



NORTHERN KENYA GRASSLAND CARBON PROJECT VCS+CCB VERIFICATION REPORT



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Summary

The Northern Kenya Grassland Carbon Project (herein after referred to as “the project” or NKCP) comprises Agricultural Land Management (ALM) project activities under the Verified Carbon Standard (VCS) sectoral scope of Agriculture, Forestry and Other Land-Use (AFOLU). The project encompasses over 2.15 million hectares (>5.3 million acres) of community settlements in 14 conservancies located within a large portion of northern Kenya savannas and grasslands. Through adherence to VCS Methodology VM0032 (version 1.0); Climate, Community & Biodiversity Standards (CCB) (Third Edition, June 2017); and the validated Project Description (PD) dated 28 April 2020, the project has reduced and removed greenhouse gases from the atmosphere by implementing sustainable grassland management and engaging and benefitting various community members within and affected by the project.

The project demonstrated adherence and validation to VCS Methodology VM0032 v1.0 and to Climate, Community & Biodiversity Standards (Third Edition) on 28 April 2020.

The VCS verification purpose assessed compliance with the VCS Version 4 Program Guide, Standard, adherence to the approved VM0032 Methodology, all associated updates, the validated Project Description 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 CCBA 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 (Third 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.

The criteria followed the verification guidance documents provided by VCS located at <https://verra.org>. Unless otherwise indicated, the assessment was performed against the most recent version of the relevant VCS guidance documents as of October 2020.

During this verification, seven (7) VCS findings were raised. A summary of all VCS findings is included in Appendix A. Please see the separate validation report which includes of all CCB findings.

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 large project size was 1%. Following VCS approved methodology VM0032, total project uncertainty amounted to 6.11% for the monitoring period. All findings were satisfied to a *reasonable* level of assurance. Please see Section 2.6.1 where several Forward Action Requests (FARs) were raised for the benefit of future verifications.

After completion of a site inspection and review of all project information, procedures, calculations, and supporting documentation, Aster Global Environmental Solutions, Inc., confirms the Northern Kenya Grassland Project is accurate, consistent, and complies with all aforementioned VCS Version 4 criteria, CCB Third Edition criteria, the selected methodology (VM0032), and the validated PD. Aster Global confirms the *Northern Kenya Grassland Carbon Project Monitoring Report v 3.9*, dated 02 October 2020, has been implemented in accordance with VCS Version 4 and CCB Third Edition criteria.

Aster Global confirms all verification activities – including objectives, scope and criteria, level of assurance, and Project Description implementation adherence to VCS Version 4 (and all associated updates) and CCB Standards (Third Edition), as documented in this report – are complete. Aster Global concludes without any qualifications or limiting conditions *Northern Kenya Grassland Carbon Project Monitoring Report v 3.9, dated 02 October 2020*, meets the requirements of VCS Version 4 (and all associated updates), CCB Standards (Third Edition), and the validated PD. In addition, Aster Global asserts the project complies with the criteria for projects set out in the Third Edition of the CCB Standards to achieve Gold Level distinction for the optional Climate Change Adaptation, Exceptional Community, and Exceptional Biodiversity Benefits.

The GHG assertion provided by Northern Rangelands Trust and verified by Aster Global has resulted in the GHG emissions reduction or removal of 3,822,118 tCO₂ equivalents by the project during the verification period/reporting period (01 January 2013 – 31 December 2016; 4 years). This value is gross of the 16% (611,539 tCO₂ equivalents) buffer withholding based on the non-permanence risk assessment tool. This results in 3,210,579 tCO₂ equivalents of credits eligible for issuance as VCUs.

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1 INTRODUCTION

1.1 Objective

For this project, the verification objective was to ensure implementation of project activities and project compliance with the VCS Version 4 Program Guide and Standard, CCB Standards (Third Edition), selected methodology (VM0032), all associated updates, and the validated VCS Project Description (PD). Aster Global assessed the GHG emission removals for the AFOLU project, specifically ALM activities.

1.2 Scope and Criteria

The scope of the verification¹ included 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; and time periods covered. The geographic scope is defined by the project boundary, the carbon reservoir types, management activities, contract periods, and related. The scope of the GHG project was outlined by the Project Proponent within the validated Project Description (28 April 2020) and the Monitoring Report (v3.9) dated 02 October 2020 and is re-defined as follows:

Baseline Scenario	Continuous grazing, whereby animals repeatedly graze the same site in small loose groups. Animals are moved seasonally but are more likely to graze near water.
Activities/Technologies/Processes	Adoption of sustainable grassland management through adjustment of fire and grazing regimes and by increasing community and biodiversity benefits.
Sources/Sinks/Reservoirs	<u>Carbon Pool:</u> Soil organic carbon (SOC) <u>GHG Sources:</u> Grazing animals (CH ₄)
GHG Type	CO ₂ , CH ₄ .
Time Period (start date, crediting period)	Start Date: 10 December 2012 Crediting Period: 30 years, from 1 January 2013 to 31 December 2042 Reporting/Verification Period: 01 January 2013 – 31 December 2016
Project Boundary	- Northern Rangeland Trust (NRT) – umbrella organization for 14 conservancies - Approximately 2.15-million-hectare project area - Community settlements throughout project area (<500 people) - Kenyan savanna grasslands extending northward from the northern slopes of Mt. Kenya

In addition, the scope of this Monitoring Report verification comprised the evaluation of the design of the project against each of the CCB Standards' criteria, and an evaluation of the project's delivery of the net benefits in accordance with the validated design and monitoring plan. Aster's verification included a detailed review of all the criteria and associated indicators, on-site visit, interviews with

¹ Section 4.3.4 of ISO 14064-3:2006

Project Proponents and stakeholders, review of supporting documentation, records and reports, etc.

The criteria followed the validation guidance documents provided by VCS and CCB located at <https://verra.org>. Unless otherwise indicated, the assessment was performed against the most recent version of the relevant guidance document. These documents include the following:

- *VCS Program Guide (v4, 19 September 2019)*
- *VCS Standard (v4, 09 March 2020)²*
- *Program Definitions (v4, 19 September 2019)*
- *AFOLU Non-Permanence Risk Tool (v4, 19 September 2019)*
- *VCS Validation and Verification Manual (v3.2, 19 October 2016)*
- *VM0032 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing (v1.0, 16 July 2015)*
- *Climate, Community & Biodiversity Standards, v3.1 (21 June 2017; Third Edition updates)*
- *CCB Program Rules, v3.1 (21 June 2017)*
- *CCB Program Definitions; v3.0 (21 June 2017)*
- *Guidance for the Use of the CCB Standards, May 2014*
- *Validated Project Description (28 April 2020)*

1.3 Level of Assurance

The level of assurance was used to determine the depth of detail the Verification Team placed in the Validation/Verification and Sampling Plan to determine if there were 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 and CCB Programs. 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 Northern Kenya Grassland Carbon Project comprises Agricultural Land Management (ALM) project activities under the Verified Carbon Standard (VCS) sectoral scope of Agriculture, Forestry and Other Land-Use (AFOLU). The project encompasses over 2.15 million hectares (>5.3 million acres) of community settlements in 14 conservancies located within a large portion of northern Kenya savannas and grasslands. Through adherence to VCS Methodology VM0032 (version 1.0) and Climate, Community & Biodiversity Standards (Third Edition, June 2017), the project has reduced and removed greenhouse gases from the atmosphere by implementing sustainable grassland management and engaging and benefitting various community members within and affected by the project.

These activities will continue to be accomplished by actively planned grazing and livestock movements, as opposed to overgrazing in the baseline scenario. This has facilitated recovery of

² During the course of the Validation/Verification, VCS Version 4 was released on 19 September 2019. The VCS Standard section references in the review findings appendix may reflect older VCS Standard versions. However, the Verification Team assessed and confirmed the Project's adherence to VCS V4 Program updates.

perennial grasses, leading to reduction and removal of millions tCO₂ equivalents (CO₂e) of greenhouse gases from the atmosphere over the life of the project.

Cash payments for carbon credits have been issued to communities. These funds are being used for improved healthcare, education, and infrastructure. Additionally, grass banks resulting from improved rotational grazing are protecting livestock during extreme weather events, improving the health of saleable livestock, and providing more sustainable meat and dairy production during the dry season. Community dynamics, interactions, and agreement of the project's benefits have already resulted in improved physical, financial and social capital.

The improved ecology and soil quality of the project area has resulted in increased High Conservation Areas for endangered animal species. The project activities have led to improved species diversity for many insect, bird and plant species, having a ripple effect on biodiversity in the project area.

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 a Soil Scientist, Certified Foresters, Registered Professional Foresters, The Wildlife Society Biologists, M.S. Forest Biometricians, Remote Sensing/GIS Specialists, and VCS-approved AFOLU Experts in ALM, REDD, and WRC categories. Aster Global's own Project Specialist (e.g., a licensed/trained soil scientist) was onsite conducting the field verification activities, and subcontractors included on the audit team were employed for translation services (as applicable). Aster Global completes all calculation/modeling review in-house with our team of a soil scientist, statisticians, forest biometricians, and GIS/remote sensing specialists. Aster Global has been involved in 69 VCS verifications and 37 CCB verifications, including a large number of methodology assessments. Aster Global has a specialist on staff with nine years of CCB experience who handles all CCB components for project review. All Aster Global staff involved in the verification audit have ecological, biodiversity, natural resource and forestry backgrounds to fulfill these requirements.

2.2 Method and Criteria

The verification assessed the project's compliance with VCS Version 4, CCB Third Edition, all associated updates, the selected methodology (VM0032), and the validated Project Description (PD) dated 28 April 2020. The Verification Team assessed the Greenhouse Gas (GHG) emission removals for the monitoring period/verification period (01 January 2013 – 31 December 2016) under Reduction Emission from Agricultural Land Management (ALM), where project activities are under the VCS sectoral scope of Agriculture, Forestry and Other Land-Use (AFOLU). 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 Verra or CCBA guidance document. Please also see Section 1.2 of this report.

In the verification process, there is a risk that potential errors, omissions, or 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 the verification team focused on reviewing items that might result in a material misstatement of the reported GHG assertion.

A project-specific Validation/Verification and Sampling Plan was developed to guide the verification auditing process to ensure efficiency and effectiveness. The purpose of the Validation/Verification and Sampling Plan was to present a risk assessment for determining the nature and extent of verification procedures necessary to ensure the risk of auditing error was reduced to a *reasonable* level. The Validation/Verification and Sampling Plan 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 Validation/Verification and Sampling plan 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 visits and is embedded within the Validation/Verification and Sampling Plan.

For the field sampling effort, direct measurement, observation, and interviews were conducted in key areas 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 and best professional judgment of the Verification Team/Lead Verifier to meet a *reasonable* level of assurance.

Soil organic carbon (SOC) was reviewed through detailed review/re-measurement of soil sampling stations during 3 site visits (see Section 2.4 of this report). Additionally, conservancies were visited to review pre-project conditions (observation of adjacent non-project areas) and current project conditions, including community and biodiversity benefits, reported soil types and parameters, reported grazing intensity, reported vegetation characteristics, and related.

The desktop verification component included a full review of all project documentation and calculations received from the Project Proponent to reach *reasonable* assurance, as described throughout this report.

