livelihoods; Health; Education; Water; Well-being and Biodiversity conservation. The audit team reviewed information reported in this section against supporting evidence listed in appendix 1 and further information referenced in proper sections stated in standardized benefits; complementary, due to the onsite audit visit, the VVB was able to personally evidence and crosscheck all this information, the audit team has verified that all achievements reported are substantiated with information provided in the body of the CCB/VCS-MR. For example, during the onsite visit, the audit team visited the waterhole constructions, the greenhouse employment and the women dedication or some of the health centres of the area.

Some of these benefits are for example job creation for approximately 63 employees (M9) of who 28% are women, some of them were interviewed by AENOR; or the protection of different endangered or critically endangered species, such as Elephants, Eagles, Grevy´s zebras, etc. The sighting of the animals was directly by transects or by images from the camera trap of the 2022 year.

In opinion of AENOR, the project benefits are credible based on the supporting documents provided by PP and evidence received during the AENOR's stakeholders interviewed, records checked and field records.

4.3 General

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

Section 2.2 of the monitoring report provides the relevant milestones occurred during the last years in the project area related to the management and development of the project to understand its implementation status. These milestones are directly linked with the success to implement and achieve the goals established by the project in the community and biodiversity areas.

Table in section 2.2.1 of the monitoring report provide complete information of activities carried out and impacts of these activities for the goals of the project. Project objectives and activities to reach them are analysed with their outputs and outcomes for the present monitoring period.

The most important milestones are described in the in section 2.2.1 of the monitoring report. The following table summarizes the assessment carried out by the audit team.

Date	Milestone(s) in the Project's development and implementation	
01 January 2005	Start of Project activity, protection of forest from deforestation and degradation, Project Start Date,	Assessed on the PDD
2007— Present	Tree Nursey	Assessed on the PDD and with onsite inspections
Since project start	Jojoba propagation	Assessed on the PDD and with onsite inspections

(2005) - Present		
Since project start (2005) – Present	Wildlife Works Greenhouses and selling point	Assessed on the PDD and with onsite inspections
Since project start (2005) - Present	Reforestation of Mt. Kasigau and surrounding area	Assessed on the PDD and with onsite inspections
Since project start (2005) - Present	Wildlife Works Carbon Trust: School Construction and Renovations, Infrastructure provision, Bursary Scheme, Agri-business, and Water and health-related Projects.	Assessed on the PDD and with onsite inspections
Since project start (2005) - Present	Community Wildlife Scouts	Assessed on the PDD and with onsite inspections
Since project start (2005) - Present	Forest and Biodiversity Monitoring	Assessed on the PDD and with onsite inspections. The MR and other procedures were also checked
Since project start (2005) - Present	Project Product Sales and Marketing	Assessed on the PDD and with onsite inspections and interviews
Since project start (2005) – Present	Security and Ranger Patrols	Assessed on the PDD and with onsite inspections and interviews
Since project start (2005) - Present	REDD+ Carbon Inventory Monitoring	Assessed on the PDD and with onsite inspections
2007 – Present	Tree Nursey	Assessed with onsite inspections and interviews
Built in 2012 – Maintained to the Present	Group Ranch Office Renovations / Construction	Assessed on the PDD and with onsite inspections

30 November 2012	VCS Verification M_2	Assessed on Verra Registry
05 December 2012	CCB Verification M_2	Assessed on Verra Registry
2012 - Present	Support to Community Based Organizations: Sagalla Conservation and Development Forum (SCDF), Mwatate District Stakeholders' Forum (MDSF) and Mwachabo Development Forum (MDF), Marungu Hill Conservancy Forum (MHC), Kasigau Development Trust (KDT) and Mackinnon Road CBO.	Assessed on the PDD and with onsite inspections
Started in testing phase 2011, moved to new facility on Taita Ranch early 2013 – Present	Wildlife Works Eco-Charcoal Production Facility	Assessed on the PDD and with onsite inspections
New building operating from 2013 – Present	Wildlife Works Soap Factory	Assessed on the PDD and with onsite inspections
2013 - Present	Local Production Clothing Factory	Assessed on the PDD and with onsite inspections
2013 – Present (some operations disrupted by COVID-19)	Wildlife Works Health Projects	Assessed on the PDD and with onsite inspections
2014 – Present	Support to Establishing / Maintaining the Tsavo Conservancy	Assessed on the PDD and with onsite inspections
Officially opened in 2019 – Present	Ecotourism Projects: Kivuko Eco Camp in Taita	Assessed on the PDD and with onsite inspections.

15 December 2022	CCB Verification M_8	Assessed on the Verra Registry

The MR adequately details the implementation status of the project activities, and the effectiveness of the established monitoring systems was demonstrated to the verifiers. Clear processes were confirmed to be in place for collecting and reporting on data to demonstrate the status of the project. The monitoring systems and procedures implemented by the PP were found to be consistent with the descriptions of the monitoring methods given in the validated PD and related monitoring plan documents. These range from monitoring of soil and biomass carbon stocks, tracking direct employment and improved income generating activities for local communities to demonstrate levels of improved livelihood for community members, and monitoring of biodiversity found on the project area through a variety of mechanisms.

GHG emission reductions generated by the project are registered with the Verra program, and privately traded in the voluntary carbon offset market by the PP. As indicated in the M9 Monitoring Report, the project is not registered with, nor is seeking registration with any other GHG Program. The project does not seek other forms of environmental credit, does not take part of other GHG programs and has not been rejected by any other GHG programs as was confirmed with stakeholders during the site visit.

Section 2.1.10 of the MR outlines the project's alignment with sustainable development. With the primary focus of the project activities being related to mitigation of deforestation and human/wildlife conflict as well as providing improved livelihoods for community members, the project is contributing to a variety of the 17 United Nation Sustainable Development Goals (SDGs) which have been adopted by the host country. Specifically, the climate, community and biodiversity benefits of the project are considered to directly contribute to SDGs 1: No Poverty, 4: Quality Education, 6: Clean Water and Sanitation, 8: Decent Work and Economic Growth, 10: Reduced Inequalities, 11: Sustainable Cites and Communities, 13: Climate Action, and 15: Life on Land. The verifiers assessment of the project's implementation over M9 gave reasonable assurance that the project has contributed to each of these SDGs as supported by project documentation, stakeholder interviews and direct observations in the field.

Previous deviations to the PD are identified for M2, M3, M5, M6, and M7, and these past deviations are considered to have been approved in the corresponding verification audits. These changes are considered to remain applicable to the current monitoring period (M9). As a result of the verifier's assessment, they are reasonably assured the validated project design and implementation over M9 is aligned with the validated PD in spite of small changes or improvements have occurred. This determination was supported by the verifier's review of the validated PD, M9 Monitoring Report, and interactions with PP management. Previous minor changes to the PD are identified for M2, M3, and M4, and these past deviations are considered to have been approved in the corresponding verification audits. Minor changes enacted during previous monitoring periods to the project description were implemented during the current reporting period. These changes are considered to remain applicable to the current monitoring period (M9), though no further alterations related to the project elements previously changed were made.

4.3.2 Risks to the Project (G3.5)

Section 2.2.5 of the monitoring report addresses the natural and human induced risks and how the project considered several initiatives to diminish these risks to the project benefits. The main possible risks identified by project proponent are:

- Changes in legislation: As the Government of Kenya has been supportive of KCRPI and there is no recent history of expropriation of private conservation lands, this risk is considered very low. The several number of verifications and the good position of this Project acting as a biodiversity corridor between two important National Parks, is clear evidence to demonstrate that the change in the legislation would poorly affect the development of the Project.
- Income: Financial sustainability was modelled at extremely conservative carbon offset credit sale values and volumes. This Project is a very popular Project with high potential value in the marketplace. The likelihood of financial insolvency is therefore deemed to be very low. The Audit team has verified onsite the financial evidence and also checked that the people is really involved with the Project, which is clear demonstration of the popularity and good development.
- Crop failure: the failure of crops could be high by different factors. However, the Kasigau team has developed other alternatives to provide other sources of income to the surrounding communities. For example, the greenhouse project.
- Invasion of cattle grazers: Somalis have used the land in this area to feed and water their cattle over the years, sometimes with permission from landowners and sometimes without. However, given the increasing aridity in the area, we believe Somali cattle herders will be forced to look elsewhere for rangelands. The PP implements patrolling activities to fight against illegal activities. The VVB has reviewed the patrolling itineraries, the results and also has been moving around the project area through the different transects of patrolling.
- Drought: drought is an increasing reality in this region of Kenya. It directly affects to wildlife and cash crops. the PP has built several waterholes specifically designed for the fauna. Complementary, sustainable technics and drought adaptative plants are being used to minimize droughts problems.
- Fire: grass fires are common in the region due to intense heat and dry conditions. Naturally occurring fires are extremely rare, with the majority caused by humans, either accidental or intentionally set. The strategy is to continue educating the local population, especially the youth, about the dangers of burning fallows, which is often done to improve grazing for their animals.
- Human-wildlife conflict: Increased presence of large fauna within the project area, specifically elephants, could lead to conflict with community members if the elephants wonder outside of the project area. The VVB has assessed the patrolling activities, the grievance about fauna conflicts, the methods to minimize these risks as well as new techniques used by the PP, such as the fences with steel pieces which make a metallic sound when the animals or the elephants try to go inside. The PP has showed the direct results of these fences and the VVB considers that the effects are positive and effective.
- Complementary, the PP has calculated the risk through the Non-Permanence Risk Report /55/, and deems that the assessment has been performed correctly. AENOR deems that the Project Proponent correctly identified the risks to the project, and it is implementing actions to reduce or diminish the negative impacts of these risks in the benefits on the Climate, community and biodiversity.

4.3.3 Enhancement of High Conservation Values (G3.6)

As described in the MR, the primary HCV related to community well-being is identified as the overall health of the local ecosystem, and the related ecosystem services and cultural values it supports; security provision, habitat improvement, mainstreaming monitoring and supporting research and conservation in critical landscapes. The protection and preservation of the forest resources found within the project area by the PP helps to support these HCVs. The WWC greenhouse operations provide tree seedings to communities for enrichment planting in the surrounding landscape with the intent to reduce pressures on the ecosystem. Community based greenhouses have also been established to promote and support agriculture and farming practices by local community members, and a number of other tree planting initiatives have also been started by the project.

The verifiers uncovered no evidence that any HCVs have been negatively impacted as a result of the project activities. On the contrary, the protection of the forest on the project are and community based projects implemented in the surrounding communities are viewed as supporting the maintenance and enhancement of HCVs. Youth educational programs supported by the PP as well as the Community Scouts established in the local communities are also considered to promote awareness of environmental protection and the monitoring of any impacts to HCVs that could occur.

The verifiers determined that none of the planned and implemented project activities would result in negative impacts on biodiversity related HCVs found within the project area. This conclusion was supported from observations made in the field and through interviews with project staff during the site visit. By safeguarding HCV biodiversity elements, protecting forested ecosystems and habitats within and around the project area, reducing the potential for incidence of human-wildlife conflict and maintaining wildlife corridors, the verifiers are reasonably assured that the project activities as a result of the PP's interventions did not result in any negative impacts to biodiversity HCVs.

4.3.4 Benefit Permanence (G3.7)

The project is currently taking active measures to enhance the climate, community, and biodiversity benefits of the project beyond the project crediting period. The measures proposed to guarantee the permanence of climate, community and biodiversity benefits are among others job training, such as in the Eco-Factory, members of the surrounding communities are currently building their capacity and gaining new skills that will last into the foreseeable future. Carbon revenues have and will continue to change the face of the surrounding communities, and through KCRPI, Wildlife Works has effectively raised awareness about the link between forest and wildlife protection and the availability of sustainable employment. We have made detailed job creation information available to the public and included many of the metrics in the various versions of this document.

Currently, the PP employs 63 individuals, with the majority being local community members. The local job positions with WWC are designed to last throughout the crediting period and well beyond. Many of the PP staff the verifiers interviewed and interacted with during the verification were long-term employees demonstrating sustainability of employment at WWC and established long lasting relationships. Most staff are full time employees and interviews with some staff (e.g. inventory plot, biodiversity, and social sampling teams, park rangers) informed the verifiers that the PP found alternative tasks and jobs for them to perform during slow times or during periods when their primary role was not needed.

AENOR has verified those activities though the desk review and during the on-site visit. Some of the evidence used for the desk review were the reports of the trainings /62/, payrolls or some of the policies /37-40/ /44-45/. Complementary, AENOR interviewed rangers, workers and other stakeholders to contrast the information.

Hence, AENOR deems that the benefit permanence and the measures implemented are in accordance with the validated PDD and they are reasonable and apparent to further implementation.

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

The primary method of communication and consultation with Project stakeholders and communities is through our Community Engagement and Outreach Department. They hold regular meetings with the communities and other stakeholders including schools to both disseminate Project information, and to receive and address comments, suggestions, and grievances. The efforts made by the PP to ensure local community members and affected stakeholders have access to relevant project information was found to be sufficient. All stakeholder interviews conducted by the VVB lead them to believe community members were familiar with key information regarding the project, had access to relevant project information and were given ample opportunity to provide input. Community members interviewed were generally found to be well informed about the Project.

AENOR reviewed the communication for the stakeholders in which it was explained that the process will continue with the visit of an auditor, and they could be convened to a group or personal interview. Ongoing communication and consultation with stakeholders and communities was evident throughout the verification and is primarily facilitated via the PP's community relations staff. Regular meetings are held with the local communities and affected stakeholders to provide access to pertinent information related to the project and to provide an opportunity for the communities to raise comments, suggestions and grievances. Interviewed stakeholders were found to be familiar with the PP Community Relations staff and considered to have a positive relationship. Community members also expressed a general understanding on the status of the project and that their input was listened to, and acted upon, primarily as it relates to benefit distribution and the selection of specific community-based improvement projects desired by the community.

Between both Kasigau Phase I and Kasigau Phase II, 580 meetings were held during the current monitoring period. Specifically, for the Kasigau Phase I (KCRPI), 87 meetings were held in the MP9. The average is seven meetings per month and the responsible of opening the suggestion boxes (grievances) are the community engagement and outreach department, together with a committee. The frequency of the opening of the boxes is monthly.

The VVB has reviewed the evidence provided by the PP to demonstrate the consultations and meetings performed to develop the project together with communities /59-59/ /61-63/ which also was assessed by crosschecking the information by onsite interviews with all the groups. Also, the audit team reviewed the record of the 580 meetings held in MP9 grouped by themes and months. Therefore, AENOR deems that the access to the documentation and information for all the stakeholders is correct.

4.3.6 Stakeholder Grievance Redress Procedure (G3.10)

The PP has a grievance mechanism, which was explained in the MR and assessed by evidence and onsite interviews. AENOR has reviewed the information of the grievance mechanism and contrasted with the

information of the PDD. AENOR asked the interviewees about their knowledge of the GRM and if they had knowledge of any type of complaint as well as knowledge of the process.

AENOR has reviewed the grievance evidence /60/ and deems that the information is correct and matches with the assessment of the onsite interviews and the explained on the MR. AENOR has assessed the information provided in the MR and validated PDD and crosschecked with the consultations performed during the onsite visit, and confirms all of the interviewees are aware of the existence of the grievance mechanism as well as the organigram until the closure of any complaint. The MR provides summary details on the reported grievances received during the monitoring period, which summed 10 comments submitted during community meetings and through the suggestion boxes. AENOR has reviewed the evidence provided to demonstrate the grievance received.

Therefore, AENOR´s verification team is able to confirm the grievances procedures were applied as per validated CCB-VCS-PDD and in accordance with VCS and CCB (G.3.10) requirements.

4.3.7 Worker Relations (G4.3 – G4.6)

Wildlife Works has supported the development of community-based organizations (CBOs), whose aim it is to win and manage carbon-funded activities. The CBOs are trained in grant writing and management, project management, accounting and other key skills pertinent to developing the communities in the area. The goal is for these CBOs to eventually become 100% self-sustaining. Currently, at their request, the CBOs are under the tutelage and financial support of Wildlife Works. Without carbon funding, the CBOs would not have been implemented, and Wildlife Works is proud to be able to afford the communities in the sphere of influence of the carbon Project with the capacity to manage their funds accordingly. To ensure and maintain equal opportunity hiring practices, the following process has been developed and is implemented by the Project Office:

- Wildlife Works Jobs Advertisement
- Wildlife Works Recruitment and Selection Policies
- AENOR has interviewed several people and contrasted the information with the different evidence which demonstrate the policies /37-40//44-45/. The PP has shown different job advertisement during the onsite visit, and also, the VVB asked to different workers, men and women, about the hiring process and if they suffered or knew about any type of discrimination. After the review of all this information, the VVB considers that the PP complies with the policies and the information of the MR. The VVB has reviewed the payroll, the staff and the information on the MR and confirms that the 28% of the 63 employees are women.

