

NORTHERN KENYA GRASSLAND CARBON PROJECT 2017-2020 VERIFICATION REPORT



RUBY CANYON ENVIRONMENTAL

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Summary

Native, a Public Benefit Corporation (Native) contracted Ruby Canyon Environmental, Inc. (RCE) to complete the verification of the CCB Northern Kenya Grassland Carbon Project located on 13 wildlife conservancies organized under an NGO called the Northern Rangelands Trust (NRT) for the reporting period from 01 January 2017 to 31 December 2020. The Project utilizes VM0032 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing.

The Northern Kenya Grassland Carbon Project (Project) is an agricultural land management (ALM) project that removes greenhouse carbon dioxide (CO₂) from the atmosphere by implementing sustainable new grazing management over two million hectares in northern Kenya savannas and grasslands. The project also monitors net methane (CH₄) emissions from livestock activities. Project activities incorporated planned rotational grazing in ways that sequester soil carbon, improve soil quality to retain precipitation, reduce strife amongst neighboring pastoralist tribes and benefit native people in the region.

The goal of this GHG emissions inventory verification is to ensure that the GHG assertion is materially correct, that the data provided to the verification team can be documented and if errors or omissions are detected, they be corrected. The scope of the verification included the assessment of the Project Description (PD), the Monitoring Report and supporting data and documentation against the requirements of the VCS Program Guide, Version 4.0 and the VCS Standard, Version 4.1, CCB Standard and Rules v. 2.0, as well as the project methodology, VM0032 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing, version 1.0 (Methodology) including associated tools.

The verification audit was performed through a combination of document review, interviews with relevant personnel and on-site inspections. During the verification process, the verification team issued two rounds of findings including 3 Corrective Action Requests, 1 Non-material Finding, 6 additional documentation requests and 8 clarification requests. The findings are included as Appendix A. The verification team concludes, to a reasonable level of assurance, that the Project correctly applies the Methodology with noted deviations. The verification team confirms, to a reasonable level of assurance, that the Project's assertion for the reporting period of 1 January 2017 to 31 December 2020, is 4,179,523 tCO₂e net emission reductions, which after applying discounts corresponds to 3,552,595 claimable VCUs.

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1. INTRODUCTION

1.1 Objective

The purpose of the verification is to determine whether the Project complies with the verification criteria, as set out in the criteria documents listed in Section 1.2 of this report, and to ensure that the GHG assertion is materially correct, that the data provided to the verification team can be documented and if errors or omissions are detected, they be corrected by Native.

1.2 Scope and Criteria

This is the verification for the second reporting period from 1 January 2017 to 31 December 2020. The verification scope includes the organizational boundaries of the Project and all associated processes. The GHG emission sources, sinks and reservoirs include soil organic carbon (SOC) and enteric fermentation from livestock. CO₂ and CH₄ are the only GHGs included in the scope of the Project. The verification team conducted the verification based on the following criteria:

- VCS Standard v4.1, 22 April 2021,
- VCS Program Guide, v4.0, 19 September 2019,
- Climate, Community, and Biodiversity (CCB) Standards, v3.1, 21 June 2017,
- CCB Program Definitions, v3.0, 21 June 2017,
- VM0032: Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing, v1.0, 16 July 2015
- AFOLU Non-Permanence Risk Tool, v4.0, 19 September 2019
- VCS Validation and Verification Manual, v3.2, 19 October 2016
- Validated CCB & VCS PD v6.0, 28 April 2020,
- VCS Monitoring Report, Northern Kenya Grassland Carbon Project, v1.13, 30 August 2023
- ISO 14064-3:2006 “Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions”

1.3 Level of Assurance

RCE conducted the verification to a reasonable level of assurance.

1.4 Summary Description of the Project

The main project activity is widespread successful implementation of planned rotational grazing within the Project’s 13 conservancies across 1,993,075 hectares of savanna grassland. Conservancies are groups of communities that occupy designated Group Ranch lands or Trust

lands. Historical over-grazing has depleted soils of organic matter, reduced perennial vegetation and caused conflict among the communities. The project activities of increased rotational grazing patterns help recover perennial grasses which in turn increases carbon storage in the soil.

The project is operated with NRT on 13 conservancies (Biliqo, Il Ngwesi, Kalama, Leparua, Meibae, Melako, Oldonyiro, Naibunga, Nakuprat-Gotu, Namunyak, Nasuulu, Sera, and Westgate) located in Northern Kenya. A 14th conservancy, Lekurruki, is not included in carbon removal claims but is included in project activities. The Project Start Date corresponds to the NRT/Nature Conservancy charter initiated on 10 December 2012 which corresponded to the initiation of yearly migration grazing plans for the Il Ngwesi, Kalama, Lekurruki and Westgate conservancies. NRT and the Nature Conservancy also signed a joint MOU for administering monies to implement the project.

2. VERIFICATION PROCESS

RCE used a risk-based approach to assess the Project against the VCS Program rules and CCB requirements including the criteria defined in Section 1.2 of this document.

The verification process included the following independent and objective activities:

- Select a verification team,
- Perform an internal conflict of interest (COI) review,
- Conduct a kick-off meeting with Native to introduce the RCE team, review the verification objectives, process, VCS requirements, and to confirm the schedule.
- Review the Monitoring Report against the requirements of the VCS Standard and CCB,
- Develop a verification plan and sampling plan,
- Review the documents associated with the monitoring period for which emission reductions were issued,
- Conduct a site visit,
- Review the accuracy of the emission reductions for the reporting period,
- Issue corrective action requests (CARs), additional documentation requests (ADRs), and clarification requests (CRs), as necessary,
- Conduct an independent review
- Issue a Verification Report, and
- Conduct an exit meeting with Native.

2.1 Audit Team Composition (Rules 4.3.1)

The verification team was selected according to RCE's GHG Verification Policies & Procedures to ensure team members are qualified to perform verification activities pertaining to the Project. The team consisted of the following individuals:

Lead Verifier: Phillip Cunningham

Phillip is an approved lead verifier for landfills, livestock, ozone depleting substances, coal mine methane, nitric acid production, organic waste digestion, organic waste composting, nitrogen management, and grasslands under the Climate Action Reserve; an Air Resources Board (ARB)-accredited lead verifier for Livestock, Ozone-depleting Substances, and coal mine methane project verifications, as well as a lead verifier under the ARB's mandatory reporting program. He has worked as a lead verifier under The Climate Registry verifying greenhouse gas (GHG) emission inventories for local governments, universities, a transportation company, utility companies, and a variety of other industry sectors. In Canada, it has acted as a lead verifier for carbon offset projects and emissions inventories under the Columbia Climate Investment Division and British Columbia Reporting Regulations, verified carbon offset projects under the Alberta carbon registry and verified several facilities under Ontario's mandatory reporting regulation. He has also verified power plants and a variety of manufacturing plants and industrial facilities reporting under the National Emissions Registry (RENE) in Mexico.

Independent reviewer: Zach Eyler

As Vice President, Zach oversees RCE's work throughout North America utilizing more than a decade of experience in GHG programs and markets. Zach is a lead verifier for multiple GHG programs, including California Air Resources Board (CARB), Climate Action Reserve (CAR), American Carbon Registry (ACR), The Climate Registry (TCR), Verified Carbon Standard (VCS), National Registry of Emissions (RENE), and British Columbia's Climate Investment Branch. Zach has years of experience in methane offset projects from coal mines, landfills, livestock, oil/gas, fuel switching, transportation, ODS, and nitric acid production. Zach leads RCE's work in California for the Low Carbon Fuel Standard and Compliance Offset Program and represents RCE on a variety of working groups with the International Association for Commercial Emissions.

Team members including technical experts: Nina Pinette, Masury Lynch, Angelica Villegas, Andrew Russo, and Lara Hughes-Allen

Team members include RCE personnel with experience in verification of Greenhouse Gases Emissions Inventories in the Energy, Commerce and Services, Waste and Transport sectors, as well as verification of mitigation projects in the forestry sector in México, Perú, Colombia and Brazil, including A/R and REDD+ projects under different programs and registries (VCS+CCB, CAR, CERCARBONO) and using different methodologies. The team also has experience and skills in data analysis, imagery processing and geographic information systems, sampling design and forest inventory surveys.

2.2 Method and Criteria

The verification team performed a review of the validated Project Description (PD) dated 28 April 2020, monitoring report dated 19 August 2022 for the second reporting period (01 January 2017 – 31 December 2020), and all supporting information and documents against VCS Version 4 and

CCB Version 3. The verification team developed a sampling plan in order to identify inherent and control risks associated with the Project.

The review included re-calculating emission reductions from the successful implementation of the project activities by reviewing a NDVI analysis of time-lapsed pixels prior to and after planned grazing. The verification team's analysis included multiple spreadsheets that tracked proportion of successful project activities through NDVI analysis, emissions from leakage, methane emissions from livestock, geographic information used for the GIS analysis, and other documents showing successful implementation of the project activities. The verification team also confirmed methods for monitoring CCB requirements as described below in applicable sections.

Nina Pinette and Phillip Cunningham performed a site visit to the project location in Northern Kenya in order to verify successful project implementation. The team issued two rounds of findings and NRT/Native provided sufficient responses to all findings. After all findings were resolved, Zach Eyster performed an independent review of the audit. RCE completed a combined CCB & VCS Verification Report provided to Verra/VCS and the client.

2.3 Document Review The verification team audited the Project's PD, the Monitoring Report for the second reporting period, CCB supporting documents to demonstrate compliance with all relevant CCB criteria and data used to calculate emission reductions. RCE cross-checked surveys, meeting minutes, and stakeholder engagement to confirm that NRT fulfilled CCB requirements. The team also cross-checked baseline and project emission calculations by reviewing source data including NDVI analysis of successful grazing implementation and default emission factors.

RCE reviewed the inputs to the AFOLU Non-Permanence Risk Tool (Risk Report Calculation Tool: VCS Version 4) for determining the number of credits deposited into the AFOLU pooled buffer account. All fields were filled out correctly and Native justified chosen risk values where appropriate.

RCE also reviewed monitoring documents to confirm conformance with VM0032 and associated tools. All documents reviewed are listed in Appendix A.

2.4 Interviews

During the site visit from March 28 – 31, 2022 and desktop sampling, the verification team performed multiple interviews with project personnel who provided information regarding the validated PD, monitoring report, and supporting documents. As part of the CCB verification, the verification team also interviewed conservancy managers, conservancy committee members (e.g., grazing chairman, vice chairman, other chairs), conservancy board members, and general members of the conservancies (who did not hold positions on conservancy boards, management, etc.).

The verification team did not interview members of communities or conservancies outside of the project area as it was deemed not relevant to project activities and the verification of this monitoring period. The entire project area is made up of the 13 conservancies included in the Project. All communities and community members participating in project activities are part of one of the 13 conservancies. As discussed in section 4.3.3 of the PD "at least some conserved grazing land will be shared with offsite stakeholders in order to control livestock movements and provide agreements

to move offsite when forage is available only off the project area”; however, the project benefits are intended to be only for the members of the conservancies within the project area. The verification team’s assessment of communication of project design and distribution of benefits focused on members of the conservancies within the project area who are the people responsible for implementing and following grazing plans and are benefitting from the implementation of project activities.

General Interviews

- Kirsten McKnight, Project Director, Native – participated in the verification kick-off meeting, discussed site visit logistics, overall project activities, and evidence required to confirm CCB requirements.
- Kyle O’Keefe, Asset Management Analyst, Native – participated in the verification kick-off meeting, discussed site visit logistics, project activities, calculations, GIS data, sampling methods and QA/QC monitoring for the Project.

Project QA/QC and on-site interviews for soil sampling

- Kyle O’Keefe, Asset Management Analyst, Native – participated in the site visit, discussed QA/QC monitoring for soil sampling, NDVI analysis, grazing reports, leakage assessment, GIS data and other items listed in the monitoring report
- Jackson Kikardi Surianka, Field Operations Manager and Director of Project Development, Kenya, Soils for the Future – participated in site visit, discussed soil sampling methods, QA/QC for collecting, labeling, transporting and analyzing soil samples.
- Francis Kipees, Field Assistant, Soils for the Future – participated in site visit, discussed soil sampling methods, QA/QC for collecting, labeling, transporting and analyzing soil samples.
- Mohamed Shibia, NRT Rangelands Strategy and Policy Director, NRT – participated in site visit, discussed grazing reports including methods for gathering information on leakage emissions (confirming off-project land livestock days), overall measurement of successful implementation of rotational grazing, and other information related to measuring and monitoring successful grazing plans.

CCB Interviews

- Priscilla Lalampaa, Rangeland Project Coordinator, NRT – is the project manager and coordinated site visit activities related to the CCB portion of the verification. Discussed role as the manager and interactions with conservancies and various groups to obtain necessary data relevant to the Project’s climate, community, and biodiversity benefits.
- Mark Olivah, Monitoring Evaluation Manager, NRT—is responsible for monitoring various aspects of the Project including social, vegetation, wildlife, and biodiversity benefits. Discussed the methods used to monitor the Project’s impacts.

- Antony Wandera, Senior Research and Monitoring Officer, NRT—coordinates wildlife research and monitoring in the Project area. Discussed partnership with other agencies conducting wildlife research and NRT’s role in the conservancies as it relates to wildlife.
- Isa Gedi, Director of Governance and Capacity Building, NRT—ensures measures are in place to support governance. Discussed the governance structures in the project conservancies and roles related to the Project.
- Samuel Lekimaroro, Head of Peace and Security, NRT and William Lekadaa, Peace Department, NRT—discussed the role of peace and security as it relates to the Project including work with conservancies to educate and advise communities on livestock movement in order to reduce conflicts.
- Jessica Chaplin, Head of Special Projects, NRT and Kieran Avery, Director of Natural Resource Management, NRT—discussed history of the Project and successes and challenges throughout the Project thus far.
- Peter Lalampaa, Director of Programs, Grevy’s Zebra Trust—discussed Grevy’s Zebra Trust’s role in project activities and partnerships with NRT and other organizations involved in the Project.
- Kalama Conservancy: Burton Lenanyokie, Regional Director, NRT Central; Michael Lesiamito, Chairperson, Kalama Conservancy; Michael Lesachore, Grazing Chairman, Kalama Conservancy; Sambara Lengamunyak, Vice Chairman, Kalama Conservancy; Janet Akiru Loldepe, Tourism Chairperson, Kalama Conservancy; Lerosi Lekilivai, Community Member, Kalama Conservancy; Nabiki Lesupes, Board Member, Kalama Conservancy—discussed knowledge and impact of the Project on the conservancy and members of the community in general, participation in project activities, and whether the Project is achieving its climate, community, and biodiversity goals.
- Westgate Conservancy: Alex Lekalaile, Rangeland Coordinator, Westgate Conservancy; David Lotoimie, Grazing Chairman, Westgate Conservancy; Chris Lekupe, Manager, Westgate Conservancy; and other members of Westgate Conservancy—discussed knowledge and impact of the Project on the conservancy and members of the community in general, participation in project activities, and whether the Project is achieving its climate, community, and biodiversity goals.
- Melako Conservancy: Bathi Francis, Rangeland Coordinator; Ngasupat Alyaro, Board Member; Antonino Kaldalle, Community Elder; Aloyce Gonzaga, Marsabit Conservancies Director, NRT; and other members of Melako Conservancy—discussed knowledge and impact of the Project on the conservancy and members of the community in general, participation in project activities, and whether the Project is achieving its climate, community, and biodiversity goals.

2.5 Site Inspections

Verification team members Phillip Cunningham and Nina Pinette conducted an onsite visit to the Project area from March 28 to 31, 2022. The site visits included two objectives: 1) to resample soil

organic carbon plots for the future 2021 reporting period and 2) to evaluate project impacts on climate, community, and biodiversity by conducting interviews with project stakeholders and members of the communities in project conservancies to assess project awareness, project impacts, and understanding of project activities.

During the site visit, the verification team took photographic evidence of project lands, community meetings, soil sampling, and permanent soil sampling plot locations; took detailed notes regarding on-site monitoring activities, community meetings, and QA/QC policies; and performed the following activities:

- Interviewed project personnel to review the project activities and implementation of the Project (see Section 2.4 for details of interviews),
- Interviewed community members and leaders, who are direct beneficiaries from project implementation, about their understanding of and involvement in project activities and perceptions of project impacts (see Section 2.4 for details of interviews),
- Reviewed methods and documentation demonstrating the implementation of project activities such as execution of grazing plans, CCB monitoring including community impact monitoring and biodiversity monitoring, soil sampling, survey processes, soil component analysis, tracking of herds, and conflict management,
- Attended and participated in meetings that discuss how benefits are distributed among community members; and
- Collected GPS tracking data and waypoints within the project area and took photographs to help correlate observations with mapping data supplied by the client in KML files.

Project proponents sufficiently demonstrated that previously implemented project activities continue to take place during the current monitoring period. Evidence included NRT publications such as state of conservancies reports and status of wildlife report; conservancy management plans; summaries of community meetings during which project information was shared with members of the project conservancies; minutes from regional grazing meetings; results from household social surveys; conflict incidence reports; grazing reports, and on-site interviews.

The verification team did not undertake biodiversity verification activities during the site visit except to interview NRT personnel including its Monitoring Evaluation Manager, as described in section 2.4 of this verification report, and other project stakeholders from Grevy's Zebra Trust about the Project's biodiversity monitoring methods and surveys and trends in wildlife populations. As discussed in more detail below in section 3.3 of this verification report, no surveys of key indicator species—one of the Project's two biodiversity monitoring mechanisms (identified as the second scale in the PD, "2. Focused surveys of key indicator species" which are conducted every 3 years in five permanent biodiversity monitoring platforms, or "camps")—were conducted during this monitoring period. Thus, the verification team did not visit any of the five camps during the site visit as they were not relevant to monitoring activities conducted during this monitoring period. The other biodiversity mechanism (identified as the first scale in the PD, "1. Project-wide assessment of key wildlife species across each conservancy) was assessed during the desktop review through a

review of NRT's Status of Wildlife Report 2005-2019, as described in more detail in section 4.6.3 of this verification report. The verification team's assessment concluded that the Project has achieved its biodiversity objectives was based on this first scale monitoring mechanism. Details of the verification team's review are discussed in more detail in section 4 of this verification report.

2.6 Resolution of Findings

The verification team communicated findings to Native, summarized, and documented these findings in a List of Findings. The verification team provided two rounds of findings that included 3 corrective action requests (CARs), 1 non-material finding (NMF), 6 additional documentation requests (ADRs), and 8 clarification requests.

The details of these findings are listed in Appendix B.

2.6.1 Forward Action Requests

Previously Issued Forward Action Requests

There were three forward action requests (FARs) previously raised from the validation or from the verification of the Project's previous monitoring period:

1. A FAR was issued during the validation, and no changes were observed from validation to the first verification by that validation/verification body, and thus the FAR was re-issued in the verification report for the previous monitoring period: the FAR relates to "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.'"

The verification team requested additional information and documentation to assess whether this FAR has been resolved during the verification. The project proponent included a narrative description addressing the question of enforceable project boundaries in Section 6 of the Monitoring Report. Further, the presence of animal encroachment is assessed in the leakage and encroachment calculation files. Emissions related to animal encroachments off the project area represent the majority of leakage emissions, and are included as part of the project's leakage assessment and subtracted from the emission reduction calculations. Animal encroachment by non-Project livestock coming into the project area is very small, representing less than one percent of leakage emissions.

Although there were still significant instances of project livestock grazing outside the project area, the verification team concluded that the Project is working toward implementing more robust systems in the future to avoid project grazing outside the project area. The driving factor for encroachment off the project area is mainly drought. Due to the size of the project area and large population of livestock, it is likely that leakage emissions will continue. The verification team reviewed samples of grazing reports for this monitoring period and concluded that the FAR should be re-issued for future verifications as off-project encroachment is still a significant leakage emission source.

2. A CCB FAR was issued during validation and no progress was observed from the validation to the first verification by that validation/verification body, and thus the FAR was re-issued by the verification body for that verification: the FAR relates to “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.”

The verification team requested additional information and documentation to assess whether this FAR has been resolved during the verification. The project proponent explained that conflict related to grazing is addressed through regional grazing meetings and inter-conservancy grazing meetings. Reports from these meetings were shared with the verification team and demonstrate that conflicts are discussed among project stakeholders to help resolve past conflicts and prevent future conflicts. Additionally, grazing reports were developed for each conservancy to incorporate borders and increase transparency on livestock movement and potential encroachment. Samples of these reports were provided to the verification team as additional evidence.

Interviews with community members—including peace ambassadors, community elders, and others—provided a general overview of the history of conflicts in the project area and how the project is providing valuable mechanisms and means of communication to help prevent some of the traditional conflicts between ethnic groups. Because all community members—from multiple ethnic groups in several conservancies—participate in the project activity, there are mechanisms in place to facilitate communication and relationships between the groups. An example cited more than once was that in the event of livestock theft, because of relationships existing between ethnic groups due to the project activity, rather than retaliating, livestock was able to be recovered.

As discussed elsewhere in this verification report, the verification team also reviewed NRT’s procedures for monitoring and tracking conflicts as well as conflict data for this monitoring period. Because NRT implemented improved methods for monitoring conflicts during this monitoring period—as discussed in more detail in section 4.3.8 of this verification report—the verification team concluded that this FAR was sufficiently addressed.

3. A FAR was issued during the verification of the previous monitoring period: “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.”

The verification team requested additional information and documentation to assess whether this FAR has been resolved during the verification. The verification team reviewed

samples of grazing reports for this monitoring period and concluded that the FAR should be re-issued for future verifications.

New Forward Action Requests

The verification team raised three FARs during the verification of this monitoring period:

1. A FAR was issued related to the KML file not corresponding to areas where project activities have been successfully implemented for the monitoring period. The Project was originally validated under VCS Standard v4.0. In an update to the VCS Standard, v4.3 updated 22 June 2022, the following language was added to the requirements for AFOLU Projects in Section 3.10.2(3)(c)(i): “Any non-eligible areas (e.g. if a project activity relates to improved crop management, the KML file should only be for the participating cropland and should exclude any surrounding land that may be part of the property), and ii) Areas not part of the project area, as defined by the methodology (e.g., roads, water bodies, water ways, settlements, etc.)”. The project proponent must update the KML file before the verification of the next monitoring period to delineate only areas where the activities that reduced or removed GHG emissions have taken place (i.e., referenced proportion of participating/successfully grazed area used in the calculation of VCUs).
2. The project proponent must ensure that off-project stakeholders are included appropriately and the VVB must ensure that interviews are conducted with off-project stakeholders to meet the requirements of section 3.19 of the VCS Standard, v4.5.
3. The project proponent must conduct a comprehensive and independent assessment of their grievance mechanism, specifically examining why some stakeholders, like the Borana ethnic groups, resort to external channels for complaints. If the assessment reveals issues, the project proponent should create an improvement plan. In addition, during a subsequent verification, the VVB must assess the grievance procedure and the project proponent's efforts to enhance it, ensuring all affected stakeholders can submit grievances.

