VERIFICATION REPORT

TIST PROGRAM IN KENYA, VCS–CCB 010

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Project Title	TIST Program in Kenya, VCS-CCB 010
Version	1.2
Report ID	CCB_VCS_Kenya010_verification report_v1.2

Report Title	TIST Program in Kenya, VCS-CCB 010 Verification Report
Client	Clean Air Action Corporation (CAAC)
Pages	57
Date of Issue	07-September-2021
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Summary

AENOR has carried out the verification of the TIST Program in Kenya, VCS-CCB 010 under the VCS and CCB Programs. The project is an Afforestation, Reforestation and Revegetation (ARR) project implemented in central Kenya, in the vicinity of Meru and Nanyuki. The International Small Group and Tree Planting Program (TIST) is a combined reforestation and sustainable development project in Kenya carried out by subsistence farmers. The farmers plant trees on their land and retain ownership of the trees and their products. They receive training from TIST and a share of the carbon revenues. Up to date, the project has planted 743,303 trees in 2,293 ha.

The project start date is 1 February 2015 and will be operational until 1 February 2075. The estimated net GHG emissions reductions and removals at validation for the 60-year project span were 5,937,992 tCO_2e, at an average of 98,967 tCO_2e/yr. The emissions removal for the current monitoring period (01-February-2015 to 01-February-2020) is 24,560 tCO_2e. This is a grouped project.

The purpose of the verification was to determine the conformance of the project with respect to the VCS Version 4 and CCB Third Edition and the validated PD, and the assessment of the ex-post monitored anthropogenic GHG emissions reductions and/or removals that have occurred as a result of the project's activities. The scope of the verification was to assess the conformance of validated project, once implemented, with the VCS and CCB requirements and requirements in the validated PD. The process was performed through a combination of desk review, interviews, and communications with relevant personnel. This is the first verification event, corresponding to the monitoring period from 01-February-2015 to 01-February-2020.

During the verification 3 CLs and 1 CAR were raised for VCS and 11 CLs and 2 CARs for CCB. All these issues where appropriately closed by means of corrections, more clear explanations, and other supporting documents.

Once all issues detected were appropriate resolved, AENOR carried out this final verification report and deems with reasonable level of assurance that the project complies with all of the verification criteria. 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 cumulative net GHG emissions reductions or removals of 24,560 tCO_2e over the monitoring period has been quantified in accordance with VCS rules. A buffer discount rate of 10% was applied, resulting 22,104 VCUs eligible for issuance. AENOR confirms that the project has achieved the Climate Gold, Community Gold and Biodiversity Gold distinctions for the verified monitoring period in accordance with the Third Edition CCB Standards.

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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 (PD), including the monitoring plan.

• The extent to which GHG emission reductions and removals reported in the monitoring report (MR) are materially accurate.

1.2 Scope and Criteria

The scope of the verification included the review of the GHG project and implementation; physical infrastructure, activities, technologies and processes of the GHG project; GHG sources, sinks and/or reservoirs; types of GHG's; and time periods covered. The project follows the framework of Afforestation, Reforestation and Revegetation (ARR) projects. The geographic verification scope is defined by the project boundary, the carbon reservoir types, management activities, inventory program, and contract periods.

The monitoring period for this verification is from 01-February-2015 to 01-February-2020.

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

Standard criteria: Criteria from the following documents were used to assess this project:

- VCS Standard v4.0
- VCS Program Guide v4.0
- VCS AFOLU Non-Permanence Risk Tool v 4.0
- CCB Program Rules v 3.1
- Third Edition CCB Standard v3.1

Unless otherwise indicated, the assessment was performed against the most recent version of the relevant VCS and CCB guidance documents.

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.

The threshold for materiality with respect to the aggregate of errors, omissions, and misrepresentations relative to the total reported GHG emission reductions/removals was five percent (5%), as established for projects by the VCS Standard.

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.

1.4 Summary Description of the Project

The International Small Group and Tree Planting Program (TIST) empowers Small Groups of subsistence farmers in Kenya to combat the devastating effects of deforestation, poverty and drought. Combining sustainable development with carbon sequestration, TIST supports the reforestation efforts of subsistence farmers in their own lands. Carbon credit sales generate participant income and provide project funding to address agricultural, HIV/AIDS, nutritional and fuel challenges.

As a grass roots initiative, Small Groups are provided a structural network of training and communications that allows them to build on their own internal strengths and develop best practices. Small Groups benefit from a new income source; the sale of carbon credits that result from the sequestration of carbon from the atmosphere in the biomass of the trees and soil. The carbon credits create a new 'virtual' cash crop for the participants who gain all the direct benefits of growing trees and also receive quarterly cash stipends based on the GHG benefits created by their efforts. The maturing trees and conservation farming provide additional sustainable benefits that far exceed the carbon payments. These include improved crop yield, improved environment, and marketable commodities such as fruits and nuts.

The project TIST Program in Kenya, VCS-CCB 010 was formed at the moment of this verification by 6,321 individual project areas covering 2,293 ha located in Kenya, in the regions of Bomet, Gatanga South, Kandara South, Kirinyaga, Kuresoi, Laikipia East, Laikipia West, Mbeere South, Meru South, Narok South, North Imenti, Nyamira North, Nyamira South, Nyandarua, Nyeri North, South Imenti, Tharaka, and Tigania. 1,567 Small Groups and 10,007 members have planted 743,303 trees, removing 24,560 tCO_2e during the current monitoring period and since project start.

In addition to GHG removals, the project has demonstrated:

i. Climate change adaptation benefits: TIST farmers are trained to use climate resilient planting techniques. The project supports farmers in organizing to meet challenges of climate change, and to develop strategies for issues such as high winds, draught, and erosion.

ii. Exceptional community benefits: the project has substantial economic and non-economic benefits for poor farmers, including carbon income, improved crop yields, new crops, education, health trainings, and leadership development.

iii. Exceptional biodiversity benefits: the project has planted and maintained since the project start 4,378 Meru oaks (*Vitex keniensis)*, tree species endemic to Mount Kenya region and listed as endangered on the IUCN Red List.

2 VERIFICATION PROCESS

2.1 Audit Team Composition (*Rules* 4.3.1)

Name	Position in the team
José Luis Fuentes	Project Manager
Juan Carlos Gómez	Lead Auditor
Miguel López	Technical Reviewer

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.

Juan Carlos Gómez has more than 5 years of professional experience in climate change. He is a Forestry Engineer and holds Master in Sustainable Development and Corporate. He has developed his entire career in the field of climate change. He is an expert in the development of climate change mitigation and adaptation policies and has worked in LATAM countries and Africa, auditing REDD+ under VCS and CCB, and forestry projects under the CDM and JI.

Miguel López is a Forestry Engineer with more than 7 years of experience working in and with developing countries in fields related to community development; natural resources conservation-use; forest management, monitoring and reporting. He has large experience developing and managing programs for rural/indigenous development. He has worked and lived for 4 years in between Claveria in Northern Mindanao at the Philippines, Leticia in the Colombian Amazon, or the rural Gujarat in India.

The following table summarizes the experience of the team members in the assessment of climate, community development and biodiversity in similar projects.

Country	Project	Standard	Team member/ Role
Colombia	Bajo Calima y Bahía Málaga (BCBM) REDD+ Project	VCS&CCB	Jose Luis Fuentes/ Team leader and auditor Juan Carlos Gómez/ Auditor
Colombia	Cajambre REDD+ Project	VCS&CCB	Jose Luis Fuentes/ Team leader and auditor Juan Carlos Gómez/ Auditor
Colombia	Mutatá REDD+ Project	VCS&CCB	Jose Luis Fuentes/ Team leader and auditor Juan Carlos Gómez/ Auditor

Country	Project	Standard	Team member/ Role
Colombia	Concosta REDD+ Project	VCS&CCB	Jose Luis Fuentes/ Team leader and auditor Juan Carlos Gómez/ Auditor
Colombia	Sivirú, Usaragá, Pizarro y Pilizá (SUPP) REDD+ Project	VCS&CCB	Jose Luis Fuentes/ Team leader and auditorJuan Carlos Gómez/ Auditor
Colombia	Carmen del Darién (CDD) REDD+ Project	VCS&CCB	Jose Luis Fuentes/ Team leader and auditor Juan Carlos Gómez/ Auditor
Colombia	Rio Pepe y ACABA REDD+ Project	VCS&CCB	Jose Luis Fuentes/ Team leader and auditor Juan Carlos Gómez/ Auditor
Colombia	Acapa – Bajo Mira y Frontera (ACAPA-BMF) REDD+ Project	VCS&CCB	Jose Luis Fuentes/ Team leader and auditor Juan Carlos Gómez/ Auditor
Colombia	Proyecto de compensación de emisiones Conservación del bosque Galilea Amé.	NTC 6082/ Guía ES-I-CC-002	Juan Carlos Gómez/ Team leader and auditor
Colombia	Proyecto de Mitigación Forestal Bonanza Verde	NTC 6082/ Guía ES-I-CC-002	Juan Carlos Gómez/ Team leader and auditor
Colombia	Bonos Verdes Colombia Grupo Custodiar S.A.	NTC 6082/ Guía ES-I-CC-002	Juan Carlos Gómez/ Technical reviewer
Colombia	Recuperación de suelos degradados con el uso de incentivos financieros en el Centro y Oriente de Colombia	NTC 6082/ Guía ES-I-CC-002	Juan Carlos Gómez/ Auditor Jose Luis Fuentes/ Technical reviewer
Colombia	Proyecto de Conservación PALAMEKU KUWEI REDD+	NTC 6082/ Guía ES-I-CC-002	Juan Carlos Gómez/ Team leader and auditor
Colombia	Proyecto de Conservación Tángara REDD+	NTC 6082/ Guía ES-I-CC-002	Juan Carlos Gómez/ Auditor
Colombia	Reforestación de suelos degradados por la ganadería y la agricultura en Antioquia.	NTC 6082/ Guía ES-I-CC-002	Juan Carlos Gómez/ Auditor Jose Luis Fuentes/ Technical reviewer
Colombia	Mitigación de Cambio Climático en áreas degradadas por ganadería “Fincas La Clara y Suebrá”.	NTC 6082/ Guía ES-I-CC-002	Juan Carlos Gómez/ Technical reviewer
Colombia	Proyecto de Mitigación Forestal Resguardo Indígena Tikuna, Cocama y Yagua (TICOYA)	NTC 6082/ Guía ES-I-CC-002	Juan Carlos Gómez/ Auditor
Colombia	ForestEver Social Plantation & community development Program in various indigenous communities of Leticia.	-	Miguel López/ Program Manager & Coordinator on-site
Guatemala	REDD+ Project for Caribbean Guatemala: The Conservation Coast	VCS & CCB	Jose Luis Fuentes/ Project manager Juan Carlos Gómez/ Team leader and auditor Miguel López/ Sectoral expert
India	CSR of GCI run by Up to Green Reforestation “From the Schools to the Fields”; “Social forestation in Gujarat” and “No time to waste” rural development programs.	-	Miguel López/ Program Manager & Coordinator on-site