AENOR also asked about the costs, risks and benefits of the project in relation to the daily tasks of the employees and rest of stakeholders. AENOR gathered valuable information about the risks, considering that the conditions of the countryside in Kenya are not easy according to health, economy, and safety. The interviewees recognized that they were informed about potential risk related to their job and what measures were provided by Wildlife Works to mitigate such risks. Also, they were informed about the costs and benefits. The interviewees mentioned that thanks to the Kasigau Project, they have a better wellbeing compared to the without project scenario. AENOR has also reviewed the HR policy /45/ to crosscheck the information of the MR with the responses of stakeholders. Therefore, AENOR is able to confirm that the project developer is taking the necessary measures regarding occupational safety of workers.

Relevant laws and regulations pertaining to workers' rights are outlined in section 2.4.4 of the MR. these laws were reviewed by the VVB and compared with previous verification events to check if the laws were updated and if they suffered any modification.

Verification team is able to confirm that all activities are carried out within the framework of the project are in accordance with current regulations. AENOR did not detect incompliances with them checking the documents provided and interviewing the workers. They have been informed about risks of the works and they received training about safety matters. Therefore, the project fulfils with CCB requirements related to worker relations.

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

The PP has identified the key project personnel and management that fulfil the required technical skills and expertise to ensure the success of the project's ongoing implementation. The VVB determined that the PP has the key technical and management skills to enable project success. Relevant qualifications and professional experience are outlined for the key staff included in the MR, and many staff members the verifiers interacted with during the field audit were long-term employees of WWC. AENOR reviewed the webpage of the PP, the CV of some of the personnel, the organizational chart /1/ as well as different inspections through the onsite verification about the knowledge of the PP about the different topics. It is the opinion of AENOR, by the information of the MR and PDD and the onsite visit, that the management team can ensure that project management and carbon activities are implemented, and it is complemented by being the ninth verification event.

The PP was found to be in strong financial health, and the project's finances are supported through the sale of carbon offset credits in the voluntary carbon market. The PP's financial information is considered as commercially sensitive information, but pertinent information was made available to the verifiers during and after the verification field audit, such as financial statements and sales agreements/contracts. Based on all the assessments explained above, AENOR deems that the PP has the capacity to implement the project in accordance with the validated project description.

4.3.9 Legal Status (G5.1)

AENOR has reviewed the Laws stated in the MR to verify the compliance with the Project as well as the expiration dates if any. AENOR did not detect during the interview with local authorities or desk review incompliances related to laws and regulations.

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

The project area is privately owned by Rukinga Ranching Company, Ltd., with the majority shareholder being the Founder and CEO of WWC (the PP). Supporting deed ownership documentation was reviewed by the verifiers at the WWC HQ office during the field audit. No changes in land ownership occurred over the monitoring period. The PP has exclusive rights to the carbon offset claims generated by the project through a carbon rights agreement executed with the entity holding landownership which is expected to remain valid over for the duration of the crediting period. The process of gaining Free, Prior and Informed Consent (FPIC) by Rukinga Ranch and the project stakeholders is described in the validated PD. Interviewed stakeholders were found to be familiar with the PP Community Relations staff and considered to have a positive relationship. Community members also expressed a general understanding on the status of the project and that their input was listened to, and acted upon, primarily as it relates to benefit distribution

and the selection of specific community-based improvement projects desired by the community. All stakeholder interviews carried out during the verification found general awareness and support of the project and its activities. The audit team did not find any evidence to demonstrate that the project activities let the involuntary removal or relocation of property right holders. The audit team interviewed some people out of the project area, and they declared to be aware of the limits and the ownership of the project.

AENOR has reviewed the titles of the land /53-54/ and during the onsite visit in the WWC offices, and this information was crosschecked with the PD, previous verification reports and the information gathered from the onsite interviews. As the project area is privately owned by Rukinga Ranch Ltd, the project was found to not encroach on other private, community or government owned/managed property. The project's spatial data was compared to publicly available datasets including government owned lands such as the adjacent Tsavo National Parks, and no overlap was observed in the data. The VVB reviewed the GIS evidence /18-29/ to crosscheck the boundaries of the project. The boundaries were also assessed by GPS and the track followed during the onsite visit, in which the PP showed the limits to the VVB.

4.3.11 Identification of Illegal Activities (G5.5)

According to the information of the PP, the illegal activities that may be conducted in the Project Area include poaching of animals, both for animal products, such as elephants for their tusks, or for bush meat. Additionally, hardwood trees may be cut down for charcoal production or for building poles. Land could also be cleared for small-scale farms by members of the surrounding communities. No project benefits are derived from illegal activity. Wildlife Works has established a long and successful track record of monitoring the Project Area for any illegal activities and halting them.

The audit team has reviewed the monitoring that the PP dedicates to avoid illegal activities such as charcoal burning or poachers. The VVB interviewed some charcoal producers and they declared that they perform their activities out of the project boundaries and also that if they consider going inside of the boundaries, the rangers of Kasigau and the KWS are able to arrest them. The PP showed to the VVB the different patrols and methods of patrolling. The PP explained the possible illegal activities to the VVB. Complementary, in one of the reviews of the inventory plots, the carbon team, together with the VVB found a poacher snare, which was directly removed, identified, and notified to the HQ.

The VVB considers that the illegal activities are, sometimes performed out of the project area, and the PP is giving its best to avoid these activities from the boundaries of the project. Therefore, the PP is not obtaining any benefit from these illegal activities and the information of the MR is deemed correct.

4.4 Climate

4.4.1 Accuracy of GHG Emission Reduction and Removal Calculations

The VVB has reviewed the data and parameters from the MR (data and parameters monitored 3.1.2), and they have been crosschecked with the spreadsheet /9/ and the origin of each parameter to avoid wrong transposition.

Parameter	Assessment	Findings

$\mathcal{E}$ - The set of all burning events	N/A for the current monitoring period. The VVB has reviewed records from other periods.	N/A
a_k - Area of stratum k	Assessed by crosschecking the information of the MR with the spreadsheet /9-17/ and the GIS data /18-29/	Yes. Some findings were found. The findings were solved. See appendix 2
$a_{j,k}$ - Area of plot j in stratum k	Assessed with the plot sampling during the onsite visit and the GIS data /18-29/	N/A
a_{plot} - Area of plot j in stratum k	Assessed with the plot sampling during the onsite visit and the GIS data /18-29/	N/A
$cf_{soil,j,k}$ - Carbon fraction of soil sample j in plot in stratum k	Assessed with the spreadsheet /9-17/ and crosschecked with the corresponding SOP	N/A
$\mathrm{dbh}_{\mathrm{i,j,k}}$ - Diameter at breast height (DBH) of the ith tree in plot j in stratum k	Assessed with direct measurements, crosschecking the inventory data and raw data	N/A
$\mathrm{h}_{\mathrm{i,j,k}}$ - Height of the ith tree in plot j in stratum k	Assessed with direct measurements, crosschecking the inventory data and raw data	N/A
ν - Shrub size class per species.	Assessed with direct measurements, crosschecking the inventory data and raw data	N/A
$\mathrm{m}_{\mathrm{dry,j,k}}$ - Dry mass of non-tree sample harvested from clip plots in plot j, stratum k	Crosschecked with the spreadsheet data /9-17/	N/A
$\mathrm{r}_{\mathrm{BASE,i,j,k}}$ - Base radius of the ith standing dead, decay class II tree in plot j in stratum k.	Assessed with onsite visit and raw data /9/	N/A
$\mathrm{r}_{\mathrm{TOP,i,j,k}}$ - Top radius of the ith standing dead, decay class II tree in plot j in stratum k.	Assessed with onsite visit and raw data /9/	N/A

$v_{i,j,k}$ - Volume of the ith standing dead, decay class II tree in plot j in stratum k.	Assessed with onsite visit and raw data /9/	N/A
$y_{INTACT,j,k}$ - Carbon stock in standing dead trees in decay class I, plot j, stratum k.	Assessed with onsite visit and raw data /9/	N/A
$y_{DECAYED,j,k}$ - Carbon stock in standing dead trees in decay class II, plot j, stratum k.	Crosschecked with the spreadsheet data /9-17/	N/A
$y_{j,k}$ - Attribute of plot j, stratum k	Crosschecked with the spreadsheet data /9-17/	N/A
y_k - Attribute of stratum k	Crosschecked with the spreadsheet data /9-17/	N/A
ρ_{mesoil} - Mass-equivalent bulk density of fine portion pf soil sample	Crosschecked with the spreadsheet data /9-17/	N/A
$C_{AGLT}^{[m]}$ - Estimated carbon stock in above-ground large trees at monitoring period [m]	Crosschecked with the spreadsheet data /9-17/	N/A
$C_{AGNT}^{[m]}$ - Estimated carbon stock in above-ground non-tree biomass at monitoring period [m].	Crosschecked with the spreadsheet data /9-17/	N/A
$C_{AGST}^{[m]}$ - Estimated carbon stock in above-ground small tree biomass at monitoring period [m].	N/A	N/A
$C_{BGLT}^{[m]}$ - Estimated carbon stock in below-ground large tree biomass at monitoring period [m].	Crosschecked with the spreadsheet data /9-17/	N/A

$C_{BGNT}^{[m]}$ - Estimated carbon stock in below-ground non-tree biomass at monitoring period [m].	Crosschecked with the spreadsheet data /9-17/	N/A
$C_{BGST}^{[m]}$- Estimated carbon stock in below-ground small tree biomass at monitoring period [m].	N/A	N/A
$C_{SDW}^{[m]}$ - Estimated carbon stock in standing dead wood at monitoring period [m].	Crosschecked with the spreadsheet data /9-17/	N/A
$C_{LDW}^{[m]}$- Estimated carbon stock in lying dead wood at monitoring period [m].	N/A	N/A
$C_{SOIL}^{[m]}$ - Estimated carbon stock in soil carbon at monitoring period [m].	Crosschecked with the spreadsheet data /9-17/	Yes. Some findings were found. The findings were solved. See appendix 2
$C_{Total}^{[m]}$ - Estimated carbon stock in the Project Area at monitoring period [m].	Crosschecked with the spreadsheet data /9-17/	N/A
$C_{BE}^{[m]}$ - Estimated baseline emissions	Crosschecked with the spreadsheet data /9-17/	N/A
$\bar{C}$ - Estimated mean carbon stock in the Project Area	Crosschecked with the spreadsheet data /9-17/	N/A
$C_{LE}^{[m]}$ - Estimated emissions from leakage	Crosschecked with the spreadsheet data /9-17/. The PP has determined that for the Current MP, there was no leakage because of project implementation. Leakage quantification is based on the judgement of inventory teams and their assignment of a leakage factor representing forest degradation observed on the leakage plots.	N/A

	This is then compared to the cumulative leakage model, and leakage is calculated using equation 32 of the methodology. The audit team reviewed the supporting leakage data provided and visited several leakage plots during the visit which were contrasted with the leakage spreadsheet /12-13/ and complementary, the audit team confirmed that the monitoring team followed the SOPs for the leakage measurement. Thus, the audit team considers that the PP has done a correct estimation of the leakage emissions.	
$C_{PE}^{[m]}$ - Estimated project emissions	Crosschecked with the spreadsheet data /9-17/. The PP has stated that project emissions are considered zero during this MP because there were no disturbances in Kasigau Phase I that met the definition of project emission according to the Methodology VM0009. Forest Fires are not frequent in Kasigau and in the case some forest fire is produced, the Kasigau team has a solid team and a good plan to prevent or control these forest fires. Therefore, the low size and frequency of these natural disasters make the PP considers project emissions as minimis. The occurrence of forest fires is monitored and also, the PP has several plots to monitor the occurrence of forest fires. The audit team has reviewed the monitoring plan and visited some fire plots to verify that the project proponent inventoried all forest fires that have occurred in several years. The audit team during the onsite visit, visited several places and did not find any forest fire or burning of woody biomass within the limits of the project that could be considered as a project emission. The PP has shown the fire events database to the auditors, and it was confirmed through satellite imagery and several questions to some stakeholders or project participants.	N/A
$C_{U}^{[m]}$ - Confidence deduction	Crosschecked with the spreadsheet data /9-17/	N/A

$C^{[m]}$ - Quantified emissions reductions and/or removals	Crosschecked with the spreadsheet data /9-17/	N/A
$\hat{\sigma}_{SE,AGLT}$ - Estimated standard error of carbon stocks in above-ground large trees at monitoring period [m]	Crosschecked with the spreadsheet data /9-17/	N/A
$\hat{\sigma}_{SE,AGNT}$ - Estimated standard error of carbon stocks in above-ground non-trees at monitoring period [m]	Crosschecked with the spreadsheet data /9-17/	N/A
$\hat{\sigma}_{SE,AGST}$ - Estimated standard error of carbon stocks in above-ground small trees at monitoring period [m]	Crosschecked with the spreadsheet data /9-17/	N/A
$\hat{\sigma}_{SE,BGLT}$ - Estimated standard error of carbon stocks in below-ground large trees at monitoring period [m]	Crosschecked with the spreadsheet data /9-17/	N/A
$\hat{\sigma}_{SE,BGNT}$ - Estimated standard error of carbon stocks in below-ground non-trees at monitoring period [m].	Crosschecked with the spreadsheet data /9-17/	N/A
$\hat{\sigma}_{SE,BGST}$ - Estimated standard error of carbon stocks in below-ground small trees at monitoring period [m]	Crosschecked with the spreadsheet data /9-17/	N/A
$\hat{\sigma}_{k}$ - Estimated standard deviation of carbon stocks in stratum k.	Crosschecked with the spreadsheet data /9-17/	N/A
$\hat{\sigma}_{SE,LDW}$ - Estimated standard error of carbon stocks in lying dead wood at monitoring period [m]	Crosschecked with the spreadsheet data /9-17/	N/A

$\hat{\sigma}_{SE,SDW}$ - Estimated standard error of carbon stocks in standing dead wood at monitoring period [m].	Crosschecked with the spreadsheet data /9-17/	N/A
$\hat{\sigma}_{SE,SOIL}$ - Estimated standard error of carbon stocks in soil carbon at monitoring period [m].	Crosschecked with the spreadsheet data /9-17/	N/A
$\hat{\sigma}_{SE,Total}$ - Estimated standard error of total carbon stocks in the Project Area at monitoring period [m]	Crosschecked with the spreadsheet data /9-17/	N/A
$\hat{\sigma}_{\bar{C}}$ - Estimated standard deviation of carbon stocks in project area.	Crosschecked with the spreadsheet data /9-17/	N/A
cf_{dw} - Carbon fraction of dry matter for dead wood	Crosschecked with the spreadsheet data /9-17/	N/A
$cf_{soil,j,k}$ - Carbon fraction of soil sample in plot j in stratum k	Crosschecked with the spreadsheet data /9-17/	N/A
c_k - Relative cost of making an observation in stratum k.	N/A	N/A
$\bar{E}$ - Result of cross-validation of newly developed allometric equations.	N/A	N/A
$\hat{e}_i$ - Estimated cross-validated residual for observation i.	N/A	N/A
$f_{-i}(\cdot)$ - Allometric function re-fit without observation i	N/A	N/A
$G(t,\lambda)$ - Proportion of soil lost at time t with decay parameter λ	Crosschecked with the spreadsheet data /9-17/	N/A

F_{DF} - Proportion of cumulative deforestation	Crosschecked with the spreadsheet data /9-17/	N/A
F_{LE} - Proportion cumulative deforestation and degradation predicted by the leakage model.	Crosschecked with the spreadsheet data /9-17/	Yes. Some findings were found. The findings were solved. See appendix 2
$\hat{r}_{LE}^{[m]}$ - The estimated leakage factor as a proportion of baseline emissions	Crosschecked with the spreadsheet data /9-17/	N/A
l_j - Length of transect j used for measuring lying dead wood.	N/A	N/A
$m_{burned,i}$ - The mass of wood burned during the ith event	N/A	N/A
$\hat{m}_{DF}$ - The estimated sample size in the space of the reference area given the pilot sample data	Crosschecked with the spreadsheet data /9-17/	N/A
$m_{soil,j,k}$ - Dry mass of soil sample taken from plot j in stratum k.	Crosschecked with the spreadsheet data /9-17/	N/A
$m_{rf,j,k}$- Dry mass of rock fraction of soil sample in plot j in stratum k	N/A	N/A
$m_{dry,subsample}$ - Dry mass of subsample of non-tree biomass collected to estimate dry:wet ratio	N/A	N/A
$m_{wet,j,k}$ - Wet mass of non-tree sample harvested from clip plots in plot j, stratum k	N/A	N/A