2.3 Document Review

A detailed review of all project documentation was conducted to ensure consistency with, and identify any deviation from, VCS Program requirements, CCB program requirements, the

methodology (VM0032), and the validated PD. Initial review focused on the validated PD and Monitoring Report relative to the field conditions observed and interviews with project management staff. Project details, implementation status of project activities, data and parameters, and *ex post* quantification of GHG emission reductions and removals were thoroughly examined. Key supporting documents were also reviewed. These included remote sensing/Geographic Information System (GIS) data, Standard Operating Procedures (SOPs), financial analyses, property boundaries, maps and aerial images, 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 supporting documentation and confirmed 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 CL findings related to the AFOLU Non-Permanence Risk Tool/Report are presented in Appendix A. The final score was calculated to be 16%.

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

2.4 Interviews

Interviews were performed during the verification site inspection and as part of the overall verification process, and additional detail to that provided in the Project Description is included below. The verification team met with individuals with various roles in the project. This included a series of interviews with on-site and in-country staff who support the mission of the project and other conservation objectives. On-site interviews and informal discussions were conducted during the 3 site visits (22-28 September 2015, 11th-17th June 2017, 20th – 28th March 2018) with project staff, Soils for the Future, The Nature Conservancy, Northern Rangelands Trust, Grevys Zebra Trust, Native Energy and members and leaders of the local communities/conservancies. The interviews confirmed with *reasonable* assurance that community members are unlikely to be negatively affected by the project, community members were eagerly participating in project activities, staff and technical teams are well-trained, and the conservation goals of the project are being achieved. The following is a list of key interviewees:

Individual	Affiliation	Role
Rob McNeil	Northern Rangelands Trust	Chief of Operations
Kieran Avery	Northern Rangelands Trust	NRT Rangelands Director
Moses Lolpusike	Northern Rangelands Trust	Rangelands Coordinator
Moses Lekale	Northern Rangelands Trust	Grazing Coordinator
Kaaso Tolisoka	Northern Rangelands Trust	Grazing Coordinator
James Lebasha	Northern Rangelands Trust	Rangelands Coordinator
Lorla Letinia	Northern Rangelands Trust	Unit Manager
Samuel Lentham	Northern Rangelands Trust	Grazing Coordinator
Chris Lekufe	Northern Rangelands Trust	Westgate Conservancy Manager
Joseph Putunio	Northern Rangelands Trust	Rangelands Officer

Mark Ritchie	Soils for the Future, LLC	President
Jackson Kikardi	Soils for the Future, LLC	Sampling Staff
Emillion	Soils for the Future, LLC	Sampling Staff
Joel (last name not given)	Grevys Zebra Trust	Camp Manager
Tom Stoddard	Native Energy	General Counsel
Kirsten McKnight	Native Energy	Manager, Development
Jacob Penner	Native Energy	Soil Carbon Project Developer
Namanyuk Morans (3 shepherds/warriors)	Project Community	Participants
Kalama Community (15 men/women)	Project Community	Participants
Sera Community (20 men/women)	Project Community	Participants
Westgate Community (20 men)	Project Community	Participants
Westgate Community (41 women)	Project Community	Participants
Joseph (last name not given)	Namanyuk Chief Administrator	Participant
Mbire Community (10 men/women)	Project Community	Participants
Meibae Community (8 men/women)	Project Community	Participants
Meibae Chief Sr Nkaroai	Project Community	Participant
Silango Nanyeki	Project Community	Participant

2.5 Site Inspections

The site visits were divided into two tasks. One centered around resampling soil organic carbon plots in order to replicate project analyses, observing the techniques used by the sampling team to ensure they followed soil science standards, and observing the general condition of the landscape. The other centered around community stakeholder, community leader, project management and project staff interviews to gauge project awareness, attitudes, expectations and understandings.

Three site visits took place 22-28 September 2015, 11-17 June 2017, 20-28 March 2018. During the first two site visits, greater than 130 staff and stakeholder interviews took place at Lewa, Kalama, Westgate, Sera, Namanyuk and Melako conservancies. The focus of the third site visit was resampling soil organic carbon plots. During all three visits, soil plots were resampled, including 18 during the first site visit, 17 during the second site visit and 25 during the third site visit. Greater detail on the outcomes from the staff and stakeholder interviews and the soil sampling efforts can be found in the VCS findings (Appendix A) and CCB findings (Appendix B).

2.6 Resolution of Findings

During the verification process, there was a risk that potential errors, omissions, or misrepresentations would be found. The actions taken when errors, omissions, or 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 Aster Global. Findings were resolved during the verification by the Project Proponent implementing corrective actions such as amending the Monitoring Report 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 Third Edition for GHG projects.

Aster Global Findings are typically characterized in the following manner:

Non-Conformity Reports (NCRs) are 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 Verification Team to confirm *reasonable* assurance for compliance

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

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

During the verification, 7 (seven) essential VCS CL findings were issued. Detailed summaries of each VCS finding, including the issue raised, responses, and final conclusions, are provided in Appendix A VCS NCR/CL/OFI SUMMARY. Please see the Validation Report for all findings raised during the CCB review. All CLs were satisfactorily addressed.

2.6.1 Forward Action Requests

During the VCS validation, a Forward Action Request (FAR) was issued regarding VM0032 applicability condition #3, where "3. The project must be structured to keep livestock within the project area, and the Project Proponent must be able to enforce the boundaries of the project area." **Aster Global did not observe changes related to this FAR from validation to verification and continues to recommend future verifiers examine whether the project continues to meet this applicability condition.** This FAR is re-issued for the benefit of future verifications. Future verifiers are encouraged to check for the presence of animal incursions and to evaluate their potential as a significant source of emissions to be included in emission reduction estimates.

Additionally, a CCB forward action request was issued during validation regarding indicator G5.2. As formal agreements could not be provided because most of these agreements are made in local unwritten languages, and as conflicts currently exist, a forward action request was issued to follow up on the conflicts, particularly those that exist over dispute of land ownership and usage rights. **At the time of this verification, no new progress has been made under this forward action request.** These conflicts and agreements will be required to be reviewed under future verification audits, to continue to confirm compliance with the CCB program.

An additional FAR was raised during the verification which is new and serves to benefit future verifications. Due to the difficulty in applying a consistent, conservative, and replicable method to evaluate grazing reports, the audit team suggests project proponents consider improvements to the format of the grazing reports. This may include but is not limited to training of grazing coordinators, more rigorous QA/QC of completed grazing reports, and a suitable template for grazing reports so that the field personnel can consistently convey livestock patterns on paper as part of a robust MRV. Future verifiers must consider the importance of the interpretation of grazing reports and their contribution to the determination of leakage.

2.7 Eligibility for Validation Activities

Validation activities were conducted concurrently with verification site visit and desktop activities. Aster Global holds accreditation for validation activities under the relevant VCS sectoral scope.

3 VALIDATION FINDINGS

3.1 Participation under Other GHG Programs

The verification team is not aware of nor identified project involvement in other forms of environmental credits from its activities. The project has not been registered nor is seeking registration under any other GHG programs. The project 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 Project Proponents. Therefore, the verification team deems the project eligible to participate under the VCS Program.

3.2 Methodology Deviations

The project has applied a methodology deviation at this verification pertaining to livestock encroachment accounting during the monitoring period. Several parameters are computed differently from those presented in the PD (please see separate PD Deviations section). This was deemed permissible by the audit team because emissions from potential livestock encroachment are being monitored appropriately. The methodology deviation deviates from the criteria and procedures set forth by the methodology (livestock encroachment is not considered in VM0032). The deviation does not negatively impact the conservativeness of the quantification of GHG emission reductions or removals as it ensures additional emissions are being appropriately accounted for. The audit team concluded that these alternate methods to account for potential livestock encroachment emissions can be considered an allowable methodology deviation. **Project Description Deviations (Rules 3.5.7 – 3.5.10)**

Five PD deviations from Section 2.2.4 of the Monitoring Report were identified and verified:

- 1) The project was originally validated with a crediting period beginning on 10 December 2012, as shown in Section 2.1.15 of the PD. However, during the verification process, it was noted that project monitoring period activities were not fully implemented until 01 January 2013.
- 2) The PD had conflicting stakeholder groups listed in Sections 2.1.9 and 4.2.1. The initial section listed stakeholders based on occupation, socioeconomic status, and role in the community; while the latter section listed stakeholders based on ethnic groups. To ensure consistency and remove confusion, the project is monitoring impacts to stakeholders based on occupation, socioeconomic status, and role in the community, which will also encompass different ethnic groups.
- 3) Determination of parameter $PN_{c,t}$ (number of project animals of category c in the project area during year t) has changed from those presented in Section 3.3.2 of the PD. The 2014 conservancy census data is now used to compute the parameter.
- 4) Determination of parameter $ED_{c,t}$ (number of days spent by encroaching [off-project] livestock of category c on the project area during year t) was not mentioned in the PD but has been added to Section 3.1.2 of the Monitoring Report. A de minimis demonstration was provided where encroaching livestock from outside of the project area were worked up using project methane calculation methods. A comprehensive decision tree was provided which aides the reader in determining a reasonably consistent number of livestock by month, by conservancy, and by year, from the grazing reports.
- 5) Determination of parameter $DN_{c,x}$ (number of project animals of type c off the project area during month x) has been updated from those presented in Section 3.3.2 of the PD. A procedure is now described in the monitoring report to handle missing monthly grazing reports.

The Verification Team reviewed these PD deviations by reviewing provided documentation and conducting appropriate interviews with project team members. The Verification Team ensured the

PD deviations were in line with VCS principles and did not materially affect project outcomes (through the de minimis demonstration).

The proposed deviations' impact on any of the following is summarized below:

The applicability of the methodology: The PD deviations do not affect the applicability of the methodology, as the crediting period is still applicable, and the stakeholder groups are simply being made consistent.

Parameter $PN_{c,t}$ is no longer computed as the arithmetic mean of one or more years' animal censuses during the crediting period and instead is now an extrapolated value from the 2014 conservancy census. This method is more reliable than the previous estimation method and does not affect the applicability of the methodology.

Parameter $ED_{c,t}$ was appropriately added to the monitoring report as it is applicable to the methodology.

Parameter $DN_{c,x}$ is affected by this update in a downstream manner and the audit team believes the procedure to be inherently conservative.

Additionality: The PD deviations do not affect the additionality of the project, as the 21-day project start difference still shows the project is additional, and the stakeholders are the same, only classified more consistently throughout the monitoring activities. Additionality is unaffected by changes to the computations for parameters $PN_{c,t}$, $ED_{c,t}$, or $DN_{c,x}$.

The appropriateness of the baseline/without-project scenario: The baseline/without-project scenario has been updated to show the revised project start date, and all calculations are still applicable and complete. The stakeholder group PD deviation only provides clarity and consistency to the monitoring process; thus, it does not affect the appropriateness of the baseline/without-project scenario. The appropriateness of the baseline was unaffected by changes to the determination of parameters $PN_{c,t}$, $ED_{c,t}$, or $DN_{c,x}$.

Each deviation is appropriately described and justified in Section 2.2.4 of the Monitoring Report, and the project remains in compliance with the CCB Version 3 and VCS rules.

The Verification Team thus concludes each project description deviation is valid.

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

As this is the first verification period, which occurred simultaneously with t validation, the project did not experience any changes (minor or significant) to the validated PD and remains in compliance.

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

This is not a Grouped Project. Therefore, this section is not applicable.

