

CHYULU HILLS REDD+ PROJECT



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Summary

Aster Global Environmental Solutions, Inc., (herein referred to as Aster Global or the verification team) was contracted by Maasai Wilderness Conservation Trust on behalf of the Project Proponent [Chyulu Hills Conservation Trust (CHCT)] on 30 April 2021 to conduct the second monitoring period verification (VCS: 01 January 2017 – 31 December 2020; and CCB: 01 January 2017 – 31 December 2020) of the Chyulu Hills REDD+ Project [Validated Project Description (PD) version 1.42, dated 23 June 2015]. The Project falls under the VCS sectoral scope 14: – Agriculture, Forestry, and Other Land Uses (AFOLU), under the category Reduced Emissions from Deforestation and Degradation (REDD+). Specifically, the project falls under the REDD+ categories Avoided Unplanned Deforestation (AUD) for forest areas, Avoided Unplanned Conversion (AUC) for grasslands.

The Chyulu Hills REDD+ Project (CHRP) consists of seven land units covering 410,533.84 hectares, with a project accounting area of 374,677.64 ha located over three counties (Makueni, Taita-Taveta, and Kajiado) in southeastern Kenya. Through adherence and validation to VCS Methodology VM0009 for Avoided Ecosystem Conversion and Climate, Community & Biodiversity Standards (Second Edition, December 2008), CHRP is described as “a multi-partner initiative designed to promote climate change mitigation and adaptation, restore biodiversity and create alternative livelihoods under the United Nations scheme of Reducing Emissions from Deforestation and forest Degradation (REDD+)” as stated in the PD.

The VCS verification assessed compliance with the VCS Version 4 Program Guide, Standard, the VM0009 Methodology, all associated updates, the validated Project Document, and the likelihood that implementation of the planned GHG project has resulted in the GHG emission removal enhancements as stated by the Project Proponent (ISO 14064-3:2006).

The CCB verification purpose assessed that implementation of the planned GHG project has occurred, resulting in the GHG emission removal enhancements (climate), community, and biodiversity benefits as stated by the project developer (ISO 14064-3:2006). The verification objective is to ensure the validated project design documentation has been implemented in compliance with CCB Standards (Second Edition).

The scope of the verification followed Section 4.3.4 of ISO 14064-3:2006, and methods included assessment of the GHG project implementation; physical infrastructure, activities, technologies and processes of the GHG project; GHG sources, sinks and/or reservoirs; types of GHGs; and time periods covered. CHRP follows the framework of project activities listed above.

The criteria followed the verification guidance documents provided by Verra located at <https://verra.org>. Unless otherwise indicated, the assessment was performed against the most recent version of the relevant VCS guidance documentation.

Verification to the VCS Program and CCB Standards resulted in findings raised. A summary of all VCS findings is included in Appendix B, and CCB findings are included in Appendix C.

A risk-based approach was used to guide the verification and reach a *reasonable* level of assurance that no errors, omissions, nor misrepresentations resulting in a material misstatement have occurred. The materiality threshold dictated by the project size was 1%. All findings were satisfied to a *reasonable* level of assurance.

After completion of a site inspection and review of all project information, procedures, calculations, and supporting documentation, Aster Global Environmental Solutions, Inc., confirms the Project is accurate, consistent, and complies with all VCS Version 4 criteria, CCB Second Edition criteria, the selected methodology (VM0009), and the validated PD. Aster Global confirms The Chyulu Hills REDD+ Project 2nd Monitoring Report (Version 3.4, dated 31 December 2020) has been implemented in accordance with VCS Version 4 and CCB Second Edition criteria.

Aster Global confirms all verification activities – including objectives, scope and criteria, level of assurance, and PD implementation adherence to VCS Version 4 (and all associated updates) and CCB Project Design Standards (Second Edition), as documented in this report – are complete. Aster Global concludes without any qualifications or limiting conditions. The Chyulu Hills REDD+ Project 2nd Monitoring Report (Version 3.4, dated 31 December 2020) meets the requirements of VCS Version 4 (and all associated updates), CCB Project Design Standards (Second Edition), and the validated PD. In addition, Aster Global asserts the project complies with the criteria for projects set out in the Second Edition of the CCB Standards to achieve Gold Level distinction for Climate, Community and Biodiversity.

The GHG assertion provided by CHCT and verified by Aster Global has resulted in the Gross Emissions Reductions and/or Removals (GERs) of 4,342,754 tCO₂ equivalents (CO₂e) by the project during the verification period/reporting period (VCS and CCB: 01 January 2017 – 31 December 2020 – 4 years). This value is gross of the 10% (434,275 t CO₂e) annual buffer withholding and the buffer pool return (0 t CO₂e) based on the non-permanence risk assessment tool and associated leakage allocation. This results in 3,139,694 t CO₂e of credits eligible for issuance as VCUs.

Table of Contents

1	Introduction.....	5
1.1	Objective	5
1.2	Scope and Criteria	5
1.3	Level of Assurance.....	6
1.4	Summary Description of the Project	6
2	Verification Process.....	6
2.1	Audit Team Composition (<i>Rules 4.3.1</i>)	6
2.2	Method and Criteria.....	7
2.3	Document Review	8
2.4	Interviews	8
2.5	Site Inspections	10
2.6	Resolution of Findings.....	11
2.7	Eligibility for Validation Activities	12
3	Validation Findings.....	12
3.1	Participation under Other GHG Programs	12
3.2	Methodology Deviations.....	12
3.3	Project Description Deviations (<i>Rules 3.5.7 – 3.5.10</i>)	14
3.4	Minor Changes to Project Description (<i>Rules 3.5.6</i>).....	14
3.5	Monitoring Plans (CL3.2, CM3.3, B3.3)	14
4	Verification Findings.....	14
4.1	Public Comments (<i>Rules 4.6</i>)	14
4.2	Summary of Project Benefits.....	14
4.3	General.....	15
4.4	Climate	21
4.5	Community	25
4.6	Biodiversity	28
4.7	Additional Project Implementation Information	30
4.8	Additional Project Impact Information	30
5	Verification Conclusion	31
	Appendix A: Documents list	32
	Appendix B: list of findings.....	54

1 INTRODUCTION

1.1 Objective

The objective of this verification was to ensure implementation of project activities and project compliance with the VCS Program Guide, VCS Standard, CCB Standards, selected methodology, and the validated VCS Project Description (PD). Aster Global assessed the GHG emission removals for the AFOLU project, specifically REDD+.

1.2 Scope and Criteria

The scope of a verification generally includes the GHG project and baseline scenarios; physical infrastructure, activities, technologies and processes of the GHG project; GHG sources, sinks and/or reservoirs; types of GHGs; time periods covered; evaluation of the sustainable development; and evaluation of the project's net climate, community, and biodiversity benefits. The geographic verification scope is defined by the project boundary, the carbon reservoir types, management activities, growth and yield models, inventory program, and contract periods. The scope of the project was outlined by the Project Proponent within the Project Description (PD) and is re-defined as follows for the GHG project:

Baseline Scenario	Ecosystem conversion
Activities/Technologies/Processes	REDD activities utilizing VCS VM0009 and CCB Standard for Climate, Community and Biodiversity benefits
Sources/Sinks/Reservoirs	Aboveground merchantable tree – No Aboveground other (non-merch tree) – Yes Aboveground non-tree – Yes Belowground merchantable tree – Yes Belowground other (non-merch tree) – Yes Belowground non-tree – Yes Litter – No Dead-wood – No Standing dead-wood – Yes Lying dead-wood – No Soil organic carbon – Yes Long-lived wood products – No
GHG Type	CO ₂
Time Period (start date, crediting period, verification period)	Project State Date: 19 September 2013 Second Monitoring Period: 01 January 2017 – 31 December 2020 Crediting Period: 30 years
Project Boundary	Approximately 410,533 hectares in the Chyulu Hills mountain range of southeastern Kenya

The criteria followed the verification guidance documents provided by VCS located at <https://verra.org/project/vcs-program/>. These documents include the following:

- VCS Program Guide (v4.1, 20 January 2022)
- VCS Standard (v4.2, 20 January 2022)
- VCS Program Definitions (v4.1, 20 January 2022)
- AFOLU Non-Permanence Risk Tool (v4, 19 September 2019)
- VM0009 – Methodology for Avoided Ecosystem Conversion, v3.0

- Validated PD and previous monitoring reports (VCS and CCB)
- CCB Program Definitions (v3.0, June 2017)
- CCB Standards (Second Edition, v2.0, December 2008)
- CCB Program Rules (v 3.1 June 2017)
- Guidance for the Use of the CCB Standards (May 2014)

1.3 Level of Assurance

The level of assurance was used to determine the depth of detail the verification team placed in the Verification and Sampling Plan (VSP) to determine if there are any errors, omissions, or misrepresentations (ISO 14064-3:2006). Aster Global assessed the project's implementation of general principles, data collection and processing, sampling descriptions, documentation, *ex post* calculations, etc., to provide *reasonable* assurance to meet the Project Level requirements of the VCS Program. Based on the verification findings, a final evaluation statement reasonably assures the project GHG representations are materially accurate. The evidence used to achieve a *reasonable* level of assurance is specified in subsequent sections of this report.

1.4 Summary Description of the Project

The Chyulu Hills REDD+ Project (CHRP) consists of seven land units covering 410,533.84 hectares, with a project accounting area of 374,677.64 hectares located over three counties (Makueni, Taita Taveta, and Kajiado) in southeastern Kenya. The project aims to reduce emissions by Avoiding Unplanned Deforestation (AUD) for forest areas and Avoiding Unplanned Conversion (AUC) for grasslands. According to the PD, the CHRP is an initiative designed to "to promote climate change mitigation and adaptation, restore biodiversity and create alternative livelihoods under the United Nations scheme of Reducing Emissions from Deforestation and Forest Degradation (REDD+)." The project is estimated to avoid emissions of 37,765,494 t CO₂e over the project's 30-year crediting period.

2 VERIFICATION PROCESS

2.1 Audit Team Composition (*Rules 4.3.1*)

For VCS/CCB verifications, Aster Global maintains an experienced internal staff of Lead Verifiers, in addition to Certified Foresters, Registered Professional Foresters, The Wildlife Society Biologists, M.S. Forest Biometricians, Remote Sensing/GIS Specialists, a Soil Scientist, and VCS-approved AFOLU Experts in IFM, REDD, and WRC categories. Direct employees of Aster Global conducted all desktop verification activities. Aster Global completed all calculation/modeling review in-house with our team of forest biometricians, GIS/remote sensing specialists, and soil scientist. Aster Global has been involved in over 68 VCS verifications and 36 CCB verifications, including 27 methodology assessments and has completed several verifications for REDD projects in Kenya and other East African countries. Aster Global has a specialist on staff with ten years of CCB experience, who oversees project review for CCB components and who has conducted a previous verification site visit for this project. All Aster Global staff involved in the verification audit have ecological, biodiversity, natural resources and forestry background to fulfill these requirements.

Additionally, Aster Global sub-contracted with Daniel Masika, who served as a translator when needed during the site visit, in addition to fulfilling the CCB requirement for expertise required in Section 4.3.1 of the CCB Program Rules: Version 3.1.

2.2 Method and Criteria

The verification assessed the Project's compliance with VCS Version 4, CCB Second Edition, all associated updates, the selected methodology (VM0009, v3.0), and the validated Project Description (PD), version 1.42, dated 23 June 2015. The Verification team assessed the Greenhouse Gas (GHG) emission removals for the monitoring period/verification period (01 January 2017 – 31 December 2020) through Agriculture, Forestry, and Other Land-Use (AFOLU) criteria under the categories Reduced Emissions from Deforestation and Degradation (REDD). Specifically, the Project falls under the REDD+ category Avoided Unplanned Deforestation (AUD) for forest and Unplanned Conversion (AUC) for grasslands. The verification team assessed whether the Project Proponent adequately addressed project emissions, unplanned reductions in carbon stocks, and any possible leakage outside of the project boundary.

The non-permanence risk analysis was assessed for this verification. Further, following Section 2.1.2 of the VCS Validation & Verification Manual V3.2, the objectives of the verification exercise were to evaluate the monitoring report and assess:

- The extent to which methods and procedures, including monitoring procedures, have been implemented in accordance with the validated project description. This includes ensuring conformance with the monitoring plan.
- The extent to which GHG Emission Reductions or Removals reported in the monitoring report are materially accurate.

The criteria followed the verification guidance documents provided by Verra and CCBA. Unless otherwise indicated, the assessment was performed against the most recent version of the relevant VCS or CCB guidance document. Please also see Section 1.2 of this report.

In the verification process, there is a risk that potential errors, omissions, and misrepresentations will be found; therefore, a risk-based approach was used to guide the collection of appropriate and sufficient evidence to support a *reasonable* level of assurance. A risk-based approach means that the verification team focused on items that might result in a material misstatement of the reported GHG assertion.

A project-specific VSP was developed to guide the verification auditing process to ensure efficiency and effectiveness. The purpose of the VSP 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 VSP methodology was derived from all items in our verification process stated above. Specifically, the sampling plan utilized the Verra and CCBA guidance documents and ISO 14064-3. Any modifications applied to the VSP were made based upon the conditions observed for monitoring to detect the processes with highest risk of material discrepancy.

A detailed field plan was developed to guide the verification site visit and is embedded within the VSP. For the field sampling effort, direct measurement and observation of re-measurement, interviews, and review of the monitoring period emission reductions in the key areas were determined to be the greatest risk, followed by ground-truthing and review of project activities. Field sampling and techniques were based on the project parameters/scope to meet a *reasonable* level of assurance, as directed by the professional judgment of the Lead Verifier.

2.3 Document Review

A detailed review of all project documentation was conducted as part of the desktop verification component to ensure consistency with, and identify any deviation from, VCS Program requirements, CCB program requirements, the methodology (VM0009), the validated PD and Monitoring Report (MR). Initial review focused on the validated PD and MR relative to the field conditions observed and interviews with project management staff. Project details, implementation status, data and parameters, and quantification of GHG emission reductions and removals were thoroughly examined. Key supporting documents were also reviewed. These included monitoring data (i.e., remote sensing/GIS data), Standard Operating Procedures (SOPs), financial analyses, boundaries, maps and aerial images, biomass and carbon calculation spreadsheets, CCB interview/survey results, and responses to Clarification Requests (CLs).

The VCS AFOLU Non-Permanence Risk Tool was used by the Project Proponent 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. Any identified NCR and/or CL findings related to the AFOLU Non-Permanence Risk Tool/Report are presented in Appendix B. The final score was calculated to be 10%.

For a listing of all documents received from the Project Proponent for this verification, please see Appendix A.

2.4 Interviews

Interviews were performed during the verification site visit as part of the overall verification process. The interviews were conducted for the purpose of substantiating information provided in the PD, MR, and supporting documents provided by the Project Proponent, and to solicit additional information as needed. Aster Global provided the Project Proponent with a list prior to the site visit for requested interviews with targeted project management staff, project employees, community members and other stakeholders. The Project Proponent provided appropriate arrangements for the interviews. On-site interviews and informal discussions were conducted during the site visit (07 August through 14 August 2021). Interviewees were provided the option of communicating in English, Swahili, or Maa based on personal comfort and preference. Interviews were requested and held with individuals representing groups of stakeholders selected by the verification team. The following is a list of individuals and groups with whom the verification team met during the site visit:

Samson Parashina, Chairman MWCT and CHCT Boards
Andrey Arutyunyan, MWCT Grants and REDD+ Project Office Coordinator
Mutuka Mutua, MWCT REDD+ Coordinator, East Community Coordinator, and Bee-Keeping
Simon Metito, Kuku A Group Ranch, CHCT Board
James Panian, Rombo Group Ranch, CHCT Board

- Julius Lemoyian, Kuku Group Ranch, CHCT Secretary

Misorogu Mwacus, Mbirikani Group Ranch Committee Member
Peter Mantoo, Area Chief, Iltital; Education Coordinator
Ruth M. Muthoka, Chief, Nthongawi Location
Susan M. Kithuku, Chief, Utith Location
Josephai M. Musau, Senior Assistant Chief, Utith Location

David Oyogi, Senior Warden, Tsavo West National Park, Kenya Wildlife Service (KWS)

Peter Njoroge, Warden, Chyulu Hills National Park, KWS

Liverson M. Kania, Deputy Warden, Chyulu Hills National Park, KWS

Maurice Wanyiri, Kenya Forestry Service

James G. Mbuthia, Sheldrick Wildlife Trust

- James Abuga, Big Life Foundation, REDD Accounting
- Craig Millar, Big Life Foundation, Chief Operating Officer
- Daniel Sambu, Big Life Foundation, Predator Protection, Community Liaison
- Big Life Foundation, Big Life Rhino Team representative
- Daniel Kanai, Big Life Foundation, Ranger

David Okul, MWCT Conservation Manager

David Kanai, MWCT Simba Scout Coordinator

Emmanuel Silato, MWCT, Administrative Sergeant for Simba Rangers

Johana Ole Muhindi, Coordinator for Wildlife Pays

Grace Waiguchu, KWS Staff

KWS Temporary Employees: Ochieng Danis, Justus Bundi, and Charles Mijitsya

- Agnes Nailentei, MWCT Field Communications Officer

Charity Lanoi, MWCT Livelihoods Coordinator

Dr. Mukhwana Kisika, MWCT, Doctor

Serah Shiangoi, MWCT, Community Health Worker

Thange Tree Nursery: Nicodemus and 7 women from Women's Group

Amos Ngao Mathew, Community Group

- Mapimwa Self Help Group (beekeeping): Alpheus K. Mancau (Secretary), and 6 other members present/participated in interview
- Ngaramatok Women's Group (grass seedbank): Chairwoman Annah Mandi, Pricilla Natsoi, Joyce Martin, and 5 other members present/participated in interview
- Iltital Women's Group (beading handicrafts): Chairwoman and 9 other members present/participated in interview
- Loosikito Water Project representative
- Representative Student Bursary Beneficiary Families: Catherine Ndunge, Mutuku Kisunga, Rosa Kaleli, Evalyne Ndunge
- Eddy Kasaine, Headmaster, Marlal Primary School
- Marlal Primary School Staff: Gregory Mutio, Wilson Lekoyia, and John Charagu,

Justus Malombe, Principal, Ilani Boys High School

Kidirin Ndanin, Wildlife Pays beneficiary, community member

Forest plot monitoring team

Leyio Mashamud - Forest plot monitoring team

Tajir Lekeri – Forest plot measuring team

Peter Matee – Forest plot measuring team

Josephene Kithome – Forest plot measuring team

Judith Nyamai – Forest plot measuring team/botanist

The interviews were conducted for the purposes of substantiating to a *reasonable* degree of assurance information presented in the MR, including activities reported as undertaken or supported by the project during the monitoring period, employment practices by the Project Proponent, participation by community

members in project activities, and community understanding of the grievance process. The interviewer was also tasked with identifying whether community members were aware of project monitoring results, were aware of the public posting of the MR and opportunity to comment, and whether community members or project staff had been informed of the auditor's scheduled site visit and purpose of the site visit.

2.5 Site Inspections

The verification site inspection (field visit) occurred from 07 to 14 August 2021. The verification field activities closely followed Aster Global's VSP methodology. Sample size and techniques were based on the project parameters, scope, and best professional judgment of the Lead Verifier. Plots selected for detailed review were chosen based on the highest volume of biomass and under the discretion of the Forest Biometrician and the Lead Verifier. A risk-based approach was used to select the plots to allow a review of multiple plots targeted to represent a wide geographic range that was sufficient to provide the necessary sample size to meet a *reasonable* level of assurance, as directed by the professional judgment of the Lead Verifier.

For this verification, a total of 13 of the Project's permanent biomass sampling plots (PSPs) were re-visited. The PSPs confirmed the Project's SOPs for field data collection were followed. The Verifier compared the data collected from the site visit to the data from the original Project data sheets to ensure accuracy. The sample observations showed consistency and conservativeness with the original data collected by the Project Proponent.

To confirm leakage sampling was being conducted appropriately, the Verifier re-sampled 1 grassland leakage plot while in the field to confirm the projects leakage SOPs were appropriately followed. A second forest leakage plot was attempted to be remeasured, but re-sampling was prohibited by the landowner as they are external to the project and have a right to enforce their boundaries. On the one measured plot observed, on-site damage appeared to be primarily caused by elephants or consisted of very old stumps created prior to the monitoring period. The Verifier's leakage sample observations showed consistency with the SOP's and conservativeness in the field data collected by the Project Proponent. The Verifier confirmed the minimum leakage sampling requirements of VM0009 v3.0 had been surpassed by the Project, and the leakage calculations had been implemented correctly. The Verifier confirms that the appropriate leakage deduction for the project is 0%.

For the CCB verification component of the site inspection (field visit), the verification team performed on-site reviews for representative community-based project activities identified as implemented or ongoing during the monitoring period. Project activity locations or activities visited included the following:

- 07 August 2021: Presentation from MWCT on Chyulu Hills REDD+ Project
- 08 August 2021: Maasai Wilderness Conservation Trust (MWCT) headquarters
- 09 August 2021: Interview with local Chief (area that received relatively large amount of benefits during monitoring period); interviews with Group Ranch representatives from Kuku A, Rombo, and Kuku; SMART system and Simba Tracking program; Ilitalil Dispensary
- 10 August 2021: Marlal Primary School; KWS Tsavo West National Park headquarters and Mzima Springs restoration
- 11 August 2021: Chyulu Hills National Park headquarters; Kibwezi Forest boundary fencing; Thange Tree Nursery and Water Tank replacement; meetings with representative Eastern

Community members and activities including school bursary recipients, Ilani Boys High School water tank replacement, and Mapimwa Self Help Group (honey/beekeeping)

- 12 August 2021: Big Life Foundation headquarters and project activities documentation; Black Rhino monitoring system; Mbrikani Group Ranch representative; Loosikito water project (for livestock and wildlife); community cattle crush
- 13 August 2021: Women's Group – grass seedbank; Women's Group – beading handicraft; Wildlife Pays program participants
- 14 August 2021: interview with Chairman of CHCT and MWCT Boards

2.6 Resolution of Findings

During the verification process, there was a risk that potential errors, omissions, and misrepresentations would be found. The actions taken when errors, omissions, and misrepresentations were found included notifying the client of the issue(s) identified and expanding our review to the extent that satisfied the Lead Verifier's professional judgment.

The process of resolution of findings involved four formal rounds of assessment by the VVB. Findings were resolved during the verification by the Project Proponent implementing corrective actions, such as amending the MR and calculations, as well as providing written responses. This resulted in project documentation that was in conformance with the requirements of the VCS Standard and CCB Second Edition for GHG projects.

Findings were characterized as:

Non-Conformity Reports (NCRs) were issued as a response to material discrepancies in a part of the project and generally fell into one category:

- Non-conformity to a VCS or CCB guiding document listed in Sections 1.2 and 2.2 above
- Consistency among project documentation or calculations was lacking
- Mathematical formulae were incorrect
- Additional information was required by the VVB to confirm reasonable assurance for compliance

Clarifications (CL) were issued when language within a project document needed extra clarification to avoid ambiguity.

Opportunities for Improvement (OFI) were issued to the Project Proponent when an opportunity for improvement was identified.

During the verification, sixty (60) VCS findings and twenty (20) CCB findings were identified. Detailed summaries of each VCS finding, including the issue raised, responses, and final conclusions, are provided in Appendix B VCS NCRS/CLS/OFI Summary. Please also see APPENDIX C: CCB NCRS/CLS/OFI Summary for all findings raised during the CCB review. All NCRs/CLs were satisfactorily addressed. Two findings resulted in a Forward Action Request, described below.

2.6.1 Forward Action Requests

A Forward Action Request (FAR) is being issued for the next verification team to assess efforts the Project Proponent is taking to track and report on the number of women directly working on project activities in

return for compensation (financial or otherwise), including employees, contracted workers, sub-contracted workers and community members who are paid to carry out project-related work, in accordance with standardized benefit metrics for Section 1.2 of the Monitoring Report. Please refer to Section 4.3.7 of this report for additional information.

A FAR is being issued for the next verification team to review the status of an ongoing legal dispute referred to as the Mikulolo land dispute, involving land within the Chyulu Hills National Park portion of the project area. More information on this dispute is provided in Section 4.3.10 of this report.

A FAR is being issued for the next verification team to ensure that the project collects measurements in the proxy areas for both aboveground biomass and SOC, as required by the methodology. Additionally, the next verification team must assess any differences between the SOC estimation applied in this monitoring period and the future measured SOC values.

2.7 Eligibility for Validation Activities

Validation activities are not applicable to this verification.

3 VALIDATION FINDINGS

3.1 Participation under Other GHG Programs

The verification team performed a search of other registries and confirmed the project has not been registered and is not seeking registration under any other GHG programs, nor are they involved in other forms of environmental credits from its activities. The CHRP currently only seeks carbon credits with the CCB label under the VCS program. This was confirmed through a risk-based internet review and interview with the PP.

Section 2.3.1.4 of the PD states that the Project aims to be included in a jurisdictional REDD+ scheme. However, Section 2.1.9 of the MR states that Kenya is still in the process of finishing its national REDD+ policy framework. As Kenya's national REDD+ framework is still under development, the project does not currently fall within a jurisdiction covered by a jurisdictional REDD+ program. Therefore, the verification team deems the project eligible to participate under the VCS Program.

3.2 Methodology Deviations

Two (2) methodology deviations were identified and documented during this verification period. There have been no previous methodology deviations implemented since the inception of the project. As required by Section 3.18 of the VCS Standard V4.2, the verification team reviewed the methodology deviations and confirmed they are appropriate. These deviations are described in Section 2.2.2 of the MR and included below.

Methodology Deviation	Verification Team's Assessment
Proxy area plots re-measurement: All leakage plots, proxy area plots and project accounting area plots must be remeasured at least	This is the first methodology deviation applied during this monitoring period and since the project's inception.

every five years, or after a significant event that changes stocks in the proxy or project accounting areas. However, the proxy area plots were not measured due to access constraints. Nevertheless, we did analyse the land cover of the plots with updated (2020) geospatial information. Please refer to Section 3.2.1.6. and to folder Findings\FirstRound\Climate\Proxy. This deviation does not affect the conservativeness of the estimations since we are using information of the land cover that correspond to the year of the plots measuring. In this sense we are confirming that the vegetation type of the proxy areas corresponds to the same than those identified in the previous validation and verification of the project. This deviation was applied just to the parameter proxy area carbon stock and do not affect any other section of the methodology followed.	The verification team confirms the methodology deviation meets the criteria of the VCS Standard V4.2, Section 3.18, as: • The deviation represents a deviation from the criteria and procedures relating to monitoring or measurement set out in the methodology. • The deviation should not negatively impact the conservativeness of the estimations, as actual land cover data corresponding to the year of plot measurement was utilized. • The deviation is occurring at verification, and its consequences are being reported herein. • The decision to re-sample proxy plots should be revisited by the next verifier at the time of the next relevant trigger event.
• Soil sampling and remeasurement The parameter 'Carbon not decayed in SOC at the end of the current monitoring period' included under Section 3.1.2 of the monitoring report was not monitored for the current monitoring period according to Appendix H and Section 8.1.5 of the methodology VM0009. The deviation to the methodology occurred primarily due to the need to comply with national Covid-19 pandemic regulations. This lock down made it impossible to effectively transport soil samples between counties. In addition, the soil analysis laboratories, located in Nairobi, were severely limited in their capacity to process samples throughout the Covid-19 pandemic. The deviation does not affect the conservative approach because, as detailed in the biomass information and the disturbances analysis, the project area has not experienced a significant loss of vegetation due to deforestation or degradation. In this sense, the soil carbon in the project area is unlikely to have been reduced and instead has probably been conserved and increased.	This is the second methodology deviation applied during this monitoring period and since the project's inception. The verification team confirms the methodology deviation meets the criteria of the VCS Standard V4.2, Section 3.18, as: • The deviation represents a deviation from the criteria and procedures relating to monitoring or measurement set out in the methodology. • The deviation should not negatively impact the conservativeness of the estimations, as actual land cover data corresponding to the year of remeasurement was utilized. • The deviation is occurring at verification, and its consequences are being reported herein. Furthermore, the VVB has issued a FAR requiring that the project collect measurements in proxy areas prior to the next verification and report these results during the next monitoring period and for the verification team to assess any differences between the SOC estimation applies in this monitoring period and the future measured SOC

	values. For more details, please see Section 2.6.1 of this Verification Report.
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The verification team assessed the methodology deviations and determined that they meet the criteria and specifications identified for permitted methodology deviations identified in the VCS Standard v4.2. The methodology deviations do not negatively impact the conservativeness of the quantification of GHG reductions or removals, are more accurate, and are related to monitoring and measurement. The verification team concludes the methodology deviation applied to the project is allowable.

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

There were no PD Deviations applied to the project during this verification period.

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

Rule 3.5.6 allows minor changes to the validated PD at verification. During this verification period, one minor change to the PD was identified. This regarded several indicators in the Social and Biodiversity Assessment not being monitored in full accordance with methods, frequency, or reporting requirements, as identified within the validated community or biodiversity monitoring plans. The verification team reviewed the community and biodiversity monitoring minor PD change and determined that the changes from the community and biodiversity monitoring plan do not meet any of the situations listed in Rule 3.5.7 requiring a new validation or the validation of a PD deviation. The change from the validated monitoring plan would be considered minor and has been addressed in the explanation provided in Section 2.2.3 of the MR.

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

All monitoring plans have been previously validated against the Climate, Community & Biodiversity Standards during the initial validation activities. This section is not applicable for this verification.

4 VERIFICATION FINDINGS

4.1 Public Comments (*Rules 4.6*)

The public comment period was held from 04 August 2021 to 03 September 2021. There were no comments received on the Verra webpage.

4.2 Summary of Project Benefits

Please see Section 1.4 of this report for a summary description of the Chyulu Hills REDD+ Project.

The project aims at reducing emissions related to Avoided Unplanned Deforestation (AUD) for forest and Unplanned Conversion (AUC) for grasslands. According to the Project Description Document, “The CHRP aims to generate benefits in the areas of climate, community, and biodiversity under both the Verified Carbon Standard (VCS) and the Climate, Community and Biodiversity (CCB) standards. Its specific climate related goals are to prevent the emission of 37,765,494 t CO₂e over the project’s 30-year crediting period by stopping deforestation, forest degradation and grassland conversion.” Section 1 of the MR describes

unique project benefits, including climate, community, biodiversity, and standardized benefit metrics, which also includes achievements specific to metrics.

The climate impacts described in the MR reduce emissions by reducing deforestation in the project area. The avoided emissions claimed for climate impacts are evaluated elsewhere in this review and allow the verification team to corroborate the claims.

4.3 General

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

A comparison of the implementation schedules in the MR and PD shows the project has met key milestones identified in the PD for the period from the Project start date through the monitoring period. The Project has identified additional key dates and milestones for the monitoring periods, including continued operations. During the review, the verification team noted a discrepancy regarding monitoring of certain biodiversity and community elements identified in the PD. With additional clarification from the Project Proponent, the verification team determined this discrepancy can be included as a Minor Change to the PD (see Section 3.4 of this report). This discrepancy was appropriately rectified, and the verification team determined there are no material discrepancies between the project implementation and the PD and that the monitoring plan was implemented completely.

The Verification team requested to visit examples of all activities during the site visit and subsequently confirmed the implementation of items related to climate, community, and biodiversity. Climate objectives achieved included avoiding the net emissions of 3,139,694 tCO₂e.

The verification team witnessed examples of each activity and noted that understanding of the project and adherence to project requirements was strongly correlated to the degree to which project activities are implemented in any given area of the project. As revenues accrue, the project is extending activities to more parts of the project zone.

The GHG emission reductions generated by the project have not been included in an emissions trading program other than the VCS program, and the Project has not received or sought any other form of environmental credit as confirmed through a risk-based review by the verification team (see Section 3.1). Sustainable development contributions are applicable to this project and through site visit interviews, observations of project activities during the site visit, and document review. As part of the verification, the verification team assessed the status of project activity implementation and contributions toward sustainable development goals (SDGs). The verification team determined the project has actively supported 13 of the UN SDGs as reported in Section 2.1.10 of the MR.

During this verification period, one (1) Methodology Deviation (see Section 3.2 of this report) and one (1) Minor Change to Project Description (see Section 3.4 of this report) were reviewed and confirmed. There were no *previously* reported Methodology Deviations, Minor Changes to Project Description, or PD Deviations. Verifiers can conclude that the project has been implemented as described in the validated PD.

4.3.2 Risks to the Project (G3.5)

Risks to the expected project benefits are described in Section 2.2.5 of the MR. The major risks to the project include human, natural, political, and policy risks. Risks identified include slash and burn/unsustainable agriculture, unregulated extraction activities, poaching, anthropogenic fires, droughts, natural fires, Kenya's political stability, legislative changes, risk of reversal, and insufficient revenues. The identified risks in Section 2.2.5 are consistent with the risks identified in the PD.

Through site visit interviews and additional clarification from the Project Proponent, the verification team substantiated that identified human-induced risks were appropriately mitigated through actions identified in Section 2.2.5 of the MR. Actions taken include the Project Proponent providing opportunities for Alternative Income Generating Activities (IGAs) and other livelihood interventions to mitigate communities' dependence on slash and burn/unsustainable agriculture. Increased capacity of rangers and increased patrols were substantiated through site visit interviews as being effective in mitigating unregulated extraction activities, poaching, and anthropogenic fires.

Natural risks, including droughts and fires, were substantiated as having been appropriately mitigated through site visit interviews and additional clarification from the Project Proponent. The verifiers substantiated that progress towards measures identified as being taken to mitigate both fires and drought occurred during this verification period through site visit interviews with project partners and community members.

Political risks identified were described to be mitigated through effective participation and partnership with multiple levels of government. Site visit observations and interviews substantiated the project's partnership with identified government entities and their ability to influence the project. Site visit interviews and observations substantiated stakeholders' support and willingness to participate in the project, appropriately mitigating the identified risk of reversals. The risk of insufficient revenues was addressed through review of the NPRT. Overall, through review of project documentation, site visit interviews and observations, and additional clarification from the Project Proponent, the verification team substantiated the project was successful in mitigating the identified natural and human-induced risks to the project for this verification period.

4.3.3 Enhancement of High Conservation Values (G3.6)

To ensure the maintenance or enhancement of high conservation values (HCVs), the MR was compared to the PD. The biodiversity-related HCVs identified in the validated PD include vulnerable, near threatened, endangered, and endemic species; areas that support significant concentrations of a species during any time in their life cycle; significant large, landscape-level areas where viable populations of most, if not all, naturally occurring species exist in natural patterns of distribution and abundance; threatened or rare ecosystems; and areas that provide critical ecosystem services and erosion control. Community related HCVs identified in the PD include areas that are fundamental to meeting the basic needs of local communities and areas that are critical for the traditional cultural identity of communities.

The MR identifies measures taken to mitigate these risks. To verify whether reasonable steps were taken to mitigate identified risks, the verifiers assessed each identified risk through review of project and supplemental documentation, site interviews and observations, as well as additional clarification from the Project Proponent. The verifiers substantiated through site visit interviews that ground patrols implemented

during this verification period were implemented to patrol and protect habitat areas for identified HCVs. Protection of HCVs was also substantiated through review of the implementation of the selected methodology (VM0009), and the associated reduction of deforestation during this verification period. Through review of project documents and implementation of the selected methodology, substantiated by site visit interviews and additional clarification from the Project Proponent, the verification team determined the Project Proponent has implemented appropriate actions to ensure the maintenance or enhancement of HCVs consistent with the precautionary principle.

4.3.4 Benefit Permanence (G3.7)

The verification team reviewed the PD for actions required in order to compare to actions in the MR taken to maintain and enhance CCB benefits beyond the project lifetime. Actions identified in the MR and PD include education, poverty reduction, creation of IGAs, sustainable management of natural resources and sustainable agriculture. Additional measures and approaches identified include cross-collaboration of entities involved in the project, strong governance, building institutional capacity, other Payment for Ecosystem Services (PES), and endowment. Site visit interviews with project partners and community members substantiated the status of implementation for all measures identified in the PD, which have been taken to maintain and enhance the CCB benefits beyond the project lifetime. Through additional clarification from the Project Proponent, paired with the review of project documents and site visit interviews and observations, the verification substantiated that the measures taken to enhance project benefits beyond the project lifetime are reasonable and in accordance with the validated project description.

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

The verification team reviewed the PD for actions required in order to compare to actions in the MR taken for stakeholder engagement. The auditor interviewed Project Proponent representatives, community leaders, and community members to substantiate communication between the Project Proponent and stakeholders has occurred in accordance with the communication and consultation plan. These interviews substantiate that the project has held community meetings and advisory committee meetings during this verification period in accordance with the PD. Site visit interviews with community members demonstrated widespread satisfaction with the amount of communication with project personnel and agreement that community groups have input into determining project activities. The auditor also reviewed supplemental materials provided by the Project Proponent regarding community outreach meetings. The interviews, along with support documents provided by the Project Proponent, substantiated that the Project Proponent holds regular meetings with a variety of community stakeholders, and the occurrence of these meetings and associated opportunities for project input are widely known throughout the communities.

Section 2.3.2 of the MR describes the actions taken to distribute the MR and make it publicly available and accessible to stakeholders. These actions include informing local authorities and communities via emails, formal letters, and phone calls, notifying community members of the public comment period, displaying important project information on community information boards, making the MR and results of the community monitoring available for public review in project offices, providing copies of the MR in locally appropriate languages, posting the MR on the CCB website, and providing project information to stakeholders through community meetings and outreach measures. The verification team substantiated that the identified actions were appropriately taken during this verification, observing project information on local community boards, and substantiating through site visit interviews with project stakeholders that the MR and other project information were appropriately distributed and accessible. Site visit observations and

interviews substantiated the occurrence of meetings and outreach measures to publicize and distribute project information in locally appropriate languages. The verification team requested additional clarification and supplemental documentation in the form of copies of project summary documents in Maa and Swahili and the posting of the MR summary on the Verra webpage. The verification team reviewed the additional clarification and supplemental documentation, as well project documentation and site visit interviews and observations, and determined the project carried out effective stakeholder engagement during this verification period.