$m_{wet,subsample}$ - Wet mass of subsample of non-tree biomass collected to estimate dry:wet ratio	N/A	N/A
$\hat{n}_k$ - Estimated total number of plots required in stratum k.	Crosschecked with the spreadsheet data /9-17/	N/A
N_P - Total number of possible plots in Project Area	Crosschecked with the spreadsheet data /9-17/ and GIS /18-29/	N/A
$N_{P,k}$ - Total number of possible plots in stratum k.	Crosschecked with the spreadsheet data /9-17/ and GIS /18-29/	Yes. Some findings were found. The findings were solved. See appendix 2
$\hat{n}_{total}$ - Estimated total number of plots required.	Crosschecked with the spreadsheet data /9-17/	N/A
$o_i^{[m]}$ - State observation for the ith sample point during monitoring period [m].	Crosschecked with the spreadsheet data /9-17/	N/A
$\bar{o}^{[m]}$ - Average of state observation for the ith sample point during monitoring period [m].	Crosschecked with the spreadsheet data /9-17/	Yes. Some findings were found. The findings were solved. See appendix 2
$P(t_i)$ - Probability of making an observation at time t_i	Crosschecked with the spreadsheet data /9-17/	N/A
$P(t_i, x_i, y_i)$ - Probability of observing a sample point in the reference area located at (x_i,y_i) at time t_i	Crosschecked with the spreadsheet data /9-17/	N/A
$P(x_i, y_i \mid t_i)$ - probability of observing location (x_i,y_i) given on observation is made at time t_i	Crosschecked with the spreadsheet data /9-17/	N/A

t_i - The time of the ith sample point	Crosschecked with the spreadsheet data /9-17/	N/A
$U^{[m]}$ - Average uncertainty in carbon stocks and the baseline model	Crosschecked with the spreadsheet data /9-17/	N/A
U_{SCL} - Estimated uncertainty in the soil carbon loss model.	Crosschecked with the spreadsheet data /9-17/	N/A
U_{DF} - Estimated uncertainty in the cumulative deforestation model	Crosschecked with the spreadsheet data /9-17/	N/A
$U_{TOTAL}^{[m]}$- Estimated uncertainty of total carbon stocks	Crosschecked with the spreadsheet data /9-17/	N/A
$v_{soil,j,k}$ - Total volume of soil sample in plot j in stratum k	Crosschecked with the spreadsheet data /9-17/	N/A
$v_{rf,j,k}$ - Volume rock fragments (> 2mm) in soil sample taken in plot j in stratum k	N/A	N/A
w_i -The weight applied to the ith sample point	Crosschecked with the spreadsheet data /9-17/	N/A
$w_i^{[m]}$ - The weight of the ith sample point during monitoring period [m]	Crosschecked with the spreadsheet data /9-17/	N/A
w_k - Proportion of plots allocated to stratum k.	Crosschecked with the spreadsheet data /9-17/	N/A
x - Vector of observed covariates to deforestation	Crosschecked with the spreadsheet data /9-17/	N/A
o - Vector of observed forest states	Crosschecked with the spreadsheet data /9-17/	N/A

$x^{[m]}$ - Covariate values	Crosschecked with the spreadsheet data /9-17/	N/A

Regarding the accuracy of the GHG emissions data, the VVB has reviewed the different spreadsheet which support the calculation. the VVB has reviewed the formulae, conversions and default values. Also, has compared this monitoring event with previous verifications to check the consistency of the data and parameters. The audit team has compared the parameters with other sources when it was relevant, such as the GIS data, raw data or leakage data.

Complementary, the audit team has carried out some meetings with the PP to analyse the spreadsheets and calculations for the Kasigau project, as well as the representation of some satellite images or misunderstandings. During the onsite visit, also the VVB has reviewed onsite the excel and parameters and the PP explained the obtention of the data, which was directly crosschecked with the methodology, the MR and other documentation.

In conclusion, the project achieved a net GHG emission reductions of 225,194 tCO2e during the current monitoring period. Finally, VCUs are calculated by removing the buffer credits. The non-permanence risk rating for this project is 13%. Therefore, during this monitoring period (01/01/2022-31/12/2022), the project generated 195,918 VCUs for issuance and 29,276 buffer credits.

AENOR reproduced the calculations to achieve the same results and deems they are depicted clearly and correctly in the provided sheets. AENOR verification team was able to trace them directly from the data sources. Formulae used are in compliance with monitoring plan, PDD, and methodology, as well as the default values used to determine the parameters. Thus, the net amount of VCUs to be issued is accurate and realistic. Assumptions used by PP at verification were appropriately cross-checked and assessed with requested evidence.

In order to calculate the above terms, the MR details the data and parameters used during the verification process. For each of them, AENOR checked its accuracy, consistency, and reliability by reproducing the spreadsheets calculations, verifying the correctness of formulae and methods used and crosschecking the data values with sources.

AENOR verified the consistency and accuracy of each parameter of the MR by crosschecking the information with the information of the PDD as well as checking values and reproducing the calculations in the calculation spreadsheets (section 2.3 in this report) and did not find inconsistencies between them after the closing of CARs and CLs requested. Therefore, AENOR deems that values reported for the parameters are accurate and consistent. Information was deemed accurate and consistent taking into account sources used. AENOR deems the parameters monitored and available at validation are correct, reliable and consistent. Information in the MR is in compliance with the PDD, the calculations provided and the applicable methodology. Then, the results showed in the MR are reliable, consistent and accurate. Procedures for quantifying the baseline emissions were conducted in accordance with the methodology.

4.4.2 Quality of Evidence to Determine GHG Emission Reductions and Removals

Data and parameters used to determine the GHG emission reductions achieved as a result of the project activities over the monitoring periods are provided in section 3 of the MR, with relevant details included.

The VVB concluded that all the relevant parameters are included and addressed through implementation of the project's monitoring plan in accordance with the validated project description and applied methodology. All the relevant parameters associated with the final emission reduction figures were found to be identifiable and traceable to the relevant source data in the supporting carbon quantification workbooks provided to the VVB.

The audit team sampled 11 biomass inventory plots, 1 leakage plot and 2 fire plots across different forest strata. The results of the sampling were compared with the raw data and the VVB deems that the values from the monitoring and the sampling are the same, therefore, the measurements are considered correct.

The PP demonstrated to have applied the standardized data collection and processing procedures. Several QA/QC (Quality assurance and quality control) procedures are in place, including regular training of quantifiers, staff internal revisions, multiple quantifications, etc.

In the event that the quantified NERs for any monitoring period are negative as a result of carbon stock losses, the project proponent must follow the VCS procedures for reversals as set out in the latest version of the VCS. During the current MP as well as the whole project lifetime, no reversals have occurred. For the assessment of these reversals, the audit team has reviewed the spreadsheet for the calculations /9/ and checked that the difference between the current total to-date net GHG benefit of the project, compared to the total to-date net GHG benefit of the project or program at the previous verification event is not negative. Complementary, the audit team can confirm that during the visit, they were not able to observe any natural phenomenon considered as a reversal. Therefore, the audit team considers that the PP has correctly identified that no reversals occurred during this MP9.

AENOR has verified that the monitoring plan is being implemented as the described in the PDD. AENOR checked that key workers are fully involved in monitoring events (training, measuring, archiving, reporting, quality control, etc.). QA/QC procedures are considered strict at identifying, reviewing, and handling inconsistencies found in order to improve the management of the project. AENOR carried out a cross check of the information of a sample of plots, amongst the data collected onsite and the captured information for inventory calculations and no inconsistencies were found. AENOR has also reviewed the QA/QC examples for this MP /16/ /35/ and compared with the SOPs and the real data from the plot sampling.

Roles and responsibilities along with data management and archival system are also detailed in the MR and other supported documents. Interviews with the project staff and inspection of data and results demonstrated that the PP possesses competencies required for reporting of GHG emissions removals accurately.

Data presented to the audit team were clear and coherent and processing steps could be traced to the corresponding sections of the methodology and monitoring plan with transparency.

4.4.3 Non-Permanence Risk Analysis

The project utilized the non-permanence risk analysis tool (AFOLU Non-Permanence Risk Tool 4.0) to assess risk according to internal risk, external risk, natural risk, and mitigation measures for minimizing risk. The audit team reviewed the Non-Permanence Risk Report following VCS Standard and confirmed that the project adheres to the requirements set out in the VCS AFOLU Non-Permanence Risk Tool.

At all levels, the audit team evaluated the rationale, appropriateness, and justifications of risk ratings chosen by the PP. Each risk factor was thoroughly assessed for conformance. A brief review of each factor is shown in the table below.

Risk factor	Risk Rating	Assessment
Internal Risks		
Project Management: (assessed using table 1 of the VCS AFOLU Risk Tool)-	-2 (total may be less than zero) In AENOR´s opinion, total project management risk rating (-2) is properly justified and in accordance with the AFOLU Non-Permanence Risk Tool: VCS V4.0.	a) Not applicable. GHG credits are not based on planted species. Moreover, no GHG credits have previously been issued. Not applicable = 0 b) Wildlife Works has ongoing enforcement of forest protection for 100% of the stocks Risk Rating = 2 is justified c) The management team does include individuals with significant experience in all skills necessary to successfully undertake all project activities. AENOR has reviewed the CV of the personnel involved in the Kasigau project Risk rating = 0 is justified d) The management team does maintain a presence in the country, they are based within the project area. AENOR has visited the WWs headquarters in the project area. Risk rating = 0 is justified e) Management team includes individuals with significant experience in AFOLU project design and implementation, carbon accounting and reporting under the VCS Program. AENOR has reviewed WWs webpage and deems that the information is correct Risk rating= -2 is justified. f) Wildlife Works has implemented an elaborate adaptive management plan including a community feedback mechanism that is considered leading edge within the REDD community. AENOR has reviewed the plan and asked to the communities about this information. Also, information was contrasted with previous MRs. Risk rating = -2
Financial viability (assessed using table 2 of the VCS AFOLU Risk Tool).	0 (total may not be less than zero) In AENOR´s opinion, total financial viability risk rating (0) is properly justified and in accordance with	a) – c) N/A d) Project reached breakeven at the end of the first full year based on up front investment by Wildlife Works and market sales of Carbon credits. AENOR has reviewed the cashflow during the onsite visit Risk Rating = 0 is justified e) -g) N/A h) See above.

Risk factor	Risk Rating	Assessment
	the AFOLU Non-Permanence Risk Tool: VCS v4.0.	Risk rating = 0 is justified j) Project has available as callable financial resources at least 50% of total cash out before project reaches breakeven. Not applicable = 0
Opportunity Cost (assessed using table 3 of the VCS AFOLU Risk Tool).	-2 (total may be less than zero) Then, in AENOR´s opinion, total opportunity cost risk rating (-2) is properly justified and in accordance with the AFOLU Non-Permanence Risk Tool, v4.0.	a) – c) See below. Not applicable = 0 d), Baseline activities are subsistence-driven, and the project generates net positive impacts in the well-being of the communities. AENOR has reviewed section of the PDD and MR and crosschecked with information from the onsite visit. Risk rating = 0 is justified e) – g) See above. Not applicable = 0 h) all ranches are under Carbon Rights Agreements covering entire crediting period. AENOR has reviewed the agreements. Copies of the carbon rights agreements were reviewed by the verifiers at the WWC HQ office during the field audit, and it was confirmed that the agreements cover the entire crediting period. The agreements were also sent to the VVB to review remotely. Risk rating= -2 is justified i) Not applicable = 0
Project Longevity (assessed using table 4 of the VCS AFOLU Risk Tool).	15 (total may not be less than zero) 15 (total may not be less than zero) In AENOR´s opinion, Total Project Longevity (30 years) is properly justified and in accordance with the AFOLU Non-Permanence Risk Tool, v4.0.	a) See below. Not applicable = 0 b) The project longevity is assumed to be 30 years. AENOR has reviewed the PDD and the agreements evidence. Risk rating = 15 is justified.
Total internal risk = 11 (total may not be less than zero)		
External Risks		

Risk factor	Risk Rating	Assessment
Land Tenure and resources access/impact (assessed using table 6 of the Risk Tool).	0 (total may not be less than zero) 0 (total may not be less than zero) in AENOR´s opinion, total land tenure (0) is properly justified and in accordance with the AFOLU Non-Permanence Risk Tool, v4.0	a) See below. Not applicable = 0. b) Land ownership is held by the Group Ranch Companies, however the resource rights have been transferred from the Group Ranch Companies to Wildlife Works Carbon through conservation easements. AENOR has reviewed the agreements with the government /53-54/ Risk rating = 2 is justified c) - e) Not applicable = 0 f) The project area is protected by legally binding commitment to continue management practices that protect the credited carbon stocks over the length of the project crediting period. AENOR has reviewed the agreements and deems the information is correct. Risk rating= -2 is justified g) No disputes over land tenure, ownership or access/use rights exist. Not applicable = 0
Community engagement (assessed using table 7 of the Risk Tool).	-5 (total may be less than zero) -5 (total may be less than zero) in AENOR´s opinion, total community engagement (-5) is properly justified and in accordance with the AFOLU Non-Permanence Risk Tool, v4.0.	a) – b) Not applicable = 0. c) The project generates net positive impacts on the well-being of the communities. Risk rating= -5 is justified.
Political Risks (assessed using table 8 of the Risk Tool).	2 (total may not be less than zero) in AENOR´s opinion, total political risk (2) is properly justified and in accordance with the AFOLU Non-Permanence Risk Tool, v4.0.	a) Not applicable = 0 b) The governance score of Kenya is -0.551. The VVB has reviewed the WB indicators and confirms that the information is correct. risk rating = 4 is justified d)-e) See above. Not applicable = 0 f) Kenya is implementing REDD+ under FCPF. Risk rating = -2 is justified.

Risk factor	Risk Rating	Assessment
Total external risks = 0 (Total may not be less than zero)		
Natural risks		
Fire Risk (assessed using table 10 of the Risk Tool).	LS*M=2	Less than every 10 years (Four times in 15 years). AENOR has reviewed the natural risk analysis /57/. During the onsite visit, the VVB has reviewed contrasted the information of the MR.
Pest and disease outbreaks (assessed using table 10 of the Risk tool).	LS*M=0	Less than every 10 years (Four times in 15 years). AENOR has reviewed the natural risk analysis /57/. During the onsite visit, the VVB has reviewed contrasted the information of the MR.
Extreme weather (assessed using table 10 of the Risk tool).	LS*M=0	Less than every 10 years (Four times in 15 years). AENOR has reviewed the natural risk analysis /57/. During the onsite visit, the VVB has reviewed contrasted the information of the MR.
Geological risks (assessed using table 10 of the Risk Tool).	LS*M=0	Less than every 10 years (Four times in 15 years). AENOR has reviewed the natural risk analysis /57/. During the onsite visit, the VVB has reviewed contrasted the information of the MR.
Total natural risks = 2		
OVERALL RISK RATING = 11+0+2 = 13%. Then an overall risk rating of 13% is considered.		

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

Section 4.3.3 of the MR refers to the dissemination of the monitoring plan and the results. The results from monitoring plan implementation are disseminated to the communities either through community meetings or barazas or during the SIA community workshops.

The audit team asked to the workers, communities and other stakeholders about the dissemination of the documentation. All of the interviewees declared to receive the documentation and they were aware of the results of the monitoring plan. The interviewees highlighted the community meetings in which they are aware of all the information as well as they are able to provide some comments. Complementary, the PP has provided the attendance lists and minutes of some of the community meetings to check further information.

Therefore, AENOR considers that the dissemination of the monitoring plan and its results are done correctly.

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

The PP has explained in section 3.3 the consequences of the climate change and some activities implemented to mitigate the negative effects. Some of the strategies implemented to assist communities or biodiversity are:

- *Construction of boreholes*: the audit team has identified several new and old constructions of boreholes and waterholes for people and biodiversity. Also, during the interviews to

different community members, AENOR asked about some of the infrastructure construction, and the interviewees answered among other buildings, the waterholes.