Country	Project	Standard	Team member/ Role
Indonesia	Indonesia - Norway Verification of reduced emissions from deforestation and forest degradation	FREL	Jose Luis Fuentes/ Project manager Juan Carlos Gómez/ Auditor
Indonesia	Rimba Raya Biodiversity Reserve Project	VCS & CCB & SD VISta	Jose Luis Fuentes/ Project manager Juan Carlos Gómez/ Team leader and auditor Miguel López/ Sectoral expert
Indonesia	Sumatra Merang Peatland Project (SMPP)	VCS & CCB	Jose Luis Fuentes/ Project manager Juan Carlos Gómez/ Team leader and auditor Miguel López/ Sectoral expert
Kenya	TIST Program in Kenya, CCB-001	VCS & CCB	Juan Carlos Gómez/ Team leader and auditor Miguel López/ Auditor
Kenya	TIST Program in Kenya, VCS-005	VCS & CCB	Juan Carlos Gómez/ Team leader and auditor Miguel López/ Auditor
Kenya	TIST Program in Kenya, VCS-009	VCS & CCB	Juan Carlos Gómez/ Team leader and auditor Miguel López/ Auditor
Madagascar	Participatory forest restoration in the forests of the Vohibola and Vohimana reserves	-	Miguel López/ Program on-site evaluator
Mozambique	Revegetation with fruit Trees in North Manica Province, Mozambique	VCS	Juan Carlos Gómez/ Team leader and auditor Miguel López/ Sectoral expert Jose Luis Fuentes/ Technical reviewer
Peru	Reduction of Deforestation and Degradation of Tropical Dry Forest in Piura and Lambayeque	VCS & CCB	Jose Luis Fuentes/ Team leader and auditor
Peru	Cordillera Azul National Park (PNCAZ) REDD+ Project	VCS & CCB	Jose Luis Fuentes/ Team leader and auditor
Peru	Reduction of deforestation and degradation in Tambopata National Reserve and Bahuaja-Sonene National Park within the area of Madre de Dios region – Peru	VCS & CCB	Juan Carlos Gómez/ Auditor Jose Luis Fuentes/ Technical reviewer
Peru	REDD+ Project in the Alto Huayabamba Conservation Concession (CCAH)	VCS & CCB	Juan Carlos Gómez/ Auditor Jose Luis Fuentes/ Technical reviewer
Peru	Forest Management to reduce deforestation and degradation in Shipibo Conibo and Cacataibo indigenous communities of Ucayali region	VCS & CCB	Elena Llorente Pérez/ Team leader and auditor Juan Carlos Gómez/ Auditor

Country	Project	Standard	Team member/ Role
Philippines	ICRAF Philippines Participative Research with claverian rural communities: "The Adoption of Agroforestry Practices by Smallholders in Claveria, Mindanao, Philippines: Diachronic Study and Determinant factors"	-	Miguel López/ Research Leader on-site
Zambia	Lower Zambezi REDD+ Project	VCS	Miguel López / Team leader and auditor Juan Carlos Gómez / Auditor
Zambia	Luangwa Community Forests Project	VCS	Juan Carlos Gómez/ Team leader and auditor Miguel López/ Auditor

2.2 Method and Criteria

The verification was performed through a combination of document review and interviews with relevant personnel, as discussed in Sections 2.3 through 2.4 of this report. At all times, the project was assessed for conformance to the criteria described in Section 1.2 of this report. As discussed in Section 2.6, findings were issued to ensure that the project was in full conformance to all requirements.

A project specific Verification and Sampling Plan was developed to guide the verification auditing process to ensure efficiency and effectiveness. The purpose of the Verification and Sampling Plan was to present a risk assessment for determining the nature and extent of verification procedures necessary to ensure the risk of auditing error was reduced to a reasonable level. The Verification & Sampling Plan methodology was derived from all items in our verification process stated above. Specifically, the sampling plan utilized the VCS guidance documents and ISO 14064-3. Any modifications applied to the Verification and Sampling plan were made based upon the conditions observed for monitoring in order to detect the processes with highest risk of material discrepancy.

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. AENOR reproduced and verified 100% of sheets in the spreadsheet *KE Monitoring Data 20210310 V3* for the monitoring period 01-February-2015 to 01-February-2020 for the project area. The project boundary for the monitoring period were 100% checked using the GIS data. The carbon stock changes were also verified and crosschecked with validated values.

AENOR carried out a deep and meticulous review of the spreadsheets in order to verify the correct application of the methodology (formulae, equations.) and checked that data required calculating the GHG removals were appropriately provided. Based on the assessment carried out, AENOR confirms with a reasonable level of assurance that the claimed emission removals are free from material errors, omissions, or misstatements.

AENOR confirms that sufficient evidence was presented for the reported net anthropogenic GHG emission removals 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 the 100% of data used in the calculations to achieve the final amount of GHG emission removals 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 were checked during the interviews.

- Cross-checked evidence: AENOR cross-checked the collected information through interviews with stakeholders and reproducing calculations.

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

2.3 Document Review

A detailed review of all project documentation was conducted to ensure consistency with, and identify any deviation from VCS program requirements, CCB program requirements, the methodology (CDM AR-AMS0007 Version 3.1), and the validated PD. Initial review focused on the MR and included an examination of the project details, implementation status, data and parameters, and quantification of GHG emission reductions and removals. Documents reviewed included data from monitoring, carbon rights contracts, economic analysis and documents, tree monitoring data, biomass and carbon calculation spreadsheets, and responses to Corrective Action Requests (CARs) and Clarifications (CLs).

The verification included a review of the validated PD and MR, relative to the field conditions and interviews with project management staff, stakeholders and beneficiaries. Modifications to the Verification and Sampling plan were made based upon the conditions observed for monitoring in order to detect the processes with highest risk of material discrepancy.

The VCS AFOLU Non-Permanence Risk Tool was used by the PP to assess overall project risk. The VVB reviewed the Non-Permanence Risk Report provided with the verification supporting documentation and confirmed that the Project adheres to the requirements set out in the VCS AFOLU Non-Permanence Risk Tool. Each risk factor was thoroughly assessed for conformance. The final score was calculated to be 10%.

For a listing of all documents received from the client for this verification, please see Appendix 1.

2.4 Interviews

Interviews were performed as part of the overall verification process which was additional to that provided in the PD, MR, and any supporting documents. The AENOR audit team met with individuals with various roles in the project. This included a series of interviews with in-country staff that support the mission of the project. In addition, interviews discussions were conducted with project members, leaders of the local communities and other project-related stakeholders. The following table summarizes the interviews carried out during the process.

Name	Role/Relation to the project
Dorothy Naitore	Leadership Council Members
Jeniffer Kithure	
Martin Weru	
Alice Kambura	TIST Quantifiers
Edward Mwenda	
Federis Muruthi	TIST Farmers/ Members
Frankline Mbae	
Hellen Kainyu	
Rose Muguna	
Julia Mpida	
Paul Kajou	
Salome Kinya	
Monica	
Joyce Mwiki	
Mr. Kinoti	Francis Kagwima Foundation (NGO)
Jane Kanana	Local Chief
John Njoroge	Kenya Forest Service

Interviewees were asked specific questions regarding the impact of the project to the environment, community and biodiversity as to cross-check with the information reported on the MR. Additionally, the personal opinion regarding the project was asked to all interviewees, expressing all of them their positive impression.

Due to the COVID-19 pandemic situation, all interviews were carried out through videoconference, as explained in Section 2.5. The interviews were carried on March 17th, 2021.

2.5 Site Inspections

Due to the exceptional situation caused by the COVID-19 crisis and the travel restrictions established by governments for safety reasons, it was not possible to carry out a site visit as part of the verification process of the project.

In accordance with VERRA's COVID-19 Travel Guidance for Projects (dated 18 March 2020), an exemption of the site visit was requested on the ground of the crisis situation and considering that a reasonable level of assurance was achievable by other means. AENOR as VVB proposed to carry out a remote verification audit that ensured the achievement of the assurance level required by both the CCB and VCS programs.

The remote audit was based on the following auditing techniques:

- Document review and cross checks between the information provided in the in the PD and supporting information and evidence provided by the project proponent (PP), emissions calculations, GIS database, and supporting information and evidence provided.

- Review, based on the selected methodologies, tools and the other applied methodological regulatory documents, of the appropriateness of formulae and accuracy of calculations.

- Telephone, teleconference and/or e-mail interviews for the implementation of project activities and the elaboration of project's documents.

2.6 Resolution of Findings

All documentation provided by the PP was assessed against the applicable version of the relevant VCS and CCB guidance document. Several clarification requests (CL) and corrective action requests (CAR) were raised and submitted to the PP, 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 PP and the audit team reassessed them against the guidance documentation. This process was repeated iteratively until all CL and CAR were fully closed. Specifically, 3 CLs and 1 CAR were raised for VCS and 11 CLs and 2 CARs for CCB.

All findings issued by the AENOR audit team during the verification process have been closed. In accordance with Section 4.1.13 of the VCS Standard, 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

This is the first verification. No FARs were raised to the PP during the current verification process.

2.7 Eligibility for Validation Activities

AENOR holds accreditation for validation for the relevant sectorial scope 14 under which this project activity is classified.

3 VALIDATION FINDINGS

3.1 Participation under Other GHG Programs

The verification team is not aware of project involvement in other forms of environmental credits from its activities. The project has not been registered, and is not seeking registration, under any other GHG programs.

3.2 Methodology Deviations

There are no methodology deviations.

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

There are no Project Description Deviations.

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

There are no Minor Changes to Project Description.

3.5 Grouped Project (G1.13 – G1.15, G4.1)

No new project areas were included into the project during the monitoring period.

4 VERIFICATION FINDINGS

4.1 Public Comments (*Rules* 4.6)

The MR was submitted to a public comment period from 18 November 2020 to 18 December 2020. No public comment was received.

4.2 Summary of Project Benefits

Section 1 of the MR 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 through interviews to relevant stakeholders and desk review. The section has been completed appropriately with data from the sources provided such as GIS package, records of trainings activities, surveys etc.

As specific and remarkable achievements for the current monitoring period the MR in its section 1.1 states 1) the participation of 10,007 famer members in the project, 2) the payment of $289,739.67 to all TIST Kenya members due to carbon revenues, 3) 212 Clusters and 1,567 Small Groups of farmers organized, 4) 4,378 Meru Oaks planted and maintained and 5) 69 TIST workers trained in ICT.

In addition, the project reports in section 1.2 of MR standardized benefits related i) GHG emission removals, ii) increase in forest cover, iii) improved non-forest land management, iv) training of community members, v) employment creation, vi) improvement of livelihoods, vii) health services improvement, viii) well-being improvement, and ix) biodiversity conservation.

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

4.3 General

4.3.1 Implementation Status (G1.9)

Section 2.1.1 of the MR provides a description of the main figures achieved by the project during first monitoring period in terms of number of small groups, members and project areas, as well as total managed

area. The information is supported with additional documents, such as community impacts reports, that give a complete information about the achievements.

The PP has monitored the project areas through regular TIST quantifiers visit to the groves, which count trees and collect circumference, GPS and other data, as per the validated monitoring plan.

The PP trains farmers in many sustainable development programs that, when implemented, generate benefits to well-being. TIST members grow trees and receive a share of the carbon revenues. They determine where to grow their trees, what species to grow that will be most beneficial to their well-being and how many to plant.

Regarding communities' issues, AENOR verified during the interviews that the technical teams of the PP in the project zone included local people speaking the local languages and they are used to translate the project information to them in a form they understand. Interviewing TIST members, AENOR verified their knowledge about the risks and benefits of the project and how their opinions are collected to be considered in the project decisions and planning. Section 2.3 of the MR provides further information about the measures for the participation of stakeholders in the decision making and the procedures for the grievances and conflicts.

Project activities designed to bring about benefits to biodiversity overlap quite with climate. It is expected that through the restoration of degraded farmland by the planting of indigenous trees, isolated woodlots will be linked and connectivity of wildlife between natural forests will be improved. In addition, among the planted trees there is the Meru oak (*Vitex keniensis*), endemic to the Mount Kenya region and listed as endangered on the IUCN Red List

The PP monitors tree species within the project zone. Section 5 of the MR shows the biodiversity monitoring results and an assessment of net positive biodiversity impacts for this monitoring period.

Section 2.1.10 of the MR describes the contribution of the project to sustainable development goals. The project activities implemented during the monitoring period have impact on the no poverty, zero hunger, good health and well-being, gender equality, clean water and sanitation, affordable and clean energy, climate action and life on land SDGs.

The implementation plan for the project activities has been also provided to the AENOR team along with the budget and implementation schedule. The project has achieved its objectives in Climate, Community and Biodiversity by implementing project activities in every program area as results confirm.