4 VERIFICATION FINDINGS

4.1 Public Comments (*Rules 4.6*)

Per the Verra project database, this project was open to public comments for its validation and first verification to the CCB Standards from 04 March - 03 April 2019. No public comments were received.

Per the Verra project database, the project was the subject of an additional public comment period from 04 June to 05 June 2020. No additional public comments were noted.

4.2 Summary of Project Benefits

The project described climate, community and biodiversity benefits in its validated PD. The benefits were reported on the Cover Page of the PD and described throughout the project's reporting. Sections 3.3, 4.4 and 5.4 of the PD describe all monitoring required of project benefits.

Climate benefits have resulted from the main project activity of planned rotational grazing. This will achieve substantial GHG reductions or removals over a 30-year period.

Community benefits have arisen after the planned sustainable grazing has restored grass cover, improved livestock foraging, and provided ecological improvements to areas previously affected by severe droughts. Climate adaptability and access to more water has improved well-being for community members. The improved ecological benefits may increase the sale and quality of beef and dairy products. Finally, the direct revenues achieved by carbon credit sales have and will continue to improve health, education, and infrastructure to the communities.

Biodiversity benefits have been and will continue to be achieved by the resurgence of perennial grasses and soil water retention. This will assist four identified endangered wildlife species in re-populating the project area. The increase in diversity of grasses and other endemic plants will increase biodiversity in not only the rangeland plants but in trees, insects, and birds.

Section 1.1 of the PD describes the unique benefits of the project as follows:

Unique Benefits of Project	PD/MR Section Reference	VVB Summary of Review
"1) Local communities, oriented around 14 wildlife Conservancies organized under an NGO called the Northern Rangelands Trust, engage in new planned rotational grazing practices, as opposed to repeated, permanent grazing simultaneously on all grazing lands. These new practices, which would not occur without significant carbon revenues to motivate change in herder behaviour, will allow recovery of perennial grasses and the	4.1	The Verification Team confirmed the project benefit through site visit observations, meetings and interviews with conservancy and community members; review of soil samples; review of project

restoration of soil organic carbon. This is one of the first improved grazing management projects, and at its inception, it will likely triple the land area under projects focused on removing greenhouse gases to soil organic carbon.		calculations; and review of all other project documentation. The stated section reference is correct.
2) The project will yield significant removal of CO ₂ from the atmosphere, through improved grazing management, verified as altered grazing intensities, records of the time, timing and number of livestock grazers using different portions of the project zone, and vegetation change across 2.01 million ha, with 1.71 million ha of soils suitable for storing carbon. With expected annual removals of approximately 0.75 metric ton CO ₂ e/ha on average, the project should eventually annually remove more than 1 million tons CO ₂ e and 30.7 million tons CO ₂ e over the project lifetime.	3.2	The Verification Team confirmed the project benefit through site visit observations; review of soil samples; review of project calculations; and review of all other project documentation. The stated section reference is correct.
3) Multiple communities and ethnic groups will participate in an annual regional grazing plan that allows livestock to move over long distances and efficiently use wet and dry season range. This provides unprecedented rest and opportunity for recovery of vegetation and assimilation of carbon from the atmosphere into roots and soil organic matter.	5.2/5.3	The Verification Team confirmed the project benefits through site visit observations, meetings and interviews with conservancy and community members, and review of all other project documentation. The stated section reference is correct.
4) Clear long-term benefits will result from restoring perennial grasses as a consequence of rotational grazing will provide grass banks and a lower likelihood of catastrophic livestock loss during drought, sustained meat and milk production through the dry season, and heavier livestock that are saleable in the burgeoning Kenya beef market. Improved soil organic matter should help increase rainfall infiltration and lengthen the time surface water is available for people and livestock. Payments to communities through NRT will also be used to fund health care and bursaries that provide benefits to the poorest community members, such as paying school fees. In the short term, grazing plans have led to a	5.3	The Verification Team confirmed the project benefit through site visit observations, meetings and interviews with conservancy and community members; and review of all other project documentation. The stated section reference is correct.

stronger perception of community connection to land, reduced conflicts over grazing, and some re-claiming of Conservancy areas that were previously thought to be unsafe, as revealed by the results of focus group interviews and household surveys. These benefits to both financial, social and natural capital at the level of both communities and individuals have reduced tensions between ethnic groups and fostered better collaboration among different Conservancies, leading to greater physical and social capital. Revenues to communities should help develop infrastructure such as schools, health clinics, water collection and storage facilities, thus increasing human capital by reducing food and water insecurity.		
5) The ecological vegetation and soil changes from the implementation of the project should also enhance the region's role as a High Conservation Area for key endangered species, such as Grevy's zebra (<i>Equus grevyi</i>), black rhino (<i>Dicornis bicerors</i>), and elephant (<i>Loxodonta africana</i>). It will also benefit other endemic bird and ungulate species in the project area's biogeographical position connecting species from the Rift Valley to the south to the Sahel to the west. Also, the project should improve species diversity across a number of groups of key bio-indicator taxa, including plants, birds, and key insect groups, such as grasshoppers (Orthoptera) and dung beetles (Coleoptera: Scarabeidae). The potential for the project to enhance biodiversity is evident from effects of improved grazing on these groups detected by comparing year-round grazed areas vs protected areas and those with limited grazing use. The project will also reduce pressure from livestock use during drought in isolated "sky island" forests on mountain ranges adjacent to the project area but within the project zone, such as the Mathews and Ngare Ndare Forests."³	3.3/5.4	The Verification Team confirmed the project benefit through site visit observations and review of all other project documentation. The stated section reference is correct.

Prior to the verification site visit, the Verification Team assessed the monitoring plan and the reported community benefits reported by the Project Proponents. A list of questions to guide interviews on-site were developed to confirm reported community benefits. Although room for

³ Northern Kenya Grassland Carbon Project *Project Description*, 28 April 2020, v6.0

improvement in some areas was noted, the Verification Team confirmed reported community benefits are correct. Community members and stakeholders in the Project Area and Zone were confirmed to take part in new planned rotational grazing practices via the annual regional grazing plan. It is clear to the Verification Team these benefits are having a positive impact.

The Verification Team was able to confirm that the successes of the project in restoration and protection of the project area are inextricably linked to benefits in biodiversity. Net positive biodiversity benefits can be expected from ALM activities restoring perennial grasses, including native plant species and associated habitats.

The Verification Team concludes through site visit observations, interviews and document review that during this first monitoring period, the project has shown substantial climate, community and biodiversity benefits from avoided emissions. The Verification Team was also able to confirm the project has demonstrated that the rights and needs of local communities have been appropriately addressed, as well as important biodiversity conservation issues.

4.3 General

4.3.1 Implementation Status (G1.9)

The project activities and Monitoring Plan, as described in the validated PD, have been fully initiated. There are no remaining issues from the validation.

The Monitoring Report covers the period from 01 January 2013 through 31 December 2016. The Verification Team requested to visit examples of all activities during the site inspection and subsequently confirmed the implementation of items related to climate, community, and biodiversity. Climate objectives achieved included avoiding the emission of 3,822,118 tCO₂e.

For this monitoring period, the Verification Team witnessed ongoing conservation and restoration efforts focused on rotational grazing practices. During the site visit, CCB components concentrated on the communications between communities, stakeholders and the project, as well as training. It was clear to the Verification Team that community objectives are to engage with the communities in the Project Area/Zone to improve access to planned rotational grazing activities.

The non-existence of any material discrepancies between project implementation and the Project Description was confirmed through the overall audit process, including interviews and documentary review. The implementation status of the Monitoring Plan and the completeness of monitoring, including the suitability of the implemented monitoring system, was confirmed through review of VM0032 adopted procedures and comparison of monitoring results against the validated project design.

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 nor sought any other form of environmental credit, as confirmed through a risk-based review by the Verification Team (see Section 3.1). The project has not participated in or been rejected under any other GHG programs since validation.

Section 2.1.10 of the Monitoring Report states the following sustainable development contributions the project achieves: eradicate extreme poverty and hunger, promote gender equality and empower women, reduce child mortality, improve maternal health, and ensure environmental sustainability. Through the verification process, including site visit observations and interviews, the Verification Team is assured the project's activities have contributed or will contribute to the stated sustainable development initiatives from Section 2.1.10 of the Monitoring Report.

There are no methodology deviations or minor changes to the PD, as part of this monitoring period. Please refer to Section 3.3 of this Verification Report, which thoroughly discusses and addresses the previously mentioned PD deviations.

Verifiers can conclude that the project has been implemented as described in the validated PD.

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

Section 2.2.6 of the Monitoring Report describes risks to the project, which were assessed with the VCS AFOLU Non-Permanence Risk Tool (v4, 19 September 2019). The Verification Team reviewed the project's stated risks and issued several findings to clarify the analysis. The outcome was a project risk summary that accurately reflected all associated internal, external, and natural risks, for an overall rating of 16%. The project has taken steps to reasonably mitigate risks. All Findings associated with the verification risk review can be found in our Issues Log (Appendix A).

4.3.3 Community and Biodiversity Benefit Permanence (G1.11)

The project is part of a large, multi-entity effort to restore rangelands and improve well-being in northern Kenya. The Monitoring Report describes the incentives the project has created, including "healthier and more valuable livestock, improved forage production, surplus production that can be used as grass banks against drought, improved small stock and milk production during dry seasons, and lower physical risks when migrating to dry season ranges with livestock."⁴ The incentives are providing a continued barrier for returning to pre-project activities.

The Verification Team assessed the permanence of these benefits by reviewing the project activities during the site visits, including observations and interviews with project staff and stakeholders. Through the verification process, the Verification Team is assured of the permanence of the stated benefits and believes reasonable measures have been taken to enhance the project benefits beyond the project lifetime, in accordance with the project description.

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

On 15 May 2015 and again on 15 August 2016, after a solicitation of participation and public comment period, an announcement and information about the project was distributed by NRT grazing coordinators and other staff in the form of pamphlets and an announcement on the NRT website (<http://nrt-kenya.org>). Community meetings occurred in September and October of 2016 in each of the 13 Conservancies. An annual training meeting occurred in September 2017. Planned annual meetings will also occur in the future.

⁴ Northern Kenya Grassland Carbon Project *Project Description*, 28 April 2020, v6.0

Additionally, photos with date stamps were provided to satisfy the Verification Team's request to prove local-language documents had been posted in multiple locations, describing the public comment process. Scanned copies of signed letters from each of the 14 conservancy chairmen were provided to the Verification Team. These letters further explained relevant project information.

The Verification Team confirmed appropriate access to project information was given throughout the verification process, specifically through site visit interviews detailed in Section 2.4 above.

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

Sections 2.3.7 and 2.3.8 of the Monitoring Report reiterate stakeholder consultation described above and that surveys revealed one of the main fears of community members is encroachment by outside herdsmen. The project directed efforts to resolving conflicts with off-project herdsmen and also developed agreements between groups within the project as a result of the surveys.

Sections 2.3.9 and 2.2.1 of the Monitoring Report describe ongoing meetings in the communities, which were confirmed to have occurred during the verification site visits. Community surveys were also confirmed to be conducted as scheduled in 2016. The participatory process described in the PD is still ongoing during this monitoring period, as confirmed by the Verification Team.

The Verification Team thus concluded the project carried out effective community consultation.