- *Drought-resistant trees*: the VVB has reviewed the tree nursery, in which thousands of seeds are cultivated and later, they are given to the communities to be planted in their farms or gardens. These species are drought resistant. The process of the tree nursery is similar to a cycle. First, the PP gives the seeds to the communities, they grow up the seedlings, and after one or two years, the communities sell the plant to the nursery. After the nursery step, everyone can gather trees to plant wherever they want.

- *Water storage*: AENOR has visited the water storage close to the WWs HQ during the onsite visit.

Therefore, AENOR considers that the PP is properly implementing activities to fight and adapt to the negative effects of climate change.

4.5 Community

4.5.1 Community Impacts (CM1.1)

Wildlife Works applies the cause-and-effect logic (causal model) and associated theories of change. Since they are based on several assumptions about the cause-and-effect relationships, carefully selected indicators are needed to monitor these assumptions in a causal chain analysis. Wildlife Works holds Social and Biodiversity Impact Assessment (SBIA) community workshops to engage the community in thinking about the key issues they can benefit from the project, how things would have been without the project, how they may be with the Project, and any potential risks and / or negative impacts.

The following five Focal Issues were identified by the communities during the initial workshop as the key issues facing the community that the project could help with: (i) Governance: incorporating leadership and gender inclusivity; (ii) Poverty: jobs and income-generating activities; (iii) Human-wildlife conflict; (iv) Environmental degradation: including deforestation and agricultural issues; and (v) Education. The last SBIA was carried out in 2021.

In general, the Project has provided positive impacts through increased access to education, improved access to drinking water, agricultural training and alternative income sources. Specific results from the implementation of community-based project activities are reported in the MR. These outcomes were found to be aligned with the community monitoring plan the reported results demonstrate the plan was properly implemented and that the project is achieving the desired outcomes established in the validated project design. The Project also had several unplanned impacts on communities in the Project Area. The PP has dealt with them properly according to the information of section 4.1.1 of the MR and the information gathered through the project visit. For example, the increase of popularity of the project has led to an increase in the tourism of the PA as well as some NGOs and other associations have felt attracted by the project and its community´s people. The increase in the people´s wealth has been helped with some courses about finances and money management to prevent the lack of financial knowledge.

The audit team has reviewed the focal issues and the activities implemented to mitigate negative impacts. AENOR has performed direct interviews with related stakeholders and asked them about these activities. All of the interviewees recognized to be aware of the last SBIA as well as recognized that the activities

described in the MR are currently being implemented as part of the community well-being process. Interviews with stakeholders and affected community members also demonstrated the project's achievements of positive community benefits, which were universally considered positive by those individuals and groups interviewed. The Audit team considers that the unplanned impacts are correctly addressed by the PP and in any case, all the impacts have been converted into positive impacts.

The PP has provided to AENOR the summary information about the SBIA to crosscheck the last information with the reported on the MR. This information was also contrasted with the testimonies of the stakeholder interviewed during the onsite visit, and AENOR confirms that the information reported is reliable and correct.

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

AENOR reviewed evidence, both onsite and remotely, to confirm that the information assessed and stated in section 4.1.2 of the MR is reliable and correct. AENOR observed the water-holes as well as the new educational infrastructure within the project boundaries, in which there were signs of the Wildlife Works implementation. AENOR also observed the greenhouse business and interviewed workers (men and women from the nursery) as well as visited the Hadithi shop, which is a business which supports communities by selling handcrafts. AENOR interviewed the ranger´s team and observed the different methods to monitor conflicts. Interviews with stakeholders and affected community members also demonstrated the project's achievements of positive community benefits, which were universally considered positive by those individuals and groups interviewed.

Therefore, with all the observations made by the VVB during the onsite visit, the interviews and the remotely review of some evidence, AENOR considers that the net impact of project activities on community groups is positive.

4.5.3 Protection of High Conservation Values (CM1.2)

The PP has identified the Mount Kasigau ecosystem as the main HCV of the KCRPI because of the number of ecological services it provides to the communities. Several actions are developed to protect and improve the environment and the landscape of this ecosystem.

AENOR asked to the communities about the importance of this ecosystem into the communities. They declared that the Mount Kasigau is a fount of biodiversity and water resources. Therefore, they are very thankful to the Kasigau Mountain. Some activities performed to protect the Kasigau Mountain are the reforestation with seedlings provided by the Kasigau nursery. As explained above, the trees are grown by the communities, and later these trees are sent to the greenhouse to be shared later with all the communities interested in reforesting the local ecosystems. Therefore, AENOR considers that the HCV identified is being protected and improved.

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

According to the MR and the PP information, there are no net negative impacts on offsite stakeholders as a result of KCRPI because there was no legal harvest of forest resources or wildlife from the Project Area. On the other hand, all the impacts in offsite stakeholders, are positive.

The VVB understand that the lands that make up the project area are privately owned and as such, offsite stakeholders were never legally allowed to utilize the natural resources found in the project area, so that

the protection and preservation of the project area is not resulting in a negative impact to offsite stakeholders. AENOR interviewed several stakeholders and all of them recognized that the project has physical boundaries although the benefits of the project are resulted also out of the project. Therefore, all the impacts caused by the project are positive, and offsite stakeholder and external communities can be benefited from these activities. Therefore, the net impacts of project activities on the well-being of other stakeholders re not negative.

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

The community monitoring plan was developed following the SBIA processes. From the theory of change process, appropriate indicators were developed from the community workshop and reviewed and revised into a final list of indicators for KCRPI. The MR also shows details and results for M9 for the indicators identified during the community SIA.

As described above, all project activities provide positive impacts broadly to the general community, as all were designed to impact the entire household. Furthermore, human-wildlife conflict in the project area can cause major loss of crops, and therefore income, damage to property and serious injury or death, all negatively impacting household income. The construction of boreholes, implementation of wildlife deterrents, and patrolling all seek to reduce human/wildlife conflict. Jobs and other income generating activities also likewise seek to increase household income and therefore positively impact all members of the household and community.

AENOR has reviewed the community monitoring plan and has identified the following focal issues and direct results of each focal issue:

- Human-wildlife conflicts
    - Adequate vegetation and water
    - Reduced encroachment and poaching
    - Better wildlife containment
- Education
    - Increased enrolment
    - Better education infrastructure
- Environmental degradation
    - Increased tree cover in landscape
    - Improved forest quality and cover
- Governance
    - Good leadership
- Poverty
    - Diversified livelihoods and food security
    - Increased and stable income

Some of the results from the community monitoring plan are the following:

- Wildlife Works retains a workforce of 58 at KCRPI on average of the last three years. At the end of 2022 (the M9 reporting period), there were 63 employees in total. AENOR has reviewed the payroll and the staff of the project during the onsite visit.
- A total of 7 Projects were commissioned during the reporting period in Phase I. AENOR has visited some of the bursaries, and also asked to some stakeholders and beneficiaries about these projects. All of the interviewed recognized that these buildings are a positive benefit for the communities, and they expect the creation of new infrastructure soon. The VVB has reviewed the location of these infrastructures with direct GPS position during the onsite visit and confirms that the information is correct.
- Other business activities: there are other business which provide employment and wellbeing services to several stakeholders and communities. AENOR has visited some of these businesses such as the Wildlife Works Greenhouse, the seedling purchase program, the ecotourism facilities, some health projects etc. Complementary, AENOR has reviewed evidence to demonstrate other beneficial activities, such as the Wildlife Works Eco-Charcoal Production Facility /51/ or several trainings /62/

All these impacts were positive, and there were no negative impacts. Hence, the net impact of the project on all the above has been assessed to be positive. The frequency of monitoring is detailed in section 4.3.2 of the MR as well as the results of these observations.

Verification team assessed the evidence provided such as the community awareness meetings /62/, the livelihoods report /61/ and the SBIA of 2021 /59/. Complementary, through the onsite visit, the audit team assessed through interviews the implementation of the monitoring activities with the different stakeholders and activities. AENOR confirms that community monitoring plan is implemented as per validated CCB-VCS-PDD. AENOR also confirms that the dates, frequency and sampling methods are in accordance with the validated PDD.

4.5.6 Community Monitoring Plan Dissemination (CM3.3)

AENOR confirmed during the on-site visit by interviewing local stakeholders the awareness about the results of the projects, its implementation and monitoring. Verification team reviewed the evidence provided by the PP such as SBIA summaries and minutes /59/. AENOR has also seen during the onsite visit the different methods to share information within the project area, such as bulletin boards. AENOR has also reviewed that the MRs are uploaded into the Verra webpage and asked to the stakeholders for the access to the webpage as well as the understanding of the documentation in English. The interviewees recognized that the access to the Verra registry is very easy, and they can gather the documentation both in English and Swahili. Also, they can ask to the leaders of the project to obtain the documentation directly. In opinion of AENOR the results of community monitoring were disseminated in accordance with the validated CCB-VCS-PDD.

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

This section is not applicable.

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

This section is not applicable.

4.6 Biodiversity

4.6.1 Biodiversity Changes (B1.1)

Section 5.1.1 describes the biodiversity changes and improvement in focal issues such as: safeguarding HCV species; protecting the habitat including Mt. Kasigau; Reducing human-wildlife conflicts and corridor maintenance. Similar to the community section above, Wildlife Works applies a similar cause-and-effect logic when measuring and monitoring impacts of KCRPI on biodiversity. A theory of change is a hypothesis about how a project intends to achieve its intended objectives.

For KCRPI, the baseline scenario is mainly deforestation due to unplanned agricultural expansion by subsistence farmers. This is normally preceded by charcoal production and pole harvesting which are the major causes of forest degradation. Other activities in the Project Area included overgrazing and low-level ecotourism ventures. Under this “without-project scenario”, biodiversity (both flora and fauna) would be adversely affected through reduced habitat quality, poaching or other forms of disturbance and persecution.

Biodiversity protection is one of the basic pillars of the project, and the country visit has been very fruitful in verifying this information. KCRPI has a very good density of animals, and the proponent puts the necessary measures in place to care for and improve the wildlife populations. During the visit the audit team was able to see a large number of animals, such as elephants, buffaloes, zebras, impalas, oryx, elands, baboons, dik-dik, gerenuks, etc. The audit team has compared the information of the current populations with old records as well as baseline data in terms of biodiversity, and therefore it is demonstrated that the changes of the project in terms of biodiversity are positive.

During the onsite visit, the audit team visited the whole area of the project, because the monitoring plots were distributed along the area. Therefore, the audit team was able to see the whole ecosystem of the project area, the different stratums and typical forests.

Therefore, verification team confirmed that the project’s assessment of changes in biodiversity resulting from project activities in the project zone during the monitoring period are accurate.

4.6.2 High Conservation Values Protected (B1.2)

The audit team has reviewed the activities described to improve the HCVs and considers that the HCVs will be positively affected in any case. Activities such as improving patrolling, creating wells or dams will result in benefits for wildlife and HCVs. The audit team during the onsite visit was able to confirm that the information stated in section 5.1.2 and along the whole biodiversity section is correct. Therefore, verification team concludes that the mitigation actions taken are appropriate and in accordance with validated project description. The people adjacent to the biodiversity conservancy are fully informed and are aware about these values of conservation and all of them have been sensitized on these mitigation activities to avoid negative effects.

4.6.3 Invasive Species (B1.3)

No non-native species were used anywhere in the Project Accounting Area during the M9 reporting period. The audit team has reviewed the list of trees used in the greenhouse to distribute among communities, and all of them are native.

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

No non-native species were used anywhere in the Project Accounting Area during the M9 reporting period. However, the PP has provided the list of possible adverse effects of the usage of different species as well as the justification of its use. For example, the Jojoba is used because of its resistance to arid conditions as well as not being palatable to elephants. Complementary, it has been demonstrated that seed are not easily dispersed due to the big size of them. For the fruit trees such as mangos, passion fruits and cashews, they are adapted to drylands and they have been used for many years in the region. Therefore, the impacts are nil.

4.6.5 GMO Exclusion (B1.5)

Not applicable since no GMOs were used to generate GHG reductions or removals.

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

According to the MR, the main negative effect outside the project area is poaching and human-wildlife conflicts due to population increase outside the project. However, the PP has identified three reasons to avoid or reduce these negative effects. The area acts as a corridor between national parks, so naturally, the area outside the project area would already have abundant biodiversity. There are ranches outside the project area prior to the implementation of KCRPI, so they would not be affected. Finally, to reduce conflicts, the project is developing a number of activities to reduce these risks.

The audit team, after the country visit, has visited the area outside the project, and considers that the information provided by the PP is true. However, AENOR has also been able to verify that the amount of biodiversity outside Kasigau is lower. Outside the project, illegal charcoal producers have been seen in very few cases. Also, the audit team carried out nocturnal wildlife transects, and found that the number of sightings outside the project was much lower than those observed inside the project. This means that the project work is very positive and the positive effects inside the project are very noticeable.

AENOR considers that the information stated in the MR is reliable and no negative impacts on biodiversity have been observed outside of the project due to the project activities. The activities that are forbidden within the project area are illegal activities under the laws of the country. Therefore, no offsite impacts related to the project activities will be expected.

4.6.7 Net Biodiversity Benefits (B2.3)

The overall benefits of the project in terms of biodiversity are very positive. As described above, the negative effects are zero, therefore all effects are positive. This is the ninth verification event, so the PP is already fully experienced in how to manage wildlife, how to monitor it and how to enhance it. As seen in the monitoring sections of the MR, the PP identifies several variables to account for the species. In turn, the PP has provided the monitoring records and their comparison since the beginning of the project. Since 2011, 88 different species have been identified in the transects. The trend line of sightings has been slightly increasing since 2011, and these fluctuations are due to the fact that as it is an ecological corridor, animals use it as a transit zone and at certain times the amount of biodiversity decreases. However, in 2022 there were 319 sightings.

The number of patrols has also been increasing since 2011, reaching an all-time high in 2022. In addition, during 2022, rangers have identified 2594 wildlife encounters, most notably elephants, lesser kudu, giraffe, zebra and impala.

The number of incidents has also increased due to population increases, but the PP is implementing more patrolling and collaborative measures in areas further away from the project to prevent such damage. The audit team has asked several people about these damages, and they have reported that the KCRPI biodiversity team is always present, and when they are informed of any danger or conflict, they come right away. The audit team has also observed different methods to avoid approaching the crops, such as fences with metal anchors that scare away elephants.

For KCRPI, the audit team confirmed through interviews, review of documentation and observation of previous verifications that the baseline scenario is mainly deforestation due to unplanned agricultural expansion by subsistence farmers. This is normally preceded by charcoal production and pole harvesting which are the major causes of forest degradation. By safeguarding HCV biodiversity elements, protecting forested ecosystems and habitats within and around the project area, reducing the potential for incidence of human-wildlife conflict and maintaining wildlife corridors, the verifiers find that the project activities as a result of the PP's interventions have resulted in net positive biodiversity impacts. The routine Ranger patrols and other monitoring activities were an effective mechanism to detect and deter illicit activities, as it has been demonstrated in the MR and reviewed by records and the onsite visit. By reducing deforestation and degradation threats within the project area, the verifiers area reasonably assured that the ecosystems and species that rely on them for their habitat will be protected and maintained. The projects carbon stocking data assessed by the verifiers also clearly shows the maintenance of forest carbon stocks which is linked to the maintenance and enhancement of biodiversity.

The audit team has performed several interviews with other stakeholders than the Wildlife Works staff. All of them have recognized that the number of animals within the project boundaries is noticeable higher. Complementary, the VVB has observed that the forest density within the project area is also higher due to the strict measures of protection. The audit team has interviewed several members of the Kenian Wildlife Service as well and some rangers and they have explained their routine and how they proceed when they find some illegal activity within the project boundaries. The VVB during the biomass plot inventory, has travelled for many roads of the Kasigau, and the number of sightings was high. The audit team was able to observe: elephants, giraffes, buffaloes, dik-dik- galagoes, snakes, oryx, zebras, baboons, impalas, klipspringer, gerenuk, kudus, etc. Other animals such as Lions, cheetahs, grevy´s zebra or aardwolf were identified by trap cameras and the audit team crosschecked the date of the capture.

Other activities such as the greenhouse and seedling plantations are clear signs that the project is protecting ecosystems. Also, the constructions of water holes are very important for the fauna, in this area, where the drought could be a serious survival problem.

Therefore, by direct observations, review of evidence /46-50/, with interviews during the onsite visit and comparison between the baseline and previous monitoring events, the audit team considers that the biodiversity impacts of the project are positive, and the project proponent is implementing activities to achieve positive beneficial results. The audit team considers that the information on the MR is reliable and correct, therefore, the positive benefits are clearly identified.