4.3.6 Stakeholder Grievance Redress Procedure (G3.10)

Section 2.7.3 of the PD describes the initial feedback and grievance redress procedure and commits to developing a project-specific, three-stage feedback and grievance redress procedure. This procedure was developed as stated in the PD and a digital copy was provided to the verification team (Chyulu Hills REDD+ Project Feedback and Grievance Redress Procedures). Site visit interviews with project partners, project staff, local community leaders, and community members substantiate widespread knowledge about the presence of a grievance redress procedure and an understanding regarding who to go to if they have project related grievances or concerns. Additional clarification from the Project Proponent determined that four (4) formal grievances were raised from 2016-2020, with only one being formally raised during this monitoring period. While four formal grievances were filed from 2016-2020, the verifiers substantiated through site visit interviews that minor concerns or questions were handled through the respective grievance redress procedures of project partners, as well as through traditional means within communities, in accordance with the project feedback and grievance redress procedures. The verification team reviewed the Feedback and Grievance Redress Procedure as well as documentation of the filed grievances provided by the Project Proponent and determined that all four formal grievances were properly documented and addressed through the project grievance process.

Documentation provided to the VVB included copies of the filed formal grievance, documents demonstrating actions and dates of actions by Project staff, and other relevant documents involved in investigation of the grievance. Through review of the provided grievance procedure, additional clarification and supplemental documentation provided by the Project Proponent, as well as site visit interviews, the verification determined the Project Proponent has properly demonstrated the documented project grievance process was appropriately implemented during this verification period.

4.3.7 Worker Relations (G4.3 – G4.6)

The verification team reviewed information presented in the MR and conducted site interviews with Project Proponent representatives and employees of various project activities. Through site visit interviews, the verification team substantiated position-specific trainings were conducted to build capacity for community members hired into community engagement, biodiversity assessment, and carbon measurement and monitoring related positions. All employees interviewed stated that they had received training and considered it adequate. The verifiers substantiated through site visit interviews that most employees are from the local area, and most managerial positions had been filled by local community members who had worked their way up through the organization to earn their position. The verification team is reasonably assured that the substantiated capacity built during this verification period will not be lost.

Section 2.4.3 of the MR describes the process for filling job opportunities, referencing the CHCT Equal Opportunity Policy. Site visit observations and interviews with project employees and community members

substantiated positions were publicly advertised, and the general belief of those interviewed was that the hiring process is open, fair, and non-discriminatory. The verification team requested additional information regarding the number of women employed by the project. Based on the circumstances described by the Project Proponent, the verification team substantiated women are being provided a fair chance to fill positions for which they are qualified or can be trained, and all people from communities are given an equal opportunity to fill work positions. The verification team, however, is issuing a FAR for the next verifiers to assess the efforts by the Project Proponent to track and report on the number of women directly working on project activities in return for compensation (FAR listed in Section 2.6.1).

Relevant laws and regulations covering worker rights in Kenya are described in Section 2.4.4 of the MR and are consistent with those identified in the PD. The verifiers substantiated through site visit interviews with employees of the project that they were made aware of their rights, they believed they were being treated fairly, and to their knowledge their employment was in compliance with relevant labor laws and regulations. The verifiers substantiated employees employed on an unlimited basis had been provided with employment contracts, and fixed-term employees confirmed their status of employment. Additional clarification and supplemental documentation in the form of employment policies provided by the Project Proponent substantiated the project is in compliance with the identified labor laws and regulations.

The measures planned and undertaken for ensuring worker's safety are described in Section 2.4.5 of the MR and are consistent with those identified in the PD. The MR and PD both reference the "Health and Safety Plan" used for informing employees of risks and training for employees. The verification team requested a copy of the identified "Health and Safety Plan." The verification team reviewed the provided document and substantiated it adequately addresses risks identified for a range of different employees and provides information on minimizing these risks. Site visit observations and interviews with project employees substantiated they had received training related to safety and minimizing identified risks. Through review of project and supplemental documentation, substantiated by site visit interviews and observations, the verification team determined the project appropriately identified and minimized workplace risks, and the employees were well informed of the risks associated with employment by the project.

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

Information presented in the MR and provided to the verification team through supplemental materials substantiates the present project management team has demonstrated their expertise and ability to implement and manage this project over an extended period, and appropriate provisions exist to ensure the key technical and management skills are in place to continue to manage the project successfully over the project lifetime.

The verification team reviewed supplemental materials and conducted interviews with community leaders and members that substantiated the Project Proponent is taking appropriate steps to assist community groups to improve key technical, managerial, and governance skills that should help ensure continued local community involvement in project implementation over the project lifetime.

The Project Proponent provided the verification team with financial documents substantiating the financial health of the Project Proponent and the other project partners involved in project implementation. Review of these financial documents, along with site visit interviews with the Project Proponent and project partners, substantiated that the flow of REDD+ funds are adequate in supporting implementation of project activities.

Based on substantiation of information presented in the MR and through review of supplemental documentation and through site visit interviews with staff employed in project activities, the verification team concludes the Project Proponent has the capacity to continue implementing the project in accordance with the validated PD.

4.3.9 Legal Status (G5.1)

A list of laws and regulations considered relevant to the project are provided in Section 2.5.1 of the MR and are the same laws identified in the PD. The MR states the CHRP meets all local, national and international laws relating to the project. Site visit interviews with members of the Kenya Wildlife Service and Kenya Forest Service substantiated that project partners are not aware of any non-compliance with local or national laws and regulations. Additional clarification from the Project Proponent demonstrating how the project is in compliance with identified laws, substantiated by site visit interviews, provided the verification team *reasonable* assurance that the project is in compliance with all local or national laws and regulations.

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

The process for obtaining Free, Prior, and Informed Consent (FPIC) is described in Section 2.5.2 of the MR and was determined to have been appropriately attained through project validation. Site visit interviews with project partners and community leaders substantiated that the project is not encroaching uninvited on private property or government property, and the project obtained FPIC of the project partners and communities whose rights are affected by the project.

Section 2.5.2 of the MR states that the implementation and development of the project did not lead to the involuntary removal or relocation of any stakeholders. Site visit interviews with project partners, community leaders, and community members substantiated the project has not required the involuntary relocation of people or activities important for the livelihoods or culture of the communities, and project activities have been undertaken with the FPIC of the community members. Community members interviewed believed they are being justly and fairly compensated for participating in the project.

During the project review, the verification team identified the existence of an ongoing land dispute described in the PD. Site visit interviews substantiated this land dispute, referred to as the Mikulolo land dispute, involves land within the Chyulu Hills National Park portion of the project area. The Project Proponent provided additional clarification and supplemental documents for the verification team's review. The verification team reviewed the additional clarification and supplemental documents and determined that the ongoing land dispute does not require nor has required the involuntary relocation of property rights holders or of the activities important to their livelihoods and cultures. However, the verification team is issuing a FAR requesting the future verifiers to review the status of the legal dispute to ensure continued compliance with indicator G5.4 (FAR listed in Section 2.6.1).

Through review of project and supplemental documentation, site visit interviews and observations, and additional clarification from the Project Proponent, the verification team determined the Project Proponent has protected the rights of Indigenous Peoples, communities and stakeholders in accordance with the CCB Standards and the validated project design during this verification period.

4.3.11 Identification of Illegal Activities (G5.5)

Illegal activities that could affect the project's impacts are identified in Section 2.5.4 of the MR and are consistent with those identified in the PD. Illegal activities identified include charcoal burning, wood extraction for carvings, logging, and poaching. Site visit interviews and observations substantiated ranger patrols were undertaken to reduce and prevent illegal activities. The widespread community belief that illegal activities identified have been reduced based on understandings gained through implementation of project activities was observed. The Project Proponent identifies a need to scale up the intensity of these efforts as additional carbon revenue becomes available.

4.4 Climate

4.4.1 Accuracy of GHG Emission Reduction and Removal Calculations

Aster Global conducted an intensive review of all input data, parameters, formulae, calculations, conversions, statistics and resulting uncertainties and output data to ensure consistency with the VCS Standard, the validated PD, and VM0009. Data with associated conversion factors, formulae, and calculations were provided by the Project Proponent in spreadsheet format to ensure all formulae were accessible for review. The verification team recalculated subsets of the analyses to confirm correctness and assess if data transposition errors occurred to achieve a reasonable level of assurance and to meet the materiality requirements of the project, as required by the VCS Standard. The Project Proponent also provided answers to questions on calculations to ensure the verification team understood the approach and could confirm its consistency with VM0009 and the PD. The data and parameters used to calculate the GHG emission reductions and removals are summarized in a table in Section 5 of this report.

The verification team observed analysis methods during a calculation walkthrough meeting with the Project Proponent where the features of VM0009 were discussed. It was confirmed that the project's on-going analysis methods for monitoring conform with the methodology. The verification team reviewed the monitoring period inventory results independently and confirmed that data sources are suitable and in compliance with VM009 requirements.

Low intensity burning occurred during this monitoring period, which was witnessed during the site visit. Visual inspection of the Sentinel 2 and Landsat data indicated that burning tended to be low intensity and seasonal. Activity-shifting leakage was assessed through a review of field measurements.

Uncertainty calculations were reviewed in detail as prescribed by the methodology and confirmed. The uncertainty calculations resulted in a confidence deduction of 17.7% in grassland for this monitoring period. The verification team re-computed the uncertainty calculation and ensured the appropriate confidence deduction was applied to the final VCUs.

The methods and formulae set out in the PD for calculating baseline emissions, project emissions, and leakage were previously confirmed. The total end of the monitoring period carbon stocks in all project activities for all relevant pools resulting from carbon stock changes were correctly quantified. Analysis of project inventory data used appropriate formulae, conversions, and parameters, supported by scientific literature. Where ranges of parameters exist, or other types of formulaic uncertainty, appropriately conservative values were used in data analysis.

In conclusion, the quantification methods for GHG emission reductions and removals have been performed correctly and in accordance with the validated PD and VM0009.

4.4.2 Quality of Evidence to Determine GHG Emission Reductions and Removals

During this verification assessment, the evidence provided by the Project Proponent was sufficient in both quantity and quality to support the determination of GHG emission removals reported by the project. Throughout the verification, the Project Proponent demonstrated a commitment toward conservativeness and took all appropriate measures to ensure the reliability of evidence provided.

The threshold for materiality with respect to the aggregate of errors, omissions and misrepresentations relative to the total reported GHG emission reductions and/or removals was met for this project as defined in the Verification Sampling Plan. Materiality is a concept that errors, omissions and misrepresentations could affect the GHG reduction assertion and influence the intended users (ISO 14064-3:2006). As defined by VCS Version 4 the materiality is 1% for this large project.

The evidence provided to determine emission reductions reported in the MR included values, notations, units and sources. This evidence has been cross-checked with supplied emission reduction calculation spreadsheets. The procedure for data recording, transfer and final storage was also verified and found to be in compliance with the monitoring plan outlined in the PD. The Verification team confirmed through cross checks that adequate monitoring mechanisms are in place where the required parameters need to be monitored.

The verification team was provided access to the project's series of monitoring worksheets and inventory data, where monitoring data is compiled for quantification and reporting. These tools ensure accurate information flow for monitoring efforts. Section 3.1.3 of the MR provides additional detail on project data management methods and structure.

Interviews are outlined in Section 2.4 above, and the documents received from the Project Proponent supporting the determination of GHG removals is in Appendix A.

4.4.3 Non-Permanence Risk Analysis

The Chyulu Hills REDD+ Project Monitoring Report utilized the VCS AFOLU Non-Permanence Risk Tool to assess internal, external, and natural risk and mitigation measures for minimizing risk. The verification team reviewed the Non-Permanence Risk Report following VCS AFOLU Requirements and confirmed the project adheres to the requirements. The Verification team evaluated the rationale, appropriateness, and justifications of risk ratings chosen by the Project Proponent. Each risk factor was thoroughly assessed for conformance. Any identified NCR and/or CL finding related to the AFOLU Non-Permanence Risk Tool/Report are presented in Appendix B.

Risk Factor	Rationale & Quality	Conclusion
Internal Risks		
Project Management	The management team includes individuals that have the necessary skills and	A risk rating of -4 is appropriate given the rationale provided

	experience to implement all project activities. The Project Proponent has successfully managed projects that have generated GHG credits.	and all statements made are substantiated.
Financial Viability	Financial documents provided demonstrate the project has been operating in a cash positive state over the monitoring period.	A risk rating of 0 is appropriate given the rationale provided and supporting documentation reviewed by the verification team.
Opportunity Cost	The project baseline is subsistence driven and project activities have shown net positive community impacts. The project has received approval from Verra that the evidence provided to demonstrate the "legally binding commitment to continue management practices" is sufficient to claim the Opportunity Cost Mitigation	A risk rating of -2 is appropriate given the rationale provided and Verra's substantiated approval.
Project Longevity	The project has received approval from Verra that the evidence provided to demonstrate "legal agreement or requirement to continue the management practice" is sufficient to claim a risk score of 0.	A risk rating of 0 is appropriate given the rationale provided and Verra's substantiated approval.
Total Internal Risks		The project has a total Internal Risk score of 0 .
External Risks		
Land Tenure	The verification team substantiated the ownership and resource access use/rights are held by the same entity in some areas, and by different entities in others. The verification team substantiated there exists disputes over access/use rights. The project has received approval from Verra that the evidence provided to	A risk rating of 5 is appropriate given the rationale provided and Verra's substantiated approval.

	demonstrate the “legally binding commitment to continue management practices” is sufficient to claim the Land Tenure Mitigation.	
Community Engagement	The project has received CCB validation/verification demonstrating exceptional community benefit.	A risk rating of -5 is appropriate given the rationale provided.
Political Risk	Kenya participates in REDD+ Readiness under the FCPF. The Governance Score is - 0.57.	A risk rating of 2 is appropriate given the rationale provided.
Total External Risks		The project has a total External Risk score of 2 .
Natural Risks		
Natural Risk	All natural risks were appropriately identified and justified. Where necessary the verification team reviewed supporting evidence, including on interviews and observations. The verification team confirmed the risks for fire (2.5), pest and disease outbreak (2) and extreme weather (1) are appropriate.	A risk rating of 5.5 is appropriate given the rationale provided.
Total Natural Risks		The project has a total Natural Risk score of 5.5 .
Overall Risk Rating = 10 Non-Permanence Risk Rating = 10		

In summary, the Project Proponent has accounted for risk factors in a reasonable manner and has reached an overall risk rating that encompasses all risks of non-permanence. The project has applied the Non-Permanence Risk Rating of 10%. As required, risk will be reassessed and given risk scores at each verification period.

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

Section 3.1.4 of the MR describes actions taken to disseminate the results of the climate monitoring plan and results, noting that the full results of the monitoring are included in the MR. The verification team reviewed the steps taken to distribute the MR and publicize results of monitoring in greater detail in Section 4.3.5 of this report and determined that these measures were appropriate. The verification team determined the results of monitoring, and thus climate monitoring specifically, were disseminated in accordance with the validated project design.

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

Section 5.7.4 of the PD identifies four climate change risks and identifies potential effects and mitigative/adaptive strategies to be implemented. The four risks identified include more intense and longer droughts, seasonal rivers drying out, low capacity of local populations to adapt to frequent natural disasters, decreased biodiversity, loss of forest cover to drought, and temperature change. The verification team reviewed the activities and/or processes identified in Section 3.3.1 of the MR as implemented during this verification period to assist communities and/or biodiversity to adapt to the probable impacts of climate change. Site visit observations and interviews with project staff, project partners, community leaders, and community members substantiated that progress is being made through implementation or initiation of the potential mitigation/adaptive strategies identified in the PD. Through review of the MR and PD, substantiated by site visit interviews and observations, the verification team determined the activities implemented to assist communities and/or biodiversity to adapt to the probable impacts of climate change during this verification period delivered the intended impacts.

4.5 Community

4.5.1 Community Impacts (CM1.1)

The verification team reviewed the community impacts identified in the validated PD and methods identified in the PD for assessing these impacts as the basis for review of community impacts presented in the MR. The verification team concludes the methodology presented in the MR for measuring and monitoring impacts of the project on local communities is based on cause-and-effect logic (causal model) and associated theories of change presented in the validated PD. The verification team reviewed information provided in the MR, supplemental materials provided by the Project Proponent, and interviews with Project Proponent representatives, community leaders, and community members to assess the general quality and accuracy of the impact assessment.

Based on this assessment, the verification team determined the project used appropriate methodologies to estimate impacts on communities resulting from planned project activities. The PD defines the project zone communities as belonging to either the Eastern or Western side of the Chyulu Hills, and it further identifies constituent groups within the Eastern and Western communities. Section 4.1.1 of the MR identifies the three key issues in the community component initially identified in the PD as high levels of poverty and livelihood vulnerability, food insecurity, and poor education standards. Table 15 of the MR describes positive impacts associated with the communities identified for each of the three identified issues. Site visit interviews with community stakeholders support the assertions for positive impacts identified, and community members from both Eastern and Western communities agreed the project supported the communities in either reaching or making progress towards project goals. Through review of project and supplemental documents and site visit interviews and observations, the verification team determined the activities reported as having occurred during this verification period were appropriately implemented by the Project Proponent and that the assessment of impacts is accurate.

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

The verification team reviewed the community impacts identified in the MR. The verification team was provided with additional clarification and supplemental information that confirmed assertions of positive impacts for specific community groups. Interviews with community stakeholders from various identified

community groups supported the assertions of positive impacts from the project on the key focal issues. Community members interviewed during the site visit agreed the project strongly supported the communities, and interviewees endorsed the continuation of the project. The onsite interviews supported findings that the project has positive impacts equally benefiting women and men and positive impacts for vulnerable members of the communities. The verification team concluded that based on review of the documentation provided and results of on-site visits and interviews, the net impact of project activities on all community groups is positive.

4.5.3 Protection of High Conservation Values (CM1.2)

The verification team reviewed the HCVs identified in Section 6.1.2 of the PD, which included forests critical to water catchment, grassland for the prevention of soil erosion, and areas providing provisioning services, such as poles for building material, fodder, fuel, and medicinal plants. Site visit observations and interviews substantiated the implementation or initiation of several project activities designed to maintain or enhance the HCVs, as identified in Section 4.1.3 of the MR. Site visit interviews substantiated the general belief of those interviewed that the implementation of project activities has not negatively affected HCVs. Through the substantiation of the implementation or initiation of project activities to maintain or enhance HCVs paired with the general belief that HCVs were not negatively impacted during this monitoring period, the verification team determined that identified HCVs were not negatively affected by the project.

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

The verification team reviewed the potential negative well-being impacts on other stakeholders and plans to mitigate these potential impacts as identified in Section 6.2.1 of the PD, which included potentially negative impacts to charcoal traders who illegally extract resources from the project area and the potential heightened risk of impacts from human-wildlife conflict as wildlife numbers increase. Through site visit interviews with community leaders and community members, the verification team substantiated the actions identified as taken in Section 4.2.1 of the MR occurred during this verification period, and the actions taken to mitigate potential human-wildlife conflicts in the project area also minimize the potential for offsite human-wildlife conflicts. The MR identifies impacts to charcoal traders who illegally extract resources from the project as temporary, and site visit interviews with project staff and partners substantiate that the project may provide direct or indirect opportunities for legal livelihoods for illegal charcoal traders to mitigate the potential negative impact. Site visit interviews with project staff, project partners, and community members revealed the project's achievements to date and anticipated achievements have led to several offsite groups and communities expressing interest in participating in the project. Overall, the verification team determined that the project has appropriately implemented measures to mitigate the potential negative impacts to other stakeholders, and the suggestion that other stakeholders are interested in participating in the project substantiated the net impacts of project activities on the well-being of other stakeholders is not negative.

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

The verification team reviewed the PD, as well as a copy of the separate Chyulu Hills Community and Biodiversity Monitoring Plan (CBMP) that was provided as supplemental documentation. The verification team undertook a review of the community monitoring results identified in Section 4.3.2 and Annex I of the MR against the community variables identified for monitoring by the PD and CBMP and the frequency and methods identified for monitoring and reporting on results. The review confirmed that communities, community groups, other stakeholders, and HCVs related to community well-being are identified in the

CBMP. Community variables monitored are identified in the MR. The verification team identified inconsistencies in frequency of monitoring or survey methods for several community indicators during this verification period compared to the CBMP. With additional clarification and review of supplemental documentation from the Project Proponent, the verification team determined this discrepancy can be included as a minor change to the PD (See Section 3.4 of this report). The minor change to the PD and the variables that were not monitored during this verification report were appropriately reported in the final version of the MR. Based on information and explanation provided by the Project Proponent, review of the CBMP and supporting documentation provided, and results of interviews with community members, the verification team determined that the overall intent of the CBMP had been met for the key indicators; the community monitoring deviations constituted minor changes that did not result in substantive over or under reporting of positive or negative impacts. The overall impact of the project on community well-being was confirmed as positive. The results reported in the MR were determined to accurately reflect monitored community impacts.

4.5.6 Community Monitoring Plan Dissemination (CM3.3)

The verification team reviewed information presented in Section 4.3.3 of the MR and confirmed the full results of the community monitoring are included in the Project MR as stated. The verification team reviewed the PD and the supplemental CBMP provided by the Project Proponent and substantiated the plans for disseminating monitoring reports are consistent between the two documents. As described in greater detail in Section 4.3.5 of this verification report, the verification team reviewed the steps taken to distribute the MR and publicize results of monitoring and determined these measures were appropriate. Site observations and site interviews substantiate the MR has been made available in project partner offices for public review. Site observations noted that the MR Summary had been posted on two community information boards reviewed, including presentation of some information in Swahili. Site visit interviews substantiate that many of the community members interviewed had either been made aware of the availability of monitoring results or were confident that information would be provided to them by the community representatives from the Project Office. The verification team determined the results of monitoring, and thus community monitoring specifically, was disseminated in accordance with the validated PD.

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

The verification team reviewed the potential barriers or risks presented in Section 6.3.3 of the PD potentially preventing benefits from reaching poorer households and measures to mitigate these risks. Potential barriers or risks identified include elite capture, fewer chances of formal employment, and no representation in decision making processes. The verification team reviewed Section 4.4.1 of the MR that describes mitigation of these potential barriers or risks. The verification team substantiated through review of review of project support documents provided by the Project Proponent, site visit interviews, and observations that project management staff has implemented controls to ensure project funds are used as intended and that employment opportunities do not exclude community members from poorer households. Site visit observations and interviews substantiated the transparency of project activity funding, mitigating the concern for elite capture. Site visit interviews substantiated that livelihood programs supported by the project are targeted toward poorer households and that members from poorer households have opportunities to provide input and participate in decision-making.

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

The verification team reviewed Section 4.4.2 of the MR that identifies poorer households and women as vulnerable groups and describes impact aversion and mitigation measures taken during this verification period. Site visit observations and site visit interviews with project staff, project partners, and community members substantiated the implementation or initiation of project activities identified in the MR for avoiding and mitigating negative impacts to the identified groups. Site visit observations and interviews substantiate project sponsorship or support of women's groups and other community groups for livelihood improvement opportunities, consideration of vulnerable groups by school bursaries, and the improvement of healthcare opportunities that benefit the identified vulnerable groups. Through review of project documents supported by site visit interviews and observation, the verification team substantiated the project has been successful in fulfilling the requirements of this Gold Level Indicator for this verification period.

4.6 Biodiversity

4.6.1 Biodiversity Changes (B1.1)

The verification team reviewed the methodologies used to estimate changes in biodiversity as a result of the project that are described in the PD and were determined to be appropriate during project validation. The verification team reviewed project documents and supporting documentation provided by the Project Proponent. The verification team substantiated through site visit interviews and observations the accuracy of data collected for several project activities, including biomass monitoring, assessing disturbance, regeneration, vegetation biodiversity, and monitoring of keystone wildlife species. Through site visit interviews and observations, the verification team substantiated the ecosystem enhancement and biodiversity activities undertaken by the project during this verification, and the verification team substantiated the resultant positive impacts on biodiversity from the 'with project' scenario when compared to the baseline 'without project' scenario. Given the substantiated accuracy of data collected and the substantiated positive impacts on biodiversity through implementation of project activities, the verification team determined the project's assessment of changes in biodiversity resulting from project activities in the project zone during the verification period is accurate.

4.6.2 High Conservation Values Protected (B1.2)

The verification team reviewed the biodiversity-related HCVs identified in the PD, including endangered and vulnerable plant and animal species, endemic subspecies and races, significant concentrations of a species during any time in their life cycle, viable populations of plants and animals in natural patterns of distribution and abundance, and threatened ecosystems. Site visit interviews and observations identified no negative effects on identified HCVs and substantiated the habitat and wildlife protections and enhancement activities implemented or initiated were or are likely to result in positive effects on the identified HCVs.

4.6.3 Invasive Species (B1.3)

Section 5.1.3 of the MR states that no non-native species will be used in the project area, and project activities that include planting or reforestation are implemented with indigenous tree species from the area. Through visiting multiple planting instances and activities and conducting interviews, the verifiers substantiated all species used in project activities were native or long-established or used in the area, and none are considered or listed as invasive. Instances and activities observed by the verifiers during the site

visit include review of a grass seedbank project and visits to a representative tree planting area, a tree nursery, and project supported beehives. These visits and the associated interviews substantiate the project uses no species considered or listed as invasive species, and the verification team is reasonably assured no invasive species are or will be used in project activities.

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

Section 5.2.3 of the MR states no non-native species were used in the project activities. Site visit interviews and observations described in Section 4.6.3 of this report substantiated that non-native species are not currently being used in project activities for restoration of degraded areas or other habitat maintenance or enhancement project activities. Site visit interviews with Kenya Forest Service and community representatives from the community group's tree nursery that was visited during the site visit substantiated that non-native species are not reported as used or planned to be used in natural areas, and non-native species present at the tree nursery were species long-established and utilized in Kenya and identified for use in gardens and around other habitation areas. Through review of supporting documentation, site visit interviews, and site visit observations, non-native species were not identified in areas visited by the verification team undergoing restoration plantings. The verification team determined use of non-native species in gardens and around other habitation areas is justified and will not pose harm to the region's environment.

4.6.5 GMO Exclusion (B1.5)

The verification team reviewed the PD Section 7.1.5 that attests no GMOs will be used to generate GHG emissions reductions or removals; the team reviewed Section 5.1.5 of the MR that attests no GMOs were used in implementation of project activities during this verification period to generate GHG emissions reductions or removals. Site visit observations and interviews substantiate trees used in restoration of degraded areas and grasses grown in the grass seed banks are derived from locally sourced, indigenous species. During the site visit, the verifiers identified no source of GMOs that would be used to generate GHG emissions reductions or removals. The verification team is reasonably assured that no GMOs were or will be used in project activities to generate GHG emissions reductions or removals.

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

Section 5.2.1 of the MR provides justification for the project's determination that negative impacts on biodiversity outside of the project area are unlikely. Site visit observations and site visit interviews with project partners and community members substantiate the justification provided in Section 5.2.1. The verifiers did not identify any additional potential negative offsite impacts through site visit interviews and observations. As no negative offsite biodiversity impacts were identified by the Project Proponent or observed by the verifiers during the site visit, the verification team determined that no mitigation actions were warranted.

4.6.7 Net Biodiversity Benefits (B2.3)

Section 5.2.2 of the MR describes several positive impacts to biodiversity within the project zone. Positive biodiversity impacts were substantiated by the verification team through review of supporting documents, site visit interviews, and site visit observations. The verification team determined the net biodiversity impacts of the project are positive for this verification period based on substantiation of positive biodiversity impacts and the absence of any identified negative offsite biodiversity impacts that would require mitigation.

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

The verification team reviewed the PD, as well as a copy of the separate CBMP that was provided as supplemental documentation. The verification team undertook a review of the biodiversity monitoring results identified in Section 5.3.2 of the MR against the biodiversity variables identified for monitoring by the PD, CBMP, Monitoring & Implementation Report (M&IR) covering the period 2014-2016; the team further reviewed the frequency and methods identified for monitoring and reporting on results. Following additional clarification provided by the Project Proponent, the verification team determined biodiversity indicators and HCVs related to biodiversity identified in the CBMP are appropriately addressed as biodiversity variables to be monitored and reported in the MR. The review determined that dates, frequency, and sampling methods used were not in full accordance with the validated design. The verification team identified inconsistencies in several of the biodiversity variables identified to be monitored in the PD when compared to the monitoring that occurred during this verification period. With additional clarification and review of supplemental documentation from the Project Proponent, the verification team determined this discrepancy can be included as a minor change to the PD (See Section 3.4 of this report). The minor change to the PD and the variables that were not monitored during this verification report were appropriately reported in the final version of the MR. Based on information and explanation provided by the Project Proponent, review of the CBM, M&IR, and supporting documentation provided, and results of interviews with community members, the verification team determined that the overall intent of the CBMP had been met for the key indicators and that the deviations constituted minor changes that did not result in substantive over or under reporting of positive or negative impacts. The verification team determined from review of supporting documents, site visit interviews, and site observations that measures taken to maintain or enhance all identified biodiversity HCVs, as reported, have been effective during this verification period.

4.6.9 Biodiversity Monitoring Plan Dissemination (B3.3)

The verification team reviewed information presented in Section 5.3.3 of the MR and confirmed the full results of the biodiversity monitoring are included in the MR, as stated. The verification team reviewed the PD and the supplemental CBMP provided by the Project Proponent and substantiated the plans for disseminating monitoring reports are consistent between the two documents. The verification team reviewed the steps taken to distribute the MR and publicize results of monitoring, as described in greater detail in Section 4.3.5 of this verification report, and the team determined that these measures were appropriate. The verification team determined the results of monitoring, and thus biodiversity monitoring specifically, were disseminated in accordance with the validated PD.

4.7 Additional Project Implementation Information

No additional project implementation is relevant for reporting here, as details on project implementation are included in preceding sections.

4.8 Additional Project Impact Information

The project has been able to demonstrate impacts to all CCB indicators as mentioned throughout this report, in addition to achieving CCB Gold Level. No further steps to verify additional monitoring were warranted. The reported project impact information was sufficient and suitable for the verification of the project's CCB impacts.

5 VERIFICATION CONCLUSION

After a site inspection and review of all project information, procedures, calculations, and supporting documentation, Aster Global Environmental Solutions, Inc., confirms the Project is accurate, consistent, and complies with all VCS Version 4 criteria, CCB Second Edition criteria, the selected methodology (VM0009), and the validated PD. Aster Global confirms The Chyulu Hills REDD+ Project 2nd Monitoring Report (Version 3.4, dated 31 December 2020) has been implemented in accordance with VCS Version 4 and CCB Second Edition criteria.

Aster Global confirms all verification activities – including objectives, scope and criteria, *reasonable* level of assurance, and PD implementation adherence to VCS Version 4 (and all associated updates) and CCB Project Design Standards (Second Edition), as documented in this report – are complete. Aster Global concludes without any qualifications or limiting condition The Chyulu Hills REDD+ Project 2nd Monitoring Report (Version 3.4, dated 31 December 2020) meets the requirements of VCS Version 4 (and all associated updates), CCB Project Design Standards (Second Edition), and the validated PD. In addition, Aster Global asserts the project complies with the criteria for projects set out in the Second Edition of the CCB Standards to achieve Gold Level distinction for Climate, Community, and Biodiversity.

The GHG assertion provided by Chyulu Hills Conservation Trust and verified by Aster Global has resulted in Gross Emissions Reductions and/or Removals (GERs) of 4,342,754 tCO₂ equivalents (CO₂e) by the project during the verification period/reporting period (VCS and CCB: 01 January 2017 – 31 December 2020; 4 years). This value is gross of the 10% (434,275) tCO₂e buffer withholding based on the non-permanence risk assessment tool and associated leakage allocation. This results in 3,139,694 tCO₂e of credits eligible for issuance as VCUs.

Verification/monitoring period: From 01 January 2017 to 31 December 2020

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

Vintage Period	GERs (tCO ₂ e)	Baseline emissions or removals (tCO ₂ e)	Project emissions or removals (tCO ₂ e)	Confidence deduction (tCO ₂ e)	Leakage emissions- linear (tCO ₂ e)	Buffer (tCO ₂ e)	Net GHG emission reductions or removals (tCO ₂ e)
2017	1,084,945	2,008,130	-1,639	-4,385	-140,613	-108,495	831,453
2018	1,084,945	2,131,278	0	-4,771	-170,813	-108,495	800,866
2019	1,084,945	2,260,401	-5,433	-5,048	-201,013	-108,495	770,389
2020	1,087,918	2,603,910	-9,818	-10,204	-231,936	-108,792	736,986
Total	4,342,754	9,003,718	-16,890	-24,408	-744,376	-434,275	3,139,694

APPENDIX A: DOCUMENTS LIST

Name	Date Received
working_20210202.xlsx	7/13/2021
SIA Analysis_20210202.docx	7/13/2021
CommunityIndicatorsMonitoringReport2020.xlsx	7/13/2021
CommunityIndicatorsMonitoringReport2020.pdf	7/13/2021
CommunityIndicatorsMonitoringReport2020.docx	7/13/2021
CHCT Board Meeting minutes 20201215.docx	7/13/2021
KWS 2020 001 Community outreach.pdf	7/13/2021
MWCT 2017 Audited Financial Statements.pdf	7/13/2021
MWCT 2018 Audited Financial Statements.pdf	7/13/2021
Final Completion Report AffD Chyulu Hills.pdf	7/13/2021
NPR ProjectZambia.pdf	7/13/2021
CHCT Board Meeting minutes 20200312-1.pdf	7/13/2021
CHCT board meeting 12.03.2020.pdf	7/13/2021
Grassland collection form.xml	7/13/2021
Forest collection form.xml	7/13/2021
allPlots.docx	7/13/2021
ProjectArea_BurnedArea_2017.jpg	7/13/2021
4 sets for Western Region Meetings.0005.pdf	7/13/2021
4 sets for Western Region Meetings.0004.pdf	7/13/2021
4 sets for Western Region Meetings.0006.pdf	7/13/2021
4 sets for Western Region Meetings.0009.pdf	7/13/2021
4 sets for Western Region Meetings.0010[2].pdf	7/13/2021
4 sets for Western Region Meetings.0011[2].pdf	7/13/2021
4 sets for Western Region Meetings.0007[2].pdf	7/13/2021
4 sets for Western Region Meetings.0008.pdf	7/13/2021
Rombo meeting allowance 1st.pdf	7/13/2021
4 sets for Western Region Meetings.0012.pdf	7/13/2021
4 sets for Western Region Meetings.0002.pdf	7/13/2021
4 sets for Western Region Meetings.0013.pdf	7/13/2021
4 sets for Western Region Meetings.0003.pdf	7/13/2021
4 sets for Western Region Meetings.0001[2].pdf	7/13/2021
PAA_burntArea_byBoundary_byYear_2017_2020.svg	7/13/2021
PAA_burntArea_byStrata_byYear_2017_2020.svg	7/13/2021
PAA_burntArea_byBoundary_total_2017_2020.svg	7/13/2021
PAA_burntArea_byStrata_2017_2020.svg	7/13/2021
burntArea_historic_2000-2019.svg	7/13/2021
PAA_burntArea_byStrata_2000_2019_alt2.svg	7/13/2021
PAA_burntArea_vs_year_2000-2019.svg	7/13/2021
PAA_burntArea_byStrata_2000_2019_alt1.svg	7/13/2021
PAA_burntArea_byStrata_2000_2019_alt3.svg	7/13/2021

PAA_burntArea_vs_strata_x_year_2000-2019.svg	7/13/2021
PAA_burntArea_vs_year-month_2000-2019.svg	7/13/2021
PAA_burntArea_vs_date_2000-2019.svg	7/13/2021
BurntArea_Monitoring_2017_2020.gdb.zip	7/13/2021
Agenda outreaches 2018_2019.docx	7/13/2021
REDD+Minute for Eastern side complete March 2018.docx	7/13/2021
Chyulu REDD Due Dilligence 2020_06_24.docx	7/13/2021
Spending priority analysis 20190228.xlsx	7/13/2021
Financial analysis v1 verification 20210429 FINAL.xlsx	7/13/2021
Forest collection form.xlsx	7/13/2021
FinancialAnalysis2017-2020.xlsx	7/13/2021
Rombo outreach grant report 2019.docx	7/13/2021
Grassland collection form.xlsx	7/13/2021
Cyhulu Hills REDD+_Botanical Report.pdf	7/14/2021
ChyuluHills_FireMonitoringData_2017_2020_Historic_2001_2019.xlsx	7/14/2021
210616_Biomass_2020.xlsx	7/14/2021
~\$Chyulu Hills_Forest_NERs.xlsm	7/14/2021
Chyulu Hills_Grassland_NERs.xlsm	7/14/2021
REDD-Factsheet-asofAug04.compressed.pdf	7/14/2021
CHCT_Equal Opportunity Policy.pdf	7/14/2021
ChyuluHillsREDDProjectGrievanceProcedure.pdf	7/14/2021
CHCT_Equal Opportunity Policy.docx	7/14/2021
1_Internal_risks.rar	7/14/2021
ChyuluHills_projectBoundaries_v2.gdb.zip	7/14/2021
2020 MWCT Impact Report.pdf	7/14/2021
~\$S-Non-Permanence-Risk-Report.docx	7/14/2021
VCS-Non-Permanence-Risk-Report.docx	7/14/2021
Forest leak final.xlsx	7/14/2021
6. Leakage plots update Final.pdf	7/14/2021
Forest leak final May 2021.xlsx	7/14/2021
3_Natural_risks.rar	7/14/2021
SOP - Chyulu Hills - Forest Leakage 04-15-2014[4].pdf	7/14/2021
SOP - Chyulu Hills Leakage Grassland 2014-04-15[4].pdf	7/14/2021
Grassland media from the field.zip	7/14/2021
ClimateExtremes.pdf	7/14/2021
REDD_Chyulu_firesAnalysis_annotated.pdf	7/14/2021
SIA Analysis_020221.docx	7/14/2021
2_External_risks.rar	7/14/2021
Chyulu REDD Due Dilligence 2020_06_24.docx	7/14/2021
ChyuluHills_PA_MODIS_Fires-by-area.png	7/14/2021
ProjectArea_BurnCount_historic_2001_2019.jpg	7/14/2021
ProjectArea_BurnedArea_2019.jpg	7/14/2021
ProjectArea_LastBurn_historic_2001_2019.jpg	7/14/2021