This is the first verification. There has been no methodology deviation, project description deviation nor minor change to the project description. No new project instances have been added to the project during the current monitoring period.

In conclusion, during this verification process, AENOR has not detected project changes in regards of the project title, its purposes and objectives. As such, the project activity accurately reflects the proposed project which is mainly focused on the reforestation of TIST members' lands. Through interviews with key staff, the auditor's team confirms the main objective of the project activity.

AENOR checked the monitoring plan contained in the validated PD and compared it with the monitoring report to verify whether there was any difference that would cause an overestimation of the GHG emission

removals in the current monitoring period. AENOR has confirmed that there are no material discrepancies between the actual monitoring system, and the monitoring plan set out in the PD and the applied methodology. Also, the PP effectively monitors the required parameters to determine the project's removals by sinks and emissions by sources as required by the monitoring plan and the applicable methodology.

The parameters reported, including source, frequency and review criteria as indicated in the monitoring plan were verified to be correct and in line with the revised monitoring plan of the validated PD. Necessary management system procedures including responsibility and authority of monitoring activities have been verified to be consistent with the PD. Knowledge of personnel associated with the project activity was also found to be satisfactory. For this monitoring period there are no remaining issues from previous verification (this is the first verification).

The project has not participated nor been rejected under any other GHG programs. GHG emission reductions or removals generated by the project are not included in an emission trading program or any other mechanism that includes GHG allowance trading. The project has not received or sought any other form of environmental credit.

Hence, after a complete review of the different documents provided and the interviews carried out, AENOR is able to confirm that the project implementation is in accordance with the project description contained in the PD and the implementation status described in the MR. There are no material discrepancies between project implementation and the project description.

4.3.2 Risks to the Community and Biodiversity Benefits (G1.10)

The MR describes (section 2.2.6 Risks to the Project) the risks to the project's benefits. The main risk is the carbon market itself. Reduced revenues from the sale of VCUs would mean that farmers would be less motivated to be members of the project, since they receive cash from the GHG program, and also because the PP uses its share of the revenues from the sale of GHG credits to operate the program. The PP mitigates this risk by managing the project at the lowest costs possible. It has deployed a sophisticated, yet easy to use, monitoring system and relies on capacity building with the Small Group members and their desire to improve their lives.

An additional human induced risk is farmers dropping out of the program. This is mitigated by the fact that there are thousands of individuals involved and any carbon removals loss would be compensated by the increase in carbon removals from the remaining trees on the program.

Natural risks include drought, pests, and fire. These, however, are mitigated by the fact there are thousands of individual PAs spread over thousands of square kilometers.

In addition to these risks, the PP has developed a Non-Permanence Risk Report to estimate the risks on Climate benefits in accordance with the VCS AFOLU Non-Permanence Risk Tool v 4.0.

AENOR deems that the PP correctly identified the risks to the project benefits but the most important is that has designed and 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 Community and Biodiversity Benefit Permanence (G1.11)

The MR states in section 2.2.7 Benefit Permanence that the actions implemented by the PP to maintain and enhance the benefit permanence of the project are based on trainings directed to demonstrate the benefits of the project continuation to the farmers members of the TIST program. Specifically, training on the benefits of different trees species planting, maintenance of sustainable woodlot for wood and charcoal, and biodiversity benefits from maintaining trees, as more productive soil, edible indigenous plants, etc.

AENOR verified through interviews that TIST members are aware that the permanence of the project's benefits has a direct positive impact on their well-being. When asked whether they would continue planting trees on their groves even without the support of the project, the vast majority of farmers responded affirmatively. Thus, AENOR considers that the activities planned and implemented by the PP are appropriate to ensure project benefits permanence beyond the project lifetime.

4.3.4 Stakeholder Access to Information (G3.1- G3.3)

The PP has made all of the project documentation available at TIST website. For those stakeholders without internet, the project has developed its Mobile TIST website that is low bandwidth and designed to work with a mobile phone. Additionally, stakeholders are informed by email of the publication of project reports both on TIST website and Verra registry.

Furthermore, cluster meetings allow stakeholders to learn about the project, request more information, and provide feedback. Individual clusters are notified at their monthly cluster meetings and through dissemination of the Mazingira Bora newsletter. These newsletters include the TIST URL, as well as updates and information about the program. These newsletters are distributed monthly in the local languages of participants. They further include contact information for those with questions.

Regarding information about potential costs, risks and benefits to communities, when farmers seek to join the project, they complete an application and registration process. This process of applying can last up to 7 months. During this time, cluster servants provide capacitation to the farmers on the activities and structure of TIST, through participation in cluster meetings and training sessions. This education occurs prior to baselining and formal registration into the program. In these meetings, farmers are given a chance to speak with current farmers, who can communicate their own experiences with the project.

According to the MR, the PP used the cluster and small group structures to disseminate information about the VCS/CCB verification process.

This information has been corroborated by all the stakeholders interviewed. Farmers have declared to be regularly updated on the project implementation, via cluster meetings, and confirmed that project documentation is accessible, including MR summaries and bulletins regarding project implementation. All interviewees confirmed to have been appropriately informed before being requested to enroll or sign the GHG contract to join the project. In addition, the process was confirmed by the details provided by the cluster servants/quantifiers interviewed by the audit team. All interviewed stakeholders were well aware of the purpose of the verification process and demonstrated to have at least basic knowledge of the VCS and CCB programs.

Due to the COVID-19 pandemic it was not possible for the audit team to carry out a site visit. Instead, Zoom calls were arranged with different stakeholder groups defined by the audit team. To gather the most

spontaneous and unbiased opinions as possible, the auditors elaborated a randomly generated list of farmers to interview using the information provided in the spreadsheet *KE Monitoring Data 20210310 V3*. The PP coordinated with the farmers and the other stakeholders the availability for the interviews and facilitated direct and independent communication with the audit team.

Thus, AENOR deems that the PP has provided appropriate access to information to communities and other stakeholders regarding project implementation and results, about potential costs, risks and benefits of the project to the local stakeholders, and regarding the VCS/CCB verification process.

4.3.5 Stakeholder Consultation (G3.4 – G3.5)

According to the MR, the stakeholders are primarily the individual members of the TIST program, which are mainly subsistence farmers. They own, or have rights, to the lands where the project activities take place and own the trees and tree products that are the focus of the climate change portion of the project. They join the program voluntary. TIST holds regular meetings at various levels (Small Groups, Cluster and Leadership Council) to maintain communications among the members.

When TIST begins in an area, they contact community leaders, village heads/village leaders, local NGOs and local government officials to determine if there is an interest in the program. If there is an interest, TIST holds a public seminar to present the program, answer questions, address concerns and receive comments. This is followed by regular and ongoing meetings where the public is invited to attend. TIST representatives have met with numerous State, District and Village officials seeking comment and showing them the project. In addition to the meetings, information about TIST is disseminated by word of mouth; using “Mazingira Bora”, a multi-lingual newsletter published by TIST Kenya; and direct contact with community leaders and government officials.

At the Cluster level, member farmers meet with TIST representatives regularly, where they have an opportunity to ask more questions and make more comments. Since one of TIST’s main focuses is adopting best practices, these are forums to review what is working about the program and how it can be improved. Changes to the program are announced in the newsletter.

Communications between project management and the TIST members was described as suitable by the interviewed members. Communications between the project and stakeholders is effective and nearly constant in many ways.

AENOR deems that the stakeholder consultation practices carried out by the PP during the monitoring period ensures the participation of all community groups and other stakeholders in the design and implementation of the project, respecting their values, customs and institution, as well as optimizing community benefits. Based on the evidence provided and the testimonies of community members and representatives directly consulted by the audit team, AENOR considers that continuous communication with stakeholders has been properly carried out throughout the monitoring period, directly with communities and other stakeholders or through their legitimate representatives, and that this communication has been effective in allowing stakeholders to influence the project implementation. The stakeholder input has been properly documented and it is appropriately reflected in the project’s documents.

4.3.6 Stakeholder Participation in Decision-making and Implementation (G3.6)

The stakeholder involvement in project design as well as the stakeholder communication system is described in the validated PD and the MR. The audit team was able to verify the stakeholder's involvement through the different interviews and meetings conducted and through records of different meetings and workshops. Community members demonstrated awareness and consent of the project's activities. In the opinion of AENOR, the communication and consultation plan is being implemented as described in the project design document.

Regular Small Group and Cluster meetings are carried out in which farmers can provide input. Feedback provided by the stakeholders has been used to better design and implement capacity building activities.

4.3.7 Anti-discrimination (G3.7)

The PP has developed and is implementing a sexual harassment policy and non-discrimination policy in order to ensure compliance with CCB Standards and to avoid discrimination or harassment based on gender, race, religion, and sexual orientation. This policy is enforced through grievance system in place that provides all project employees, members, and any other stakeholders with a quick-response system in the event that any discriminatory actions or sexual harassment does occur.

During the process of the verification, the audit team did not find any evidence that the project is engaging in any form of discrimination. AENOR checked and confirms that the PP has developed specific measures to prevent discrimination and to guarantee equal opportunities for community members, including women and vulnerable and/or marginalized people.

4.3.8 Stakeholder Feedback and Grievance Redress Procedure (G3.8)

The PP has developed a Grievance Policy. Grievances will first be brought to the attention of the Kenya Staff, where the issues can be compared to standard TIST policy, TIST values and/or the Greenhouse Gas agreement among the Small Group members and the PP. The policies and values are the subject of training at seminars, in the field and are published in the newsletter. Unresolved issues will be presented to TIST Management. Where precedence or policy exists, they will be used in final decision-making. Where new issues arise that are outside the existing precedence, or policy, decisions will be made by Kenya Staff and TIST Management. If conflicts or grievances cannot be resolved internally (because either one party is not satisfied, or because the complaint is made against TIST management/staff), the PP and the aggrieved party shall agree upon a mediator to whom they shall submit the issue. Any grievances not resolved through mediation shall be subject to arbitration through the Chartered Institute of Arbitrators, Kenya Branch, within 30 days of the close of mediation.

AENOR held interviews with TIST members and project staff and confirmed their knowledge of the grievance redress procedure described above. No evidence of grievances raised during the monitoring period were found. AENOR is able to confirm that the grievance procedure described in the MR and the Grievance Policy complies with the validated project design.

4.3.9 Worker Relations (G3.9 – G3.12)

Project staff receive ongoing training as needed and attend training seminars. A manual has been developed for quantifiers capacitation. During the seminars, they are trained on the TIST monitoring plan,

which includes use of the PDAs and GPS, use of the custom data collection software, how to maintain their data, synchronizing their data with the TIST server, the importance of good data, taking tracks of the Project Area perimeters, taking secondary tracks of the Project Area perimeters, counting trees, the importance of proper tree counts, identifying tree species and tree ages, taking proper circumference measurements, keeping accurate expenses, GHG contracts and any new program initiated.

The MR section 2.3.14 describes the policy for employments opportunities. Although the main management staff and computer development are in the US, the Kenya program is run by Kenyans. All TIST members have an opportunity to be group leaders, regardless of education or gender. TIST members are utilized as employees based on achievement, not gender, education or social status. TIST holds regular training seminars for Quantifiers/Cluster servants and conducts regular audits. The tech support and QAQC is led by TIST members that rose through the program based on their abilities.

The rights and obligations of workers are observed and enforced in accordance with the ILO Core Labor Conventions including the Forced Labour Convention (signed 1964), the Right to Organise and Collective Bargaining Convention (signed 1964), the Equal Renumeration Convention (signed 2001), the Abolition of Forced Labour Convention (signed 1964), the Discrimination (Employment and Occupation) Convention (signed 2001), the Minimum Age Convention (signed 1979, minimum age specified is 16), and the Worst Forms of Child Labour Convention (signed 2001).