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

According to the MR and the descriptions of the PDD, the main strategies to obtain the monitoring indicators are: in-house reporting and fieldwork.

For the monitoring the PP uses different methods, all of them explained in the MR and shown during the onsite visit. Further evidence have been provided to demonstrate some statements. The monitoring methods are:

- Road transects: the frequency of these monitoring method is trimestral. During the current verification 319 animals have been sight. The VVB has followed the biodiversity monitoring team in some of the night transects. The team has explained how they proceed with the sightings, how they are able to identify the animals, and how they report the raw data to get the total number of sightings.

- Camera traps: the camera traps are taking photos constantly. They are a good method to identify elusive animals. The VVB has reviewed the results with the manager of biodiversity, and he has showed pictures of lions, cheetahs, grevy´s zebras, etc. Also, the audit team has visited the location and presence of some of these camera traps within the project area.

- Ranger Patrolling: The six Wildlife Works' ranger outpost teams continued to undertake both foot and vehicle patrols across KCRPI. The rangers undertook a total of 198 patrols during the reporting period, covering about 18,316 km in total KCRPI. During the period of January to December 2022, the ranger ground patrol teams recorded a total of 2594 encounters with wildlife in Phase 1. The audit team interviewed members of the ranger team and asked about these patrolling. Also, the VVB reviewed the results and the raw data of the monitoring during the onsite visit. The VVB has observed the vehicles and the transects they normally use for monitoring as well as the way in which the rangers note some sightings.

- Aerial patrolling: in 2022, there were 74 aerial patrol days/tracks in the KCRPI project area from the two gyrocopters, covering a total of 15,718 km. the frequency of this monitoring is monthly. The audit team has verified the gyrocopters and also has reviewed the data of these aerial patrolling with the biodiversity manager, who has explained the tracks used, the way in which the pilots record the sightings and the maintenance of these gyrocopters.

- Daily encounters: this is another method of biodiversity monitoring. It consists of the sightings observed by the daily routine by rangers, communities or visitors.

Therefore, the monitoring plan is compliant with the CCB-VCS-PDD. According to AENOR, the monitoring plan reflects the situation on the ground accurately. Measures scheduled and designed by the project proponent to maintain or enhance the biodiversity are correct and results confirm their effectiveness. AENOR considers that the date of frequency and the results of the monitoring are correct according to the information reviewed.

4.6.9 Biodiversity Monitoring Plan Dissemination (B3.3)

Results from monitoring plan implementation are disseminated online through the VCS / CCB website, popular and / or scientific publications, and key or relevant highlights disseminated to the communities through community meetings or Barazas or the annual/biennial SIA Community Workshops. During the M9 reporting period, biennial household survey was undertaken in March and April 2022 and the results will be presented and discussed with the communities in May 2023. AENOR has reviewed the dissemination by the webpage and asked to the stakeholders about the dissemination of the monitoring plan and the results. All the interviewed recognized that the dissemination was done correctly, and they were able to review the results. Complementary, the PP has provided the minutes of the last SIA workshop. Therefore, AENOR deems that the information provided on the MR is reliable and correct. Hence, the dissemination of the monitoring plan is under the CCB requirements.

4.7 Additional Project Implementation Information

As applicable for the project's validation to the CCB Gold Level criteria for exceptional biodiversity benefits, the MR includes information summarizing the general threats to the trigger species, as well as population trends for the trigger species over the course of the project life through M9. All the key High Conservation Value species that are listed under some category of threat globally in the latest IUCN Red List – African elephant, Grevy's zebra, Lion, African Wild Dog, Leopard, Cheetah, Secretary bird, Martial Eagle, Bateleur and several vulture species – were repeatedly recorded across KCRPI during M9, including evidence of breeding from Elephant calves, Grevy's Zebra foals, Lion and Cheetah cubs.

The audit team has reviewed the evidence to demonstrate the presence of these species. Trap cameras images are the best method to verify the presence of evasive species. For example, the audit team was able to directly observe elephants, martial eagle, secretary bird and some vultures. However, for other species, the best method to observe them is by trap camera records. The biodiversity team showed to the VVB records of cheetahs, lions and African wild dogs among others.

The audit team considers that the PP's actions, including protection of the forest resources and wildlife habitats found on the project area and broad engagement with communities to address the underlaying issues causing deforestation and degradation of the project area is positively contributing to the maintenance and improvement of trigger species populations found on the project area. Complementary, WWC Ranger patrols and enforcement to address poaching of animals was found to be an affective measure to address illegal poaching within the project area. The PP maintains a continual presence in the project area with Rangers conducting routine patrols, as well as dedicated aircraft for nearly daily aerial patrols.

4.8 Additional Project Impact Information

The project has been implemented properly as per the PDD and the CCB standards during the M9 event. Therefore, the project has resulted in positive in the climate, community and biodiversity benefits.

5 VERIFICATION CONCLUSION

AENOR has verified that THE KASIGAU CORRIDOR REDD+ PROJECT PHASE I – RUKINGA SANCTUARY, is in compliance with the CCB Version 2 and VCS Version 3 without qualifications or limitations. The project has been implemented in accordance with the validated Project Description. AENOR can also verify with a reasonable level of assurance that THE KASIGAU CORRIDOR REDD+ PROJECT PHASE I – RUKINGA SANCTUARY has created and achieved overall net positive Climate, Community, and Biodiversity benefits during the monitoring period

The verification of the ex-post emissions of THE KASIGAU CORRIDOR REDD+ PROJECT PHASE I – RUKINGA SANCTUARY has been conducted by AENOR in accordance with ISO 14064-3;2019.

Verified GHG emission reductions provided by the project proponent and verified by AENOR has resulted in a total net GHG Emissions Reduction of 225,194 tCO2e by the project during the monitoring period (01 January 2022 to 31 December 2022). Considering 13% of buffer withholding based on the VCS Non-Permanence Risk Assessment Tool v4.0, which means a buffer allocation of 29,276 tCO2e, the Verified Carbon Units (VCU) to be issued are 195,918 tCO2e.

Verification/monitoring period: 01 January 2022 to 31 December 2022.

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

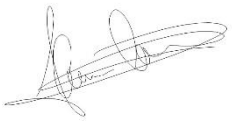
Year	Baseline emissions or removals (tCO2e)	Project emissions or removals (tCO2e)	Leakage emissions (tCO2e)	Net GHG emission reductions or removals (tCO2e)	Buffer pool allocation	VCUs eligible for issuance
2022	225,194	0	0	225,194	29,276	195,918
Total	**225,194**	**0**	**0**	**225,194**	**29,276**	**195,918**

Overall non-permanence risk rating: 13%

Total VCUs to be issued: 195,918tCO2e.

Date: 13 September 2023

Lead Auditor
Javier Cócera



APPENDIX 1: LIST OF EVIDENCE

Evidence assessed	
Main documents	
General documentation	
1	Annex 1 - Kenya Organisation Chart.pdf
2	Annex 2 - The Kasigau Corridor REDD Project Phase I Monitoring Plan FINAL v2.pdf
3	Kasigau Corridor Phase I M9 MR Summary_English.pdf
4	Kasigau Corridor Phase I M9 MR Summary_Swahili.pdf
5	Kasigau Corridor Phase I VCS Template PD.pdf
6	Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.5.pdf
7	The_Kasigau_REDD_Project_VCS_Methodology_PD_v9.PDF
8	Rukinga CCB PDD.pdf
Carbon calculations	
9	KCPI Full Data M9.xlsx
10	KCRP I and II M9 Plot Monitoring.xlsx
11	KCRPI Forest Carbon Inventory Model & NERs M=9 v1.4.xlsm
12	KCRPI I Leakage Model_M9_v1.xlsx
13	LEAKAGE PLOTS M9.xlsx
14	M9 Verification_Phase I&II separation stats.xlsx
15	Kasigau Corridor Soil Calc M8 v2.xlsx
16	QAQC KCRPI Forest Carbon Inventory Model & NERs M=9 v1.3.xlsm
17	RUKINGA RANCH M9 QC PLOTS BIOMASS.xlsx
GIS	
18	KCRPI_Landcover.shp
19	KCRPI_SoilPlots.shp
20	KCRPII_Project_Area.shp
21	KCRPII_SoilPlots.shp
22	KII_LandCover.shp
23	Leakage_Plots.shp
24	PhaseI_Biomass_Plots.shp
25	PhaseI_Leakage_Area.shp
26	PhaseI_Rukinga_PA.shp
27	PhaseII_Biomass_Plots.shp
28	PhaseII_Leakage_Area.shp
29	Reference_Area.shp
SOPs and Policies	
30	Annex 3 - Standard Operating Procedure Kasigau_PhaseI - Forest Inventory v3.3_2022-10-21.pdf
31	Annex 4 - Standard Operating Procedure - Disturbance Monitoring - v3.0_2021-09-22.pdf
32	Annex 5 - Standard Operating Procedure Kasigau - Leakage v1.0_01_01_2011.pdf
33	Annex 6 - SOP - Kasigau Soil Field Sampling v3.6 2017-10-05.pdf
34	Annex 7 - SOP - Soils Bulk Density v1.6 2017-07-27.pdf

35	Annex 8 - Quality Control Procedure v1.6.pdf
36	Annex 9 - Kasigau Data Management SOP v1.pdf
37	Annex 10 - Child Labour Remedial Policy.docx
38	Annex 11 - Wildlife Works Sexual Harassment Policy.docx
39	Annex 12 - WWC ESG Policy on Cattle Grazing Intervention FINAL.doc
40	Annex 13 - Wildlife Works Sanctuary, EPZ & Rukinga Code of Conduct.pdf
41	Annex 14 - Fire and Emergency Evacuation plan wall version Final.docx
42	Annex 15 - EPZ Electrical Preventative Maintenance Plan .xlsx
43	Annex 17 - Image Classification Protocol.docx
44	Annex 18 - Wildlife Works_Health & Safety Policy & Procedures_Final25Nov2020.pdf
45	Annex 19 - HR employment procedures- Marungu location..docx
Biodiversity	
46	01040211.JPG
47	07010021.JPG
48	09100038.JPG
49	12180029.JPG
50	Night Transect datasheets.pdf
51	Eco Charcol Stats 2022.xlsx
52	KCRP HWC Mitigation_2022.csv
Property rights and deeds	
53	Amaka Ranch CE Final.pdf
54	Amaka Ranch Title Deed.pdf
Non Permanence Risk Report	
55	VCS Non-Permanence Risk Report Kasigau I_M9_v3.pdf
56	VCS Non-Permanence Risk Report Kasigau_M9_NaturalRisksEvidence v1.pdf
57	Kenya WGI 2022 Indicators.xlsx
Meetings and grievances	
58	Public comment period notice- Swahili version by Joseph..docx
59	SBIA March-2021 Workshop minutes.docx
60	Suggestion Box Scans and Response.pdf
61	KCRP Livelihoods_1st Workshop report_August-September 2022.docx
62	HR All Training Events_2022.xlsx
63	KCRP Community Awareness Meetings_2022.xlsx

APPENDIX 2: VERIFICATION FINDINGS

Corrective Action Request (CARs)

CAR ID:	**01**	**Date: 10/04/2023**
Description of CAR		
Regarding Verra Registry, the name of the project is incorrect and has difference with the validated PD and previous MRs. The same issue has been found in section 2.1.1		
Country participant response		**Date:** 20/04/2023
The Project name on the Verra Registry is “The Kasigau Corridor REDD Project – Phase I Rukinga Sanctuary”. This same name appears on the validated PD. We acknowledge that the Project name used in the M9 MR includes a “+” symbol with the acronym REDD in the Project name (e.g. The Kasigau Corridor REDD+ Project - Phase I The Community Ranches”), but “REDD+” has been used as the Project name in the MRs since the project’s fourth monitoring period. We consider this to be a non-issue, and not representative of a nonconformance. This has not been identified as an issue in past verifications, nor has it been raised as a concern by Verra during accuracy reviews of previous verifications.		
Documentation provided by the Country Participant		
Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.2.pdf		
VVB Assessment		**Date:** 10/05/2023
It is clear that, during other verifications, Verra has passed the slightly change in the project name. Therefore, CAR 01 is closed		

CAR ID:	**02**	**Date: 10/04/2023**
Description of CAR		

The following incongruences have been found:

1. In the initial table, there is an incongruence with the crediting period of the PD
2. According to previous MRs, some figures of table 1.1 are lower than the previous verification event. Also, the sum of the actual MP is mandatory. Therefore, these figures are wrong.
3. In section 1.2, under the GHG ER, the figure is wrong considering previous MR and the current one.
4. In section 1.2 there is an error with the average of employment of 51 employees during the last 3 years
5. In section 1.2, under women employment section, the Net benefit is required. It means, the sum of total employment in the MPs.
6. In section 1.2, under livelihoods women, in the total achievement, there are not achievements in total during this MP. Please explain it.
7. In section 1.2, there are incongruences with the water projects in the project lifetime regarding the sum of MPs.
8. In section 1.2, it is stated that 3 critically species are the total achievements of the project. However, there is an error with the sum of these species.

Country participant response	**Date:** 20/04/2023

The items identified in this finding have been addressed as follows:

1) We are unclear on the incongruence identified in this item of the finding. The crediting period as stated in the PD is 01 January 2005 – 31 December 2034. (PD Section 5.2: "*The Project Start Date and the Crediting Period Start Date are both January 1st, 2005. VCS project crediting period: The VCS Project Crediting Period is January 1st 2005 thru December 31st 2034.*"). These same dates and 30-year crediting period are entered in the title page table of the M9 MR provided to the verifiers.

2) We have reviewed the Table of Unique Project Benefits in section 1.1 of the MR. After checking with the Kasigau project team, we have confirmed the correct project achievements over the monitoring period and project lifetime and updated the M9 MR as appropriate. For Hadithi sales, the lower figures are due to differences in the USD-KES exchange rates. We used the prevailing KES-USD exchange rate during conversions, which was significantly lower in 2021 compared to 2022.

3) The NER values presented in Section 1.2 of the M9 MR are correct, please refer to the previously provided file "KCRPI Forest Carbon Inventory Model & NERs M=9 v1.4.xlsm" for the calculation of these values. However, on review it was discovered that the NER value presented in the Achievements during the Project Lifetime" column of the section 1.2 of the M8 MR (the previous monitoring period) was incorrect. During the calculation of the number during M8 (3,644,823) the NERs from the projects first year were excluded in error (162,219). The correct value that should have been presented in M8 is 3,807,042.

4) The average number of people employed in in the project activities over the past three years, in the Achievements during the Project Lifetime column of Table 1.2, has been updated. The correct figure is 58 employees when considering the past 3 years of M7 – M9 (2022 – 2020).

5) We are unclear on this item of the finding. The table in section 1.2 of the MR does given the total number of women employed in project activities during the monitoring period (16, or 28% of the total). When reporting on this indicator for the achievements over the project lifetime, we provide the long-term average number of women employed. We feel this is a more meaningful way to report on this indicator rather than the net total number employed and note the MR Template instructional guidance does not dictate this metric is required to be reported as the net benefit. Further, the long-term average has been reported in past MRs that have been verified and approved by Verra.

6) As the KCRPI project has been operating for many years the project activities have largely been fully implemented. As such, the activities from which we report benefits for the livelihoods for women category of this table largely supports the same group of women year after year. Therefore, we report this number as the "Achievement during project lifetime," but we do not want to report it as a new benefit in the monitoring period to ensure that there is not any confusion or potential of double counting. We feel that these are important activities and the benefits that they provide are essential for the communities, and therefore these should be included in this table. However, we want to be clear when the benefit is not increasing the number of people benefited, but rather continuing to support the same group of people.

7) Upon following-up with the Kasigau Team, the correct number of water projects was confirmed to be given in the Phase I & Phase II Separation Stats workbook, and is 10 over the project lifetime for the Phase I project.

8)After seeking clarification from the Kasigau Team, it was clarified that there are 3 Critically Endangered species (African wild dog, white-backed vulture and White-headed vulture) and 6 Endangered species (Grevy's zebra, African elephant, Secretarybird, Bateleur, Martial eagle and Lappet-faced vulture). The sum for both Critically Endangered and Endangered species is nine (9). The value nine (9) has been entered into section 1.2 of the MR to reflect the total combined number of critically endangered and endangered species for the Project.