ProjectArea_BurnedArea_2020.jpg	7/14/2021
ProjectArea_BurnCount_historic_2001_2019.pdf	7/14/2021
ChyuluHills_PA_MODIS_Fires-by-date.png	7/14/2021
ProjectArea_BurnedArea_2017.pdf	7/14/2021
ProjectArea_BurnedArea_2019.pdf	7/14/2021
ProjectArea_LastBurn_historic_2001_2019.pdf	7/14/2021
ProjectArea_BurnedArea_2020.pdf	7/14/2021
210710_ChyluluHills_MR_VCS_CCB_final.docx	7/14/2021
Conflicts and Grievances.docx	7/14/2021
CV_Beatriz_Zapata.pdf	7/14/2021
CV_Jhoanata_Bolivar Cardona.pdf	7/14/2021
~\$260521_Cash_flow_REDD+_Chyulu Hills USD.xlsx	7/14/2021
CV_Sara_Betancur.pdf	7/14/2021
ChyuluHillsREDDProjectGrievanceProcedure.pdf	7/14/2021
Amos Apple Social Study.docx	7/14/2021
HH Survey East.docx	7/14/2021
HH Survey West.docx	7/14/2021
Community meetings.zip	7/14/2021
CCB_PROJ_DESC_ENG_1408_23JUN2015_V1.42.pdf	7/14/2021
SIA Analysis_020221.docx	7/14/2021
VERIF_REP_1408_19SEP2013_31DEC2016.pdf	7/14/2021
MONIT_REP_1408_19SEP2013_31DEC2016_V3.3_pdf.pdf	7/14/2021
Worldwide Governance Indicators.xlsx	7/14/2021
2020_USAID_RISK.pdf	7/14/2021
ThinkHazard_Kajiado.pdf	7/14/2021
2020 MWCT Impact Report.pdf	7/14/2021
Chyulu Hills Climate Monitoring Plan v1.0.docx	7/14/2021
CHCT Board Meeting minutes 20201215.docx	7/14/2021
KWS 2020 001 Community outreach.pdf	7/14/2021
CHCT board meeting 12.03.2020.pdf	7/14/2021
CHCT Board Meeting minutes 20200312-1.pdf	7/14/2021
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Agenda outreaches 2018_2019.docx	7/14/2021
REDD+Minute for Eastern side complete March 2018.docx	7/14/2021
Rombo meeting allowance lst.pdf	7/14/2021
Rombo outreach grant report 2019.docx	7/14/2021
4 sets for Western Region Meetings.0012.pdf	7/14/2021
280521_Cash_flow_REDD+_Chyulu Hills USD.xlsx	7/14/2021
Chyulu Hills_Forest_NERs.xlsm	7/14/2021
Grassland leak final may 2021.xlsx	7/14/2021
Chyulu REDD Due Dilligence 20210430docx.docx	7/14/2021
Annex 4 - SOP - Chyulu Soil Field Sampling v3.1 04-14-2014.pdf	7/30/2021
Annex 5 - SOP - Soils Bulk Density v1.4 2014-04-14.pdf	7/30/2021
Annex 7 - SOP - Chyulu Hills Leakage Grassland 04-15-2014.pdf	7/30/2021
Annex 6 - SOP - Chyulu Hills - Forest Leakage 04-15-2014.pdf	7/30/2021
Annex 8 - Standard Operating Procedure - Disturbance Monitoring - v1.0_2012-10-02.docx	7/30/2021
REDD_Chylulu_firesAnalysis_annotated.pdf	7/30/2021
210616_Biomass_2020.xlsx	7/30/2021
Annex 3 - Standard Operating Procedure Chyulu - Biomass v2.8.1_2014-02-03.docx	7/30/2021
Annex 8 - Standard Operating Procedure - Disturbance Monitoring - v1.0_2012-10-02 (1).docx	7/30/2021
ProjectArea_Chylulu.zip	8/4/2021
2. Sectiion5.5.1.3_LeakageArea_Plots_sm.jpg	8/4/2021
Biomass plots.kml	8/4/2021
Chylulu Hills Project boundary.kml	8/4/2021
Biomass completed 02.04.2021.pdf	8/4/2021
Forest leakage plots.kml	8/4/2021
grassland leakage plots.kml	8/4/2021
grassland.kml	8/4/2021
2. Section5.5.1.1_LeakageArea.pdf	8/4/2021
fire 2020 from SP analysis.kml	8/4/2021
OneDrive_1_8-4-2021.zip	8/4/2021
GIS_data.zip	8/4/2021
a00000001.freelist	8/4/2021
a00000001.gdbindexes	8/4/2021
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a00000005.CatItemTypesByUUID.atx	8/4/2021
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ProjectArea.shp	8/4/2021
ProjectArea.shp.xml	8/4/2021
ProjectArea.shx	8/4/2021
a000000b4.gdbtable	8/4/2021
ChyuluHills_eval_allometric_equations_final.R	9/1/2021
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Trees_database_3.csv	9/1/2021
Tree_biomass_calculation.csv	9/1/2021
LULC_Chylulu_Hills.zip	9/1/2021
Q3 - 2018 MWCT REPORT.pdf	9/1/2021
MWCTQ4REPORTsm-2017.pdf	9/1/2021
Q2-2018-MWCT-REPORT.pdf	9/1/2021
Q3-2019-MWCT-REPORT-1.pdf	9/1/2021

Q1-2018-MWCT-REPORT.pdf	9/1/2021
Q2-2020-MWCT-REPORT.pdf	9/1/2021
Q2-2019-MWCT-REPORT-comp.pdf	9/1/2021
Q1-2019-MWCT-REPORT.pdf	9/1/2021
Q1-2021-MWCT-REPORT-min.pdf	9/1/2021
Q3-2020-MWCT-REPORT.pdf	9/1/2021
Q2 - 2021 MWCT REPORT-min.pdf	9/1/2021
Q4-2020-MWCT-REPORT-copy.pdf	9/1/2021
Q4-2018-MWCT-REPORT.pdf	9/1/2021
Q4-2019-MWCT-REPORT-sm.pdf	9/1/2021
Q1-2020-MWCT-REPORT.pdf	9/1/2021
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ProjectArea_StraraAll.dbf	9/1/2021
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ProjectArea_StraraAll.shx	9/1/2021
ProjectArea_StraraAll.shp	9/1/2021
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4 sets for Western Region Meetings.0004.pdf	1/1/2022
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Rombo meeting allowance lst.pdf	1/1/2022
CHCT board meeting 12.03.2020.pdf	1/1/2022
CHCT Board Meeting minutes 20200312-1.pdf	1/1/2022
REDD+Minute for Eastern side complete March 2018.docx	1/1/2022
Agenda outreaches 2018_2019.docx	1/1/2022
CHCT Board Meeting minutes 20201215.docx	1/1/2022
KWS 2020 001 Community outreach.pdf	1/1/2022
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3. Soil sampling working Sunday 2016.zip	1/1/2022

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Chyulu Hills REDD Project Grievance Procedure GRIEVANCE PROCEDURE.pdf	1/1/2022
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CHRP MR_PIR Summary - Maa.docx	1/1/2022
2_External_risks.rar	1/1/2022
VCS-Risk-Report-Calculaton-Tool-v4.0.xls	1/1/2022
ChyuluHillsREDDProjectGrievanceProcedure.pdf	1/1/2022
CHRP MR_PIR Summary - Swa.docx	1/1/2022
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CHCT Employment Policies.pdf	1/1/2022
CHCT_Equal Opportunity Policy.docx	1/1/2022
CHCT_Equal Opportunity Policy.pdf	1/1/2022
Conflicts and Grievances.docx	1/1/2022
REDD-Factsheet-asofAug04.compressed.pdf	1/1/2022
Allometry for PD v02.pdf	1/1/2022
2020 MWCT Impact Report.pdf	1/1/2022
2020_Proxy_plots_LandCover.xlsx	1/1/2022
Chyulu Hills_Forest_NERs_V2_copia seguridad.xlsm	1/1/2022
FirstMonitoring_Chylulu Hills Project Area VER estimates v14_thesPoly.xlsx	1/1/2022
Grassland leakage_final.xlsx	1/1/2022
ChyuluHills_FireMonitoringData_2017_2020.xlsx	1/1/2022
Cyhulu Hills REDD+_Botanical Report.pdf	1/1/2022
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CHCT Health and Safety Plan v4.pdf	1/1/2022
follow up letter from Community.docx	1/1/2022
GRIEVANCE RECORDING Mbirikani May 2020.docx	1/1/2022
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thumb_IMG_7193_1024.jpg	1/1/2022
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Grievience - 12-07-2016-001.xlsx	1/1/2022
CHCT Sampling Team Response.docx	1/1/2022
Final Completion Report AffD Chyulu Hills.pdf	1/1/2022
Chyulu REDD+ Project Jan. 2020 - Dec. 2020 FAS+ct.xls	1/1/2022
REDD+ Project Bank Statement 20191231.pdf	1/1/2022
Chyulu REDD+ Project 201712 - 20191231 FAS.xls	1/1/2022

Chyulu REDD+ Project Jan. 2021 - Mar. 2021 FAS+ct.xls	1/1/2022
KWS 2020 001 Community outreach.pdf	1/1/2022
NPRA financial narrative 20210429 FINAL.pdf	1/1/2022
Chyulu REDD Due Dilligence 2020_06_24.docx	1/1/2022
CHCT Board Meeting minutes 20201215.docx	1/1/2022
BLF MOU with MGR_signed.pdf	1/1/2022
Heads Of Agreement (Kuku,MWCT).pdf	1/1/2022
Chyulu REDD Due Dilligence 20210430docx.docx	1/1/2022
Rombo Group Ranch Agreement.pdf	1/1/2022
PETITION.pdf	1/1/2022
Rombo Management Agreement.pdf	1/1/2022
The petitioners.pdf	1/1/2022
Management Agreement (Kuku,CEL,MWCT).pdf	1/1/2022
Grievance Response Letter - KYA - 20161218.pdf	1/1/2022
KUKU A management agreement.pdf	1/1/2022
CommunityIndicatorsMonitoringReport2020.docx	1/1/2022
CommunityIndicatorsMonitoringReport2020.pdf	1/1/2022
~\$CommunityIndicatorsMonitoringReport2020.xlsx	1/1/2022
MWCT 2018 Audited Financial Statements.pdf	1/1/2022
MWCT 2017 Audited Financial Statements.pdf	1/1/2022
SIA Analysis_20210202.docx	1/1/2022
SIA Analysis_020221 Household Survey.docx	1/1/2022
ChyuluHills_eval_allometric_equations_final_24Nov.R	1/1/2022
Trees_database_4.csv	1/1/2022
ChyuluHills_FireMonitoringData_2017_2020_V2.xlsx	1/1/2022
Effects of fire Trees_REDD+ Biomass.docx	1/1/2022
20211209_Landcover_Proxy_Plots_2020_T.jpg	1/1/2022
20211209_Landcover_Proxy_Plots_2020_T.pdf	1/1/2022
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Forest leak final.xlsx	1/1/2022
SOP - Chyulu Hills Leakage Grassland 2014-04-15[4].pdf	1/1/2022
ClimateExtremes.pdf	1/1/2022
REDD_Chylulu_firesAnalysis_annotated.pdf	1/1/2022
Grassland media from the field.zip	1/1/2022
Chyulu Hills_Forest_NERs_V2.xlsm	1/1/2022
Chyulu Hills_Grassland_NERs_V2.xlsm	1/1/2022
6. Leakage plots update Final.pdf	1/1/2022
Grassland leak final may 2021.xlsx	1/1/2022
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PAA_burntArea_byStrata_2000_2019_alt2.svg	1/1/2022
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PAA_burntArea_vs_date_2000-2019.svg	1/1/2022
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PAA_burntArea_byStrata_byYear_2017_2020.svg	1/1/2022
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21059.00_ChyluluHills_Round_1_Findings_sbe_lhe (2).xlsx	1/1/2022
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CV_Jhoanata_Bolivar Cardona.pdf	1/1/2022
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CV_Sara_Betancur.pdf	1/1/2022
280521_Cash_flow_REDD+_Chylulu Hills USD.xlsx	1/1/2022
CV_Beatriz_Zapata.pdf	1/1/2022
CV_Jhoanata_Bolivar Cardona.pdf	1/1/2022
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CV_Sara_Betancur.pdf	1/1/2022
ChyluluHillsREDDProjectGrievanceProcedure.pdf	1/1/2022
Amos Apple Social Study.docx	1/1/2022
HH Survey East.docx	1/1/2022
HH Survey West.docx	1/1/2022
Community meetings.zip	1/1/2022
CCB_PROJ_DESC_ENG_1408_23JUN2015_V1.42.pdf	1/1/2022
SIA Analysis_020221.docx	1/1/2022
VERIF_REP_1408_19SEP2013_31DEC2016.pdf	1/1/2022
Worldwide Governance Indicators.xlsx	1/1/2022
2020_USAID_RISK.pdf	1/1/2022
MONIT_REP_1408_19SEP2013_31DEC2016_V3.3_pdf.pdf	1/1/2022
Chylulu Hills Climate Monitoring Plan v1.0.docx	1/1/2022

ThinkHazard_Kajiado.pdf	1/1/2022
2020 MWCT Impact Report.pdf	1/1/2022
20150206RomboTitleDeed.pdf	1/1/2022
Kuku Group Ranch Title Deed.pdf	1/1/2022
Title Deed Mbirikani Group Ranch.pdf	1/1/2022
Kuku A Title Deed.pdf	1/1/2022
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TWDeedMap.jpeg	1/1/2022
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KYA meeting 20170209.docx	1/1/2022
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Grievance Response Letter - KYA - 20161218.pdf	1/1/2022
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Kuku Doc.pdf	1/1/2022
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._GRIEVANCE RECORDING Mbirikani May 2020.docx	1/1/2022
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Forest leak final May 2021.xlsx	1/1/2022
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NPRA financial narrative 20220214.pdf	2/14/2022
Chyulu REDD+ Project 201712 - 20191231 FAS.xls	2/18/2022
Chyulu REDD+ Project Jan. 2020 - Dec. 2020 FAS+ct.xls	2/18/2022
Chyulu REDD+ Project Jan. 2021 - Dec. 2021 FAS.xls	2/18/2022
Chyulu REDD+ Project KES Bank Statement December 2020.pdf	2/18/2022
Chyulu REDD+ Project US Bank Statement December 2020.pdf	2/18/2022
MWCT Chyulu REDD+ Project KES Bank Account...094 Statement as at 31. 03. 2021.pdf	2/18/2022
MWCT Chyulu REDD+ Project KES Bank Account...107 Statement as at 31. 03. 2021.pdf	2/18/2022
MWCT Chyulu REDD+ Project US Bank Account...073 Statement as at 31. 03. 2021.pdf	2/18/2022
REDD+ Project Bank Statement 20191231.pdf	2/18/2022
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BLL 2019 A.pdf	2/18/2022
BLL 2018 AUDITED FINANCIAL STMTS.pdf	2/18/2022
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BLL 2020 B.pdf	2/18/2022
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Chyulu REDD Due Dilligence 2020_06_24.docx	2/28/2022
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IMG_2072.JPG	2/28/2022
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CV_Beatriz_Zapata.pdf	2/28/2022
IMG_2077.JPG	2/28/2022
CV_Jhoanata_Bolivar Cardona.pdf	2/28/2022
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Chyulu REDD+ Project 201712 - 20191231 FAS.xls	2/28/2022
Financial analysis v2 verification 20220218.xlsx	2/28/2022
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Chyulu REDD+ Project Jan. 2021 - Dec. 2021 FAS.xls	2/28/2022
Chyulu REDD+ Project KES Bank Statement December 2020.pdf	2/28/2022
MWCT Chyulu REDD+ Project US Bank Account...073 Statement as at 31. 03. 2021.pdf	2/28/2022
MWCT Chyulu REDD+ Project KES Bank Account...107 Statement as at 31. 03. 2021.pdf	2/28/2022
REDD+ Project Bank Statement 20191231.pdf	2/28/2022
Chyulu REDD+ Project US Bank Statement December 2020.pdf	2/28/2022
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MWCT 2017 Audited Financial Statements.pdf	2/28/2022
BLL 2020 B.pdf	2/28/2022
BLL 2019 A.pdf	2/28/2022
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MWCT Chyulu REDD+ Project US\$ Bank Account...073 Statement as at 31. 03. 2021.pdf	2/28/2022
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2020_Proxy_plots_LandCover.xlsx	2/28/2022
21059.00_ChyluluHills_Round_2_Findings.xlsx	2/28/2022
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Grassland leakage_final.xlsx	3/30/2022
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Chyulu REDD+ Project Jan. 2021 - Mar. 2021 FAS+ct.xls	3/30/2022
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MWCT Chyulu REDD+ Project KES Bank Account...107 Statement as at 31. 03. 2021.pdf	3/30/2022
MWCT Chyulu REDD+ Project US Bank Account...073 Statement as at 31. 03. 2021.pdf	3/30/2022
NPRA financial narrative 20210429 FINAL.pdf	3/30/2022
REDD+ Project Bank Statement 20191231.pdf	3/30/2022
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Chyulu REDD Due Dilligence 20210430docx.docx	3/30/2022
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CV_Jhoanata_Bolivar Cardona.pdf	3/30/2022
CV_Sara_Betancur.pdf	3/30/2022
Financial analysis v2 verification 20220218.xlsx	3/30/2022
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Chyulu REDD+ Project US Bank Statement December 2020.pdf	3/30/2022
MWCT Chyulu REDD+ Project KES Bank Account...094 Statement as at 31. 03. 2021.pdf	3/30/2022
MWCT Chyulu REDD+ Project KES Bank Account...107 Statement as at 31. 03. 2021.pdf	3/30/2022
MWCT Chyulu REDD+ Project US Bank Account...073 Statement as at 31. 03. 2021.pdf	3/30/2022
REDD+ Project Bank Statement 20191231.pdf	3/30/2022
Chyulu REDD+ Project 201712 - 20191231 FAS.xls	3/30/2022
NPRA financial narrative 20220214.pdf	3/30/2022
Chyulu REDD+ Project Jan. 2020 - Dec. 2020 FAS+ct.xls	3/30/2022
Chyulu REDD+ Project Jan. 2021 - Dec. 2021 FAS.xls	3/30/2022
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Landcover_proxy.prj	3/30/2022
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Landcover_proxy.shp.xml	3/30/2022
Landcover_proxy.shx	3/30/2022
Stamped Deed of Trust.pdf	3/30/2022
BLL 2019 A.pdf	3/30/2022
BLL 2018 AUDITED FINANCIAL STMTS.pdf	3/30/2022
BLL 2019 B.pdf	3/30/2022
CHYULU DEVELOPMENT EXPENSES - 2018-2020.xlsx	3/30/2022
EXPENDIRE AND REVENUE FOR KIBWEZI 2018-19 AND 2019- 20 FY.xlsx	3/30/2022

TSAVO & CHYULU 2017 - 2020 ope stmts.xlsx	3/30/2022
BLL 2020 B.pdf	3/30/2022
MWCT 2018 - 2017 Full Financial Statements.xls	3/30/2022
BLL 2020 A.pdf	3/30/2022
MWCT 2019 - 2018 Full Financial Statements_Revised.xls	3/30/2022
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MWCT 2017 Audited Financial Statements.pdf	3/30/2022
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21059.00_ChyluluHills_Round_3_Findings.xlsx	4/22/2022
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Chylulu Hills_Grassland_NERs_V4.xlsm	4/22/2022
Chylulu Hills_Total_NERs_V4.xlsm.xlsx	4/22/2022
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Final Land Use management KGR_2019 signed.pdf	4/22/2022
VCS-Non-Permanence-Risk-Report_V5.docx	4/22/2022
VCS-Risk-Report-Calculation-Tool-v4.0_V5.xls	4/22/2022
Longevity Score Clarification Letter - Chylulu Hills (4.22.22).docx	4/22/2022
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APPENDIX B: VCS NCRS/CLS/OFI

Findings Number	1
VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Section)	3.1 General Requirements
VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Description)	3.1.3 Projects and the implementation of project activities shall not lead to the violation of any applicable law, regardless of whether or not the law is enforced.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD; MR
Aster Global Findings Round 1	Section 2.5.1 of the MR outlines all relevant laws for the project and states that the "CHRP meets all local, national and international laws, which relate to this Project." The audit team was unable to find evidence that demonstrates compliance.
NCR/CL/OFI Round 1	CL: Please clarify how compliance with relevant laws and regulations is documented or demonstrated for project activities.
Response from Project Proponent Round 1	Answer added in the section 2.5.1.
Aster Global Findings Round 2	Section 2.5.1 of the MR has been updated to demonstrate that the project proponent works closely with the national government to ensure that they are aware of laws and notified if they changed. This item is addressed.

Findings Number	2
VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Section)	3.2 AFOLU-Specific Matters
VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Description)	3.2.2 Where projects are located within a jurisdiction covered by a jurisdictional REDD+ program, project proponents shall follow the requirements in this document and the requirements related to nested projects set out in the VCS Program document <i>Jurisdictional and Nested REDD+ Requirements</i> .
Requirement Met (Y, N or Pending)	Y

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD; MR
Aster Global Findings Round 1	It is unclear to the audit team whether or not the project area falls within a jurisdiction covered by a Jurisdictional REDD+ program. The PD states: "Finally, the Chyulu Hills REDD+ Project aims to be included in a jurisdictional REDD+ scheme, which will allow for the sale of large credit volumes, on a recurring, sustainable basis, to sovereign nations." The audit team found no mention of if the project has been in a Jurisdictional REDD+ program.
NCR/CL/OFI Round 1	CL: Please provide clarity on finding 1 CL: Please update the MR to clarify the status of the project as it relates to the Jurisdictional REDD+ scheme
Response from Project Proponent Round 1	Answer included in the section 2.1.9
Aster Global Findings Round 2	Section 2.1.9 of the MR now explains that Kenya is in the process of developing a national nesting and jurisdictional framework, but at this time the CRRP is not under a jurisdiction covered by a Jurisdictional REDD+ Program. This item is addressed.

Findings Number	3
VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Section)	3.2 AFOLU-Specific Matters
VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Description)	3.2.15 Where an event occurs that is likely to qualify as a loss event (see the VCS Program document Program Definitions for definition of loss event), the project proponent shall notify Verra within 30 days of discovering the likely loss event. Where VCUs have been previously issued, a loss event report shall be prepared and submitted to the Verra registry, as follows:
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR Section 3.2.2.3
Aster Global Findings Round 1	The audit team reviewed the MR section 3.2.2.3 and noted there were emissions from fires within the most recent monitoring period. It is unclear to the audit team whether or not these fires qualified as a loss event.
NCR/CL/OFI Round 1	CL: Please clarify in line with the finding.

Response from Project Proponent Round 1	With more accurate information from the staff in the ground, Paul the botanist and Leon from CI , we confirmed that the most affected vegetation by fires correspond to: grasses, herbs, forbs and smaller shrubs. Using this information, emissions from fires were updated. The results show that this do not correspond to emissions bigger than 5% so, it is not a loss event. Please refer to document: Effects of fire Trees_REDD+ Biomass.docx and excel: ChyuluHills_FireMonitoringData_2017_2020_V2.xlsx SECTION 3.2.2.3 was updated
Aster Global Findings Round 2	The audit team reviewed the update MR, specifically section 3.2.2.3 and 3.2.2.3.1 and it is unclear why Table 9. Fire Emissions does not reflect the emissions as estimated in the ChyuluHills_FireMonitoringData_2017_2020_Historic_2001_2019.xlsx and applied in the NERs workbook. Additionally, using this
NCR/CL/OFI Round 2	CL: Please clarify the discrepancy noted by the VVB between the MR and calculation workbooks. CL: If necessary, please provide evidence the VCS loss event procedure has been followed.
Response from Project Proponent Round 2	The updated Fire emissions workbook correspond to: ChyuluHills_FireMonitoringData_2017_2020_V3.xlsx. In this document we compare previous and current analyses. Also in the document: "Effects of fire Trees_REDD+ Biomass.docx " and in the folder "pictures", we explained that the fires affect mainly small shrubs and because of that we are not including emissions from trees burning.
Aster Global Findings Round 3	The audit team reviewed the updated PDD and quantification workbook and the VVB is reasonably assured the fires in the project area do not qualify as a loss event. This finding is closed.

Findings Number	4
VCS Standard Version 4.1 Requirements Document 22 April 2021, v4.1 (Section)	3.10 Project Location
VCS Standard Version 4.1 Requirements Document 22 April 2021, v4.1 (Description)	3.10.3 The project proponent shall demonstrate control over the entire project area with documentary evidence establishing project ownership, noting the following:
Requirement Met (Y, N or Pending)	FAR

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Conflicts and Grievances Document
Aster Global Findings Round 1	The audit reviewed the "Conflicts and Grievances" document, and it is unclear to the audit team how the project proponents are in control of the disputed land referenced in the aforementioned document.
NCR/CL/OFI Round 1	CL: Please clarify how this criterion is satisfied, and provide verifiable evidence that this criterion is satisfied.
Response from Project Proponent Round 1	Document "ChyuluNP land dispute 20210525" in Findings\FirstRound\LandDispute Section 2.5.4 Updated For title deeds please refer to the folder: "Findings\FirstRound\Land Rights"
Aster Global Findings Round 2	The audit team reviewed the updated MR and additional documents. Considering the recent court ruling it is unclear to the audit team how the project is in control of the entire project area.
NCR/CL/OFI Round 2	NCR: Please clarify in line with the finding or apply VCS procedures to account for the area that is not in control of the project.
Response from Project Proponent Round 2	Aster is going to set anticipate a forward action request
Aster Global Findings Round 3	This has been ongoing issue in the project and has yet to be settled by the courts. The VVB intends to issue a FAR regarding this item.

Findings Number	5
VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Section)	3.16 Safeguards
VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Description)	3.16.14 The project proponent or any other entity involved in project design or implementation shall not be involved in any form of discrimination or sexual harassment.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Findings Round 1	Site visit observations supported the project's conformance with this requirement, However, the audit team did not see a statement in the MR on discrimination or sexual harassment for the current monitoring period.
NCR/CL/OFI Round 1	CL: Please update the MR to show that discrimination and sexual harassment has not occurred during the current monitoring period.

Response from Project Proponent Round 1	Information added in section 2.4.4
Aster Global Findings Round 2	Section 2.4.4 contains additional detail about the sexual harassment policy. The CHRP Employment and Project Participation Policies document was provided and outlines the policies related to hiring of employees and outlines what employees should do if they have a complaint. During the site visit there was no evidence that this requirement has not been met during the monitoring period.

Findings Number	6
VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Section)	3.16 Safeguards
VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Description)	3.16.17 1) The project design and implementation, including the results of monitoring.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR Section 2.3.3
Aster Global Findings Round 1	Figure 6 in the MR Section 2.3.3 shows the field information board, which contains project information documents posted for public viewing. A Monitoring Report Summary was prepared in English, Swahili, and Maa and was provided to communities throughout the project area. The audit team is requesting copies of the MR Summaries prepared in English, Swahili, and Maa.
NCR/CL/OFI Round 1	CL: Please provide copies of the MR summaries described in Section 2.3.3 of the Monitoring Report.
Response from Project Proponent Round 1	Summary in Swahili shared: Swahili – Findings\FirstRound\MR Summary
Aster Global Findings Round 2	Copies of the MR summary in Swahili were provided to the verification team. The MR has been updated and no longer states that summaries in Maa were made available. This item is addressed.

Findings Number	7
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VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Section)	3.16 Safeguards
VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Description)	3.16.18 The project proponent shall develop a grievance redress procedure to address disputes with local stakeholders that may arise during project planning and implementation, including with regard to benefit sharing. The procedure shall include processes for receiving, hearing, responding and attempting to resolve grievances within a reasonable time period, taking into account culturally-appropriate conflict resolution methods. The procedure and documentation of disputes resolved through the procedure shall be made publicly available. The procedure shall have three stages:
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD Section 2.7.3
Aster Global Findings Round 1	A feedback and grievance redress procedure is outline in Section 2.7.3 of the PD and has been previously validated. Based on observations made during the site visit and during CCB verification, the audit team is requesting a summary of the grievances raised during the monitoring period.
NCR/CL/OFI Round 1	CL: Please provide a summary of the grievances raised during the monitoring period and the status of each grievance.
Response from Project Proponent Round 1	Grievances folder: Findings\FirstRound\Grievances
Aster Global Findings Round 2	Summaries and additional documentation for 4 grievances received during the monitoring period were provided to the verification team. From the evidence provided, it appears as though the grievance and redress procedure outlined in the PDD was followed.

Findings Number	8
VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Section)	3.17 Methodology Deviations
VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Description)	3.17.1 Deviations from the applied methodology are permitted where they represent a deviation from the criteria and procedures relating to monitoring or measurement set out in the methodology (i.e., deviations are permitted where they relate to data and parameters available at validation, data and parameters monitored, or the monitoring plan).

Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR, Section 2.2.2
Aster Global Findings Round 1	Section 2.2.2 states "There are no deviations from the methodology. The deviation does not negatively impact the conservativeness of the quantification of GHG emission reductions or removals. The deviations relate only to the criteria and procedures for monitoring or measurement, and do not relate to any other part of the methodology." It appears there are no methodology deviations, but the 2 secondary paragraphs are confusing and should likely be omitted.
NCR/CL/OFI Round 1	CL: Please clarify why the second and third paragraphs of Section 2.2.2 remain in the MR if there are no deviations.
Response from Project Proponent Round 1	
Aster Global Findings Round 2	The audit team reviewed the updated in MR and notes that now the MR includes a methodology deviation related to the required monitoring of proxy area plots. Currently there is not a enough of a discussion of the methodology deviation for the audit team assess the methodology deviation as it relates to the VCS Standard criterion. Additionally, there is not discussion of how the methodology deviation impacts the conservativeness of the project.
NCR/CL/OFI Round 2	CL: Please add additional detail to the MR describing the methodology in context of how the deviation affects the quantification, specifically which parameters are affected, etc. CL: Please add additional detail to the MR describing how the methodology deviation impacts the conservativeness of the ER claimed.

Response from Project Proponent Round 2	All leakage plots, proxy area plots and project accounting area plots must be remeasured at least every five years, or after a significant event that changes stocks in the proxy or project accounting areas. However, the proxy area plots were not measured due to access constraints. Nevertheless, we did analyse the land cover of the plots with updated (2020) information. Please refer to folder Findings\FirstRound\Climate\Proxy. Please refer to section 3.2.1.6. This deviation does not affect the conservativeness of the estimations since we are using information of the land cover that correspond to the year of the plots measuring. In this sense we are confirming that the vegetation type of the proxy areas corresponds to the same than those identified in the previous validation and verification of the project. This deviation was applied just to the parameter proxy area carbon stock and do not affect any other section of the methodology followed.
Aster Global Findings Round 3	Thank you for adding the additional language to the PDD. The audit team reviewed the 2020_Proxy_plots_LandCover workbook which shows the landcover of the leakage plots in 2020. However, there is no analysis in this workbook. Based on the description of the deviation, the VVB expected to see a comparison of land cover classes for the inventory plots in the proxy area between the previous monitoring period and this monitoring period. It is unclear to the audit team what the current analysis demonstrates.
NCR/CL/OFI Round 3	CL: Please provide additional information in the PDD to clearly explain what the monitoring approach for the proxy area inventory plots is and how it is justifiable. Additionally, if needed please update the analysis and/or provide enough information so the VVB can recreate the analysis.
Response from Project Proponent Round 3	1. In the folder "Proxy" you can find In the folder with the GIS information as well as the list of land cover in 2020 for proxy plots. 2. In folder we included the excel we have available for the proxy plots in the first verification, furthermore in the excel "2020_Proxy_plots_LandCover.xlsx" excel we included the graphical information regarding the proxy area that was validated. In there all the plots are under agricultural land cover. Verified Baseline carbon stocks in biomass at the end of the current monitoring period for the Forest was equal to 5. and for Grassland was 0 (Please refer to section 5.3 of first Monitoring Report) 3.Explanation of this was included in section 3.2.1.6
Aster Global Findings Round 4	The audit team confirmed using Google Earth (some old imagery dating back to 2011/12/17/18 but mostly 2020/21) that proxy plots were croplands in line with observations in "2020_Proxy_plots_LandCover.xlsx". The audit team agrees that the information given is sufficient to conclude that the use of initially verified proxy area data is appropriate. This item is closed.
Findings Number	9

VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	New projects must use version 4 of the risk tool and risk reports
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report.docx
Aster Global Findings Round 1	The Non-Permanence Risk Report v4.0 is used, which is the correct version. The VCS Risk Report Calculation Tool was not provided to the audit team.
NCR/CL/OFI Round 1	CL: Please provide a copy of the VCS Risk Report Calculation Tool
Response from Project Proponent Round 1	Information located in:Findings\FirstRound\NPRT
Aster Global Findings Round 2	The VCS Risk Report Calculation Report was provided to the verification team. This item is addressed.

Findings Number	10
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 2 Financial Viability (FV)
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	d) Project cash flow breakeven point is less than 4 years from the current risk assessment
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report.docx
Aster Global Findings Round 1	Project development and operating expenses are provided in the cash flow analysis. However, the verification team was unable to substantiate these figures.

NCR/CL/OFI Round 1	CL: Please provide supporting documents for the project development and operating expenses,
Response from Project Proponent Round 1	The "operating expenses" (Partner core programmes, Carbon project funding, Endowment principal contribution) were obtained from the financial analysis of the first verification "Financial analysis v1 verification 20210429 FINAL (2)" located in \Findings\FirstRound\NPRT\Other, the standard rates were obtained from https://verra.org/wp-content/uploads/2020/04/CCB-Standards-Fee-Schedule-v3.4.pdf and https://verra.org/wp-content/uploads/2020/04/Program-Fee-Schedule-v4.1.pdf and the project development costs (PD, Monitoring, verification and validation) correspond to the values charged by South Pole, which can be found in the sheet "client inputs" of the file "280521_cash_flow_REDD+_Chyullu Hills USD" located in Findings\FirstRound\NPRT\internal_risk
Aster Global Findings Round 2	The audit team reviewed the NPRT, cashflow workbook, and Financial analysis v1 verification 20210429 FINAL. The audit team noted the follow: 1. The audit team was provided the Financial analysis v1 verification 20210429 FINAL workbook, and other supporting documents. However the NPRT Section 2.2.2 Point 2 states "The cash flow breakeven point is the year in which the cumulative cash flow is positive (i.e., cash flow in exceeds cash flow out) and stays positive." The audit team has been provided a cash flow analysis that starts in 2017 and we are unable to verify cumulative cash flow over the life of the project as the project has a start date of 19 September 2013. 2. The updated cash flow analysis should reflect the actual operating expenses, project income, etc. Furthermore these figures should be supported by verifiable evidence. Furthermore, the NPRT states "Projects may demonstrate that funding has been secured through, for example, financial statements, bank records, executed commodity purchase agreements, executed emission reduction purchase agreements or other signed contractual agreements." 3. Additionally, the audit team noted that the project NPRT states "According to the cash flow result , the break-even point of the project is reached in year 2 based on the current risk assessment." Currently the cash flow as shown by the graph shows a positive cash flow starting in 2017. It is unclear why there is discrepancy between the cash flow analysis and what is stated in the NPRT.
NCR/CL/OFI Round 2	CL: Please update the cash flow analysis to cover the entire project period and ensure that the updated analysis reflects what has actually occurred during the lifetime of the project and provide evidence to support these historical figures. CL: Please clarify in line with the discrepancy noted in Finding 3 and update the NPRT or cash flow analysis if needed..

Response from Project Proponent Round 2	Please refer to: SecondRound\NPRT\1_Internal_risks\1_Internal_risks Documents: Financial analysis v2 verification 20220218.xlsx and NPRA financial narrative 20220214.pdf NPR Report was updated
Aster Global Findings Round 3	1. The audit team reviewed the updated Financial analysis workbook and confirms that it covers the entire crediting period. This item is addressed. 2.The audit team reviewed the updated Financial analysis workbook and confirms the issue related to positive cash flow has been addressed. This item is addressed.

Findings Number	11
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 2 Financial Viability (FV)
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	g) Project has secured 40% to less than 80% of funding needed to cover the total cash out required before the project reaches breakeven
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report.docx
Aster Global Findings Round 1	The verification team reviewed the cash flow analysis but was unable to locate substantiation for the figure presented in the "Financing Cash Flows" category. Additionally, the price per credit was given, but the verification team did not locate documentation supporting it.
NCR/CL/OFI Round 1	CL: Please provide any available documentation to support the price per credit and the figures presented in the cash flow assumptions.

Response from Project Proponent Round 1	The credit price was obtained from the financial analysis of the first verification Financial analysis v1 verification 20210429 FINAL located in \Findings\FirstRound\NPRT\Other. For the period 2017 to 2020, the credit price corresponds to the sales report and thereafter used projections based on "<u>CI average sales projections and ecosystem marketplace</u>" and increased year on year according to inflation in the conservative scenario. According to the market study conducted by South Pole in 2020 based on its average sales, the price of the credit for an AFOLU project, VCS, in Kenya is around 9.83 USD, which is above the price used in the analysis for the year 2021.
Aster Global Findings Round 2	Thank you for clarifying the pricing information included in the NPRT. The audit team believes these prices are reasonable and in line with current market expectations. However, the VVB notes that no evidence has been provided to satisfy the requirements of the NPRT which state "Projects may demonstrate that funding has been secured through, for example, financial statements, bank records, executed commodity purchase agreements, executed emission reduction purchase agreements or other signed contractual agreements. Evidence shall be provided that agreement counterparties are in good financial standing, to demonstrate the ability to meet the financial obligations. Given execution uncertainties, options contracts shall not be counted as secured funding." The VVB currently understands that the financing occurs through 6 mechanisms which are stated in cells B38:B43, of the VCS (30) Years tab of the 280521_Cash_flow_REDD+_Chyulu Hills USD workbook. The audit team was unable to find evidence to support the revenues from Philanthropic Sources (both previous and future), Government (both previous and future), and Conservation & Other Fees (previous). The NPRT states "Based on available financial information, the project has obtained 55% of the financing required before break-even, according to the income reported by the trust partners ", however, the formula applied (a ratio of the NPV of Income to the NPV of Expenses) in the cash flow analysis workbook is different than the method specified in the NPRT. For clarify, the NPRT states "The percentage of needed funding secured shall be calculated by adding up all funding and revenue already secured and dividing this by the total cash out up to and including the year the project reaches breakeven."

NCR/CL/OFI Round 2	CL: Please provide evidence to support all figures used in the "Financing Cash Flows" category in line with the requirements of the NPRT. CL: Please ensure that the financing need prior to break-even is calculated in line with the requirements of the NPRT.
Response from Project Proponent Round 2	Please refer to: SecondRound\NPRT\1_Internal_risks\1_Internal_risks Documents: Financial analysis v2 verification 20220218.xlsx and NPRA financial narrative 20220214.pdf NPR Report was updated reducing the risk of financial viability according to the information shared in the internal meeting between ASTER and Chrstopher Tuite and the documents listed above
Aster Global Findings Round 3	The audit team reviewed the additional evidence provided by the project team. This finding is closed. For clarity, the initial risk score claimed by the project was in error and the updated risk score for this category corresponds to Risk Factor d in the VCS Risk Tool.