In relation to occupational risks, the PP has developed a SOP to address safety. To ensure that safety policy and safety issues are understood, each quantifier are briefed on the safety policy annually. In these documents potential occupational risks are identified and measures and procedures are defined to eliminate or minimize them.

AENOR did not detect noncompliances with them checking the documents provided and interviewing to the workers. Then, the audit team deems that the project fulfills with CCB requirements related to labor relations.

4.3.10 Management Capacity (G4.2 – G4.3)

The MR shows (section 2.4) that the technical skills of the PP and the project staff were maintained and that project activities were implemented successfully. CAAC have proven experience and capacity in the development and management of AFOLU project, including experience in other VCS/CCB projects. The MR states that CAAC has been successfully operating TIST programs for over 20 years in four countries. Currently, TIST has 14 VCS projects that have been validated and verified.

The project has passed already the break-even point. The verifiers were able to confirm these statements with the updated budget and cash flow worksheet and financial statements provided by the PP. No evidence of any form of corruption or illegality was found during the review of the provided evidence and the interviews by the audit team.

AENOR deems that the project possesses and is maintaining the key technical and management skills required and the financial health of the PP is adequate to its successful implementation.

4.3.11 Commercially Sensitive Information (*Rules* 3.5.13 – 3.5.14)

The TIST financial plan and the individual carbon credit sale agreements signed are considered commercially sensitive and are not publicly available. AENOR has checked the information and is able to confirm that it meets the VCS Program definition of commercially sensitive information and that it is not related to the determination of the baseline scenario, demonstration of additionality, and estimation and monitoring of GHG emission reductions and removals of the project.

4.3.12 Rights Protection and Free, Prior and Informed Consent (G5.1-G5.5)

The project is developed on private lands owned by the TIST members that joined the program freely. As part of the GHG contract agreement, Small Group members attest their ownership and/or right to use the land where they plant trees.

The Free, Prior, and Informed Consent has been obtained of those whose property rights are affected by the project through a transparent, agreed process. Appropriate restitution or compensation has been allocated to any parties whose lands have been or will be affected, by the project. By contract, they receive an advanced carbon payment (tree payment), 70% of the profits from the sale of their carbon and all the tree products. They keep the trees and land and any other benefits that they derive from membership. The audit team reviewed the contracts of the interviewed TIST members (section 2.4) and cross-check the information with each of the signatories and found the information to be correct.

The project does not encroach uninvited on private property, community property, or Government property and does not require or involve the involuntary relocation of people or of activities important for their livelihoods or culture.

According to information provided in the MR and gathered from authorities and the PP, AENOR can confirm that the project protects the rights of indigenous peoples, communities, and other stakeholders in accordance with the Climate, Community & Biodiversity Standards and the validated project design.

4.3.13 Legal Status (G5.6)

The MR lists all the relevant national and local laws and regulations in section 2.5.6. Evidence of its fulfilment is considered complete. The PP has demonstrated that there are no project areas with eucalyptus planted in lands falling under the classification of riparian lands. AENOR did not detect during the verification process any incompliances related to laws and regulations.

4.4 Climate

4.4.1 Accuracy of GHG Emission Reduction and Removal Calculations

Procedures for quantifying the GHG emission removals were conducted in accordance with the CDM methodology AR-AMS0007 Version 3.1. The verification team performed an intensive review of all input data, parameters, formulas, calculations, conversions, statistics and resulting uncertainties and output data to ensure consistency with the VCS documentation, methodology and associated tools, and the PD. Further, the verification team reproduced calculations for selected samples to ensure accuracy of the results. Conversion factors, formulas, and calculations were provided by the PP in spreadsheet format to ensure all formulas were accessible for review. The verification team recalculated subsets of the analysis

to confirm correctness. Where applicable, references for analysis methods or default values were checked against relevant scientific literature for best practice.

Baseline emissions and removals

In accordance with the conditions of the validated baseline and the methodology AR-AMS0007, the carbon stock and change in carbon stock in the baseline can be accounted as zero.

Project Emissions

The emissions caused by the project are considered zero. As stated in the validated PD, this is due to the manner in which the project is operated, such as: no vehicles, manual labor conducted by the small-hold farmers on their own land, restrictions on chemical fertilizers, no clearing of baseline trees and minimal disturbance of the ground for planting.

Project Removals

Calculation of removals from project activities has been determined following the monitoring plan in the methodology and the validated PD.

According to data provided for the monitoring period, the emissions removals due to the project activities in the project area were **24,560 tCO_2e**.

Calculations and monitoring database files were provided to AENOR. A complete description of the process, assumptions and assessments carried out by proponents is provided in the MR.

Leakage

In accordance with the validated PD and the AR-TOOL15 “Estimation of the increase in GHG emissions attributable to displacement of pre-project agricultural activities in A/R CDM project activity”, leakage is to be considered as zero.

Net GHG Emission Reductions and Removals

Calculation of emission removals has been provided. The audit team has found the calculation traceable and in accordance with the applied methodology.

The following table summarizes the estimated baseline, project and leakage and the estimated net GHG emission reductions and removals.

Year	Baseline emissions or removals (tCO_2e)	Project emissions or removals (tCO_2e)	Leakage emissions (tCO_2e)	Net GHG emission reductions or removals (tCO_2e)
2015-2020	0	24,560	0	24,560
Total	**0**	**24,560**	**0**	**24,560**

Therefore, the project achieved a net GHG emission reductions and removals of **24,560 tCO_2e** during the current monitoring period.

Finally, VCUs are calculated by removing the buffer credits. The non-permanence risk rating for this project is 10%. Therefore, during this monitoring period (01-February-2015 to 01-February-2020), the project generated **22,104 VCUs for issuance and 2,456 buffer credits.**

AENOR reproduced the calculations to achieve the same results and deems they are depicted clearly and correctly in the provided sheets. The AENOR verification team was able to trace them directly from the data sources. Formulae used are in compliance with monitoring plan, PD, 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 (Appendix 1).

AENOR carried out a deep review of the technical annex and the calculations and others provided by the PP that feed data values shown in the spreadsheet *KE Monitoring Data 20210310 V3* (see Appendix 1).

AENOR verified the consistency and accuracy of each parameter detailed in sections 3.1.1 and 3.1.2 of the MR by crosschecking the information with the information in sections 3.3.1 and 3.3.2 of the PD as well as checking values and reproducing the calculations in the calculation spreadsheets (see Appendix 1) 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. Other default values used are from sources well accredited and validated at validation stage.

AENOR verified the list of parameter available at validation reported in the MR and values applied (if applicable) or the references to the documents. The list is complete and in compliance with the methodology and the validated PD.

The data and parameters monitored and used to determine the emission removals of the project are also detailed in section 3.1.2 of the MR. AENOR verified that list is complete and in compliance with the applicable methodology and the PD. For each parameter, the references to the tables where they are used are provided.

The parameters monitored are the following: *Number of trees; DBH; Total CO_2*.

In order to verify the accuracy and consistency of parameters monitored and used to calculate the avoided emissions removals achieved for the monitoring period, the AENOR verification team reproduced table by table using the sequence established in the methodology, checking the correctness of the formulae applied and assumptions used, when applicable and that values used matched with data sources. At the same time, the verification team had to check the set of other spreadsheets (see Appendix 1) that feed the *KE Monitoring Data 20210310 V3* calculation spreadsheet and show data inputs for calculating the terms listed above. In addition, the whole set of spreadsheets are fed from other sources, like the TIST server database.

After a deep and thorough review and reproduction of calculations of calculation sheets and samples to the tracks to TIST server database, AENOR deems the parameters monitored and available at validation are correct, reliable and consistent. Information in the MR is in compliance with the PD, the calculations provided and the applicable methodology. Then, the results showed in the MR are reliable, consistent and accurate.

4.4.2 Quality of Evidence to Determine GHG Emission Reductions and Removals

The data and parameters used to determine GHG emission reductions and removals are listed in section 3.1 of the MR.

The PP has standardized data collection and processing through a SOP (TIST Quantifier Manual) that is implemented by TIST quantifiers, which are audited by the TIST Kenya staff. Quantifiers transmit the monitoring data via the Internet to the TIST website, where it is managed by CAAC (the PP). The PP oversees the data and conducts QA/QC reviews. Feedback is provided to the TIST's Quantifiers and office staff. CAAC staff is responsible for tabulating carbon stocks.

The TIST Data System stores all of the current and archived data. CAAC managers use customized reports to analyze the data and look for trends, missing data, or obvious errors. TIST managers visit selected project areas and observe quantifications and audits.

Several QA/QC procedures are in place, including regular training of quantifiers, staff audits, multiple quantifications, etc. A precision level within of ±10% of the mean at a 95% confidence level was achieved during the monitoring period.

AENOR has verified that the monitoring plan is being implemented as the described in the PD. 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.

Roles and responsibilities along with data management and archival system are also detailed in the monitoring report and other supported documents.

Interviews with the project staff and inspection of data and results demonstrated that the PP possess all of the competencies required for reporting of GHG emissions removals on accurate way.

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 v4.0 Section 3.2.9 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: It is assessed using table 1 of the VCS AFOLU Risk Tool.	-2 (total may be less than zero)	a) The only species that exceed 25% is *Grevillea robusta*. Grevillea was introduced in 1910 and is a well-established tree in Kenya. It is common in Kenya, was introduced and proven successful well before the establishment of TIST and its selection does not pose a risk to the project. Risk rating=0 is justified. b) Ongoing enforcement to prevent encroachment by outside actors is not required to protect stocks. The project areas are on lands owned by the Small Group members that plant the trees. Risk rating=0 is justified. c) The management team has extensive experience that exceeds 5 years in all areas. CAAC created TIST in 1999 and began tree planting in 2000. The management team has not changed in that time. Risk rating=0 is justified. d) Management team maintains a presence in-country and less than one travel day from project site. Risk rating=0 is justified. e) The management team has extensive experience in AFOLU project design and carbon accounting under the VCS program. Risk rating=-2 is justified. f) Not applicable
Financial viability: It is assessed using table 2 of the VCS AFOLU Risk Tool.	0 (total may not be less than zero)	a)-d) The project has already reached breakeven. Financial documentation demonstrating this was provided to the audit team. Risk rating=0 is justified. e)-h) The project has already reached breakeven. Financial documentation demonstrating this was provided to the audit team. Risk rating=0 is justified.

Risk factor	Risk Rating	Assessment
		i) The project has ongoing funding available and has been financially viable for 20 years. Financial documentation demonstrating this was provided to the audit team. Risk rating=-2 is justified.
Opportunity Cost: It is assessed using table 3 of the VCS AFOLU Risk Tool.	-2 (total may be less than zero)	a)-f) The majority of the baseline activity in the project areas is subsistence farming. Risk rating=0 is justified. g) Not applicable h) Project has contracts with each Small Group that extend beyond the length of the project crediting period. Risk rating=-2 is justified. j) Not applicable
Project Longevity: It is assessed using table 4 of the VCS AFOLU Risk Tool.	0 (total may not be less than zero)	a) Not applicable b) CAAC has GHG contracts with each Small Group in the PD wherein each member has formally committed for 60 years not to cut down their trees, except when implementing best practices (such as to improve growth) for agro-forestry developed by TIST Risk rating=0 is justified.
Total internal risk=0 (total may not be less than zero)		
External Risks		
Land Tenure and resources access/impact: It shall be assessed using table 6 of the Risk Tool.	0 (total may not be less than zero)	a) Control of project lands by project participants is clear and undisputed, either through a registered deed or by customary tenure. Risk rating=0 is justified. b) The land ownership and resource access/use rights are held by the same entities. Risk rating=0 is justified. c)-d) There are no disputes over land tenure or ownership of the project area in more than 5 % of the project area nor disputes over access/use rights (or overlapping rights). Risk rating=0 is justified. e) Not applicable. f) Each area is subject to a Small Group GHG contract that protects that carbon stocks over the length of the crediting period. Risk rating=-2 is justified. g) Not applicable.
Community engagement: It shall be assessed using table 7 of the Risk Tool.	-5 (total may be less than zero)	a) 100% of the households within the project area have been consulted. Risk rating=0 is justified. b) 100% of the households who are reliant on the project area have been consulted.