2.7 Eligibility for Validation Activities

The verification team did not perform any validation activities during the current verification.

3. VALIDATION FINDINGS

3.1 Participation under Other GHG Programs

This section is not applicable to this project. The project is not seeking registration under another GHG program.

3.2 Methodology Deviations

There were three methodology deviations during the monitoring period.

Deviation 1: “The parameter EDC_t (number of days spent by encroaching [off-project] livestock of category c on the project area during year t) was monitored during this monitoring period.

Monitoring of this parameter is not required by VM0032, but it was monitored during this monitoring period (per the request of Verra) to show that Applicability Condition 3 of VM0032 was met by showing that encroaching animal days is de minimis relative to total animal-days for project animals.”

Per Verra’s request, the number of days spent by encroaching livestock from off-project areas was monitored and estimated through grazing reports. VM0032 does not require this parameter to be monitored; instead, the Project Proponent must show that emissions from off-project animals is de minimis relative compared to total animals-days for project livestock. RCE reviewed a sample of grazing reports, Native’s method for assessing encroaching livestock from the grazing reports, and emissions from these animals.

RCE concludes that this deviation meets the specification for a methodology deviation and that the deviation does not negatively impact the conservativeness of quantification of emission reductions and removals. RCE accepts this deviation.

Deviation 2: “The methods used to measure parameter $P_{Nc,t}$ (number of project animals of category c in the project area during year t) have changed from those presented in Section 3.3.2 of the PD. This parameter continues to be calculated using trends extrapolated from 2014 conservancy census data. The means for parameter $P_{Nc,t}$ were assumed to be similar to 2014 in 2017-2020. This method was used because many Conservancies were highly inconsistent in reporting actual livestock numbers, even in months where all livestock were reported to be present on the Conservancy, or simply did not report actual livestock numbers. This method is more reliable than the previous estimation method presented in the PD and does not affect the applicability of the methodology.”

This deviation was identified during the previous monitoring period and approved by the validation/verification body during the verification of that monitoring period. The verification team approved the deviations again for this monitoring period. The deviation was previously miscategorized as a project description deviation. RCE reviewed the projections of increase in animal population over time. This deviation is relevant to project emissions only. Given the large area of the project and the amount of households participating in the project activity, RCE agrees that it is cost prohibitive and not necessarily more accurate to perform these surveys on a more frequent time scale.

RCE agrees that this deviation is still valid because the original census numbers were input into a model and projected forward based on an estimation of population growth. During the site visit, it was clear that the same animal populations sampled in 2014 are still currently being grazed in 2022. RCE did not see any other animal types being actively grazed outside of what was originally sampled confirming there hasn’t been a shift to using different species of livestock.

Further, the projections are likely overly conservative. Project emissions from grazing are calculated as being greater than 75% in the Project Scenario. It is unlikely that livestock populations have grown this much over the last eight years due to the nature of the low productivity on land being grazed and due to drought in 2019 and 2020. During the site visit, RCE observed several types of livestock categories being grazed and based on body mass, it is likely unrealistic that the Project livestock population has grown as much as the model provided by the Proponent suggests.

RCE does not believe that using 2014 census data and projecting forward growth is overestimating net emission reductions.

This deviation does not affect the baseline scenario or applicability conditions but rather monitoring frequency and does not impact conservativeness. RCE believes that this deviation will be conservative for future monitoring periods because of compounding effects of climate change and continuing drought in the region will limit the actual growth of livestock populations well below what is currently modeled based on population growth.

Deviation 3: “The methods used to measure parameter DNc,x (number of project animals of type c off the project area during month x) have been updated from those presented in Section 3.3.2 of the PD. The update (Section 3.1.2 of this MR) clarifies how monthly grazing reports from each conservancy are used to determine the parameter value for the quantification of leakage emissions. Three reports for the former monitoring period were either missing or incomplete (Biliqo Bulesa, April 2014, Namunyak, Nov 2014 and Dec 2015). In each instance, leakage estimates for neighboring months were evaluated and the month with the highest reported leakage was used to substitute for the missing report.”

The verification body for the previous monitoring period approved this deviation and there have been no changes. This deviation is valid for subsequent monitoring periods as taking the highest values from neighboring months is conservative when reporting this parameter.

This deviation does not affect the baseline scenario or applicability conditions but rather monitoring frequency and does not impact conservativeness. RCE’s assumption is that this deviation will be conservative for future monitoring periods as the highest reported value of livestock in adjacent months to the missing reports is used in the calculation of project emissions.

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

The Project identified six Project Description deviations for this monitoring period. The first four of these deviations were identified during the previous monitoring period and approved by the validation/verification body during the verification of that monitoring period. The verification team approved the deviations again for this monitoring period.

Deviation 1: “Section 2.1.15 of the PD lists the project crediting period as beginning on 10 December 2012. For the first verification, the monitoring period was moved to 01 January 2013. Project monitoring period activities were not fully implemented until 01 January 2013.”

The verification team approved this deviation because the crediting period remains fixed. The verification body for the previous monitoring period approved this deviation and there have been no changes.

Deviation 2: “While Section 2.1.9 of the PD identifies project stakeholders based on occupation, socioeconomic status, and role in the community, Section 4.2.1 of the PD proposes to monitor impacts on the basis of ethnic group. During the first monitoring period, we identified stakeholders based on occupation, socioeconomic status, and role in the community and monitored impacts only on those stakeholder groups (Section 4.1.1 of [the monitoring report]).”

The verification body for the previous monitoring period approved this deviation and there have been no changes.

Deviation 3: “The parameter EDC,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 this Monitoring Report. This parameter is used along with an approach modified from the “Tool for testing significance of GHG emissions in A/R CDM project activities” to show that project emissions from encroaching livestock for the current monitoring period are de-minimis (<5% of project methane emissions) in each year of the monitoring period and can therefore be excluded from the final calculation of net emissions and removals. This demonstration can be found in the ‘NRT Methane Encroachment’ tab of the spreadsheet ‘NKCP Methane Calculations 2017-2020 v1 Sept2021.xlsx’.”

The verification body for the previous monitoring period approved this deviation and there have been no changes.

Deviation 4: “The project area has decreased by 3 ha due to technological improvements in analyzing conservancy boundaries. The change from 1,993,078 ha to 1,993,075 ha is reflected in all calculation files and was reviewed by the VVB during the 2017-2020 verification event.”

This deviation is appropriately justified and is in compliance with Verra’s rules. It does not affect the applicability of the methodology, additionality, or appropriateness of the baseline scenario. This is a conservative approach as it reduces the total acreage of project land.

Deviations 5 and 6: “For the 2017–2020 monitoring period, there were two deviations (5 & 6) to the remote sensing method as compared to the 2013–2016 Monitoring Report. First (deviation 5), an adjusted set of un-grazed reference polygons is used for calculating annual relative change in biomass. This is justified due to conservancies with lower mean annual rainfall (relative to wetter reference polygons) exhibiting high relative changes in NDVI and thus being judged in error as unsuccessful. Secondly (deviation 6), the threshold value of annual relative change in NDVI is adjusted from 0.05 to 0.1. This is justified because a threshold of 0.1 more accurately reflects the occurrence of single grazing events in both wet and dry season grazing areas.”

The verification team approved this deviation because the updated reference areas are temporally closer to the reporting period and thus more accurately reflect project successful grazing implementation. Also, there were several dry years during the reporting period and this exaggerated issues with the previous NDVI analysis methods. The updated method more accurately assesses whether project activities have been implemented. This deviation does not affect the applicability of the methodology, additionally, or appropriateness of the baseline scenario. This deviation is appropriately applied and specific to monitoring and metering of successful implementation across the Project area. The methodology does not specifically establish the exact procedure for measuring successful implementation. RCE reviewed this deviation in detail and agrees that it is a conservative, accurate and realistic way to adjust the original NDVI analysis over time in order to account for variation in rainfall across this large project area and that it is in compliance with VCS Program rules regarding such deviations. This is a conservative approach that does not overestimate net emission removals.

RCE also reviewed the minor change to the PD regarding the timing of biodiversity monitoring. The PD states that “Surveys of key indicator species and sampling in savanna/grassland habitats will take place every 3 years in five permanent biodiversity monitoring platforms, or ‘camps.’” Baseline surveys were conducted in 2014 and the first project surveys were conducted in 2021. The justification for this change in survey timing is that as the project did not generate VERs (from 2013-2016) to be sold until 2021, the project did not have revenue to pay for the biodiversity sampling.

The verification team agrees that this is a minor update which does not impact the applicability of the methodology, additionality of the Project, or the appropriateness of the baseline/without-project scenario. The verification team confirmed that this update is appropriately described and justified in the Monitoring Report and that the project remains in compliance with the CCB Version 3 and VCS rules.

3.4 Minor Changes to Project Description (Rules 3.5.6)

In the PD, the Project proponent states that, “Surveys of key indicator species, sampling in savanna/grassland habitats will take place every 3 years in five permanent biodiversity monitoring platforms, or ‘camps’”. Baseline surveys were conducted in 2017 and the first project survey was conducted in 2021. No survey took place in 2017 because the project did not generate VERs for sale until 2021 and the project did not have revenue to pay for the biodiversity sampling

RCE agrees that this is a minor change that was appropriately described and justified in the monitoring report. The project remains in compliance with the project’s validated design.

3.5 Grouped Project

This is not a grouped project.

4. VERIFICATION FINDINGS

4.1 Public Comments (*Rules 4.6*)

Public comments were submitted as part of the 30-day CCB public comment period from 12 January 2023 to 11 February 2023. The Project Proponent sufficiently addressed all comments (see Appendix C). The verification team also responded to all public comments (see Appendix C). During the site visit RCE attended community assemblies where Project implementation issues were discussed and questions/requests by the communities were addressed. These comments will be taken into account for the planning of future activities, as well as to promote and improve the pastoralist communities. See section 4.3.5 for more information.

4.2 Summary of Project Benefits

Project benefits described in the validated PD and Monitoring Report for this monitoring period are adequately substantiated by project documentation and observations during the site visit.

Climate benefits result from the primary project activity of planned rotational grazing. The emissions reductions from soil sequestration due to rotational grazing are correctly stated according to the

calculations in the spreadsheet, and those calculations were performed according to the methodology (see Section 4.4).

Community benefits are being achieved by planned rotational grazing and the restoration of grass and other livestock forage. These contribute to and increase the climate adaptability of communities. The revenues generated from the sale of Project credits also benefit local communities, as discussed in more detail later in sections 4.5.1 and 4.5.12 of this Verification Report.

Biodiversity benefits are being achieved through the restoration of grasses and other forage and soil water. This will help to sustain and increase populations of endangered wildlife species in the project area as well as other plant, tree, insect, and bird populations.

Results of monitoring are presented in the Monitoring Report and other project documents and demonstrate that the Project is achieving the stated benefits. The Project is anticipated to achieve even greater benefits as it continues into the later years of its 30-year crediting period. The verification team concludes that the Project sufficiently reported and substantiated the project benefits during the current reporting period.

4.3 General

4.3.1 Implementation Status (G1.9)

RCE confirmed the implementation status of the project activity by reviewing documents related to CCB requirements, confirming that the monitoring plan was followed when collecting data and by re-calculating emission reductions. RCE did not identify any material discrepancies between the project implementation and the PD that are not already covered under Project Description and Methodology deviations listed in Section 3.2 and 3.3.

The responsible parties are following the implemented monitoring plan and are monitoring data and parameters necessary to confirm successful implementation of the project. RCE confirmed this by reviewing CCB documents including interviews, meetings and publications as well as grazing reports showing successful implementation of the Project activities. Any discrepancies between the monitoring system during the current monitoring period and the monitoring plan set out in the PD is addressed as deviations in Section 3.2 and 3.3. The GHG emission reduction have not come under an emissions trading program or any other allowance trading. The Project has not received or sought after any other forms of environmental credits nor has it participated or been rejected by any other GHG programs since the previous verification.

Previous validated methodology deviations, project description deviations and minor changes to the PD are included in Section 3.2 and 3.3 of this report.

RCE concludes that the project has been implemented as described in the PD.

4.3.2 Risks to the Community and Biodiversity Benefits

Risks to the Project include both short-term and long-term risks. Section 2.2.7 of the Monitoring Report describes natural and human-induced risks to the expected climate, community, and

biodiversity benefits of the Project and measures to mitigate these risks. During the site visit, the verification team discussed several of these risks and the measures needed and taken to mitigate these risks with Project participants, stakeholders, and conservancy members. During these conversations, some of the steps to mitigate risks were particularly evident and appear to be successful during the implementation of the Project thus far including educating the conservancies on the community and personal benefits linked to continued participation in the project and implementing strategies to handle encroachment including training game scouts to handle and communicate about encroaching livestock herders and poachers. Project proponents have made routine efforts to educate and demonstrate the positive influence of improved rangeland conditions on biodiversity and the benefits of biodiversity to local conservancies. Climate change remains one of the largest external risks with the potential to cause irreversible degradation of rangeland; however, through implementation of the Project, project proponents seek to provide a better buffer for conservancies and more management options to deal with impacts of climate change.

Encounters with antagonistic ethnic groups in the project area is acknowledged as a risk in the PD. Project activities implemented to help mitigate these risks are identified as: use of rapid response teams, peace meetings, and regional grazing plans as well as facilitating better communication between grazing coordinators and game scouts to resolve disputes and conflicts. As discussed in more detail in sections 4.3.8, 4.5.2, and 4.5.5 of this Verification Report, the verification team reviewed evidence of these activities occurring during the monitoring period including minutes and reports from peace meetings, grazing plans, and minutes from grazing meetings. As described elsewhere in this Verification Report, the Project's use of mechanisms and processes that are culturally appropriate and consistent with traditional conflict resolution systems, is unlikely to escalate ongoing or unresolved conflicts, and furthermore, project activities are expected to reduce the conflicts which have occurred historically in the project area.

The Project risk summary accurately reflects internal, external, and natural risks and project proponents have taken steps to reasonably mitigate risks.

4.3.3 Community and Biodiversity Benefit Permanence (G1.11)

The Project is part of a larger effort by numerous organizations to restore rangelands and improve well-being of communities in northern Kenya. Section 2.2.8 of the Monitoring Report describes the measures needed and taken to maintain and enhance the climate, community, and biodiversity benefits beyond the project lifetime including educational efforts in the conservancies to improve long-term livelihood and land management and to graze livestock more sustainably over a 30- to 50-year period. During the site visit, the verification team observed Project activities and interviewed project participants, stakeholders, and conservancy members about ongoing actions to enhance long-term project benefits. The most evident actions included ongoing education in the conservancies about sustainable grazing practices and the incentives to continue the grazing practices into the future.

The verification team concluded that the Project has taken reasonable measures to enhance project community and biodiversity benefits beyond the Project lifetime in accordance with the validated PD.

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

Project information is routinely communicated to stakeholders and members of the Project conservancies via meetings; printed documents and public postings; emails, calls, and texts; and postings on the NRT website. Project proponents also maintain documentation of the Project's performance and status which is provided during meetings and is available at NRT headquarters, conservancy headquarters, and posted publicly at kiosks. The verification team reviewed documentation and conducted site visits using a sampling approach. The team assessed evidence of information sharing and meetings conducted for a sample of project conservancies. Similarly, during the site visit, a member of the verification team visited a sample of project conservancies (3) to observe a conservancy-wide meeting and to interview community members in the conservancies about project impacts, project information communication, project revenue sharing, and general feedback on project implementation. During the verification process and verification site visit, the verification team observed no evidence of objections to the project design and the revenue-sharing structure of the project during the monitoring period by inhabitants of the project conservancies. NRT confirmed that it received no project grievances from conservancies/ conservancy members during the monitoring period.

The verification team reviewed evidence of information communicated throughout this Project monitoring period including minutes from conservancy grazing meetings and trainings; annual reports distributed to conservancy members prior to annual general meetings (AGMs); minutes from AGMs; meeting agendas, minutes, attendance lists, and photos from inter-conservancy meetings and regional meetings; minutes from the rangeland coordinators forum; presentation slides from a conservancy grazing committee training; minutes from carbon project awareness meetings; and annual conservancy reports. The verification team also reviewed the notification of results from the previous project validation and verification as well as the notification of the site visit as part of the verification of this monitoring period and interviewed the project proponent about the processes to communicate verification results and site visits to the project conservancies and stakeholders. Because of the high rate of illiteracy in the project conservancies, information is routinely communicated through meetings and presentations within the conservancies.

During the site visit, one member of the verification team attended the Melako Conservancy AGM on 30 March 2022. The verifier observed the dissemination of Project information to the members of the conservancy and voting by conservancy members on how to use the Project revenue distributed through the NRT Pooled Conservancy Fund. As described in more detail in sections 4.5.1 and 4.5.12 of this verification report, no revenues were shared during the 2017-2020 monitoring period; however, the verifier observed sharing of revenues in 2021. The verifier also interviewed project stakeholders and conservancy members about their access to project information.

The verification team reviewed results of surveys (Social CoMMs) conducted during the monitoring period by the project proponent. Social-CoMMS is a platform used by NRT to capture community input and to collect data on socio-economic perceptions and program impacts within conservancies. It should be noted that the Social CoMMs surveys are conducted by NRT in all conservancies, not just those that participate in the Project. The questions are not intended to be specific to the Project but are intended to gauge household perception towards the conservancy, which for conservancies within the project area would be directly impacted by the Project. It is clear

how closely intertwined the Project activities are with the existence and the objectives of the conservancies and every aspect of the day-to-day livelihoods of members of the conservancies. Project activities are influenced by conservancy activities and conservancy activities are influenced by project activities. Due to this close interconnection, the responses and trends from results of Social CoMMs provide valuable feedback on project activities.

Based on the verification team's assessment of the survey methodology, distribution process, and result analysis, which are statistically sound, it is reasonable to conclude that the results provide a representative sample of respondents in each conservancy for which Social CoMMs were conducted.

The methods for the Social CoMMs surveys were developed by social scientist Dr. Jessica Musengezi of The Nature Conservancy and supported by NRT staff. Methods were statistically sound, and there was no indication that results were not accurate or that results were overlooked, distorted, or favored certain information. The verification team's assessment considered the following:

- Enumerators are members of the community and are provided with a comprehensive two-day training for Social CoMMs standard operating procedures. The training covers how to conduct the survey, administrative issues related to the survey, information about the conservancy and its impacts, as well as the purposes of the survey.
- The average sample size was determined using a confidence interval table which is a systematic approach that results in robust and reliable study outcomes. A level of confidence of 95% and a confidence interval of 5 were used. A high level of confidence requires a large sample size and ensures a high level of precision. A confidence interval of 5 also necessitates a large sample size and allows for greater precision in estimating population parameters.
- The use of the cluster sampling methodology allows for the systematic inclusion of all settlements and their household within the conservancy.
- Counting the total number of settlements in the conservancy to determine the number of clusters is a straightforward approach. Each settlement represents a cluster, which is a common practice in cluster sampling. Using a random number generator to pick a starting point for sampling is a common practice in systematic sampling. This random starting point helps to reduce potential bias that might arise if there's any systematic pattern in the order of the household. Dividing the overall sample size by the number of clusters is a clear way to determine how many households should be sampled from each cluster (a settlement). This method ensures an equal distribution of the sample size across clusters, which can be useful for balanced representation.
- A mobile application platform called Kobo Collect is used to collect data in the field. Digital data collection ensures that survey responses are accurately recorded and transferred to a data management system for subsequent data analysis. These methods reduce the likelihood of survey errors, errors when recording data, leading respondents toward are particular answer, and/or distorting results. The project proponent provided the raw data sets collected via the app to the verification team.

As described above, Social CoMMs are used independently from the Project by the project proponent to collect socio-economic data to track the impact of the conservancies on the people and to determine the perceptions of the conservancy by the community. None of the questions in the survey are specific to the Project itself, so results must be reviewed in this context; however, as noted elsewhere in this verification report, Project activities are influenced by conservancy activities and conservancy activities are influenced by project activities. Due to this close interconnection, the responses and trends from results of Social CoMMs provide valuable feedback on project activities. The surveys were designed with questions to generally assess socio-economic conditions and therefore there is little risk that the questions themselves introduce bias on perceptions of the Project. Analysis of responses over time generally indicate positive trends in socio-economic conditions. There is no evidence that the survey methods or survey design would lead to overlooking, distorting, or favoring information as it relates to the Project.

A representative sample of households was selected using probability proportional to size sampling, which ensures that a representative subset of settlements is randomly selected for surveying from each conservancy. The household surveys included questions about demographics, education, livelihoods, security, grazing, wildlife, health, water, etc. During the 2017-2020 monitoring period, Social CoMMs were conducted in two project conservancies in 2017, representing ~30% of households in those two conservancies, and in five conservancies in 2020, representing ~46% of households in those conservancies. Results of the Social CoMMs conducted in 2017 and 2020 are shown in the table below.

Table 1. Social CoMMs Results

Year	2017	2020
Survey summary	2 conservancies surveyed	5 conservancies surveyed
Respondents believed conservancy leaders maintained good communication with conservancy members	48% good/somewhat good 20% no	77% good/somewhat good 9% no
Respondents believed their opinion is adequately represented in conservancy decisions	36% yes 34% no	53% yes 27% no
Methods through which respondents receive information from the conservancy.	50% from friends 48% from conservancy board members 18% from conservancy management	34% from conservancy board members 20% via AGMs 16% from friends
Respondents believed conservancy benefits were fairly distributed	42% yes 31% no	59% yes 24% no
Respondents were very satisfied or somewhat satisfied with the work the conservancies are doing	76% very satisfied or somewhat satisfied 17% not satisfied	76% very satisfied/ somewhat satisfied 16% not satisfied

When 31% and 24% of respondents (respectively in 2017 and 2020) responded they believed conservancy benefits were not fairly distributed, the response is related to “conservancy benefits” in general (which could include any benefits such as those related to health, education, water, employment, etc.), rather than only being related to “project benefits” specifically. As noted above,

the intent of the Social CoMMs surveys is to collect data to monitor, analyze, and manage the positive and negative social impacts of conservation and associated development activities implemented and facilitated by the conservancy. Results are used by the conservancy management and boards to inform strategic plans and operations and monitor impacts of their programs. Responses to questions in the Social CoMMs surveys serve as indicators of conservancy members' perceptions of the Project; however, they are not exclusively related to the Project and could be impacted by other activities.