Findings Number	12
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 3 Opportunity Cost
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	d) NPV from the most profitable alternative land use activity is expected to be between 20% more than and up to 20% less than from project activities; or where baseline activities are subsistence-driven, net positive community impacts are demonstrated
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report.docx
Aster Global Findings Round 1	The verification team noted the discussion of livestock production as the most profitable alternative land use activity. It was unclear how the demonstration starting on Row 123 of the "VCS (30 years)" tab represents this assessment (of the most profitable alternative land use activity is expected to be between 20% more than and up to 20% less than from project activities). If the project is opting to claim "baseline activities are subsistence-driven" and thus taking a score of zero, then it is unclear how this was determined, as not all baseline activities were subsistence driven.
NCR/CL/OFI Round 1	CL: Please address the Finding.

Response from Project Proponent Round 1	Where most of the baseline activities during the project crediting period are livelihood driven, a Net Present Value (NPV) analysis is not required, but rather an assessment of the net impacts of the project on the social and economic well-being of the communities that derive their livelihoods (see section 2.2.3 of the Non-permanence Risk tool). Based on this assessment, the project will be assigned an opportunity cost score as set out in Table 3 of this tool (option d). "According to the household survey report, which sampled a total of 179 households in the West and 157 in the East of the project, almost all households used livestock production as a livelihood and for household consumption. Overall, in the East, 81.8% of cattle production and 79.7% of production was for household consumption." For this reason, option "d" was selected and the positive impacts of the project were justified, without requiring NPV analysis or comparison with the results of row 123.
Aster Global Findings Round 2	Site visit observations and interviews support the assertion and results from the household surveys that baseline activities are subsistence-driven and therefore an NPV analysis is not required. Benefits to the community are demonstrated through adherence to the CCB standard. This item is addressed.

Findings Number	13
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 3 Opportunity Cost
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	h) Mitigation: Project is protected by legally binding commitment (see Section 2.2.4) to continue management practices that protect the credited carbon stocks over the length of the project crediting period
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report.docx
Aster Global Findings Round 1	There are two national parks within the project area that are in the IUCN Protected Area Management Category. However, it is unclear how the entire project area is covered by a legally binding commitment to continue management practices that protect the credited carbon stocks over the length of the project crediting period.
NCR/CL/OFI Round 1	CL: Please address the Finding.

Response from Project Proponent Round 1	Response included in the document "Legal agreement or requirement to continue the management practice" in the folder Findings\FirstRound\NPRT Find the agreements in Findings\FirstRound\Land Rights\Management agreements, please note they are sensitive and confidential information.
Aster Global Findings Round 2	1. The project proponents response states "The agreement between Imbirikani and Big Life is currently being re-negotiated but is expected to be renewed under similar terms to the recently expired agreement (available for review)." Thus there is no legal protection for the Mbirikani piece of the project. The Kuku management agreement only extends to 2035 which does not fully encompass the entire crediting period. 2. Additionally, after a review of the contracts it appears that the owners of the Ranches can pull out of the agreement given written notice is provided it is unclear to the VVB if these contracts meet the requirements of the NPRT which states " Legal agreement or requirement to continue the management practice refers to any legally enforceable agreement or requirement, such as a conservation easement or protected area law that would require the continuation of the management practice that sequesters carbon or avoids emissions for the entire project longevity."
NCR/CL/OFI Round 2	CL: Please update the risk score or provide evidence to satisfy this requirement. CL: Please clarify in line with Finding 2.
Response from Project Proponent Round 2	In the management agreements for each group ranch and in the trust deed documents, the different partners agree to have conservation and deforestation reduction management in the project area. While these agreements have different expiration dates, the interest and responsibility for maintaining the project's objective is maintained. The project will work towards having legally binding commitments in future monitoring periods that will be more concrete regarding the length of the project crediting period. Please refer to document: stamped deed of trust in: NPRT\1_Internal_risks\1_Internal_risks
Aster Global Findings Round 3	The audit team reviewed the stamped deed of trust which is not a legally binding commitment to protect carbon stocks over the length of the crediting period. While the VVB understands that more concrete commitments will be put in place for this verification period the demonstration has not been provided, including evidence, to support the claim of this mitigation credit. If the project wishes, they may take this item to Verra. Note that the requirement states " legally binding commitment (see Section 0) to continue management practices that protect the credited carbon stocks over the length of the project crediting period."

NCR/CL/OFI Round 3	CL: Please update the risk score or provide evidence to satisfy this requirement.
Response from Project Proponent Round 3	Please refer to Longevity Score Clarification Letter - Chyulu Hills (4.22.22)
Aster Global Findings Round 4	The project proponent has received approval from Verra that the evidence provided to demonstrate "legally binding agreement to continue management practices" is sufficient to claim this mitigation. Item closed.

Findings Number	14
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 4 Project Longevity
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	b) With legal agreement or requirement to continue the management practice = 30 - (project longevity/2)
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report.docx
Aster Global Findings Round 1	There are two national parks within the project area that are in the IUCN Protected Area Management Category. However, it is unclear how the entire project area is covered by a legally binding commitment to continue management practices that protect the credited carbon stocks over the length of the project crediting period.
NCR/CL/OFI Round 1	CL: Please address the Finding.
Response from Project Proponent Round 1	Response included in the document "Legal agreement or requirement to continue the management practice" in the folder Findings\FirstRound\NPRT Find the agreements in Findings\FirstRound\Land Rights\Management agreements, please note they are sensitive and confidential information.
Aster Global Findings Round 2	The areas outside of the National Park have Management Agreements between the group ranches, Maasai Wilderness Conservation Trust, and Conservation Equity Limited. Agreement terms are either in perpetuity or for 15 years with the ability to renew. The audit team notes that the Project Longevity value reported in the updated NPRT is correct (15), however the value in the VCS-Risk-Report-Calculation-Tool-v4.0 for Project Longevity is not calculated correctly. Additionally the Overall Risk Rating in both documents is reported incorrectly.

NCR/CL/OFI Round 2	CL: Please update the NPRT tool and ensure the NPRT risk scores are correctly stated and the overall risk score is reported correctly. CL: Please ensure that all downstream calculations are updated as well.
Response from Project Proponent Round 2	In the management agreements for each group ranch and in the trust deed documents, the different partners agree to have conservation and deforestation reduction management in the project area. While these agreements have different expiration dates, the interest and responsibility for maintaining the project's objective is maintained. The project will work towards having legally binding commitments in future monitoring periods that will be more concrete regarding the length of the project crediting period. Please refer to document: stamped deed of trust in: NPRT\1_Internal_risks\1_Internal_risks
Aster Global Findings Round 3	The audit team reviewed the updated NPRT and confirmed that the value of 15 is applied correctly. Thank you for the clarification and additional evidence. However, the VCS NPRT Section 2.2.4 item 5) is explicit and states "Legal agreement or requirement to continue the management practice refers to any legally enforceable agreement or requirement, such as a conservation easement or protected area law that would require the continuation of the management practice that sequesters carbon or avoids emissions for the entire project longevity." In ARR and IFM projects with harvesting, where allowing re-growth of harvested areas is required by law, this may be demonstrated by citing the appropriate legal statute and common practice. Any project with a legally binding agreement that covers at least a 100-year period from the project start date shall be assigned a score of zero for project longevity. The VVB would be glad to discuss this item with the project team in a meeting. Additionally, as with all Findings issued by the VVB the project team has the right to take any issue to Verra.
NCR/CL/OFI Round 3	CL: Please provide evidence to support the statements in the NPRT or update the risk score as appropriate.
Response from Project Proponent Round 3	Please refer to Longevity Score Clarification Letter - Chyulu Hills (4.22.22)
Aster Global Findings Round 4	The project proponent has received approval from Verra that the evidence provided to demonstrate "legal agreements or requirements to continue the management practice" is sufficient to claim this risk score. Item closed.

Findings Number	15
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 6 Land Tenure

VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	c) In more than 5% of the project area, there exist disputes over land tenure or ownership
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report.docx
Aster Global Findings Round 1	The verification team noted the existence of disputes over land tenure or ownership. Though the project has claimed these disputes preceded the project by 20 years, the unresolved disputes still affect the project activities.
NCR/CL/OFI Round 1	CL: Please further substantiate why the risk rating was assigned a zero for this category, as on-going disputes exist in the project area.
Response from Project Proponent Round 1	The Chyulu Hills REDD+ Project has a grievance process which is set out in the "Grievance Policy" Located \Findings\FirstRound\Grievances. In the event that conflicts or grievances arise, the Project has a policy and process for feedback and grievance redress, which aims to provide an efficient, fair and accessible mechanism for resolving grievances and conflicts, and to ensure that the process is transparent and thorough. This grievance and conflict resolution procedure will also apply to any groups external to the Chyulu Hills Conservation Trust (CHCT) involved in the distribution of project benefits or the operation of project activities. Individual project partners currently have their own feedback and grievance redress procedures. These range from an open-door policy and open dialogue, to formalized procedures (see folder with grievance handling supports and grievance log template located in \Findings\FirstRound\Grievances).
Aster Global Findings Round 2	The audit team reviewed the updated NPRT, Project Proponent's response, and the previously verified MR. The current land dispute represents approximately 7,600 hectares and is ongoing. This is substantially less than 5% of the total project area which equates to 18,733 hectares. This item is addressed.

Findings Number	16
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 6 Land Tenure
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	f) Mitigation: Project area is protected by legally binding commitment (e.g., a conservation easement or protected area) to continue management practices that protect carbon stocks over the length of the project crediting period

Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report.docx
Aster Global Findings Round 1	There are two national parks within the project area that are in the IUCN Protected Area Management Category. However, it is unclear how the entire project area is covered by a legally binding commitment to continue management practices that protect the credited carbon stocks over the length of the project crediting period.
NCR/CL/OFI Round 1	CL: Please address the Finding.
Response from Project Proponent Round 1	Response included in the document "Legal agreement or requirement to continue the management practice" in the folder Findings\FirstRound\NPRT Find the agreements in Findings\FirstRound\Land Rights\Management agreements, please note they are sensitive and confidential information.
Aster Global Findings Round 2	1. The project proponents response states "The agreement between Imbirikani and Big Life is currently being re-negotiated but is expected to be renewed under similar terms to the recently expired agreement (available for review)." Thus there is no legal protection for the Mbirikani piece of the project. The Kuku management agreement only extends to 2035 which does not fully encompass the entire crediting period. 2. Additionally, after a review of the contracts it appears that the owners of the Ranches can pull out of the agreement given written notice is provided it is unclear to the VVB if these contracts meet the requirements of the NPRT which states " Legal agreement or requirement to continue the management practice refers to any legally enforceable agreement or requirement, such as a conservation easement or protected area law that would require the continuation of the management practice that sequesters carbon or avoids emissions for the entire project longevity."
NCR/CL/OFI Round 2	CL: Please update the risk score or provide evidence to satisfy this requirement. CL: Please clarify in line with Finding 2.

Response from Project Proponent Round 2	In the management agreements for each group ranch and in the trust deed documents, the different partners agree to have conservation and deforestation reduction management in the project area. While these agreements have different expiration dates, the interest and responsibility for maintaining the project's objective is maintained. The project will work towards having legally binding commitments in future monitoring periods that will be more concrete regarding the length of the project crediting period. Please refer to document: stamped deed of trust in: NPRT\1_Internal_risks\1_Internal_risks
Aster Global Findings Round 3	The audit team reviewed the updated NPRT and confirmed that the value of 15 is applied correctly. Thank you for the clarification and additional evidence. However, the VCS NPRT Section 2.2.4 item 5) is explicit and states "Legal agreement or requirement to continue the management practice refers to any legally enforceable agreement or requirement, such as a conservation easement or protected area law that would require the continuation of the management practice that sequesters carbon or avoids emissions for the entire project longevity." In ARR and IFM projects with harvesting, where allowing re-growth of harvested areas is required by law, this may be demonstrated by citing the appropriate legal statute and common practice. Any project with a legally binding agreement that covers at least a 100-year period from the project start date shall be assigned a score of zero for project longevity." The VVB was not provided evidence that satisfies these requirements. The VVB would be glad to discuss this item with the project team in a meeting. Additionally, as with all Findings issued by the VVB the project team has the right to take any issue to Verra.
NCR/CL/OFI Round 3	CL: Please provide evidence to support the statements in the NPRT or update the risk score as appropriate.
Response from Project Proponent Round 3	Please refer to Longevity Score Clarification Letter - Chyulu Hills (4.22.22)
Aster Global Findings Round 4	The project proponent has received approval from Verra that the evidence provided to demonstrate "legally binding agreement to continue management practices" is sufficient to claim this mitigation. Item closed.

Findings Number	17
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 10 Natural Risks

VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	b) Pest and Disease Outbreaks (PD)
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report.docx
Aster Global Findings Round 1	The FAO source provided did not appear to be updated since 2005. It is unclear if more updated data sources for pest and disease outbreaks exist.
NCR/CL/OFI Round 1	CL: Please provide more updated documentation on pest and disease outbreaks in Kenya, if available.
Response from Project Proponent Round 1	NPRT updated section "Pest and Disease outbreaks"
Aster Global Findings Round 2	Thank you for providing updated documentation on the risk of pest and disease outbreak for the project area. Based on the evidence provided this risk score is appropriate. This item is closed.

Findings Number	18
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	5 Project Boundaries
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	The physical and temporal constraints of the project as well as the greenhouse gases and carbon pools must be clearly delineated and defined by the project proponent. Bounds must conform to the latest guidance from the VCS and this methodology, and must be clearly and objectively defined to facilitate monitoring and evaluation.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR 210710_ChyluluHills_MR_VCS_CCB_final, MR MONIT_REP_1408_19SEP2013_31DEC2016
Aster Global Findings Round 1	The verification team was unable to locate the required description of project boundaries in the MR, similar to what was included in previous MRs.
NCR/CL/OFI Round 1	CL: Please include a description of the required project boundaries in the MR.

Response from Project Proponent Round 1	Included in Section 3.1.3 Monitoring Plan, Sampling Area.
Aster Global Findings Round 2	The audit team reviewed the updated MR and confirms that the project boundary as required is described within Section 3.1.3 of the MR. However, Table 6 and Table 7 of the MR do not match the validated PDD, it is unclear why this occurs.
NCR/CL/OFI Round 2	CL: Please ensure the project boundary as described in the MR is the same as the validated project boundary and implemented accordingly.
Response from Project Proponent Round 2	The same carbon pools of the PDD are included in this monitoring report. We included tha Soil is a major pool included and although soils were not measured in this monitoring period, soil data from the previous monitoring period was included assuming a conservative approach that the carbon stock remained constant.
Aster Global Findings Round 3	The audit team reviewed the updated MR and confirmed that Table 6 and 7 match the tables in the validated PDD. This item is closed.

Findings Number	19
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	5.2 Defining the Temporal Boundaries
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	The following temporal boundaries shall be defined: · The start date of the project. · The start date of the project crediting period. · The length if the project crediting period. · The dates and periodicity of baseline revision and monitoring periods. Baseline reevaluation after the project start date and monitoring must conform to the current VCS standard.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR, 2.1.5 and 2.1.6 PDD, 1.7/PDR.8 and PDR.9

Aster Global Findings Round 1	The project start date is 19 September 2013. The crediting period start date is 19 September 2013 and goes for 30 years through 2043. The dates and periodicity of baseline revision and monitoring periods do not appear to be located in the MR. However, the PD Section 1.7, PDR.8 states "Per the VCS guidelines, a mandatory baseline re-evaluation is to be executed at a minimum of every 10 years after the project start. Therefore, there will be a mandatory baseline re-evaluation on or before 19 September, 2033." Table 7 of PDR.9 of the PD contains a table of project milestones and future monitoring events, but it appears to be outdated.
NCR/CL/OFI Round 1	CL: In the current MR, please include the dates and periodicity of baseline revision and updated monitoring periods.
Response from Project Proponent Round 1	Information included in section 2.2 of Monitoring Report
Aster Global Findings Round 2	The audit team reviewed the updated MR and confirmed that the implementation schedule table has been updated. This item is closed.

Findings Number	20
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	6 Baseline Scenario
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	6.1 The participatory rural appraisal is an optional tool that suffices to identify the agents and drivers of deforestation in the event that the agents and drivers are not obvious. If, during validation, the agents and drivers of deforestation are found not to be evident, a participatory rural appraisal must be conducted. If a participatory rural appraisal is not used, then statistics about the agents and drivers obtained from published or unpublished sources should be used to demonstrate their prevalence.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR, Page 92 PDD, Page 215
Aster Global Findings Round 1	A PRA would have been conducted and approved at validation, as the requirement states. However, this item is a required parameter to be monitored during each monitoring period, per Page 215 of the PDD and 92 of the MR. It is not clear if/how this element was monitored during the current monitoring period.
NCR/CL/OFI Round 1	CL: Please clarify if/how the PRA monitoring occurred during the current monitoring period.

Response from Project Proponent Round 1	As the Methodology VM009 states: The participatory rural appraisal is a voluntary survey of the populace surrounding the project area and may be used to identify the agents and drivers of conversion, delineate the reference area and identify strategies to mitigate ecosystem conversion in the project area. The project did not performed a PRA, but it based the agents and drivers of deforestation analysis on the expert knowledge: Section 2.7 of PDD: "A FPIC workshop took place on the 25th of September 2013 at Wildlife Works in Maungu, in the Kasigau Corridor REDD+ Project. A total number of 16 FPIC Officers from the Chyulu Hills area attended. During this workshop, discussion focused on the agents and drivers of deforestation and native grassland conversion, as well as on the community and community groups. Through the expert knowledge provided by the FPIC officers in these discussions all of the stakeholders of the Chyulu Hills REDD+ Project and a comprehensive list of the categories of people expected to be affected by the project were identified. This provided valuable background information for subsequent investigations and research Tables in 3.1.1 and 3.1.2 of the Monitoring Report were updated
Aster Global Findings Round 2	1. Thank you for the clarification. The parameter X[m] is a monitored parameter which is required to be monitored every monitoring per the PD page 215 and required to be monitored ≤ 5 yrs, per the methodology. It is unclear to the audit team how this parameter was monitored. 2. Additionally, for the X[m] parameter the MR states "Parameter not used"; however, it is used in the calculation of baseline emissions in section 5.3.1 of the PD. 3. The MR states "The BEM is parameterized using observations of historic imagery from the reference area." However, this seems to be in contrast to the statements made in the projects Round 1 Findings response.
NCR/CL/OFI Round 2	CL: Please update the MR to ensure that all parameters that are required to be monitored are appropriately described and in-line with statements made in the validated PDD. CL: Please provide verifiable evidence that all parameters that are required to be monitored have been monitored in line with the methodology. CL: Please clarify in line with finding 3 and update the MR if necessary.

Response from Project Proponent Round 2	This parameter is an optional covariable that it is used in modeling in the cases where deforestation has a big pressure from the population. The PDD states that the parameter was not used, In the NER sheet for validation, the value is set at 0. it is explained in the parameters $x - x_0 - x_A$. The general equation of BEM includes these parameters as optional. Therefore since the validation of the project accepted this value set as zero. Until next revalidation of baseline -if necessary- those parameters will be taking into account.
Aster Global Findings Round 3	Thank you for the clarification. As stated on page 94 of the VM0009 "The cumulative baseline emissions from biomass (parameter) as of monitoring period $[m]$ are calculated by equations [F.19], [F.20], [F.21], and [F.22] discussed in sections 8.1.1.1, 8.1.1.2, 8.1.1.3 and 8.1.1.4. Once verified, these quantities do not change when calculating baseline emissions for subsequent monitoring periods." The $X[m]$ values have remained the same. This finding is closed.

Findings Number	21
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	8.1 Baseline Emissions
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	8.1 The monitoring report must include the following: MR.10 Calculations of current baseline emissions (F.15) as of the current monitoring period.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR, Page 77
Aster Global Findings Round 1	The MR contains the F.15 value on Page 77 for a parameter. The value is reported to be 7,425,227 tCO ₂ e. It is unclear if the value presented represents the current or previous monitoring period value.
NCR/CL/OFI Round 1	CL: Please clarify if the F.15 value presented in the MR depicts baseline emissions as of the current monitoring period or baseline emissions from prior periods.
Response from Project Proponent Round 1	Labels included in section 3.2
Aster Global Findings Round 2	The audit team reviewed the updated MR and confirmed that MR.10 is reported correctly based on the current quantification documents. This item is closed.

Findings Number	22
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	8.1 Baseline Emissions
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	MR.11 Calculations of baseline emissions (F.15) from prior monitoring periods.
Requirement Met (Y, N or Pending)	N
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR, Page 77
Aster Global Findings Round 1	The MR contains the F.15 value on Page 77 for a parameter. The value is reported to be 7,425,227 tCO ₂ e. It is unclear if the value presented represents the current or previous monitoring period value. It is unclear where the differentiation between this item (MR.11) and the required element listed directly above (MR.10) occurs in the MR.
NCR/CL/OFI Round 1	CL: Please clarify where MR.10 is located in the MR or supporting documents. Please clarify why the required labels (MR.10, etc.) appear to not be in use.
Response from Project Proponent Round 1	Labels included in section 3.2
Aster Global Findings Round 2	1. The audit team reviewed the updated MR and was unable to locate MR.11 in the referenced workbook. Please clarify which cell/group of cells represent this value. 2. Additionally, the VVB understands that the MR should be written in a way that allows the reader to follow what has occurred during the monitoring period, including calculations. Currently, the MR references calculation worksheets in the Baseline and Project Emissions which is a reasonable approach. However, these quantification workbooks are not included as annexes to the MR.
NCR/CL/OFI Round 2	CL: Please clarify in line with the Finding 1. CL: Please include sufficient information in the MR to allow the reader to clearly follow the baseline and project emission calculations.

Response from Project Proponent Round 2	Please refer to NER Model/Chyulu Hills_Total_NERs.xlsm. In this new document you can find the total values for each model/parameter used in the estimations. For M.10 Please refer to cell P119:R119. For MR.11 Please refer to F.119 Section 3.2.1 was updated with more detailed information regarding the equations used and results obtained
Aster Global Findings Round 3	Thank you for the clarification. The VVB reviewed the updated MR and noted that the MR.11 values don't appear to match what is in the Chyulu Hills_Total_NERs workbook.
NCR/CL/OFI Round 3	CL: Please clarify in line with the finding and update the reporting documents if necessary.
Response from Project Proponent Round 3	Value changed in the MR
Aster Global Findings Round 4	The audit team noted that "Total E_BΔ [^] ([m-1])" was not correctly updated from "Cell F119, NER Model, Chyulu Hills_Total_NERs.xlsm.xlsx". Please update to the correct value,.
NCR/CL/OFI Round 4	CL: Please address in line with findings.

Findings Number	23
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	8.1 Baseline Emissions
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	MR.12 Calculations of cumulative baseline emissions for each selected pool and undecayed carbon, as of the current monitoring period.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Findings Round 1	It is unclear where this calculation is located.
NCR/CL/OFI Round 1	CL: Please clarify where MR.12 is located in the MR or supporting documents. Please clarify why the required labels (MR.12, etc.) appear to not be in use.
Response from Project Proponent Round 1	Labels included in section 3.2

Aster Global Findings Round 2	The audit team reviewed the updated MR and was able to verify the cumulative baseline emissions for each selected pool in the quantification workbook. Additionally, the MR states CB[m]DW is found in the workbook reference in the MR; however, it appears DW as a pool is not included in the project boundary.
NCR/CL/OFI Round 2	CL: Please clarify in line with the findings and update the text within the MR if needed.
Response from Project Proponent Round 2	Please refer to NER Model/Chyulu Hills_Total_NERs.xlsm. In this new document you can find the total values for each model/parameter used in the estimations. For M.12 refer to cells G118:R118. Document updated as: Calculation of cumulative baseline emissions for each selected pool and undecayed carbon as of the current monitoring period. The project does not include wood products or deadwood; therefore, the variables of equation [F.16] were not calculated. Details of the calculation are in section 3.2.1.1 which was updated with equations and results obtained
Aster Global Findings Round 3	The audit team reviewed the updated MR. This finding is closed.

Findings Number	24
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	8.1.1 Calculating Baseline Emissions from Biomass
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	The cumulative baseline emissions from biomass as of monitoring period [mm] are calculated by equations [F.19], [F.20], [F.21], and [F.22] discussed in sections 8.1.1.1, 8.1.1.2, 8.1.1.3 and 8.1.1.4. Once verified, these quantities do not change when calculating baseline emissions for subsequent monitoring periods.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR, Section 3.2.1.1
Aster Global Findings Round 1	Section 3.2.1.1 of the MR describes F.22, but the other equations are not mentioned.
NCR/CL/OFI Round 1	CL: Please describe where the Equations F.19-F.21 occur in the project calculations, so the verifier may confirm they have not changed in this subsequent monitoring period.
Response from Project Proponent Round 1	Labels included in section 3.2

Aster Global Findings Round 2	The audit team reviewed the updated MR and noted that the parameter determined by equation F.22 is not included in Section 3.1.2 of the MR.
NCR/CL/OFI Round 2	CL: Please update the MR to ensure that Sections 3.1.1 and 3.1.2 contain all the required parameters and all data within the tables is accurate and up-to date. .
Response from Project Proponent Round 2	According to the baseline tipe F-U1 and G-U1, cumulative baseline emissions from biomass, uses equation F.22. The value for this equation did not change in the previous monitoring period. Please refer to NER Model/Chyulu Hills_Total_NERs.xlsm. In this new document you can find the total values for each model/parameter used in the estimations. For F.22 please refer to cell F7 that is the sum of BEM from the 2 baselines. This parameter $E_{(B\text{ BM})}^{(m)}$ was included in section 3.2.1.1 and details about calculation were included in section 3.2.1.1 In the excel file NER Model/Chyulu Hills_Total_NERs.xlsm. you can find MR.13 in cells P7:R7. Parameter 3.1.1 and 3.1.1 were cheked and updated when necessary
Aster Global Findings Round 3	Thank you for the clarification. The audit team reviewed the updated MR and confirmed that the additional information has been provided and is accurately reported.

Findings Number	25
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	8.1.1 Calculating Baseline Emissions from Biomass
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	MR.13 Calculations of cumulative baseline emissions from biomass for the current monitoring period.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Findings Round 1	It is unclear where these required elements are included in the monitoring report.
NCR/CL/OFI Round 1	CL: Please clarify where MR.13 is located in the MR.

Response from Project Proponent Round 1	Labels included in section 3.2
Aster Global Findings Round 2	The audit team reviewed the updated MR and noted that the parameter determined by equation F.22 is not included in Section 3.1.2 of the MR.
NCR/CL/OFI Round 2	CL: Please update the MR to ensure that Sections 3.1.1 and 3.1.2 contain all the required parameters.
Response from Project Proponent Round 2	This parameter $E_{(B\ BM)}^{[m]}$ was included in section 3.1.2 and details about calculation were included in section 3.2.1.1 In the excel file NER Model/Chyulu Hills_Total_NERs.xlsm. you can find MR.13 in cells P7:R7.
Aster Global Findings Round 3	Thank you for the clarification. The audit team reviewed the updated MR and confirmed that the additional information has been provided and is accurately reported.

Findings Number	26
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	8.1.1 Calculating Baseline Emissions from Biomass
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	MR.14 Calculations of cumulative baseline emissions from biomass for all prior monitoring periods.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Findings Round 1	It is unclear where these required elements are included in the monitoring report.
NCR/CL/OFI Round 1	CL: Please clarify where MR.14 is located in the MR.
Response from Project Proponent Round 1	Labels included in section 3.2
Aster Global Findings Round 2	The audit team reviewed the updated MR and was unable to determine where cumulative baseline emissions from biomass for all prior monitoring periods is presented in the referenced workbook. The audit team reviewed the previous monitoring report and this value is reported as 7,184,272.
NCR/CL/OFI Round 2	CL: Please clearly state where this value is found in the workbook referenced in the MR. Additionally, please clarify if this value has changed.

Response from Project Proponent Round 2	According to the baseline type F-U1 and G-U1, cumulative baseline emissions from biomass, uses equation F.22. The value for this equation did not change in the previous monitoring period. Please refer to NER Model/Chyulu Hills_Total_NERs.xlsm. In this new document you can find the total values for each model/parameter used in the estimations. For F.22 please refer to cell F7 that is the sum of BEM from the 2 baselines. This parameter $E_{(B\ BM)^{[m]}}$ was included in section 3.2.1.1 and details about calculation were included in section 3.2.1.1. In the excel file NER Model/Chyulu Hills_Total_NERs.xlsm. you can find MR.13 in cells P7:R7. For a more clear explanation and to cover some finding below, the excel Chyulu Hills_Total_NERs.xlsm was created. In the sheet NER Model, you can find value for biomass emission model (7,187,273) in cell F7
Aster Global Findings Round 3	Thank you for the clarification. The audit team reviewed the updated MR and confirmed that the additional information has been provided and is accurately reported.

Findings Number	27
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	8.2 Project Emissions
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Calculation Excel spreadsheets

Aster Global Findings Round 1	The followings are general calculation questions regarding the Excel spreadsheets. 1. In "Tree_Carbon, 210616_Biomass_2020.xlsx", "Plot_Radius_in_m (Column AY)" of "plot_name (Column AW): MB023/MB025/T007" are 17.84 whereas in "Plots_list, 210616_Biomass_2020.xlsx", "Plot Radius" of these plots are 10. Please update to the correct values. 2. In "Tree_Carbon, 210616_Biomass_2020.xlsx", please check the calculation of "Carbon (tCO₂e/ha) (Column BJ)" for "X: 1115/1922/3683/3935/3940/3941/7542/7876/9064/9666 (Column A)" as they produce different estimates from the audit team's calculation. 3. In "Shrub_Carbon, 210616_Biomass_2020.xlsx", "plot_radius_in_m (Column N)" of "plot_name (Column L): MB023/MB024/MB025/KU052/T007" are 17.84 whereas in "Plots_list, 210616_Biomass_2020.xlsx", "Plot Radius" of these plots are 10. Please update to the correct values. 4. In "Shrub_Carbon, 210616_Biomass_2020.xlsx", where does the calculation for "TotalBiomass (kg/shrub) (Column P)" come from? Please clarify. 5. In "Plots_Carbon_summary, 210616_Biomass_2020.xlsx", how were Cells J4:J9/K4:K9/J14/K14/I21/I22 calculated. Please clarify. 6. In "Tree_Carbon, 210616_Biomass_2020.xlsx", "Single_trunk_DBH_at_1_4m_in_cm (Column J)" contains some high values (i.e. X (Column A): 1922/3683/9064/9664/9666), but it seems like these tree are multi-stem trees. Were these trees just measured as a single stem tree because of multiple stems? Please clarify. 7. In "Tree_Carbon, 210616_Biomass_2020.xlsx", why was "dbh (Column AJ)" divided by PI()? For example, let's assume d1/d2/d3 are multi-trunk diameters and D is the DBH, then $\{PI()*(d1/2)^2 + PI()*(d2/2)^2 + PI()*(d2/2)^2\} = PI()*(D/2)^2$. Please clarify. 8. Which specific year was "Tree_Carbon, 210616_Biomass_2020.xlsx" collected? Why were the same M27:34 in "BurntArea Monitor 2017-2020, ChyuluHills_FireMonitoringData_2017_2020_Historic_2001_2019.xlsx" used for quantification of G50:70 throughout 2017-2020? Additionally, why were "Carbon_trees (tCO₂/ha) (Cells L27:34)" not used in the fire quantification? Is it because trees were not burned? Please clarify.
NCR/CL/OFI Round 1	CL: Please address in line with findings.

Response from Project Proponent Round 1	1. Plot's size corrected, the information source "Plots_info" was updated. 2. These calculations were updated using the information provided in the document "Annex 7 - Allometry for PD v02". The main change is that trees bigger than 156cm of DBH have a specific allometric equation. The most recent information is in the excel "211126_Biomass_2020" located in \Findings\FirstRound\Climate. The updated sheets are "Tree carbon" and "Tree Carbon Summary". 3. Plot's size corrected, the information source "Plots_info" was updated. 4. This information comes from the sheet parameters K6:M6. This corresponds to the biomass of each shrub size according, this is the same information used in the first verification. 5. The cells come from the average for each strata, in Tree_Carbon_summary you can see the updated information with the linked data. 6. These are fig trees, which could have individual stems, these species are also some of the biggest in the Chyulu forests. 7. The data recolected in the field was circumference and this is the information included in the data base dbh (this header was changed) (AJ). Because of this reason, we are dividing by pi(). The equation used was: 8. The information was collected between October 2020 and March 2021. As we are using carbon stock of plots that were both burned and not burned we are using a high variable data that could explain the shrubs biomass in different sucession status. After GIS analysis and field visits to find out the affectation of trees after fires. we conclude that the affected vegetation are shrubs. Tree barks are burned but no tree were dead. Please refer to Folder Fires and section 3.2.2.3 for details.
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Aster Global Findings Round 2	1. The audit team confirmed the update of "Plot_Radius_in_m" for Plots "MB023/MB025/T007" to "10" in "Tree_Carbon, 211126_Biomass_2020.xlsx". This item is closed. 2. The audit team confirmed the update of "biomass_kg" calculations, in line with "Allometry for PD v02.pdf" and "Tree_Carbon_subset, 211126_Biomass_2020.xlsx". This item is closed. 3. The audit team confirmed that "Plot_Radius_in_m (Column R)" in "Plots_info, 211126_Biomass_2020.xlsx" was updated to the correct values and applied correctly into "plot radius_m (Column N)" in "Shrub_Carbon, 211126_Biomass_2020.xlsx". This item is closed. 4. The audit team agrees with the response from the project proponent and confirmed that the same data has been consistently applied from "210616_Biomass_2020.xlsx" to "211126_Biomass_2020.xlsx". This item is closed. 5. The audit team confirmed the updated calculation of "Plots_Carbon_summary, 211126_Biomass_2020.xlsx". This item is closed. 6. This item is confirmed via the meeting on DEC 17, 2021: Recording "VCS CAR's - Chyulu Hills (2021-12-17 at 06_24 GMT-8).mp4". This item is closed. 7. This item is confirmed via the meeting on DEC 17, 2021: Recording "VCS CAR's - Chyulu Hills (2021-12-17 at 06_24 GMT-8).mp4". This item is closed. 8. This item is confirmed via the meeting on DEC 17, 2021: Recording "VCS CAR's - Chyulu Hills (2021-12-17 at 06_24 GMT-8).mp4". This item is closed.
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Findings Number	28
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	8.3 Leakage
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	Total emissions from leakage for the current monitoring period are calculated by [F.44]. The cumulative emissions from leakage for the current monitoring period are given by [F.45], the sum of cumulative emissions from activity-shifting leakage in forest strata, the activity-shifting leakage in grassland strata and market leakage for the current monitoring period. Once estimated for the current monitoring period, these cumulative emissions from leakage are fixed for subsequent monitoring periods.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm

Aster Global Findings Round 1	Please provide additional materials or explanation on how 0.08 for [F.44], [F.45] in "NER Model, Chyulu Hills_Forest_NERs.xlsm/Chyulu Hills_Grassland_NERs.xlsm" is determined. The verification team was unable to locate "Annex-Climate-Leakage-Forest leak final" from Section 3.2.3 of the MR. Additional materials to trace the leakage calculation are needed. For Cells F:I120/F:I119 in "NER Model, Chyulu Hills_Forest_NERs.xlsm/Chyulu Hills_Grassland_NERs.xlsm", is Cp (Cells F:I119/Cells F:I118) accounted in the leakage calculation? Additionally, how is "Forest leak final May 2021.xlsx/Grassland leak final may 2021.xlsx" applied to leakage estimation?
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	There was a mistake in the leakage calculation, it was assumed as zero, considering this as a first verification which is not true. The new calculation was made using F.48 in Chyulu Hills_Forest_NERs_V2/NER Model in this we are using the parameter "Portion of leakage due to degradation in forest at the end of the current monitoring period" that is calculated in Forest leakage_final.xlsx For the Grassland scenario, please refer to Grassland leakage_final.xlsx where the parameter "Portion of leakage due to degradation in grassland at the end of the current monitoring period" is included. This value is zero. The archive "Chyulu Hills_Grassland_NERs_V2.xlsm/NER Model" was updated see row number 121
Aster Global Findings Round 2	The audit team confirmed the correct application of F.48 for LEMF. However, in "NER Model, Chyulu Hills_Forest_NERs_V2.xlsm", it is unclear if Cells F:I122 refer to the correct columns in "Parameters, Chyulu Hills_Forest_NERs_V2.xlsm." For example, Cell I122 refers to Column N in "Parameters" tab but the year of Column N in "Parameters" tab is 2022 whereas CellI122 refers to the year 2020 in "NER Model" tab. Please clarify.
NCR/CL/OFI Round 2	CL: Please address in line with findings.
Response from Project Proponent Round 2	Thanks for the correction, indeed the cells were displaced. Calculation was adjusted
Aster Global Findings Round 3	The audit team confirmed the update of referencing correct parameters for Cells F:I122. This item is closed.

Findings Number	29
Approved Methodology VM0009, Sectoral Scope 14 Version 06 June 2014 (Section)	8.4.1 Quantifying Gross Emissions Reductions

Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	VCS MR.66 Quantified GERs for the prior monitoring period.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / ChyuluHills_FireMonitoringData_2017_2020_Historic_2001_2019.xlsx / 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	As required by the methodology, please include the quantified GERs into "210710_ChyluluHills_MR_VCS_CCB_final.docx".
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	Please refer to section 3.2.4
Aster Global Findings Round 2	As per the methodology requirements "MR.65 Quantified GERs for the current monitoring period including references to calculations" and "MR.66 Quantified GERs for the prior monitoring period.", quantified GERs for both prior and current monitoring period should be included in the MR. So, Table 11. in "3.2.4.1 Quantifying Gross Emissions Reductions, 211229_ChyluluHills_MR_VCS_CCB_Findings_LHE_CHT_SBE_FINAL.docx" should include both prior and current monitoring periods.
NCR/CL/OFI Round 2	CL: Please address in line with findings.
Response from Project Proponent Round 2	Section 3.2.4 Updated accordingly
Aster Global Findings Round 3	The audit team confirmed the update of MR.65&66 in "3.2.4.1 Quantifying Gross Emissions Reductions, 220229_ChyluluHills_MR_VCS_CCB_Findings_2.docx". This item is closed.

Findings Number	30
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	VCS 8.4.1 Quantifying Gross Emissions Reductions
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	VCS MR.67 A graph of GERs by monitoring period for all monitoring periods to date.

Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / ChyuluHills_FireMonitoringData_2017_2020_Historic_2001_2019.xlsx / 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	As required by the methodology, please include the graphs in "Graphical Output, Chyulu Hills_Forest_NERs.xlsm/Chyulu Hills_Grassland_NERs.xlsm" into "210710_ChyluluHills_MR_VCS_CCB_final.docx".
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	Please refer to section 3.2.4
Aster Global Findings Round 2	As per "MR.67 A graph of GERs by monitoring period for all monitoring periods to date.", Figure 15. in "3.2.4.1 Quantifying Gross Emissions Reductions, 211229_ChyluluHills_MR_VCS_CCB_Findings_LHE_CHT_SBE_FINAL.docx" should include both prior and current monitoring periods. Also, please update Figure 15. as the values in Y axis don't match the values in Table 11 (e.g. Linear GERs are less than 1,000,000, only considering values from forest).
NCR/CL/OFI Round 2	CL: Please address in line with findings.
Response from Project Proponent Round 2	MR. 67 Updated
Aster Global Findings Round 3	The audit team confirmed the update of MR.67 in "3.2.4.1 Quantifying Gross Emissions Reductions, 220229_ChyluluHills_MR_VCS_CCB_Findings_2.docx". This item is closed.

Findings Number	31
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	8.4.1.1 Determining Deductions for Uncertainty
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	The confidence deduction is determined by [F.57], which is a linear combination of weighted standard errors of estimates from baseline emissions models and carbon stock measurements. The confidence deduction is not based on propagation of error. If the confidence deduction is negative, then it should be set to zero.
Requirement Met (Y, N or Pending)	Y

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	1. In "Parameters, Chyulu Hills_Forest_NERs.xlsm", please clarify units for Cells H75 & H65. Are Cells H75 & H65 tCO₂e, or tCO₂e/ha? Depending on the magnitude of values, they seem to be tCO₂e/ha. If Cells H75 & H65 are tCO₂e/ha, "E118*Parameters!\$H\$118" in "Cell E127, NER Model, Chyulu Hills_Forest_NERs.xlsm" will be "tCO₂e * tCO₂e/ha". Regardless, the unit will not match with "Parameters!H\$119*Parameters!H\$19" and "Parameters!H\$20*Parameters!H\$117" in the coding. It seems like EB[m]Δ is double-counted. 2. Additionally, in "Cells E:I127, NER Model, Chyulu Hills_Forest_NERs.xlsm", is "Parameters!\$H\$118" the standard error of "Cells E:F118, NER Model, Chyulu Hills_Forest_NERs.xlsm"? Then, please clarify why "E:I118*Parameters!\$H\$118" is applied in Cells "E:I127, NER Model, Chyulu Hills_Forest_NERs.xlsm". This question is actually related to Finding (1). 3. Do the same uncertainties (so, UEM, UP, UB in F.57, in other words, standard errors) apply for each monitoring period before the baseline renewal? 4. Finally, the same question relates to "Hills_Grassland_NERs.xlsm".
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	1. In deed it was a mistake on the estimation of "Total uncertainty in Baseline Emissions Models". 2. The parameter was recalculated in NERModel, [F.14]. 3. During this period, we apply the standard error for the biomass sampling (trees and shrubs) performed in 2020-2021 and we apply the same standard error for soil sampling performed in the previous monitoring period. Please check standard errors in 211126_Biomass_2020, Plots_Carbon summary. For proxy areas, we use same values as it was not sampled this monitoring period. These values were applied in UP, UB, Parameters, Chyulu Hills_Forest_NERs_V2.xlsm located in \Findings\FirstRound\Climate 4. Same changes for GrassLand, changes made in Chyulu Hills_Grassland_NERs_V2.xlsm" and 211126_Biomass_2020, Plots_Carbon summary (grassland section) located in \Findings\FirstRound\Climate
Aster Global Findings Round 2	The audit team confirmed the update of uncertainty calculations. However, it is unclear if the correct coding is applied for U_EM^[m], so Cells F:I128, of which the coding is. For example, I118*(NER Model!M46)/SQRT(Parameters!M25)), in "NER Model, Chyulu Hills_Forest_NERs_V2.xlsm" Also it is unclear if the coding corresponds to the correct Columns in "Parameters, Chyulu Hills_Forest_NERs_V2.xlsm".
NCR/CL/OFI Round 2	CL: Please clearly explain how the coding applied in the NERs workbook is in line with the methodology..

Response from Project Proponent Round 2	Certainly, the code had a lost cell. The estimation was updated both using the correct cell to include the parameter standard deviation of the state observations and also, the parameter spatial points in the reference area for the correct year. Please verify in NER Model, Chyulu Hills_Forest_NERs_V3.xlsm and Chyulu Hills_Grassland_NERs_V3.xlsm
Aster Global Findings Round 3	Please clarify the exact definition of "U_P^[m]". In other words, The inclusion of previous uncertainty ("6.50818547574296" for Forest and "4.663566354" for Grassland) for this monitoring period is unclear. (This question should have been asked earlier but the definition of "U_P^[m]" is unclear in the methodology). In addition, please check if the correct formula has been applied for the calculation of Cells H121 (Forest) & H115 (Grassland) in "Parameters" tabs.
NCR/CL/OFI Round 3	CL: Please address why previous uncertainties were included in the estimation of "U_P^[m]". Please also check the equation for Cells H121 (Forest) & H115 (Grassland) in "Parameters" tabs.
Response from Project Proponent Round 3	1. We included the values for standar error in the parameter sheet for Grassland please refer to cells H115:H117 and for Forest refer to cells H121:H123 Uncertainty is following equation B.34 which accounts for all carbon stocks used in the current monitoring. In this sense we are using two values: - biomass that comes from the plots monitored in this monitoring period and, - soils that comes from the previous monitoring period, as we did not monitored soil in this period,the values of uncertainty of the soil come from that data. 2.The mistake was corrected, we included the value for soil in forest = 23.84087921. Please refer to the soil data from the previous monitoring period "Chyulu Hills Soil Data Worksheet First Verification.xls" 3. The mistake was corrected, we included the value for soil in grassland = 27.64114744. Please refer to the soil data from the previous monitoring period "Chyulu Hills Soil Data Worksheet First Verification.xls" 4. it is true, this mistake was corrected.
Aster Global Findings Round 4	The audit team confirmed that "U_P^[m]" was updated with correct an equation and numbers "Parameters, Chyulu Hills_Forest_NERs_V3.xlsm/Chyulu Hills_Grassland_NERs_V3.xlsm". This item is closed.

Findings Number	32
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Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	VCS	8.4.1.1 Determining Deductions for Uncertainty
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	VCS	MR.68 The confidence deduction and estimated standard errors used to determine the confidence deduction.
Requirement Met (Y, N or Pending)		Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)		Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1		As required by the methodology, please include more details about confidence deduction in "210710_ChyluluHills_MR_VCS_CCB_final.docx".
NCR/CL/OFI Round 1		CL: Please address in line with findings.
Response from Project Proponent Round 1		Included in Section 3.2.4.2 Monitoring Plan
Aster Global Findings Round 2		The audit team confirmed the update of relevant content as per M.68 in "3.2.4.2 Determining Deductions for Uncertainty, 211229_ChyluluHills_MR_VCS_CCB_Findings_LHE_CHT_SBE_FINAL.docx". This item is closed.

Findings Number	33	
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	VCS	8.4.1.1 Determining Deductions for Uncertainty
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	VCS	MR.69 Reference to calculations used to determine the confidence deduction.
Requirement Met (Y, N or Pending)		Y

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	As required by the methodology, please include reference to confidence deduction along with more details about confidence deduction in "210710_ChyluluHills_MR_VCS_CCB_final.docx".
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	Included in Section 3.2.4.2 Monitoring Plan
Aster Global Findings Round 2	The audit team confirmed the update of relevant content as per M.69 in in "3.2.4.2 Determining Deductions for Uncertainty, 211229_ChyluluHills_MR_VCS_CCB_Findings_LHE_CHT_SBE_FINAL.docx". This item is closed.

Findings Number	34
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	8.4.1.1 Determining Deductions for Uncertainty
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	MR.70-71
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	Is linear model applicable for this project? What is the formula for linear model in "Cell E131, NER Model, Chyulu Hills_Forest_NERs.xlsm"?
NCR/CL/OFI Round 1	CL: Please address in line with findings.

Response from Project Proponent Round 1	According to section 8.4.1.2. of Methodology VM0009, the linear model is applied for type F-U1 and G-U1, these are the baseline types of the methodology. The methodology also says "The linear model may change from monitoring period to monitoring period as long as the GERs predicted by the linear model are conservatively less than [F.53]," The estimations for this period show that number calculated with F.53 are higher than linear approach, for this reason, this is applied. The Formula used is: Function $\text{LinModel}(\text{Max}, \text{time}, \text{t_PL}, \text{intercept})$ As Double 'Per section 8.4.1.2 of VM0009, Using a Linear Model for Gross Emissions Reductions 'Min = minimum cumulative baseline emissions reduction value over project lifetime 'Max = maximum cumulative baseline emissions reduction value over project lifetime 'time = Time since project start date 't_PL = Length of project crediting period slope = $\frac{\text{Max}}{\text{t_PL}}$ Dim results As Double result = slope * time + intercept DoEvents LinModel = result End Function Also refer to section 3.2.4.3
Aster Global Findings Round 2	The audit team agrees with the comments from the project proponent regarding the use of linear model as per the Methodology VM0009. However, why were the left tables from "Numeric Output, Chyulu Hills_Forest_NERs_V2.xlsm", which are not linear, included in "3.2.4.5 Quantifying Net Emissions Reductions for a PAA, 211229_ChyuluHills_MR_VCS_CCB_Findings_LHE_CHT_SBE_FINAL.docx"? Is this simply because "211229_ChyuluHills_MR_VCS_CCB_Findings_LHE_CHT_SBE_FINAL.docx" is not the final version? And the table "Cells H30:M34" in "Numeric Output, Chyulu Hills_Forest_NERs_V2.xlsm" does not match the table "Cells H18:M22" in "Numeric Output, Chyulu Hills_Grassland_NERs_V2.xlsm". Please also re-check Cells H:K52 in "Numeric Output, Chyulu Hills_Forest_NERs_V2.xlsm". Are Cells H:K52 calculated from linear model application?
NCR/CL/OFI Round 2	CL: Please address in line with findings.

Response from Project Proponent Round 2	For a more clear explanation and to cover some finding below, the excel Chyulu Hills_Total_NERs.xlsm was created. Please check Numeric output sheet where we the calculations are summarized
Aster Global Findings Round 3	The audit team confirmed the update of correct values in "Chyulu Hills_Total_NERs.xlsm.xlsx". This item is closed.

Findings Number	35
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	8.4.3 Quantifying Net Emissions Reductions for a PAA
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	MR.74 Quantified NERs for the current monitoring period including references to calculations.
Requirement Met (Y, N or Pending)	N
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Table 17 Quantifying Total Net Emissions Reductions, 220329_ChyuluHills_MR_VCS_CCB_Findings_4.docx
Aster Global Findings Round 5	The audit team noted that the value 7,996,111 in "Table 17 Quantifying Total Net Emissions Reductions, 220329_ChyuluHills_MR_VCS_CCB_Findings_4.docx" is not sourcing the correct number, referring to only forest from "Chyulu Hills_Total_NERs.xlsm.xlsx". Please update to the correct value.
NCR/CL/OFI Round 5	CL: Please address in line with findings.
Response from Project Proponent Round 5	The Project Proponent provided the updated document on June 7, 2022: 220607_ChyuluHills_MR_VCS_CCB_Findings_7_Clean.docx.
Aster Global Findings Round 6	The audit team confirmed that the calculations included in "220607_ChyuluHills_MR_VCS_CCB_Findings_7_Clean.docx" are all correct. This item is closed.

Findings Number	36
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	8.4.3 Quantifying Net Emissions Reductions for a PAA

Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	VCS Scope 3.0 2014	MR.75 Quantified NERs for the prior monitoring period.
Requirement Met (Y, N or Pending)		Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)		Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1		As required by the methodology, please include quantified NERs for the prior monitoring period. in "210710_ChyluluHills_MR_VCS_CCB_final.docx".
NCR/CL/OFI Round 1		CL: Please address in line with findings.
Response from Project Proponent Round 1		Please refer to section 3.2.4.5
Aster Global Findings Round 2		Pending closing of other related findings.
Aster Global Findings Round 3		The audit team confirmed the update of MR.75 in "3.2.4.5 Quantifying Net Emissions Reductions for a PAA, 220229_ChyluluHills_MR_VCS_CCB_Findings_2.docx". This item is closed.

Findings Number	37
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	VCS 8.4.3 Quantifying Net Emissions Reductions for a PAA
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	MR.76 A graph of NERs by monitoring period for all monitoring periods to date.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 210710_ChyuluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	As required by the methodology, please include a graph of NERs by monitoring period for all monitoring periods to date in "210710_ChyuluHills_MR_VCS_CCB_final.docx".

NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	Please refer to section 3.2.4.5
Aster Global Findings Round 2	Pending closing of other related findings.
Aster Global Findings Round 3	The audit team confirmed the update of MR.76 in "3.2.4.5 Quantifying Net Emissions Reductions for a PAA, 220229_ChyluluHills_MR_VCS_CCB_Findings_2.docx". This item is closed.

Findings Number	38
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	8.4.4 Determining Buffer Account Allocation
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	MR.77 Reference to the VCS requirements used to determine the buffer account allocation.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chylulu Hills_Forest_NERs.xlsm / Chylulu Hills_Grassland_NERs.xlsm / 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	Please provide a reference on how the buffer account allocation was determined.
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	please refer to section 3.2.4.6
Aster Global Findings Round 2	The audit team confirmed the updated in "3.2.4.6 Determining Buffer Account Allocation, 211229_ChyluluHills_MR_VCS_CCB_Findings_LHE_CHT_SBE_FINAL.docx" regarding the buffer allocation. This item is closed.

Aster Global Findings Round 5	The Buffer Account Allocation seems to be different from the previous versions. In other words, "Buffer (tCO ₂ e), MR. 77, 220329_ChyluluHills_MR_VCS_CCB_Findings_4.docx" is different from "Buffer (tCO ₂ e), Table 16. Total net emissions reductions, 220329_ChyluluHills_MR_VCS_CCB_Findings_3.docx", generating a difference in the final NERs. Please update to the correct values.
NCR/CL/OFI Round 5	CL: Please address in line with findings.
Response from Project Proponent Round 5	The Project Proponent provided the updated document on June 7, 2022: 220607_ChyluluHills_MR_VCS_CCB_Findings_7_Clean.docx.
Aster Global Findings Round 6	The audit team confirmed that the calculations included in "220607_ChyluluHills_MR_VCS_CCB_Findings_7_Clean.docx" are all correct. This item is closed.

Findings Number	39
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	8.4.6 Determining Vintages in a Monitoring Period
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	When the current monitoring period spans more than one calendar year, NERs must be allocated by year proportional to the number of calendars days in each year relative to the total number of days in the current monitoring period.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chylulu Hills_Forest_NERs.xlsm / Chylulu Hills_Grassland_NERs.xlsm / 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	Are vintages applicable for this monitoring period? Why do the numbers in "Table 28, MONIT_REP_1408_19SEP2013_31DEC2016.pdf" differ from "Vintages, Chylulu Hills_Forest_NERs.xlsm/Chylulu Hills_Grassland_NERs.xlsm"? Please clarify.
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	Please refer to section 3.2.4.5

Aster Global Findings Round 2	The audit team confirms that the purpose of "Vintages, Chyulu Hills_Forest_NERs_V2.xlsm/Chyulu Hills_Grassland_NERs_V2.xlsm" is to present future projections for NERs, comparing the two methodology for NER quantification: proxy area measurement and linear model. "Total NERs (tCO2e)" in "Vintages, Chyulu Hills_Forest_NERs_V2.xlsm/Chyulu Hills_Grassland_NERs_V2.xlsm" match "NERs (tCO2e)/Linear NERs (tCO2e)" in "NER Model, Chyulu Hills_Forest_NERs_V2.xlsm/Chyulu Hills_Grassland_NERs_V2.xlsm". This item is closed.
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Findings Number	40
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	8.4.8 Evaluating Project Performance
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	Project performance must be evaluated each monitoring event and deviations from ex-ante NERs must be described. Deviations in credit generation from ex-ante estimates may result from changes in the quality of data (literature estimates versus carbon stock estimates), occurrence of disturbance events or baseline re-evaluation.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	210710_ChyuluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	Project performance cannot be located in "210710_ChyuluHills_MR_VCS_CCB_final.docx".
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	The NERs presented in this monitoring report are significantly lower than the ex-ante estimates that were displayed in the CHRP PD. For the ex-ante estimates of project NERs the soil carbon was estimated by using the results of soil carbon sampling from the Kasigau Corridor REDD+ Project. This project is very close to the project and contains very similar soil types and ecosystems. However, for the previous verification soil sampling of the Project Area was performed completed, and the results showed a significantly smaller soil carbon pool than what was estimated. This monitoring period used the soil sampling of the previous period in order to have a conservative approach. Please refer to section 3.2.4.7

Aster Global Findings Round 2	The audit team confirmed the update of relevant content in " 3.2.4.7 Evaluating Project Performance, 211229_ChyluluHills_MR_VCS_CCB_Findings_LHE_CHT_SBE_FINAL.docx". This item is closed.
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Findings Number	41
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	9.2 Data and Parameters Monitored
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	E[m]ΔGER
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chylulu Hills_Forest_NERs.xlsm / Chylulu Hills_Grassland_NERs.xlsm / 3.1.2 Data and Parameters Monitored, 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	Where do the values in the table (i.e., 743,519 ... in "page 75, 210710_ChyluluHills_MR_VCS_CCB_final.docx") originate, and where is this value applied in this monitoring period? Please clarify.
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	
Aster Global Findings Round 2	The audit team confirmed the update of E[m]ΔGER in "E[m]ΔGER, 211229_ChyluluHills_MR_VCS_CCB_Findings_LHE_CHT_SBE_FINAL.docx". This item is closed.

Findings Number	42
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	9.2 Data and Parameters Monitored

Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	VCS	E[i]ΔNER
Requirement Met (Y, N or Pending)		Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)		Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 3.1.2 Data and Parameters Monitored, 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1		Where does the value "2,736,178" originate (page 76, 210710_ChyluluHills_MR_VCS_CCB_final.docx), and where is this value applied in this monitoring period? Please clarify.
NCR/CL/OFI Round 1		CL: Please address in line with findings.
Response from Project Proponent Round 1		The value comes from Numeric Output, Chyulu Hills_Forest_NERs_V2.xlsm. located in \Findings\FirstRound\Climate It was explained in section 3.1.2
Aster Global Findings Round 2		The table "Cells H30:M34" in "Numeric Output, Chyulu Hills_Forest_NERs_V2.xlsm" does not match the table "Cells H18:M22" in "Numeric Output, Chyulu Hills_Grassland_NERs_V2.xlsm". Please also re-check Cells H:K52 in "Numeric Output, Chyulu Hills_Forest_NERs_V2.xlsm". Are Cells H:K52 calculated from linear model application?
NCR/CL/OFI Round 2		CL: Please address in line with findings.
Response from Project Proponent Round 2		For a more clear explanation the excel Chyulu Hills_Total_NERs.xlsm was created. Please check Numeric output sheet where we the calculations are summarized
Aster Global Findings Round 3		The audit team confirmed the update in "Page 87, 220229_ChyluluHills_MR_VCS_CCB_Findings_2.docx". This item is closed.

Findings Number	43
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	VCS 9.2 Data and Parameters Monitored
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	VCS EB[m]

Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 3.1.2 Data and Parameters Monitored, 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	Where does the value "13,552,692.64" originate (page 76, 210710_ChyluluHills_MR_VCS_CCB_final.docx), and where is this value applied in this monitoring period? Please clarify.
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	The value comes from Numeric Output,Chyulu Hills_Forest_NERs_V2.xlsm. located in \Findings\FirstRound\Climate It was explained in section 3.1.2
Aster Global Findings Round 2	The audit team understands that this value should include baseline emissions from both forest and grassland. It is unclear how the value reported in the MR is in line with the methodology.
NCR/CL/OFI Round 2	CL: Please address in line with findings.
Response from Project Proponent Round 2	Values included for forest and grassland. For a more clear explanation the excel Chyulu Hills_Total_NERs.xlsm was created. Please check NER model sheet where the calculations are summarized
Aster Global Findings Round 3	The audit team confirmed the update in "Page 88, 220229_ChyluluHills_MR_VCS_CCB_Findings_2.docx". This item is closed.

Findings Number	44
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	9.2 Data and Parameters Monitored
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	EB[m-1]
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 3.1.2 Data and Parameters Monitored, 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	Where does the value "6,127,465.6" originate (page 77, 210710_ChyluluHills_MR_VCS_CCB_final.docx), and where is this value applied in this monitoring period? Please clarify.

NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	The value comes from Numeric Output,Chyulu Hills_Forest_NERs_V2.xlsm. located in \Findings\FirstRound\Climate It was explained in section 3.1.2
Aster Global Findings Round 2	The audit team understands that this value should include baseline emissions from both forest and grassland. It is unclear how the value reported in the MR is in line with the methodology.
NCR/CL/OFI Round 2	CL: Please address in line with findings.
Response from Project Proponent Round 2	Values included for forest and grassland. For a more clear explanation the excel Chyulu Hills_Total_NERs.xlsm was created. Please check NER model sheet where the calculations are summarized
Aster Global Findings Round 3	The audit team confirmed the update in "Page 88, 220229_ChyuluHills_MR_VCS_CCB_Findings_2.docx". This item is closed.

Findings Number	45
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	9.2 Data and Parameters Monitored
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	EB[m]Δ
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 3.1.2 Data and Parameters Monitored, 210710_ChyuluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	Where does the value "7,425,227" originate (page 77, 210710_ChyuluHills_MR_VCS_CCB_final.docx), and where is this value applied in this monitoring period? Please clarify.
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	The value comes from Numeric Output,Chyulu Hills_Forest_NERs_V2.xlsm. located in \Findings\FirstRound\Climate It was explained in section 3.1.2
Aster Global Findings Round 2	The audit team understands that this value should include baseline emissions from both forest and grassland. It is unclear how the value reported in the MR is in line with the methodology.
NCR/CL/OFI Round 2	CL: Please address in line with findings.

Response from Project Proponent Round 2	Values included for forest and grassland. For a more clear explanation the excel Chyulu Hills_Total_NERs.xlsm was created. Please check NER model sheet where the calculations are summarized
Aster Global Findings Round 3	The audit team confirmed the update in "Page 88, 220229_ChyuluHills_MR_VCS_CCB_Findings_2.docx". This item is closed.

Findings Number	46
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	9.2 Data and Parameters Monitored
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	EB[i]ΔBGB
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 3.1.2 Data and Parameters Monitored, 210710_ChyuluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	Where does the value "3,929,126" originate (page 77, 210710_ChyuluHills_MR_VCS_CCB_final.docx), and where is this value applied in this monitoring period? Please clarify.
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	The value comes from Numeric Output,Chyulu Hills_Forest_NERs_V2.xlsm. located in \Findings\FirstRound\Climate It was explained in section 3.1.2
Aster Global Findings Round 2	The audit team understands that this value should include baseline emissions from both forest and grassland. It is unclear how the value reported in the MR is in line with the methodology.
NCR/CL/OFI Round 2	CL: Please address in line with findings.
Response from Project Proponent Round 2	Values included for forest and grassland. For a more clear explanation the excel Chyulu Hills_Total_NERs.xlsm was created. Please check NER model sheet where the calculations are summarized
Aster Global Findings Round 3	The audit team confirmed the update in "Page 89, 220229_ChyuluHills_MR_VCS_CCB_Findings_2.docx". This item is closed.

Findings Number	47
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Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	VCS	9.2 Data and Parameters Monitored
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	VCS	EB[m]ΔSOC
Requirement Met (Y, N or Pending)		Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)		Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 3.1.2 Data and Parameters Monitored, 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1		Where does the value "4,015,226" originate (page 78, 210710_ChyluluHills_MR_VCS_CCB_final.docx), and where is this value applied in this monitoring period? Please clarify.
NCR/CL/OFI Round 1		CL: Please address in line with findings.
Response from Project Proponent Round 1		The value comes from Numeric Output, Chyulu Hills_Forest_NERs_V2.xlsm. located in \Findings\FirstRound\Climate It was explained in section 3.1.2
Aster Global Findings Round 2		The audit team understands that this value should include baseline emissions from both forest and grassland. It is unclear how the value reported in the MR is in line with the methodology.
NCR/CL/OFI Round 2		CL: Please address in line with findings.
Response from Project Proponent Round 2		Values included for forest and grassland. For a more clear explanation the excel Chyulu Hills_Total_NERs.xlsm was created. Please check NER model sheet where the calculations are summarized
Aster Global Findings Round 3		The audit team confirmed the update in "Page 90, 220229_ChyluluHills_MR_VCS_CCB_Findings_2.docx". This item is closed.
Findings Number		48
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	VCS	9.2 Data and Parameters Monitored

Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	VCS EB[i]ΔSOC
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 3.1.2 Data and Parameters Monitored, 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	Where does the value "4,015,226" originate (page 78, 210710_ChyluluHills_MR_VCS_CCB_final.docx), and where is this value applied in this monitoring period? Please clarify.
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	The value comes from Numeric Output, Chyulu Hills_Forest_NERs_V2.xlsm. located in \Findings\FirstRound\Climate It was explained in section 3.1.2
Aster Global Findings Round 2	The audit team understands that this value should include baseline emissions from both forest and grassland. It is unclear how the value reported in the MR is in line with the methodology.
NCR/CL/OFI Round 2	CL: Please address in line with findings.
Response from Project Proponent Round 2	Values included for forest and grassland. For a more clear explanation the excel Chyulu Hills_Total_NERs.xlsm was created. Please check NER model sheet where the calculations are summarized
Aster Global Findings Round 3	The audit team confirmed the update in "Page 91, 220229_ChyluluHills_MR_VCS_CCB_Findings_2.docx". This item is closed.

Findings Number	49
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	VCS 9.2 Data and Parameters Monitored
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	VCS EB[m]A
Requirement Met (Y, N or Pending)	Y

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 3.1.2 Data and Parameters Monitored, 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	Where does the value "399,235" originate (page 81, 210710_ChyluluHills_MR_VCS_CCB_final.docx), and where is this value applied in this monitoring period? Please clarify.
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	The value comes from Ner Model,Chyulu Hills_Forest_NERs_V2.xlsm. It was explained in section 3.1.2
Aster Global Findings Round 2	The audit team understands that this value should include baseline emissions from both forest and grassland. It is unclear how the value reported in the MR is in line with the methodology.
NCR/CL/OFI Round 2	CL: Please address in line with findings.
Response from Project Proponent Round 2	Values included for forest and grassland. For a more clear explanation the excel Chyulu Hills_Total_NERs.xlsm was created. Please check Numeric Output sheet where the calculations are summarized
Aster Global Findings Round 3	The audit team confirmed the update in "Page 94, 220229_ChyluluHills_MR_VCS_CCB_Findings_2.docx". This item is closed.

Findings Number	50
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	9.2 Data and Parameters Monitored
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	EL[m]
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 3.1.2 Data and Parameters Monitored, 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	Where does the value "530,287" originate (page 82, 210710_ChyluluHills_MR_VCS_CCB_final.docx), and where is this value applied in this monitoring period? Please clarify.
NCR/CL/OFI Round 1	CL: Please address in line with findings.

Response from Project Proponent Round 1	The value comes from Ner Model,Chyulu Hills_Forest_NERs_V2.xlsm. It was explained in section 3.1.2
Aster Global Findings Round 2	The audit team understands that this value should include baseline emissions from both forest and grassland. It is unclear how the value reported in the MR is in line with the methodology.
NCR/CL/OFI Round 2	CL: Please address in line with findings.
Response from Project Proponent Round 2	Values included for forest and grassland. For a more clear explanation the excel Chyulu Hills_Total_NERs.xlsm was created. Please check Numeric Output sheet where the calculations are summarized
Aster Global Findings Round 3	The audit team confirmed the update in "Page 94, 220229_ChyuluHills_MR_VCS_CCB_Findings_2.docx". This item is closed.

Findings Number	51
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	9.2 Data and Parameters Monitored
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	EL[m]ASF
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 3.1.2 Data and Parameters Monitored, 210710_ChyuluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	Is this parameter zero for this monitoring period (page 83, 210710_ChyuluHills_MR_VCS_CCB_final.docx)? Why does Cell F129 use Cell F120 for the calculation while Cells G:I120 do not? Please clarify.
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	The value comes from Ner Model,Chyulu Hills_Forest_NERs_V2.xlsm. It was explained in section 3.1.2 and 3.2.3.1.2
Aster Global Findings Round 2	The audit team understands that this value should include baseline emissions from both forest and grassland. It is unclear how the value reported in the MR is in line with the methodology.
NCR/CL/OFI Round 2	CL: Please address in line with findings.

Response from Project Proponent Round 2	Value included. For a more clear explanation the excel Chyulu Hills_Total_NERs.xlsm was created. Please check Numeric Output sheet where the calculations are summarized
Aster Global Findings Round 3	The audit team confirmed the update in "Page 96, 220229_ChyuluHills_MR_VCS_CCB_Findings_2.docx". This item is closed.

Findings Number	52
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	9.2 Data and Parameters Monitored
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	EL[m]ASG
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 3.1.2 Data and Parameters Monitored, 210710_ChyuluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	Is this parameter zero for this monitoring period (page 83, 210710_ChyuluHills_MR_VCS_CCB_final.docx)? Please clarify.
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	The value comes from Ner Model,Chyulu Hills_Forest_NERs_V2.xlsm. It was explained in section 3.1.2 and 3.2.3.1.2
Aster Global Findings Round 2	p_(L DEG)^[m] is 0 as per "Grassland leakage_final.xlsx". This item is closed.

Findings Number	53
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	9.2 Data and Parameters Monitored

Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	VCS	EP[m]Δ
Requirement Met (Y, N or Pending)		Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)		Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 3.1.2 Data and Parameters Monitored, 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1		Where does the value "133.880" originate (page 84, 210710_ChyluluHills_MR_VCS_CCB_final.docx), and where is this value applied in this monitoring period? Please clarify.
NCR/CL/OFI Round 1		CL: Please address in line with findings.
Response from Project Proponent Round 1		The value comes from Ner Model, Chyulu Hills_Forest_NERs_V2.xlsm. It was explained in section 3.1.2
Aster Global Findings Round 2		The audit team understands that this value should include baseline emissions from both forest and grassland. It is unclear how the value reported in the MR is in line with the methodology.
NCR/CL/OFI Round 2		CL: Please address in line with findings.
Response from Project Proponent Round 2		Values included for forest and grassland. For a more clear explanation the excel Chyulu Hills_Total_NERs.xlsm was created. Please check NER Model sheet where the calculations are summarized
Aster Global Findings Round 3		The audit team confirmed the update in "Page 97, 220229_ChyluluHills_MR_VCS_CCB_Findings_2.docx". This item is closed.

Findings Number	54
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	VCS 9.2 Data and Parameters Monitored
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	VCS EP[m]ΔBRN
Requirement Met (Y, N or Pending)	Y

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 3.1.2 Data and Parameters Monitored, 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	Where does the value "133.880" originate from (page 84, 210710_ChyluluHills_MR_VCS_CCB_final.docx), and where is this value applied in this monitoring period? Please clarify.
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	The value comes from Ner Model, Chyulu Hills_Forest_NERs_V2.xlsm. It was explained in section 3.1.2
Aster Global Findings Round 2	The audit team understands that this value should include baseline emissions from both forest and grassland. It is unclear how the value reported in the MR is in line with the methodology.
NCR/CL/OFI Round 2	CL: Please address in line with findings.
Response from Project Proponent Round 2	Values included for forest and grassland. For a more clear explanation the excel Chyulu Hills_Total_NERs.xlsm was created. Please check NER Model sheet where the calculations are summarized
Aster Global Findings Round 3	The audit team confirmed the update in "Page 97, 220229_ChyluluHills_MR_VCS_CCB_Findings_2.docx". This item is closed.

Findings Number	55
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	9.2 Data and Parameters Monitored
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	PL[m]DEG
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 3.1.2 Data and Parameters Monitored, 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	How was "0.20" determined (page 86, 210710_ChyluluHills_MR_VCS_CCB_final.docx)?
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	Please refer to Forest leakage_final.xlsx in the folder Findings\FirstRound\Climate

Aster Global Findings Round 2	This is confirmed via "Forest leakage_final.xlsx" check: Since Cell A11 is 1, Cell C11 is 0.20 as per "SOP - Chyulu Hills - Forest Leakage 04-15-2014[4].pdf". This item is closed.
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Findings Number	56
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	9.2 Data and Parameters Monitored
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	PL[m]CONG
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Chyulu Hills_Forest_NERs.xlsm / Chyulu Hills_Grassland_NERs.xlsm / 3.1.2 Data and Parameters Monitored, 210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	Please clarify if this parameter is zero (page 87, 210710_ChyluluHills_MR_VCS_CCB_final.docx).
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	Please refer to Grassland leakage_final.xlsx in the folder Findings\FirstRound\Climate
Aster Global Findings Round 2	This is confirmed via "Grassland leakage_final.xlsx" check: Since Cell C4 is 0, Cell E4 is 0 as per "SOP - Chyulu Hills Leakage Grassland 2014-04-15[4].pdf". This item is closed.

Findings Number	57
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	9.3 Description of the Monitoring Plan

Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	VCS Scope 3.0 2014	All plots must be measured for the first verification. All leakage plots, proxy area plots and project accounting area plots must be remeasured at least every five years, or after a significant event that changes stocks in the proxy or project accounting areas. Note that plots may not be re-measured every monitoring period if the length of the monitoring period is less than five years and there are no significant events that change carbon stocks. All heads of livestock being grazed within the project area must be measured for the first verification (unless deemed to be de minimis) and remeasured at least every five years.
Requirement Met (Y, N or Pending)		Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)		Excel spreadsheets
Aster Global Findings Round 1		Please clarify if proxy area plots were re-measured.
NCR/CL/OFI Round 1		CL: Please address in line with findings.
Response from Project Proponent Round 1		Not measured due to access constrains, however we did analyze the land cover of the plots with updated (2020) information. Please refer to folder Findings\FirstRound\Climate\Proxy. Please refer to section 3.2.1.6
Aster Global Findings Round 2		The audit team confirmed the update of relevant content in "3.2.1.6 Proxy areas, 211229_ChyluluHills_MR_VCS_CCB_Findings_LHE_CHT_SBE_FINAL.docx". This item is closed.

Findings Number	58
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	VCS 9.3 Description of the Monitoring Plan
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	MR.93 Description of plot sizes and layout (such as the use of nests and their sizes) for each carbon pool.
Requirement Met (Y, N or Pending)	Y

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	As required by the methodology, please include description of plot sizes for each carbon pool in "210710_ChyluluHills_MR_VCS_CCB_final.docx".
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	included in section 3.1.3
Aster Global Findings Round 2	The audit team confirmed the update of relevant content in "MR.93 Description of plot sizes and layout, 211229_ChyluluHills_MR_VCS_CCB_Findings_LHE_CHT_SBE_FINAL.docx". This item is closed.

Findings Number	59
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	9.3 Description of the Monitoring Plan
Approved VCS Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	MR.95 The estimated carbon stock, standard error of the total for each stock, and the sample size for each stratum in the area selected.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	As required by the methodology, please include the estimated carbon stock, standard error of the total for each stock, and the sample size for each stratum in the area selected for this monitoring period in "210710_ChyluluHills_MR_VCS_CCB_final.docx".
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	included in section 3.2.2.1

Aster Global Findings Round 2	The audit team confirmed the update of relevant content in "Table 8. Biomass Carbon Stocks, 211229_ChyluluHills_MR_VCS_CCB_Findings_LHE_CHT_SBE_FINAL.docx". The values were correctly sourced from "211126_Biomass_2020.xlsx". This item is closed.
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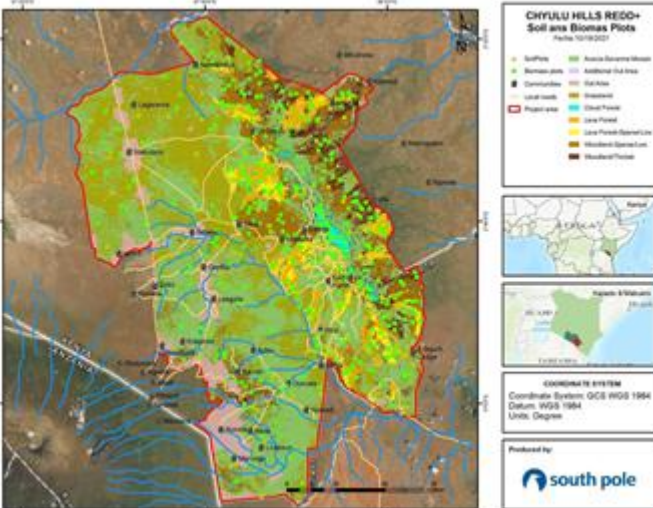
Findings Number	60
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Section)	9.3.3 Allometric Equations
Approved Methodology VM0009, Sectoral Scope 14 Version 3.0 06 June 2014 (Description)	9.3.3 When available, allometric equations from existing IPCC, government, or peer reviewed literature may be used. Equations should be derived from trees of a wide range of diameters and, if included, heights and should not be used beyond the size range for which they were developed. When equations are selected from literature, justification must be provided for their applicability to the project area considering climatic, edaphic, geographical and taxonomic similarities between the project location and the location in which the equation was derived. When possible, species-specific equations should be used. If generalized equations developed for wide scale application are used, they must be validated using the procedures below.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	210710_ChyluluHills_MR_VCS_CCB_final.docx
Aster Global Findings Round 1	As required by the methodology, please include the justification for allometric equations' applicability to the project area and the reference in "210710_ChyluluHills_MR_VCS_CCB_final.docx".
NCR/CL/OFI Round 1	CL: Please address in line with findings.
Response from Project Proponent Round 1	Please refer to Annex 7 - Allometry for PD v02.pdf in folder: Findings\FirstRound\Climate Please refer to section 3.1.3 of the MR
Aster Global Findings Round 2	The audit team confirmed the update of relevant content in "3.1.3.3 Sampling, 211229_ChyluluHills_MR_VCS_CCB_Findings_LHE_CHT_SBE_FINAL.docx". The audit team confirmed the receipt of the document "Allometry for PD v02.pdf". This item is closed.