Documentation provided by the Country Participant

Kasigau Corridor Phase I VCS Template PD.pdf

Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.2.pdf

KCRPI Forest Carbon Inventory Model & NERs M=9 v1.4.xlsx

M9 Verification_Phase I&II separation stats.xlsx

VVB Assessment	**Date:** 12/05/2023

1. According to the PD v.9, of the Phase I, within section 5.2, there is the following statement: *The project was commenced on January 1, 2005. Since this time, Wildlife Works has been successfully protecting Rukinga Ranch from agricultural encroachment (deforestation), wildlife poaching and forest degradation. The Phase I Project is 30 years in length. The project will therefore end on December 31, 2035*. However, it has been stated later, in next findings, that the validated end date in 2035 as an error. Is it possible to provide some notification from Verra advising of the error and correction of the date? Because the PD on the Verra Registry indicates the wrong date.
2. Section 1.1 has been updated and deemed correct.
3. The finding was indeed referred to the sum of the previous MR and current MR. now, it is clear thanks to the clarification of the total NERS of the M8.
4. The value has been updated. However, according to the M7, the number of employees for such period was 350. Therefore, the average does not match. Please clarify.
5. The section is clear and deemed correct.
6. The clarification provided by the PP is deemed correct.
7. In M8 it is stated that since 2012, 8 water projects has been created. In the current MP is stated that one water project has been created. Therefore, the sum since 2012 is not 10. However, if it has been verified with the workbook, please indicate that the previous figure of the m8 was not updated.
8. The section has been updated and deemed correct.

Country participant response	**Date:** 23/05/2023

1. We now acknowledge this mistake in the PD for the project. However, the project record in the registry reflects the correct crediting period, and the intent of the correct 30-year crediting period seems clear from the PD (“The Phase I Project is 30 years in length”) including the current and past MRs. However, to acknowledge the incorrect end date of the crediting period in the validated PD, we propose to document the mistake as a PD deviation in the M9 MR. We have added the following text in section 2.2.4 of the M9 MR, under the M9 Deviations heading. “A mistake in the crediting period dates was identified in the validated PD, which incorrectly shows the 30-year crediting period from the start dates of January 1, 2005, ending on December 31, 2035. The correct end date of the initial 30-year crediting period is December 31, 2034.”

4. We are unclear where the value of 350 referenced in this findings was found. The number of employes reported in section 1.2 of the M7 MR was 53, was 58 in the M8 MR, and is 63 in the M9 MR. The average reported in the M9 MR for the achievements over the project lifetime, is 58, which is the average of these values from M7 – M9.

7) There does appear to have been a mistake in our reporting and in the separation stats workbook provided. There was an error where we reported the total number of water projects started by December 31st, 2022, not completed by that date. For KCRPI and II combined the total number of water projects completed is 62, not 69. When this error is corrected the total number of water projects derived for KCRPI is 9. We apologize for this mistake and have adjusted the MR text to report 9 cumulative water projects.

Documentation provided by the Country Participant	
Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.4.pdf M9 Verification_Phase I&II separation stats.xlsx	
VVB Assessment	**Date:** 30/05/2023
1. The solution proposed by the PP is deemed correct. 4. The section is clear and deemed correct 7. The section is clear and deemed correct Therefore, CAR 02 is closed	

CAR ID:	**03**	**Date: 10/04/2023**
Description of CAR		
According to the VCS and CCB Monitoring report Template: 1. The template has specific requirements for format and section´s title. However, for the section “summary of project benefits” the header does not comply with the template requirements. 2. In section 1.2: For each metric, quantify the net benefit the project has achieved during the monitoring period covered by this report and since the beginning of the project lifetime. However, for health categories, the net benefits are missing, therefore, the requirement is not fulfilled. 3. In section 2.1.1: “Describe how leakage and non-permanence risk factors are being monitored and managed”. However, the information about NPRR, risk rate and buffer is not stated. Therefore, the requirement is not fulfilled. 4. In section 2.1.7: Indicate the project location and geographic boundaries (if applicable) including geodetic coordinates.. However the coordinates are not included. Hence, the requirement is not fulfilled. 5. In section 2.1.10: “Describe how the project contributes to achieving any nationally stated sustainable development priorities, including any provisions for monitoring and reporting same.”. Please, explain the goals and their contribution. 6. In section 2.2.4, “Describe any project description deviations applied during this monitoring period, identify which section(s) of the project description have been updated and explain the reasons for the deviation. Identify whether the deviation impacts the applicability of the methodology, additionality or the appropriateness of the baseline scenario and provide an explanation of the outcome”. However, the requirement is not fulfilled.		
Country participant response		**Date:** DD/MM/YYYY

The items identified in this finding have been addressed as follows:

1) The section number of the header summary for section 1, Summary of Project Benefits has been fixed and now correctly shows as section 1.

2 This information was left out in error. We have updated this section to include an estimation of the health benefit over the lifetime of the project. *)*

3) We consider the MR template instructional guidance for section 2.1.1 cited in this item of the finding ("*Describe how leakage and non-permanence risk factors are being monitored and managed*") to be fulfilled in the M9 MR. As described in the second to last paragraph of section 2.1.1, any potential leakage is measured directly in the project's leakage area, and no leakage was observed for the monitoring period. References to applicable sections of the MR & PD where more information on the Project's leakage monitoring methods are given. This paragraph also states that non-permanence risk factors are assessed and reported according to the requirements of the VCS non-permanence risk tool. The non-permanence risk report for the Project's ninth monitoring period has been provided to the verifiers.

While the text in section 2.1.1 of the MR gives limited detail on how leakage and non-permanence risk factors are being monitored and managed, references to where additional details can be found are given. Further, the MR template instructions indicate that the Implementation Description provided in section 2.1.1 should not exceed one page in length. We have adhered to this guidance, while providing summary information for all required content. It is not possible to further elaborate on leakage and non-permanence monitoring in this section without exceeding the guidance for this section to not exceed one page.

4) The map included as Figure 4 in section 2.1.7 of the MR includes the broad coordinates of the project area in decimal degrees (dd). We consider this to fulfil the MR template instructional guidance for including geodetic coordinates of the project location. Further, the MR template instructions state "*Coordinates may be submitted separately as a KML file*." Shapefiles of the project area boundaries have also been provided to the verifiers further fulfilling the MR template instructions.

5) Section 2.1.10 of the MR clearly indicates that the project contributes to the SDGs adopted by Kenya, through the climate, community and biodiversity benefits provided by the Project. The SDGs the project directly contributes to are also outlined in this section. References to Sections 3, 4 & 5 of the MR are included in this section, where additional detail on how the project contributes to the SDGs can be found. This section of the MR also clearly states that the contributing benefits are monitored through the project's climate, community and biodiversity monitoring plans.

We consider the text provided in section 2.1.10 of the MR to fulfill the MR template instructional guidance. The project contributes to achieving nationally stated sustainable development priorities through the climate, community and biodiversity benefits provided by the Project ("*Describe how the project contributes to achieving any nationally stated sustainable development priorities*…"). Provisions for monitoring and reporting of contributions to achieving nationally stated sustainable development priorities is facilitated through the project's climate, community and biodiversity monitoring plans ("…*including any provisions for monitoring and reporting same*.").

We feel any additional detail on project contributions to SDGs in this section of the MR would be redundant with the detailed information given in sections 3, 4 & 5 of the MR.

6) The Project Description Deviations applicable to M9 are described in section 2.2.4 of the MR. There is also a statement indicating that the "*deviation does not impact the applicability of the methodology, additionality or the appropriateness of the baseline scenario…*". No updates to the PD were made related to this deviation, and a statement of such has now been entered at the end of the final paragraph of section 2.2.4 ("*No updates to the PD were made related to this deviation*.")

We consider this information to fulfil the MR template instructional guidance for this section.

Documentation provided by the Country Participant

Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.2.pdf	
VVB Assessment	**Date:** 12/05/2023

1. Section´s header has been updated as per template requirements
2. The section has been updated and deemed correct.
3. The clarification is deemed correct.
4. The coordinates on the GRID of the map are considered valid.
5. The activities implemented to achieve SDGs are clear through the field visit and the additional understanding of the project. However, to facilitate the understanding of these SDGs on the project, for the external readers, little suggestion is to include a brief sentence of activities developed for each goal. For example: Goal 6: Clean water and education → construction of waterholes and local hospitals; Goal 10: reduced inequalities → job opportunities, safety…
6. The issue has been solved.

Therefore, CAR 03 is closed

CAR ID:	**04**	**Date: 10/04/2023**
Description of CAR		

According to the VCS and CCB Monitoring report Template:

1. In section 3.1.4, “Describe how any results of monitoring undertaken in accordance with the monitoring plan, have been disseminated and made publicly available on the internet. Describe how summaries (at least) of the results have been communicated to the communities and other stakeholders”. However, the requirement is not met.
2. In section 4.1.1, “describe the impacts on each community group. Also, provide further information about impacts in those communities”. However, the requirement is not met
3. In section 4.2.1, “Describe the activities and/ or processes implemented to mitigate the negative well-being impacts on other stakeholders”. However, the requirement is not met
4. In section 5.1.1, “Describe all the changes in and impacts to biodiversity resulting from project activities under the with-project scenario in the project zone during this monitoring period. Impacts must include all those identified in the validated CCB project description and any other unplanned impacts. Explain and justify key assumptions, rationale and methodological choices. Provide all relevant references.”. None of the sections created comply with the requirement. Suggestion to redact again.
5. In section 5.1.2, “Demonstrate that that no High Conservation Values related to biodiversity identified in the validated CCB project description were negatively affected by the project”. However, the requirement is not met
6. In section 5.2.1, “document any actions taken during the monitoring period to mitigate potential or actual negative offsite biodiversity impacts resulting from project activities. Clearly identify the impact and the mitigation action”. However, the requirement is not met.

Country participant response	**Date:** 20/04/2023

The items identified in this finding have been addressed as follows:

1) We are unclear on this item of the finding, and what concern is being raised. The text in section 3.1.4 of the MR states "Climate monitoring results are included in this document, which is made publicly available, with hard copy availability for review at the Project Office. Additionally, a monitoring report summary has been written and provided to communities throughout the Project Area in English and Swahili. The monitoring report has additionally been posted to the CCB website for public review and comment." We consider this information to adequately address the MR Template instructional guidance, and the information entered in this section of the M9 MR remains unchanged from the previous M8 MR which was accepted by Verra. WWC's approach to the dissemination of the Monitoring Plan and Results has not changed.

2) The impacts of the project are discussed on the 2 community groups identified in the Project's CCB PD are discussed in section 4.1.1. The PD identifies the 2 major community groups as the Taita and Duruma peoples. This section indicates that the impacts of the project will be felt generally equally for these 2 groups. To help clarify this section we have added some additional text to the 3rd paragraph in this section documenting the positive impacts for these 2 community groups from the project.

3) We are nuclear on the concern being raised in this item of the finding. He MR Template instructional guidance states "Describe the activities and/or processes implemented to mitigate the negative well-being impacts on other stakeholders." Section 4.2.1 of the MR describes how; "The potential negative impacts on offsite stakeholders were mitigated through actions towards avoiding or reducing human-wildlife conflicts, broadening of incomes sources within these communities to reduce reliance on Wildlife Works as the sole income source (through employment), plus regulated access for grazing during the dry periods (see details under Section **¡Error! No se encuentra el origen de la referencia.**)."
Further, section 4.2.1 asserts that "Wildlife Works submits that there are no net negative impacts on offsite stakeholders as a result of KCRPII because there was no legal harvest of forest resources or wildlife from the Project Area. On the contrary, we believe that Wildlife Works has had a very positive impact on offsite stakeholders, regionally in the Project Zone, nationally in Kenya, and internationally." We consider the text entered in this section of the MR to fulfil the MR Template instructional guidance, and it is not clear what additional information the verifiers think may be necessary.

4) Considering the MR Template instructional guidance for this section ("Describe all the changes in and impacts to biodiversity resulting from project activities under the with-project scenario in the project zone during this monitoring period. Impacts must include all those identified in the validated CCB project description and any other unplanned impacts. Explain and justify key assumptions, rationale and methodological choices. Provide all relevant references."), we consider the informational content of the MR to be met as follows.

The changes in, and impacts to biodiversity resulting from the project activities under the with-project scenario in the project zone during the monitoring period are described. "As we demonstrate under the Monitoring Plan section, Wildlife Works' core activities are aimed at protecting, safeguarding, or improving the status of biodiversity and wildlife across the entire KCRPII area, with a focus on HCV species. This is achieved by addressing the focal areas identified; i) Safeguarding HCV species, ii) Protecting the habitat including Mt. Kasigau, iii) Reducing human-wildlife conflicts, and, iv) Corridor maintenance. The successful protection of critical dryland forest during this monitoring period and documented throughout this report demonstrates the size, quality and diversity of habitat has been maintained.

The four focal areas in which the project intends to impact are based on the validated CCB PD. The key assumptions, rationale and methodological choices are described and are related to the focal issues identified during the original Social and Biodiversity Impact Assessment workshops held in 2011.

The information given in section 5.1.1 of the M9 MR is consistent with what has been provided in past monitoring periods which has passed the scrutiny of previous verifiers and been accepted by Verra.

5) Safeguarding HCVs is one of the four focal areas identified for the Project coming out of the original SBIA workshops held in 2011. Wildlife Works' core activities are aimed at protecting, safeguarding or improving the status of biodiversity and Wildlife across the entire KCRPI area, with a focus on HCV species. Safeguarding HCV species is achieved through improved monitoring, patrol and law enforcement, which in turn Will lead to reduced poaching, plus improved habitats (e.g. from water provision through dam scooping).

Section 5.1.2 of the MR says as much, and clearly refers to the "fact that KCRPI is set up on the whole to protect critical wildlife habitat and ecosystem functions, there were several actions specifically undertaken during the reporting period towards the enhancement of HCVs in KCRPI including security, habitat enhancement and improved monitoring."

By effectively protecting the wildlife habitat within the Project area, the HCVs related to biodiversity will not be negatively impacted. By protecting the project area, the HCVs related to biodiversity within KCRPI is better than it would have been in absence of the Project.

6) Section 5.2.1 of the MR clearly states "The potential negative impacts for biodiversity from our project implementation are increased poaching outside the project area and increasing human-wildlife conflicts due to growing wildlife populations. As described in the above sections, KCRPI has significant realized or potential positive impacts on biodiversity, across different wildlife species and ranging from individuals and populations to ecological functions. Additionally, Wildlife Works routinely patrols areas outside KCRPI either on routine patrols or under the direct request of the landowners in these ranches. Being out of our jurisdiction, when Wildlife Works does not have express authority from the landowners, we engage the resident KWS Teams to make any required follow ups."

Therefore, no actions were taken during the monitoring period to mitigate potential or actual negative offsite biodiversity impacts resulting from the Project activities. The cited paragraph from section 5.2.1 of the MR above describes what efforts the Project is making to ensure there are no negative offsite biodiversity impacts, even though we believe there to be none.