Social CoMMs results are shared with respective conservancy managers who are responsible for discussing the results with the conservancy boards. Results are also used to inform social development projects including access to water, education, and healthcare and are incorporated into 5-year Conservancy Management and Development Plans. The verification team reviewed examples of these Management and Development Plans, most of which covered 5-year periods of 2016-2020 and 2017-2021.

The Monitoring Report indicated that the project has more recently communicated information about the sharing of revenues generated from the sales of credits, but there is no evidence that information about the project's participation in the voluntary carbon market nor information about costs, risks, and benefits associated with the Project was withheld from project stakeholders. The Project routinely communicates project information to stakeholders. The verification team reviewed evidence that information about the Project's participation in the voluntary carbon market, including that NRT will sell the rights to claim GHG emission reductions and that sales will have material benefit to the conservancies, was communicated to stakeholders via Consent and Waiver forms and letters of acknowledgement signed by conservancy leadership. These agreements were also reviewed as part of the Project's validation. The verification team discussed with project proponents how the details and numbers of the benefit sharing mechanisms were not fully communicated to all stakeholders until after the project was validated and the first monitoring period verified and VCUs issued and there were benefits to be shared with the conservancies. The verification team observed the Project's benefit sharing first-hand during a conservancy Annual General Meeting as discussed in more detail in sections 4.5.10, 4.5.11, and 4.5.12 of this verification report.

The verification team concluded that the Project has provided appropriate access to information to communities and other stakeholders. The assessment of whether stakeholders were fully informed about all aspects of the project before making decisions about their participation in or the development of the project was assessed during the project's validation. The validation report communicates details of the validation team's review of evidence that community members understood the benefits of project activities and approved intensified efforts to conduct grazing plans.

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

As described in sections 2.3.7 through 2.3.9 of the Monitoring Report the project proponent consulted stakeholders on project implementation as part of baseline social data gathering, through routine surveys in the conservancies, and through ongoing meetings in the conservancies as described above.

During the site visit, the verification team interviewed NRT's Monitoring Evaluation Manager about the social community managed monitoring program (Social CoMMs) surveys conducted in the conservancies as part of baseline data gathering and ongoing data gathering processes. Topics discussed included survey procedures, survey questions and areas of focus, development of the surveys, training for community members giving the surveys, and results. Baseline Social CoMMs were conducted in 2013 and 2014 and Social CoMMs conducted as part of ongoing project monitoring were conducted in two project conservancies in 2016, two project conservancies in 2017, and five project conservancies in 2020. Summary results and highlights are presented in the Monitoring Report. The results of the Social CoMMs are incorporated into grazing plans, community education efforts, and communication priorities.

As discussed above in section 4.3.4, the verification team reviewed evidence of ongoing community meetings during which Project information is communicated and feedback from community members is received. The verification team also observed one of the conservancy AGMs during which members of the community had opportunities to provide feedback to project proponents. Through interviews with conservancy members, it was also clear that members of the community are given opportunities to provide input on project implementation, specifically through conservancy representatives who communicate with project personnel at higher levels.

Furthermore, the verification team concluded that decisions made by community group leaders represent the voice of the communities. All community conservancies, whether in community land or trust land, conduct democratic elections for their conservancy board of directors. Leadership changes every three years. Regular meetings are held at the conservancy and regional levels, including quarterly grazing meetings and annual general meetings (AGMs) in each conservancy during which information about livestock grazing plans and monitoring, project benefits, and general project information is communicated. The voices of the community/conservancies are represented by the leaders they elect.

The verification team assessed actions implemented by the project to improve community engagement over time and ensure effective stakeholder engagement including the following:

- Holding quarterly grazing planning meetings, which include individual herders in conservancy zones; conservancy grazing committee meetings with representatives from each zone; and regional grazing planning meetings among neighboring conservancies.
- Disseminating project information via routine meetings including grazing awareness meetings (educational visits to other project conservancies), conservancy board meetings, council of elders meetings, grazing committee trainings, monthly regional grazing meetings, and grazing planning (wet season) meetings.
- Providing community employment opportunities either with one of the conservancies or with NRT.
- Providing worker training, which includes training for grazing management and monitoring positions (surveys).

The verification team assessed implementation of these and other actions through:

- Reviews of meeting agendas and minutes
- Regional summaries of meetings prepared by NRT personnel

- Documentation of trainings
- Photos of public announcements
- Interviews with the project proponent
- Interviews with conservancy leaders and community members
- Reviews of survey (Social CoMMs) data.

The verification team found that these activities improve community engagement over time and continue to ensure effective stakeholder engagement for sustained involvement in the project.

In addition, the Social CoMMs results presented in Table 1 in section 4.3.4 above, helped the verification team to conclude that community and stakeholder engagement are increasing over time. Community perceptions of the conservancies are more positive as more time passes. Respondents increasingly believe conservancy leaders maintain good communication with conservancy members. Increasing numbers of community members are receiving information about the conservancy from board members and via Annual General Meetings (AGMs) which are annual meetings held in each conservancy to provide conservancy updates and receive questions and feedback from conservancy members. The verification team concludes that the Project effectively consulted stakeholders on project implementation in accordance with the requirements of G3.4 and G3.5.

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

The Project encourages participation by all members of the community, particularly more vulnerable groups like women, the poorest 25%, and ethnic minorities. Project Proponents acknowledge that due to cultural divisions of labor, most grazing decisions are made by men and including women and households without livestock in the decision-making process can be challenging. Focus groups that included women and young men were interviewed during baseline surveys and ongoing project monitoring via Social CoMMs, as discussed above, consider a representative sample of all conservancy members. The sample of households was selected using probability proportional to size sampling, which ensures that a representative subset of settlements is randomly selected for surveying from each conservancy. The household surveys included questions about demographics, education, livelihoods, security, grazing, wildlife, health, water, etc. Social-CoMMs were conducted in five project conservancies during the monitoring period, interviewing ~45% of total households in those five conservancies. The verification team reviewed a sample of survey results.

During the site visit, the verification team observed attendance at the Melako Conservancy AGM which included both men and women. Furthermore, site visit interviews with conservancy members included women board members and conservancy members.

Eight project conservancies (of 13 total project conservancies) were represented by site visit interviews and surveys conducted by the project proponents.

The verification team concluded that the Project effectively enabled community participation in project implementation.

4.3.7 Anti-discrimination (G3.7)

The project proponent maintains policies to avoid discrimination and sexual harassment as documented in its NRT Human Resources Policies and Procedures Manual. The verification team reviewed the document which includes procedures for reporting harassment, making formal complaints, and representation. Field employees participating in project activities are provided with proper training and safety equipment and protective gear.

During the site visit and review of Project documents and data, the verification team did not observe any evidence of discrimination or sexual harassment with respect to the Project and concludes that the project proponent and other entities involved in the Project are not involved in or complicit in any form of discrimination or sexual harassment.

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

The project proponent maintains policies for complaints and grievances in its NRT Human Resources Policies and Procedures Manual. These are also documented in Section 2.3.12 of the validated PD and in the Monitoring Report. NRT reported that it received no project grievances during the monitoring period and thus it did not implement the Feedback and Grievance Redress Procedure. During the site visit and review of Project documents and data, the verification team did not observe any evidence of grievances by any community members or other project participants with respect to the Project during this monitoring period.

During the site visit the verification team interviewed NRT's Head of Peace and Security and another member of the Peace Department about their work with conservancies to educate and advise communities on how to reduce conflicts and to mitigate negative well-being of project stakeholders and other stakeholders. Project policies and activities for avoiding conflict, managing existing conflict, and resolving disputes include the facilitation of peace meetings and rapid response teams. The verification team reviewed evidence of Project activities related to managing and improving peace and security, including:

- Minutes from peace meetings during the monitoring period which are held with the NRT Peace Department, conservancy members, local leaders, and government officials. The peace meetings are used to address conflicts over land, pasture, and livestock. These peace meetings took place both after conflicts occurred and as efforts to prevent future conflicts. Peace meetings also target ethnic groups and regions identified in the PD as areas and stakeholders at higher risk for conflict.
- NRT's Half Year Reports and State of Conservancies Reports which document peace meetings occurring in and outside community conservancy boundaries, trainings held for peace ambassadors, and establishment of peace committees.
- A report compiled by a conservancy manager following a conservancy peace meeting during the December holiday season showing that there were zero raids reported as a result of improved relationships and networking between ethnic groups.
- Interviews with community members—including peace ambassadors, community elders, and others—provided a general overview of the history of conflicts in the project area and how the

project is providing valuable mechanisms and means of communication to help prevent some of the traditional conflicts between ethnic groups. Because all community members—from multiple ethnic groups in several conservancies—participate in the project activity, there are mechanisms in place to facilitate communication and relationships between the groups. An example cited more than once was that in the event of livestock theft, because of relationships existing between ethnic groups due to the project activity, rather than retaliating, livestock was able to be recovered.

Through discussions with the project proponent, the verification team also confirmed that there is an informal grievance or dispute resolution mechanism in place whereby a dispute is handled by community groups before it becomes an official grievance or complaint and is taken to the conservancy leadership. These disputes may include those related to unplanned grazing and access to land, water, and resources, among others. The project proponent explained that under the informal grievance mechanism, an issue is brought to the grazing committee. The grazing committees represent all herders within their respective zones within their conservancy. The verification team considered the example of a dispute over unplanned grazing, which is handled by conservancy grazing committees and the community elders representing the involved communities. In this case, the involved parties and community elders meet to discuss the grazing plan. As discussed in more detail below, this mechanism is an example of a method that is culturally appropriate and is consistent with traditional practices and norms. In this way, the Project and implementation of project activities support traditional cultures. If a dispute escalates and develops into a conflict with unlawful activity, it would be handled by relevant national authorities, and it would not be considered a project grievance by the project proponent. The verification team confirmed that details about this process have been added to the Monitoring Report in section 2.3.12.

As stated elsewhere in this Verification Report, it is clear to the verification team how closely intertwined the Project activities are with the existence and the objectives of the conservancies and every aspect of the day-to-day livelihoods of members of the conservancies. The verification team understands that there are activities and incidents—including conflicts—that exist in the project area which would have occurred in the absence of the Project. There is evidence that these conflicts occurred prior to the implementation of the Project. Thus, not all conflicts can be linked to the Project.

There is a history of conflict between ethnic groups in the project area based on access and proximity to water leading to encroachment of herders from other conservancies and outside the project area. There is also a history of persistent livestock theft between groups, and conflicts are more likely to occur during droughts. However, the Project is unlikely to either cause or influence the outcome of these conflicts. Project activities involve movement of livestock according to conservancy or regional grazing plans and disputes or conflicts are more likely when herders are not following planned grazing activities. As a result of the Project, there are more elders scouting project conservancies for pastures in an effort to avoid conflicts and game scouts and rangers within the conservancies patrolling to mitigate wildlife conflicts.

NRT has been monitoring and tracking conflicts within the project area in a database in more detail in recent years, starting in the final year of this monitoring period (2020). The verification team reviewed NRT's procedures for monitoring and tracking conflicts as well as conflict data for this monitoring period. Data from 2020 through early 2023 shows that on average there are far more

conflicts categorized as limited carbon/project influence than those categorized as direct carbon/project influence (a ratio of 8 to 1). The conflicts categorized as limited carbon/project influence are the types of conflicts that were already occurring prior to the implementation of the project, as described above. The monitoring of conflicts in future monitoring periods will be valuable information to help inform how the project impacts conflicts in the project area; however, for the 2017-2020 monitoring period, the data is limited, and due to gaps in reporting for pre-2020, there is no robust analysis for 2017 to 2019. As discussed in more detail in section 4.3.4 of this Verification Report, the project proponent conducted surveys (Social CoMMs) during the monitoring period, which represent conservancy impacts on inhabitants of the conservancies. The verification team reviewed the results of surveys in two project conservancies in 2017 and five project conservancies in 2020 which indicated:

- 62% and 78% of respondents (respectively in 2017 and 2020) believed that, compared to 12 months ago, the security in their communities improved (4% believed it worsened in 2017 and 2020).
- 51% of respondents believed that disputes about livestock raiding were the top source of conflict in their conservancies. NRT categorizes this as a limited carbon/project influence conflict.

NRT categorizes conflicts as those with no carbon/project influence (ethnic incitement, internal family/community disputes, theft), limited carbon/project influence (livestock rustling, competition for land, retaliation), and carbon/project influence (competition for grazing and water). The history of conflicts is higher in project areas where multiple ethnic groups are present in the region, primarily occurring at county boundaries. For example, in the Samburu district there are more frequent raids and inter-tribal conflicts (which NRT categorizes as limited carbon/project influence and no carbon/project influence conflicts, respectively). These conflicts occurred prior to the implementation of the Project, and they continue to occur during the Project monitoring periods. NRT has strategically focused on areas with a history of conflict, including border areas, in an effort to mitigate conflicts, especially through the implementation of the planned grazing and other project activities. In the validated PD, NRT identified four ethnic groups as key target stakeholders for improved governance, education about grazing management, and conflict resolution: Samburu, Borana, Rendille, and Maasai. Members of these communities were judged to be the most likely sources of encroaching livestock based on historical accounts of elders from conservancies on the outer edge of the project area or with considerable dry season grazing range. Notably, representatives of some of these groups are those that have contributed—whether allegedly or genuinely—to reports/publications that cited concerns about NRT and conservancies, e.g., “Boran Council of Elders”.

Disputes related to cattle-raiding within the project area predate the Project and have occurred historically in the project area well before the implementation of project activities. These disputes and conflicts are not considered project grievances and are not handled as part of the Project’s complaints and grievances policy. Any illegal activities, such as cattle raiding, are handled by the appropriate national authorities. As described in the monitoring report, cattle-raiding is theft of property and is dealt with by official government procedures; however, the Project does also have mechanisms in place to report such incidents and address them using lawful means. The results of Social CoMMs, as discussed in more detail in section 4.3.4 of this Verification Report, show that

respondents believed the most common type of conflict in their community was livestock raiding: 79% and 67% of respondents (respectively in 2017 and 2020). These responses are related to conflicts occurring within the geographic boundaries of the conservancies rather than “project-driven conflicts” specifically. The geographic boundaries of the conservancies which are part of the Project are included in the Project area. These responses do not indicate that livestock raiding is Project driven. The intent of the Social CoMMs surveys is to collect data to monitor, analyze, and manage the positive and negative social impacts of conservation and associated development activities implemented and facilitated by the conservancy. Because conservancy activities and project activities are closely interconnected, the responses and trends from results of Social CoMMs provide valuable community perceptions on project activities.

The verification team’s evaluation of the effectiveness of the Project’s formal grievance mechanism included discussions with the project proponent, discussions with project stakeholders, and reviews of documentation and evidence provided of meetings and information communicated to Project stakeholders. It should be noted that during the verification team’s assessment it was challenging to assess the effectiveness of the Project’s grievance mechanism when no project grievances have been submitted. The grievance mechanism includes steps to receive, hear, respond to, and resolve grievances within a reasonable timeframe. The verification team determined the grievance mechanism to be accessible to project stakeholders because the first step in the process consists of the community member bringing the grievance to conservancy leadership (e.g. Rangeland coordinator or Conservancy manager). This first step occurs at the local level and does not appear to be onerous to community members either in accessibility or level of effort or time required to bring a grievance to conservancy leadership. Grazing committee meetings are held monthly and are open to all members of the conservancy. The verification team observed no evidence that the mechanism is not or would not be functional.

While the grievance mechanism does not explicitly identify the types of grievances or complaints that may be submitted, it also does not limit what types may be submitted by project stakeholders, and thus the verification team concluded that the mechanism has the potential to address different and all types of grievances. As described elsewhere in this Verification Report, there are conflicts that exist within the project area which have neither been submitted as grievances during this monitoring period, nor are handled by the grievance mechanism since they are not caused by the implementation of the Project or related to project activities. To be clear, no grievances were submitted during this monitoring period and the grievance mechanism was not enacted. Any illegal activities, such as cattle raiding, are handled by the appropriate national authorities and are not project grievances, nor are they caused by project activities.

The verification team found the conflict resolution methods in the project area to be consistent with cultural values and norms. Traditional conflict resolution methods involve informal negotiation, reconciliation, and mediation among parties involved, with third parties such as community elders facilitating the arbitration. The Project’s informal dispute resolution mechanism is consistent with traditional conflict resolution methods as it provides for negotiations between disputing groups with elders acting as third parties. The project proponent also engages in activities to avert potential conflicts by using peace ambassadors and peace committees; educating members of the conservancies, especially youth, via peace training sessions; and facilitating dialogue between ethnic groups. It is likely that the Project received no grievances via its formal grievance mechanism during this monitoring period because disputes were handled within communities using

these traditional conflict resolution processes and resolved before they became grievances against the Project.

The verification team also found the formal grievance mechanism to be culturally appropriate. Phase 1 of the grievance procedure is verbal discussion whereby “Complainants are required to bring complaints to the attention of the Conservancy project authority, or grazing coordinator, or Conservancy manager in the case that the grievance is with the Conservancy grazing coordinator, for the Conservancy on which the grievance occurred in the first instance. The Conservancy authority is required to respond to the complaint within two (2) working days. A resolution is encouraged at this stage through discussion and negotiation.” The use of discussion and negotiation as phase 1 is consistent with traditional methods for conflict resolution.

The verification team concluded that the formal and informal grievance mechanisms are accessible and that the procedures are designed to be effective and functional. The mechanisms employ processes that are consistent with traditional conflict resolution and are culturally appropriate. Project activities do not escalate ongoing or unresolved conflicts and furthermore, implement activities to reduce the conflicts which have occurred historically in the project area. The implementation of the Project is such that conflicts—including those with limited carbon/project influence and direct carbon/project influence—should be reduced over time because of project activities. The verification team’s assessment concluded that the project proponent, because of the project activities, has not exacerbated conflict in the project area.

4.3.9 Worker Relations (G3.9 – G3.12)

The project proponent has implemented measures to ensure that the relationship between the Project and workers—people directly working on project activities or project-related work—meet the requirements of the CCB Standard. Worker training is handled by NRT as guided by its NRT Human Resource Policies and Procedures Manual. Specifically, worker training is provided for grazing committee members, game scouts, and individuals employed to monitor project activities via social, vegetation, and Wildlife Conservancy Management Monitoring System (Wildlife CoMMS). NRT encourages formal training. Training for many positions is implemented by conservancy members based on experience and on-the-job training. Training for some positions such as grazing coordinator has included university courses and off-site training. The verification team observed the importance and value placed on training in discussions with project proponents and stakeholders during the site visit during which training and capacity building were emphasized for many Project positions. NRT also provided slides from a conservancy grazing committee training which contained many aspects of successful project implementation including planned grazing, tools to manage rangeland, and conflict resolution.

The Project seeks to build the capacity of the project conservancies by filling many of the positions related to project implementation by community members including grazing coordinators, monitoring specialists, field assistants, drivers, interviewers, data entry, and others. Jobs are announced and posted at conservancy headquarters, on the NRT website, and in standard job posting sites. About 45% of NRT staff come from local conservancies, and per the NRT State of Conservancies Report 2020, 37% of all NRT staff are women. Employment of women is above average for the conservancies and pastoralist communities in general.

The validated PD references relevant laws and regulations—such as the National Hospital Insurance Act of 1988 and the 2007 Kenya Occupational Safety Act—and the Project's compliance with them. All NRT staff must sign letters of employment which contain contractual agreements between NRT and the employee.

The validated PD lists project employment opportunities with associated risks and mitigation. NRT's Human Resource Policies and Procedures Manual includes a section on occupational safety and NRT ensures that there are up-to-date health and safety risk assessments, that necessary personal protective equipment is provided, and that arrangements for emergency response and first aid are known.

The verification team concluded that the relationship between workers and the Project upholds the intent and design presented in the validated PD.

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

The project proponent and other parties involved in the Project have a wide breadth of technical and management skills required to successfully implement the Project and have the capacity to implement the Project over its lifetime. All areas of expertise are covered by the project team and project partnerships:

- Northern Rangelands Trust (NRT) is the project proponent and facilitates and coordinates a governance relationship with multiple indigenous communities across the Project. It helps establish conservation activities in the project conservancies. NRT is involved in community engagement, administrative support, livestock management advice, peacemaking and conflict resolution, and monitoring.
- Soils for the Future, LLC (SftF) is a carbon project developer responsible for the design and monitoring of project activities, specifically biodiversity and soil and vegetation monitoring and provides carbon accounting and modelling and grazing management advice.
- The Nature Conservancy facilitates community-based conservation projects in eastern Africa and provides fund raising, administrative support, and social monitoring.
- Native, a Public Benefit Corporation (formerly NativeEnergy) is a project developer and marketer that builds customized projects and purchase agreements with private companies seeking to offset emissions or invest in community development projects. It provides technical support, management support and marketing and sales transactions.
- Grevy's Zebra Trust is an independent wildlife conservation trust in Kenya dedicated to saving the endangered Grevy's zebra. They help educate conservancies on rotational grazing.
- International Centre for Tropical Agriculture provided analyses of soil carbon and plant tissue lignin and cellulose for the Project. They also conducted some soil sampling to determine baseline carbon stocks.

- International Centre for Agroforestry conducted some of the soil sampling used to determine the baseline carbon stocks and developed a remote-sensing based model for estimating soil carbon stocks.

The project proponent, NRT, has adequate funding to support project implementation. The organization has grown substantially since its inception in 2004. Per NRT's Finance Report for 2020, its 2020 budget was US \$14.5 million. Some project implementation costs have also been covered by revenues from credit sales from credits issued for the Project's first monitoring period.

During the site visit, the verification team interviewed project personnel with NRT, Native, Soils for the Future, and Grevy's Zebra Trust. Based on interviews and observations during the site visit and reviews of relevant project documents, the verification team concluded that the project proponent with the project team has the capacity, expertise, and funds to implement the Project in accordance with the validated PD.

4.3.11 Commercially Sensitive Information (Rules 3.5.13 – 3.5.14)

No commercially sensitive information was excluded from the Monitoring Report.

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

The Project has implemented measures to protect the rights of indigenous peoples, communities, and other stakeholders. The details of these measures were reviewed during the Project's validation and there have been no changes.

Per the validated PD and Validation Report, property rights associated with the project area are community-based. Communities occupying government owned land have ownership right to resources. Some project conservancies are registered as Group Ranches under the Kenya Land (Group Representatives) Act of 1968. Other conservancies are located on Trust lands, which grant rights to grazing under customary law granted in the Kenya Trust Land Act of 2010. More recently, the Community Lands Act of 2016 grants rights to resident communities to graze and conduct conservation activities on Group Ranches and Trust lands.