APPENDIX C: CCB NCRS/CLS/OFI

G1 Original Conditions in the Project Area

Indicator G1.1 – The location of the project and basic physical parameters (e.g. soil, geology, climate).	The location of the project and basic physical parameters were described in the validated CCB Project Description (PD) and cannot change. Section 2.1.7 of the joint VCS/CCB Monitoring Report and Project Implementation Report (MR) provides project location description and section 1.2.1 of the validated PD provide location description and general descriptions of the geology, topography, soil, climate, precipitation, and hydrology of the project area.
Evidence Used to Assess Conformance:	Section 2.1.7 of the MR, Section 1.2.1 of the validated PD.
Findings:	The project location and mapping provided in the MR are consistent with the location and description provided within the validated PD. No changes in project location or basic physical parameters were identified. This indicator was successfully closed during project validation and does not need to be reopened. Item closed.
Date Closed:	17 September 2021

Indicator G1.2 – The types and condition of vegetation within the project area.	The original conditions of the project area were described in the validated PD and cannot change. For reference purposes, Section 1.3.1 of the PD provides a description of the types and condition of vegetation within the project area, with vegetation classes depicted by Figure 3. Figure 27 in the MR, with corresponding text in Section 5.3.2.2 identify land cover classes.
Evidence Used to Assess Conformance:	Section 1.3.1 of the PD, including Figure 3; Figure 27 of the MR
Findings:	The original types and condition of the vegetation within the project area is presented in the validated PD. This indicator was successfully closed during project validation and does not need to be reopened. Item closed.
Opportunity For Improvement (OFI):	One opportunity for improvement (OFI) was identified in the MR related to the use of consistent terminology for presentation of the types of vegetation within the project area. The vegetation type labeled in Figure 27 as “Barren” corresponds to the vegetation class labeled as “Grassland PAA” in PD Figure 3 and described as “Grassland” in the text of the PD and MR. Item closed. The proponent is free to respond to OFIs if desired, but no corrective actions are required.
Date Evaluated:	17 September 2021

Project Proponent Response/Actions and Date:	Figure 7 and 27 have been corrected in the MR with Grassland for consistent terminology.  (1 January 2022)
Evidence Used to Close OFI:	The Project Proponent opted to address the OFI. Revisions were made to the referenced figures in the revised MR. Note that referenced Figure 27 from the initial MR is now Figure 33 in the revised MR. Item closed.
Date Closed:	26 January 2022
Indicator G1.3 – The boundaries of the project area and the project zone.	The original conditions of the project area were described in the validated PD and cannot change. Section 1.2.2 and Figure 2 of the PD describe and depict the boundaries of the project area and project zone. Figure 1 of the MR depicts the project area.
Evidence Used to Assess Conformance:	Section 1.2.2 including Figure 2 of the PD, Figure 1 of the MR
Findings:	The Project Area for Phase I is described and depicted in a consistent manner to the validated PD. The Project Zone is not described or presented in the MR, but is not required to be restated or depicted by the CCB/VCS MR Template. This indicator was successfully closed during project validation and does not need to be reopened. Item closed.
Date Closed:	17 September 2021
Indicator G1.4 - Current carbon stocks within the project area(s), using stratification by land-use or vegetation type and methods of carbon calculation (such as biomass plots, formulae, default values) from the Intergovernmental Panel on Climate Change's 2006 Guidelines for National GHG Inventories for Agriculture, Forestry and Other Land Use5 (IPCC 2006 GL for AFOLU) or a more robust and detailed methodology.	“Current carbon stocks” refers to the carbon stocks at the start of the project, which was covered in the validated PD. Section 1.3.2 of the PD describes stratified current Carbon Stocks within the Project Area based on validations undertaken between January 2011 and June 2014, with summary of original condition of Current Carbon Stocks within the Project Accounting Area presented in Table 4 of the PD.

Evidence Used to Assess Conformance:	Section 1.3.2 of the PD
Findings:	This indicator refers to the carbon stocks at the start of the project, which was covered in the validated PD. This indicator was successfully closed during project validation and does not need to be reopened. Item closed.
Date Closed:	17 September 2021

Indicator G1.5 - A description of communities located in the project zone, including basic socio-economic and cultural information that describes the social, economic and cultural diversity within communities (wealth, gender, age, ethnicity etc.), identifies specific groups such as Indigenous Peoples and describes any community characteristics.	A description of the communities at the start of the project was provided in the validated PD and cannot change. Section 1.3.3 of the validated PD describes the communities identified within the Project Zone.
Evidence Used to Assess Conformance:	Section 1.3.3 of the validated PD
Findings:	This indicator refers to the communities at the start of the project, which was covered in the validated PD. No new communities were identified in the MR. This indicator was successfully closed during project validation and does not need to be reopened. Item closed.
Date Closed:	17 September 2021

Indicator G1.6 - A description of current land use and customary and legal property rights including community property in the project zone, identifying any ongoing or unresolved conflicts or disputes and identifying and describing any disputes over land tenure that were resolved during the last ten years (see also G5).	"Current land use and customary and legal property rights" refers to the use and rights at the start of the project, which was covered in the validated PD. Section 1.3.4 of the validated PD describes the current land use and customary and legal property rights in the Project Zone at the start of the project. Section 1.3.4 also describes an unresolved land dispute involving approximately 7,600 hectares of farming land in the northern portion of the Chyulu Hills National Park.
Evidence Used to Assess Conformance:	Section 1.3.4 of the validated PD.
Findings:	This indicator refers to land use and property rights at the start of the project, which was covered in the validated PD. Unresolved land dispute resolution status is covered by Indicator G5.4. The indicator referring to original condition of land tenure at project start was successfully closed during project validation and does not need to be reopened. Item closed.
Date Closed:	17 September 2021

Indicator G1.7 - A description of current biodiversity within the project zone (diversity of species and ecosystems) and threats to that biodiversity, using appropriate methodologies, substantiated where possible with appropriate reference material.	"Current biodiversity" and "threats" refers to the biodiversity at the start of the project, which was covered in the validated PD. Section 1.3.5 (and subsections) of the PD describes the biodiversity and threats within the Project Zone with more detailed description of biodiversity of the Project Area.
Evidence Used to Assess Conformance:	Section 1.3.5 of the PD.
Findings:	This indicator refers to the biodiversity and threats at the start of the project, which was covered in the validated PD.

	This indicator was successfully closed during project validation and does not need to be reopened. Item closed.
Date Closed:	17 September 2021
Indicator G1.8 - An evaluation of whether the project zone includes any of the following High Conservation Values (HCVs) and a description of the qualifying attributes. Indicator 8.1 - Globally, regionally or nationally significant concentrations of biodiversity values: a. protected areas b. threatened species c. endemic species d. areas that support significant concentrations of a species during any time in their lifecycle (e.g. migrations, feeding grounds, breeding areas). Indicator 8.2 - Globally, regionally or nationally significant large landscape-level areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance. Indicator 8.3 Threatened or rare ecosystems. Indicator 8.4 - Areas that provide critical ecosystem services (e.g., hydrological services, erosion control, fire control). Indicator 8.5 - Areas that are fundamental for meeting the basic needs of local communities (e.g., for essential food, fuel, fodder, medicines or building materials without readily available alternatives). Indicator 8.6 - Areas that are critical for the traditional cultural identity of communities (e.g., areas of cultural, ecological, economic or religious significance identified in collaboration with the communities).	Section 1.3.6 (and subsections) of the validated PD covers the evaluation for the presence of these HCVs within the project zone and lists the HCVs identified for each category of HCV indicator.
Evidence Used to Assess Conformance:	Section 1.3.6 of the PD
Findings:	This indicator refers to HCVs at the start of the project, which was covered in the validated PD. This indicator was successfully closed during project validation and does not need to be reopened. Item closed.
Date Closed:	17 September 2021

G2 Baseline Projections

Indicator G2.1 - Describe the most likely land-use scenario in the absence of the project following IPCC 2006 GL for AFOLU or a more robust and detailed methodology, describing the range of potential land use scenarios and the associated drivers of GHG emissions and justifying why the land-use scenario selected is most likely.	Baseline projections were covered in the validated PD and are not subject to change.
Evidence Used to Assess Conformance:	Section 4.5.1 of the PD
Findings:	This indicator was addressed during project validation and does not need to be reopened. Item closed.
Date Closed:	20 September 2021
Indicator G2.2 - Document that project benefits would not have occurred in the absence of the project, explaining how existing laws or regulations would likely affect land use and justifying that the benefits being claimed by the project are truly 'additional' and would be unlikely to occur without the project.	This indicator was covered in the validated PD and is not subject to change.
Evidence Used to Assess Conformance:	Section 4.5.1 of the PD references the VCS Additionality tool used by the project proponent.
Findings:	Section 4.5.1 of the PD references the VCS Additionality tool used by the project proponent, and Section 4.6 of the PD describes steps taken to evaluate and confirm compliance with minimum requirements for demonstrating additionality. This indicator was addressed during project validation and does not need to be reopened. Item closed.
Date Closed:	20 September 2021
Indicator G2.3 - Calculate the estimated carbon stock changes associated with the 'without project' reference scenario described above. This requires estimation of carbon stocks for each of the land-use classes of concern and a definition of the carbon pools included, among the classes defined in the IPCC 2006 GL for AFOLU. The timeframe for this analysis can be either the project lifetime (see G3) or the project GHG accounting period, whichever is more appropriate. Estimate the net change in the emissions of non-CO2 GHG emissions such as CH4 and N2O in the 'without project' scenario. Non-CO2 gases must be included if they are likely	This indicator was covered in the validated PD and is not subject to change.

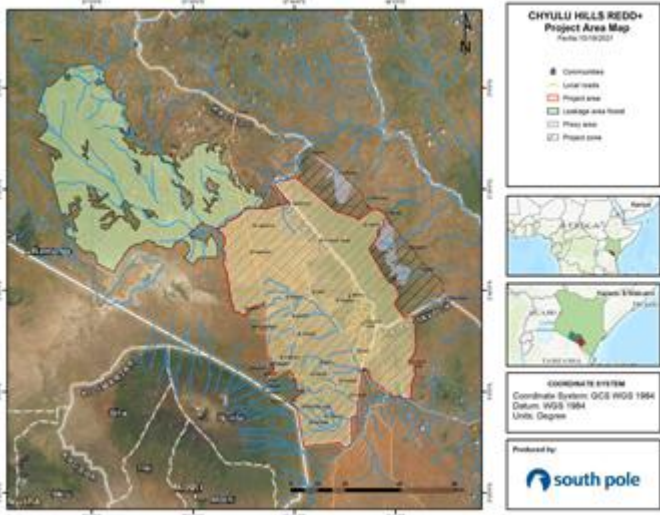
to account for more than 5% (in terms of CO ₂ -equivalent) of the project's overall GHG impact over each monitoring period.	
Projects whose activities are designed to avoid GHG emissions (such as those reducing emissions from deforestation and forest degradation (REDD), avoiding conversion of non-forest land, or certain improved forest management projects) must include an analysis of the relevant drivers and rates of deforestation and/or degradation and a description and justification of the approaches, assumptions and data used to perform this analysis. Regional-level estimates can be used at the project's planning stage as long as there is a commitment to evaluate locally-specific carbon stocks and to develop a project-specific spatial analysis of deforestation and/or degradation using an appropriately robust and detailed carbon accounting methodology before the start of the project.	
Evidence Used to Assess Conformance:	Sections 4.2 through 4.5 of the PD
Findings:	This indicator was addressed during project validation and does not need to be reopened. Item closed.
Date Closed:	20 September 2021

Indicator G2.4 - Describe how the 'without project' reference scenario would affect communities in the project zone, including the impact of likely changes in water, soil and other locally important ecosystem services.	Section 4.5.2 of the PD describes potential effects on communities within the project zone in the absence of the project. This indicator was covered in the validated PD and is not subject to change.
Evidence Used to Assess Conformance:	Section 4.5.2 of the PD
Findings:	This indicator was addressed during project validation and does not need to be reopened. Item closed.
Date Closed:	20 September 2021

Indicator G2.5 - Describe how the 'without project' reference scenario would affect biodiversity in the project zone (e.g., habitat availability, landscape connectivity and threatened species).	Section 4.5.3 of the PD describes potential effects on biodiversity within the project zone in the absence of the project. This indicator was covered in the validated PD and is not subject to change.
Evidence Used to Assess Conformance:	Section 4.5.3 of the PD
Findings:	This indicator was addressed during project validation and does not need to be reopened. Item closed.
Date Closed:	20 September 2021

G3 Project Design and Goals

Indicator G3.1 - Provide a summary of the project's major climate, community and biodiversity objectives.	Section 1.1 of the PD describes the project as a "multi-partner initiative designed to promote climate change mitigation and adaptation, restore biodiversity and create alternative livelihoods under the United Nation scheme of Reducing Emissions from Deforestation and forest Degradation (REDD+)"
Evidence Used to Assess Conformance:	Section 1.1 of the validated PD, Section 2.1.1.
Findings:	Section 2.1.1 of the MR provides a summary of the project's major climate, community, and biodiversity objectives that is consistent with the summary provided in the validated PD. Item closed.
Date Closed:	20 September 2021
Indicator G3.2 - Describe each project activity with expected climate, community and biodiversity impacts and its relevance to achieving the project's objectives.	Section 2.2 of the PD provides a description of the project activities. This indicator was not directly addressed in the MR, since it is a validation indicator, but various project activities are summarized in table format in section 1, and various activities are mentioned in other sections of the MR, including sections 2.1.10, 3.3.1, 4.1.1, 4.4, 5.1.1, and 5.3. For reference, the five project activity areas identified in the PD to serve as a framework for activity implementation are: 1) Poverty Reduction and Livelihood Diversification; 2) Food Security; 3) Improvement of Education; 4) Ecosystem Enhancement; and 5) Biodiversity Conservation.
Evidence Used to Assess Conformance:	Section 2.2 of the PD, Sections 1 and 2.1.10 of the MR.
Findings:	The project activities along with expected climate, community, and biodiversity impacts and relevance to achieving the project's objectives were described in the PD. Implementation of specific project activities are addressed under the appropriate indicators within the climate, community, and biodiversity sections. Item closed.
Date Closed:	20 September 2021
Indicator G3.3 - Provide a map identifying the project location and boundaries of the project area(s), where the project activities will occur, of the project zone and of additional surrounding locations that are predicted to be impacted by project activities (e.g. through leakage).	Figure 1 of the PD depicts the project location and boundaries of the project area, and Figure 2 of the PD depicts the project zone and Figure 21 of the PD depicts the leakage areas for the project accounting areas (forest and grassland). Figures 1 and 2 of the MR depicts the project location and boundaries of the project area, and Figure 2 of the MR also depicts the leakage area for the forest project accounting area.
Evidence Used to Assess Conformance:	Figures 1, 2, and 21 of the PD; Figures 1 and 2 of the MR
Findings:	The MR does not provide a map depicting the project zone, and does not provide a map depicting the leakage zone identified in the PD for the grassland project accounting area. Rules for the Use of the CCB Standards state the PIR does not need to include information for indicators that has not changed from the validated PD. Item closed.
Opportunity for Improvement (OFI):	One opportunity for improvement (OFI) was identified in the MR related to presenting mapping depicting the project

	zone and each of the leakage areas identified for the project accounting areas. Item closed. The proponent is free to respond to OFIs if desired, but no corrective actions are required.
Date Evaluated:	20 September 2021
Project Proponent Response/Actions and Date:	The map with the project zone, project area, and leakage areas was corrected and included as Figure 1 in the MR.  (1 January 2022)
Evidence Used to Close OFI:	The Project Proponent opted to address the OFI. Revisions were made to include and label the project zone on the referenced figure in the revised MR. Item closed.
Date Closed:	26 January 2022

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

PD Section 1.7 and MR Section 2.1.6 identify the same project lifetime as 30 years beginning on 19 September 2013, with the same 30-year period identified as the GHG accounting period.

MR Section 2.1.9 states that the project has not sought nor received any other GHG environmental credit or has been registered under any other GHG program. MR Section 2.1.10 identifies sustainable development contributions of the project. MR Section 2.2.1 provides an implementation schedule of the project including milestones in the project's development and implementation so far, along with project and crediting end date.

MR Section 2.2.2 states that there are no deviations from the methodology, but further states that the "deviation does not negatively impact the conservativeness of the quantification of GHG emission reductions or removals" and that the "deviations relate only to the criteria and procedures for monitoring or measurement, and do not relate to any other part of the methodology."

MR Section 2.2.3 states that no minor changes "in relation to community and biodiversity occurred during this monitoring period" but makes no statement regarding minor

	changes to project description regarding climate or carbon stock. MR Section 2.2.4 states that there are no project description deviations.
Evidence Used to Assess Conformance:	Sections of the PD and MR referencing project start dates, lifetime, and crediting periods; section 2.2.1 of the MR and milestones in implementation identified in PD sections 1.6 and 1.7; sections of the MR related to methodology deviations, project description deviations, and minor changes to the project description; and interviews with project proponent and project partners.
Findings:	Project lifetime and GHG crediting period are consistent between the PD and MR. Implementation schedule presented in the MR lists key milestones in the project's development and implementation but does not list milestones related to mandatory baseline reevaluations. Statement in the MR, supported by interviews with project partners, and reliance on CCB Program Rules v3.1 section 4.3.7 were used as confirmation that the project is not seeking nor has received any other GHG environmental credit or has been registered under any other GHG program, or other environmental credit since the last verification. The MR contains statements that appear to contradict the statement that there are no deviations from the methodology. Verification Report guidance for Indicator G3.4 requires the auditor to list any previously validated methodology deviations, project description deviations, and minor changes to the project description.
Clarification Request (CL):	Please clarify whether there have been any deviations from the methodology, and please provide a list of any previously validated methodology deviations, project description deviations, and minor changes to the project description. Please clarify why the mandatory baseline reevaluations identified in PD Section 1.7 are not considered milestones to be included in the implementation schedule in the MR.
Date Issued:	20 September 2021
Project Proponent Response/Actions and Date:	The mandatory re-evaluations identified in the PD section 1.7 were included in the implementation schedule (G3.4). There was a "Methodology Deviations" (section 2.2.2) and a "minor changes to project description" (section 2.2.3) explained in the MR Sections 2.2.2 and 2.2.3. (1 January 2022)
Evidence used to close CL:	The MR has been updated to include mandatory baseline re-evaluations in the implementation schedule. The MR has been updated to include explanations for the VCS methodology deviation and the minor changes to project description. The minor changes to project description were related to monitoring or monitoring frequency associated with Community and Biodiversity Indicators identified as part of the monitoring plan in the PD. The VVB has reviewed the explanations provided for the relevant indicators. The VVB has also considered potential discrepancies noted in findings for Indicators CM3.1,

	CM3.2, B3.1, and B3.2 regarding which indicators were required by the community and biodiversity monitoring plans. Based on site observations and interviews with project partners, project staff, and community members during the site visit, the VVB concurs that the indicators not monitored or reported at the frequency identified by the monitoring plan in the PD or the indicators identified in the Community and Biodiversity Monitoring spreadsheet would not likely result in a significant change in the outcome for determining overall project impacts on community or biodiversity. In accordance with CCB Program Rules (v3.1) Section 3.5.6, the VVB has determined that the inconsistencies identified in community and biodiversity monitoring for the monitoring period under verification would represent minor changes in project activities but do not represent changes that would be considered substantial enough to make verification impossible or that would be required to be addressed through a project description deviation. Additional considerations related to the monitoring plans are presented separately in findings for Indicators CM3.1, CM3.2, and B3.1. Item closed.
Date closed:	27 January 2022
Indicator G3.5 - Identify likely natural and human-induced risks to the expected climate, community and biodiversity benefits during the project lifetime and outline measures adopted to mitigate these risks.	For reference purposes, Section 2.3 of the validated PD identifies the following natural and human-induced risks: 1) Slash and Burn / Unsustainable Agriculture; 2) Charcoal burning, wood carvings, and firewood collection; 3) Poaching; 4) Anthropogenic fires; 5) Droughts; 6) Fires; 7) Kenya's political stability; 8) Legislative changes; 9) Risk of reversal (due to community unrest); and 10) Insufficient Revenues.
Evidence Used to Assess Conformance:	PD Section 2.3, MR Section 2.2.5, site visit, and site visit interviews
Findings:	The PD identifies 10 specific risks to the expected climate, community, and biodiversity benefits during the project lifetime and outlines measures expected to mitigate these risks. MR Section 2.2.5 identifies one risk, fire, and outlines measures adopted to mitigate this risk. The site visit and site visit interviews with project partners and community members provided confirmation for the implementation or progress towards implementation of mitigation measures identified for adoption in the PD for the fire risk as well as the other risks identified in the PD. Site visit interviews identified that consideration is being given to the subdivision of one or more of the partnering Group Ranches, which the auditor identified as a concern for risk of reversal that could affect climate, community, and biodiversity benefits during the project lifetime.
Non-conformance Request (NCR):	Indicator G3.5 requires outlining of measures adopted to mitigate the likely natural and human-induced risks. Please provide the mitigation measures adopted for each of the risks identified in the validated PD.

Date Evaluated:	21 September 2021
Project Proponent Response/Actions and Date:	Section 2.2.5 was complemented with the description for each of the risks identified for the Project from the validated PD and, with the mitigation measures adopted were outlined. (1 January 2022)
Evidence Used to Close NCR:	The MR has been updated to include a description of each of the likely natural and human-induced risks identified in the PD along with a summary of the actions implemented to mitigate each risk. Additional detail is provided in the updated MR in the sections referenced under the summaries provided in the table in Section 2.2.5. The VVB had previously substantiated representative examples of the implemented actions as part of the VVB site visit and interviews. The site visit and interviews substantiate reasonable steps have been implemented to mitigate the identified natural and human-induced risks to the project benefits. An opportunity for improvement was noted for addressing a typographical error in the "Potential Impact of Risk..." column for Poaching – a portion of the sentence appears to have been cut off. An OFI does not need to be addressed to close out this finding. Item closed.
Date Closed:	26 January 2024
Evidence Used to Close OFI	The Project Proponent opted to address the OFI. The VVB confirmed the sentence fragment has been removed from the table in MR Section 2.2.5.

Indicator G3.6 - Demonstrate that the project design includes specific measures to ensure the maintenance or enhancement of the high conservation value attributes identified in G1 consistent with the precautionary principle.	For reference, the HCVs identified in G1 validated as present in the project zone as detailed in PD Section 1.3.6 include: G1.8.1) globally, regionally or nationally significant concentrations of biodiversity values for a) protected areas, b) threatened species, c) endemic species, and d) areas that support significant concentrations of a species during any time in their lifecycle; G1.8.2) globally, regionally or nationally significant large landscape-level areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance; G1.8.3) threatened or rare ecosystems; G1.8.4) areas that provide critical ecosystem services for hydrological services and erosion control; G1.8.5) areas that are fundamental for meeting the basic needs of local communities, specifically provisioning services for pastoralists; NTFPs and medicinal plants; and fodder and grazing land. G1.8.6) areas that are critical for the traditional cultural identity of communities (left in PD as to be determined in collaboration with local communities).
Evidence Used to Assess Conformance:	PD Sections 1.3.6 and 2.4, MR Section 2.2.6, MR Section 3.3, MR Sections 4 and 5 (including subsections), site visit,

	and site visit interviews with project partners and community members
Findings:	The MR summarizes protection measures implemented to ensure the maintenance or enhancement for most of the HCVs identified in PD Section 1.3.6. This information is not fully summarized in Section 2.2.6 of the MR, but much of the information is presented in other sections of the MR. The site visit and interviews with project partners and community members substantiated measures identified for maintaining or enhancing the HCVs have been implemented or are in the process of being implemented. The MR does not provide specific actions needed nor implemented to address the HCV indicator G1.8.6 regarding actions identified in PD section 1.3.6 to identify areas that are critical for the traditional cultural identity of communities.
Clarification Request (CL):	In section 2.2.6 of the MR please provide clarification for the full range of actions needed or implemented to ensure the maintenance or enhancement of the high conservation value attributes identified in the project description. Please specifically provide actions needed and implemented to address the HCV indicator G1.8.6 regarding actions identified in PD section 1.3.6 to identify areas that are critical for the traditional cultural identity of communities.
Date Evaluated:	21 September 2021
Project Proponent Response/Actions and Date:	Section 2.2.6 has been complemented specifying the actions addressed to ensure the maintenance or enhancement of the high conservation value attributes identified in the project description. As was previously mentioned in section 4.1.3, HCVs in the category for the indicator G1.8.6, Areas that are critical for the traditional cultural identity of communities, are sacred sites within the project zone's forests, which have not been identified in the Project Area. This clarification was also included as a footnote in Section 2.2.6. (1 January 2022)
Evidence Used to Close CL:	The actions implemented to ensure the maintenance or enhancement of the identified HCVs have been provided in the appropriate sections of the MR. Site visit observations and interviews had previously determined these actions had been or were being undertaken during the reporting period. Item closed.
Date Closed:	26 January 2022
Indicator G3.7 - Describe the measures that will be taken to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime.	PD Section 2.3.2 identifies several measures planned to be taken to enhance CCB benefits beyond the project lifetime. MR Section 2.2.7 identifies several measures that have been undertaken or that have been identified to plan for continuing benefits beyond the project lifetime, including promoting cross-collaboration mechanisms, developing strong governance, building institutional capacity, identifying other payment for ecosystem services options,

	and beginning to develop an endowment so that project activities can be continued after the end of the crediting period.
Evidence Used to Assess Conformance:	PD Section 2.3.2, MR Section 2.2.4, site visit interviews with project partners and community members
Findings:	The MR addresses some, but not all measures identified in the PD as planned to be undertaken to enhance CCB benefits beyond the project lifetime. The Verification Report Guidance requires that auditors verify the actions needed or implemented to maintain and enhance the CCB benefits beyond the project lifetime, as identified by the project proponent. Site visit interviews with project partners and community members support the implementation or progress on implementation for activities listed in the MR as well as activities listed in the PD not listed in the MR.
Clarification Request (CL):	Please provide clarification in MR Section 2.2.7 for the status of the full range of actions identified by PD Section 2.3.2 that are in the process of being implemented to maintain and enhance the climate, community, and biodiversity benefits beyond the project lifetime.
Date Evaluated:	21 September 2021
Project Proponent Response/Actions and Date:	The full range of actions identified by PD Section 2.3.2 have been complemented in MR Section 2.2.7: Education, Poverty reduction, Creation of Alternative Income Generating Activities (IGAs) and Sustainable management of natural resources and sustainable agriculture; (1 January 2022)
Evidence Used to Close CL:	The MR has been updated to describe the status of implementation for all measures identified in the PD as needing to be taken to maintain and enhance the CCB benefits beyond the project lifetime. Based on site visit observations and interviews with project partners and community members, the VVB concurs that reasonable measures were being undertaken during the reporting period to maintain and enhance the project's CCB benefits beyond the project lifetime. Item closed.
Date Closed:	26 January 2022

Indicator G3.8 - Document and defend how communities and other stakeholders potentially affected by the project activities have been identified and have been involved in project design through effective consultation, particularly with a view to optimizing community and stakeholder benefits, respecting local customs and values and maintaining high conservation values. Project developers must document stakeholder dialogues and indicate if and how the project proposal was revised based on such input. A plan must be developed to continue communication and consultation between project managers and all	PD Section 2.7.1 provides detailed accounting of the process of community and stakeholder identification and involvement in project design. The PD describes the community outreach and FPIC activities that was undertaken at project onset, and identifies ways in which project information is communicated to the project partners and communities. The PD describes the advisory committees associated with project partners, and summarizes the ways in which each committee provides continued input, and identifies frequency of planned meetings. MR Section 2.3.1 summarizes the community outreach initiated in during this verification period to gather input on the community-identified priorities for the use of REDD+ funding when the funds became available.
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community groups about the project and its impacts to facilitate adaptive management throughout the life of the project.	
Evidence Used to Assess Conformance:	PD Section 2.7, MR Section 2.3.1; site visit interviews with community members and site observations of community notice boards; supporting documentation provided from community outreach meetings. Including agendas, attendee lists, meeting minutes
Findings:	Site visit interviews with project partners and community members substantiated that community meetings and advisory committee meetings have been held in accordance with the plans summarized in the PD. The site visit interviews with community members consistently identified satisfaction with the amount of communication from “REDD” project personnel and agreement that community groups have input into determining project activities. Community notice boards at two planned stops and one spontaneous stop confirmed the posting of project information. Supporting documentation for community outreach meetings substantiates community involvement in setting priorities at the local level, with site visit interviews confirming widespread community knowledge of these meetings and opportunities for input. Item closed.
Date Closed:	24 September 2021

Indicator G3.9 - Describe what specific steps have been taken, and communications methods used, to publicize the CCBA public comment period to communities and other stakeholders and to facilitate their submission of comments to CCBA. Project proponents must play an active role in distributing key project documents to affected communities and stakeholders and hold widely publicized information meetings in relevant local or regional languages.	MR Section 2.3.2 identifies specific actions taken to distribute the MR to project partners and to make it available for community review, and actions taken to publicize the availability of the MR and notifying the communities of public comment period. The MR states that local authorities and communities have been informed through emails, formal letter, and phone calls, with important information displayed on community information boards located in strategic locations; that the MR and results of the community monitoring have been made available for public review at the Project Office and office of each project partner; that a MR summary has been written in English, Swahili, and Maa and provided to communities throughout the project area; that the MR has been posted on the CCB website; and that information was provided during community meetings in March 2021 and through additional community outreach in July 2021.
Evidence Used to Assess Conformance:	MR Section 2.3.2 compared to PD Section 2.7.2; site visit observations and site visit interviews with project partners and community members
Findings:	Site visit observations of community information boards at two planned and one spontaneous stop confirmed posting of information publicizing the public comment period for the monitoring report and visit by the audit team. Site visit observations and site visit interviews confirmed the widespread understanding of the availability of the MR, the public comment period, and the audit team visit. Site visit observations and site visit interviews confirmed that project

	implementation and monitoring information, and other key documents, were distributed to communities and other stakeholders during the monitoring period and that widely publicized information meetings were held in relevant local or regional languages, with Swahili and Maa used as determined appropriate for specific audiences. The site visit interviews substantiated that although many of the community members could communicate fluently in English, or more commonly Swahili, some community members were not fluent in either Swahili or English. CCB Program Rules v3.1 section 3.5.12 requires that for projects located in countries for which English is not a widely used language among communities, the project proponent shall develop at least a summary of the project description and/or monitoring report in a relevant local or regional language. Two of the three community information boards reviewed had at least portions of project monitoring summaries posted in Swahili. CCB Program Rules v3.1 section 4.3.4 requires that prior to verification, the project submit the “draft monitoring language report summary” as necessary to meet the requirements set out in Rules sections 3.5.11 - 3.5.12. The audit team has not been provided with the project summary, and a project summary has not been posted on the Verra project webpage as of the date of this finding. The audit team has not been provided with copies of the project summaries reported by the MR as having been prepared in Swahili and Maa and these documents have not been posted on the Verra project webpage as of the date of this finding.
Non-conformance Request (NCR):	In addition to documenting compliance with the CCB rule regarding preparing and posting of the monitoring report summary to the Verra site, the audit team is required to verify that communication and consultation with stakeholders was carried out in accordance with the communication and consultation plan. The audit team is requesting copies of the project summaries reported in MR section 2.3.3 as having been prepared in English, Swahili, and Maa.
Date Evaluated:	24 September 2021
Project Proponent Response/Actions and Date:	A copy of the summaries of the project in Swahili and Maa are in the folder Findings\FirstRound\MR Summary other language with a copy of the MR summary in Swahili. (1 January 2022)
Evidence Used to Close NCR:	The one-page executive summaries in Swahili and Maa were provided to the VVB for review. Preparation of the 1-page executive summary in Swahili and Maa languages meets this commitment identified in the PD. A copy of the Swahili-version fuller monitoring report summary was provided to the VVB for review. This Swahili-version monitoring report summary meets the criteria for content for the CCB Program Rules (v3.1), and was determined during the site visit to have been made

	available within the project zone communities. Although this Swahili-language full project summary document was not posted on the Verra webpage, the VVB determined that under the CCB Program Rules (v3.1) Section 3.5.12, posting of the Swahili-language monitoring report summary would not be requirement for verification based on substantiation that English is one of the official languages for Kenya and meets the requirements for being a language widely spoken in the country in which the project occurs. The VVB substantiated during site visit interviews that during the monitoring period relevant project information had been presented in Swahili or Maa as determined appropriate by project staff for the target audience in those meetings. The VVB project information in Swahili had been distributed to communities, and observed copies posted on 2 of 3 representative community information boards visited. Notifications in English and Swahili announcing the VVB site visit were observed on these boards Item closed.
Date Closed:	26 January 2022

Indicator G3.10 - Formalize a clear process for handling unresolved conflicts and grievances that arise during project planning and implementation. The project design must include a process for hearing, responding to and resolving community and other stakeholder grievances within a reasonable time period. This grievance process must be publicized to communities and other stakeholders and must be managed by a third party or mediator to prevent any conflict of interest. Project management must attempt to resolve all reasonable grievances raised, and provide a written response to grievances within 30 days. Grievances and project responses must be documented.	The grievance and redress procedure is described in the PD as an initial continuation of existing grievance procedures in use by the project partners, with a commitment to design a three-stage Feedback and Grievance Redress Procedure. The audit team was provided with a digital copy of the Chyulu Hills REDD+ Project Feedback and Grievance Redress Procedure, which is written in English (no version number or date).
Evidence Used to Assess Conformance:	Chyulu Hills REDD+ Project Feedback and Grievance Redress Procedure, PD section 2.7.3, MR section 2.3.4, site visit interviews with project partners and community members; review of representative Chief's grievance record book, review of predator-loss compensation program records.
Findings:	Site interviews with project partners, project staff, local community leaders, and community members substantiate the widespread knowledge about the presence of a grievance redress procedure, knowledge about the ways in which individuals may relay grievances concerning the "REDD project" or CHCT project office or staff, and knowledge about whom individuals may talk to directly if they have concerns. Site interviews determined that many minor grievances appear to be handled through the respective feedback and grievance redress procedures of

	project partners, as well as through traditional means within communities. The MR does not contain a summary of the grievances received during the monitoring period, nor the status of the grievances. The CCB/VCS Monitoring Report Template instructions for Section 2.3.4 requires the project proponent to provide information about how grievances have been received, resolved, and documented using the project's grievance redress procedure during the monitoring period.
Clarification Request:	The audit team is required to verify that the project proponent has implemented the project's grievance redress procedure according to the project's validated design, and must include details of the status of any grievances raised in the monitoring period. The audit team is requesting to be provided with a summary of the grievances received during the monitoring period concerning the Chyulu Hills Conservation Trust and activities under the Chyulu Hills REDD + Project, as well with the status of each grievance.
Date Evaluated:	24 September 2021
Project Proponent Response/Actions and Date:	During the MR period there were 4 grievances, 3 in 2016 and one in 2020. The information was included in the MR section 2.3.4 and in the folder Findings\FirstRound\Grievances. (1 January 2022)
Evidence Used to Close CL:	The VVB was provided with supporting documentation for the four grievances identified in the updated MR. Three of these grievances originated in 2016, prior to the reporting period under this current verification. Documentation provided to the VVB substantiates information provided during site interviews that these grievances along with the grievance originating in 2020 were properly documented and addressed in accordance with the project grievance process. Documentation provided to the VVB included copies of the filed grievance, documents demonstrating actions and dates of actions by Project staff, and other relevant documents involved in investigation of the grievance. The VVB is satisfied the project proponent has properly demonstrated that the project grievance process was properly implemented during the reporting period. Item closed.
Date closed:	26 January 2022
Indicator G3.11 - Demonstrate that financial mechanisms adopted, including projected revenues from emissions reductions and other sources, are likely to provide an adequate flow of funds for project implementation and to achieve the anticipated climate, community and biodiversity benefits.	This was not addressed in the MR and no guidance requiring this information is included in the verification report template.
Evidence Used to Assess Conformance:	
Findings:	Validation Item (see Indicator G4.7 for verification of project financial health)

Non-conformance Request (NCR):	n/a
Date Evaluated:	
Project Proponent Response/Actions and Date:	Financial analysis was included in the Folder Findings\FirstRound\NPRT\Other\Financial analysis v1 verification 20210429 FINAL (2). (1 January 2022)
Evidence Used to Close NCR:	This item is not required to be re-demonstrated following successful validation of the PD. The project proponent opted to provide additional support documents to demonstrate that financial mechanisms adopted are likely to provide an adequate flow of funds for project implementation and to achieve the anticipated CCB benefits. The VVB has reviewed the documents provided and concurs that these documents substantiate information discussed during site interviews and concurs that the projected flow of funds would likely be adequate to support the project in achieving anticipated CCB benefits. Item closed.
Date Closed:	26 January 2022

G4 Management Capacity and Best Practices

Indicator G4.1 - Identify a single project proponent which is responsible for the project's design and implementation. If multiple organizations or individuals are involved in the project's development and implementation the governance structure, roles and responsibilities of each of the organizations or individuals involved must also be described.	MR section 2.1.3 identifies Chyulu Hills Conservation Trust (CHCT) as the project proponent with Christopher Tuite identified as the contact person. MR section 2.1.3 also identifies the key project staff and roles, and summarizes governance of the CHCT. MR section 2.1.4 identifies the project partner organizations and provides the contact person for each.
Evidence Used to Assess Conformance:	Section 2.1.3 of the MR, title page of MR, responsible party for contracting of verification services
Findings:	The MR lists a single project proponent, CHCT, and provides a contact person for the project proponent. The MR lists additional key project personnel involved in the project's development and implementation along with their roles and responsibilities. The MR lists nine constituent CHCT Trustee partners of the Chyulu Hills REDD+ Project, identifies the contact person for each, and identifies the organization's role in the project. The MR summarizes the governance structure of the CHCT. Site visit interviews with project staff and project partners substantiated the involvement of each. Item closed.
Date Closed:	24 September 2021

Indicator G4.2 - Document key technical skills that will be required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills. Document the management team's expertise and prior experience implementing land	MR Section 2.4.1 identifies the required technical skills and expertise identified for management and implementation of the project. MR Section 2.1.3 Table 2 presents the key management personnel who have been involved in implementing the project. MR Section 2.1.4 presents project partner organizations and other key entities providing support to the project.
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management projects at the scale of this project. If relevant experience is lacking, the proponents must either demonstrate how other organizations will be partnered with to support the project or have a recruitment strategy to fill the gaps.	
Evidence Used to Assess Conformance:	MR Sections 2.4.1, 2.1.3, and 2.1.4, interviews with project staff, project partners, community members
Findings:	The present project management team has demonstrated their expertise and ability to implement and manage the CCB project. The partnership with two National Government agencies, the KWS and KFS, and three on-the-ground NGO as well as the support of CI provides reasonable assurances that the key technical and management skills are in place and expected to be in place for the project duration. The project also utilizes a consultant with experience and expertise with the CCB/VCS programs to provide technical expertise and coordination to help ensure compliance with the CCB/VCS programs. The project is also utilizing training and outreach to strengthen key technical and management skills of Group Ranch and community leadership personnel which further supports engagement of community leaders necessary for successful project implementation over the life of the project. Item closed.
Date Closed:	24 September 2021

Indicator G4.3 - Include a plan to provide orientation and training for the project's employees and relevant people from the communities with an objective of building locally useful skills and knowledge to increase local participation in project implementation. These capacity building efforts should target a wide range of people in the communities, including minority and underrepresented groups. Identify how training will be passed on to new workers when there is staff turnover, so that local capacity will not be lost.	MR section 2.4.2 describes worker training.
Evidence Used to Assess Conformance:	PD Section 2.6.1, MR section 2.4.2, site visit observations and site visit interviews
Findings:	Capacity building for community engagement, biodiversity assessment, and carbon measurement and monitoring skills has also been demonstrated through the recruitment and training of local community members for community engagement and survey skills, recruitment and training of local community members as rangers with additional training for wildlife data collection and management, and in partnering with the Kenya National Museum to train personnel in field botanical survey and sampling methodologies and protocols. All employees interviewed stated they had received training and considered it adequate. Most employees are from the local

	communities. Most of the managerial positions were substantiated as having been filled by local community members who had worked their way up through the organization to earn the positions. Site interviews substantiated that project-related skills and opportunities are being provided to employees so that local capacity will not be lost. Site interviews and observations confirm the knowledge and competence of project employees for implementing the project. Item closed.
Date Closed:	24 September 2021
Indicator G4.4 - Show that people from the communities will be given an equal opportunity to fill all employment positions (including management) if the job requirements are met. Project proponents must explain how employees will be selected for positions and where relevant, must indicate how local community members, including women and other potentially underrepresented groups, will be given a fair chance to fill positions for which they can be trained.	PD Section 2.6.2 outlines the proposed process for filling project job openings and MR Section 2.4.3 outlines how the project fills job openings, and references the CHCT Equal Opportunity Policy.
Evidence Used to Assess Conformance:	PD Section 2.6.2, MR Section 2.4.3, CHCT Equal Opportunity Policy, site interviews with project staff; MR Section 1.2
Findings:	Site observations and site interviews substantiate that most of the project's employees are from the local communities, including many in management or supervisory positions. Site visit interviews substantiate that project employment opportunities are publicly advertised, and current employees as well as community members in general believe the hiring process is open, fair, and non-discriminatory. Site visit observations and site visit interviews confirms that a number of women are employed by the project, including in supervisory or managerial positions. MR Template Section 1.2 requires quantifying the number of women employed in Project activities, expressed as the number of full-time employees, unless there are no means of quantifying this metric. The MR provides estimates of the number of new hires during the monitoring period and during the project lifetime, but does not provide a similar estimate for how many of these positions are held by women.
Clarification Request (CL):	Please provide clarification for why the number of women employed in Project activities is considered non-quantifiable for the monitoring period and project lifetime.
Date Evaluated:	27 September 2021
Project Proponent Response/Actions and Date:	Section 2.4.3 (G4.4) complemented in the MR. The REDD+ project partners adopted equal opportunity for women and men. The CHRP has been working with the women through their representation in various advisory committees.