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

Societal divisions of labor yield most grazing decisions being made by men. The project notes women are influential when they are heads of household and also in the sale of livestock. The Morans are involved through input to grazing committees throughout the project. The Verification Team confirmed these assertions during the field visits and desk audits and concludes the project enabled stakeholder participation in decision-making and project implementation.

4.3.7 Anti-discrimination (G3.7)

NRT personnel constitute the majority of project staff. . The NRT Human Resource Policy, with a sexual harassment and discrimination policy is available online, and it has robust policies against harassment and bullying.

In interviews with staff, no harassment of any kind was reported.

With the grievance procedure in place and no outward indications that sexual harassment is a problem, the Verification Team confirms proper measures for anti-discrimination and harassment are being employed by the project.

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

The project's grievance procedure was examined and found to have all the features required by the CCB Standard. NRT employees interviewed were aware of the procedure. The Verification Team confirms the grievance redress procedure has been implemented according to the project's validated design.

4.3.9 Worker Relations (G3.9 – G3.12)

Aside from the soil sampling team, worker training is handled by NRT and is guided by the NRT Human Resources Manual, which was supplied to the Verification Team. It was clear throughout the Verification audit that NRT encourages formal training.

Grazing coordinators are local hires. Training included off-site university, USFS, and Savory Institute training. Training in grazing management is provided to grazing committee members in workshops on an annual basis, targeted toward women and elders.

Conversations with grazing coordinators during the site visits confirmed the extensive, off-site training that was provided, including training taken in the U.S. Conversations with and observations of employees and management of NRT indicate a dedication to maintaining highly trained personnel.

Community employment opportunity availability was confirmed through the NRT's State of the Conservancies report, as well as interviews and observations during site visits. According to the report, 45% of NRT staff are from the conservancies. During the site visit, many of the staff were confirmed to be from the local area.

Female staff members were also present and were interviewed. The report states that 30% of staff members are women, which is somewhat higher than the national average of 25% of jobs filled by women.

NRT staff must sign a letter of employment, which outlines legal and contractual obligations between the company and employee. The NRT employee manual outlines employee rights and follows laws and regulations governing employee rights.

The project documentation lists the job positions involved in the project and the potential risks inherent in each one. A set of mitigation actions for each risk is provided. The risks and associated mitigations listed are reasonable, given the job activities and observations during the site visits.

The Verification Team concludes the relationship between workers and the project upholds the intent and design presented in the validated Project Description.

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

The key technical skills required to ensure capacity over the lifetime of the project include social engagement expertise, livestock/grazing management, conflict resolution ability, administrative support, social, biomass and wildlife monitoring, carbon accounting, modeling skills, marketing and fund-raising. The appropriate entities with appropriately skilled personnel are responsible for each or coordinate with each other for each task.

NRT is clearly skilled at managing the cooperation between diverse conservancies for wildlife and grazing purposes. SFTF was responsible for the methodology and model used in the project. Through frequent contact and discussion, Native Energy appears to be an involved, market-driven organization. The diverse nature of the entities involved shows financial health behind the project.

In addition to the main entities involved in the project, some credit was given to Grevvy's Zebra Trust for training that led to the adoption of rotational grazing, CIAT for help in soil carbon and plant tissue analysis, and ICRAF, who helped determine baseline carbon stocks. Discussions with CIAT and ICRAF personnel confirm their involvement and their expertise is sufficient to implement the project successfully.

Thus, the Verification Team is also assured that the project is not complicit in any form of corruption.

Based on all site visit observations and interviews, review of training manuals, and review of supplementary financial information, the Verification Team confirms the project has the capacity to implement the project in accordance with the validated Project Description.

4.3.11 Commercially Sensitive Information (Rules 3.5.13 – 3.5.14)

No commercially sensitive information has been excluded from the Monitoring Report.

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

Property rights in the project area are either conferred by the people of a conservancy registering as group ranches or by land trust. Both confer grazing-related land assets, including soil carbon. Rights are further cemented by the Community Lands Act of 2016. Rights to benefit from soil conservation are conferred by the right to register lands as conservancies by the Kenya Wildlife Conservation and Management Act of 2013. Conservancies are legal entities (certified trusts recognized by the Kenya Revenue Service) that can sign contracts to benefit from conservation over geographically delineated areas (presented in their management plans). Selections of certifications of trust, tax PINs and management plans for Conservancies were reviewed to understand and confirm the rights of the conservancies to make commitments for the project areas.

Some of the conservancies have grazing rights conferred by Group Ranch status, as described in the Kenya Land Act of 1968. The others are on Trust lands and have rights conferred through the Kenya Trust Lands Act of 2010, and further through the Kenya Community Lands Act of 2016. Rights to benefit from soil conservation are conferred by the right to register lands as conservancies by the Kenya Wildlife Conservation and Management Act of 2013. Conservancies are legal entities (certified trusts recognized by the Kenya Revenue Service) that can sign contracts to benefit from conservation over geographically delineated areas (presented in their management plans). Selections of certifications of trust, tax PINs and management plans for Conservancies were reviewed to understand and confirm the rights of the conservancies to make commitments for the project areas.

Participation in the project is voluntary and the project takes no ownership of lands. Community property remains with the communities. Land used for grazing is still used for the same purpose by the same people. This was explained at community meetings and workshops during site visits.

Increasingly, there is an expectation the land be leased before livestock are grazed on it. Encroachment by the project on surrounding lands is discouraged.

The conservancies, communities and the NRT had their governing structures prior to the project. Project Proponents do not require or request the relocation of anyone. If that is done, it would never be a result of the project, and it would follow established methods of decision-making. The site visit

confirmed that the conservancies and NRT existed well before the project. The project itself has no power to relocate people and no reason to do so.

The nature of the project makes it difficult to imagine project benefits derived from illegal activities, as the project benefits are derived from rotational grazing. No project activities (monitoring, sampling) are covered by any law. Human surveys are covered under TNC and NRT-approved social science research.

Some armed disputes between ethnic groups do occur, including stealing livestock and armed takeover of grazing areas or watering places. Ongoing disputes generally involve cattle raiding between different ethnic groups, which is part of local tradition. This has become worse in recent years, due to the availability of firearms. Conflicts will be addressed by NRT and government response teams or through peace meetings. NRT has had some success in bringing groups together to discuss differences and through peace meetings. This was confirmed in interviews and observations during the site visit. However, project activities are inherently unrelated to these kinds of disputes.

The Verification Team concludes the project has protected the rights of Indigenous Peoples, communities and other stakeholders in accordance to the third edition of the *Climate, Community & Biodiversity Standards* and the validated Project Description.

4.3.13 Legal Status (G5.6)

Grazing rights are conferred by land ownership laws, as discussed previously. Several labor laws were listed, which also affect the project and project employees. Project documentation states NRT abides by and will continue to abide by these laws.

National and local laws do not affect project activities, in that the people have the right to graze the lands to which they have rights. Site visit observations and interviews during verification with NRT staff indicate NRT abides by these labor laws.

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 VM0032. 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 re-calculated 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 (1%), 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 VM0032 and the validated PD. A subset of the data and parameters monitored, along with Verification Team findings, are included in the table below. For a full description of the Verification Team's findings, please see Appendix A.

Data Unit / Parameter	Accuracy of GHG emission reductions and removals	Whether methods and formulae set out in the PD have been followed	Appropriateness of default values
PA _{m,t}	Verification team confirmed the project area in stratum m in year t * were correct by recalculating areas. The areas appropriately remained unchanged from validation.	This parameter was reviewed and re-calculated using methods set forth in the methodology and the PD and confirmed followed.	Not applicable
PN _{c,t}	Verification team confirmed the mean number of project animals of category c in the project area during year t were correct by recalculating and checking input values. The value was traced to the livestock and household numbers measured directly during 2014 conservancy census. The extrapolation methods were found to have been completed appropriately and correctly.	This parameter was reviewed and re-calculated using methods set forth in the methodology and the PD (please see PD Deviations Section 3.3 of this report) and confirmed followed.	Not applicable
SOC% _{j,m,Z}	The proportion soil organic carbon at station j in stratum m at time (year) = Z, the number of years sufficient for changes in SOC at individual sampling stations was confirmed by observations and discussions in the field to confirm their appropriateness.	This parameter was reviewed and re-calculated using methods set forth in the methodology and the PD and confirmed followed.	Not applicable
BULK _{j,m,Z}	The bulk density in stratum m, station j, year Z was confirmed by observations and discussions in the field	This parameter was reviewed and re-calculated using methods set forth in the	Not applicable

	to confirm their appropriateness.	methodology and the PD and confirmed followed.	
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The methods and formulae set out in the PD for calculating baseline emissions, project emissions, and leakage were confirmed to have been followed. The total end of the 2013-2016 monitoring period carbon stocks in all project activities for all relevant pools resulting from carbon stock changes were correctly quantified. Analysis of project 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 to a reasonable level of assurance and in accordance with the validated PD and VM0032.

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 reductions reported by the project. Throughout the verification, the Project Proponent demonstrated a commitment toward conservativeness and took all measures appropriate 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 Validation/Verification and 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 was 1% for this large project.

The evidence provided to determine emission reductions reported in the Monitoring Report 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 transposition 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 monitoring data and evidence as compiled for quantification steps and reporting. The documentation organizes project methods and data. The Monitoring Report provides additional detail on project data management methods and structure.

The final documents received from the Project Proponent supporting the determination of GHG removals can be viewed in Appendix A.

4.4.3 Non-Permanence Risk Analysis

The Monitoring Report utilized the non-permanence risk analysis tool, AFOLU Non-Permanence Risk Tool, to assess risk according to internal risk, external risk, natural risk, and mitigation measures for minimizing risk. The Verification Team reviewed the Non-Permanence Risk Report following VCS Requirements and confirmed that the project adheres to the requirements set out in the VCS AFOLU Non-Permanence Risk Tool. At all levels, 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 findings related to the AFOLU Non-Permanence Risk Tool/Report are presented in Appendix B.