NRT conservancies exist independently of the Project and existed prior to project implementation. NRT conservancies are "local institutions run for and by indigenous people to support the management of community-owned land for the benefit of improving livelihoods", per NRT's website. They were created to support the management of community-owned land for the benefit of livelihoods and work to improve representation for members by building on traditional, indigenous cultural structures. The conservancies are created by members, and NRT is the membership organization owned and led by the community conservancies. For the 2017-2020 monitoring period, 13 conservancies are included in the Project; as of 2023, there were 43 total NRT community conservancies in Kenya and Uganda. This is described in section 2.1.7 of the Monitoring Report.

Participation by conservancies in the Project is voluntary and the Project takes no ownership of lands. Project activities do not lead to the involuntary removal or relocation of property rights holders from their lands or territories and do not force them to relocate activities important to their culture or livelihood. The verification team reviewed samples of Letters of Intent and Consent and

Waiver forms, which exist for each conservancy involved in the Project. Within the Letters of Intent, each conservancy states its acknowledgement and willingness to participate in the Project and states an understanding of what is involved in participation. These agreements were superseded by the Project Implementation Agreement (PIA) signed by NRT and each of the conservancies on 24 June 2021 (which was after the end of this monitoring period). The PIA includes acknowledgement that the participating conservancies are communally owned, used and managed parcels of land and that each participating conservancy shall implement the project activities as described in the agreement. Conservancies agree to continue the project activities throughout the project longevity period, defined as thirty years following the project start date. The PIA also includes details on the following: description, map, and size of the project area; scope of project activities; protection of community land rights; and benefit sharing arrangements.

There is a history of conflict between ethnic groups in the project area based on access and proximity to water leading to encroachment of herders from other conservancies and outside the project area and persistent livestock theft between groups. Conflicts are more likely to occur during droughts. The Project is unlikely to either cause or influence the outcome of these conflicts. Project activities involve movement of livestock according to conservancy or regional grazing plans and conflicts are more likely when herders are not following planned grazing activities. As a result of the Project, there are more game scouts within the conservancies who patrol conservancy borders and deal with conflicts as they arise. Section 4.3.8 of this Verification Report describes in detail how conflicts are related (or not related) to project activities. It includes descriptions of the verification team's assessments of the Project's formal and informal grievance redress procedures, the use of traditional conflict resolution methods consistent with cultural values and norms, the implementation of project activities to reduce the conflicts which have occurred historically in the project area, and the mechanisms used by the project proponent to avoid escalating ongoing or unresolved conflicts.

Aspects of the Project as they relate to the CCB indicators respect for rights to lands, territories, and resources and free, prior, and informed consent were reviewed and validated during the validation of the Project. The verification team interviewed NRT's Director of Governance during the site visit. Based on that interview, interviews with other NRT personnel and project stakeholders, documentation and evidence of ongoing meetings and stakeholder communication (see discussions of Annual General Meetings (AGMs), grazing meetings, and other conservancy meetings in other sections of this Verification Report), and a review of the validation report, the verification team confirmed there have been no changes to how the Project recognizes, respects, and supports rights to lands and resources since validation and the Project continues to inform stakeholders and members of the conservancies about implementation of project activities.

4.3.13 Legal Status (G5.6)

As discussed above in section 4.3.12, grazing rights are granted by land ownership associated with registration as Group Ranches or through conservancy locations on Trust land. Conservancies are legal entities that can sign contracts to benefit from conservation in defined areas. As also described above, NRT conservancies exist independently of the Project and existed prior to project implementation. They are created by members, and NRT is the membership organization owned and led by the community conservancies. The legal status of the Project and the communities' land rights and rights to conduct and benefit from the project activity in the project area were reviewed

as part of the assessment of the project design which was completed during the project's validation, carried out by a VVB other than RCE. As documented in the validation report, the validation team reviewed the PD which includes a list of laws and regulations that are relevant to project activities including those granting ownership and rights to Group Ranches and other project land. The validation report includes details of this review including assessment of conservancy legal rights, detailed reviews of Kenya laws and regulations, and Letters of Intent signed by each conservancy. During the verification of this monitoring period, the verification team also reviewed the Letters of Intent as well as the Project Implementation Agreement (PIA), as discussed in more detail in section 4.3.12 above. These documents demonstrate the project proponent's legal right to control and operate the project.

Depending on the conservancy, grazing rights are conferred through the Kenya Land Act of 1968, the Kenya Trust Land Act of 2010, or the Community Land Act of 2016. At the time of validation, the project was confirmed as meeting the applicable laws. There was no evidence that any changes to property and land use rights occurred during this monitoring period. During this monitoring period, communities continue to exist as Group Ranches under the Kenya Land Act of 1968 or are located on Trust lands under the Kenya Trust Land Act of 2010 and the Community Lands Act of 2016. Grazing rights are also conferred through these acts. The same 13 conservancies that have been part of the project since initiation and validation were still part of the project during this monitoring period. The verification team confirmed that there have been no changes to these laws or to the structures of the conservancies. The verification team also reviewed an attestation from NRT that it complied and remained in compliance with all national laws and regulations.

A comment pertaining to the legal basis of the project was received during the public comment period (see Appendix C for more detail). Seven of the thirteen project conservancies included in the project during this monitoring period were already registered group ranches under the Kenya Land Act of 1968. These have since transitioned to community lands. The conservancies that were not group ranches have transitioned or are in the process of transitioning to the Community Land Act of 2016. The Laikipia and Marsabit County Governments signed letters of no objection to the Project; the verification team reviewed the letters as well as the acknowledgement of receipt of the request for the Letter of No Objection from the Isiolo County Government on 23 February 2022. The verification team observed no evidence of objections from Isiolo County Government in the acknowledgement of receipt or elsewhere.

Labor laws are also applicable to the Project as they relate to NRT's hiring and employment policies. These laws and regulations continue to apply to the Project, and the verification team concluded that there have been no changes since the validation of the Project and there is no evidence that the Project is not complying with relevant laws and regulations.

The verification team concluded that the Project is in conformance with the CCB rules during the monitoring period and that no changes to the project design are necessary .

4.4 Climate

4.4.1 Accuracy of GHG Emission Reduction and Removal Calculations

The Project proponent calculates Project emission reductions in accordance with relevant equations listed in the PD and methodology. RCE reviewed the NDVI analysis used to measure

successful project activity implementation, projections of total project livestock population and emissions, estimates for baseline livestock population and emissions, total project area and a sample of grazing reports to confirm leakage emissions. RCE also reviewed the proponent's emission reduction calculations to verify that appropriate equations were used, that correct emission factors were applied, and that the spreadsheet was functional.

The parameters monitored to estimate the emissions reductions during the second reporting period are listed in table 2 below and are identified in the Monitoring Report. Note that some project parameters listed in the Monitoring Report that are validated inputs into the calculation model to generate total sequestered carbon were not required to be updated for the current reporting period. These parameters are used in the calculation but are not listed here because they have not been updated.

Table 2. Assessment of Parameters Monitored

Parameter	Source	Description	Summary of Review
PA _{m,t}	GIS shapefiles	Project area for each validated stratum (Project area in stratum m)	RCE recalculated the project area use GIS shapefiles and found a miniscule difference (0.4 hectares) in total hectares for each conservancy. Total Project area is 1,993,075 hectares.
GWP _{CH4}	IPCC Fifth Assessment Report	Global warming potential of methane.	RCE confirmed that 28 is the most recent GWP for methane published from IPCC.
W _{c,t}	VM0032 Table 4	Average body weight for animals of a certain category in each reporting year.	RCE confirmed that correct values from Table 4 were used in the calculations.
N _{c,j}	Baseline census and surveys	Baseline number of animals measured by census	RCE confirmed that correct values from the baseline census/survey was used to calculate a projection of animals in each project year.
PN _{c,t}	Household surveys and extrapolated data	Mean number of project animals across project area	RCE reviewed the baseline survey data and formulas used to estimate total animals across the project area and confirmed the values are correct.
DEPTH _{m,j,0}	Measured in the baseline and project at permanent sampling locations throughout the project	Soil core depth	RCE reviewed baseline values entered into the emission reduction spreadsheet and used in the calculation of soil organic carbon sequestration.
BULK _{m,j,0}	Measured in the baseline and project at permanent sampling locations throughout the project	Soil bulk density	RCE reviewed baseline values entered into the emission reduction spreadsheet and used in the calculation of soil organic carbon sequestration.
MAP _m	Databases for relevant geographic areas	Mean annual precipitation in stratum m	RCE reviewed baseline values entered into the emission reduction spreadsheet and used in the calculation of soil organic carbon sequestration
SAND% _{0,m}	Measured in the baseline and project at permanent sampling locations throughout the project	Fraction of soil that is sand	RCE reviewed baseline values entered into the emission reduction spreadsheet and used in the calculation of soil organic carbon sequestration
GI _{j,m}	Measured in the baseline and project at	Mean annual grazing intensity	RCE reviewed baseline values entered into the emission reduction

	permanent sampling locations throughout the project		spreadsheet and used in the calculation of soil organic carbon sequestration
MAPLC _{j,m}	Measured in the baseline and project at permanent sampling locations throughout the project	Mean above-ground plant cellulose plus lignin	RCE reviewed baseline values entered into the emission reduction spreadsheet and used in the calculation of soil organic carbon sequestration
SOILWATER% _{m,j, z}	Measured in the baseline and project at permanent sampling locations throughout the project	Soil water content	RCE reviewed baseline values entered into the emission reduction spreadsheet and used in the calculation of soil organic carbon sequestration
ED _{c,t}	Grazing reports	Number of days non-project livestock encroached on the project area	RCE reviewed methods for tracking whether off-project livestock entered project lands through grazing reports and confirmed that these leakage emissions are accounted for.
DN _{c,x}	Grazing reports	Number of project animals off the project area	RCE reviewed methods for tracking whether off-project livestock entered project lands through grazing reports and confirmed that these leakage emissions are accounted for.
NDVI _{jm,z}	MODIS 15-day composite calculations of NDVI for tile 21,9 which provides NDVI index at 250 x 250 meter resolution following atmospheric corrections and cloud masks.	Vegetations index calculated from MODIS spectral imagery	*See below for assessment of NDVI

The emission reductions are calculated by multiplying total stratum area by the fraction of successful implementation (determined by NDVI analysis and discussed further below) and total carbon removal per stratum. This last parameter was confirmed during the validation of the project and included stratum boundaries, results determining the number of sampling units and allocation among stratum, a cluster analysis, and the SNAP model.

The initial validation confirmed inputs into the total carbon sequestered per acre on a stratum basis. According to the monitoring plan, vegetative cover and composition need to be monitored every 5-7 years to establish a new, reduced grazing intensity and new values for lignin and cellulose in order to calculate the change in soil carbon with the SNAP model. The verification team reviewed the previously validated data inputs for the SNAP model. The model has five parameters: grazing intensity, lignin and cellulose content of aboveground biomass, percent of sand in soil, mean annual precipitation (over the baseline time period) and fire frequency (excluded because fire is exceedingly rare in the project area). These parameters were not required to be updated during the current monitoring period. RCE performed a check on these inputs to confirm there were no computational errors for calculating the total carbon removal on a stratum basis. There were no transcription errors between data sets previously validated and used in the emission reduction calculation.

Next, RCE's GIS team reviewed the GIS data and confirmed that each stratum (conservancy boundary) was calculated correctly. The files were converted to the correct projection and all values

were within 0.4 hectares of Native's calculated hectares per stratum (this difference is miniscule and likely due to issues with converting projections from one format to another).

NDVI Analysis

NRT, assisted by SFTF, confirmed successful implementation of the project activity using Normalized Difference Vegetation Index (NDVI) and as a conservative measurement, subtracted areas from the SNAP soil organic carbon model that were deemed "unsuccessful". If there is a single grazing event during the year as determined through this analysis, then the area is considered to have successful implementation.

VM0032 section 9.3.4 states that grazing intensity could be measured using NDVI. This method uses the ratio between the difference of red and near-infrared bands from satellite imagery to differentiate plant cover from other land covers. NDVI values ran between -1 to 1; higher values indicate a greater percentage of vegetative cover, and lower values indicate bare ground or water. NDVI has even been identified as "sensitive" to changes in leaf area index, canopy type, and canopy architecture. Different models and monitoring procedures with NDVI has been proven reliable for assessing land cover change and landscape dynamics, including estimation of grazing intensity (see monitoring report for citations).

The Project uses satellite imagery with a moderate-low resolution and each pixel from these images represent 6.25 hectares. The values of each pixel are classified accordingly and compared to reference areas that are protected wildlife habitats. MODIS imagery has shown a consistent correlation with vegetation biomass and dynamics in different ecosystems (see monitoring report for citations).

During the initial validation and verification, the Project Proponent demonstrated that measured biomass was correlated with NDVI for each MODIS pixel before and after cattle and sheep herds moved through the area. According to VM0032, the proponent took 30 Forage biomass samples from thirty 0.125 m² quadrats placed randomly inside 30 different pixels in August 2014 and estimated linear correlation between the biomass field measurements and pixel NDVI values. The adjustment of these models was $R^2 = 0.60$ before grazing and $R^2 = 0.56$ after grazing and concur with different scientific articles that assess grazing intensity.

For the classification of pixels as successful (only 1 grazing event during the year) or unsuccessfully grazed, the proponent used 16-day composite NDVI images to analyze the monthly change of NDVI values. A positive value before and after NDVI analysis indicates an increase in vegetative change.

The proponent performed a binary logistic regression model where 0 corresponded to "no grazing event occurred" in that month and 1 corresponded to "grazing activity was detected" by analyzing the change in NDVI values and 116 random points chosen from grazing coordinator's reports from the field. With this model, the Proponent determined that the threshold value of monthly change in NDVI needed to be assessed as successful or unsuccessful (at 50% of probability). The proponent considered the grazing events unsuccessful if the monthly change in NDVI threshold was greater than 0.1.

During the first monitoring period, the Project Proponent considered changes in NDVI thresholds below 0.05 to be a successful implementation of the project activity. However, during the current monitoring period this threshold did not accurately reflect successful grazing implementation primarily due to drought conditions and analysis during the dry season. Even in areas with a single grazing event, the difference in NDVI generated values over the 0.05 threshold. The Project Proponent implemented a Project Description Deviation to account for this.

Also, to mitigate the effect of seasonal changes, SftF used reference areas, where no grazing can occur (for example rhino sanctuary), to subtract the sum of changes in NDVI from the monitored surface of the project area. The fraction of successful implementation was applied to each conservancy area multiplied by total carbon sequestered per hectare of land.

4.4.2 Quality of Evidence to Determine GHG Emission Reductions and Removals

The focus of RCE's calculation review was the NDVI analysis, validated baseline measurements used to develop a reliable model of sequestered soil organic carbon over the reporting period, validated studies to calculate a formula to project total livestock population and a review of any methodology default emission factors. RCE found the evidence provided to be reliable from the sources presented including validated baseline parameters, grazing reports and interviews with grazing coordinators during the site visit. As the data collected was based on surveys and lab analysis of soil samples, there were no monitoring and metering equipment used that would require calibration.

The fraction of successful grazing implementation was considered the most important parameter for accurately calculating emission reductions achieved by the Project. RCE's GIS specialist replicated the NDVI analysis using a computer script in Google Earth Engine and successfully reproduced the fraction of successful implementation across the project area. The GIS specialist also re-calculated the project area using the provided GIS files and found a miniscule difference (0.4 hectares) from the Project's total hectares.

RCE considered the main source of error to be the NDVI analysis and data transcriptions in the calculation spreadsheet. The Project proponent uses several different spreadsheets to track information and manually transcribes some values from one spreadsheet to another. RCE focused on replicating the NDVI analysis to confirm proportion of areas to have successfully implemented project activities and tracing the validated data parameters input into the soil organic carbon sequestration model.

Leakage emissions from off-project and off-conservancy grazing days are significant for the project. Methodology deviation #2 and PD deviation #4 above address the tracking of animals on such a large land scale. Grazing coordinators track herd movement on a monthly basis using grazing reports. These reports are submitted to Native who then interpret the reports using a set of steps described in a separate cover document. The overall population of livestock is estimated using regression equations that calculate increase in livestock population over time. These values are used to calculate total animal grazing days in each conservancy. The total number of off project animal grazing days is divided into total animal grazing days for the year. Off project animal grazing days are estimated through the grazing reports that indicate livestock have moved off their

conservancy or off the project area. Total leakage emissions are then calculated and subtracted from net emission reductions.

Finally, RCE verified that evidence and data used to calculate emission reductions and removals was of sufficient quantity and of appropriate quality to conclude with a reasonable level of assurance that the stated emission reductions in the Monitoring Report for the monitoring period are conservative and accurate. RCE concludes that the sources of information used are reliable, and that the handling and flow of the data through the calculations is correct and traceable.

4.4.3 Non-Permanence Risk Analysis

Table 3. Assessment of Non-Permanence Risks, Internal

Risk Factor	Description	Reason why risk is appropriate	Risk rating
Internal Risks			
Project management	a) Not applicable. RR=0 justified b) Not applicable. RR=0 justified c) NRT and Native have experience in managing conservation concessions. RR=0 justified d) NRT maintains salaried grazing coordinators in each participating conservancy who are trained to help community members plan grazing and manage livestock. RR=0 justified e) NRT, Native and SFTF include individuals with significant experience in AFOLU project design and implementation, carbon accounting and reporting. RR=-2 justified f) A plan for mitigating natural and human-induced risks to safeguard the expected benefits for climate, biodiversity, and communities is described in the CCB Project Description. RR=-2 justified	RCE confirmed that the Project Proponent includes individuals who have extensive experience and that there is a plan in place for safeguarding benefits from climate, communities and biodiversity.	-4
Financial viability	a) Not applicable. RR=0 justified. b) Not applicable. RR=0 justified. c) Not applicable. RR=0 justified. d) According to the cash flow, the breakeven point of the project will be achieved in 2021. RR=0 justified. e) Not applicable. RR=0 justified. f) Not applicable. RR=0 justified. g) Not applicable. RR=0 justified h) Not applicable. RR=0 justified. i) Mitigation: Project has available as callable financial resources at least 50% of total cash out before project reaches breakeven. RR=-2 justified.	RCE reviewed the cash flow for the project and confirmed the breakeven point was in 2021.	0
Opportunity cost	a) Not applicable. RR=0 justified. b) Not applicable. RR=0 justified. c) Not applicable. RR=0 justified. d) Not applicable. RR=0 justified. e) Not applicable. RR=0 justified. f) NPV from project activities is expected to be at least 50% more profitable than the most profitable alternative land use activity. NPV is expected to be 804% more profitable than the most profitable alternative land use activity. RR=-4 justified. g) NRT and TNC are both non-profit organizations. RR=-2 justified. h) Not applicable. RR=0 justified. i) Not applicable. RR=0 justified	RCE reviewed the financials and confirmed that project activities are more profitable than alternative land use. RCE also confirmed that the Project Proponent is a non-profit organization.	-6
Project longevity	a) Not applicable. RR=0 justified.	RCE reviewed the non-permanence	15

	b) See VCS Non-Permanence Risk Report for full justification. The baseline activity is harmful to the environment. The project activity is improving the environment and to stop the activity would be in violation of §30 of the Kenya Wildlife Conservation and Management Act of 2013. RR=15 justified.	risk report and agrees that the baseline activity is harmful to the environment.	
Total Internal Risk (PM + FV + OC + PL) Total may not be less than zero.		5	

Table 4. Assessment of Non-Permanence Risks, External

Risk Factor	Description	Reason why risk is appropriate	Risk rating
External Risk			
Land Tenure and Resource Access/Impacts	a) Not applicable. RR=0 justified. b) Project participants are communities organized into Conservancies with full rights authorized. RR=2 justified. c) Not applicable. There are local disputes which are temporary and do not involve chronic disputes over land. RR=0 justified. d) Individual herders from different ethnic groups occasionally have disputes with each other over access to grazing or water. RR=5 justified. e) Not applicable. RR=0 justified. f) Land is managed as a conservancy. RR=-2 justified. g) Not applicable. RR=0 justified.	RCE interviewed project personnel during the site visit and confirmed that there is occasionally disputes between herders over access to grazing or water.	5
Community Engagement	a) Each conservancy is represented by a manager and grazing coordinator who regularly contact herders. Public notices are posted on a regular basis. RR=0 justified. b) Not applicable. RR=5 justified. c) The project seeks certification against the CCBS. RR=-5 justified.	RCE reviewed evidence that public notices are posted on a regular basis (including viewing this evidence during the site visit)	0
Political Risk	a) Not applicable. RR=0 justified. b) Governance score of -0.79 to less than -0.32. RR=4 justified. c) Not applicable. RR=0 justified. d) Not applicable. RR=0 justified. e) Not applicable. RR=0 justified. f) Kenya has 16 CDM Afforestation/Reforestation Projects and a Designated National Authority. RR=-2 justified.	RCE reviewed the citation for Kenya's governance score and confirmed it was less than -0.32.	2
Total External Risk (LT + CE + PC) Total may not be less than zero.		7	

Table 5. Assessment of Non-Permanence Risks, Natural

Risk Factor	Description	Reason why risk is appropriate	Risk rating
Natural Risk			
Fire	Risk rating =1 is justified and explained in the PD.	RCE confirmed during the site visit	1

		that the risk of fire is low based on the annual rainfall and vegetative production.	
Pest and Disease Outbreaks (PD)	Risk rating =0. Disease is not likely to result in any losses of carbon stocks. The project occurs on native, diverse savanna, and any disease agents that might affect tree or grass species will likely have negligible effects due to their complex leaf chemistry: Salih et al 2017. Tannins, flavonoids and stilbenes in extracts of African savanna woodland trees Terminalia brownii, Terminalia laxiflora and Anogeissus leiocarpus showing promising antibacterial potential. South African Journal of Botany 108: 370-386 (not open source, included in supporting documents). Livestock diseases, such as tick-transmitted diseases like Theileriosis, would reduce livestock grazing impacts and likely boost soil carbon rather than decrease it.	RCE agrees that this is a low risk for the project type. It is unlikely that disease or pest outbreak could have a significant impact on SOC accumulation over the life of the project.	0
Extreme Weather	Risk rating =2. Mitigation =0.5. Drought results in small reductions in soil carbon due to the need for soil microbes to access stored carbon stocks when lack of rain decreases new soil carbon inputs. However, project activities restore soil carbon to degraded soils and increase water-holding capacity.	RCE confirmed via interviews during the site visit that drought conditions are unlikely to impact SOC accumulation over the life of the Project.	1
Geological risk	This area is considered geologically inactive over a 100 year timescale.	RCE reviewed information provided and agrees that geological disasters are a low risk for the Project area.	0
Natural Risk-Climate Change	Soil carbon is not strongly sensitive to variation in weather, especially in grazed ecosystems.	RCE review information provided and confirmed that accumulation of SOC due to project activities is not strongly sensitive to variation in weather.	0.5
Total Natural Risk (as applicable, F+PD+W+G+ON)		2.5 (rounded to 3 according to directions in the risk tool)	

The non-permanence risk deduction to be applied for the Project is 15%. This is a decrease from the previous monitoring period risk deduction of 16%. The verification team reviewed the information provided in the Non-Permanence Risk Report and confirmed that it is consistent with the supporting documents and evidence provided to support each of the ratings assigned to each

risk factor. The verification team deems the information provided reliable and confirms the overall risk rating of the Project.