	Finally, the CHRP has developed Project Activities to engage with women groups and help promote financial independence with projects like the grass seedbanks (10 local women are in charge of each area), beekeeping, and handcrafts. (1 January 2022)
Findings:	MR Section 2.4.3 has been updated to include information about involving women groups in project activities to improve their livelihood opportunities. Clarification was not provided for MR Section 1.2 for why the number of women employed in Project activities is considered non-quantifiable for the monitoring period and project lifetime. The MR states that across the project areas the project partners employ over 500 rangers, 61 teachers, and 5 community health workers, but does not provide a breakdown for the number of women represented.
Clarification Request (CL):	Please provide clarification as appropriate for why the number of women employed in Project activities is considered non-quantifiable for the monitoring period and project lifetime, or please provide appropriate quantification within MR Section 1.2.
Date Evaluated:	26 January 2022
Project Proponent Response/Actions and Date:	. The multi-partner structure of the project means that project activities are carried out through 9 different entities. REDD+ Project activities are also embedded within the programs and projects of these organisations. Some of their activities are segregated from and not funded by the REDD+ project whereas some are jointly supported by the REDD+ Project and other funding sources and some activities or infrastructure or personnel may be exclusively funded by the REDD+ Project. Furthermore, the proportion of programmes or projects that can be considered directly REDD+ supported changes over time. This presents a significant challenge to providing meaningful and comparable figures related to across all the entities and the project area. This is particularly challenging with the government entities where staff are rotated into offices that interact with the REDD+ project on a regular basis and those offices are part of large government institutions that operate across the whole country. Similarly, the Sheldrick Trust undertakes significant activities outside the REDD+ Project Area. For some activities that are solely related to the REDD+ project, such as employment as plot samplers or SBIA interviewers, we have ready access to the numbers of men and women. For the scholarships awarded, we again know the number of boys and girls. So we could provide indicators or examples but overall quantifying the “<i>number of women employed in Project activities, expressed as the number of full-time employees</i>” (MR Section 1.2) is extremely difficult in the context of the project as a whole. (28 February 2022)
Evidence Used to Close CL:	The VVB has reviewed the explanation provided by the Project Proponent and determined it provides clarification as requested. The VVB concurs that the under the

	circumstances identified, the Project Proponent would have difficulty in retroactively quantifying for the monitoring period under verification (01 January 2017 – 31 December 2020) the number of women employed in project activities, expressed as number of full-time employees. The VVB previously concluded based on documentation provided and substantiated through site visit observations and interviews that women have been provided equal opportunity to fill all employment positions (including management) if the job requirements are met. The VVB intends to issue a Forward Action Request (FAR) for the next VVB to assess efforts by the Project Proponent to track and report on the number of women directly working on project activities in return for compensation (financial or otherwise), including employees, contracted workers, sub-contracted workers and community members that are paid to carry out project-related work. Item closed.
Date Closed:	2 March 2022
Indicator G4.5 - Submit a list of all relevant laws and regulations covering worker's rights in the host country. Describe how the project will inform workers about their rights. Provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved.	PD Section 3.1.1 and MR Section 2.4.4 list relevant laws and regulations covering worker's rights in Kenya.
Evidence Used to Assess Conformance:	PD Section 3.1.1, MR Section 2.4.4, site visit interviews with project staff employed in various administrative and field-oriented activities
Findings:	During site visit interviews, employees of the project stated they were made aware of their rights as employees upon employment, that they believed they were being treated fairly, and to their knowledge their employment was in compliance with relevant labor laws and regulations. Employees engaged by the project on an unlimited basis confirmed they had been provided with employment contracts. Fixed-term employees engaged by project partners for specific project-funded activities confirmed the status of their employment. Indicator G4.5 and MR Template Section 2.4.4 require demonstration on how compliance is achieved for relevant labor laws and regulations. The auditor was unable to locate information in the MR on how compliance is documented or how achievement is demonstrated.
Clarification Request (CL):	Please clarify where in the MR information may be found on how compliance with relevant labor laws and regulations is documented or demonstrated, or provide information demonstrating this compliance.

Date Evaluated:	27 September 2021
Project Proponent Response/Actions and Date:	Section 2.4.4 was complemented by showing the CHRP document (Please refer to folder Findings\FirstRound\CHCT Employment Policies) that compiles all the policies concerning the hiring for employment or selection of individuals for participation in project activities in the Chyulu Hills REDD+ Project. It is also highlighted the pledge of the partners of the CHCT to work towards aligning their hiring and employment policies with these for their employees. Results are addressed in section 2.4.5 in terms of occupational safety and to section 1.2 and Table 16 in section 4.4 where is shown the hiring effort and the employees by partners, all of them complying with the mentioned policies. (1 January 2022)
Evidence Used to Close CL:	The MR has been updated to provide appropriate clarification through a summary of how compliance with relevant labor laws and regulations is documented or demonstrated. Site visit interviews with project partners substantiated the measures in place to ensure compliance. Item closed.
Date Closed:	26 January 2022

Indicator G4.6 - Comprehensively assess situations and occupations that pose a substantial risk to worker safety. A plan must be in place to inform workers of risks and to explain how to minimize such risks. Where worker safety cannot be guaranteed, project proponents must show how the risks will be minimized using best work practices.	PD Section 2.6.3 and MR Section 2.4.5 summarize measures planned and undertaken for ensuring workers' safety. Both documents reference the Health and Safety Plan, informing employees of risks, and training for employees.
Evidence Used to Assess Conformance:	PD Section 2.6.3, MR Section 2.4.5, site visit interviews with project staff employed in various administrative and field-oriented activities
Findings:	Site visit interviews with project staff, in particular staff who regularly work in the field, substantiate employees receive training related to safety and minimizing job-related risks. The MR states that the Health and Safety Plan provides a comprehensive list of measures that will be taken to inform employees of their rights, to assign roles and responsibilities to supervisors and workers, and provide a safe workplace culture; and that this document will be revised as needed to ensure that it contains current information and includes all job categories and potential risks. MR Section 2.4.5 further acknowledges the risks for occupations that require spending long periods in relatively remote and rugged areas. Indicator G4.6 requires that where worker safety cannot be guaranteed, project proponents must show how the risks will be minimized using best work practices. MR Section 2.4.5 states that a copy of the Health and Safety Plan has been provided to the verifier. A copy of this plan does not appear to have

	been included in the support documents provided to the auditor for the verification.
Clarification Request (CL):	Please provide a copy of the Health and Safety Plan for auditor review.
Date Evaluated:	27 September 2021
Project Proponent Response/Actions and Date:	A copy of the Health and Safety Plan is shared in the folder: Findings\FirstRound\Health and Safety Plan v4\ (1 January 2022)
Evidence Used to Close CL:	The VVB reviewed the copy of the CHCT Health and Safety Plan provided. The VVB concludes the CHCT Health and Safety Plan addresses risks identified for the range of different employees and provides information on minimizing those risks. Site visit observations and interviews previously substantiated employee knowledge of the Health and Safety Plan, and implementation of risk minimization efforts, specifically among staff working in the field. Item closed.
Date Closed:	26 January 2022

Indicator G4.7 - Document the financial health of the implementing organization(s) to demonstrate that financial resources budgeted will be adequate to implement the project.	MR Section 2.4.6 states that: The financial health of the implementing organisations and of the project itself is presented in detail in the Financial Viability Analysis for the Non-Permanence Risk Analysis and estimating the financial risk score. The two-government agency and NGO project partners all have a multi-year history of operations and provide an underlying financial base that is now being augmented by significant REDD+ revenues from carbon credit sales. Between them the project is in a strong financial position to be able to continue implementation of the project (see annex _Community_ Financial Statements).
Evidence Used to Assess Conformance:	MR Section 2.4.6, financial analysis documents, audited financial statements, Financial Viability Analysis for the Non-Permanence Risk Analysis, site visit interviews
Findings:	The project proponent provided support documents to demonstrate the financial health for the project proponent and provides a description justifying financial stability through involvement of the two government agencies and the NGO project partners. Site visit interviews substantiate the support available to the project through the project partners. The VVB has reviewed the documents provided and concurs that these documents substantiate information discussed during site interviews and concurs that the projected flow of REDD+ funds would likely be adequate in supporting implementation of project activities. Any additional items regarding the Financial Viability Analysis for the Non-Permanence Risk Analysis are addressed by the VCS verification. Item closed.

Date Closed:	26 January 2022
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G5 Legal Status and Property Rights

Indicator G5.1 - Submit a list of all relevant national and local laws and regulations in the host country and all applicable international treaties and agreements. Provide assurance that the project will comply with these and, where relevant, demonstrate how compliance is achieved.	PD Section 3.1.2 identifies the relevant national and local laws and regulations, and applicable international treaties and agreements for which the project was validated as being in compliance. MR Section 2.5.1 identifies these same laws, regulations, treaties, and agreements, as well as additional relevant ones implemented since the validation.
Evidence Used to Assess Conformance:	PD Section 3.1.2, MR Section 2.5.1, field visit site interviews with project partners
Findings:	MR Section 2.5.1 states that the CHRP meets all local, national, and international laws which relate to this project. Field visit site interviews with project partners, which included two National Government agencies, the KWS and KFS, substantiated that the project partners are not aware of any non-compliance with local or national laws or international treaties and agreements. Indicator G5.1 and MR Template Section 2.5.1 require demonstration on how compliance is achieved for relevant national and local laws and regulations in Kenya that have come into effect, changed, or been eliminated since the project's last verification. No additional relevant national or local laws were identified in the MR that were not previously addressed in the last verification. The auditor was unable to locate information in the MR demonstrating how compliance is documented as achieved.
Clarification Request (CL):	Please clarify where in the MR information may be found demonstrating how the conclusion was reached that the CHRP meets all relevant local and national laws and regulations that have come into effect since the last verification, or provide information demonstrating this compliance.
Date Evaluated:	27 September 2021
Project Proponent Response/Actions and Date:	The section 2.5.1 was complemented with the information required. (1 January 2022)
Evidence Used to Close CL:	MR Section 2.5.1 has been updated to provide information to demonstrate how compliance is achieved and monitored for relevant national and local laws and regulations in the host country and applicable international treaties and agreements. Interviews with project partners previously substantiated the information presented in the updated MR. Item closed.
Date issued:	26 January 2022
Indicator G5.2 - Document that the project has approval from the appropriate authorities, including the established formal and/or traditional authorities customarily required by the communities.	This item was closed during the last verification and does not need to be reopened during this verification.

Evidence Used to Assess Conformance:	PD Section 3.1.3; CHRP Monitoring & Implementation Report v3.3 (20 September 2017) Section 3.1.4
Findings:	PD Section 3.1.1 Approval from the Appropriate Authorities, Including Established Formal and/or Traditional Authorities Customarily Required by the Communities. (G5.2) states: To be completed when conservation easements are signed and the Project Proponent has been drafted and agreed upon. This item was closed out by verification of the CHRP Monitoring & Implementation Report v3.3 (20 September 2017) Section 3.1.4, which stated: The Project Proponent of the CHRP is the CHCT. The Trust was established in 2015 by all of the Project Partners. Together, the Project Partners hold legal land tenure over the entirety of the Project Area. The land tenure is described in section 1.2.4. Each Project Partner has assigned the carbon rights to the CHCT.
Date Closed:	27 September 2021

Indicator G5.3 - Demonstrate with documented consultations and agreements that the project will not encroach uninvited on private property, community property, or government property and has obtained the free, prior, and informed consent of those whose rights will be affected by the project.	PD Section 3.2 identifies the land tenure within the project area. MR Section 2.5.2 summarizes the FPIC process.
Evidence Used to Assess Conformance:	PD Section 3.2, MR Section 2.5.2, site visit interviews with project partners and community leaders
Findings:	Site visit interviews with project partners and community leaders substantiate the project is not encroaching uninvited on private property or government property, and that the project obtained the free, prior, and informed consent of the project partners and communities whose rights are affected by the project.
Date Closed:	27 September 2021

Indicator G5.4 - Demonstrate that the project does not require the involuntary relocation of people or of the activities important for the livelihoods and culture of the communities. If any relocation of habitation or activities is undertaken within the terms of an agreement, the project proponents must demonstrate that the agreement was made with the free, prior, and informed consent of those concerned and includes provisions for just and fair compensation.	MR Section 2.5.2 states that the implementation and development of the project did not lead to the involuntary removal or relocation of any stakeholder.
Evidence Used to Assess Conformance:	MR Section 2.5.3, PD Section 1.3.4, site visit interviews with project partners, community leaders, and community members
Findings:	Site visit interviews with project partners community leaders, and community members substantiate the project

	has not required the involuntary relocation of people or of activities important for the livelihoods or culture of the communities. The interviews also substantiate widespread concurrence that activities in the project area have been undertaken with the free, prior, and informed consent of the communities and that substantiate the communities believe they are being justly and fairly compensated for agreeing to participate in the REDD project. The MR does not mention the ongoing land title dispute with Mikulolo Ranching and Directed Agriculture Co Ltd over an area claimed as part of the Chyulu Hills National Park, which is mentioned in PD Sect 1.3.4. Site visit interviews with project partners confirmed that this dispute involves land included as part of the project area, identified that this dispute has yet to be resolved in favor of the Chyulu Hills National Park, and identified the potential for this dispute resolution to require some sort of accommodation with the disputant over the use of the land in question.
Clarification Request (CL):	Please identify in the MR where or if the land title dispute with Mikulolo Ranching and Directed Agriculture Co Ltd is addressed, and whether any such discussion provides assurances that any resolution of this land title dispute will be in compliance with Indicator G5.4.
Date Evaluated:	27 September 2021
Project Proponent Response/Actions and Date:	The section 2.5.3 Property Rights Protection was complemented with the information regarding the Mikulolo Land Dispute in the Chyulu Hills National Park. (1 January 2022)
Evidence Used to Close CL:	MR Section 2.5.3 has been updated to include specific information about the history and status of the Mikulolo land dispute. The MR provides clarification that this dispute is between the KWS and what the KWS believes to be an illegal encroachment onto National Park lands, which are included as part of the project area. Information provided by the project proponent includes a summary for the court ruling that the settlers could not be evicted from lands occupied as of 22 February 2019, but the ruling is also understood to require that the occupiers could not expand their settlement or other activities beyond the 10,000-acre parcel partially settled. Site visit interviews with KWS and project partners substantiate this understanding and also substantiate the intent and efforts by KWS, supported by the Project Proponent, to appeal this court decision based on additional documentation believed to show that this was an illegal encroachment into lands legally gazetted for inclusion in the National Park. The information presented substantiates that the project does not require nor has required the involuntary relocation of property rights holders or of the activities important for their livelihoods as a result of the current status of the Mikulolo land dispute.

	This item is closed, but the VVB intends to issue a Forward Action Request (FAR) for the next verification to ensure the next VVB reviews the status of this dispute to ensure continued compliance with Indicator G5.4
Date Closed:	26 January 2022

Indicator G5.5 - Identify any illegal activities that could affect the project's climate, community or biodiversity impacts (e.g., logging) taking place in the project zone and describe how the project will help to reduce these activities so that project benefits are not derived from illegal activities.	Illegal activities that could affect the project's impacts include poaching for bush meat and elephant/rhino poaching, and cutting down trees for charcoal production or for wood carving or construction materials. It is not possible to derive project benefits from illegal activities under the CCB/VCS programs.
Evidence Used to Assess Conformance:	MR Section 2.5.4, site visit interviews with rangers, project partners, project management staff
Findings:	Illegal activities do not result in project benefits. Site visit observations and interviews substantiate ranger patrols are undertaken to prevent illegal activities from continuing unchallenged and to reduce opportunities for illegal activities to be initiated. Site visit interviews substantiate widespread community belief that illegal activities that could affect the project's impacts have been reduced based on understandings gained through public outreach education about the benefits of the REDD project and based on the various alternative sources of employment or livelihood improvement designed to provide alternatives to the illegal activities. The MR identifies a need for scaling up the intensity of these efforts as additional carbon revenue is available in order to further reduce and stop these illegal activities.
Date Closed:	27 September 2021

Indicator G5.6 - Demonstrate that the project proponents have clear, uncontested title to the carbon rights, or provide legal documentation demonstrating that the project is undertaken on behalf of the carbon owners with their full consent. Where local or national conditions preclude clear title to the carbon rights at the time of validation against the Standards, the project proponents must provide evidence that their ownership of carbon rights is likely to be established before they enter into any transactions concerning the project's carbon assets.	
Evidence Used to Assess Conformance:	
Findings:	This item was demonstrated successfully during validation and does not require re-examination during verification.
Date Closed:	

CM1 Net Positive Community Impacts.

Indicator CM1.1 - Use appropriate methodologies to estimate the impacts on communities, including all constituent socio-economic or cultural groups such as indigenous peoples (defined in G1), resulting from planned project activities. A credible estimate of impacts must include changes in community well-being due to project activities and an evaluation of the impacts by the affected groups. This estimate must be based on clearly defined and defensible assumptions about how project activities will alter social and economic well-being, including potential impacts of changes in natural resources and ecosystem services identified as important by the communities (including water and soil resources), over the duration of the project. The 'with project' scenario must then be compared with the 'without project' scenario of social and economic well-being in the absence of the project (completed in G2). The difference (i.e., the community benefit) must be positive for all community groups.	PD Section 1.3.3 defines the project zone communities as belonging to either the western side or eastern side based on the diversity of social, economic, and cultural characteristics represented on either side of the Chyulu Hills. Within these two overarching communities, the PD further identifies constituent groups.
Evidence Used to Assess Conformance:	PD Sections 1.3.3 and 6.1, MR Sections 4.1.1 and 4.1.2, MR Sections 1.1 and 1.2, site visit observations and site visit interviews with project staff, project partners, and community members
Findings:	Interviews with community stakeholders support the assertions for positive impacts from the project on the three key focal issues identified in the PD and reported on in the MR when comparing the 'with project' scenario to the 'without project' scenario: poverty reduction and livelihood diversification; food security, and improvement of education. Community members interviewed from the Eastern communities and the Western communities agreed that the project strongly supported the communities and interviewees endorsed the continuation of the project. Several interviewees noted that although the ultimate goals have not been reached for these focal issues, the project is making progress on each of the goals. The onsite interviews supported findings that the project has positive impacts benefiting women and men, and positive impacts for the more vulnerable members of the communities. Indicator CM1.1 requires the use of appropriate methodologies to estimate the impacts on communities, including all constituent socio-economic or cultural groups, resulting from planned project activities. The MR does not clearly provide an estimate of impacts for each of the two defined project zone communities, or for the constituent socio-economic or cultural groups within Section 4.1.1.

Clarification Request (CL):	Please clarify where in the MR information may be found describing the positive impacts for each defined community group, or provide information to demonstrate compliance with this aspect of the requirements for Indicator CM1.1. References to figures, tables, and other data within the MR sections referenced as well as throughout the rest of the document should be checked and corrected where appropriate.
Date Evaluated:	28 September 2021
Project Proponent Response/Actions and Date:	Although the Communities in the Chyulu Hills landscape are socially, economically and culturally diverse, the western side represented by the Maasai, and the eastern side represented by an ethnic mix have been impacted with project activities in terms of education, poverty reduction, and creation of alternative income generating activities as demonstrated in Sections 2.2.7, 4.1, 4.3.2 and 4.4 (Table 16). The main activities implemented in both communities were based on poverty and livelihoods, food security and education, however, the indicators reported and results are shown in general for the project. Nevertheless, the households surveys took place on both communities (East and West) (see the key summary results on section 4.3.2) On the other hand, most of the activities implemented for Climate Change Adaptation were developed with the western community, please refer to section 3.3 that highlights some of the activities implemented. (1 January 2022)
Findings:	The explanation provided by the project proponent is helpful in demonstrating how the overall impacts were determined. Supplemental documents and site visit interviews substantiate monitoring for the two community groups defined in the PD. However, the information in the MR was not clarified to present information for each of these two community groups as defined and described in PD Section 1.3.3. Instructions for Indicator CM1.1 in Section 4.1.1 of the Monitoring Report (CCB Version 2, VCS Version 3) include the requirement to: Describe all the impacts on each community group (identified in the validated CCB project description in conformance with G1) resulting from project activities under the with-project scenario. Impacts must include all those identified in the CCB project description and any other unplanned impacts. Explain and justify key assumptions, rationale and methodological choices. Provide all relevant references.
Clarification Request (CL):	Please provide clarification for each of the two defined community groups as appropriate for the information presented in MR Section 4.1.1 in accordance with the requirements for addressing this indicator in the MR Template.
Date Evaluated	26 January 2022
Project Proponent Response/Actions and Date:	Activities developed in the two defined community groups were included in the MR Section 4.1.1 for the focal issues of poverty reduction, food security and education (Table

	15) and in the Community Monitoring Plan Results in section 4.3.2. Household Survey and Activities implemented. (28 February 2022)
Evidence Used to Close CL	The VVB confirmed clarification has been provided in MR Section 4.1.1 for impacts to each of the two defined community groups. Site visit observations and interviews and review of supplemental documentation provided by the Project Proponent substantiated the activities reported for this monitoring period and positive changes in well-being identified within the Western Community and Eastern Community. Item closed.
Date Closed:	2 March 2022

Indicator CM1.2 - Demonstrate that no High Conservation Values identified in G1.8.4-6 will be negatively affected by the project.	PD Section 6.1.2 identifies HCVs under G1.8.4 as forests critical to water catchment and grassland for the prevention of soil erosion, and HCVs under G1.8.5 as areas providing provisioning services such as poles for building material, fodder, fuel, and medicinal plants. No HCVs were identified under G1.8.6.
Evidence Used to Assess Conformance:	PD Section 6.1.2, MR Section 4.1.3, site visit observation and site visit interviews
Findings:	MR Section 4.1.3 describes actions undertaken to prevent negative effects to HCVs identified within the project zone. Site visit observations and site visit interviews substantiate the implementation or initiation of several project activities designed to maintain or enhance these HCVs. Site visit interviews substantiate the general belief within the project zone communities that these HCVs have not been negatively affected by the project. Item closed.
Date Closed:	28 September 2021

CM2 Offsite Stakeholder Impacts

Indicator CM2.1 - Identify any potential negative offsite stakeholder impacts that the project activities are likely to cause.	PD Section 6.2.1 identifies potential negative impacts on offsite stakeholders as the impacts on charcoal traders who illegally extract resources from the protected areas, and the potential heightened risk of impacts from human-wildlife conflict through crop damage, loss of livestock, or personal injury as wildlife numbers increase.
Evidence Used to Assess Conformance:	PD Section 6.2.1, MR Section 4.2.1; site visit observations and site visit interviews
Findings:	MR Section 4.2.1 addresses the potential negative offsite stakeholder impacts that were identified in the PD. Site visit interviews with project staff, project partners, and community members substantiate the project may be likely to result in these negative offsite stakeholder impacts. Item closed.
Date Closed:	28 September 2021

Indicator CM2.2 - Describe how the project plans to mitigate these negative offsite social and economic impacts.	PD Section 6.2.2 identifies plans to mitigate the potential negative impacts on offsite stakeholders. MR Section 4.2.1 identifies the measures undertaken to mitigate negative
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	impacts on offsite stakeholders not involved in illegal activities.
Evidence Used to Assess Conformance:	PD Section 6.2.1, MR Section 4.2.1; site visit observations and site visit interviews
Findings:	Site visit interviews with community leaders and community members substantiate the efforts by the project staff and other project partners to mitigate potential negative impacts caused by human-wildlife conflicts within the project zone, and these same efforts minimize the potential for negative offsite impacts from human-wildlife conflicts. The MR indicates that negative impacts to individuals involved in illegal charcoal activities is expected to be temporary and that legal livelihoods may be preferable to the affected individuals. Site visit interviews with project staff and partners substantiates the project may provide direct or indirect opportunities for legal livelihoods to replace illegal charcoal activities as a livelihood. Item closed.
Date Closed:	28 September 2021

Indicator CM2.3 - Demonstrate that the project is not likely to result in net negative impacts on the well-being of other stakeholder groups.	PD Section 6.2.2 states that the project does not expect any net negative impacts on other stakeholder groups, and further states more concrete conclusions can be drawn once the comprehensive monitoring plan has been implemented and data gathered.
Evidence Used to Assess Conformance:	PD Section 6.2.2, MR Sections 4.2.1 and 4.2.2; site visit observations and site visit interviews
Findings:	Site visit observations and site visit interviews substantiate the project is providing legitimate opportunities for livelihood, and is providing mitigation for impacts from human-wildlife conflicts. The project has been determined not likely to result in net negative impacts on the well-being of other stakeholder groups. In support of the premise that the project is having a net positive impact on well-being, several project staff, project partners, and community members mentioned that based on the project achievements and benefits to date and anticipated to occur with continued REDD funding, other offsite groups and communities have expressed interest in participating in the project. Instructions for Section 4.2.2 of the CCB/VCS Monitoring Report Template require the demonstration that the project activities have not likely resulted in net negative impacts on the well-being of other stakeholders. This demonstration of no net negative impacts is not specifically provided or stated in Section 4.2.2. of the MR, but is suggested in other sections.
Clarification Request (CL):	In Section 4.2.2 please provide information to demonstrate compliance with the requirements for Indicator CM2.3.
Date Evaluated:	28 September 2021
Project Proponent Response/Actions and Date:	Section 4.2.2 was updated with information related to the compliance of the Indicator CM2.3. (1 January 2022)

Evidence Used to Close CL:	MR Section 4.2.2 was updated to provide information to explain how project activities have not likely resulted in net negative impacts on the well-being of other stakeholders. Based on results of site visit interviews and observations, the VVB concurs the information provided adequately demonstrates the project activities have not likely resulted in net negative impacts on the well-being of other stakeholders. Item closed.
Date Closed:	26 January 2022

CM3 Community Impact Monitoring

Indicator CM3.1 - Develop an initial plan for selecting community variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project's community development objectives and to anticipated impacts (positive and negative).	PD Section 8.1.1 identifies 34 indicators to be monitored that are linked to the project's community development objectives. Table 34 in PD Section 8.1.1 lists the 34 indicators, identifies the data collection method and entity responsible for data monitoring, and how frequently the indicator is to be monitored.
Evidence Used to Assess Conformance:	PD Section 8.1.1, M&IR (20 Sept 2017) Section 5.1.3, MR Section 4.3.2, Baseline Household Level Survey Draft Report, quarterly and annual reports from MWCT for the monitoring period
Findings:	PD Section 8.1.1 identifies an initial community monitoring plan involving 34 indicators. MR Section 4.3.2 refers to 41 indicators used in community monitoring. The Monitoring & Implementation Report (M&IR) VCS v3, CCB v2, also states that 41 indicators were used for the previous monitoring survey, and in Sections 5.1.3 and 5.1.4 references the Chyulu Hills Community and Biodiversity Monitoring Plan as a separate document. This Community and Biodiversity Monitoring Plan was not among the support documents provided to the auditor for use for the present verification. The CCB/VCS Monitoring Report Template instructions for Section 4.3.2, which covers CCB Indicators CM3.1, CM3.2, and GL2.5, state the following: <i>Present the results of the community impact monitoring which should include:</i> • All communities, community groups, other stakeholders, and HCVs related to community well-being identified in the monitoring plan. • Community variables selected in the validated project description. • Dates, frequency, sampling methods used, and other information regarding the monitoring process. • Results and evaluation of monitoring. The CCB/VCS Verification Report template instructions require the auditor to describe the steps taken to verify that the community impact monitoring has been carried out in accordance with the project's validated design.

	Community monitoring results provided in the MR do not fully cover or quantify the indicators or support the frequency of monitoring identified for these community indicators presented in the validated PD. The Baseline Household Level Survey Draft Report appears to report on some of the indicators identified by the PD, but does not appear to report on all the indicators or at the frequency identified in the PD. Support documents that were provided for one of the project partners, MWCT, provide documentation for results and frequency of monitoring/reporting identified for some of the indicators included by the PD, but does not cover all the indicators and only covers the portion of the project area/project zone.
Clarification Request (CL):	Please provide a copy of the Chyulu Hills Community and Biodiversity Monitoring Plan. Please clarify where in the MR the specific community monitoring information identified by the PD may be found or provide information to demonstrate compliance with the requirement to carry out community monitoring in accordance with the project's validated design.
Date Evaluated:	29 September 2021
Project Proponent Response/Actions and Date:	A copy of the Chyulu Hills Community and Biodiversity Monitoring Plan was provided, with a list of all indicators measured during the monitoring period, and the results. Please refer to folder Findings\FirstRound\Community_Monitoring Plan\29122021_Community and Biodiversity Monitoring. (1 January 2022)
Findings:	The VVB was provided with the Chyulu Hills Community and Biodiversity Monitoring Plan (October 2016) which supplanted the community monitoring plan presented in the PD. MR Section 4.3.2 presents summaries for the result of the Household Survey conducted in 2020 with comparisons to the Household Survey conducted in 2016. The community monitoring plan presented in Section 8.1.1 of the validated PD identifies the Household Survey as the data collection method to be used to monitor 14 of the 41 variables identified as part of the community monitoring plan. The community monitoring plan also identifies the Household Survey as an annual monitoring requirement. The Chyulu Hills Community and Biodiversity Monitoring Plan (October 2016) identifies data collection methods other than the Household Survey as methods to be used for other community monitoring variables. MR Section 4.3.2 does not identify dates, frequency, sampling methods used, and other information regarding the monitoring process for these additional data collection methods and associated community monitoring indicators. The Project Proponent updated MR Section 2.2.3 to acknowledge that during this monitoring period some indicators included in the Social and Biodiversity Impact

	Assessment were not reported, and presented this as a minor change to the project description.
Clarification Request (CL):	Please provide clarification as appropriate within MR Section 4.3.2 for other community monitoring results for indicators monitored through methods other than the household survey for which results are reported. Please provide clarification within MR Section 4.3.2 for the specific indicators that were not monitored in accordance with methods, frequency, or reporting requirements as identified within the community monitoring plan. Please also provide clarification for discrepancies noted between results presented for community benefits in MR Section 1.2 and the results reported for the same benefits in other sections of the MR. Please ensure that information presented to the VVB for verification is for the reporting period 1 January 2017 through 31 December 2020.
Date Evaluated:	27 January 2022
Project Proponent Response/Actions and Date:	MR Section 4.3.2 was adjusted with other activities implemented in the community monitoring results for indicators monitored through methods other than the household survey for which results are reported. An Annex was included with all the indicators monitored during the period, including methods used to collect data and frequency. A clarification was provided for indicators not measured during the period. (28 February 2022)
Clarification Request (CL):	The VVB confirmed MR Section 4.3.2 now includes community monitoring results for indicators monitored through the methods in addition to monitoring through the household survey. Clarification provided in Annex I clearly identifies which indicators were not monitored in accordance with methods, frequency, or reporting requirements as identified within the community monitoring plan. This change in monitoring regimen was determined by the VVB to constitute a minor change from the PD for this period and addressed by the Project Proponent in MR Section 2.2.3. The VVB noted discrepancies between numerical results presented for some of the community benefits in MR Section 1.2 and the results reported for the same benefits in other sections of the MR, including Tables 15 and 16, and Annex I. Please provide clarification as appropriate to demonstrate how the achievements reported in MR Section 1.2. Provide the numerical response required by the corresponding standard metric, and please provide clarification for inconsistencies in numerical results reported for the same community benefits throughout different sections of the MR including tables, annexes, and narrative descriptions in the text. Please provide appropriate documentation to support the numerical results presented for this specific period. Please ensure that corrections or clarifications provided for

	numbers reported in the MR are updated throughout the MR and any other project documents. Also please provide clarification for why reported achievements during Monitoring Period and Project Lifetime in MR Section 1.2 for “Forest cover” are shown as “Not Applicable” for REDD projects. An opportunity for improvement was also noted to remove duplicated pages that appear to have been included in Annex I.
Date Issued:	2 March 2022
Project Proponent Response/Actions and Date:	Inconsistencies in numerical results reported for the same community benefits throughout different sections of the MR including tables, annexes, and narrative descriptions in the text were adjusted. All appropriate documentation was shared and it is also in Annex I to support the numerical results presented for this specific period. The corrections or clarifications provided for numbers reported in the MR are updated throughout the MR and in the Annex I. As the methodology VM0009 do not accounts for forest cover but for GHG reduction, a clarification note was including in the table The duplicated pages in Annex I were deleted and indicators were updated. (30 March 2022)
Evidence Used to Close CL:	The VVB confirmed that discrepancies have been addressed for reported numerical results for some of the benefits provided during this monitoring period. Numbers reported in MR Section 1.2 are now consistent with information provided in footnotes, other tables, narrative text, and Annex I within the MR. The VVB reviewed the clarification provided regarding how the number of hectares of reduced forest cover for REDD projects was addressed in the MR and found the explanation acceptable. The VVB confirmed clarification was provided in MR Section 1.2. Item closed.
Date Closed:	7 April 2022
Indicator CM3.2 - Develop an initial plan for how they will assess the effectiveness of measures used to maintain or enhance High Conservation Values related to community well-being (G1.8.4-6) present in the project zone.	PD Section 8.1.2 identifies water provisioning and erosion control as the major community-related HCV ecosystem services, and notes these were captured by the monitoring plan presented in PD Section 8.1.1. Monitoring for the associated indicators for these HCVs is identified to be annual or seasonal depending on the indicator.
Evidence Used to Assess Conformance:	PD Sections 6.1.2 and 8.1.2, M&IR Section 5.1.4, MR Section 4.3.2, Baseline Household Level Survey Draft Report, quarterly and annual reports from MWCT for the monitoring period
Findings:	Results of monitoring for HCVs related to community well-being identified in the PD are not presented in MR Section