Risk factor	Risk Rating	Assessment
		Risk rating=0 is justified. c) The project generates net positive impacts on social and economic well-being of local communities is validated under the CCB Standards Risk rating=-5 is justified.
Political Risks: It shall be assessed using table 8 of the Risk Tool.	2 (total may not be less than zero)	a-e) Kenya presents a score of -0.57 according to the World Bank Institute´s Worldwide Governance Indicators. AENOR verified the value and reliability of source. Risk rating=4 is justified. f) Kenya is receiving funds from Forest Carbon Partnership for REDD Readiness. Risk rating=-2 is justified.
Total external risks=0 (Total may not be less than zero)		
Natural risks		
Fire Risk: It shall be assessed using table 10 of the Risk Tool.	LS*M=0.25	The likelihood of a natural fire is every 10 to less than 25 years, being insignificant to carbon stocks. The project is implementing significant fire mitigation activities. Thus LS= 1 is reasonable. Mitigation (M) measures: 0.25
Pest and disease outbreaks: It shall be assessed using table 10 of the Risk tool.	LS*M=0.25	The presence of an especially aggressive pest or disease could cause tree mortality that could affect some carbon loss. There are three species where a total loss would exceed 5% - eucalyptus, cypress and grevillea. Its 16th year with our any sign of pests for the project. The likelihood of any carbon loss is in the 10 to less than 25 years category. The project is implementing significant pest mitigation activities. Thus LS= 1 is reasonable. Mitigation (M) measures: 0.25
Extreme weather: It shall be assessed using table 10 of the Risk tool.	LS*M=0.5	Cyclones, hurricanes and tornadoes are not relevant to TIST Kenya. Drought is the extreme weather that will have the most impact. Droughts tend to exert the greatest impacts during the early stages of tree establishment. Since TIST does not count trees younger than six months and considers one year old trees as having zero biomass, loss of these vulnerable trees will have no impact on carbon stocks. Based on previous verifications of seven previous TIST VCS projects, the 2-year-old trees represent less than 5% of the carbon stocks. Kenya has regular droughts; the likelihood is less than every 10 years. Thus LS= 2 is reasonable. The project is implementing significant drought mitigation activities. Mitigation (M) measures: 0.25.
Geological risks: It shall be assessed	LS*M=0	The project is exposed to little if any geological risks.

Risk factor	Risk Rating	Assessment
using table 10 of the Risk Tool.		There have been no earthquakes in the Mt Kenya area in recent history. Thus LS= 0 is reasonable. Mitigation (M) measures: Not applicable
Total natural risks=1		
OVERALL RISK RATING=0+0+1=1. Then an overall risk rating of 10% is considered.		

AENOR has checked that information provided in the NPRR for the monitoring period is consistent with supporting documents provided. The assumptions and justifications provided to determine the risk rating of each risk factor are elaborated and they are based on provided documents using conservative assessments. AENOR deems that information provided is reliable and appropriate from reliable sources, thus, the overall risk rating is credible and realistic. Thus, the overall risk rating of 10% is credible and realistic.

4.4.4 Dissemination of Monitoring Plan and Results (CL4.2)

The data monitoring process is communicated to farmers prior to the entry into the program. As part of this entry, they agree to allow TIST representatives to come and collect data on their farms The PP will made all the project documentation available to the public on TIST website. Additionally, stakeholders will be informed by email of the publication of project reports both on TIST website and Verra registry. Also, results will be disseminated in cluster meetings and in the publication Mazingira Bora.

This was verified by the audit team during stakeholder interviews, in which interviewees confirmed that they were aware of the monitoring procedures and that the PP has already shared with them monitoring results on a regular basis.

4.4.5 Optional Gold Level: Climate Change Adaptation Measures (GL1.3)

According to the climate change scenarios described in the PD, the geographic region of the project zone is likely to exhibit various effects of climate change:

- Increase in droughts.
- Prevalence of wildfires.
- Irregular rainfall patterns
- High winds.

In the absence of the project, these impacts could have significant impact on the land-use scenario of project participants. High winds can damage buildings and harm agriculture, while contributing to erosion. Similarly, drought, fire, and unpredictable rainfall could potentially render agricultural land less productive.

The PP has design and is implementing a set of project activities that will contribute directly or indirectly to climate change adaptation. Section 3.3.1 of the MR lists these activities, their details, the achievements during the monitoring period and the adaptation benefits.

Due to the specific nature of the activities, their direct impacts and results are obvious. Furthermore, all the stakeholders asked by the audit team during the interviews were well aware of the adverse effects of climate change and the contribution of project activities to reduce these effects.

Based on the evidence and testimonies, it is the opinion of the audit team that the activities implemented by the project deliver the intended impacts on climate change adaptation.

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

According to the MR, several activities have been implemented to assist farmers in adapting to climate change impacts, including:

- Conservation farming trainings: TIST members are trained on climate resilient agricultural techniques.
- Tree planting: trees provide shade to cool farms, introduce new organic matter to restore soil, prevent erosion and landslides and can serve as windbreaks when planted near structures.
- Community organization: TIST farmers organize themselves in local and regional groups that share knowledge in monthly Cluster meetings. These meetings provide an opportunity for farmers to share experiences and find locally appropriate solutions to local issues.

Based on the evidence and testimonies, it is the opinion of the audit team that the activities implemented by the project deliver the intended impacts on climate change adaptation.

4.5 Community

4.5.1 Community Impacts (CM2.1)

The MR states in section 4.1.1 the community impacts achieved by the project during the monitoring period:

- Total payments to the community: TIST farmers, their families, and communities benefit directly from carbon payments of $289,739.67.

- Number of live trees planted by TIST Small Groups (fruit/nut/eucalyptus): 743,303 trees provide a suite of economic and social benefits to farmers.

- Number of people receiving ICT training: TIST trains 69 workers on data collection and entry, smartphone, and computer skills.

- Average economic benefits per farmer: TIST surveys indicate average economic benefits per farmer of $1,450.

- Percentage of women in leadership positions: 50% of leaders are women.

- Number of people accessing mobile money services: A minimum of 1,567 people accessed mobile money transfer through TIST.

- Number of people gaining healthcare: TIST provides healthcare for each of their 69 workers.

- Hectares of hillside planting: Trees on 56 hectares of hillsides prevent erosion and landslides.

- Riparian planting: Trees in 19 hectares of riparian zones protect waterways and prevent erosion.

- Number of person-training sessions on natural resource management practices: 248,719 person-training sessions for farmers in TIST to teach one another locally appropriate best practices for natural resource management.

- Number of community members with Greenhouse Gas (GHG) contracts signed with TIST: The signing of GHG contracts allows TIST farmers to participate in profit sharing through the sale of carbon offsets. Approximately 10,007 farmers benefited.

- Number of person-training sessions in climate change: 52,272 person-training sessions on climate change and use the TIST network to determine locally appropriate best practices.

- Number of person-training sessions on health, HIV/AIDS: 5,909 person-training sessions on HIV/AIDS, including care for HIV-positive people, destigmatization, and prevention.

- Number of person-training sessions on tree planting, biodiversity: 72,854 person-training sessions for farmers to receive and share knowledge about locally appropriate trees and crops.

- Number of trainings on TIST practices: 202,581 person-training sessions which contribute to more productive agricultural and farming activities.

- Number of trainings on other sustainable development practices: 64,043 person-training sessions on a range of SDGs from water quality to sanitation

All impacts were confirmed by the interviewed stakeholders and verified with records. In the opinion of AENOR, the assessment of impacts is accurate and reflects faithfully the project benefits on communities.

4.5.2 Negative Community Impact Mitigation (CM2.2)

As the project take place in privately owned lands and the participation is voluntary, there are minimal threats caused by the project to local stakeholders. Two potential negative impacts have been identified and measures to mitigate them have been developed and implemented:

- Women or men experience harassment or discrimination: TIST often operates in communities that have strongly enforced cultural normativity. The program requires equality of access and opportunity regardless of age and gender, oftentimes in contradiction to cultural norms. As such, TIST identifies the potential threat of discrimination or harassment in response to this program attribute. In order to mitigate this threat, TIST conducts regular seminars where they review sexual harassment and discrimination. The program further has defined sexual harassment and discrimination policies which are publicly available and reviewed at meetings. Members who are found to have violated these policies are removed from TIST as either participants or employees.

- Occupation risks of TIST employees: Quantifiers are often tasked with visiting remote areas and navigating difficult terrain in order to locate and quantify tree growth. This presents a threat that would not exist in the absence of the program. In order to mitigate this threat, the program outlines

a list of precautions and requirements for Quantifiers in the Quantifiers' Safety Requirements. This document is publicly accessible and reviewed annually by each Quantifier.

As for the impacts to the HCVs, the PP states that the planting of trees have a direct benefit on their health. The monitoring of riparian and hillside planting in the project areas nearby to HCVs have a particular impact on the health of HCVs whose hillsides abut project areas or whose waterways traverse project areas. The reduction of pressure for forest products will further improve the HCV's viability.

The audit team verified this information during the interviews. None of the interviewees declared to have been subjected to any kind of harassment nor discrimination due to their participation in the project. The quantifiers interviewed were well aware of the risk associated to their daily activities and the safety measures to prevent them. Finally, when asked about HCV, all farmers declared that thanks to the trees planted by the project, their demand of timber and fuel has been covered and that they have no more need to collect firewood outside their own lands.

Therefore, it is the opinion of AENOR that the PP has adequately identified the potential negative impacts to the community well-being and has developed the adequate measures to mitigate them in an effective manner.

4.5.3 Net Positive Community Well-being (CM2.3)

The interviews with TIST members demonstrated that the participating communities are receiving benefits they would not otherwise have received in the absence of the project. Jobs have created and direct income opportunities have been made available and have included the poorest people and women. All evidence indicates that net impact of project activities on community groups is positive.

4.5.4 Protection of High Conservation Values (CM2.4)

According to the HCV assessment done by the PP, the project will not have a negative effect on the HCV areas. The project takes place on private lands that have been under human habitation and agriculture for generations. The planting of trees for the program will not cause displacement or move activities to the HCV areas.

4.5.5 Other Stakeholder Impacts (CM3.2-CM3.3)

The identified negative impact to other stakeholders is the threat that eucalyptus trees pose to degrade water tables. A waterway or water table damaged by eucalyptus on a TIST farm might have impacts on neighbors or those downstream.

In order to reduce the number of eucalyptus trees, TIST has trained farmers about the negative impacts of eucalyptus trees. In addition, TIST has had special programs in riparian areas to encourage the replacement of eucalyptus trees with indigenous alternatives.

Several positive impacts have been identified for other stakeholders, such as improved food security, best-practices spill over and increased offer of locally sourced sustainable fuelwood.

Assessment by the audit team concluded that the likelihood of net negative impacts on the well-being of other stakeholder groups is adequately addressed in the MR. In the opinion of AENOR, the claim of net

positive other stakeholder well-being impacts during the monitoring period is supported by evidence, is credible and reflects faithfully the project benefits on these communities. According to AENOR observations, the net impacts of the project activities are positive for each stakeholder group.

4.5.6 Community Monitoring Plan (CM4.1, CM4.2, GL2.2, GL2.3, GL2.5)

A plan for monitoring community was developed early in the project lifetime and successfully validated. Community monitoring plan, including the indicator or parameter monitored, the data collection method, monitored impacts, frequency of monitoring and results of the most recent monitoring, is included in section 4.3. of the MR. Through document review AENOR confirmed the monitoring plan is in place and monitoring is going on.

The PP has demonstrated that monitoring has been able to identify positive and negative impacts on the more vulnerable people in the communities. Regular communication is kept between project staff and community stakeholder as to get feedback regarding their attitudes and expectations toward the project and other aspects of life in the community.