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

The Project disseminates the monitoring plan and results of monitoring to conservancies and other project stakeholders. The results of monitoring for social, vegetation, and wildlife components of the project, which each have their own community-based management system (CoMMS), also discussed elsewhere in this report, are provided to conservancies. The verification team confirmed this with NRT's Monitoring Evaluation Manager during the site visit. Information is shared with community members within the conservancies both formally and informally. As discussed above under stakeholder consultation and access to information, meetings are held periodically to communicate information about the Project to local communities.

The NRT Rangelands Strategy and Policy Director also communicates to grazing coordinators the importance of following grazing plans. The Director periodically visits tribes and presents easy to understand graphics that clearly show how each conservancy is performing. Graphics include bar charts showing the correlation between the NDVI analysis and precipitation which combined represents which conservancies are successfully following the grazing plans accepted by the communities.

Based on interviews conducted with community members and other stakeholders during the site visit, there is a reasonable understanding of the Project within the conservancies and the communications structure is sufficient to communicate project information including climate monitoring.

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

The project activities include measures intended to support and assist communities in adapting to the impacts of climate change. The project area includes several community High Conservation Values that are threatened by climate change, as described in more detail in the Monitoring Report: sustaining livelihoods and cultural identity of indigenous groups, supporting economic viability on traditional livestock grazing lands, providing ecosystem services, and providing regional peace and security. A significant impact of the Project is to rebuild SOC which results in increased infiltration and retention of precipitation in shallow soil layers, higher quality forage available for more months during dry seasons, longer periods of livestock reproduction resulting in milk supply to households year-round, greater retention of surface water to allow greater mobility of livestock, and greater allocation of livestock to cattle and away from sheep and goats.

The validation for the Project confirmed that the measures implemented by the Project will assist in climate change adaptation. The verification team verified that the Project continues to implement the project activities that will help communities and biodiversity adapt to the impacts of climate change. The Project monitors the results of measures intended to assist local communities in adapting to the impacts of climate change. The principal monitoring tool is MODIS NDVI which the Project established correlates strongly with forage biomass and can be used to assess livestock impacts on forage biomass and the successful implementation of one grazing event per year. Soil water percentage is measured at permanent sampling stations and helps determine whether soil

moisture is increasing during the project lifetime. The verification team confirmed that the Project is monitoring these parameters.

To assess NDVI scores for the monitoring period, the verification team began by rerunning the provided Google Earth Engine script that was originally used to determine the cumulative NDVI change and the proportion of each conservancy area that had unsuccessful implementation each year using a NDVI difference threshold of 0.1. These proportions of unsuccessful areas for each conservancy area were recalculated and assessed by the verification team. The team confirmed that the proportional values produced by the script matched those originally given with no significant differences.

The team then reproduced NDVI scores for each year. The “interpretation” of these scores is the fraction of successful grazing in each conservancy that is multiplied by total carbon stocks. The effect is adjusting carbon stocks by how successful grazing activities were based on the NDVI analysis described above and in detail in the Monitoring Report.

The verification team concluded that the project activities implemented, mainly rotational grazing to decrease grazing intensity across project lands deliver the intended impacts.

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

The section above lists indicators for adaptation benefits including increased infiltration and retention of precipitation in shallow soil layers, higher quality forage available for more months during dry seasons, longer periods of livestock reproduction resulting in milk supply to households year-round, greater retention of surface water to allow greater mobility of livestock, and greater allocation of livestock to cattle and away from sheep and goats.

The verification team reviewed the results of Social CoMMs surveys conducted in five project conservancies during the monitoring period against the results of surveys conducted during the baseline monitoring period (2014 and 2015) which indicated that during this monitoring period:

- More respondents owned cattle,
- More respondents had access to milk,
- More respondents believed that grazing lands were good or very good, and
- More respondents traveled less than 2 hours to water

Results are shown in Table 12 in the Monitoring Report. These results all demonstrate positive impacts of project activities on the indicators listed above. Social CoMMs are an assessment of impacts of project activities on communities by the affected communities. Sections 4.3.4 and 4.3.5 of this verification report provide additional detail on Social CoMMs.

The verification team concluded that project activities implemented assist communities in adapting to the probable impacts of climate change.

4.5 Community

4.5.1 Community Impacts (CM2.1)

The Project's community impacts result from improved rangeland health due to increased SOC. Related impacts include more widely distributed and longer-lasting surface water sources; increased financial capital to support infrastructure, education, and health care; enhanced infrastructure to provide more sustained employment, food security, and transportation; gains in human capital through increased access to education, improved infrastructure, and training and employment opportunities; and enhanced social capital from cooperation and coordination among conservancies to implement grazing plans.

While no revenues were shared during the 2017-2020 monitoring period because the Project's first VCUs were not issued until early 2022, based on observations during the site visit, the Project revenues distributed to conservancies from the NRT Pooled Conservancy Fund after the end of this monitoring period are already having a positive impact on the communities. This will need to be reviewed in more detail during the verifications of future monitoring periods to assess the implementation of the benefit sharing mechanism. As discussed elsewhere in this report, during the site visit one verifier attended the Melako Conservancy AGM during which community members in the Melako Conservancy voted on how to spend the project revenue within their conservancy. They voted to spend the money on bursaries to provide school fees for local children to attend school. The verification team's assessment of benefit sharing mechanisms is also discussed below in section 4.5.12.

The verification team also reviewed the results of Social CoMMS conducted since project implementation compared to the baseline monitoring. The Monitoring Report shows results of some of the parameters monitored in section 4.1, demonstrating that the Project contributes to positive change in community well-being including benefits to women and to the poorest 25% of people.

Based on the results of ongoing monitoring of project impacts, other observations during the site visit, and information collected during interviews with project stakeholders and members of the communities, the verification team concluded that the Project is positively impacting the local communities. These impacts are likely to increase over the life of the Project.

4.5.2 Negative Community Impact Mitigation (CM2.2)

The Project has taken action to mitigate negative well-being impacts on communities. Potential negative impacts include the following:

- Increased migration with livestock may increase conflicts with other ethnic groups and livestock theft. Project mitigation activities include rapid response teams, regional grazing plans, facilitation of shared grazing agreements and peace meetings, and better communication between grazing coordinators and game scouts to facilitate conflict resolution.
- Family members being away from home for longer periods in response to drought and forage availability. Project mitigation activities include proper management of rangelands leading to recovery of vegetation in home conservancies.

- Carbon revenues may be used to buy more livestock, creating little net positive benefit. Project mitigation activities include mechanisms to decide how revenue is distributed and spent (i.e. at open community meetings) with distributions mostly for public goods.

Through interviews with NRT; reviews of documentation including grazing plans, minutes from grazing meetings and peace meetings, and a report compiled by a conservancy manager following a conservancy peace meeting during the December festive season when there were zero raids reported as a result of improved relationships and networking between ethnic groups; and interviews with conservancy leaders and community members, the verification team evaluated the Project's mitigation actions. The team concluded that mitigation actions have been implemented in accordance with the validated PD.

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

As discussed in section 4.5.1 above, the Project provides net positive impacts on community groups. The Monitoring Report provides specific examples including greater income, increased cattle ownership, decreased child illness, increased access to milk, and increased security. Refer to section 4.5.1 for the verification team's review of impacts to community well-being. The verification team concluded that the Project provides net positive impacts to community groups.

4.5.4 Protection of High Conservation Values (CM2.4)

The Project identified four community High Conservation Values (HCVs) including sustaining livelihoods and cultural identity of indigenous groups, supporting economic viability on traditional livestock grazing lands, providing ecosystem services, and regional peace and security. As described elsewhere in this report, project activities positively impact community well-being including these HCVs.

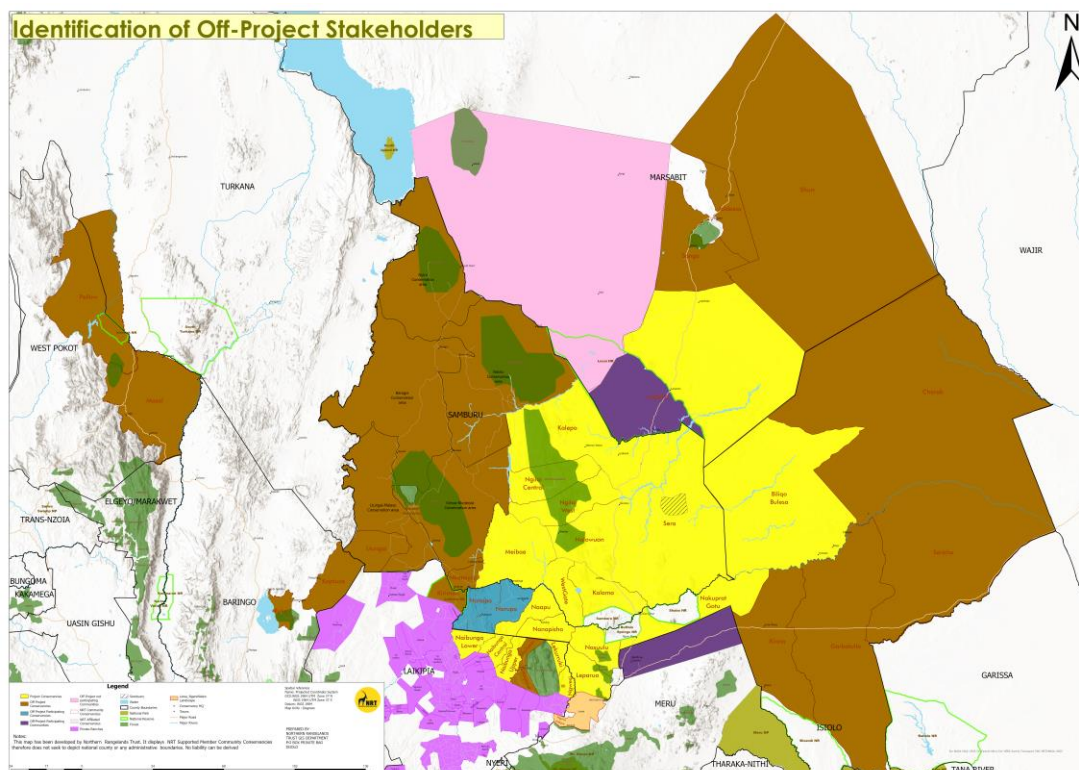
The verification team observed firsthand during the site visit that the Project sustains livelihoods and cultural identity of indigenous groups and supports economic viability on traditional livestock grazing lands by visiting project conservancies and interviewing community members. Through interviews with community members and NRT, the team also verified that the Project does not negatively impact the provision of ecosystem services and regional peace and security and that the Project has demonstrated positive impacts to these two HCVs as demonstrated by the results of Social-CoMMS.

The verification team concluded that the community HCVs identified by the Project are not negatively affected by project activities.

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

The Project identified impacts on other stakeholders such as offsite stakeholders including off-project conservancies, off-project ethnic groups, and off-project communities. The processes used to determine stakeholders affected by the Project are described in section 2.1.8 of the validated PD which included meetings in towns in four different counties; the affected stakeholders are identified in section 2.1.9 of the validated PD and shown in figure 1 below.

Figure 1. Off-Project Stakeholder Map Provided by Project Proponent



The verification team confirmed that the project proponent made efforts to engage with off-project stakeholders affected by the Project. Methods included:

- Peace meetings, including participants from on and off-project areas (agendas and minutes provided by project proponent).
- Rapid response teams to help avoid and/or resolve disputes.
- County meetings to provide a forum for the discussion of negative impacts for off-project stakeholders due to the project activities.
- Council of Elders meetings (representatives of off-project conservancies and some representatives of non-participating communities were present).
- Regional and inter-conservancy grazing meetings.
- Herder's engagement meetings with communities and conservancies.

The Project also implemented measures to mitigate negative well-being impacts on these stakeholders during the development of its regional grazing plans to manage grazing across project conservancies during droughts and extended dry seasons. The verification team reviewed samples of the plans, which are the products of annual county-wide meetings to discuss and plan for any grazing changes. The verification team reviewed NRT's Half Year Reports and State of Conservancies Reports which document peace meetings occurring in and outside community conservancy boundaries, trainings held for peace ambassadors, and establishment of peace committees. The verification team also interviewed NRT's Head of Peace and Security during the site visit who explained the Project's measures that have been implemented to mitigate negative well-being of project stakeholders and other stakeholders.

Potential negative impacts from the Project on these stakeholders are identified in sections 2.1.8, 2.1.9, 4.3.1 and 4.3.2 of the PD, as well as section 4.3 of the Monitoring Report for this monitoring period. The main areas of potential impact to these groups are encroachment of animals on- or off-project and increasing historical tensions between on- or off-project ethnic groups. The project proponent made efforts to mitigate these potential negative impacts, including:

- Implementing regional grazing plans (section 4.3 of the MR). Regional grazing plans can help mitigate impacts during droughts or long dry seasons and can also help with movements of herds from outside the project to limit encroachment.
- Shared grazing agreements between on-project groups and off-project groups (communities and private landowners), which help limit encroachment and can provide compensation for any issues.
- Continuation of peace meetings between on- and off-project groups
- Improving communication between grazing coordinators and community rangers to limit conflicts and develop solutions.

As described in the validated PD and the Monitoring Report for this monitoring period, the project proponent seeks to ensure that the Project does not negatively impact stakeholders, including off-project stakeholders, or cause any net harm. The verification team reviewed evidence to support this assertion including:

- Council of Elders meeting minutes which document the presence of representatives from off-project conservancies and non-participating communities at meetings occurring during this monitoring period. There is no evidence of objections or issues raised by these groups during the meetings.
- Letters of No Objection from County Governments including letters from the same four counties that were targeted during the initial stakeholder consultation meetings (Samburu County, Isiolo County, Marsabit County, Laikipia County). These counties represent multiple stakeholder groups (off-project conservancies, non-participating communities, on-project conservancies, and communities). The most recent letters are from February 2022.
- A letter from NRT stating that neither NRT nor its member community conservancies have received any direct letter of complaint or grievance from any off-project stakeholder that would provide or suggest any evidence of harm resulting from the Project since Project inception.
- Meeting minutes from regional and inter-conservancy grazing meetings which are held to communicate issues and mitigate conflicts.
- Grazing agreements for utilization of grazing on private conservancies and/or ranches which allow flexibility in grazing patterns and limit potential conflicts.

Given the size and scale of the Project and its stakeholders on and off-project, it is understood that negative impacts in some form are unavoidable. The project has sought and made numerous efforts to mitigate these potential negative impacts for both on- and off-project stakeholders. The verification team confirmed that the project proponent has implemented a variety of mitigation measures for off-project stakeholders. Mitigation measures include:

- Peace meetings which include participants from on and off-project areas.
- Herder's engagement meetings with communities and conservancies.

- Grazing plans developed by on-project stakeholders to limit livestock movements onto off-project areas.
- Grazing by-laws signed by Community Land Management Committees to account for both on and off-project areas.
- Project conservancy grazing agreements with off-project private conservancies.
- County meetings which provide a forum to discuss negative impacts for off-project stakeholders as a result of project activities.
- County government rangelands bills, for which development is still underway; however, these bills will look at landscape approaches to natural resource management, covering both on- and off-project areas.

The verification team reviewed samples of meeting agendas and minutes and grazing plans and agreements.

The verification team concluded that the Project effectively implemented measures to mitigate negative well-being impacts on other stakeholders and that there's no evidence of negative net impacts on these groups. In its assessment of other stakeholder impacts, the verification team also considered the Project goals in the region and its potential impact. In the absence of the Project, livestock and grazing practices in the region would likely continue to drive a cycle of poverty associated with continuous grazing, loss of soil organic matter, and decreased forage production. The Project provides an incentivized and coordinated platform to mitigate the pre-project conditions such as conflict over dwindling natural resources. While there is a possibility for conflicts or issues to arise amongst project stakeholders, overall, the project has provided net positive impacts across the region on a landscape scale. The project proponents recognize the need for continuous improvement and assessment and have committed to improving stakeholder consultation and monitoring processes in the future.

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

The Project monitors community impact of the Project on key groups (herders, elders, women, and the poorest 25%, among others) by collecting social data through three types of surveys: key informants, focus groups, and household surveys. The PD does not specify the frequency of community social monitoring.

The Project relies on NRT's Social-CoMMS surveys. During the site visit, the verification team interviewed NRT's Monitoring Evaluation Manager about the Social-CoMMS surveys conducted in the conservancies as part of baseline data gathering and ongoing data gathering processes. Topics included survey procedures, survey questions and areas of focus, development of the surveys, training for community members giving the surveys, and results. The results of the Social-CoMMS surveys are incorporated into grazing plans, community education efforts, and communication priorities. NRT also maintains a Social-CoMMS Guide to socio-economic monitoring in NRT member community conservancies.

Baseline Social-CoMMS surveys were conducted in 2013 and 2014 and Social-CoMMS surveys conducted as part of ongoing project monitoring were conducted in seven project conservancies in 2016 and six project conservancies in 2020. The monitoring procedures are discussed in detail in the validated PD and the Monitoring Report, and summary results and highlights from the surveys

are presented in the Monitoring Report including comparisons of baseline and project survey results. In summary, between baseline and project surveys, a higher proportion of households reported increased income over the previous year and ownership of cattle but lower incidence of illness. Climate change adaptation also increased, as the proportion of households with access to milk increased by 20% and time spent gathering water declined.

Because the Project is validated to the Gold Level for exceptional community benefits, the verification team also verified that the results of monitoring include impacts on the well-being of community members, including women.

The verification team concludes that community monitoring was carried out in accordance with the validated PD and that community social monitoring will effectively assess positive impacts of project activities on community HCVs.

4.5.7 Community Monitoring Plan Dissemination (CM4.3)

The Project intends to disseminate results of community monitoring at annual conservancy-wide meetings. Project proponents described methods to communicate results including annual feedback sessions for monitoring, which occur separately from AGMs and other quarterly meetings, and that results of Social-CoMMS are shared annually with conservancies and then shared with conservancy boards and members at their meetings. The verification team also reviewed other means of communicating results including NRTs 2020 Annual Report published on its website which includes summary results of the Social-“CoMMS”.

The verification team concludes that community monitoring was carried out in accordance with the validated PD.

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

The Project generates short-term and long-term net positive well-being benefits for community members. As discussed above, the Project has positively impacted community members including women and the poorest 25% of people. As described in the PD and Monitoring Report, benefits to well-being include increased employment, greater cash flow, better food security, and more consistent milk availability. The verification team reviewed the results of Social-CoMMS household surveys—shown in the Monitoring Report in section 4.1—demonstrating positive results for monitored parameters. Examples include female-led households reported increases in family income more frequently and perceived improved security; men and women reported increased access to milk; and project conservancies employed 30% more people.

The verification team also witnessed benefits derived from the distribution of Project revenues to communities during the site visit.

The verification team concluded that the Project already generates and is on track to generate additional short-term and long-term net positive well-being benefits for community members.

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

The Project identified few risks to community members participating in project activities compared to risks existing in the baseline scenario. They are the same risks listed above in section 4.5.2 of this verification report. The Project manages risks to community members by holding regular community meetings to discuss grazing management options and to inform herders of grazing conditions and risks of migrating with livestock and to allow community members to participate in grazing plans and to express concerns.

The verification team concluded that by holding regular meetings to communicate project information and conditions to community members and to allow them to voice concerns and participate in decision-making, the Project adequately manages risks.

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

The Project benefits two marginalized community groups: ethnic minorities and the poorest 25% (people with few or no livestock). As discussed elsewhere in this report, the verification team reviewed the results of Social-CoMMS household surveys—shown in the Monitoring Report in section 4.1—demonstrating positive results for monitored parameters. One example is an increase in employment among the poorest 25% from 5% in the baseline scenario to 12% in the project scenario.

The verification team also observed benefits during the Melako Conservancy AGM during which members of the community voted to spend the project revenue on bursaries to provide school fees for the poorest local children to attend school; this will directly benefit the poorest 25% of community members. Conservancies are also likely to vote to spend project revenues on community-wide infrastructure such as rainwater collection and storage or wells; water infrastructure was the second choice in voting during the AGM.

The Project does not anticipate negative impacts to these marginalized groups as the result of project activities nor does it anticipate barriers or risks that prevent benefits going to these groups. Conservancies have emphasized including all groups—such as ethnic minorities—in planning meetings and decision-making.

The verification team concluded that the Project fulfilled the requirements for marginalized and/or vulnerable community groups.

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

The Project generates net positive impacts on the well-being of women including increased access to employment, training, and education; involvement in decision-making; and the same benefits to rangeland conditions, livestock health, and food security as described in general for all community members. As discussed elsewhere in this report, the verification team reviewed the results of Social-CoMMS household surveys—shown in the Monitoring Report in section 4.1—demonstrating positive results for monitored parameters related to women such as increased access to milk.

The verification team observed the attendance of women at the Melako Conservancy AGM and their participation in voting on how to spend the project revenue in that conservancy and interviewed women conservancy board members.

The verification team concluded that the Project generates net positive impacts on the well-being of women and that women both participate in and influence decision making.

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

The Project's revenue distribution plan is described in detail in the PD. The initial review and assessment of the project design was completed during the project's validation, which was carried out by a VVB other than RCE. As part of the verification for this monitoring period, the verification team confirmed that project information is routinely communicated to stakeholders and members of project conservancies via meetings; printed documents and public postings; emails, calls, and texts; and postings on the NRT website.

The verification team reviewed documentation and conducted the site visits using a sampling approach. The verification team reviewed evidence of information sharing and meetings conducted for a sample of project conservancies. Similarly, during the site visit, the verification team visited a sample of project conservancies (3) to observe a conservancy-wide meeting and to interview community members in the conservancies about project impacts, project information communication, project revenue sharing, and general feedback on project implementation. During the verification process and verification site visit, the verification team observed no evidence of objections to the project design and the revenue-sharing structure of the project during the monitoring period by inhabitants of the project conservancies. NRT confirmed that it received no project grievances from conservancies/ conservancy members during the monitoring period.