	4.3.2. The M&IR states that the Chyulu Hills Community and Biodiversity Monitoring Plan is utilized to monitor and assess the effectiveness of maintaining and enhancing community HCVs. The CCB/VCS Monitoring Report Template instructions for Section 4.3.2, which covers CCB Indicators CM3.1, CM3.2, and GL2.5, state the following: <i>Present the results of the community impact monitoring which should include:</i> • All communities, community groups, other stakeholders, and HCVs related to community well-being identified in the monitoring plan. • Community variables selected in the validated project description. • Dates, frequency, sampling methods used, and other information regarding the monitoring process. • Results and evaluation of monitoring. The CCB/VCS Verification Report template instructions require the auditor to describe the steps taken to verify that the community impact monitoring has been carried out in accordance with the project's validated design. Community monitoring results provided in the MR do not fully cover or quantify the community HCV indicators or support the frequency of monitoring identified for these community HCV indicators presented in the validated PD.
Non-conformance Request (NCR):	Please provide documentation to demonstrate that the community HCV indicators identified in the validated PD have been monitored in accordance with the monitoring plan and provide information in the MR to demonstrate compliance with the requirement to carry out community HCV monitoring in accordance with the project's validated design.
Date Evaluated:	29 September 2021
Project Proponent Response/Actions and Date:	Section 4.1.3 was updated and includes the activities implemented to secure the HCV of the project. Additional information is available in sections 2.2.7, 3.3.1 of the MR. For the Community Indicators established in the monitoring plan please refer to folder Findings\FirstRound\Community_Monitoring Plan\29122021_Community and Biodiversity Monitoring. (1 January 2022)
Findings:	The VVB was provided with the Chyulu Hills Community and Biodiversity Monitoring Plan (October 2016) which supplanted the community monitoring plan presented in the PD. The VVB has reviewed the referenced supplemental document along with other documents provided by the Project Proponent as well as the referenced updates in the MR. Although project activities associated with community-related HCVs appear to be discussed in the other referenced sections of the MR, MR Section 4.3.2 requires presentation of the results of the community impact monitoring including HCVs. MR Section 4.3.2 does not

	identify dates, frequency, sampling methods used, results, impacts on each of the two community groups identified in the community monitoring plan, or other information regarding monitoring for the community-related HCVs identified in PD Section 8.1.2.
Clarification Request (CL):	Please provide clarification as appropriate within MR Section 4.3.2 for results from community impact monitoring for the indicators identified by the PD as associated with community-related HCVs.
Date Evaluated:	27 January 2022
Project Proponent Response/Actions and Date:	Section 4.3.2 was updated with results from community and biodiversity impact monitoring associated with Community-related HCVs. Annex I includes the indicators related directly to the community whereas Annex II include the indicators related to Ecosystems Improvement, that results in benefits for the communities. (28 February 2022)
Evidence Used to Close CL:	The VVB confirmed clarification has been provided in MR Section 4.3.2 and Annex I for results from community impact monitoring for the indicators identified by the PD as associated with community-related HCVs. to each of the two defined community groups. Site visit observations and interviews and review of supplemental documentation provided by the Project Proponent substantiated the monitoring and results reported for community-related HCVs this monitoring period. Item closed.
Date Closed:	2 March 2022
Indicator CM3.3 - Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.	PD Section 8.1.3 states that the community monitoring plan and result of monitoring will be made publicly available on the internet and communicated to the communities and other stakeholders. MR Section 4.3.3 summarizes the ways in which the community monitoring plan was made available for public review, and also summarizes the ways in which the community monitoring report has been made available. MR Section 4.3.3 states that the full results of the community monitoring are included in the project MR, which was reported as made available publicly in the Project Area as well as on the CCB website for public review and comment, with hard copies being made available for review at the Project Office and the office of each of the Project Partners, with a Monitoring Report Summary distributed throughout the Project Area in English, Swahili, and Maa.
Evidence Used to Assess Conformance:	PD Section 8.1.3, MR Section 4.3.3, Verra CCB project webpage, site visit observations of community notice boards, site visit interviews
Findings:	The MR is posted on Verra's CCB webpage for this project. The MR contains the results of monitoring reported as undertaken in the MR. See findings for CCB Indicators CM3.1 and CM 3.2 for resolution required for whether

	community monitoring was undertaken and reported in accordance with the community monitoring plan. Site observations and site interviews substantiate the MR has been made available in project partner offices for public review. Site observations noted that at least portions of a MR Summary had been posted on two community information boards, including presentation of some information in Swahili. Site visit interviews substantiate that many of the community members interviewed had either been made aware of the availability of monitoring results or were confident that information would be provided to them by the community representatives from the Project Office. The auditor had determined that community monitoring results have been disseminated in accordance with the initial monitoring plan presented in the PD. The auditor has not been able to determine whether the community monitoring results have been disseminated in accordance with the Chyulu Hills Community and Biodiversity Monitoring Plan, or whether Monitoring Report Summaries were distributed throughout the Project Area in Maa as stated in the MR.
Clarification Request (CL):	Please clarify whether the Chyulu Hills Community and Biodiversity Monitoring Plan presents a different plan for disseminating the community monitoring results than what was presented in the PD. Please provide a copy of the Monitoring Report Summary reported as prepared in Maa and disseminated within the project area and confirm that this summary also contains a summary of the results of the community monitoring.
Date Evaluated:	29 September 2021
Project Proponent Response/Actions and Date:	Due to the relatively complex language used in the summary of the Monitoring Report, it is unlikely that the community that speaks Maa is going to be able to read the document. Most of the community that speaks Maa can't read, so the project does not consider a Summary of the MR translated into Maa, however, the summary of the MR in English and Swahili was disseminated among the community in strategic sites like schools and partners offices and is available for consultation. (1 January 2022)
Evidence Used to Close CL:	The VVB was provided with the Chyulu Hills Community and Biodiversity Monitoring Plan (October 2016) which supplanted the monitoring plan presented in the PD. The Chyulu Hills Community and Biodiversity Monitoring Plan (October 2016) does not present a plan for disseminating monitoring reports that differs from the plan presented in the PD. The MR has been clarified to indicate that the project monitoring report summary, which includes a summary of the community monitoring results, has been made available in English and Swahili. The project proponent has provided clarification on how a summary of the results of monitoring report were disseminated. The VVB

	concludes the results of the monitoring plan were disseminated in accordance with the monitoring plan in the validated PD.
Date Closed:	27 January 2022

B1 Net Positive Biodiversity Impacts

Indicator B1.1 - Use appropriate methodologies to estimate changes in biodiversity as a result of the project in the project zone and in the project lifetime. This estimate must be based on clearly defined and defensible assumptions. The 'with project' scenario should then be compared with the baseline 'without project' biodiversity scenario completed in G2. The difference (i.e., the net biodiversity benefit) must be positive.	PD Sections 4.5.3 and 7.1.1 identify two critical focal issues that were prioritized: ecosystem degradation and biodiversity declines.
Evidence Used to Assess Conformance:	PD Sections 7.1.1 and 4.5.3, MR Sections 5.1.1 and 3.1.3, site visit observations and site visit interviews with project partners and individuals involved in biodiversity monitoring
Findings:	The appropriateness of methodologies used to estimate changes in biodiversity as a result of project was determined during project validation. The verification is required to evaluate the accuracy and appropriateness of monitored data and the justification used to attribute biodiversity changes to the project's activities. Site observations and site interviews substantiate the accuracy of data as described in MR Section 3.1.2 that were collected during monitoring of the permanent plots used for biomass monitoring, assessing disturbance, and regeneration, as well as the appropriateness of these data in assessing changes in vegetation biodiversity. Site observations and site interviews substantiate the accuracy of data that were collected on keystone wildlife species by project partner rangers and scouts. In addition to biodiversity monitoring, MR Section 5.1.1 also identifies project activities undertaken by project partners for ecosystem enhancement and biodiversity improvement. Site observations and site interviews substantiate the positive impacts on biodiversity from the project when compared to baseline without project. Item closed.
Date Closed:	29 September 2021

Indicator B1.2 - Demonstrate that no High Conservation Values identified in G1.8.1-3 will be negatively affected by the project.	PD Section 1.3.6 identifies the HCVs identified for Indicators G1.8.1 through G1.8.3. PD Section 7.1.2 identifies the following measures for demonstrating the HCVs identified in G1.8.1 through G.8.3 will be better with the project compared to the baseline "without project" scenario: protecting habitats, safeguarding water availability, and ensuring landscape connectivity.
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Evidence Used to Assess Conformance:	PD Sections 1.3.6 and 7.1.2, MR Section 5.1.2, site visit observations and site visit interviews
Findings:	Site visit observations and site visit interviews identified no negative effects by the project on the HCVs of concern: endangered and vulnerable plant and animal species, endemic subspecies and races, significant concentrations of a species during any time in their life cycle, viable populations of plants and animals in natural patterns of distribution and abundance, or threatened ecosystems. The overall habitat and wildlife protections and enhancement activities implemented or initiated were determined to be or to likely result in positive effects on the HCVs of concern. Item closed.
Date Closed:	29 September 2021

Indicator B1.3 - Identify all species to be used by the project and show that no known invasive species will be introduced into any area affected by the project and that the population of any invasive species will not increase as a result of the project.	PD Section 7.1.3 states that no non-native species will be used in the Project Accounting Areas and that the Project does not include any planting in the Project Area as a Project Activity and does not intend to initiate any during the crediting period. MR Section 5.1.3 states that no non-native species will be used in the Project Accounting Areas. MR Section 5.1.3 further states that project activities that include any planting or reforestation within the Project Area were implemented with indigenous tree species from the area.
Evidence Used to Assess Conformance:	PD Section 7.1.3, MR Section 5.1.3, site visit observations and site visit interviews
Findings:	Site visit observations and site visit interviews were conducted for representative activities and locations associated with planting activities within the project area and project zone. A grass seedbank project reviewed was substantiated through group interviews to utilize species native to the area, and none of the species utilized is reported as an invasive species. A representative tree planting area reviewed was substantiated through interview with the KWS to utilize species native to the area for the restoration of the degraded area, and none of the species being utilized is reported as an invasive species. A tree nursery site reviewed was substantiated through interview with the KFS to utilize species native or long-established or used in the area, with none considered non-native invasive species. Site visit observations and site visit interviews substantiate that the project-supported beehives used to promote community honey production utilize honey bees, which is not an invasive species. Item closed.
Date Closed:	30 September 2021

Indicator B1.4 - Describe possible adverse effects of non-native species used by the project on the region's environment, including impacts on native species and disease introduction or	PD Section 7.1.4 states that no non-native species will be used in this project.
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facilitation. Project proponents must justify any use of non-native species over native species	
Evidence Used to Assess Conformance:	PD Section 7.1.4, MR Section 5.1.4, site visit observations and site visit interviews
Findings:	Site visit observations and site visit interviews substantiates non-native species are not currently being used or planned to be used in project activities for restoration of degraded areas or other habitat maintenance or enhancement project activities. The site visit interview with KFS and community representatives from the community group's tree nursery that was visited substantiate that non-native species are not reported as used or planned to be used in natural habitat areas, but were the non-native species present at the tree nursery were species long-established and utilized in Kenya and identified for use in gardens and around other habitation areas. No adverse effects were identified from use of non-native species. Item closed.
Date Closed:	30 September 2021

Indicator B1.5 - Guarantee that no GMOs will be used to generate GHG emissions reductions or removals.	PD Section 7.1.5 states that no GMOs will be used to generate GHG reductions or removals. MR Section 5.1.5 states that no GMOs were used in the Project activities to generate GHG reductions or removals.
Evidence Used to Assess Conformance:	PD Section 7.1.5, MR Section 5.1.5, site visit observations and site visit interviews
Findings:	GHG emissions reductions or removals are not proposed using GMOs. Site visit observations and site visit interviews substantiate trees used in restoration of degraded areas and grasses grown in the grass seed banks are derived from locally sourced indigenous species. No source of GMOs was identified that would be used to generate GHG emissions reductions or removals. Item closed.
Date Closed:	30 September 2021

B2 Offsite Biodiversity Impacts

Indicator B2.1 - Identify potential negative offsite biodiversity impacts that the project is likely to cause.	PD Section 7.2.1 identifies three potential negative offsite impacts on biodiversity as being fuel wood collection, subsistence poaching, and commercial poaching. PD Section 7.2.1 further provides reasoning for determining why there would not likely be significant negative impacts outside the Project Zone.
Evidence Used to Assess Conformance:	PD Section 7.2.1, MR Section 5.2.1, site visit observations and site visit interviews with project partners and community members
Findings:	MR Section 5.2.1 identifies reasons used for determining why negative impacts on biodiversity are unlikely outside the Project Zone. Site visit observations and site visit interviews with project partners and community members substantiate the statements made in MR Section 5.2.1 regarding why substantive negative impacts on biodiversity

	are unlikely to be caused by the project outside the Project Zone. No additional potential negative offsite biodiversity impacts were identified during site visit observations or site visit interviews. Item closed.
Date Closed:	30 September 2021

Indicator B2.2 - Document how the project plans to mitigate these negative offsite biodiversity impacts.	PD Section 7.2.2 states that mitigation strategies are non-applicable based on no anticipated negative offsite impacts.
Evidence Used to Assess Conformance:	PD Section 7.2.2, MR Section 5.2.1, site visit observations and site visit interviews with project partners and community members
Findings:	Site visit observations and site visit interviews with project partners and community members substantiate the statements made in MR Section 5.2.1 regarding why substantive negative impacts on biodiversity are unlikely to be caused by the project outside the Project Zone. Although not designed as mitigation for potential negative offsite biodiversity impacts, several of the project livelihood improvement activities undertaken or initiated, particularly in the Eastern Communities, are anticipated to further diminish the potential for negative offsite biodiversity impacts. No actual, substantive, negative offsite biodiversity impacts were identified that could be attributed to the project and would require mitigation. Item closed.
Date Closed:	30 September 2021

Indicator B2.3 - Evaluate likely unmitigated negative offsite biodiversity impacts against the biodiversity benefits of the project within the project boundaries. Justify and demonstrate that the net effect of the project on biodiversity is positive.	PD Section 7.2.3 states that evaluation of unmitigated offsite impacts is not applicable based on no anticipated offsite impacts to biodiversity. MR Section 5.2.2 makes the determination that net benefits for biodiversity from the project are positive based on the positive impacts on biodiversity within the Project Zone and based on the creation of activities and programs that benefit local communities and expected to have controlled and managed possible unmitigated negative offsite biodiversity impacts. MR Section 5.2.2 summarizes several of the key positive impacts to biodiversity within the Project Zone resulting from project activities.
Evidence Used to Assess Conformance:	PD Section 7.2.3, MR Section 5.2.2, site visit observations and site visit interviews
Findings:	Site visit observations and site visit interviews substantiate the positive impacts on biodiversity resulting from the project within the project zone. No actual, substantive, negative offsite biodiversity impacts were identified that could be attributed to the project and would require mitigation. The auditor concurs the net effect of the project on biodiversity is positive.
Date Closed:	30 September 2021

B3 Biodiversity Impact Monitoring

Indicator B3.1 - Develop an initial plan for selecting biodiversity variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project's biodiversity objectives and to anticipated impacts (positive and negative).	PD Section 8.1.4 summarizes the initial plan as well as the indicators selected for use in monitoring biodiversity. The data collection method, responsible entity, and frequency of monitoring is identified in Table 35 of PD Section 8.1.4. MR Section 5.3.2.1 states: Biodiversity monitoring in the Project is based on the Chyulu Hills Community and Biodiversity Monitoring Plan (as described in section 5.1.6 of the PDD). There is no Section 5.1.6 in the Project Description document.
Evidence Used to Assess Conformance:	PD Section 8.1.4, MR Section 5.3.2 including subsections, M&IR Section 5.3.1.2, site visit observations and site visit interviews, review of quarterly and annual reports provided for one project partner (MWCT)
Findings:	PD Section 8.1.4 identifies an initial biodiversity monitoring plan involving 36 indicators, of which 22 are identified as shared in common with the community monitoring plan, with the remaining 14 indicators noted as unique to the biodiversity monitoring plan. MR Section 5.3.2.1 refers to the Chyulu Hills Community and Biodiversity Monitoring Plan as the basis for biodiversity monitoring. This Community and Biodiversity Monitoring Plan was not among the support documents provided to the auditor for use for the present verification. Section 5.3.1.2 of the Monitoring & Implementation Report (M&IR) also references the Chyulu Hills Community and Biodiversity Monitoring Plan and lists 20 biodiversity indicators that were monitored for the 2014-2016 period. These 20 indicators do not completely align with or cover the indicators listed in Section 8.1.4 of the PD. The CCB/VCS Monitoring Report Template instructions for Section 5.3.2, which covers CCB Indicators B3.1 and B3.2, state the following: <i>Present the results of the biodiversity impact monitoring which should include:</i> • All biodiversity variables identified in the monitoring plan, including HCVs. • Dates, frequency, locations, sampling methods used and other information regarding the monitoring process. • Results and evaluation of monitoring. • Effectiveness of measures used to maintain or enhance HCVs. Biodiversity monitoring results provided in the MR do not fully cover or quantify the indicators or support the frequency of monitoring identified for the biodiversity indicators presented in the validated PD. Information on biodiversity monitoring provided in the MR does not cover the full project area. Support documents that were provided for one of the project partners, MWCT, provide documentation for results and frequency of

	monitoring/reporting identified for some of the indicators included by the PD, but does not cover all the indicators and only covers the portion of the project area/project zone. Other data provided for another project partner, KWS, contains extensive data for selected species for portions of the project area as well as additional offsite areas outside the project zone. Although the MR and some support documents, along with site visit observations and interviews, indicates that extensive biodiversity data has been gathered and is gathered, the MR is not clear on whether biodiversity impact monitoring has been carried out in accordance with the project's validated design.
Clarification Request (CL):	Please provide a copy of the Chyulu Hills Community and Biodiversity Monitoring Plan. Please clarify where in the MR the specific biodiversity monitoring information identified by the PD may be found or provide information to demonstrate compliance with the requirement to carry out biodiversity monitoring in accordance with the project's validated design. Please clarify data applicable to the project area or project zone, separate from data applicable to a larger landscape beyond the scope of the project biodiversity monitoring plan. References to figures, tables, and other data within the MR sections referenced as well as throughout the rest of the document should be checked and corrected where appropriate.
Date Evaluated:	30 September 2021
Project Proponent Response/Actions and Date:	A copy of the Community and Biodiversity Monitoring Plan was shared (Please refer to folder Findings\FirstRound\Community_Monitoring Plan\29122021_Community and Biodiversity Monitoring) where it is possible to find the results for the established biodiversity indicators of this MR period. (1 January 2022)
Findings:	The VVB was provided with the Chyulu Hills Community and Biodiversity Monitoring Plan (October 2016) which supplanted the monitoring plan presented in the PD. Supplemental information provided to the VVB describes the results of monitoring for biodiversity indicators. MR Section 5.3.2 presents summaries for result of biodiversity monitoring reported by the project proponent, which includes many of the indicators identified for monitoring in the biodiversity monitoring plan. MR Section 5.3.2 does not provide results for each of the biodiversity indicators identified by the biodiversity monitoring plan. Monitoring results presented in MR Section 5.3.2 do not appear to cover the entire project area for each of the indicators that are reported. The Project Proponent updated MR Section 2.2.3 to acknowledge that during this monitoring period some indicators included in the Social and Biodiversity Impact

	Assessment were not reported, and presented this as a minor change to the project description.
Clarification Request (CL):	Please provide clarification as appropriate within MR Section 5.3.2 for other biodiversity monitoring results for each of the biodiversity indicators monitored. Please provide clarification within MR Section 5.3.2 for indicators not monitored in accordance with methods, frequency, or reporting requirements as identified within the community monitoring plan. Please provide clarification as appropriate for biodiversity indicators for which monitoring results are not reported for the entire project area.
Date Evaluated:	27 January 2022
Project Proponent Response/Actions and Date:	MR section 5.3.2 was updated with the Annex II that includes all the monitoring results for each indicator established. Clarification of the indicators not measured during the monitoring period was provided in the Annex II. (28 February 2022)
Evidence Used to Close CL:	The VVB confirmed MR Section 5.3.2 now includes clarification for biodiversity monitoring results for indicators monitored. Clarification provided in Annex II clearly identifies which indicators were not monitored in accordance with methods, frequency, or reporting requirements as identified within the community monitoring plan. This change in monitoring regimen was determined by the VVB to constitute a minor change from the PD for this period and was addressed by the Project Proponent in MR Section 2.2.3. Review of support document provided, site visit observations, and interviews with project staff, rangers, and community members substantiates biodiversity monitoring was conducted during this period in general accordance with the monitoring plan as reported in the MR. Item closed.
Date Closed:	2 March 2022
Indicator B3.2 - Develop an initial plan for assessing the effectiveness of measures used to maintain or enhance High Conservation Values related to globally, regionally or nationally significant biodiversity (G1.8.1-3) present in the project zone.	PD Section 8.1.5 states: <i>Biodiversity HCVs, such as critically endangered species, key threatened ecosystems and ecosystem services, biome, corridor function are captured in the Monitoring Plan above.</i> ["above" is reference to PD Section 8.1.4]
Evidence Used to Assess Conformance:	PD Section 8.1.5, PD Section 1.3.6 including subsections, M&IR Section 5.3.1.2, MR Section 5.3.2, site visit observations and site visit interviews, review of quarterly and annual reports provided for one project partner (MWCT)
Findings:	PD Section 8.1.5 states that the monitoring plan presented in PD Section 8.1.4 captures the initial plan for assessing the effectiveness of measures to maintain or enhance biodiversity. The monitoring plan presented in PD Section 8.1.4 does not clearly present a plan identifying how the

	specific biodiversity HCVs identified in PD Sections 1.3.6.1 through 1.3.6.7 are to monitored. Section 5.3.1.2 of the Monitoring & Implementation Report (M&IR) also references the Chyulu Hills Community and Biodiversity Monitoring Plan and lists 20 biodiversity indicators that were monitored for the 2014-2016 period. These 20 indicators do not completely align with or cover the indicators listed in Section 8.1.4 of the PD. The CCB/VCS Monitoring Report Template instructions for Section 5.3.2, which covers CCB Indicators B3.1 and B3.2, state the following: <i>Present the results of the biodiversity impact monitoring which should include:</i> • <i>All biodiversity variables identified in the monitoring plan, including HCVs.</i> • <i>Dates, frequency, locations, sampling methods used and other information regarding the monitoring process.</i> • <i>Results and evaluation of monitoring.</i> • <i>Effectiveness of measures used to maintain or enhance HCVs.</i> Biodiversity monitoring results provided in the MR do not fully cover or quantify the indicators or support the frequency of monitoring identified for the biodiversity indicators presented in the validated PD that appear to apply to biodiversity HCVs. Information that is presented in the MR for biodiversity HCVs does not cover the full project area. Support documents that were provided for one of the project partners, MWCT, provide documentation for results and frequency of monitoring/reporting identified for some of the indicators included by the PD that apply to biodiversity HCVs, but does not cover all the indicators and only covers the portion of the project area/project zone. Other data provided for another project partner, KWS, contains extensive data for selected HCV species for portions of the project area as well as additional offsite areas outside the project zone. Although the MR and some support documents, along with site visit observations and interviews, indicates that extensive HCV biodiversity data has been gathered and is gathered, the MR is not clear on whether HCV biodiversity impact monitoring has been carried out in accordance with the project's validated design.
Clarification Request (CL):	Please provide a copy of the Chyulu Hills Community and Biodiversity Monitoring Plan. Please clarify where in the MR the specific HCV biodiversity monitoring information identified by the PD may be found or provide information to demonstrate compliance with the requirement to carry out biodiversity monitoring in accordance with the project's validated design. Please clarify HCV biodiversity

	monitoring data applicable to the project area or project zone, separate from data applicable to a larger landscape beyond the scope of the project HCV biodiversity monitoring plan.
Date Evaluated:	30 September 2021
Project Proponent Response/Actions and Date:	A copy of the Community and Biodiversity Monitoring Plan was shared (Please refer to folder Findings\FirstRound\Community_Monitoring Plan\29122021_Community and Biodiversity Monitoring). Information of the Biodiversity HCV could be found in Section 5.1.2 and Sections 5.3.2.2, 5.3.2.3, 5.3.2.4 with relevant information of presence, abundance and diversity of wildlife in the project area, and wildlife distribution and movements between National Parks and project area as stated in the Monitoring plan. Information regarding Key species like Black Rhino and Elephants contains data that may be out of the project area or project zone, however, that is one of the importances of the Chyulu Hills Landscapes, that it is an important corridor for several species.
Evidence Used to Close CL:	The VVB was provided with the Chyulu Hills Community and Biodiversity Monitoring Plan (October 2016) which supplanted the monitoring plan presented in the PD. The biodiversity monitoring plan identifies two indicators associated with monitoring HCV species: BIA38) presence, abundance and diversity of wildlife in the Project Area; and BIA39) wildlife distribution & evidence of movement between National Parks and Project ranches. Biodiversity monitoring results presented in MR Section 5.3.2 present results for HCV species. Site visit observations and interviews with project partners undertaking HCV species monitoring substantiate efforts reported in the MR. Item closed.
Date Closed:	27 January 2022
Indicator B3.3 - Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.	MR Section 5.3.3 states that the full results of the biodiversity monitoring are included in the project MR, which was reported as made available publicly in the Project Area as well as on the CCB website for public review and comment, with hard copies being made available for review at the Project Office and the office of each of the Project Partners, with a Monitoring Report Summary distributed throughout the Project Area in English, Swahili, and Maa. MR Section 5.3.3 also states that the Biodiversity Monitoring Plan has been available for public review since the previous monitoring period at the Project Office and at the office of each of the Project Partners.
Evidence Used to Assess Conformance:	MR Section 5.3.3
Findings:	The PD does not appear to provide a commitment to developing a biodiversity monitoring plan apart from that presented in PD Section 8.1.4, or provide a plan for disseminating the results of biodiversity monitoring separately from the full monitoring report. However,

	biodiversity monitoring plans are referenced in various sections of the MR in conjunction with a Chyulu Hills Community and Biodiversity Monitoring Plan that may have been prepared subsequent to the PD. Dissemination of the full MR results, and appropriate language summaries, in accordance with the plan in the PD would then be understood to satisfy the requirement for dissemination of the biodiversity monitoring plan unless a change in dissemination was presented in the Biodiversity Monitoring Plan.
Clarification Request (CL):	Please clarify whether the Chyulu Hills Community and Biodiversity Monitoring Plan presents a different plan for disseminating the biodiversity monitoring results than what was presented in the PD. Please provide a copy of the Monitoring Report Summary reported as prepared in Maa and disseminated within the project area and confirm that this summary also contains a summary of the results of the biodiversity monitoring.
Date Evaluated:	30 September 2021
Project Proponent Response/Actions and Date:	Due to the relatively complex language used in the summary of the Monitoring Report, it is unlikely that the community that speaks Maa is going to be able to read the document. Most of the community that speaks Maa can't read, so the project does not considered a Summary of the MR translated into Maa, however, the summary of the MR in English and Swahili was disseminated among the community in strategic sites like schools and partners offices and is available for consultation.
Evidence Used to Close CL:	The VVB was provided with the Chyulu Hills Community and Biodiversity Monitoring Plan (October 2016) which supplanted the monitoring plan presented in the PD. The Chyulu Hills Community and Biodiversity Monitoring Plan (October 2016) does not present a plan for disseminating monitoring reports that differs from the plan presented in the PD. The MR has been clarified to indicate that the project monitoring report summary, which includes a summary of the community monitoring results, has been made available in English and Swahili. The project proponent has provided clarification on how a summary of the results of monitoring report were disseminated. The VVB concludes the results of the monitoring plan were disseminated in accordance with the monitoring plan in the validated PD. Item closed.
Date Closed:	27 January 2022

Gold Level Section

GL1 Climate Change Adaptation Benefits

Indicator GL1.1 - Identify likely regional climate change and climate variability scenarios and impacts, using available	PD Section 5.7.1 describes likely regional climate change and climate variability scenarios and impacts, and potential
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studies, and identify potential changes in the local land-use scenario due to these climate change scenarios in the absence of the project.	changes in the local land-use from these scenarios in the absence of the project.
Evidence Used to Assess Conformance:	PD Section 5.7.1
Findings:	This indicator was successfully closed during project validation and does not need to be reopened. Item closed.
Date Closed:	1 October 2021

Indicator GL1.2 - Identify any risks to the project's climate, community and biodiversity benefits resulting from likely climate change and climate variability impacts and explain how these risks will be mitigated.	PD Section 5.7.2 identifies increased temperatures and risk of drought and low capacity of local population to adapt to more extreme weather patterns as risks to the project's climate, community, and biodiversity benefits and describes how these risks will be mitigated.
Evidence Used to Assess Conformance:	PD Section 5.7.2
Findings:	This indicator was successfully closed during project validation and does not need to be reopened. Item closed.
Date Closed:	1 October 2021

Indicator GL1.3 - Demonstrate that current or anticipated climate changes are having or are likely to have an impact on the well-being of communities <i>and/or</i> the conservation status of biodiversity in the project zone and surrounding regions.	PD Section 5.7.3 provides information to demonstrate that current or anticipated climate changes are having or are likely to have an impact on the well-being of communities <i>and/or</i> biodiversity in the project zone.
Evidence Used to Assess Conformance:	PD Section 5.7.3
Findings:	This indicator was successfully closed during project validation and does not need to be reopened. Item closed.
Date Closed:	1 October 2021

Indicator GL1.4 - Demonstrate that the project activities will assist communities ⁵³ <i>and/or</i> biodiversity to adapt to the probable impacts of climate change.	PD Section 5.7.4 identifies four climate change risks and presents the potential effects and potential mitigative/adaptive strategies. The risks identified are: 1) more intense and longer droughts; 2) seasonal rivers drying out; 3) low capacity of local populations to adapt to frequent natural disasters; and 4) decreased biodiversity, loss of forest cover to drought, temperature change.
Evidence Used to Assess Conformance:	PD Section 5.7.4, MR Section 3.3.1, site visit observations and site visit interviews
Findings:	MR Section 3.3.1 describes activities <i>and/or</i> processes implemented to assist communities <i>and/or</i> biodiversity to adapt to the probable impacts of climate change. Site visit observations and site visit interviews with project staff, project partners, community leaders, and community members substantiate that progress is being made through implementation or initiation of many of the potential mitigative/adaptive strategies identified in the validated PD to assist communities and biodiversity adapt to the probable impacts of climate change. Item closed.
Date Closed:	1 October 2021

GL2 Exceptional Community Benefits

Indicator GL2.1 - Demonstrate that the project zone is in a low human development country OR in an administrative area of a medium or high human development country in which at least 50% of the population of that area is below the national poverty line.	PD Section 6.3.1 provides information summarizing how this requirement is met by the project.
Evidence Used to Assess Conformance:	PD Section 6.3.1
Findings:	This indicator was successfully closed during project validation and does not need to be reopened. Item closed.
Date Closed:	1 October 2021

Indicator GL2.2 - Demonstrate that at least 50% of households within the lowest category of well-being (e.g., poorest quartile) of the community are likely to benefit substantially from the project.	PD Section 6.3.2 provides information summarizing how this requirement is met by the project.
Evidence Used to Assess Conformance:	PD Section 6.3.2
Findings:	This indicator was successfully closed during project validation and does not need to be reopened. Item closed.
Date Closed:	1 October 2021

Indicator GL2.3 - Demonstrate that any barriers or risks that might prevent benefits going to poorer households have been identified and addressed in order to increase the probable flow of benefits to poorer households.	PD Section 6.3.3 provides information summarizing potential barriers or risks that were identified that could prevent benefits from reaching the poorer households: elite capture, fewer chances of formal employment, and no representation in decision-making processes. PD Section 6.3.3 also provides measures that were identified to address these potential barriers or risks.
Evidence Used to Assess Conformance:	PD Section 6.3.3, MR Section 4.4.1, site visit observations and site visit interviews with project staff, project partners, and community members
Findings:	Site visit observations and interviews substantiate project management staff have implemented controls that ensure project funds are used as intended, and that project employment opportunities do not exclude community members from poorer households. Site visit observations and interviews substantiate the transparency of project activity funding which alleviates concerns that project benefits could only be going to an elite few. Interviews with project staff, project partners from the Group Ranches, and community members substantiate that livelihood programs supported by the project are targeted to poorer households and that education bursaries and scholarships factor in need as well as merit. Site visit interviews substantiate opportunities for community members from poorer households to provide input and participate in the decision-making process for what project benefits are prioritized within their respective community.

	Item closed.
Date Closed:	1 October 2021

Indicator GL2.4 - Demonstrate that measures have been taken to identify any poorer and more vulnerable households and individuals whose well-being or poverty may be negatively affected by the project, and that the project design includes measures to avoid any such impacts. Where negative impacts are unavoidable, demonstrate that they will be effectively mitigated.	PD Section 6.3.4 provides information summarizing the identification of poor households and women as the two vulnerable groups for which many the project activities are focused.
Evidence Used to Assess Conformance:	PD Section 6.3.4, MR Section 4.4.2, site visit observations and site visit interviews with project staff, project partners, and community members
Findings:	Site visit observations and site visit interviews with project staff, project partners, and community members in the project zone substantiate the implementation or initiation of project activities identified in the MR for avoiding negative impacts to these groups and that would mitigate potential negative impacts. School bursaries and scholarships have been demonstrated as taking into account gender to promote girls' enrollment in schools as well as taking into account household need. Site observations and interviews substantiate the project sponsorship or support of women's groups established for improving the livelihood opportunities for women, and substantiate the project sponsorship or support of other community groups for livelihood improvement opportunities. Site visit observations and interviews substantiate the project has contributed to improvements for healthcare opportunities that benefit poorer community members and women's health in the project area. Item closed.
Date Closed:	1 October 2021

Indicator GL2.5 - Demonstrate that community impact monitoring will be able to identify positive and negative impacts on poorer and more vulnerable groups. The social impact monitoring must take a differentiated approach that can identify positive and negative impacts on poorer households and individuals and other disadvantaged groups, including women.	PD Section 6.3.5 provides information on women's involvement in various advisory committees to provide input on project design.
Evidence Used to Assess Conformance:	PD Section 6.3.5, PD Section 8.1.1, MR Section 4.3.2, Baseline Household Level Survey Draft Report and spreadsheet of survey data
Findings:	The household surveys conducted for the social impact analysis during the monitoring period includes questions to identify household income as well as a series of questions designed to identify positive and negative impacts. The draft household level survey report provides summaries of the results of the monitoring that demonstrate the approach

	taken could differentiate impacts on poorer households, individuals, and women. The spreadsheet of household survey data results provided to the auditor clearly demonstrates the differentiation of impacts within the assessment. Instructions for Section 4.3.2 of the CCB/VCS Monitoring Report Template state: <i>For projects validated to the Gold Level for exceptional community benefits, include all monitoring results demonstrating the positive and negative impacts on poorer households and individuals and other disadvantaged groups, including women, and demonstrate that community monitoring effectively identified positive and negative impacts on these individuals, households and groups.</i> MR Section 4.3.2 does not include monitoring results that demonstrate the positive and negative impacts specifically for poorer households and individuals and other disadvantaged groups, including women, or demonstrate that community monitoring effectively identified positive and negative impacts on these individuals, households, and groups.
Non-conformance Request (NCR):	Please provide information to demonstrate compliance with all instructions for reporting required in MR Section 4.3.2.
Date Issued:	1 October 2021
Project proponent response/actions	The community gold level information was included in the MR Sections 4.3.2 and 4.4 Optional criterion: Exceptional Community Benefits demonstrating the positive impacts in women and communities in general. Please refer also to the Community and Biodiversity Monitoring plan.
Findings:	The VVB reviewed the updates to MR Section 4.3.2 and additional support documents provided by the Project Proponent. The VVB acknowledges the MR update provides a summary for beneficial impacts on women for some of the indicators monitored, and provides an overview for positive impacts on communities in general. However, requirements for Gold Level reporting within instructions for Section 4.3.2 of the CCB/VCS Monitoring Report Template are: For projects validated to the Gold Level for exceptional community benefits, include all monitoring results demonstrating the positive and negative impacts on poorer households and individuals and other disadvantaged groups, including women, and demonstrate that community monitoring effectively identified positive and negative impacts on these individuals, households and groups. As noted in findings for Indicator CM3.1, MR Section 4.3.2 does not present monitoring results for all indicators identified by the community monitoring plan. MR Section 4.3.2 does not provide all monitoring results demonstrating the positive and negative impacts on poorer households

	and individuals and other disadvantaged groups, including women, and demonstrate that community monitoring effectively identified positive and negative impacts on these individuals, households and groups.
Non-conformance Request (NCR):	Please provide all monitoring results as appropriate to demonstrate the positive and negative impacts on poorer households and individuals and other disadvantaged groups, including women, and demonstrate that community monitoring effectively identified positive and negative impacts on these individuals, households and groups.
Date Issued:	27 January 2022
Project proponent response/actions	Annex I incorporate the impacts on poorer households and individuals and other disadvantaged groups for all the Community indicators. (28 February 2022)
Evidence Used to Close NCR:	The VVB confirmed monitoring results have been included to demonstrate the positive and negative impacts on poorer households and individuals and other disadvantaged groups, including women. Clarification provided in Annex I clearly identifies which indicators were not monitored in accordance with methods, frequency, or reporting requirements as identified within the community monitoring plan. The VVB reviewed the information provided, and based on review of supporting documentation, site visit observations, and interviews with project staff and community members determined that the indicators not monitored during this period would not likely have resulted in identification of unaddressed negative impacts or result in substantive changes to the overall positive community impacts reported for poorer and more vulnerable groups. This change in monitoring regimen was determined by the VVB to constitute a minor change from the PD for this period and addressed by the Project Proponent in MR Section 2.2.3. Based on review of documentation provided by the Project Proponent, site visit observations, and interviews with project partners, project staff, community leaders, and community members, the VVB concludes that community impact monitoring during this period was able to effectively identify and report on positive and negative impacts on poorer and more vulnerable groups. Item closed.
Date Closed:	2 March 2022

GL3 Exceptional Biodiversity Benefits

Project proponents must demonstrate that the project zone includes a site of high biodiversity conservation priority by meeting either the vulnerability or irreplaceability criteria defined below:

Indicator GL3.1 – Vulnerability Regular occurrence of a globally threatened species (according to the IUCN Red List) at the site:	PD Section 7.3.1 identifies the IUCN-listed species within various threat categories that had been identified for the project area.
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1.1 - Critically Endangered (CR) and Endangered (EN) species - presence of at least a single individual; or	
1.2 - Vulnerable species (VU) - presence of at least 30 individuals or 10 pairs.	
Evidence Used to Assess Conformance:	PD Section 7.3.1, MR Section 5.3.2, site visit observations of wildlife data tracking and management systems and demonstrations for project partners, site visit interviews
Findings:	Demonstration of Exceptional Biodiversity Benefits requires demonstration that either Indicator GL3.1 or Indicator GL3.2 is met. Summary information provided in the MR states that eight Black Rhinos, a Critically Endangered species, have been documented as present within the project area. Information on this species is sensitive and not released publicly. During the site visit, Big Life Foundation provided the auditor an overview of how observations are made and tracked, provided a demonstration of the software used to monitor Black Rhinos, and presented photographic documentation that clearly demonstrated the presence of several uniquely identifiable Black Rhinos documented in the project area. Sufficient documentation was provided to demonstrate that criterion 1.1 continued to be met during the monitoring period, based on the documented presence of at least a single individual of a Critically Endangered Species. While in the project area, the auditor also observed and photographed a Rüppell's Vulture, one of the Endangered species listed by the PD as present in the project area. Item closed.
Date Closed:	1 October 2021

OR

Indicator GL3.2 – Irreplaceability A minimum proportion of a species' global population present at the site at any stage of the species' lifecycle according to the following thresholds: 2.1 - Restricted-range species - species with a global range less than 50,000 km² and 5% of global population at the site; or 2.2 - Species with large but clumped distributions - 5% of the global population at the site; or 2.3 - Globally significant congregations - 1% of the global population seasonally at the site; or	
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2.4 - Globally significant source populations - 1% of the global population at the site.	
Evidence Used to Assess Conformance:	
Findings:	Not required. Demonstration of Exceptional Biodiversity Benefits requires demonstration that either Indicator GL3.1 or Indicator GL3.2 is met. Indicator GL3.1 has been successfully demonstrated as met, so demonstration of Indicator GL3.2 is not required.
Date Closed:	n/a