AENOR confirms dates, frequency and sampling methods used are in accordance with the validated PD and with the procedures and systematics used in the verification event. AENOR confirms that community monitoring plan is implemented as the monitoring report and the validated PD.

4.5.7 Community Monitoring Plan Dissemination (CM4.3)

The data monitoring process is communicated to farmers prior to the entry into the program. As part of this entry, they agree to allow TIST representatives to come and collect data on their farms. The PP will make all the project documentation available to the public on TIST website. Additionally, stakeholders will be informed by email of the publication of project reports both on TIST website and Verra registry. Also, results will be disseminated in cluster meetings and in the publication Mazingira Bora.

This was verified by the audit team during stakeholder interviews, in which interviewees confirmed that they were aware of the monitoring procedures and that the PP has already shared with them monitoring results on a regular basis.

4.5.8 Optional Gold Level: Short-term and Long-term Community Benefits (GL2.2)

Community benefits are generated before members formally join TIST. During the registration and application stage, farmers are invited to attend Cluster meetings where they are able to receive training and education on issues that are important to them. After concluding the process, farmers sign contracts to share in the program's profits for 60 years.

Once farmers have planted trees, they receive a carbon pre-payment starting at six months. These prepayments serve as a bridge until their carbon stock is verified. At this point, they are able to share in 70% of the program's profits. Tree planting has short and long-term economic and environmental benefits. The planting of trees can create fruit, nut, and medicinal harvests for farmers. Trees can further provide deadfall, fuelwood, windbreaks, and improved soil quality.

The benefits from education on health issues, improved agricultural practices, improved cookstove construction, and leadership development will last the whole lifetime of the project.

The farmers interviewed by the audit team confirmed that benefits are already being delivered and that they have gain knowledge (tree planting, conservation farming, nursery creation, improved cookstove building) that will benefit them even in the case of discontinuation of the project. Thus, AENOR deems that the project generates short-term and long-term net positive well-being benefits for smallholders/community members in accordance with the requirements of the CCB Standard.

4.5.9 Optional Gold Level: Smallholder/community member Risks (GL2.3)

The project does not demand membership but rather relies on farmer's actively seeking to join. The potential costs, risks, and benefits are best articulated by farmers who are currently participating in the project. To join TIST, farmers must complete a lengthy application process which includes attending meetings to learn about benefits and costs. In order to be accepted into the project, farmers must attend training sessions on each element of the program.

Measures taken to prevent any risk for the community members to participate are the following:

- There is no change in the land use and legal property rights in the project zone.
- Unlike in traditional cash crop programs, farmers are not changing the productive use of their arable land. Rather, TIST farmers are planting trees using agroforestry methods in conjunction with their extant activities. Tree planting often occurs on property boundaries, around homesteads, or between rows of crops.
- Existing property rights are recognized, respected, and supported.
- The project does not encroach uninvited on private, community or government property.
- The free, prior, and informed consent has been obtained of those whose property rights are affected by the project.
- Project activities do not lead to the involuntary removal or relocation or property rights holders from their lands or territories and does not force them to relocate activities important to their culture or livelihood.
- Actions have been taken, if necessary, to reduce illegal activities that could affect the project's impacts.
- No activities are undertaken by the project that could prejudice the outcome of an unresolved dispute relevant to the project over lands, territories, and resources in the project zone.

AENOR deems correct the assessment of the PP regarding the current lack of risks to community members to participate in the project and consider that the measures listed above will be effective in mitigating any risk related to related to trade-offs with food security, land loss, loss of yields and short-term and long-term climate change adaptation that might arise in the future.

4.5.10 Optional Gold Level: Marginalized and/or Vulnerable Community Groups (GL2.4)

The project has been able to demonstrate that measures have been taken to ensure that vulnerable and/or marginalized groups were able to participate in the development of activities and benefit from them. To join the project, a farmer only needs to join a Small Group. There is no minimum project area size that would restrict the smallest small-holder farmer from joining. Members do not have to buy seedlings. They are taught to gather local seeds, prepare nurseries and raise their own seedlings. They can sell any surplus. The benefits that can be realized by using Conservation Farming not only don't cost money, but they can also produce higher yields in less land and result in added revenues or decreased food expenses. Participation in the more fuel-efficient stove project is also without cost, as well as any other training delivered by the project.

The project was designed to benefit the poorest of the poor. While all in the poorest are invited to join and would reap more benefits as members, all of the project activities have community benefits that will benefit even the non-members.

The project concept was developed through visioning sessions with poor small-hold subsistence farmers in Tanzania in 1998 and 1999. They expressed deep concern about recurrent famine, poor crops, lack of shade and firewood, declining rainfall, declining soil fertility, poor access to water for personal and agricultural use, poor diet, regular health problems including AIDS and malaria, lack of economic opportunity, poor cattle forage on eroded lands, and the decline of wildlife due to over hunting and lack of forests. The Small Group seminar, however, did not stop with identifying the local problems; participants established the goals of starting hundreds of Small Groups to plant trees, reduce poverty, improve health, and prevent famine. TIST Kenya adopted this approach and was designed to do as much of this as possible at the subsistence farmer level. Because this was the approach to the project, no poorer and more vulnerable households, and individuals whose well-being or poverty may be negatively affected by the project have been identified.

Based on the evidence provided and gathered by the audit team, it is the opinion of AENOR that the project generates net positive impacts on the well-being of all identified marginalized and vulnerable groups, securing their access to the benefits, and that it has properly identified and avoided any negative impacts on poorer and more vulnerable households.

4.5.11 Optional Gold Level: Net Impacts on Women (GL2.5)

According to the information provided on the MR, of the 10,007 TIST members of the project 3,621 (36%) are women and the received the same benefits from the project, in terms of direct payments and capacitation, as men. In addition, 50% of TIST farmers on the Leadership Council and of 40 of 69 TIST workers are women.

AENOR deems that the project generates net positive impacts on the well-being of women and that women participate in or influence decision making. No specific negative impacts are discrimination were declared by women during the interviews of the audit process when ask about the subject.

4.5.12 Optional Gold Level: Benefit Sharing Mechanisms (GL2.6)

The TIST members received an advanced cash payment and a 70% share of profits from carbon revenues based on tree count of their groves. In addition, they are provided with training and capacitation on a wide range of issues for free.

AENOR, based on the review of the singed GHG contracts and the declarations of the interviewed TIST members, finds this information to be accurate.

4.5.13 Optional Gold Level: Governance and Implementation Structures (GL2.8)

The project is overseen by the Cluster Leaders and Cluster Servants. These positions are covered by people selected among the TIST farmers. Much of the major decision-making is at the farm level, by the farmers. They own the land where the trees are planted, the trees and the tree products. The choose where to plant, how many trees to plant, which species to plant, which sustainable development activities to pursue, etc. TIST provides them with training to help them in their decision-making process, but they are the ones that make the final decision.

AENOR interviewed TIST members, quantifiers and members of the Leadership Council and could check that project's governance and implementation structures enable full and effective participation of smallholders and community members in project decision-making and implementation.

4.5.14 Optional Gold Level: Smallholders/Community Members Capacity Development (GL2.9)

The project relies on local membership and a locally trained staff. The TIST Small Group and Cluster structure was designed to provide training and capacity building for thousands of subsistence farmers. This information was verified by reviewing training records and through the statements of the TIST members interviewed.

4.6 Biodiversity

4.6.1 Biodiversity Changes (B2.1)

The MR states in section 5.1.1 the biodiversity changes achieved by the project during the monitoring period. The reported trends are the following:

- Number of indigenous trees: 183,016 indigenous trees planted.
- Hectares of indigenous trees: 649.9 hectares of indigenous trees.
- Number of trees planted: 743,303 trees.
- Endangered/Vulnerable/Threatened Species planted: 1.
- HCVs impacted: 2 HCVs through tree planting.
- Hectares of Riparian planting: TIST farmers reforesting 19 hectares of land around rivers protects waterways and ecosystems.

- Hectares of hillside planting: TIST farmers reforesting 56 hectares of land on hillsides prevents erosion and protects ecosystems.

In the opinion of AENOR, information about benefits on biodiversity from project activities is accurate since is based on records taken by TIST quantifiers in a regular basis, and the attribution of biodiversity changes to the project's activities is well justified.

4.6.2 Mitigation Actions (B2.3)

Damage to water tables caused by planting of eucalyptus trees nearby to waterways was identified as the only potential negative impact of the project on biodiversity. In order to reduce the number of eucalyptus trees, the PP has trained farmers about the negative impacts of eucalyptus trees. In addition, the PP has had special programs in riparian areas to encourage the replacement of eucalyptus trees with indigenous alternatives.

The audit team has confirmed the lower number of eucalyptus trees planted in the project, which represent less than 5% of the total trees planted. During the interviews, all farmers demonstrated to be aware of the negative effects of eucalyptus and declared to give preference to the planting indigenous and fruit trees over them. The Kenya Forest Service officer declared to work in collaboration with the PP in providing advice to farmers on which trees to plant depending on the specific conditions of their lands.

Based on these evidence, it is the opinion of AENOR that the PP has developed and is implementing the adequate measures to mitigate the negative impacts on biodiversity in an effective manner.

4.6.3 Net Positive Biodiversity Impacts (B2.2)

None of the tree planting would take place in absence of the project. This was confirmed by all the interviewed farmers by the audit team. TIST members plant both indigenous and non-indigenous trees. The first represent a direct net positive biodiversity impact in comparison to the without project scenario, which means that the project areas remain treeless. As for non-indigenous trees, they too have a net biodiversity benefit. The non-native trees such as eucalyptus, cypress and grevillea provide a sustainable source of fuelwood, and by doing so, reduce deforestation and indirectly contribute to biodiversity. The "without project" scenario would mean more pressure on the natural forests and more loss of biodiversity. Therefore, even looking at the project from the vantage of the non-native species, the project has a net biodiversity benefit when compared to the "without project" case.

The reforestation of certain project areas located in steep hillsides and riparian areas reduces the possibility for erosion and protect waterways. In the future, it is expected that the reforestation of project areas will provide wildlife corridors.

Also, promotion of Conservation Farming further reduces pressure on forest land by increasing food productivity by, and consequently decreasing pressure for, land clearing for agriculture.

Project activities assist biodiversity in adapting to the probable impacts of climate change. Tree planting itself creates microclimates on farms which increase flora viability. Shade and the retention of water provided by both indigenous and non-indigenous trees assists biodiversity in project areas. Tree planting prevents erosion caused by climate change impact such as increased winds and irregular rain patterns. By creating access to forest products outside of old growth forests, the project is mitigating the pressure for

human encroachment into forests, thereby rendering the forests more resilient to climatic threats. TIST woodlots not only serve as buffer zones to forests, but also as connective corridors. Providing access between forests and protected areas is likely to increase the capacity for migratory and threatened animals to move from one location to another in response to climatic impacts.

AENOR deems the project is having and going to have a positive net gain for biodiversity in the project area. The benefits provided by the project to biodiversity considerably outweigh any potential impact of eucalyptus trees on water tables. Thus, it is the opinion of AENOR that the project has net positive biodiversity impact. The audit team deems that the PP has demonstrated that project activities will assist the biodiversity to adapt to the probable impacts of climate change, as per GL1.4 of the CCB Standard v3.1.

4.6.4 High Conservation Values Protected (B2.4)

There are no HCV within the project areas. All reforestation activities take place on degraded agricultural lands own by the TIST members. Outside the project areas two HCV have been identified: Mount Kenya National Park and Aberdare National Park.

The planting of trees for the program will not cause displacement or move activities to the HCV areas. On the contrary, the fuelwood provided by the planted groves will reduce the pressure on the natural forests. Additionally, the increase in indigenous trees, tree cover and fruit trees as result of the project activities enhance biodiversity by providing an expanded range for some of the animals that habit on the HCV areas.