The verification team observed the Melako Conservancy AGM and community member voting to determine how revenues from the sale of credits from the previous monitoring period are to be spent in that conservancy. During the AGM, details of the project and the process for sharing revenues equally among conservancies were communicated to attendees. During the AGM, conservancy members voted to spend the revenue on bursaries to provide school fees for local children to attend school. While the revenue sharing observed during the site visit occurred after the end of the 2017-2020 monitoring period, the verification team deems its observations of revenue sharing during the site visit as meaningful to the verification for the 2017-2020 monitoring period because they demonstrate members' of the project conservancies and stakeholders' participation in the decision-making process and understanding of project benefits.

The revenues shared were associated with the sale of VCUs from the Project's first monitoring period (2013-2016) which were issued in January 2022

The verification team interviewed NRT personnel about the revenue distribution plan. The distribution plan was a topic that arose frequently without prompting during interviews with community members and stakeholders, indicating its significance as an important benefit to the communities.

All observations by the verification team were consistent with the description of the revenue distribution plan in the PD and its implementation as described by NRT and community members.

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

The Project's governance structure links NRT to conservancy leaders, to Council of Elders, and to households. The structure allows all stakeholders to participate in project activities and the formation of grazing plans including underrepresented groups, households with few livestock, women, and minorities. The voices of the communities/conservancies are represented by the leaders they elect. All community conservancies, whether in community land or trust land, conduct democratic elections for their conservancy board of directors. Leadership changes every three years. Regular meetings are held at the conservancy and regional levels, including quarterly grazing meetings and annual general meetings (AGMs) in each conservancy during which information about livestock grazing plans and monitoring, project benefits, and general project information is communicated.

This full and effective participation of all stakeholders and community members was evident from the verification team's observations during site visit interviews with community members, conservancy rangeland coordinators, grazing chairmen, and conservancy board members and attendance at the Melako Conservancy AGM.

The verification team concluded that the Project's governance and implementation structures enable full and effective participation of community members in project decision making and implementation.

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

The Project helped develop the capacity of community members, including women and minorities, to participate in project activities. Community members are encouraged to participate in the development of conservancy grazing plans and attend annual meetings. This was evident from the verification team's observations during site visit interviews with community members, conservancy rangeland coordinators, grazing chairmen, and conservancy board members and attendance at the Melako Conservancy AGM. Conversations with NRT personnel also informed that community members are provided employment by project activities including as rangeland coordinators, game scouts, surveyors for vegetation and social surveys, and field assistants.

The verification team concluded that the Project develops the capacity of all community members and relevant organizations to participate effectively and actively in the project design, implementation, and management.

4.6 Biodiversity

4.6.1 Biodiversity Changes (B2.1)

The Project claims changes in biodiversity expected from the project activities including increased populations of trigger species—including threatened and endangered species, increased richness and diversity of indicator species, and stabilizing populations of species associated with sky island forest reserves. Per the PD, surveys of key indicator species will take place every three years in five biodiversity monitoring platforms. The Project conducted baseline surveys in 2014 and did not conduct project surveys again until 2021, which is after this monitoring period. The Project

Proponent listed the gap in surveying as a change to the PD in the Monitoring Report. As a result of this deviation from the monitoring plan, the data set to demonstrate the Project's impacts on biodiversity—according to the monitoring plan in the validated PD—was incomplete for this monitoring period. Because of this, the verification team did not conduct biodiversity verification activities during the site visit—as detailed in section 2.5 of this verification report—except to interview NRT personnel and Grevy's Zebra Trust about the Project's biodiversity monitoring methods and surveys and trends in wildlife populations.

The verification team reviewed the results of other monitoring including results from NRT's ranger-based monitoring program, the Wildlife Conservancy Management Monitoring System (Wildlife CoMMs), as documented in NRT's Status of Wildlife Report 2005-2019: most project conservancies saw increases in populations or stable populations of the three umbrella species since the start of the Project. These results demonstrate increases in or stable populations of trigger species. Detailed results are shown in the table in section 4.6.13 of this verification report. The use of these results to demonstrate biodiversity changes attributable to project activities is reasonable. The verification team's review of the Project's biodiversity monitoring plan is discussed in more detail below in section 4.6.11. While the Project's assertions of biodiversity benefits are justified, it is still early in the lifetime of the Project and significant changes are more likely to be demonstrated in future monitoring periods. The verification team concluded that the implementation of the Project has generated and is on track to generate positive biodiversity benefits in accordance with the validated PD.

4.6.2 Mitigation Actions (B2.3)

The Project recognized potential negative impacts on biodiversity and the measures taken to maintain and/or enhance High Conservation Value attributes. One potential negative impact from the project would be on biodiversity in the Mathews Forest Reserve which would occur if herders were tempted to move livestock into the Reserve while other project rangeland is resting from grazing per established grazing plans. The risk for this impact decreases (and is expected to disappear) through the life of the Project as planned rotational and seasonal grazing produces more substantial and extensive grass banks. The Project identified other unmitigated negative impacts on biodiversity outside the project area including continued rangeland degradation and depletion of biodiversity, wildlife poaching, lack of wildlife protections, and conflict over limited forage; however, it identified how these impacts are mitigated by the Project within the project area.

The verification team reviewed unmitigated negative impacts on biodiversity outside the project zone as described in the Monitoring Report and the comparison with the Project's biodiversity benefits within the project area. Through interviews with NRT and reviews of documents such as NRT's Status of Wildlife Report 2005-2019, The verification team verified that inside the project area, wildlife numbers have already increased due to the implementation of project activities such as rangeland restoration, funding for community conservation and monitoring activities, and community-based protection and law enforcement.

The verification team concluded that the Project accurately identified potential negative impacts of the Project on biodiversity and identified mitigation measures which it has begun to implement in accordance with the PD. While negative impacts on biodiversity may remain unmitigated outside

the project area, the verification team agreed with the project proponent's conclusion that the Project has a net positive biodiversity impact.

4.6.3 Net Positive Biodiversity Impacts (B2.2)

As described above in section 4.6.1 of this verification report, the Project did not conduct surveys of key indicator species in accordance with its monitoring plan during this monitoring period. As a result of this deviation from the monitoring plan, data to demonstrate the Project's impacts on biodiversity was limited for this monitoring period. Because of this, the verification team did not conduct biodiversity verification activities during the site visit—as detailed in section 2.5 of this verification report—except to interview NRT personnel and Grevy's Zebra Trust about the Project's biodiversity monitoring methods and surveys and trends in wildlife populations. However, based on interviews with NRT and other project stakeholders and document reviews, the verification team confirmed that the Project is already demonstrating positive biodiversity benefits in the project area.

The verification team reviewed the results of monitoring as documented in NRT's Status of Wildlife Report 2005-2019: most project conservancies saw increases in populations or stable populations of the three umbrella species—reticulated giraffe, Grevy's zebra, and beisa oryx—since the start of the Project. The Monitoring Report also includes heat maps for these and other species during the baseline and project scenarios. Furthermore, the Sera Rhino Sanctuary within the project area in Sera Conservancy has seen average population growth of approximately 14% per year since it was established in 2015. The verification team also interviewed the Director of Programs for the Grevy's Zebra Trust during the site visit who confirmed that project areas are seeing positive trends in management of land, restoration of perennial grasses in degraded areas, increased wildlife populations, and interest from the communities in project activities.

The verification team concluded that while it is still early in the life of the Project, the net impact of the project activities on biodiversity within the project area are positive.

4.6.4 High Conservation Values Protected (B2.4)

The Project identified biodiversity High Conservation Values areas within the project area including the Mathews Range and Mukugodo Forest. Project activities to manage grazing reduce livestock incursion to these areas. The project uses satellite-based assessments of livestock impacts using MODIS imagery and calculations of NDVI to assess impacts by the Project. The Monitoring Report shows that livestock monitoring data and analysis of satellite imagery for relative change in NDVI for 2011-2012 (Baseline) and the first part of the crediting period (2013–2020) indicate a clear reversal of trend in reducing encroachment into the Mathews Forest. The verification team reviewed data presented by the project proponent that demonstrate that project activities reversed a trend of increasing use of the Mathews by livestock during the baseline period. The average area experiencing net negative impacts during this monitoring period was less than the previous monitoring period.

This data, therefore, sufficiently demonstrates that the High Conservation Value area, Mathews Range, has not been negatively affected by Project activities.

4.6.5 Invasive Species (B2.5)

The Project's Monitoring Report states that no invasive species have been introduced into the project area nor have established invasive species spread as a result of project activities. During interviews with community members and other stakeholders during the site visit, the presence of *Acacia reficiens*, a historically occurring invasive species, came up during many conversations. While not a specific project activity, community members described removing this species as part of rangeland rehabilitation activities in the project conservancies and reseeding native perennial grasses, motivated by the community's interest in the Project and restoring rangeland health.

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

The Project activity involves rotational grazing and no foreign species are planted in order to increase soil organic carbon across the Project area. One of the Project coordinators on-site stated that seeds of native species are collected and planted in fenced areas near villages. The PD and Monitoring Report state that the Project will not introduce any non-native species to the project area and thus there are no impacts of non-native species due to the Project. The verification team did not observe any evidence that the Project introduced non-native species during the monitoring period.

4.6.7 GMO Exclusion (B2.7)

The Project activity involves rotational grazing and as such does not rely on physical or chemical inputs to achieve the goal of increasing soil organic carbon across the Project area. The PD and Monitoring Report state that the Project will not introduce any GMOs to the project area and thus there are no impacts of GMOs due to the Project. The verification team did not observe any evidence that the Project introduced GMOs during the monitoring period.

4.6.8 Inputs Justification (B2.8)

The Project activity involves rotational grazing and as such does not rely on physical or chemical inputs to achieve the goal of increasing soil organic carbon across the Project area. The PD and Monitoring Report state that the Project will not use fertilizers, pesticides, or other inputs in the Project area and thus there are no impacts of these inputs due to the Project. The verification team did not observe any evidence that the Project introduced these inputs during the monitoring period.

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

The project proponent reported that to its knowledge, there have been no negative offsite biodiversity impacts directly related to project activities during this monitoring period. During interviews with NRT, project stakeholder, conservancy leadership, and members of the community, the verification team observed no evidence of negative offsite biodiversity impacts resulting from the implementation of the project activities.

As discussed above in section 4.3.2, the Project recognized potential negative impacts on biodiversity and the measures taken to maintain and/or enhance High Conservation Value attributes. One potential negative impact from the project would be on biodiversity in the Mathews Forest Reserve which would occur if herders were tempted to move livestock into the Reserve

while other project rangeland is resting from grazing per established grazing plans. As described above in section 4.6.4 of this verification report, the verification team reviewed impacts data from MODIS imagery and calculations of NDVI that demonstrates that project activities reversed a trend of increasing use of the Mathews by livestock during the baseline period and thus has positively impacted the Mathews Forest Reserve.

The project proponent estimates that any potential negative effects should be temporary and produce few lasting effects on biodiversity. The Project identified other unmitigated potential negative impacts on biodiversity outside the project area including continued rangeland degradation and depletion of biodiversity, wildlife poaching, lack of wildlife protections, and conflict over limited forage; however, in the Monitoring Report for this monitoring period it identified how these impacts are mitigated by the Project within the project area to achieve a net positive impact. This is discussed in more detail above in section 4.6.2 of this verification report.

The verification team concluded that the Project accurately identified potential negative impacts of the Project on biodiversity and identified mitigation measures which it has begun to implement in accordance with the validated PD.

4.6.10 Net Offsite Biodiversity Benefits (B3.3)

The Project's Monitoring Report states that no explicit evaluation of the area outside the Project is available, however, given the rapid expansion of areas used by the trigger species, it is likely that biodiversity increased outside the project area as well. The verification team agrees that this is a reasonable assumption given that wildlife ranges extend beyond the project area.

Based on observations and interviews during the site visit and reviews of project documents and NRT publications, the verification team concludes that the net offsite biodiversity impacts of the Project so far have been positive. However, it is still early in the life of the Project and the longer lasting impacts are likely to be realized later in the life of the Project.

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

The Project monitors biodiversity impact by assessing key wildlife species across the conservancies and by conducting surveys of key indicator species. These monitoring procedures and results of recent surveys are discussed in detail in the validated PD and the Monitoring Report.

The verification team interviewed NRT's Senior Research and Monitoring Officer during the site visit who described monitoring efforts in the project conservancies in detail. His descriptions of monitoring were consistent with the validated PD except as noted in the change to the PD identified in the monitoring plan which reflects revised monitoring timelines. NRT also maintains a Wildlife CoMMS Manual for monitoring wildlife and illegal activities.

Project-wide wildlife assessment, as described in the validated PD, is conducted through daily observations of wildlife by game scouts with observations recorded in NRT's ranger-based monitoring program, Wildlife CoMMS. Wildlife CoMMS is a ranger-based monitoring system designed to monitor wildlife and illegal activities. Monitoring provides information on trends in wildlife species and threats such as poaching, human-wildlife conflict, and environmental degradation. Conservancy rangers conduct daily patrols to collect data including numbers and

locations of species, information on wildlife carcasses, details on wildlife conflict, and information about illegal incidents. Wildlife CoMMS are also discussed in sections 4.6.1 and 4.6.13 of this verification report.

The verification team reviewed the results of monitoring via Wildlife CoMMS as documented in NRT's Status of Wildlife Report 2005-2019: most project conservancies saw increases in populations or stable populations since the start of the Project. Because the Project is validated to the Gold Level for exceptional biodiversity benefits, the verification team also verified that the results of monitoring include population trends of each trigger species—including elephant, gerenuk, black rhino, Grevy's Zebra, beisa oryx, and reticulated giraffe. Wildlife CoMMS provides information on trends in trigger species and threats including human-wildlife conflict, poaching, and environmental destruction. Detailed results are shown in the table in section 4.6.13 of this verification report. The Monitoring Report also includes heat maps for these and other species during the baseline and project scenarios. The verification team also reviewed samples of conservancy annual wildlife reports which include data on wildlife observations, patrol effort, illegal incidents, wildlife conflict, and wildlife mortalities which are collected via Wildlife CoMMS. The project proponent also provided the raw data set from the Wildlife CoMMS database, which includes data from all years in this monitoring period, to the verification team. This evidence and these document reviews demonstrated that the project-wide wildlife assessments and biodiversity monitoring was carried out as described in the validated PD.

Surveys of key indicator species, as described in the validated PD, are conducted every three years in five biodiversity monitoring platforms. The Project conducted baseline surveys in 2014 and did not conduct project surveys until 2021 (which were not reviewed as the surveys were conducted outside of this monitoring period). The Project Proponent listed the gap in surveying as a change to the PD in the Monitoring Report and justified the change because the Project did not generate VERs from 2013-2016 and thus did not have revenue to pay for the biodiversity sampling in 2017.

The verification team concludes that biodiversity monitoring was carried out in accordance with the validated PD except as noted in change to the PD listed in the Monitoring Report.

4.6.12 Biodiversity Monitoring Plan Dissemination (B4.3)

The Project intends to disseminate results of biodiversity monitoring at annual conservancy-wide meetings. The verification team reviewed evidence that results of wildlife monitoring was communicated at the Kalama Conservancy AGM in 2019 via the Girgir Group Ranch progress report issued to members/stakeholders two weeks prior to the AGM to provide information and facilitate positive and constructive contributions during the meeting. The verification team also reviewed other means of communicating results including NRTs Annual Reports published on its website which include key species population trends based on results of Wildlife CoMMS and NRT's Status of Wildlife Report 2005-2019 on its website which also includes data gathered using Wildlife CoMMS.

The verification team concludes that biodiversity monitoring was carried out in accordance with the validated PD.

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

The project activities include actions to maintain and enhance the population status of trigger species in the project area. There are six trigger species identified in the validated PD: Black rhino, beisa oryx, reticulated giraffe, African elephant, gerenuk, and carnivores (lion, cheetah, and wild dog). As described above in section 4.6.1 of this verification report, the Project did not conduct surveys of key indicator species in accordance with its monitoring plan during this monitoring period. As a result of this deviation from the monitoring plan, the data set to demonstrate the Project's impacts on trigger species—according to the monitoring plan in the validated PD—was incomplete for this monitoring period. Thus, the verification team did not visit monitoring points during the site visit. However, based on interviews with NRT and other project stakeholders during the site visit and document reviews, the verification team confirmed that the Project is already demonstrating success in maintaining and/or enhancing the population status of trigger species, as discussed above in section 4.6.3 of this report.

The verification team reviewed the results of monitoring conducted via Wildlife CoMMS, as documented in NRT's Status of Wildlife Report 2005-2019: most monitoring areas within project conservancies saw increases in populations or stable populations of trigger species. Wildlife CoMMS is a system for monitoring trends in wildlife and their threats. Conservancy personnel are responsible for the collection, analysis, and interpretation of data in order to make informed management decisions for the respective conservancy. Conservancy rangers collect data during their daily patrols. The Monitoring Report also includes heat maps for trigger species during the baseline and project scenarios.

Table 6 below summarizes the verification team's review of project actions to maintain or enhance the population status of each trigger species in the project zone and reduce threats to them. The Project's shift in livestock management from continuous grazing to planned rotational or migratory grazing allows rest for forage, allowing for recovery and seed production after grazing and during periods of rainfall. It also increases plant production--and decreases bare ground--and allows shifts from annual vegetation and forb-dominant vegetation to perennial grasses. This provides greater forage support for wildlife populations. Another project activity to maintain and enhance populations of trigger species are increased patrols and protection provided by patrols of conservancies by game scouts. Based on the verification team's reviews, the Project has maintained and/or enhanced the populations of all trigger species in the project area.

Table 6. Trigger Species Population Trends Assessment

Trigger Species	Summary of Review	Conclusion
African elephant	Results of monitoring documented in the Status of Wildlife Report 2005-2019 indicate increases in populations or stable populations from baseline years (ranging from 2007 to 2014) to 2019 in 93% of monitored project areas. 1 monitored project area (7%) shows a decrease from 2007 to 2019.	Based on the results of Wildlife CoMMS—increases in population growth compared to the project baseline—implementation of project activities maintains and enhances the population status of African elephant.
Beisa oryx	Results of monitoring documented in the Status of Wildlife Report 2005-2019 indicate	Based on the results of Wildlife CoMMS—increases in population growth compared to

	increases in populations or stable populations from baseline years (ranging from 2008 to 2014) to 2019 in 67% of monitored project areas. 7% of project areas show a decrease from 2007 to 2019. In 4 monitored project areas (27%), oryx are not sighted frequently enough to allow trend analysis.	the project baseline—implementation of project activities maintains and enhances the population status of beisa oryx.
Black rhino	As documented in the Status of Wildlife Report 2005-2019, the Sera Rhino Sanctuary (within the project area in Sera Conservancy) has seen average population growth of approximately 14% per year since it was established in 2015. At the project start date, there were no black rhino in the project area.	Based on the results of Wildlife CoMMS—increases in population growth compared to the project baseline—implementation of project activities maintains and enhances the population status of black rhino. The Sera Rhino Sanctuary is unique compared to other project areas as the Kenya Wildlife Service established the sanctuary; however, the sanctuary is part of the project area, as livestock grazing is allowed there, and conservancies and game scouts protect against poaching, which is the major threat to rhinos.
Gerenuk	Results of monitoring documented in the Status of Wildlife Report 2005-2019 indicate increases in populations or stable populations from baseline years (ranging from 2008 to 2014) to 2019 in 67% of monitored project areas. 27% of project areas show a decrease from 2007 to 2019 and 1 project area (7%) does not have frequent enough sightings of gerenuk to allow trend analysis.	Based on the results of Wildlife CoMMS—increases in population growth compared to the project baseline—implementation of project activities maintains and enhances the population status of gerenuk.
Reticulated giraffe	Results of monitoring documented in the Status of Wildlife Report 2005-2019 indicate increases in populations or stable populations from baseline years (ranging from 2007 to 2014) to 2019 in 93% of monitored project areas. One monitored project area (7%) shows a decrease from 2009 to 2019.	Based on the results of Wildlife CoMMS—increases in population growth compared to the project baseline—implementation of project activities maintains and enhances the population status of reticulated giraffe.
Carnivores: lion, cheetah, and wild dog	Lion - Results of monitoring documented in the Status of Wildlife Report 2005-2019 indicate increases in populations or stable populations from baseline years (ranging from 2007 to 2014) to 2019 in 80% of monitored project areas. 3 monitored project areas (20%) show a decrease from 2012 to 2019.	Based on the results of Wildlife CoMMS—increases in population growth compared to the project baseline—implementation of project activities maintains and enhances the population status of lion.
	Cheetah - Results of monitoring documented in the Status of Wildlife Report 2005-2019 indicate increases in populations or stable populations from baseline years	Based on the results of Wildlife CoMMS—increases in population growth compared to the project baseline—implementation of

	(ranging from 2007 to 2014) to 2019 in 67% of monitored project areas. 4 monitored project areas (27%) show a decrease from 2008 to 2019 and 1 project area (7%) does not have frequent enough sightings of cheetah to allow trend analysis.	project activities maintains and enhances the population status of cheetah.
	Wild dog - Results of monitoring documented in the Status of Wildlife Report 2005-2019 indicate increases in populations or stable populations from baseline years (ranging from 2007 to 2014) to 2019 in 67% of monitored project areas. 4 monitored project areas (27%) show a decrease from 2007 to 2019 and 1 project area (7%) does not have frequent enough sightings of cheetah to allow trend analysis.	Based on the results of Wildlife CoMMS—increases in population growth compared to the project baseline—implementation of project activities maintains and enhances the population status of wild dog.

Based on reviews of published data, the verification team concluded that the project actions to maintain and/or enhance the population status of each trigger species are already realizing success. However, it is still early in the life of the Project and the longer lasting impacts are likely to be realized later in the life of the Project.

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

Project indicators of the population trends of trigger species are presence of species within the area, documented through Wildlife CoMMS, as discussed in more detail above in sections 4.6.1, 4.6.11, and 4.6.13. For elephants specifically, the numbers of poached elephant carcasses also serve as an indicator. The Project did not identify any threats to indicators of population trends in the validated PD and thus the verification team did not assess or make conclusions about the effectiveness of threat reduction actions taken by the Project.

As noted above, the verification team concluded that the project actions to maintain and/or enhance the population status of each trigger species are already realizing success. However, it is still early in the life of the Project and the longer lasting impacts are likely to be realized later in the life of the Project.