The final score was calculated to be 16%. A brief review of each factor is found in the table below:

Risk Factor	Rationale & Quality	Conclusion
Internal Risks		
Project Management	No non-native species or GMO species have been used. The combined management team (including SFTF, NRT, TNC and Native Energy) includes individuals with skills necessary to undertake all project activities. Management team (primarily NRT) is located within country and project areas. Management team includes individuals with significant experience in AFOLU project design and implementation, carbon accounting and reporting (e.g., individuals who have successfully managed projects through validation, verification and issuance of GHG credits) under the VCS Program or other approved GHG programs. An adaptive management plan has been provided and has been implemented.	A risk rating of -4 is appropriate given the rationale as the management team has demonstrated appropriate qualifications and all statements made are substantiated.
Financial viability	Project Proponents provided the Verification Team appropriate and verifiable documentation to prove that the project's financial resources are available and have been secured. Items presented to the Verification Team by Project Proponents give reasonable assurance that the risk rating for financial viability is appropriately set. Values were sourced from reputable sources and calculations were confirmed correct through data checks.	A review of the financial resources has been confirmed so a risk rating of 1 is appropriate.
Opportunity Cost	A comprehensive NPV analysis was provided to substantiate the most profitable alternative (industrial paper pulp plantation) is likely in the without-project scenario. The financial model was confirmed through materials that	The NPV analysis and supporting materials provided were reviewed and appeared

	substantiate NPV assumptions. Literature sources were found to be reputable. The Verification Team traced key values in the NPV calculations worksheet to confirm their source and correctness.	appropriate. A risk rating of -6 is appropriate given the rationale provided.
Project Longevity	The Verification Team reviewed the documentation provided and agrees that together, the WCMA, the CLA and the Kenya Constitution amount to a protected area law that, per the risk tool, “avoids emissions,” as they protect the project area and all other land, from management activities that degrade land resources such as soil carbon.” The crediting period is 30 years. The start date is anchored by the timing of initiation of yearly migrational grazing plans by the first four Conservancies (Il Ngwesi, Kalama, and Westgate), and the signing of a joint MOU between NRT and the Nature Conservancy to administer and finance the implementation of the project. As such, the value applied was appropriate.	A risk rating of 15 is appropriate given the rationale provided.
Total Internal Risks		6
External Risks		
Land Tenure	For this Kenyan project, the ownership and resource access/use are held by different entities. The government owns the land, but project participants are communities organized into Conservancies with full rights authorized by their registration (currently in application) as Conservancies with the Kenya Wildlife Service to graze, sell tourism and benefit from other natural resources. There exist disputes over access/use rights (or overlapping rights). Conservancies, or individual herders from different ethnic groups occasionally have disputes with one another over access to grazing or water. As discussed, the project area is protected by a 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	A risk rating of 5 is appropriate given the rationale provided.
Community Engagement	Extensive stakeholder consultation and community involvement was confirmed during	A risk rating of 0 is appropriate given

	the site visits. Consultation on community needs was confirmed for those communities visited. The project has strong intentions to improve the social and economic well-being of local communities and has begun achieving that. The project generates net positive impacts on the social and economic well-being of the local communities who derive livelihoods from the project area, which is substantiated by joint validation under the Climate, Community & Biodiversity Standards (CCBS).	the rationale provided.
Political Risk	Verification Team confirmed the political risk to be rated correctly for Kenya's average governance score from the World Bank as well as the fact that Kenya is implementing REDD+ Readiness activities.	A risk rating of 2 is appropriate given the rationale provided.
Total External Risks		7
Natural Risks		
Natural Risk	The risk rating given for fire was justified by soil carbon decreases under highly persistent fire, but a single infrequent fire is not likely to have any measurable effects on soil carbon. Grazing under the project scenario will still reduce fuel loads, thus making fire unlikely. The validation team agrees with this assessment as being appropriate with a risk rating of 1. The risk rating given for pest and disease was justified by scientific research supporting the notion that disease agents that might affect tree or grass species will likely have negligible effects due to their complex leaf chemistry. Validation team agrees with a risk score of 0. While the likelihood of drought is high, the significance of its impact on soil carbon is lower due to the need for soil microbes to access stored carbon stocks when lack of rain decreases new soil carbon inputs. Mitigation is supported by the fact that project activities are targeted to restore soil carbon to degraded soils. An overall score of 1.5 is reasonable	A combined natural risk rating of 3 is appropriate given the rationale provided and all statements made are substantiated.

	The Verification Team agrees with the project's justification for geologic events. The project area displays evidence of geological activity, particularly surface lava flows that produce extensive lava plateaus in the region. However, these flows are not currently erupting, and the most recent activity dates back more than 100,000 years, resulting in a risk score of 0. Climate change was determined to be insignificant, though the likelihood of impact was between 10-25 years. Prevention measures included adjusting livestock herd sizes and grazing rotations to account for any long-term decline in rainfall. A score of 0.5 was given.	
Total Natural Risks		3
Overall Risk Rating = 16% Non-Permanence Risk Rating = 16%		

In summary, 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 16% correctly. As required, risk will be reassessed and given risk scores at each verification period.

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

During the site visit meetings with stakeholders, including community members and NRT staff, the Verification Team confirmed the project summary and monitoring plan details were distributed. Some people (particularly NRT and community Chiefs), had received the project summary, which included elements of the monitoring plan. However, due to a high rate of illiteracy in the region, many were unable to read it. The interviews were able to confirm there was a reasonable level of understanding of project elements. It was evident that the NRT communications network is well-structured to reach communities and will serve as a sufficient channel to communicate the periodic monitoring results. Therefore, the Verification Team can confirm the results of climate monitoring were disseminated in accordance with the validated Project Description.

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

One of the main results of the project activity and the reason the project will produce VCUs is increasing SOC. This is known to increase water infiltration and retention for plant growth and should result in higher quality forage being available, for a longer period of time, into the dry season. Biodiversity HCVs should also benefit from increasing SOC, for the same reason. These aspects

will inevitably assist communities and biodiversity to adapt to the probable impacts of climate change, thus achieving the results indicated in the project's causal model.

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

As climate change variability is expected to increase, the Monitoring Plan included measures to monitor adaptation, including procedures for gravimetric soil water content. Milk availability and distance to water seem have also been included as appropriate metrics to monitor that project activities will provide climate change adaptation benefits to communities.

The Verification Team confirmed the project is monitoring these measures, though most benefits have not been materially realized yet due to validation occurring simultaneously with verification. The Verification Team will continue to review these aspects in future events and is thus assured that the project is providing necessary and adequate climate change adaptation benefits to communities.

4.5 Community

4.5.1 Community Impacts (CM2.1)

Community impacts are derived from the improvement of grazing land in the project area. The methodology and project are designed to increase SOC, which has increased the quality and productivity of the land and provided other ecosystem benefits. The increased quality and productivity of the land has led to improved health and wealth of community members.

Distribution of the community shares of carbon proceeds have had positive impacts. Further, Section 4.1.1 of the Monitoring Report details the positive community impacts, such as benefits from the implementation of grazing plans, reduction of income decreases by 29%, employment of poorest 25% increasing by 7% from the baseline, a reduction in time to gather water, increase of the sale of milk, and an increase in households consuming milk.

All items were observed and reviewed during the site visit and desktop analysis. The Verification Team confirms the project is achieving these modest benefits, which will continue to increase as the project progresses.

4.5.2 Negative Community Impact Mitigation (CM2.2)

The Project has identified negative community impacts and associated mitigation as follows:

- Increased migration may lead to ethnic conflicts and livestock theft; **mitigation:** rapid response teams, anticipatory shared grazing agreements and peace meetings, regional grazing plans, and better communication between grazing coordinators and game scouts to facilitate conflict resolution.
- Family members being away from home for longer periods of time; **mitigation:** Many herders are already away from home for up to 9 months of the year in response to drought and low forage availability. Proper management, with accompanying recovery of vegetation on home Conservancies, may actually increase time at home.

- Carbon revenues may be converted into additional livestock, creating a small net positive benefit; **mitigation:** Conservancy revenue distributions go mostly for public goods and are decided at open community meetings. There will likely be little personal return of cash, and thus capital to buy more livestock, to individual households.

The Project also provided a breakdown of expenditures (Figure 12 of Monitoring Report), showing the majority being allocated for education. This spending ensures benefits are extending to the poorest 25%, women, younger herders, and multiple indigenous ethnic groups.

Through extensive interviews during the site visit and review of project documentation, the Verification Team is assured that these possible negative impacts are being mitigated to the greatest current extent.

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

Site visits allowed the Verification Team to witness the condition of the land under decades of the baseline, which is also the without-project scenario. Improvements in the SOC have been and will continue to improve the well-being of the community.

Productivity and water holding capacity of the landscape has increased, which increases the ability of the pastoralists to adjust to the expected increase in droughts. The soil holds more water that would otherwise run off, which is then used by plant life to increase biomass production.

Metrics monitored included income levels, milk consumption, access to water, helpfulness of the project, employment, and livestock ownership. Interviews conducted during the site visit confirmed that metrics cited by the project were being achieved on-site.

4.5.4 Protection of High Conservation Values (CM2.4)

High Conservation Values (HCV) were monitored by observation of satellite-based MODIS imagery, which confirmed a non-increase and in some cases a reduction of project livestock into HCV areas. This data was conservative, comparing baseline imagery during a wet season to project-scenario imagery during a dry season. Project communications data shows a reversal of encroachment into the Matthews Forest.

The Verification Team reviewed the imagery, and site visit observations and discussions confirm that HCV areas are being protected by project activities.

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

Offsite stakeholders are described as herders from other group ranches or trust lands. These other stakeholders are being engaged through negotiated agreements of grazing committees. The Regional Grazing Plan established by NRT will use real-time drought data to as an information system. This information will be used to accommodate offsite stakeholders as well.

Rapid response teams and peace meetings have been demonstrated to be effective and positive, as confirmed by the Verification Team through on-site interviews and meetings. These offsite stakeholder impacts will continue to be monitored throughout the project.

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

Household surveys were conducted in November and December of 2015 in the four conservancies, representing ethnic groups encompassing the project area. The Monitoring Report reported Melako and Nakuprat-Gotu conservancies had begun to implement their grazing plans, while Kalama and Il Ngwesi had implemented grazing plans since 2013. Village chairmen and conservancy managers strategized to ensure key stakeholders, women and underrepresented groups were identified for future targeting.

Surveys were conducted, as confirmed during Verification Team during the site visits, and indicator questions were asked and then assembled to have a complete picture of how the project is affecting women, among other underrepresented groups. The indicators compared the project scenario to the without-project scenario for resources, household health, and recognition of benefits of the project activity. Further, livestock numbers for each conservancy were also assessed from monthly grazing reports.

The results of the surveys showed income, security, and access to milk and water for multiple stakeholder groups, including smallholder/community members and women, have increased in comparison to the baseline. This was confirmed by the Verification Team throughout the audit process and during the site visits.

Therefore, the Verification Team can confirm the community monitoring plan was carried out in accordance with the validated Project Description.

4.5.7 Community Monitoring Plan Dissemination (CM4.3)

Monitoring was performed by local community members and was disseminated at public grazing committee meetings and made available at conservancy headquarters throughout the project area. Photos of monitoring reports at these locations was provided to the Verification Team.

Project documentation and monitoring results were also made available at annual workshops.

During the site visit, the Verification Team observed that most people were aware of the project and many were aware that project documentation was available for inspection.

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

Community members collectively and individually have rights to the land that constitutes the project area. Their cooperation in joining in project activities will generate the project's benefits.

Evidence of ownership and control of land use was provided in the forms of certificates of incorporation and Tax Authorization, and draft applications for conservancy management plans. The conservancies that are part of the project area are part of the Kenya Wildlife Conservancies Association.

Short and long-term community benefits were derived from the distribution of project revenues to communities (short-term) and the restoration of grazing lands in the project area.

Short-term benefits derived from distribution of project revenues are not specifically known yet by the project because the project does not determine how the money will be spent beyond setting up guidelines. It is *reasonable* to assume that project revenues from carbon sales distributed to the communities will be a benefit to those communities versus no such revenues being available.

The restoration of grazing lands has and will continue to provide a positive well-being benefit for all community members in pastoral communities. The Verification Team confirms the project has implemented short-term and long-term community benefits in accordance with the PD.

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

The project does not pose the kinds of risks to the communities, like loss of yield or food security described for this indicator, as the activity is simply a change in grazing patterns and not a reduction in livestock numbers. The risks, like risk to the project from drought, would be faced by the communities regardless of the project activities taking place.

The main risk envisioned by community members is encroachment of outside herders on project area lands while their livestock is grazing on pastures far from home. These risks and fears are allayed through rapid response teams, responding to incursions and conflicts with outside herders.

Site visit interviews confirmed the existence of the groups who are to respond to these conflicts. They are reasonable responses to the risk.