Based on the evidence provided by the PP and the opinion of the stakeholders consulted by the audit team, AENOR deems that no HCV is negatively affected by the project. Furthermore, the project is actively contributing on the protection of these HCVs.

4.6.5 Invasive Species (B2.5)

The project only uses indigenous and naturalized species that do not pose any risk of becoming invasive. All listed species have been screened against the global database of invasive species and reviewed with the Kenya Forest Service. While two on the above list are included for Kenya, they are high value trees in Kenya, and, according to the Kenya Forest Service, are not invasive.

The audit team confirmed with the Kenya Forest Service officer that all the species used have been approved and that they provide advice to farmers on which are the best species to plan on their lands depending on their specific conditions. The officer also confirmed that none of the used species are considered as invasive by the Kenya Forest Service.

4.6.6 Impacts of Non-native Species (B2.6)

The PP does not provide seeds or seedlings, so the trees planted by TIST farmers are locally sourced from existing trees with a history of being grown in the country and region. They choose both indigenous and non-native species for their varied benefits. TIST farmers agree, as part of their contract, that trees that damage the environment will not be counted as TIST trees. Groups are trained on the benefits of alternative indigenous trees and how to grow these trees.

In the opinion of AENOR, the use of these non-native species is well justified and is common practice in Kenya and the Eastern Africa region and don't pose harm to the project area's environment and its surroundings.

4.6.7 GMO Exclusion (B2.7)

The monitoring report includes guarantee that no GMOs are used to generate GHG emission reductions or removals. AENOR believes this to be reasonable based on the project characteristics and goals.

4.6.8 Inputs Justification (B2.8)

No chemical fertilizers nor pesticides are used. Farmers are trained to make and use their own compost and to use dung.

4.6.9 Negative Offsite Biodiversity Impacts (B3.1) and Mitigation Actions (B3.2)

All reforestation project activities are implemented within private degraded lands. The specific project design, that is the freedom for farmers to choose the number, place, and species of trees to plant, as well as allowing the sustainable harvest of wood from fallen and pruned branches and thinned trees, prevents the displacement of pre project activities outside the project areas.

It is the opinion of AENOR that the PP has demonstrated that there are no potential negative offsite biodiversity impacts from the project.

4.6.10 Net Offsite Biodiversity Benefits (B3.3)

The project has demonstrated to have provided benefits in the form of increased firewood availability, increased crop yields, reduced fuel-wood consumption due to efficient cookstoves and improved biodiversity in the reforested groves. In addition, no negative impacts have been identified. Because of the project and its implemented project activities, the net effect of the project on biodiversity offsite the project zone is positive as it was demonstrated to AENOR.

4.6.11 Biodiversity Monitoring Plan (B4.1, B4.2, GL3.4)

A plan for biodiversity monitoring was developed early in the project lifetime and successfully validated. Through document review AENOR confirmed the monitoring plan is in place and monitoring is going on.

The PP has demonstrated that monitoring has been able to identify trends on the biodiversity, based on tree species planted. Surveys and inventories results were provided to verifiers.

AENOR confirms dates, frequency and sampling methods used are in accordance with the validated PD and with the procedures and systematics used in the verification event. AENOR confirms that biodiversity monitoring plan is implemented as the MR and the validated PD.

4.6.12 Biodiversity Monitoring Plan Dissemination (B4.3)

The data monitoring process is communicated to farmers prior to the entry into the program. As part of this entry, they agree to allow TIST representatives to come and collect data on their farms. The PP will make

all the project documentation available to the public on TIST website. Additionally, stakeholders will be informed by email of the publication of project reports both on TIST website and Verra registry. Also, results will be disseminated in cluster meetings and in the publication Mazingira Bora.

This was verified by the audit team during stakeholder interviews, in which interviewees confirmed that they were aware of the monitoring procedures and that the PP has already shared with them monitoring results on a regular basis.

4.6.13 Optional Gold Level: Trigger Species Population Trends (GL3.3)

Among the trees planted and conserved by the project is the Meru oak (*Vitex keniensis*), endemic of Kenya and listed as endangered on the IUCN Red List. Specifically, 4,378 Meru oaks have been planted and conserved in the project area since the project start.

4.6.14 Optional Gold Level: Effectiveness of Threat Reduction Actions (GL3.4)

The PP provides in the MR (section 5.4 Optional Criterion: Exceptional Biodiversity Benefits) evidence of proper identification of this trigger species, in order to prove that the qualifying conditions are met as well as the positive trend in this species population, referred to the without-project land use scenario and/or earlier stages of the project.

In the opinion of AENOR, through document revision and stakeholder consultations, measures implemented on site are adequate to maintain or enhance the population status of this trigger species in the project zone and to reduce the threats to it. The monitoring system includes indicators of these trends and demonstrates the effectiveness of measures. Thus, AENOR confirms the project complies with requirements for Biodiversity Gold Level status under the CCB standard.

4.7 Additional Project Implementation Information

There is no additional information.

4.8 Additional Project Impact Information

There is no additional information.

5 VERIFICATION CONCLUSION

After review of all project information, procedures, calculations, and supporting documentation and the interview process, AENOR confirms that the monitoring conducted by the Project Proponent, along with the supporting Monitoring & Implementation Report, are accurate and consistent with all aforementioned VCS Version 4 and CCB Third Edition criteria, the validated PD, and the selected methodology (CDM AR-AMS0007 Version 3.1). AENOR confirms that the project TIST Program in Kenya, VCS-CCB 010, Monitoring & Implementation Report (Version 4 dated 26 February 2021) has been implemented in accordance with the validated PD.

AENOR confirms all verification activities, including objectives, scope and criteria, level of assurance, monitoring and project documentation adherence to VCS Version 4 (and all associated updates), and CCB Project Design Standards Third Edition, as documented in this report are complete. AENOR concludes

without any qualifications or limiting conditions that the project TIST Program in Kenya, VCS-CCB 010 meets the requirements of VCS Version 4 (and all associated updates) and CCB Standards Third Edition for the monitoring period (01-February-2015 to 01-February-2020).

The project is achieving the climate, community, and biodiversity benefits, including Gold Level Climate Change Adaptation Benefits, Gold Level Exceptional Community Benefits and Gold Level Exceptional Biodiversity Benefits as described in the Monitoring & Implementation Report.

The GHG assertion provided by the project proponent and verified by AENOR has resulted in a total net GHG Emission Removals of 24,560 tCO_2e by the project during the monitoring period (01-February-2015 to 01-February-2020). Considering 10% of buffer withholding based on the VCS Non-Permanence Risk Assessment Tool v4.0, which means a buffer allocation of 2,456 tCO_2e, the Verified Carbon Units (VCU) to be issued are 22,104 tCO_2e.

For this period there is no release of buffer credits following VCS Registration and Issuance Process Document 19 September 2019, v4.0.

Verification/monitoring period: From 01-February-2015 to 01-February-2020.

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

Year	Baseline emissions or removals (tCO_2e)	Project emissions or removals (tCO_2e)	Leakage emissions (tCO_2e)	Net GHG emission reductions or removals (tCO_2e)
2015-2020	0	24,560	0	24,560
Total	**0**	**24,560**	**0**	**24,560**

Overall non-permanence risk rating: 10%

VCUs buffer to be deposited: 2,456 tCO_2e.

Total VCUs to be issued: 22,104 tCO_2e.

Year	Net GHG emission reductions or removals (tCO2e)	Buffer pool allocation	VCUs eligible for issuance
2015-2020	24,560	2,456	22,104
Total	**24,560**	**2,456**	**22,104**

Madrid, 07 September 2021



Juan Carlos Gómez
Lead auditor

APPENDIX 1: List of Evidence Provided

General documents
Monitoring Report: - Final version: MR Kenya 010 VCS + CCB 20210713 V6 - MR Kenya 010 VCS + CCB 20210210 V3 - Kenya 010 VCS + CCB MR 20201113 V2 Project Description: - TIST KE PD-VCS-010a VCS-CCB PD Text 210226 V7 Non-Permanence Risk Report: - Kenya 010 VCS Risk Report
Carbon accounting
- KE Validation Data 20210308 V3 - KE Monitoring Data 20210310 V3
Geospatial
- Kenya 010.kml
Exhibits
- Exhibit 01 TIST KE PD-VCS-005g App06 Geo Area of Groups (1) - Exhibit 02 KE Validation Data 20210308 V3 - Exhibit 03 Kenya 010.kml - Exhibit 04 Theory of Change - Exhibit 05 TIST KE SDG 20200213 - Exhibit 06 SDG Targets and Indicators - Exhibit 07 TIST KE PD-VCS-Risk Ver1 GhG Contract 050418/ TIST KE PD-VCS-Risk Ver1 GhG Contract 050418 - Exhibit 08 TIST Workers - Exhibit 09 U Exeter NDVI Presentation - Exhibit 10 TIST KE PD-CCB- YaleNEC Benefits Results/ TIST KE PD-VCS-Ex23 GL2 Community Survey Result - Exhibit 11 TIST KE Environmental Impact Report - Exhibit 12 TIST KE PD-CCB-Spt 16 Financial Plan - Exhibit 13 TIST KE PD-CCB-Spt 07 FAO Food Security - Exhibit 14 TIST KE PD-CCB UNEP Tree Benefits - Exhibit 15 TIST KE PD-CCB-Spt 11 UNEP KE Energy - Exhibit 16 KE Monitoring Data 20210310 V3 - Exhibit 17 Kenya Meetings Validation - Exhibit 18 East Africa Living Encyclopedia - Exhibit 19 2020.12.December.Mazingira Bora.6 Languages - Exhibit 20 2016.06.June.Mazingira Bora.6 Languages - Exhibit 21 TIST KE PD-VCS-Ex10 GPG-LULUCF 2003 Root-Shoot - Exhibit 30 Tree Planting SOPs - Exhibit 33 Grievance Policy - Exhibit 34 Sexual Harassment Exhibit 35 Non-Discrimination - Exhibit 36 TIST Intro FAQ Exhibit 37 TIST SG Eligibility Requirements - Exhibit 38 TIST SG Membership Application - Exhibit 39 TIST Values - Exhibit 40 Quantifier Manual
Oher documents
Sample of TIST members' contracts

APPENDIX 2: CORRECTIVE ACTIONS AND CLARIFICATIONS REQUESTS

VCS Corrective Action Requests (VCS CARs)

CAR ID	**01**	**Date: 15/02/2021**
Description		
Net GHG emissions and removals are incorrectly calculated. Baseline emission removals are being added instead of subtracted form project removals.		
Project proponent response		**Date: 26/02/2021**
MR Kenya 010 VCS+CCB 20210210 V3 section 3.2.4 column headers have been edited to correctly reflect “project” and “net” removals.		
Documentation provided by Project proponent		
MR Kenya 010 VCS+CCB 20210210 V3 section 3.2.4		
VVB Assessment		**Date: 08/03/2021**
Calculation of net GHG emissions removals still incorrect. Trees from project areas that are classified as baseline trees according to tab ‘Baseline Strata’ of the spreadsheet *KE Validation Data 20210215 V2* and that were used to estimated baseline removals are also used to estimated project removals in tab ‘Ex-post Strata’ of *KE Monitoring Data 20210215 V2.* Therefore, the carbon removals determined in tab ‘Ex-post Strata’ should be considered as project removals (gross removals) and baseline removals should be subtracted from to determine net GHG removals. **CAR still open.**		
Project proponent response		**Date: 11/03/2021**
Incorrectly assessed baseline trees have been removed from tab ‘Baseline Strata’ of the spreadsheet *KE Validation Data 20210308 V3*. Baseline and project trees are now completely separated. Baseline removals are ex-ante projections based on monitoring done at the time of baselining. Ex-post calculations in tab ‘Ex-post Strata’ of *KE Monitoring Data 20210308 V3* now exclusively rely on project trees.		
Documentation provided by Project proponent		
Ex-post Strata’ of *KE Monitoring Data 20210308 V3* Baseline Strata of *KE Validation Data 20210308 V3* MR Kenya 010 VCS+CCB 20210310 V4 section 3.2.4		
VVB Assessment		**Date: 17/03/2021**
The PP has made the adequate corrections. **CAR closed.**		