4.7 Additional Project Implementation Information

Not applicable.

4.8 Additional Project Impact Information

Please see Appendix C regarding public comments received during the CCB public comment period.

5. VERIFICATION CONCLUSION

RCE performed the verification of the project Northern Kenya Grassland Carbon Project. The verification was performed according to the VCS Agriculture, Forestry and Other Land Use (AFOLU) Requirements, v3.6 and VCS Standard, Version 4.1.

RCE confirms that the Project complies with the verification criteria in CCB Version 3 and VCS Version 4 in addition to the Methodology and applicable tools with no qualifications or limitations. It also confirms that the Project has been implemented in accordance with its validated PD. The non-permanence risk rating for the project is 15%.

Public Comments received during the CCB Verification Public Comment Period were addressed by the project proponent. RCE reviewed the public comments and responses following the requirements of the Climate, Community & Biodiversity standards, version 3. RCE confirms that the responses provided by the project proponent accurately address the public comments received during the CCB Verification Public Comment Period.

RCE concludes that the benefits reported by the Project for the climate, community and biodiversity are real and verifiable, and that the Project is on track to achieve its long-term objectives.

All CARs, ADRs, and CRs raised by RCE have been satisfactorily resolved by Native and the Project Proponents. The emission reductions from the Project Activity for the current reporting period are 4,179,523 tonnes of CO₂e.

RCE conducted a risk-based analysis of the Northern Kenya Grassland Carbon Project including a strategic review of the Project data, documentation, and emission reduction calculations. RCE concludes to a reasonable level of assurance that the GHG assertion is free of material misstatement. The emission reductions for the reporting period 1 January 2017 – 31 December 2020 can be considered in conformance with the following criteria:

- VCS Standard version 4.1 (22 April 2021).
- VCS Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing version 1.0 (VM0032)
- Climate, Community and Biodiversity standard version 3
- Validated VCS Project Description version 6 dated 28 April 2020.
- ISO 14064-3:2006 “Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions”

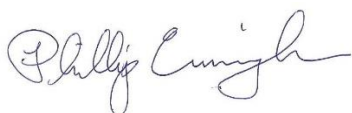
Verification period: From 1 January 2017 – 31 December 2020. Verified GHG emission reductions and removals in the above verification period are presented below.

Table 7. Verified GHG emission reductions and removals in the 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 (tCO ₂ e)	Non-permanence buffer credits
2017	140,973	1,764,519	352,183	1,413,336	212,000
2018	140,973	1,308,601	85,019	1,223,582	183,537
2019	140,973	146,718	36,593	110,125	16,519
2020	140,973	1,788,063	355,583	1,432,480	214,872
Total	563,892	5,008,902	829,378	4,179,523	626,928

Independent Reviewer Signature

Lead Verifier Signature



Phillip Cunningham
Environmental Scientist



Zach Eyler
Vice President

Appendix A: Reviewed Documents

#	Document	Description
1	PD and validation report folder	Contains the PD and validation report of the project
2	GIS files	Kml files of the project area
3	NRT files	Contains folders with the evidence of the implementation of the projects activities, such as photo galleries, dissemination reports and signed agreements. Includes annual reports, conflict reports, county grazing plan meetings, minutes from meetings, Social CoMMs, stakeholder engagement, training reports and wildlife reports.
4	Grazing reports	Provides evidence of project activities and assessment of leakage emissions
5	NRT files	Photo evidence of the dissemination of the monitoring results
6	GHG emission reduction workbook	Calculation of baseline, project and leakage emissions
7	NDVI Data	Provides results of successful grazing implementation throughout the project area
8	Ownership files	Provides evidence of community rights to land
9	Monitoring Report	Required for verification of emission reductions
10	CCB Public Comment period comments from survival international and Project Proponent's response to comments	Review of public comments and responses from project proponent

Appendix B: List of findings

Corrective Action Requests:

Action Item	Resolution
22 Jul 2022: Revise the Monitoring Report. a. To include references to meetings, monitoring, etc. that took place during the monitoring period (2017-2020). There seem to be a lot of references that were not updated since the Monitoring Report for the last monitoring period. In some cases, referencing earlier events may be relevant. Specific examples include: Section 2.3 Stakeholder Engagement, Section 2.5.4 Identification of Illegal Activity (if any activity during the monitoring period), Section 4.2.2 Net Impacts on Other Stakeholders, Section 4.3.1 Community Monitoring Plan & 4.3.2 Monitoring Plan Dissemination (no surveys during the 2017-2020 monitoring period are mentioned), and Section 4.4.2 Marginalized and/or Vulnerable Community Groups b. To include a Project Description deviation and justification for biodiversity monitoring: the PD states "Surveys of key indicator species. Sampling in savanna/grassland habitats will take place every 3 years in five permanent biodiversity monitoring platforms, or 'camps.'" According to the narrative in the Monitoring Report, baseline surveys were conducted in 2014 and the first project surveys were conducted in 2021. c. Section 4.1.4 Protection of High Conservation Values (CM2.4) does not address high conservation values related to community well-being (the explanation in this section seems to be relevant to HCVs related to biodiversity, i.e. protected areas, threatened species, etc. which should be discussed in section 5.1.4) d. Section 2.1.8 Title and Reference of Methodology – the instructions state "Include also the title and version number of any tools applied by the project." Please update to include relevant tools. e. Section 2.2.4 Project Description Deviations – the instructions state "Identify whether the deviation impacts the applicability of the methodology, additionality or the appropriateness of the baseline scenario and provide an explanation of the outcome." Please identify which area the deviation impacts and what the outcome is. f. Section 3.1.1 Data and Parameters Available at Validation – for GWPCH4, you list for "purpose of data", "Calculation of project soil carbon removals". However, GWPCH4 doesn't apply to soil carbon. g. Regarding Section 3.1.3 Monitoring Plan, the fourth bullet point states "The implementation of sampling approaches, including target precision levels, sample sizes, sample site locations, stratification, frequency of measurement and QA/QC procedures. Where applicable, demonstrate whether the required confidence level or precision has been met." I didn't see this addressed similar to the other three bullet points. h. Table 11. Has not been updated based on the most recent assertion spreadsheet.	19 Aug 2022: Native provided an updated Monitoring Report. • Section 2.3 Stakeholder Engagement- Added updates to MR; waiting on additional documentation from project partner (Soils for the Future) and will send as soon as it comes in. • Section 2.5.4 Identification of Illegal Activity (if any activity during the monitoring period) - Added updates to MR • Section 4.2.2 Net Impacts on Other Stakeholders- Added updates to MR • Section 4.3.1 Community Monitoring Plan & 4.3.2 Monitoring Plan Dissemination- Added updates to MR • Section 4.4.2 Marginalized and/or Vulnerable Community Groups- Added updates to MR • Section 2.1.8 Added updates to the MR • Section 2.2.4 Addressed for deviations 7 & 8 (regarding NDVI updates) in the MR • Section 3.1.1 Added updates to MR • Tables 9 and 11 are now updated in the MR
Naapu-Nanapisho (Oldonyiro), Naibunga, Nakuprat, Namunyak and Nasuulu acres listed in the 'Monitored Removals by Strata' tab in the assertion spreadsheet are different than the polygon areas in Google Earth. The overall acreage appears to match though. This causes a material error in the verifier's re-calculations	It looks like this is an error not in the values, but how the values were matched with each conservancy. The total is the same but the values were mismatched across those conservancies. An example is Nasuulu shows 34,601 in a polygon but shows 288,232 in that monitored table tab. 288,232 is Namunyak's total acreage. I've updated the table to reflect these changes and match up with the polygon area. With these changes, I'm calculating a total of 4,179,523 pre-VCS buffer.

The instructions under 'Overall risk rating (a + b + c) states that, "Note: Overall risk rating shall be rounded up to the nearest whole percentage". However, the assertion spreadsheet multiplies net emissions and removals by 14.5% which is not rounded.	The overall risk rating was updated to 15%.
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Non-material Finding:

Action Item	Resolution
In the 'Leakage and Encroachment.xlsx' file on the 'Livestock Estimates' tab, the formula for households in Namunyak does not match the formula from the Namunyak graph in the 'For Verification_NKCP Methane Calculations 2017-2020 v1 Sept...' file on the 'Households Since 2009' tab.	In the 'Households Since 2009' tab there are two population surveys. One is from 2009 and the other from 2014 (baseline). Since then, the 'LVEst' tab is the more updated population figures for Namunyak and all project conservancies. These totals in the LVEst tab align with the totals in the 'Livestock Estimates' tab found in the 'Leakage and Encroachment.xlsx' file. The graphs found in the 'Households Since 2009' tab are generated from the 2009 census and early membership counts.

Additional Documentation Requests:

Action Item	Resolution
The previous validation/verification body issued the following forward action request: "A FAR is 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.' Future auditors are recommended to examine whether the project continues to meet this applicability condition. Please provide documentation or clarify how Native is addressing this situation.	A narrative description addressing the question of enforceable project boundaries is included in Section 6 of the 2017-2020 Monitoring Report (Additional Project Implementation Information). Further, the presence of animal incursions is noted in the leakage and encroachment calculation files. These totals are discounted from the emission reduction estimates to provide an accurate representation of project activity and VER totals.
The previous validation/verification body issued the following forward action request: "A CCB forward action request is issued 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 is being issued to follow up on the conflicts, particularly those that exist over dispute of land ownership and usage rights." Please provide documentation or clarify how Native is addressing this situation.	5.18.22: Conflict related to grazing is addressed through regional grazing meetings and inter-conservancy grazing meetings. Reports from these meetings were previously shared with Ruby Canyon Environmental's Nina Pinette and are now uploaded to the shared OneDrive folder as well. As an additional note, grazing reports were developed for each conservancy to incorporate borders and increase transparency on livestock movement and potential encroachment. These grazing reports were also previously uploaded to the shared OneDrive folder.
22 Jul 2022: If available, provide an analysis/summary of the results of the Social CoMMs from the baseline monitoring vs project monitoring. Excerpts of the results of comparisons are shown in the Monitoring Report (e.g. Table 12, Figures 15 & 16) but is there a more comprehensive data set showing comparisons? The file Social CoMMs summary table.xlsx was provided but it only shows results from 2019-2021.	5 Aug 2022: Note 2014 and 2015 data (shared via OneDrive) were combined to create the baseline. 2020 data is considered to be the "project scenario." These timelines follow the CCB guidelines for "community" monitoring. In regards to a summary comparing baseline with project scenario, the excerpts from pg. 81-85 in the "NKCP VCS CCB Monitoring Report_2017-2020_v1.5," capture the changes from baseline to project. We do not have an overall comparison document that combines the 2014/2015 data and the 2020 data. Priscilla is working to generate comparisons for the conservancies of Melako and Westgate.
22 Jul 2022: Provide the Regional Grazing Plan(s) referenced in the PD and the Monitoring Report (which contain annual plans to manage grazing across all conservancies).	5 Aug 2022: The regional grazing plans are by county and not for the entire project area. County meetings, which I've added to the shared OneDrive folder as "County Grazing Plan Meetings," are held annually where the conservancies within the county discuss and plan for any grazing changes in the near future. These regional meetings and minutes have been shared with you as "regional meetings." The grazing plans for each conservancy (which are in the shared OneDrive folder under "Grazing Blocks and Plans") are the products of these regional meetings. As noted in the MR- "the formation of a regional grazing plan also facilitated discussions of County-wide grazing plans in October of 2015, which delivered information to and coordinated activities."
22 Jul 2022: Provide evidence that the Conservancy-wide project meeting occurring annually in Sept or Oct (referenced in the MR Section 4.3.2) took place during the monitoring period and that results of monitoring (community, biodiversity, etc. from SocialCoMMs surveys) are shared. The meeting minutes provided do not specifically reference the results of monitoring.	5 Aug 2022: Feedback sessions for VegComms and WildlifeComms happen yearly in the conservancy but these are done separately in focused meetings as opposed to AGMs or quarterly meetings. Conservancies are sent their SocialComms results yearly and they can share with their boards and conservancy members in their meetings. These results are also included in the NRT annual status of conservancy

	reports and these are shared with conservancies also. Kindly refer to the wildlife feedback reports and the state of conservancy report that are shared.
Regarding the risk report calculation; provide some form of evidence regarding answers in the 'Financial Viability' section.	Attached is the confidential-view NPV file. As documented in the N-P report, "Project has available as callable financial resources at least 50% of total cash out before project reaches breakeven- Our partner Native has provided funding for all required cash out for validation and verification of the initial tranche, thereafter, ample credits will be available and the project breaks even.

Clarification Requests:

Action Item	Resolution
1. Regarding the spreadsheet 'For Verification_ NKCP Methane Calculations 2017-2020 v1 Sept 2021'; what is the difference between the 'Households Over Time' tab and the 'Households Since 2009' tab? Which values are used to estimate total livestock population? 2. Regarding the calculation of people from the 'Households Since 2009' tab; the values for people are hard-entered. Is there a formula that calculates the populations for 2017 - 2020? Where do these values originate from? 3. On the 'NRT Methane Baseline' tab column L, the 'Annual Methane Emissions/Animal,tCO2e' formula includes the weight of each livestock category to the power of 0.97. Why is this applied? The VM0042 Section 8.1.3.1 Baseline Emissions from Grazing Animals (BEM) does not reference this operation and RCE did not see this value in the validated Project Description.	1. The values located in 'Households Over Time' are through 2014 and include an estimate for 2020. The 'Households Since 2009' tab includes the monitoring period years of 2017-2020 due to the equations from regressions based on 2009 census and population size reports from each Conservancy in 2018 and 2020. 2. The formula that calculates 2017-2020 is based on an estimated 5.59 people per household from baseline household surveys conducted in 2014. The number of people, NP, for each Conservancy at the end of the monitoring period, 2020 were obtained from numbers reported by each Conservancy on the NRT interactive map. The number of households NHH in the project area was calculated as follows: $NHH = NP / MHHN$ Where mean household size "MHHN" was found to be 5.59 (+ 0.09 SE, uncertainty 0.06) in household surveys conducted in 1030 households in four different Conservancies in 2014. 3. The 'Annual Methane Emissions/Animal, tCO2e' formula includes the weight of each livestock category to the power of 0.97. This value of 0.97 is sourced from functions found in Table 4 of VM0032 (see pg. 24). Table 4: Allometric Equations, with Uncertainty, for Daily Methane Emissions for Animal Types: Ruminants: $0.66 \times Wc^{0.97}$
1. Regarding the spreadsheet 'For Verification_ NKCP Methane Calculations 2017-2020 v1 Sept 2021' on the 'Lvest' tab; Namunyak's population is listed as 32,504. Where did this data come from? On the website "www.nrt-kenya.org/interactive-map", Namunyak Wildlife Conservancy is located within Nalowuon whose population is only listed as 14,957. 2. On the 'Lvest' tab, Biliqo Bulesa's population is listed as 5,300 but the website lists 5,833. 3. Same tab; Naapu-Nanapisho is listed as 6,833 but the website lists 6,783. 4. Same tab; Naibunga is listed as 19,606 but the website lists 19,106.	1. Namunyak (Wildlife Conservancy) is composed of three units as described on the NRT interactive map: Kalepo (8,142), Ngilai (9,405) and Nalowuon (14,957). Together, you will find these total 32,504. 2-4. You are correct in noting the difference in population totals for Biliqo Bulesa, Naapu-Nanapisho and Naibunga between those listed for the monitoring period and those on the NRT interactive map. These are confirmed to be typos in transcribing the numbers from the NRT interactive map. These population totals in question can be adjusted across all relevant files according to the totals on the NRT interactive map.
Regarding the spreadsheet 'For Verification_ NKCP Methane Calculations 2017-2020 v1 Sept 2021' on the 'LVCensus' tab; the ratio of donkeys to cattle is set to 0.75. Please clarify why the method for estimating this category is different in the project than the baseline.	The mean number of livestock of different classes "c" (cattle, shoats, donkeys, camels) per household was determined from a survey of 1030 households conducted in 2014. These means were assumed to be similar to 2014 in 2017-2020. This method was used because many Conservancies were highly inconsistent in reporting actual livestock numbers, even in months where all livestock were reported to be present on the Conservancy, or simply did not report actual livestock numbers. In tab 'LVEst,' Animals per Household from 'NRT HH Survey 2014 v 1.1 July 15 2019.xls' Tab "Baseline Means," the values are Cattle: 5.537864078 Donkeys: 0.784466019 From the NRT Household survey conducted in 2014, this ratio was trued-up and used for both baseline and projected (2004-2020) for donkeys (adult + juveniles/household). The ratio of donkeys (adults + juveniles) to cattle (adults + juveniles) is 0.141654959 as seen in tab 'LVCensus' cell X23. This ratio is then used against the cattle total (adults/household + juveniles/household) and multiplied by the ratio value of 0.141654959.
Regarding the threshold of change in NDVI for assessing successful/unsuccessful grazing, please provide more data about the calibration of binary logistic models, output parameters and an	See page 7. Figure 1.a. (livestock presence model) shows that monthly relative NDVI (NDVI _{rel}) could be used to predict known locations (random points) of livestock presence and absence. Livestock being present means they could be grazing successfully or unsuccessfully (i.e., overgrazing) or anywhere along that

explanation about why you propose to better use the threshold from a model with square R of 0.48 instead of a model with square R of 0.74	spectrum (it just means "livestock are there"). The critical point is that change in NDVI wasn't sensitive to livestock until reaching the threshold of 0.1 or greater. This is demonstrated visually by the tightly bound points on the upper horizontal axis in Fig A. I would note that the R2 value of 0.48 indicates that a significant proportion of variance is explained by the model and this relationship was highly significant at $P < 0.0001$. Figure 1.b. (grazing success model) shows that NDVI could be used to predict a single known grazing event (per grazing records). Single means successful in this context. Change in NDVI was shown to be predictive of success at a threshold of 0.8 or less (and unsuccessful at greater than 0.8). However, there's a large spread in confidence around that threshold, which is visually indicated by the spread-out points on the lower horizontal axis (unsuccessful grazing). Logically, it holds that livestock must actually be present to know if those livestock are successfully grazing or not, hence the use of the threshold from the livestock presence model (Figure 1.a.), which is proposed for 2017-2020 verification, instead of the threshold from the grazing success model (Figure 1.b), which was used in 2013-2016 verification. To reiterate, these figures are both derived from the pre-study (circa 2014). Calibration data from the pre study can't be located as it was done 9 years ago.
On page 2 of 'assessment & justification NDVI...' you report two regression lines; before and after grazing. One is $R^2=0.6$ and the other is $R^2=0.556$. Which threshold represents most accurately the polygons of successful grazing reported by the community (collected on the field)?	The regressions on page 2 are related and are part of the "pre-study" (circa 2014) to calibrate clipped biomass (from field quadrats) with NDVI (satellite remote sensing) in areas of known livestock presence and absence. Both regressions are unrelated to the grazing reports from the current monitoring period (2017-2020). They simply indicate and justify the use of NDVI for detecting grazing pressure. (Everything under the heading "Assessment of successful pastoralist grazing plans - Full methodological details" is related to the pre-study to justify the NDVI method.) Please remember that the critical point for this justification is that livestock must actually be present to know if those livestock are successfully grazing or not.
22 Jul 2022: Have there been any changes to the following since validation: a. Recognition of property rights and ownership & Property right protection: Conservancies are either made up of group ranches or are on Trust lands b. Free, Prior and Informed Consent: project participation is voluntary, there are no issues with encroachment onto private lands (into non-participating communities) or encroachment into project area by non-participating communities c. Identification of illegal activity including whether there has been any significant illegal activities during the monitoring period and whether there have been any peace meetings or other conflict resolution events during the monitoring period? (the MR references July of 2015).	5 Aug 2022: a. No changes for 2017-2020. The following conservancy have transited to Community Lands in 2021 and 2022 (will add to 2021 MR): • Samburu conservancies (Kalama, Sera, Meibae, Westgate, Nalowon, Ngilai and Kalepo) • Laikipia(Naibunga Lower, Naibunga Upper, Naibunga Central, Ilngwesi and Lekurruki) b. No changes. c. All illegal activities are monitored and documented in "conflict incident reports" attached (2017-2021) in this email. There has been no significant activity of illegal activities during the monitoring period (2017-2020 & 2021).
In the file 'NKCP VCalcs 2017-2020 v3 Apr 2022.xlsb', on the 'Net Emissions and Removals' tab, I'm confused about how you calculated Total Annual Project Uncertainty; specifically, I don't understand column Q 'Weighted Uncertainty'.	Total uncertainty can be calculated by weighting uncertainties according to the magnitude of emission or removal. In this case, uncertainty in net reductions and removals UNRt is driven by uncertainty in baseline emissions, project emissions and project net changes in carbon stocks. See pg. 102 within section 3.2.2 in the PDD for additional context and formulas used.
Please clarify the following values from the risk report calculation: 1. Regarding section 2 External Risk, you answered 0 to g) "Mitigation: Where disputes over land tenure, ownership or access/use rights exist, documented evidence is provided that projects have implemented activities to resolve the disputes or clarify overlapping claims". Could you explain why you answered 0 to this question? 2. Under 2 External Risk question "What is the country's calculated Governance score?", could you clarify where the governance score of -0.5 comes from? 3. under f: Mitigation: Country implementing REDD+ Readiness or other activities such as: "...", why did you answer -2? 4. Can you explain the reasoning behind values selected under '3 Natural Risk' (or point me to where this is explained in the PD).	1. This is not applicable to the project and the conservancies. While there are local disputes over access to patches of forage or water, or over livestock theft, these are temporary and do not involve chronic disputes over land ownership or the right to conservation revenue. 2. According to Verra's documentation for calculating Governance score (section 2.3.3- 1.)), this website is to be used as it states "A governance score (of between -2.5 and 2.5) shall be calculated from the mean of Governance Scores across the six indicators of the World Bank Institute's Worldwide Governance Indicators (WGI)1, averaged over the most recent five years (used 2016-2020 for five years) of available data." Breakdown of scores is outlined in the attached N-P risk document. 3. This is because the country of Kenya falls into this category and that is the assessment for this metric. This is explained in the attached N-P risk document as "Kenya has 16 CDM Afforestation/Reforestation Projects and a Designated National Authority."