Documentation provided by the Country Participant	
Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.2.pdf	
VVB Assessment	**Date:** 12/05/2023
1. Please, explain how the documentation was disseminated to the communities in the project area with more details. 2. The section has been clarified and it is deemed correct. 3. Please, provide further information about the actions to avoid or reduce human-wildlife conflicts and other impacts stated in paragraph 1. 4. After the visit, this section is clarified and deemed correct. 5. Please, provide further information about these activities taken to improve the conservation of the values. 6. The section has been clarified through the field visit and better understanding of the activities.	
Country participant response	**Date:** 24/05/2023
1) The documentation in question is disseminated to communities via each communities' Chief's office, community meetings, and barazas. It is typical for the Chief's office to post the MR summary translated to Swahili, which contains the climate monitoring results, on their community bulletin board. This is a common form of communication in this area and is readily accessible to members of the community. 3) We believe that the text in this section adequately meets the template's requirements but have added the following text to paragraph 1 to expand on the type of patrols WWC conducts. "Wildlife Works deploys two gyrocopters to monitor the project area ands rapidly deploy teams if a wildlife incident is detected. In addition to the gyrocopters and regular patrols by Wildlife Works Rangers Community Scouts also perform regular patrols and report incidents of human-wildlife conflict to Wildlife Works staff." 5) The following text has been added to section 5.1.2 to explain in more detail the actions that protect HCVs "Specific security measures for HCVs include ranger patrols that work to apprehend and deter poaching. Habitat enhancements including damn scooping and borehole sinking so HCVs have a reliable water source within the project area. Improved monitoring of HCVs occurs through regular ranger patrols, aerial monitoring with gyrocopters, and community wildlife scout patrols."	
Documentation provided by the Country Participant	
Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.4.pdf	
VVB Assessment	**Date:** 30/05/2023
1. The dissemination methods are deemed clear and correct 2. The section has been updated and deemed correct 3. The section has been updated and deemed correct. Therefore, CAR 04 is closed	

CAR ID:	05	Date: 10/04/2023
Description of CAR		
The following errors have been found in header 2 “General”: 1. In section 2.1.6, there is an incongruence according to the PDD and the crediting period. 2. In section 2.3.2, the public comment period is incorrect according to the verra registry		
Country participant response		**Date:** 24/04/2023
1) We are unclear on the issue raised in this item of the finding. Section 2.1.6 of the MR clearly identifies the project’s 30-year crediting period (“The Project crediting period started on January 1st, 2005 and will end on December 31st, 2034 (30 years). The Project length for KCRPI is 30 years and will end on December 31, 2034. Section 5.2, Temporal Boundaries, of the VCS PD states, “The project was commenced on January 1, 2005. Since this time, Wildlife Works has been successfully protecting Rukinga Ranch from agricultural encroachment (deforestation), wildlife poaching and forest degradation. The Project is 30 years in length. The project will therefore end on December 31, 2035.” The statement in section 5.2 of the PD “The project will therefore end on December 31, 2035” is an error. The project will end on December 31, 2034 as stated in the MR. 2) We acknowledge section 2.3.2 of the MR incorrectly referred to the public comment period for the previous monitoring period and M8 verification in 2022. Section 2.3.2 of the MR has been updated to reflect the correct public comment period dates for the current monitoring period and M9 verification (March 8th to April 7th, 2023).		
Documentation provided by the Country Participant		
Kasigau Corridor Phase I VCS Template PD.pdf The_Kasigau_REDD_Project_VCS_Methodology_PD_v9.pdf Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.2.pdf		
VVB Assessment		**Date:** 12/05/2023
1. The clarification is deemed correct. It has been reviewed in the M5 project description deviations, in which there is information about the error. However, there is missing information in this m5 deviation about the ending on December 2004 (difference with the PD). There is information about the start date and the length but not about the final date. 2. The section has been updated and deemed correct.		

Therefore, CAR 05 is closed

CAR ID:	**06**	**Date: 10/04/2023**
Description of CAR		
The following errors have been found in header 3 “Climate”: 1. In section 3.1.2, within the parameter NP,k, the total number of possible plots figures does not match with the excel data 2. There is an error with the parameters: $C_{BE,SOIL}^{[m9]}$, $cumulative\ GER^{[m9]}$, $\bar{o}^{[m9]}$, $F_{LE}\left(t_2^{[m9]}, \hat{\eta}^{[m9]}, \hat{\delta}_{LE}\right)$, $F_{LE}\left(t_2^{[reevaluation-1]}, \hat{\eta}^{[reevaluation-1]}, \hat{\delta}_{LE}\right)$		
Country participant response		**Date:** 27/04/2023
1) We found no errors in the reporting of parameter NP,k. Please refer to the Carbon & Errors Calculations tab of the KCRPI Forest Carbon Inventory Model & NERs M=9 v1.4.xlsm. 2) We recognize that $C_{BE,SOIL}^{[m9]}$ was reported incorrectly in the MR, this value has been updated. Table 7 has been updated to correct the typo that existed in the reported $cumulative\ GER^{[m9]}$ The parameter $\bar{o}^{[m9]}$ was reported in the MR as 0.453, we found no error in this calculation, but have chosen to increase the number of significant digits and are reporting 0.4526 now. The calculation for this parameter is found in cell AH18 of the leakage model. We found no errors in the calculation or reporting of this parameter. The parameter, $F_{LE}\left(t_2^{[m9]}, \hat{\eta}^{[m9]}, \hat{\delta}_{LE}\right)$ has been updated. The parameter $F_{LE}\left(t_2^{[reevaluation-1]}, \hat{\eta}^{[reevaluation-1]}, \hat{\delta}_{LE}\right)$ was reported as 0.4210, this has been corrected to 0. The value is zero because baseline revaluation has not occurred for the KCRPI yet.		
Documentation provided by the Country Participant		
KCRPI Forest Carbon Inventory Model & NERs M=9 v1.4.xlsm KCRPI I Leakage Model_M9_v1.xlsx		
VVB Assessment		**Date:** 12/05/2023
1. The decimals of the total number of possible plots do not match between the Excel and the table of section 3.1.2 value NP,k 2. $C_{BE,SOIL}^{[m9]}$ $has\ been\ corrected$. Cumulative GER(m9) is still incorrect in page 133; $\bar{o}^{[m9]}$ $is\ corrected$. FLE parameters have been corrected.		

Country participant response	**Date:** 24/05/2023
1) The decimal values for NP,k have been corrected. 2) The cumulative GER(m9) has been corrected.	
Documentation provided by the Country Participant	
Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.4.pdf	
VVB Assessment	**Date:** 30/05/2023
The sections have been updated and the parameters are deemed corrected. Therefore, CAR 06 is closed	

CAR ID:	**07**	**Date: 10/04/2023**
Description of CAR		
The following errors have been found in section 5 " Biodiversity" 1. Please, include the BD monitoring plan in section 5.3.2 instead of section 4.3.2. Dates and frequency of the monitoring are missing. 2. In section 5.3.4.1 it is stated M8. Complementary, these sections are not part of the CCB&VCS template		
Country participant response		**Date:** 24/04/2023
1) We are unclear on the concerns being raised in this item of the finding. Section 4.3.2 outlines the Community Monitoring Plan and associated results during M9. While some of the indicators in Table 13 of section 4.3.2 may be tied to biodiversity monitoring, such as the Ranger and security patrols, the indicators and associated reporting shown in section 4.3.2 were directly developed and are the outcome of the Social Impact Assessment (SIA) workshops held for the Project. Regarding the dates and frequency of biodiversity data collection, data is collected continuously over the monitoring period and reported on a calendar year basis, which corresponds to the annual monitoring periods. It is not practical to include specific biodiversity monitoring dates, as data collection is continual and on a daily basis. Further, we consider the descriptions given for the figures provided throughout section 5.3.2 to provide adequate clarity on the timing of the biodiversity monitoring (e.g. Figure 29: "During this 2022 monitoring period", Figure 32: "During the reporting period, Jan-Dec 2022", Figure 34: "from 2011 to the 2022 reporting period" (each year given its own unique data column), Figure 38 "during the aerial patrols during 2022" etc. We consider the information presented in section 5.3.2 of the MR to provide adequate detail on the timing of the biodiversity monitoring activities. Further this is the way the biodiversity monitoring data has been presented in previously verified MRs approved by Verra.		

2) The template is missing a section to address the Optional Criterion – Exceptional Biodiversity Benefits. In discussions with Verra it was agreed that this should be added to ensure that these requirements could be demonstrated in an organized and clear fashion. In addition, with the transition to CCB V3 there was some new CCB requirements that Verra wanted all projects to adhere to, this is seen in section 5.4.2 with requirement CL3.3 from CCB v3. Therefore, we have detailed how the project addresses the Exceptional Biodiversity Benefits requirements in section 5.4 in the M9 MR. All erroneous references to M8 have been removed from the MR.
Documentation provided by the Country Participant
Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.2.pdf

VVB Assessment	**Date:** 12/05/2023
1. The information of the biodiversity section, specifically for monitoring plan, is very deep and clear if you have visited the project or if you are the project proponent. It was discussed with Geoffrey during the audit to improve this section for external understanding and apparently it was clear. I recommend and suggest to implement a chart or a table with the variables, activities and results to make the section clearer. There is a lot of information and graphics difficult to understand if you have not visited the project. Although it was approved by Verra in previous verifications, they are getting harder with their reviews, and our mission is to comply with the framework and understand the project and the process. 2. The clarification provided is deemed correct.	

Country participant response	**Date:** 24/05/2023
1) We have added some additional numerical values to the text of this section to make it easier to follow so the reader does not always need to reference the connected figure for a value. Additionally, we did note that some figures were inadvertently duplicated (this was more of an issue in KCRPII) and caused paragraphs to be split in an unintentional way. These duplicate figures have been removed and the text should flow better now.	
Documentation provided by the Country Participant	
Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.4.pdf	

VVB Assessment	**Date:** 30/05/2023
Section updated and deemed correct. Therefore, CAR 07 is closed	

Clarifications (CLs)

CL ID	01	Date: 10/04/2023
Description of CL		
Please, provide the following evidence: 1. The 8,394 briquettes stated in section 1.1 2. In section 2.3.4, the 10 comments received during this MP and the way in which they were solved. 3. The HR policy stated in section 2.4.3 4. The trainings manual of section 2.4.5 5. Provide evidence of the following statement: Additionally, as part of continuous engagement and consultation, the Project Proponent continually holds meetings with Project stakeholders and the surrounding communities to update them on the Project implementation process, status and any other emerging issues, and receive any new comments, requests, suggestions or grievances from the stakeholder of section 2.5.2 6. The leakage model for phase I, because the one provided in the initial folder is for phase II		
Country participant response		**Date:** 27/04/2023
1) Please see the provided Eco Charcoal Stats 2022.xlsx. This excel sheet shows the number of briquettes produced on specific days throughout 2022, and the total that were crushed, or used for demonstration. The grand total of 8,394 briquettes is found in cell K147. 2) As indicated in section 2.3.4, 10 comments were received during the M9 monitoring period, only one was a complaint. The complaint was related to human-wildlife conflicts and the claim that some community members had been harassed by Wildlife Works' rangers. To address this issues, Wildlife Works' community outreach and security departments organised a baraza (meeting) that included a friendly football match between the youths and the rangers where there were mutual discussions about the conflicts, where they originated from and how to avert them in future. Use of unnecessary force was also discussed and would be avoided in future in-line with the Wildlife Works' Security Policy and Procedures. All comments submitted through the suggestion boxes are opened by a committee each month. The committee consists of Administration (Chiefs), Locational Carbon Committee, Bursary Committee, Partnering CBO Committee and Wildlife Works representatives. All boxes are opened and read in the presence of the committee, any query or complaint that is linked to the Chief will be directly taken by the Chief, any that is linked to the project will be sent to the disbursement committee for responses. Those who have written their contacts will be called directly to answer their questions or complaint. Those who did not write their contacts are answered by posting the answer through community notice boards. Complaints and queries that are asked during public meetings or committee meetings can be answered during the meetings and are well documented. In a scenario where there is no answer, the question will be referred to the senior management or disbursement committee and a follow-up will be done at a later date.		

Wildlife Works also has an open-door policy where complainants can come directly to see any Senior Manager for responses.

The document Suggestion Box Scans and Response.pdf shows examples of comments received through the suggestion box in the Busho community and WWC's response to the community.

3) The Kasigau Corridor REDD+ Project's HR Policies was provided to the VVB as Annex 19.

4) The Occupational Health and Safety Policy and Procedures Manual was provided to the VVB as Annex 18.

5) Please see section 4.3.2.1 Project Activity M9 Implementation Status and figure 19 for detailed reporting of community outreach meetings held in 2022. In total 87 community meetings were held across KCRPI and a cumulative total of almost 8,401 local community members attended these meetings.

6) We recognize the KCRPI leakage model was not provided in our initial submission of annexes and have provided it in response to these findings.

Documentation provided by the Country Participant

Eco Charcol Stats 2022.xlsx.

Phase II Leakage Model_M9_v1.xlsx

Suggestion Box Scans and Response.pdf

Annex 19 – HR employment procedures- Marungu location.docx

Annex 18 - Wildlife Works_Health & Safety Policy & Procedures_Final25Nov2020.pdf

KCRPI I Leakage Model_M9_v1.xlsx

Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.2.docx

VVB assessment	**Date:** 12/05/2023

1. Evidence provided is deemed correct.
2. Evidence provided is deemed correct.
3. Evidence provided is deemed correct.
4. Evidence provided is deemed correct
5. Please, provide the external evidence to demonstrate the statement.
6. The evidence provided is deemed correct.

Country participant response	**Date:** 26/05/2023

In response to the request for external documentation supporting the referenced community outreach meetings held during 2022, we have provided a sample of minutes from 10 community meetings from four of the six project locations. We consider the sample (over 10%) of meeting minutes from the community outreach meetings to be sufficient to support the implementation of these activities during the monitoring period.

Documentation provided by the Country Participant

Kasigau location.pdf

Mackinon location.pdf

Marungu Location.pdf

Sagalla Location.pdf

VVB Assessment	**Date:** 30/05/2023
the evidence provided is deemed correct. Therefore, CL 01 is closed	

CL ID	02	Date: 20/05/2022
Description of CL		
Please, provide the following explanations or further information about the following sections: 1. In section 1.2, under training section, only Lusario group is mentioned in the total achievements of the project lifetime. Provide explanation about the other groups stated in previous MRs. 2. In section 1.2, explain the change in "change in the number of hectares significantly better managed by the Project for Biodiversity conservation, measured against the without project scenario" between current and previous MPs. 3. In section 2.1.1, please explain how is the 18th year of implementation because PDD was createdin 2011 and MP7 indicates 10th year in previous event. 4. In section 2.2.1, in the implementation schedule, please explain if were some milestones after 2021 5. In section 2.2.3, please provide further information about the changes of community monitoring plan. 6. In section 2.2.5, please provide further information about the measures implemented. 7. In section 2.2.6, please clarify what is or are the HCV. It is not clear. Also, zebra is described as critically endangered and currently is endangered. Same for African wild dog. Taiita trush is not critically endangered as per IUCN. 8. In section 2.3.3, provide further information about the process of other documents. Also, provide information if the communities are able to understand the documentation and if there are other materials easier to be understood.		
Country participant response		**Date:** DD/MM/YYYY
1) Section 1.2 notes support of just the Lusario group, this is different than prior monitoring periods because in 2022, the Sechu and Kulikila groups were interrupted after struggling with water availability due to the prolonged drought, which made follow-up support by Wildlife Works greenhouse difficult. Bungule and Lusario continued to be supported, and since reporting for KCRPI and KCRPII need to be separate we reported Lusario for PI an Bungule for PII. 2) The number of hectares reported for "change in the number of hectares significantly better managed by the Project for Biodiversity conservation, measured against the without project scenario" has been reported as 30,169 ha since the Standardized Benefit Metrics table was included into monitoring reports in MP5. There has been no change in reporting, and therefore no explanation of change is necessary. 3) We believe the VVB is mistaken, and was looking at the prior KCRPII MR and PDD. KCRPI started in 2005 and therefore 2022 is the 18th year of implementation. 4) We are unclear on why the VVB is requesting an explanation of if there were milestones after 2021. In 2.2.1 the implementation schedule does include milestones in 2022, the M8 CCB and VCS verifications are listed. 5) Section 2.2.3 of the MR starts by stating that deviations to the community monitoring plan have occurred. The subsequent paragraphs list the changes that have been made to the community monitoring plan. The bolded text identifies the indicator that has been modified and the text below		

explains in detail how and why an indicator was modified. We recognize that there was ambiguity in this section and have added text to make it clear that the indicators listed in the section are the ones that had modifications occur.
6) It is unclear what further information the verifier expects for section 2.2.5. Major risks to the project are identified and written about at length to fulfil the CCB and VCS Monitoring Template. The information provided on the methods or activities to mitigate these risks is all current and is reflective of what was implemented during this monitoring period.
7) We recognize that certain species were regarded as critically endangered while their status is endangered. The text in section 2.2.6 has been adjusted to refer to species as endangered, not critically endangered.
8) The Monitoring Report and the Monitoring Report Summaries are the key project documents that contain relevant information on project implementation pertaining to the monitoring period that are made available to communities and other stakeholders. We consider the information given in section 2.3.3 to provide adequate detail on how the Monitoring Report and Summaries are distributed to communities and other stakeholders. It is not clear what "other documents" the verifiers are considering here, but distribution of the Monitoring Report and Summaries are what is required by the CCB standards.

The Monitoring Report summary is made available to communities and stakeholders in both English and Swahili versions, ensuring that community members can understand relevant information on project implementation. Section 2.3.1 of the MR details the stakeholder engagement activities of the Project. A Community Engagement and Outreach Department has been established and regular meetings are held with communities and stakeholders including schools to both disseminate Project information, and to receive and address comments, suggestions and grievances. The effectiveness of the Project's stakeholder engagement approach is something we would have expected to have been assessed in the field, but we believe our methods provide communities and stakeholders with access to all relevant project information in a manner that is understandable and adapted to their needs.