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

Marginalized groups received project benefits in two ways:

1) The poorest 25% of people who own livestock benefit as anyone else in the community would benefit – through increased quality of the range.

2) In addition, the poor are expected to benefit through the bursary system on the conservancies. Funds going to the bursaries are used to educate children of the poorest households. While the project has no control over where the communities will decide to allocate their share of carbon funding, past records of conservancy expenditures show that the single greatest allocation of funds goes to the bursaries. It is therefore likely that when funds come in through carbon markets, the children of the poorest households will benefit from it.

No negative impacts are expected, so impacts are net positive for the project area's most vulnerable community members. These benefits for marginalized and/or vulnerable community groups were confirmed during site visit observations by the Verification Team.

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

Most women will benefit for the same reasons that men in the communities will benefit – through the improvement of the quality of the range and its subsequent effects on livestock health and production.

It was clear from site visit interviews that efforts had been made to include women in planning meetings. However, women traditionally do not make many decisions regarding cattle grazing, other than decisions regarding livestock sales and regarding livestock movements within their household, unless they are heads of household.

Poorer women's families will benefit through the bursaries, which includes many of the households headed by women.

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

The PD and Monitoring Report provide an explanation as to how decisions on the expenditure of project funds distributed to the communities will work. The project has no control over these funds, but they are determined through public meetings, which are open to all. This was confirmed during conversations and interviews held during the site visits.

Past expenditures indicate a significant amount of the funds are likely to go toward the bursaries.

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

Most women will benefit for the same reasons that men in the communities will benefit: through the improvement of the quality of the range and its subsequent effects on livestock health and production. The governance and implementation structures of the project facilitates identification and participation of smallholders, women, and minorities to committee meetings

It was clear from site visit interviews that efforts had been made to include women in planning meetings. However, women traditionally do not make many decisions regarding cattle grazing, other than decisions regarding livestock sales and regarding livestock movements within their household, unless they are heads of household.

Poorer women's families have and will continue to benefit through the bursaries, which includes many of the households headed by women. The Verification Team confirmed this inclusion during site visit interviews.

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

Capacity of smallholders/community members is continuing to be developed by the employment of personnel for project-related work. Education efforts by grazing coordinators and NRT/SFTF staff were directed to women and children in several conservancies during 2014 and 2016. These efforts were confirmed through on-site interviews and observations by the Verification Team. Therefore, the Verification Team can attest that the project is developing the capacity of smallholders/community members, and relevant local organizations or institutions, to participate effectively and actively in project design, implementation and management.

4.6 Biodiversity

4.6.1 Biodiversity Changes (B2.1)

The Project asserts the HCVs in the Project Zone and multiple beneficial enhancements expected from the project activity of planned rotational grazing has and will continue to increase ecological benefits, improve the ability of the land to recuperate after extreme weather conditions, improve soil organic content, and improve species diversity.

The Verification Team confirmed these assertions through interviews and observations during multiple site visits. Further, the Verification Team reviewed referenced literature to confirm the stated biodiversity changes that are expected to be net positive in the with-project scenario. These will be further confirmed in future verification events.

4.6.2 Mitigation Actions (B2.3)

A potential negative impact from the project is the temptation to move livestock into the Matthews Forest Reserve while other project lands are resting from grazing. This will continue to be mitigated by the newly occurring grass banks, which will provide short term rest and drought forage bases for livestock moved from resting project lands.

Another potential negative impact is improved socioeconomic conditions leading to more access to poaching weapons. However, poaching is not likely, as the pastoral groups within the Project consider the consumption of wild meat taboo.

A third potential negative impact is herders from communities outside the project area accessing improved grazing on project lands. This will be mitigated by agreements put in place to dictate where these herders may go, in line with the planned rotational grazing. Conflicts will be settled by a process described in the community sections of the PD.

A final potential negative impact is increased wildlife utilization of Project Zone areas as conditions improve inside it. Though this is considered an unmitigated potential impact, the Project's relationship with Kenya Wildlife Service will allow it to continue its wildlife conservation measures, and future wildlife use of the Project will be monitored.

The Verification Team confirms the Project has accurately identified potential negative impacts from project activities and has begun to implement sufficient mitigation measures to offset them, in line with the precautionary principle. These impacts will continue to be monitored and reported in future verification efforts.

4.6.3 Net Positive Biodiversity Impacts (B2.2)

The PD and Monitoring Report includes some results of wildlife scout observational studies taken in 2012 for the baseline and further results from 2015. Sightings and densities of three umbrella species increased. In addition, fewer elephants have been poached in the area since the start of the project, which is attributed to increased patrolling by game scouts and grazing coordinators.

The Project also made baseline measurements of species diversity in the indicator groups of plants, birds, grasshoppers and dung beetles in different areas (core, buffer, settlement) that indicate an improved range will also increase biodiversity.

The Glew article⁵ states that the initial change to conservancy management (2000-2007) in the NRT lands resulted in significant improvement to habitat conditions, coinciding with improvements in range conditions.

Based on review of the stated literature and site visit observations, the Verification Team confirms and concludes net positive biodiversity benefits have been achieved over the Project's lifetime, as compared to the without-project scenario. These benefits will continue to be monitored and confirmed in future verification events.

4.6.4 High Conservation Values Protected (B2.4)

The PD and Monitoring Report state the principal threats to HCV biodiversity in the project zone come from illegal hunting of elephants and rhinos, overgrazing, and the frequent use of protected areas during droughts. Project activities increase game scout patrols, improve range for grazing, and reduce the need to use protected areas during droughts. Monitoring data shows there is a clear reversal in decreasing biodiversity trends from baseline to project scenario. Encroachment into Mathews Forest has been reduced.

The Verification Team confirms the assertions and precautions taken by the Project will assure the Project does not negatively affect any biodiversity-related HCVs.

4.6.5 Invasive Species (B2.5)

The Monitoring Report states that due to the project, no invasive species have been introduced into the project zone, nor have established invasive species spread through the project zone. Based on site visit observations and interviews, the Verification Team is assured no known invasive species have been introduced in the Project area and that the population of any existing invasive species will not increase as a result of project activities. This will continue to be confirmed in future verification events.

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

The Project is not attempting to utilize any non-native species in the project zone. Non-native species were not observed during the site visits. This aspect will continue to be confirmed in future verification events.

4.6.7 GMO Exclusion (B2.7)

The Project guarantees that no GMOs are used to generate GHG emissions reductions or removals. This aspect will continue to be confirmed in future verification events.

⁵ Glew L., Evaluating the effectiveness of community-based conservation in northern Kenya [Ph.D.]: University of Southampton; 2012

4.6.8 Inputs Justification (B2.8)

The PD and Monitoring Report confirm the Project will not use fertilizers, pesticides, biologic control agents, as the pastoralists do not traditionally import or have access to these chemicals. It is understood that finances are likely to limit the use of these additives, and the Project will continue to monitor this aspect over the life of the Project. The Verification Team did not observe the use of fertilizers, chemical pesticides, biological control agents, nor other inputs during the site visit. This aspect will continue to be confirmed in future verification events.

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

The PD referenced literature⁶ describing potential negative offsite biodiversity impacts outside the Project Zone. Further, a table in the PD describes potential unmitigated impacts on biodiversity outside the Project Zone and compares them to net positive biodiversity benefits in the with-project scenario. The off-site impacts are summarized as land degradation due to overgrazing and relative lack of wildlife protections off-site in comparison with the project area.

The Monitoring Report stated that the project has not uncovered any instances of negative offsite biodiversity impacts, and the efforts to reduce herder excursions off-site has likely reduced impacts. The Verification Team is assured the appropriate mitigation measures the project has undertaken will resolve any potential off-site impacts. This aspect will continue to be further confirmed in future verification events.

4.6.10 Net Offsite Biodiversity Benefits (B3.3)

The Monitoring Report has asserted that no explicit off-site biodiversity data was available, but due to the rapid expansion of six monitored trigger species on the project area, the project activities have likely increased biodiversity off-site.

The Verification Team generally agrees with this assertion and can confirm that off-site biodiversity benefits are expected to continue to improve over the life of the project.

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

The Monitoring Report states that biodiversity monitoring has occurred through wildlife counts by game scouts and through periodic sampling of indicator taxa. This is in accordance with the validated PD and was generally confirmed by the Verification Team during site visit interviews and observations.

4.6.12 Biodiversity Monitoring Plan Dissemination (B4.3)

The Verification Team noted the Project has not been communicated more recently due to high uncertainty in the carbon market and a reluctance to raise hopes about potential revenues. However, the conservancies began on 15 May 2015 with a solicitation of participation and a public comment period. This included an announcement and information about the project distributed by

⁶ Ogotu JO, Piepho HP, Said MY, Ojwang GO, Nijno LW, Kifugo SC, et al. Extreme wildlife declines and concurrent increase in livestock numbers in Kenya: what are the causes? Plos One. 2016;11:e0163249

NRT grazing coordinators and other staff in the form of pamphlets and an announcement on the NRT website (<http://nrt-kenya.org>). Further, the project held a large annual community meeting in September of 2016, discussing the project milestones to-date and planning for grazing during the next year.

The Verification Team reviewed these resources and required photographic evidence that project documentation had been distributed to local conservancies post-site visit.

These measures assure the Verification Team that the Project is taking action to disseminate and make public the biodiversity plan (contained within overall project documentation) to local communities, stakeholders and the general public.

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

Six trigger species were surveyed during monitoring events in accordance with the validated PD. All six species showed improvement in the with-project scenario (See Section 5.4.1 of the MONITORING REPORT for details). The Verification Team is assured that the project area contains indicators for trigger species, the project is monitoring according to the validated PD, and the project activities are leading to Gold Level trigger species population trends. These aspects will continue to be confirmed in future verification events.

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

Biodiversity is being monitored as described in Section 4.6.11 above. The Verification Team is assured the measures taken are effective at maintaining or enhancing the population status of trigger species.

4.7 Additional Project Implementation Information

Not applicable

4.8 Additional Project Impact Information

Not applicable

5 VERIFICATION CONCLUSION

After review of all project information, procedures, calculations, and supporting documentation, Aster Global Environmental Solutions, Inc., confirms that the monitoring conducted by the Project Proponent, along with the supporting Monitoring Report, are accurate and consistent with all aforementioned VCS criteria, the validated PD, and the selected methodology (VM0032). Aster Global confirms the *Northern Kenya Grassland Carbon Project Monitoring Report v 3.9*, dated 02 October 2020 has been implemented in accordance with the validated PD.

Aster Global confirms all verification activities including objectives, scope and criteria, level of assurance, monitoring and project documentation adherence to VCS (Version 4) and CCB Third Edition and all associated updates, as documented in this report, are complete. Aster Global concludes without any qualifications or limiting conditions the *Northern Kenya Grassland Carbon*

Project Monitoring Report v 3.9, dated 02 October 2020 meets the requirements of VCS and CCB for this monitoring period. In addition, Aster Global asserts that the project complies with the verification criteria for project set out in the Third Edition of the CCB Standards to achieve optional Climate Change Adaptation, Exceptional Community, and Exceptional Biodiversity Benefits.

The GHG assertion provided by Northern Rangelands Trust and verified by Aster Global has resulted in the GHG emissions reduction or removal of 3,822,118 tCO₂ equivalents by the project during the verification period/reporting period (01 January 2013 – 31 December 2016; 4 years). This value is gross of the 16% (611,539 tCO₂ equivalents) buffer withholding based on the non-permanence risk assessment tool. This results in 3,210,579 tCO₂ equivalents of credits eligible for issuance as VCUs.