VCS Clarification Requests (VCS CLs)

VCS CL ID	**01**	**Date: 15/02/2021**
Description		
In section 2.1.1, as required by the template, provide the following information for the monitoring period: • *Describe how leakage and non-permanence risk factors are being monitored and managed.* • *The total GHG emission reductions or removals generated in this monitoring period.*		
Project proponent response		**Date: 26/02/2021**
MR Kenya 010 VCS+CCB 20210210 V3 section 2.1.1 has been updated to provide information on leakage and non-permeance risk factors and total GHG emission removals.		
Documentation provided by Project proponent		
MR Kenya 010 VCS+CCB 20210210 V3 section 2.1.1		
VVB Assessment		**Date: 08/03/2021**
The PP has provided the requested information. **CL closed.**		

VCS CL ID	**02**	**Date: 15/02/2021**
Description		
In section 3.2.1, as required by the template, quantify the baseline emissions and/or removals, providing sufficient information to allow the reader to reproduce the calculation.		
Project proponent response		**Date: 26/02/2021**
MR Kenya 010 VCS+CCB 20210210 V3 section 3.2.1 has been edited to include the calculations for calculating baseline removals and provide reference to the corresponding exhibits.		
Documentation provided by Project proponent		
MR Kenya 010 VCS+CCB 20210210 V3 section 3.2.1		
VVB Assessment		**Date: 08/03/2021**
The PP has provided the requested information. **CL closed.**		

VCS CL ID	**03**	**Date: 15/02/2021**
Description		
In section 3.2.4 Net GHG Emission Reductions and Removals, as required by the template, state the non-permanence risk rating (as determined in the AFOLU non-permanence risk report) and calculate the total number of buffer credits that need to be deposited into the AFOLU pooled buffer account.		
Project proponent response		**Date: 26/02/2021**
MR Kenya 010 VCS+CCB 20210210 V3 sections 3.2.4 has been updated to reflect the buffer removals		
Documentation provided by Project proponent		
MR Kenya 010 VCS+CCB 20210210 V3 sections 3.2.4		
VVB Assessment		**Date: 08/03/2021**
The PP has provided the requested information. **CL closed.**		

CCB Corrective Action Requests (CCB CARs)

CCB CAR ID	**01**	**Date: 15/02/2021**
Description		
Section 2.2.5 of the MR does not follow the last available version of the MR template.		
Project proponent response		**Date: 26/02/2021**
MR Kenya 010 VCS+CCB 20210210 V3 section 2.2.5 has been updated to reflect the last available MR template		
Documentation provided by Project proponent		
MR Kenya 010 VCS+CCB 20210210 V3 section 2.2.5		
VVB Assessment		**Date: 08/03/2021**
The PP has made the adequate corrections. **CAR closed.**		

CCB CAR ID	**02**	**Date: 15/02/2021**
Description		
Throughout the MR the species *Zanthoxylum gilletii* is considered as trigger species and identified as endangered or vulnerable. However, t is classified as Least Concern (LC) by the IUCN Red List.		
Project proponent response		**Date: 26/02/2021**
Reference to *Zanthoxylum gilletii* has been removed as a trigger species in sections 5.1.1 and 5.4.1		
Documentation provided by Project proponent		
MR Kenya 010 VCS+CCB 20210210 V3 sections 5.1.1 and 5.4.1		
VVB Assessment		**Date: 08/03/2021**
The PP has made the adequate corrections. **CAR closed.**		

CCB Clarification Requests (CCB CLs)

CCB CL ID	**01**	**Date: 15/02/2021**
Description		

Provide GHG agreements of the following project areas:

Proj Area ID	Loc ID	Group ID	Center	Group Num	Grove Name	TISTNum
2016KE68-Samuel kihara	160591	18631	tharak	366	Samuel kihara	2016KE68
2016KE459-Julias gachema - farm	165888	19120	NaroMo	1071	Julias gachema - farm	2016KE459
2017KE227-John mati	166175	19653	Kmaara	1307	John mati	2017KE227
2017KE160-Mary gathigia kagotho	169473	19581	NaroMo	1075	Mary gathigia kagotho	2017KE160
2017KE484-Amendeo Mbaya	169277	19979	Kithur	316	Amendeo Mbaya	2017KE484
2012KE258-Gladys muturi	171173	15398	Laikip	478	Gladys muturi	2012KE258
2018KE276-David mutugi	171882	20840	Meru3	40	David mutugi	2018KE276
2018KE343-Partric kirimi mutuera	172901	20990	Kithur	410	Partric kirimi mutuera	2018KE343
2018KE256-Agnes k	172934	20802	Kithur	398	Agnes k	2018KE256
2016KE113-Susan ndunge ndeto	176168	18678	tharak	391	Susan ndunge ndeto	2016KE113

Project proponent response	**Date: 08/03/2021**
GHG contracts provided via email.	
Documentation provided by Project proponent	
GHG contracts provided via 8/3/2021 email	
VVB Assessment	**Date: 13/03/2021**
The PP has provided the requested documents. **CL closed.**	

CCB CL ID	**02**	**Date: 15/02/2021**
Description		
As required by the temple and section G3.1 of the CCB Standards, v3.1 describe how the informational meetings are publicized in section 2.3.3 of the MR.		
Project proponent response		**Date: 26/02/2021**
MR Kenya 010 VCS+CCB 20210210 V3 section 2.3.3 has been updated to include a description of how informational meetings are publicized.		
Documentation provided by Project proponent		
MR Kenya 010 VCS+CCB 20210210 V3 section 2.3.3		
VVB Assessment		**Date: 08/03/2021**
The PP has provided the requested information. **CL closed.**		

CCB CL ID	**03**	**Date: 15/02/2021**
Description		
According to section 2.3.4 the training process that educates farmers on the activities and structure of TIST, through participation in Cluster meetings and training sessions, takes place after they have completed an application and registration process. Section G3.2 of the CCB Standards, v3.1 states: Explain how relevant and adequate information about potential costs, risks and benefits to communities has been provided to them in a form they understand and in a timely manner prior to any decision they may be asked to make with respect to participation in the project. Provide information on how the farmers are informed about potential costs, risks and benefits before registering with the project.		
Project proponent response		**Date: 26/02/2021**
MR Kenya 010 VCS+CCB 20210210 V3 section 2.3.4 has been edited for clarity. The training referenced in this section is part of the application and registration process and occurs prior to a participant joining the program.		
Documentation provided by Project proponent		
MR Kenya 010 VCS+CCB 20210210 V3 section 2.3.4		
VVB Assessment		**Date: 08/03/2021**
The PP has provided the requested information. **CL closed.**		

CCB CL ID	**04**	**Date: 15/02/2021**
Description		
In section 2.3.7, as required by G3.3 and the template, describe how communities and other stakeholders have influenced project design. Provide evidence of these consultations.		
Project proponent response		**Date: 26/02/2021**
MR Kenya 010 VCS+CCB 20210210 V3 section 2.3.7 has been edited to describe how communities have influenced project design		
Documentation provided by Project proponent		
MR Kenya 010 VCS+CCB 20210210 V3 section 2.3.7		
VVB Assessment		**Date: 08/03/2021**
The PP has provided the requested information. **CL closed.**		

CCB CL ID	**05**	**Date: 15/02/2021**
Description		
In section 2.4.1, as required by G4.2 and the template, document the maintenance of the key technical skills required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills.		
Project proponent response		**Date: 26/02/2021**
MR Kenya 010 VCS+CCB 20210210 V3 section 2.4.1 has been updated with a discussion of the maintenance of key technical skills		
Documentation provided by Project proponent		
MR Kenya 010 VCS+CCB 20210210 V3 section 2.4.1		
VVB Assessment		**Date: 08/03/2021**
The PP has provided the requested information. **CL closed.**		

CCB CL ID	**06**	**Date: 15/02/2021**
Description		
In section 4.1.2, as required by CM2.2 and the template, describe measures needed and taken for maintenance or enhancement of the high conservation value attributes.		
Project proponent response		**Date: 26/02/2021**
MR Kenya 010 VCS+CCB 20210210 V3 section 4.1.2 has been updated to describe these measures.		
Documentation provided by Project proponent		
MR Kenya 010 VCS+CCB 20210210 V3 section 4.1.2		
VVB Assessment		**Date: 08/03/2021**
The PP has provided the requested information. **CL closed.**		

CCB CL ID	**07**	**Date: 15/02/2021**
Description		
As required by GL1.4 and the template for projects validated at the Gold Level for climate change adaptation benefits, demonstrate how the project activities have assisted communities to adapt to the probable impacts of climate change in section 4.1.3.		
Project proponent response		**Date: 26/02/2021**
MR Kenya 010 VCS+CCB 20210210 V3 section 4.1.3 has been updated to include specific project impacts that relate to the mitigation of climate change for project participants.		
Documentation provided by Project proponent		
MR Kenya 010 VCS+CCB 20210210 V3 section 4.1.3		
VVB Assessment		**Date: 08/03/2021**
The PP has provided the requested information. **CL closed.**		

CCB CL ID	**08**	**Date: 15/02/2021**
Description		
In section 4.4.3, as required by GL2.5 and the template, demonstrate that the project has generated net positive impacts on the well-being of women.		
Project proponent response		**Date: 26/02/2021**
MR Kenya 010 VCS+CCB 20210210 V3 section 4.4.3 has been updated to include a demonstration of net positive impacts on the well-being of women. A 2nd benefits survey has been added to Exhibit 10		
Documentation provided by Project proponent		
MR Kenya 010 VCS+CCB 20210210 V3 section 4.4.3 Exhibit 10		
VVB Assessment		**Date: 08/03/2021**
The PP has provided the requested information. **CL closed.**		

CCB CL ID	**09**	**Date: 15/02/2021**
Description		
As required by GL1.4 and the template for projects validated at the Gold Level for climate change adaptation benefits, demonstrate how the project activities assist the biodiversity to adapt to the probable impacts of climate change in section 5.1.3.		
Project proponent response		**Date: 26/02/2021**
MR Kenya 010 VCS+CCB 20210210 V3 section 5.1.3 has been updated to demonstrate how the project activities assist the biodiversity to adapt to the probable impacts of climate change		
Documentation provided by Project proponent		
MR Kenya 010 VCS+CCB 20210210 V3 section 5.1.3		
VVB Assessment		**Date: 08/03/2021**
The PP has provided the requested information. **CL closed.**		

CCB CL ID	**10**	**Date: 15/02/2021**
Description		
In section 5.1.6, as required by the template provide justification of use and potential adverse effect each non-native species used.		
Project proponent response		**Date: 26/02/2021**
MR Kenya 010 VCS+CCB 20210210 V3 section 5.1.6 has been updated in include a discussion of potential adverse effects. We have confirmed with VERRA that a table of species in the spreadsheet will suffice to meet this requirement. A “Non-Native Species List” tab has been added to KE Monitoring Data 20210215 V2		
Documentation provided by Project proponent		
KE Monitoring Data 20210215 V2 sheet “Non-Native Species List” MR Kenya 010 VCS+CCB 20210210 V3 section 5.1.6		
VVB Assessment		**Date: 08/03/2021**
The PP has provided the requested information. **CL closed.**		

CCB CL ID	**11**	**Date: 15/02/2021**
Description		
Provide the exhibits listed in the section Additional information.		
Project proponent response		**Date: 26/02/2021**
https://drive.google.com/drive/folders/15ec7wKzCTbaYNI2nybAtfDKRKg5dz7hk?usp=sharing		
Documentation provided by Project proponent		
Exhibits 1-21		
VVB Assessment		**Date: 08/03/2021**
The PP has provided the requested evidence. **CL closed.**		