Documentation provided by the Country Participant	
Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.2.docx	
VVB assessment	**Date:** 12/05/20223

1. The section has been clarified and deemed corrected.
2. The section is clear and deemed correct.
3. It was a misunderstanding since within the previous MR there is an error, stating that it was the 10th year in 2021. It is deemed correct.
4. The section has been updated with the new dates of the year 2022. However, explain if there were not more relevant milestones within the M9 that could be reported in the table.
5. Therefore, differentiate the indicators from the main title "deviations to the community monitoring plan". If I understood correctly, school constructions, wildlife factory… are part of the community monitoring plan deviations. Then, differentiate these categories under deviations to the Community Monitoring Plan.
6. Please, provide direct examples of the measures implemented to mitigate the risks.
7. The section has been updated. Also, the information about the HCV was clear by the field visit.
8. The information provided by the PP has clarified the statement.

Country participant response	**Date** 25/05/2023

4) As previously stated, we included major milestones that occurred in 2022 and do not have any additional milestones to add to the implementation schedule.

5) All of the bolded titles under “Deviations to the Community Monitoring Plan” are the deviations in question. The text “Modifications have been made to the indicators listed below and continue through the present monitoring period” has been added to this section to clarify that the school constructions, ecofactory, greenhouse, etc. are the specific deviations to the community monitoring plan.

6) In response to a KCRPII finding we have added Increased Human-wildlife conflict as a risk to the project. We have also added the text “Additionally, Wildlife Works runs an organic greenhouse project that provides training and seedlings to communities that has led to agriculture diversification and livelihood improvement.” To the crop failure risk. Aside from this additional point we provide many direct examples of the measures implemented to reduce risk in this section including:

- Seeking international press to make sure our project is in the spotlight and the Kenyan government knows the continued value of the KCRPI
- Using ranger patrols to keep cattle grazers out of the project area
- Providing emergency water resources to wildlife in the event of drought
- Educating the public, especially the youth, about the dangers of burning fallows

Reducing wildlife conflict through active patrols and response, testing various deterrents, improved farming methods, and creating boreholes for water within the project area.

Documentation provided by the Country Participant	
Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.4.pdf	
VVB Assessment	**Date:** 30/05/2023

4. the section is deemed correct

5. the section is deemed correct

6. section updated and deemed correct

Therefore, CL 02 is closed

CL ID	03	Date: 10/04/2023
Description of CL		
Please, provide the following explanations or further information about the following sections: 1. Please, provide further information about the advertisement process of section 2.4.3. explain whether it was performed online, directly though internet… 2. In section 3.1.1, explain if the area of leakage for the project is the same than the area of the project, due to the figures are the same compared with the SHP. 3. In some sections it is stated that the file used is KCRPI forest carbon inventory model & NERs M=9 v.1.3. However, the current version of the document is the 1.4 4. In table 5 of section 3.2.1.1, please, explain why the strata "out" is considered for the sum of the area but not used for the total mean of carbon stock 5. In section 3.2.1.2, the file provide for soil analysis is for m8. Explain why. Also, in thable 6, explain if the values are the same for m8 since these used are from m8. 6. Section 3.3.2 is duplicated and also, it does not appear on the template		
Country participant response		**Date:** 08/05/2023
1. Jobs with the Kasigau Corridor REDD+ Project are advertised through Chiefs' and Assistant Chief's offices, Wildlife Works community notice boards, and various social media sites including but not limited to WhatsApp, and Facebook. The information regarding the hiring process of staff is detailed in Annex 19 – HR employment procedures- Marungu Location. 2. We are unclear of the concerns being raised in this finding. The leakage area reported in section 3.1.1 is 30,169.00 ha; this area is calculated in GIS from the Phasel_Leakage_Area.shp that was shared with the VVB. Additionally, the "Source of data" for this parameter is reported in the MR as "GIS analysis prior to sampling", this is accurate and explains that the leakage area is obtained through GIS analysis. 3. All references to the KCRPI forest carbon inventory model & NERs M=9 document has been updated to refer to v1.4. 4. The out stratum is not used to calculate the mean carbon stock because the out stratum is already separated from the forest strata and receives zero VCS credits. If the out stratum was to be included in the mean carbon stock we would be artificially lowering our forest carbon stock while double counting the negative impact of the out strata. The alternative of excluding the out strata in the average and assigning it a zero-carbon stock and zero credits is including the 108.56 ha area in the average and allow it to be counted towards generating carbon credits. This is less conservative than the current method of counting the out area as zero and removing it from the forest area all together. It should also be noted that the KCRPI project predates the creation of Project Accounting Areas, so the out strata was created as a solution to remove these areas from the carbon accounting area. 5. The soil carbon model provided, Kasigau Corridor Soil Calc M8 v2.xlsx is the current soil model applicable for M9. The reason why the model is named M8 and that there was no		

change in reported soil carbon stocks between M8 and M9 is because all soil plots were measured in M8, this is noted in section 3.2.1.2. In accordance with section 13.1 of the VCS Methodology VM0009 v1.0 “all plots and all strata must be re-measured every 5 years”. Given that all soil plots were measured in 2021 no soil plots needed to be re-measured in 2022. Additionally, it is stated in section 3.1.2 for the parameter ρ_{mesoil} that the frequency of monitoring is “100% of soil sample plots are measured once every five years.”

Section 3.3.2 relates to CCB standard V3 requirement GL1.4. The project is validated under CCB V2 and continues to be verified under that version of the standard, However, during the transition from V2 to V3 Verra requested that we incorporate some requirements from V3 into our monitoring reports where they felt it was a gap in the V2 of the standard. This section is one of these instances. Duplicate headings were fixed.

Documentation provided by the Country Participant
Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.2.docx KCRPI Forest Carbon Inventory Model & NERs M=9 v1.4.xlsm

VVB assessment	**Date:** 12/05/2023

1. Please, include the information in the MR
2. The clarification provided is deemed correct
3. The modification is deemed correct
4. The section is clear and deemed correct
5. This is clear and deemed correct
6. It is clear. However the duplicated headings were not fixed 3.3.2 & 3.3.1

Country participant response	**Date:** 23/05/2023

1. The information provided in the written response to item #1 of this finding has now been entered into section 2.4.3 of the MR. (“Jobs with the Kasigau Corridor REDD+ Project are advertised through Chiefs’ and Assistant Chief’s offices, Wildlife Works community notice boards, and various social media sites including but not limited to WhatsApp, and Facebook. The information regarding the hiring process of staff is detailed in Annex 19 – HR employment procedures- Marungu Location.”)

5.1.1 6) The duplicate headings (Activities and/or Process Implemented for Adaptation in section 3.3.1 & 3.3.2 have been removed. All the text in these sections of the MR is now under just section 3.3.1 - Activities and/or Processes Implemented for Adaptation (GL1.4, V3: GL1.3.).

Documentation provided by the Country Participant
Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.4.pdf

VVB Assessment	**Date:** 30/05/2023

Sections have been updated. Therefore, CL 03 is deemed closed

CL ID	04	Date: 10/04/2023
Description of CL		
Please, provide the following explanations or further information about the following sections: 1. In section 4.1.1, it is stated that five follow up SBIA workshops have been held. However, the sum of the years is wrong. Also, provide evidence of the last SBIA. In this section, also provide further information about the impacts of with-project scenario 2. Sections 4.1.1.1 and 4.1.1.2 are not described in the template as new sections. Please explain the creation of these sections. 3. In section 4.1.2, please identify within table 12 what are the activities from without and with project scenario 4. In section 4.1.3, it is stated that the main HCV is the Mt Kasigau. Please explain if there are others HCVs. Also provide evidence to demonstrate those activities to enhance the HCV. 5. Section 4.3.2.1 is not part of the template and within this section there are references to M8 6. In section 4.3.2.1, please explain if these activities are new or are implemented since other MR, because they are the same than previous MP. 7. In section 4.3.2.1, explain why the section " stakeholder engagement and community meetings" is not included under section 2.3.1 8. In section 4.3.3, explain if the MP and results of summaries have been disseminated by internet as well.		
Country participant response		**Date:** DD/MM/YYYY
The items raised in this finding have been addressed as follows: 1) We have corrected the reference to the total number of follow-up SBIA workshops held in the years 2013, 2014, 2015, 2017, 2019 and 2021 (6). Documentation on the last SBIA workshop held during the year 2021 associated with M8 has now been provided to the verifiers. *2)* We added section 4.1.1.1 and 4.1.1.2 to the document template to aid in organization and provide clarity in the information provided. The requirement in section 4.1.1.2 relates to CCB standard V3 requirement CM1.3. The project is validated under CCB V2 and continues to be verified under that version of the standard, However, during the transition from V2 to V3 Verra requested that we incorporate some requirements from V3 into our monitoring reports where they felt it was a gap in the V2 of the standard. This section is one of these instances. *3)* We have revised table 12 to clarify which column is the without project scenario and which one covers the project activities implemented to-date. The column that includes information on project activities implemented to date is the with project scenario. 4) The Mt. Kasigau ecosystem is the primary HCV identified by the Project. Other HCVs are considered HCV Wildlife species classified as vulnerable or endangered as identified in the MR. These include the African Elephant, Grevy's Zebra, African Wild Dog, Secretarybird, Lion, Cheetah, White-backed Vulture, Lappet-faced vulture, Leopard, Bateland, Taita Apalis, Taita Thrush, and Martial Eagle.		

5) References to M8 have been changed.

6) The listed activities were initiated in prior monitoring periods or at project start but continue to be actively run to this day. As stated in the MR "All Projects are currently operational and were operational for the entirety of the M9 monitoring period." Results of their operation in 2022 are reported below the list of activities.

7) Stakeholder engagement and community meetings are included in 4.3.2.1 for the same reason described in response to CL ID 03.7. Section 4.3.2.1 relates to CCB standard V3 requirement G3.8. The project is validated under CCB V2 and continues to be verified under that version of the standard, However, during the transition from V2 to V3 Verra requested that we incorporate some requirements from V3 into our monitoring reports where they felt it was a gap in the V2 of the standard. We have additionally added reference to section 4.3.2.1 in the text of section 2.3.1.

8) Results of the monitoring plan are detailed in the monitoring report, which is public on the Verra registry, therefore the results are available via the internet. As noted in the MR we disseminate the results through community meetings or barazas. We have found this to be a more effective and accessible method than dissemination digitally.

Documentation provided by the Country Participant
Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.2.docx

VVB assessment	**Date:** 12/05/2023

1. There is still an error with the reference of the Five Follow up SBIA and the years of these seminars.
2. This is clear and deemed correct
3. Section has been updated and deemed correct
4. Section is clear and deemed correct
5. The issue has been solved
6. The clarification is deemed correct
7. The clarification is deemed correct
8. The clarification is deemed correct

Country participant response	**Date:** 23/05/2023

1. We apologize for this oversight. The statement in question has been revised to reflect the correct total number of follow-up SBIA workshops held (6).

"Six follow up SBIA workshops have been held (2013, 2014, 2015, 2017, 2019 and 2021) following up on these issues by reviewing project implementation issues and household survey data, plus assessing whether there have been any major changes or emerging issues."

Documentation provided by the Country Participant
Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.4.pdf

VVB Assessment	**Date:** 30/05/2023
Section updated and deemed correct. Therefore CL 04 is closed	

CL ID	05	Date: 10/04/2023
Description of CL		
Please, provide the following explanations or further information about the following sections: 1. In section 5, explain why new sections have been created modifying the template numeration 2. In section 5.3.2, it is stated that "The Wildlife Works' security team recorded a total of 160 incidents within KCRPI during the reporting period," please explain if the reporting period is the total lifetime or only 2022. 3. In section 5.3.4.2, new sections have been created within the MR. However, under these sections the text is referred to other sections without relevant information. Please, include information in such sections which have been created extra.		
Country participant response		**Date:** 05/05/2023
1) The template is missing a section to address the Optional Criterion – Exceptional Biodiversity Benefits. In discussions with Verra it was agreed that this should be added to ensure that these requirements could be demonstrated in an organized and clear fashion. In addition, with the transition to CCB V3 there was some new CCB requirements that Verra wanted all projects to adhere to, this is seen in section 5.4.2 with requirement CL3.3 from CCB v3. Therefore, we have detailed how the project addresses the Exceptional Biodiversity Benefits requirements in section 5.4 in the M9 MR. All erroneous references to M8 have been removed from the MR. 2) The reporting period being referenced in 5.3.2 is the reporting period this monitoring report is documenting, which is January 1st 2022 to December 31st 2022. 3) We are unclear on the section being referred to in this finding as no section 5.3.4.2 exists in the monitoring report. We did create section 5.4 to address Exceptional Biodiversity Benefits requirements. The reason for creating this section has been explained in response to CAR 07.02.		
Documentation provided by the Country Participant		
Kasigau Corridor PI_M9_Monitoring_Report_CCB v2.0_VCSv3.4_V2.2.docx		
VVB assessment		**Date:** 12/05/2023
1. The section is clear and deemed correct 2. The section is clear and deemed correct 3. The clarification is deemed correct Therefore, CL 05 is closed		

CL ID	06	Date: 12/04/2023

Description of CAR

The following issues have been found in the Non Permanence Risk Report:

1. Within the opportunity cost, please, provide further information and evidence to demonstrate that "Baseline is subsistence and project has demonstrated net positive community impacts"
2. Provide further information about why risk factor a) and b), within community engagement, are not applicable.
3. Provide the evidence to demonstrate the LS of Natural Risk – Fire
4. Within Extreme weather, provide further information about it. In spite the species are drought resistant, during the visit it was understood that more than one year drought was occurring.

Country participant response	Date: 05/05/2023

1) It is noted that assessment of the Project baseline is outside the scope of this verification audit. The project baseline, being slash and burn agriculture by subsistence farmers. Detailed information regarding the assessment and determination of the project's baseline and demonstration of additionality can be found in the validated PD.

Demonstration of net positive community impacts is evident through the project's successful verification against the CCB standards over the past eight monitoring periods. Continued demonstration of net positive community impacts during the current monitoring period (M9) is detailed in the M9 MR provided to the verifiers.

2) Regarding Community Engagement risk category, a) this risk category is only applicable when there are community households living in the project area and who are reliant on the project area ("Less than 50 percent of households living within the project area who are reliant on the project area, have been consulted."). As no community members live within the project area who are reliant on the project area, this risk category is considered non-applicable.

Regarding Community Engagement risk category, b), there are community households living within 20 km of the project boundary outside of the project area who rely on the project area. However, the Project has held extensive community meetings throughout the region and performed many outreach activities with the total local population living within 20 km of the Project boundary who are dependent on the Project area for their livelihood, and we believe over 20% of these households have been consulted. To document every meeting WWC has had with the communities in the Project Zone since we began working in the region would be impossible, but there have been literally thousands of consultations held with community groups surrounding the project area.

3) A supporting document justifying the natural risk scores for the M9 Non-Permanence Risk Report has been provided to substantiate the LS of natural fire risk for the project.

4) A supporting document justifying the natural risk scores for the M9 Non-Permanence Risk Report has been provided to substantiate the LS of natural extreme weather risk for the project.

Documentation provided by the Country Participant

VCS Non-Permanence Risk Report Kasigau I_M9_v2.pdf

VCS Non-Permanence Risk Report Kasigau II_M9_NaturalRisksEvidence v1

VVB Assessment	Date: 12/05/2023

1. Note that the NPRR is within the scope of the audit, and the verifiers could ask for whatever until close all the doubts. Each verifier in different MP is completely different and will focus on different topics. The same for Verra, the reviews from 2022 are harder than previous years. Our mission is to comply with all the requirements, provide a full understanding of the documentation while trying to avoid future comments from Verra in its PRR. I ensure that most of these comments and findings that AENOR has raised, have been also raised by Verra in different projects. The clarification provided is deemed correct
2. The section is clear and deemed correct
3. The evidence has not been provided
4. The evidence about natural risks has not been provided

Country participant response	**Date:** 22/05/2023
3 & 4) We apologies. The supporting document justifying the natural risk scores for the M9 Non-Permanence Risk Report was inadvertently left out of the documents submitted in response to the Round 1 Findings. The document (VCS Non-Permanence Risk Report Kasigau_M9_NaturalRisksEvidence v1.pdf) has now been provided to the verifiers.	
Documentation provided by the Country Participant	
VCS Non-Permanence Risk Report Kasigau_M9_NaturalRisksEvidence v1.pdf	
VVB Assessment	**Date:** 30/05/2023
Evidence provided and deemed correct. Therefore, CL06 is closed	