Monitoring period: 01 January 2013 to 31 December 2016

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

Year	Baseline emissions or removals (tCO ₂ e)	Project emissions or removals (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Net GHG emission reductions or removals (Rt, tCO ₂ e)	Deductions for AFOLU Pooled Buffer Account	Net GHG emission reductions or removals, VCUs (tCO ₂ e)*
2013	140,973	179,727	1,287	27,506	4,401	23,105
2014	140,973	179,727	307,123	1,364,849	218,376	1,146,473
2015	140,973	179,727	392,551	1,013,359	162,137	851,222
2016	140,973	179,727	170,997	1,416,404	226,625	1,189,779
Total	563,892	718,908	871,958	3,822,118	611,539	3,210,579

CCB CRITERIA CHECKLIST:

GENERAL SECTION

CONFORMANCE

G1. Project Goals, Design & Long-Term Viability (Required)	YES ☒ NO ☐ N/A ☐
G2. Without-Project Land Use Scenario & Additionality (Required)	YES ☒ NO ☐ N/A ☐
G3. Stakeholder Engagement (Required)	YES ☒ NO ☐ N/A ☐
G4. Management Capacity (Required)	YES ☒ NO ☐ N/A ☐
G5. Legal Status and Property Rights (Required)	YES ☒ NO ☐ N/A ☐

CLIMATE SECTION

CL1. Without-Project Climate Scenario (Required) YES ☒ NO ☐ N/A ☐
 CL2. Net Positive Climate Impacts (Required) YES ☒ NO ☐ N/A ☐
 CL3. Offsite Climate Impacts (Required) YES ☒ NO ☐ N/A ☐
 CL4. Climate Impact Monitoring (Required) YES ☒ NO ☐ N/A ☐
 CL5. Climate Impact Adaptation (Optional) YES ☒ NO ☐ N/A ☐

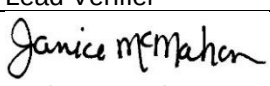
COMMUNITY SECTION

CM1. Without-Project Scenario for Communities (Required) YES ☒ NO ☐ N/A ☐
 CM2. Net Positive Community Impacts (Required) YES ☒ NO ☐ N/A ☐
 CM3. Offsite Stakeholder Impacts (Required) YES ☒ NO ☐ N/A ☐
 CM4. Community Impact Monitoring (Required) YES ☒ NO ☐ N/A ☐
 GL5. Exceptional Community Benefits (Optional) YES ☒ NO ☐ N/A ☐

BIODIVERSITY SECTION

B1. Without-Project Biodiversity Scenario (Required) YES ☒ NO ☐ N/A ☐
 B2. Net Positive Biodiversity Impacts (Required) YES ☒ NO ☐ N/A ☐
 B3. Offsite Biodiversity Impacts (Required) YES ☒ NO ☐ N/A ☐
 B4. Biodiversity Impact Monitoring (Required) YES ☒ NO ☐ N/A ☐
 GL3. Exceptional Biodiversity Benefits (Optional) YES ☒ NO ☐ N/A ☐

Submittal Information

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Report Submitted by:	Aster Global Environmental Solutions, Inc. 3800 Clermont St. NW North Lawrence, OH 44666
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Aster Global President Name and Signature	 Janice McMahon President
Date:	20 November 2020

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APPENDIX A: VCS NCRS/CLS/OFI SUMMARY

Approved VCS Methodology VM0032 Version 1 - 16 July 2015 Sectoral Scope 14 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing (Section)	4. APPLICABILITY CONDITIONS
Approved VCS Methodology VM0032 Version 1 - 16 July 2015 Sectoral Scope 14 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing (Description)	3. The project must be structured to keep livestock within the project area, and the project proponent must be able to enforce the boundaries of the project area.
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents)	MR
Aster Findings Round 1	- This element was confirmed during validation and a forward action request (FAR) was applied. The FAR noted that the management structure of the grazing agreement in conjunction with on the ground enforcement from grazing coordinators would ensure project boundaries were effectively maintained. It is unclear how the FAR has been satisfied for the current verification period.
Round 1 NCR/CL/OFI	1 CL: Please clarify how the applicability condition was met for the current reporting period, addressing how both incursions and excursions were prevented.
Round 1 Response from Project Proponent	A narrative description addressing the question of enforceable project boundaries was added to Section 6 of the Monitoring Report (Additional Project Implementation Information)
Aster Findings Round 2	- The audit reviewed the updated MR Section 6 and based on on-site observation and discussions with the project proponent along with the current implementation of the adaptive management plan confirm that the approach described is in line with the requirements of the applicability conditions. The item has been addressed.

Approved Methodology VM0032 Version 1 - 16 July 2015 Sectoral Scope 14 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing (Section)	VCS 8.2.1 Project Methane Emissions from Grazing Animals (PEMt)
Approved Methodology VM0032 Version 1 - 16 July 2015 Sectoral Scope 14 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing (Description)	However, whether or not methane emissions from livestock are reduced, calculations must be based on project data from animal counts or censuses and emission factor data based on project area-applicable body weight of each category from the equations in Table 4? and Equation (1) (Section 8.1.3.1). (See equation 8 on page 31 of the methodology for calculation of: Project emissions of CH₄ from grazing animals at year t (tCO₂e)) - page 31
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents)	MR; Emissions Worksheet
Aster Findings Round 1	The calculation of PEMt was confirmed to follow the methodology. The audit team notes that all conservancies within the project area were sourced for animal count data. Given that no physical boundaries negate the incursion of animals from off of the project area it is unclear how these animals were estimated and appropriately accounted for in the computation of PEMt.
Round 1 NCR/CL/OFI	CL: Please clarify how the computation of PEMt accounts for any incursion from animals not surveyed in the conservancy lands that may have been excluded from project emission estimates.
Round 1 Response from Project Proponent	Incursions of off-project livestock onto the project area were documented and quantified using monthly grazing reports and an encroachment decision tree. Methane emissions for these encroachment-days were calculated using a modified version of Equation 8 from VM0032 and determined to be "de-minimis" (<5% of net emissions and removals). Encroachment methane emissions therefore remain unaccounted for in the project's final calculation of net emissions and removals. See Section 3.2.2 of the Monitoring Report for further details as well as the spreadsheets 'Leakage and Encroachment Verification Calculations 2013-2016 Aug2020.xlsx' and 'NKCP Methane Calculations 2013-2016 v5.xlsx' for all calculations.

Aster Findings Round 2	- The audit team consulted with verra about animal incursions as specific guidance is not within the methodology. Based on verra guidance it was stated that if grazing incursions were less the 5% they could be excluded from the computaion of PEMt. The audit team reviewed the incursion decision tree. It was noted that there is no path within the decision tree to get to item 4. A review of the implementation of the decision tree noted a number of discrepancies where it is unclear how values reported are in line with the written approach defined in the monitoring report. The audit team reviewed the de-minimis demonstration performed in the "NKCP Methane Calculations 2013-2016 v5.xlsx" file. It was noted that the demonstration was not done on an annual basis, as this pool fluctuates annually and is credited on that level. Further, de-minimis demonstration was done in comparison to the total GHG credits for the project, rather than at a source level.
Round 2 NCR /CL/OFI	2 CL: Please clarify how the decision tree as written is appropriate for the recordation of all records, while ensuring that all steps can and were followed. CL: Please clarify how the de-minimis demonstration performed is in line with annual based de-minimis demonstration as specified within the VCS Standard. Further, please demonstrate that the de-minimis demonstration is appropriately computed, in line with the audit team finding.
Round 2 Response from Project Proponent	The encroachment decision tree has been revised so that all numbered items within it can be reached. Additionally, a new column 'DT Branch' has been added to the 'Encroachment Records' tab of the Leakage and Encroachment Verification Calculations spreadsheet that references the specific branch of the decision tree reached and used to calculate encroachment for the report in question. The de-minimus demonstration is now applied annually in the tab 'NRT Methane Encroachment' within the Methane Calculations spreadsheet. Without specific guidance for this circumstance from the VCS Standard, encroachment methane emissions are shown to be de-minimus relative to mean annual project methane emissions. This approach follows the methods outlined by the CDM 'Tool for testing significance of GHG emissions in A/R CDM project activities' but compares the pool of encroachment methane emissions to only project methane emissions (and not also leakage emissions).
Aster Findings Round 3	- The animal incursion decision tree was re-reviewed in response to the finding. This decision tree allows the reader of the grazing reports to approximate animal counts in order to account for non-project related emissions from animal methane. The decision tree was revamped to now allow for all steps to be reached and is reasonably clear to count animals consistently as observed from the grazing reports. The results of the animal incursion decision tree indicated that animal methane emissions not attributed to the project-case (i.e. from outside the project area) can be rendered de minimis. As noted in this audit, animal incursions do happen but they are low in frequency and magnitude as compared to the project-case. The de minimis analysis was found to follow the VCS approved T-SIG tool and no action is required by project proponents. The item is addressed. A Forward Action Request (FAR) is issued to ensure future verifiers check for the presence of animal incursions and to evaluate their potential as a significant source of emissions to be included in emission reduction estimates.

Approved Methodology VM0032 Version 1 - 16 July 2015 Sectoral Scope 14 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing (Section)	VCS 8.3.1.1 Leakage emissions from displaced livestock.
Approved Methodology VM0032 Version 1 - 16 July 2015 Sectoral Scope 14 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing (Description)	The penalty approach is a more conservative option (leakage calculations will likely be larger) but no monitoring of soils and/or vegetation outside the project area is required and off-project area use of grasslands, croplands, and forests is not differentiated. In this case, displacement leakage (LDt) must be calculated as a proportion of net removals from increased soil carbon in year t (PRSt), based on the proportion of total project livestock-days in project year t, $365 \times \text{PNc,t}$, that occurred outside the project area. <i>(See equation 17 on page 37 of the methodology for calculation of: Leakage emissions from displaced livestock (tCO2e))</i>
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents)	MR; Leakage calculations worksheet,
Aster Findings Round 1	The audit team reviewed the leakage workbook "Leakage Verification Calculations 2013-2016.xlsx". It was noted in review that values for the Naibunga conservancy in 2014, differed from previous submittals. It is unclear how these values are appropriate. Further, the audit team noted that "on project" and "off project" values presented remain unchanged from previous iterations submitted to the audit team. The audit team notes that the project area has changed since those previous submissions in the course of PD validation, and it is unclear whether those areas removed from the project area (e.g. Lekkurki conservancy) have been appropriately accounted for as off-project area in the computations for leakage.
Round NCR/CL/OFI	1 CL: Please clarify why the values for Naibunga have changed for 2014 in the most recent leakage computations. Further, please update dependent computations, in line with any changes. CL: Please clarify how the values presented for "on project" and "off project" are in line the validated project area in determination of leakage, as validated in the PD and addressed in the audit team finding. Further, please update dependent computations and documentation, in line with any changes that might be made to address this finding.