	4. I have attached the formal N-P risk document that includes reasoning behind each value identified in the Natural Risk section.
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Appendix C: Response to Public Comments Submitted for the Project

Comments of Survival International	Responsive comments of Native	Responsive comments of Ruby Canyon Environmental
1. Additionality The project does not present a credible case for its additionality. It is based on a presumption that the traditional forms of grazing were causing degradation of soils and that only the carbon project could remedy this. But the case that the area was being degraded through 'unplanned grazing' is not supported with any empirical evidence, and indeed the project ignores that the 'unplanned grazing' is in fact subject to traditional forms of governance which have sustained pastoralism within broadly sustainable limits for many centuries. Rather than showing that the project was additional because there was no other way of financing the intended changes to grazing regimes, it chose to show that its additionality lay in the fact that there were many barriers to achieving what was wanted by the project, and that it was least like what had happened in the past. This method of demonstrating additionality has the highly perverse effect of incentivizing an approach (centralized, rigidly planned grazing within prescribed geographical areas) that is in fact strongly both contrary to the cultural norms of the areas' indigenous pastoralists, and also potentially highly dangerous to people and the environment. There is no empirical evidence drawn from direct assessment or data that the project's purported 'planned rotational grazing' is either a/ actually occurring across most of the project area or b/ actually any better for soil carbon accumulation than the traditional pattern of pastoralist land management. On the other hand, there is evidence that prevalent traditional grazing is not strongly correlated with either vegetational changes or the associated levels or soil carbon.	The project presents a strong, credible case for additionality. Historically (prior to 1970), nomadic grazing, moving herds across large areas allowed sufficient rest and regeneration of perennial grasses, as the perennial grasses co evolved with migratory animals. Over the half century prior to the project period, pastoralists in the project area became increasingly sedentary and livestock movements within the wet season decreased both in frequency and distance covered. This meant that pre-project practices were not as mobile as traditional practices where herders would typically move their entire family across the landscape to and from a series of temporary bomas. Households became much more permanent, and as population size increased, continuous unplanned grazing could no longer be supported by the landscape, especially as degradation increased. For evidence of degradation, reference Figure 9 on page 64 of PD and Figure 11 on page 65 of NKCP VCS CCB PD v6.0. The project works with communities to present the benefits of coordinated, rotational grazing as a way to improve pasture and describe the process of earning carbon revenue from improved grassland management. Revenue from carbon provides an important additional incentive for herders to follow conservancy grazing plans, through investment of carbon revenue into community development 1Pas, A. (2018, March 31). Governing grazing and mobility in the Samburu Lowlands, Kenya. MDPI. https://www.mdpi.com/2073-445X/7/2/41 evidence that prevalent traditional grazing is not strongly correlated with either vegetational changes or the associated levels or soil carbon.	Additionality is assessed as part of the initial validation. RCE was not the initial validator; however, RCE reviewed the validation report and conclusions and agrees that the project has met all Verra Standard requirements and all protocol requirements for this project type. The statement that the project does not present a credible case for additionality is unfounded.
2. Baselines As above, the baseline is merely drawn from a presumption that the traditional forms of grazing is causing degradation of soils, and would continue to do so, without this being based on any empirical evidence. The limited information provided by the project purporting to show a decline in vegetation quality prior to the project does not in fact show this at all (see the validated Project Document, p64). Evidence presented by NRT indicates that, if anything, the quality of vegetation has declined since the project started.	Grazing practices implemented between ~1970 and 2012, which cannot be accurately characterized as traditional, were accompanied by (as demonstrated in Fig. 11 and Fig. 9 in the PD) a significant negative trend in NDVI prior to the project start date, so we are unsure where this claim is sourced from. Fig. 3A and Table 12 of the "Data Analysis in Support of Verification of Carbon Credits for the Northern Kenya Grasslands Carbon Project" show increasing NDVI over the period 2015 - 2020, after controlling for the effects of variation in precipitation. This shows that the NDVI increases occurred independently of any influence of annual variation in precipitation. The commenters' conclusion is based on a qualitative table (12) of change sourced from a limited sample of	Baseline is assessed as part of the initial validation. RCE was not the initial validator; however, RCE reviewed the validation report and conclusions and agrees that the project has met all Verra Standard requirements and all protocol requirements for this project type. The statement that the project does not present a credible baseline is unfounded.

	vegetation monitoring plots that compared wet years (early in the project lifetime) and the most recent sample in a drought year (2020). The aforementioned table (12) shows only that Settlement areas, where grazing management is not occurring, have experienced continued degradation, and that some conservancies with previously well-managed Core Areas (less than 3% of the project area) showed declines due to the fact that these areas were no longer managed as Core Areas beginning in the drought of 2017. However, the project's assessment of changes in forage biomass shows that the project has improved the ability of communities to adapt to climate change and associated potential droughts, as evidenced by nearly doubling standing forage biomass during the 2015-2020 period when the project activities were fully implemented across all 13 conservancies.	
3. Leakage It is clear that there are major issues with 'leakage' from the project, particularly in the form of livestock moving off-project. The project purports to be able to quantify how many 'livestock days' are spent off project, but analysis of the monitoring data on which these claims are based – especially the monthly grazing reports – show that these are for the most part wholly inadequate for such a purpose. Many are entirely lacking in credible information about where livestock are at any given point in time, with little or no information about where exactly large number of livestock have moved to. The quantification of leakage is in fact little more than guesswork. Related to this issue, it is clear from both the livestock reports and other project documentation, that the project has no meaningful control over its boundaries, which is in fundamental non-compliance with the methodology (VM00032) under which the project was developed. The validation and previous verification scrutinized this issue but wrongly accepted the project's reassurances that it has mechanisms to detect and monitor movements of livestock off-project. In reality there is no such mechanism; the 1,000-kilometre project boundary is highly porous, and almost impossible to monitor in any meaningful way. The containment of livestock within proscribed boundaries is, as the project itself admits, anyway contrary to the long-established traditional grazing patterns which can include short- and long-term, long-distance migrations. These can be essential for survival of both livestock and people, especially during times of drought.	It is correct that the project does not "control boundaries" in the conventional sense (such as by fencing, etc.) The previous issues with monitoring control over the project area in the first verification period (2013-2016) were subject to a VVB issued and subsequently resolved Forward Action Request to require the project to improve communication about the need to keep livestock on the project area, but with the expectation that livestock would move off the project area during severe droughts or extended dry seasons. The VVB did not judge there to be a "lack of control of boundaries" because such control was deemed impossible in open pastoral systems, such physical restriction would be counter to cultural mores, and leakage was conservatively penalized in carbon removal calculations. It is important to note the project does not turn back herders at the boundary, and to do so would significantly increase risk of conflict in the project area and in the surrounding landscape. For leakage calculations, the penalty leakage method was chosen as it conservatively assumes that livestock off the project area are causing degradation when in fact they might not be. Methane emissions of livestock are accounted for in all months regardless of livestock location. Grazing coordinators report the number of livestock of each type on conservancies each month. If livestock are off the conservancy, the report states where they have gone. If they are not located on the project area, then this counts as leakage. The number off the project area is determined by subtracting the number on the home conservancy in a given month plus the number recorded on project participating conservancies from maximum reported numbers of livestock on their home conservancy in any month. Instances where there was no knowledge of the location of livestock were always treated conservatively	This issue has already been addressed through a methodology deviation. The deviation was accepted because it relates to monitoring and metering and is conservative. RCE does not agree that the evidence provided is not credible. During interviews with on the ground personnel, RCE verifiers confirmed that personnel reporting livestock positions are knowledgeable about herd movements in the conservancies.

	and counted as instances of leakage. We agree that livestock counts in the grazing reports could be interpreted as unreliable, and we seldom use these values in leakage calculations and conservatively assume that uncounted livestock were off the project area. Grazing reports have been corroborated with measurements of grazing impacts (and thus locations of major livestock aggregations) through the use of a validated satellite based method. This analysis is reported in Fig. 7-9 in both Verification period Monitoring Reports	
4. Project monitoring Some of the issues above are related to the project's fundamental inability to monitor key aspects of the purported implementation of planned rotational grazing. The critically important periodic reports on grazing activities submitted by each of the 13 participating conservancies (which were available to the first verification period's verifiers) are generally extremely poor in quality. They lack essential or credible information about the numbers of animals present, their location, and their movements. For the period of the second verification, they are almost entirely worthless as a means of assessing even whether 'planned rotational grazing' has been implemented, let alone its outcomes. More widely, the project depends entirely on remote sensing of proxy indicators of soil carbon (i.e., an index of vegetation cover) rather than direct measurement of soil carbon, and then manipulation of that data through further algorithms/models. The steps involved in this, on the project's admission, contain very large margins of error and inaccuracy. The project's use of satellite-derived vegetation index data to indicate and detect 'successful planned rotational grazing' has been demonstrably faulty.	There are no claims of "large margins of error and inaccuracy" in any of the project documentation. Instead, the intended purpose of the Monte Carlo simulations is to account for uncertainty in model parameters and inputs, and there is a thorough and substantial review of all error calculations not only in preparation for VVB review but through VVB and Verra reviews that are associated with validation and each verification event. There is a large sampling error in measuring SOC at a given sampling station, but the 227 sampling stations allow trends to be detected and errors to be reduced despite these high local sampling errors. We acknowledge that the grazing reports were largely useful only for monitoring leakage, but there are and continue to be cases in which reporting was of sufficient quality to calibrate the satellite-based Google Earth Engine algorithm we used. It is unclear what the commenters' evidence is that the calibration of the satellite method is "demonstrably faulty." In the recent verification review for 2017-2020, it was determined that the satellite-based assessment correctly predicted where carbon accumulated and where it has not. Additionally, through the use of grazing plans and reports, individual herders, under the guidance and supervision of grazing coordinators employed by the conservancies, have been and will continue to be able to confidently move their herds among different grazing blocks within conservancies depending on the season (wet vs dry grazing blocks). This facilitates the availability of vegetation forage throughout a given year. These grazing reports also provide, for a given conservancy, valuable insight on the number of livestock present in different grazing blocks and in different areas of other participating conservancies. Coordination across a large landscape is crucial for the health of the rangeland and to reduce conflict throughout the conservancies. Impacts of livestock are monitored using a project-developed protocol that employs satellite imagery to assess how frequently, and with what intensity, livestock grazing occurs throughout the project area. As previously referenced, the project employs a Google Earth Engine algorithm that converts the satellite imagery data into an	RCE confirmed that the project proponent is following all Protocol requirements for calculating uncertainty and tracking necessary Project parameters. Remote sensing is a powerful tool that is becoming more common throughout the carbon accounting world. The total project uncertainty was calculated according to the methodology and is within specified ranges.

	assessment of whether project implementation goals were met across the entire project area. Essentially, satellite data allows project administration staff to assess whether livestock grazed an area once or not at all during a year. If livestock are determined to graze an area more than once, the satellite imagery "pixel" is classified as "not successfully implemented," and removals are not claimed from the area represented by the pixel.	
5. Permanence Even if the project were actually resulting in any real additional storage of carbon in the project area's soil – which is at best highly questionable - it is highly doubtful that it will remain there for very long. All the data points to long-term climate-related changes in weather patterns, and particular increased length and severity of droughts, across most of the project area. This will result in declines in vegetation and soil carbon storage. Although the project in principle acknowledges this, it dismisses such concerns by pointing to some hoped-for increases in grazing availability due to the project's own activities. However, there is no empirical evidence presented to suggest that these have had any sustained success or can in any way compensate for the long-term negative effects of climate change.	This comment on permanence is addressed by the data in the report "Modeled and Measured Soil Carbon Dynamics in the Northern Kenya Rangelands Carbon Project." The data provided in the report demonstrate there is a trend of increased NDVI independent of rainfall. This trend shows that carbon is accumulating despite increases in human population and livestock numbers and higher than normal drought frequencies. A drying climate does not necessarily imply a loss of soil carbon – more carbon can actually be stored in drier soils due to reduced microbial activity. ³ Grassland productivity is affected by multiple inputs in addition to rainfall, and the observed shifting from annual to perennial grasses has increased resilience to climate impacts.	This is not a scientifically sound comment; it is clear from numerous scientific studies that rotational grazing regenerates degraded land over time.
6. Consultation, free prior and informed consent, and grievances To date (including the Second Monitoring Report) there is wholly unconvincing evidence presented that NRT has properly informed communities about the project, let alone received their free prior and informed consent to it. We note that this was a matter of concern in both the validation and first period verification, and that the concerns about this largely remained unresolved. Provision of information about the project has, at best, been limited to a very small numbers of people, mostly those associated with Conservancy bodies (such as the Boards), often not in native languages, and for the most part only long after the project had already advanced. The project's response to the auditors during the first verification suggest that there was almost no meaningful provision of information –and hence no possibility of obtaining any form of consent – during the years 2017-2020 as covered in the second verification period. It is clear from our own investigations that, to date, very few people in the project area – including even those on the Boards of Conservancies – have the least idea of what the project is about, nor their roles, responsibilities and supposed benefits from it. It is also highly concerning that there is no mechanism for grievances over the project (as opposed to employment grievances, as referred to by NRT in the Project Document). NRT may not technically have, as they claim, received any complaints during the second	The "concerns" were sufficiently resolved for the Project to be successfully validated and for the first monitoring period's operations to be verified. To the extent that the commenters continue to have concerns, we invite them to join us in a conversation as we work continuously to improve our community engagement.	During RCE's site visit, we confirmed that stakeholder engagement takes place. Evidence reviewed by RCE demonstrates that the Project Proponent is meeting Verra's requirements for stakeholder engagement.

verification period, but this could simply be because a/ almost no one knew of the project during that period and b/ there was no complaint mechanism. There have certainly been serious complaints recently, including at least one conservancy formally withdrawing from the project.		
7. Legal basis of the project There are very serious issues relating to the legal basis of the project – or otherwise – and the way it has been implemented. At least half of the project area consists of Trust Lands, which are subject to the terms of the Community Lands Act 2016. This places responsibilities and obligations on any bodies seeking to carry out activities on Trust Lands, and mandates a central role for County governments in holding the lands in trust until such time as they are formally registered by communities. As yet, none of the Trust lands in the project area have been registered (and NRT appears to be actively obstructing such registration). There is no evidence that NRT has complied with various important requirements of the Community Lands Act 2016 in its implementation of the carbon project. The very legal basis of the establishment by NRT of conservancies in Trust Lands has been challenged through a constitutional petition presented on behalf of communities within the carbon project area, and others, to the Isiolo Environment and Land Court in September 2021, a case which is still in process.	The 2010 Kenya Constitution can be read here. The Wildlife Conservation and Management Act of 2013 can be read here. The Kenya Community Land Act of 2016 can be read here. The Regulations implementing this act can be read here. The Northern Kenya Rangelands Carbon Project started in 2013, before the enactment of the Kenya Community Land Act 2016. There are no requirements in either the act, or the regulations, applicable to NRT's development and conduct of a voluntary carbon sequestration project with the participating conservancies. The County Government holds unregistered community lands in trust on behalf of communities until they are formally registered. This does not preclude such communities from creating and operating conservancies under the Wildlife Conservation and Management Act of 2013, nor does it preclude such conservancies from participating in a voluntary carbon sequestration project. Eight out of the 14 community conservancies participating in the Carbon Project were already registered group ranches which have since transitioned to community lands. All the participating conservancies in Samburu County and Laikipia County have transitioned to the Community Land Act 2016 through the support of NRT, County Governments and other partners. They all have community title deeds. In these areas, The Community Land Management Committees doubles as Conservancy Board as per Community Land Act of 2016. The remaining Isiolo County and Marsabit County participating conservancies are in the process of transitioning to the new Community Land Act 2016. The conservancies in these two counties are governed by democratically elected local boards from the community. All community conservancies, whether in community land or trust land, conduct democratic elections for their board of directors. All but the Isiolo project conservancies have received Letters of No Objection from their respective County Governments, ensuring the support the government has for this project (letters attached). The Isiolo County Government has acknowledged receipt of notice of the project (attached), has raised no objection, has made public statements in support of the project, and has accepted project revenues provided by the conservancies. With the change in administration from the last election, NRT has restarted	The communities' land rights and rights to conduct and benefit from the project activity in the project area were reviewed as part of the assessment of the project design, which was completed during the project's validation, carried out by a VVB other than RCE. The validation report includes details on reviews of Letters of Intent by each conservancy. During the monitoring period under verification, communities exist as Group Ranches under the Kenya Land Act of 1968 or are located on Trust lands under the Kenya Trust Land Act of 2010 and the Community Lands Act of 2016. Grazing rights are also conferred through these acts. There was no evidence that any changes to property and land use rights occurred during this monitoring period. The same 13 conservancies that have been part of the project since initiation and validation were still part of the project during this monitoring period. At the time of validation, the project was confirmed as meeting the applicable laws. RCE confirmed that there have been no changes to these laws or to the structures of the conservancies. RCE reviewed the letters of no objection referenced in Native's response as well as the acknowledgement of receipt of the request for the Letter of No Objection from the Isiolo County government on 23 February 2022. RCE observed no evidence of objections from Isiolo County Government. RCE also reviewed an attestation from NRT that it complied and remained in compliance with all national laws and regulations. RCE concluded that the Project is in conformance with the CCB rules during the monitoring period and that no changes to the project design are necessary. Also see section 4.3.13 of this verification report.

	the formal approval process. The Kenya 2010 Constitution and the Land Act of 2016 legally recognize communities' customary land rights regardless of whether they are registered or not. The Community Land Act of 2016 enables the local communities to legally claim, own and manage the land that they depend on for their livelihood, culture, and identity. The Community Conservancies falling under Trust Lands have the constitutional right to be accessing any resources within their traditional land, and neither the Acts nor regulations negate any investments. The Isiolo County communities from which the cited petition arose are not participants in the project.	
8. The basis of NRT's rights to 'own' and trade carbon from the respective lands. In addition to questions about the legality of some of the Conservancies, and apparent non-compliance with the Community Lands Act (CLA), there are serious doubts about the basis on which NRT has obtained the rights to trade the carbon putatively stored in the soils of the Conservancies. A formal agreement to this effect was not signed between NRT and the Conservancies until June 2021 – eight and half year after the project started, and entirely after the period covered by the second verification. In other words, even setting aside (non-)compliance with the CLA 2016, NRT did not have a clear contractual right to sell the carbon during this period.	Each of the participating conservancies signed a Letter of Intent to participate in the Project in 2015. In 2017, each signed a binding Consent and Waiver, consenting to NRT entering into the marketing and sale agreement with Native with respect to the Project Verified Emissions Reductions, and waiving their rights, in favor of NRT and Native, to all VERs that had been or would be produced by the Project, other than their rights vis-à-vis NRT to proceeds from the sales thereof. Sales occurred only after all such Consents and Waivers were signed. Copies thereof can be provided to the VVB on a confidential basis upon request.	Ownership of credits is generally assessed as part of the initial validation. RCE was not the initial validator; however, RCE reviewed the validation report and conclusions and agrees that the project has met all Verra Standard requirements and all protocol requirements for this project type.
9. Distribution of benefits, and outcomes We have serious concerns about how the funds generated through carbon sales are being distributed. Whilst the project claims that the 30% of the total funds to be distributed to the Conservancies are for purposes which the 'communities' themselves determine, this largely proves not to be the case. 40% of the Conservancies' portion has to be spent on NRT's prescribed grazing practices (which, as above, is contrary to cultural norms) and rangers. These latter are widely held to be responsible for serious human rights abuses, the favouring (<i>sic</i>) of specific ethnic groups, and increasing the availability of weapons in the area, thus exacerbating inter-ethnic conflicts. The remaining 60% of the Conservancies' portion of the funds is distributed at the discretion of NRT, through a largely opaque process, which community leaders in the project area believe is used to exert control over communities and to promote NRT's own priorities.	The commenters fundamentally misunderstand the arrangement among NRT and the conservancies regarding distribution and uses of funds. Beyond that, as neither the Verified Carbon Standard nor the Climate, Community and Biodiversity Standard requires revenues to be shared among project participants in any particular manner, we have no further comment.	During the site visit, a member of the verification team witnessed firsthand how the revenue generated by the Project is shared with project conservancies (see further detail in sections 4.3.4, 4.5.1, 4.5.10, and 4.5.12 of this verification report). The verification team also discussed the distribution of project revenues with the project proponent which includes distributing 60% of the project proponent's share of revenues (30% of gross revenues) to project conservancies. Conservancies must formally apply for the use of funds to maintain a record of the decision-making process and promote good management of the funds (i.e. the money is not just handed over to each conservancy, they must follow defined procedures to obtain the money). The remaining 40% is used by the project proponent for project costs and conservancy operation costs (for example peace, governance, wildlife and environment operations).. In addition to Native's response to the public comment, shown in the second column of this table, the verification team also reviewed NRT's response to the public comment refuting claims of "land grabbing and human rights abuses".

		Furthermore, the verification team reviewed other documents which help establish whether allegations—including those of human rights abuses, lack of free prior and informed consent, corruption of NRT, and the legal basis of the Project, among others—raised in the public comments (and elsewhere) are true and whether the Project was in conformance with CCB rules during this monitoring period. One such document is the <i>Due Diligence Report, Concerning the Report Stealth Game Published by the Oakland Institute</i>, by Dr. Kanyinke Sena, PhD, an Indigenous Kenyan with Maasai and Ogiek ancestry who has extensive contacts in the relevant areas of Isiolo, Laikipia, and Samburu counties, and has worked in the field of Indigenous rights and development inside and outside of Kenya for decades. The report was based on a review conducted over four months in 2022 in response to the Oakland Institute's 2021 <i>Stealth Game</i> report on NRT, which includes some of the same allegations provided in the public comments received for this monitoring period of the Project. In summary, the review found no evidence that NRT-directed assets were fueling conflict, no evidence that NRT or the conservancies caused anyone to lose any land rights or access, no evidence that any killings cited in the <i>Stealth Game</i> report were linked to NRT, and no evidence to validate any of the <i>Stealth Game</i> report's allegations of corruption linked to NRT. The <i>Due Diligence Report</i> provides valuable context about the project area including acknowledgement that severe human rights impacts are prevalent in the region; however, NRT did not cause these impacts. Due to the growth of conservancies in the region, NRT's involvement in sensitive issues grows with it. Another document is a letter from the Biliqo Bulesa Community Conservancy (one of the project conservancies), dated April 2023, which is a response to the Waso Paralegal Network's statement on behalf of "the Borana Council of Elders". In summary the letter from Biliqo Bulesa Conservancy states that the Waso Paralegal Network does not have the right to speak on behalf of the conservancy, refutes allegations of killing by NRT in the conservancy, and voices support for NRT's work in the conservancies and the Project. Based on these reviews, the verification team concluded that there is a lack of evidence to support the allegations made in public comments and by groups including Survival International, the Oakland Institute, and the Wasa
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		Paralegal Network on behalf of the Borana Council of Elders. The independent reviews and responses by project conservancies refute allegations made against NRT and the Project.
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