Round 1 Response from Project Proponent	Livestock numbers for Naibunga in 2014 were eliminated from leakage calculations to reflect the fact that Naibunga conservancy did not join the project until 2015 (Tables 1 and 3 of MR). Previous versions of the leakage workbook with these values included were erroneous. Values in the current MR will be left unchanged and all downstream calculations are unaffected. Leakage calculations have been updated to account for all livestock that moved onto Lekurukki conservancy (off-project) from the project area. The only project livestock to enter Lekurukki come from Oldonyiro, which joined the project in 2014. Leakage calculations have therefore been updated only for Oldonyiro from 2014-2016. The small resulting increase in leakage emissions is now accounted for in the "Net Emissions and Removals" tab of the workbook "NKCP Verification Calculations 2013-2016 v2 June2020.xlsx" and summarized in Table 4 of the MR.
Aster Findings Round 2	The livestock leakage values for Naibunga were confirmed to have appropriately omitted the year 2014 from calculations in line with the proponents response. The updated leakage calculations were reviewed where Oldonyiro/Mpus Kutuk was noted to have been updated. The audit team was unable to confirm the June 2016 updates for Oldonyiro, the totals for shoats do not rectify with the rest of the worksheet. Further, after examining other livestock maps the audit team was unable to confirm the source for specific numeric values applied for given months, for instance January 2015. It is unclear where the data comes from where there wasn't any reported values to transcribe over. We also noticed trends on the maps for Oldonyiro that appeared in the maps but are not reflected in the worksheet. This last element has been discussed with project proponents on call as they continue to address the previous finding.
Round 2 NCR /CL/OFI	2
Round 2 Response from Project Proponent	Hi all, In response to Eric's questions The original grazing reports I thought were available to AG through SftF dropbox storage, but here is the link again https://www.dropbox.com/sh/qmaf3k8kbzt9i/AABsMqCkixamUSNauZ4xKKLpa?dl=0 The relevant path to the files is NRT Grazing Reports/Year/Mpus Kutuk. Mpus Kutuk was renamed Oldonyiro in 2018. Due to the geography of the region and the presence of the Mukugodo Muntains west of Il Ngwesi and Lekurruki, the only participating Conservancy that moves livestock onto Lekurruki is Oldonyiro. Leparua and Kalama always send livestock east to Nasuulu, Nakuprat-Gotu and then to Sera or southwest directly through Il Ngwesi to Laikipia. Naibunga moves livestock directly south into Laikipia or northward into Oldonyiro and then further west. Meibae livestock either move east through Namunyak and Westgate through passes in the Mathews Range into Sera. Il Ngwesi moves livestock west into the Mukugodo Forest or south into Laikipia. Oldonyiro livestock moves through Lekurruki usually to reach Laikipia, or into Leparua or Westgate on their way to southern Sera Conservancy. Jacob can add this description of leakage movement pathways to the MR.
Aster Findings Round 3	The element has been discussed with project proponents on a call as they continue to address the previous finding. Pending further anticipated updates.
Round 3 NCR /CL/OFI	3

Round 3 Response from Project Proponent	We have updated our methods for interpreting the oftentimes ambiguous grazing reports to ensure that they are replicable. Please refer to Section 3.2.2 of the Monitoring Report for a summary of these methods and to the new Excel workbook 'Leakage and Encroachment Verification Calculations 2013-2016 Aug2020.xlsx' for all calculations. Also note that Northern Rangelands Trust, the Kenya-based project proponent, has since located 170 previously missing grazing reports. All grazing reports for the current monitoring period have now been shared with Aster in the Google Drive folder "Conservancy Grazing Reports 2013-2016".
Aster Findings Round 4	The audit team has reviewed the updated grazing reports, 'Leakage and Encroachment Verification Calculations 2013-2016 Aug2020.xlsx' and decision tree in the monitoring report. The audit team noted that the provided decision tree deviated significantly from previous drafts provided to the audit team. It was noted that the methodology does not include sufficient detail for missing reports and how they are to be handled. Review indicated that while the methodology may have symbols they were not always used in totality. Similarly, the audit team noted that written narratives appear to be used for some leakage estimates, but no similar language exists within the decision tree, with the exception of when all animals are reported within the conservancy. It is unclear how this is appropriate. The animal counts did not match independently assessed auditor counts for a number of the ratios applied. It is unclear how the markings on the grazing reports scale up to represent the total numbers in the reports, especially when the number on the page differ from month to month, but they are assumed to be static in the leakage report.
Round NCR /CL/OFI	4 CL: Please address the audit team findings. In doing so, please clarify how the decision tree methodology is appropriate and complete. Further, please clarify how discrepancies noted by verifiers are in line with the application of decision tree methodology, as described in the monitoring report. Please confirm that all conservancy leakage values are determined in line with the approaches defined in the decision tree.

Round 4 Response from Project Proponent	The decision tree methodology has been updated to be as explicit as possible. The tree was revised to account, by our estimation following review of all grazing reports, for all the possible ways that grazing reports can be used to determine leakage. Our revised approach de-emphasizes reports of livestock numbers, which conflicts between low reported numbers and narratives that "all livestock are on the Conservancy," reveal to be underestimates. This bias likely results from grazing coordinators being unable to count all livestock due to the inaccessibility of livestock locations. The revised decision tree allows leakage to be accounted from reports with narrative, narrative + graphic information about livestock locations on or off the Conservancy (livestock symbols and arrows to indicate movement), or only graphic information. Other options included are lists of livestock locations, including those off the project area, for reports that with reported livestock numbers or reports that do not include livestock numbers. The new decision tree was applied to every report in the database, with accompanying revisions to reported leakage. To further assist review, a new column has been added to each conservancy's Grazing Report spreadsheet, DT Branch, that references the specific branch of the decision tree used to determine leakage. The adjacent 'Notes' column specifically explains how the grazing report was interpreted according to the referenced DT Branch. Note that unless camels or donkeys were specifically mentioned on a grazing report, "shoats" and "small stock" were assumed to represent shoats, camels, and donkeys. This assumption is supported by the following. (1) Donkeys were seldom represented by graphic symbols, but reported numbers of donkeys were highly correlated with reported numbers of camels across different grazing blocks or communities within Conservancies, so donkeys were assumed to be herded with camels. (2) Frequent reports revealed that cattle were herded in different locations from other livestock and that shoats, camels, and donkeys often remained together at home bomas months after cattle had left the Conservancy. (3) Graphic symbolic depictions of livestock locations that did distinguish shoats, camels and donkeys usually showed these livestock classes grouped together. In reports that showed camels herded separately from shoats, camel (and donkey) locations were accounted separately from shoats.
Aster Round 5 Findings	The audit team re-reviewed the newly submitted and revised decision trees for the step-wise evaluation of leakage and encroachment using grazing reports. Sufficient detail has been included for handling missing reports, symbols and arrows, and interpretatino guidelines for certain written language. The audit team recognizes the difficulty in deciphering grazing reports from all the conservancies due to their inconsistent reporting methods. However the audit team found that the decisions trees are able to sufficiently interpret the grazing reports in a consistent manner for animal counts on/off a conservancy and whether or not animal encroachment outside the conservancy is happening. The item is addressed. Due to the difficulty in applying a consistent, conservative, and replicable method to evaluate grazing reports, the audit team suggests project proponents consider improvements to the grazing reports themselves. A Forward Action Request (FAR) has been included in the verification report to ensure future verifiers consider the importance of the interpretation of grazing reports and their contribution to the determination of leakage.

Approved Methodology VM0032 Version 1 - 16 July 2015 Sectoral Scope 14 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing (Section)	VCS 8.4. Net GHG Emission Reduction and Removals
Approved Methodology VM0032 Version 1 - 16 July 2015 Sectoral Scope 14 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing (Description)	The estimation of net project emission reductions, PERT, and net change in carbon stocks, NCCSt, each year of the monitoring period is calculated using the following equation: (see equation 19 on page 38 of the methodology for calculation of: Net project emission reductions in year t (tCO_2e))
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents)	MR Section Table 4, NRT calculation Worksheet
Aster Findings Round 1	The audit team examined Table 4 within the MR. The audit team noted that values within Table 4 for "Project emissions or removals" do not appear to be in line with values computed in Net Emissions and Removals tab of the "NKCP Verification Calculations 2013-2016 v1.xlsx" file. It is unclear where these values are computed.
Round NCR/CL/OFI	1 CL: Please clarify where the values for the column "Project Emissions or Removals" for Table 4 of the MR are computed. Further, please ensure that values are consistent with computed values.
Round 1 Response from Project Proponent	It is unclear to the project proponent how best to calculate "Project emissions or removals" as required by Table 4 in the MR template when both emissions and removals are accounted for in VM0032. The original values in Table 4 were calculated from the Net Emissions and Removals tab as the difference between Project Emissions (PEMt) and Net Change in Carbon Stocks (NCCSt) to reconcile the balance between emissions and removals. Since the audit team has noted that the source of these values is unclear, Table 4 has been modified to distinguish between "Project emissions" and "Project removals". Net GHG emission reductions and removals remain the same (disregarding the above adjustment of leakage).

Aster Findings Round 2	- This calculation was confirmed. The item is addressed.
Approved VCS Methodology VM0032 Version 1 - 16 July 2015 Sectoral Scope 14 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing (Section)	9.2 Data and Parameters Monitored
Approved VCS Methodology VM0032 Version 1 - 16 July 2015 Sectoral Scope 14 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing (Description)	PAm,t
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents)	MR
Aster Findings Round 1	- The audit team was unable to locate the parameter PAm,t within the monitoring report.
Round NCR/CL/OFI	1 CL: Please include the parameter PAm,t in the monitoring report, in line with the validated PD.
Round 1 Response from Project Proponent	Parameter PAm,t has been added to Section 3.1.2 of the MR to match the validated PD
Aster Findings Round 2	- This parameter was confirmed appropriately added. The item is addressed.

Approved Methodology VM0032 Version 1 - 16 July 2015 Sectoral Scope 14 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing (Section)	VCS 9.2.6 Parameters for Leakage
Approved Methodology VM0032 Version 1 - 16 July 2015 Sectoral Scope 14 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing (Description)	DNC,x, or Number of livestock of each category c that were outside the project area (outside the fence defining the boundary of the project area, or, in the case of open grazing lands eg pastoralist areas, beyond 2 km from the mapped project area boundary on day x
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents)	MR
Aster Findings Round 1	- The audit team was unable to locate the parameter DNC,x within the monitoring report.
Round NCR/CL/OFI	1 CL: Please include the parameter DNC,x in the monitoring report, in line with the validated PD.
Round 1 Response from Project Proponent	Parameter DNC,x has been added to Section 3.1.2 of the MR to match the validated PD
Aster Findings Round 2	- This parameter was confirmed appropriately added. The item is addressed.

Approved Methodology VM0032 Version 1 - 16 July 2015 Sectoral Scope 14 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing (Section)	VCS 9.2.6 Parameters for Leakage
Approved Methodology VM0032 Version 1 - 16 July 2015 Sectoral Scope 14 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing (Description)	d, or Total number of days livestock were off the project area
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents)	MR
Aster Findings Round 1	- The audit team was unable to locate the parameter d within the monitoring report.
Round 1 NCR/CL/OFI	1 CL: Please include the parameter d in the monitoring report, in line with the validated PD.
Round 1 Response from Project Proponent	Parameter d has been added to Section 3.1.2 of the MR to match the validated PD
Aster Findings Round 2	- This parameter was confirmed appropriately added. The item is addressed.

APPENDIX B: DOCUMENTS RECEIVED/REVIEWED

Use appendices for supporting information. Delete this appendix (title and instructions) where no appendix is required.