NORTHERN KENYA GRASSLAND CARBON PROJECT VCS VALIDATION REPORT



Document Prepared By: Aster Global Environmental Solutions, Inc.

Project Title	Northern Kenya Grassland Carbon Project
Version	Report Version 01
Project Location	Kenya
Report ID	VO14090.00val

Report Title	Northern Kenya Grassland Carbon Project VCS Validation Report
Client	Northern Rangelands Trust
Pages	332
Date of Issue	07 April 2020
Prepared By	Aster Global Environmental Solutions, Inc.
Contact	Corporate Office: 3800 Clermont St. NE, North Lawrence, Ohio 44666; Phone: 330-294-1243; www.asterglobal.com
Approved By	Janice McMahon (President) and Shawn McMahon (Vice President/Lead Validator)
Work Carried Out By	Lead Validator: Shawn McMahon; Validation Team Members: Richard Scharf, Eric Jaeschke, Aaron Holley, Caitlin Sellers, and Matthew Perkowski; Senior Internal Reviewer: Barbara Toole O'Neil; QA/QC: Janice McMahon

Summary:

The Northern Kenya Grassland Carbon Project comprises Agricultural Land Management (ALM) project activities under the Verified Carbon Standard (VCS) sectoral scope of Agriculture, Forestry and Other Land-Use (AFOLU). The Project encompasses over 2.15 million hectares (>5.3 million acres) of community settlements in 14 conservancies located within a large portion of northern Kenya savannas and grasslands. Through adherence to VCS Methodology VM0032 (version 1.0) and Climate, Community & Biodiversity Standards (Third Edition, June 2017), the Project will reduce and remove greenhouse gases from the atmosphere by implementing sustainable grassland management and engaging and benefitting various community members within and affected by the project.

The VCS validation purpose assessed compliance with the VCS Version 4 Program Guide, Standard, adherence to the approved VM0032 Methodology, all associated updates, and the likelihood that implementation of the planned GHG project will result in the GHG emission removal enhancements as stated by the Project Proponent (ISO 14064-3:2006).

The CCBA validation purpose assessed the likelihood that implementation of the planned GHG project will result in the GHG emission removal enhancements (climate), community, and biodiversity benefits as stated by the project developer (ISO 14064-3:2006). The validation objective is to ensure the project design documentation is in compliance with CCB Standards (Third Edition).

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

The criteria followed the validation guidance documents provided by VCS located at https://verra.org. Unless otherwise indicated, the assessment was performed against the most recent version of the relevant VCS guidance document as of December 2019.

During validation to the VCS Program, 114 findings were raised, while during validation to the CCB Standards, 63 NCRs, 4 CLs and 1 FAR findings were raised. A summary of all VCS findings are included in Appendix A, and CCB findings are included in Appendix B.

A risk-based approach was used to guide the validation and reach a reasonable level of assurance that no errors, omissions, nor misrepresentations resulting in a material misstatement would occur. The materiality threshold dictated by the large project size was 1%. The project will take uncertainty deductions for all years (2013-2042) over a 30-year crediting period, which was required as part of the methodology. All findings were satisfied to a reasonable level of assurance.

After completion of 3 site inspections and review of all project information, procedures, calculations, and supporting documentation, Aster Global Environmental Solutions, Inc., (herein referred to as Aster Global or the Validation Team) confirms the Project Design Documentation (PDD/PD) provided by the Project Proponent is accurate and consistent with all aforementioned VCS Version 4 criteria, CCB Third Edition criteria and the selected methodology (VM0032). Aster Global confirms *The Northern Kenya Grassland Carbon Project* Project Document (05 January 2020, v5.3) has been implemented in accordance with VCS Version 4 and CCB Third Edition criteria.

Aster Global confirms all validation activities – including objectives, scope and criteria, level of assurance, and Project Description adherence to VCS Version 4 (and all associated updates) and CCB Project Design Standards (Third Edition) – as documented in this report, are complete. Aster Global concludes without any qualifications or limiting conditions *The Northern Kenya Grassland Carbon Project* (05 January 2020, v5.3) meets the requirements of VCS Version 4 (and all associated updates) and CCB Project Design Standards (Third Edition). In addition, Aster Global asserts the project complies with the

criteria for projects set out in the Third Edition of the CCB Standards to achieve Gold Level distinction for Climate Change Adaptation, Community and Biodiversity.

Table of Contents

1 Introduction 5
1.1 Objective 5
1.2 Scope and Criteria 5
1.3 Summary Description of the Project 6
2 Validation Process 6
2.1 Audit Team Composition (*Rules* 4.3.1) 6
2.2 Method and Criteria 7
2.3 Document Review 8
2.4 Interviews 8
2.5 Site Inspections 10
2.6 Public Comments (*Rules* 4.6) 11
2.7 Resolution of Findings 11
3 Validation Findings 12
3.1 Summary of Project Benefits 12
3.2 General 16
3.3 Climate 28
3.4 Community 42
3.5 Biodiversity 48
4 Validation Conclusion 54
Appendix A: Verified Carbon Standard Findings 56
Appendix B: Climate, Community and Biodiversity Standard Findings 173
Appendix C: Documents From Client 280

1 INTRODUCTION

1.1 Objective

For this project, the validation objective was to ensure the Project's compliance with the VCS Version 4 Program Guide, VCS Standard, CCB Standards (Third Edition), selected methodology (VM0032), and all associated updates.

1.2 Scope and Criteria

The scope of the validation[1] included the GHG project and baseline scenarios; physical infrastructure, activities, technologies and processes of the GHG project; GHG sources, sinks and/or reservoirs; types of GHGs; and time periods covered. The geographic scope is defined by the project boundary, the carbon reservoir types, management activities, contract periods, and related. The scope of the GHG project was outlined by the Project Proponent within the Project Description dated 05 January 2020 and is re-defined as follows:

Baseline Scenario	Continuous grazing, whereby animals repeatedly graze the same site in small loose groups. Animals are moved seasonally, but are more likely to graze near water.
Activities/Technologies/Processes	Adoption of sustainable grassland management through adjustment of fire and grazing regimes and by increasing community and biodiversity benefits.
Sources/Sinks/Reservoirs	Carbon Pool: Soil organic carbon (SOC) GHG Sources: Grazing animals (CH_4)
GHG Type	CO_2, CH_4,
Time Period (start date, crediting period)	Start date: 10 December 2012 Crediting Period: 30 years (10 December 2012 – 09 December 2042)
Project Boundary	• Northern Rangeland Trust (NRT) – umbrella organization for 14 conservancies • Approximately 2.15 million ha project area • Community settlements throughout project area (<500 people) • Kenyan savanna grasslands extending northward from the northern slopes of Mt. Kenya

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

- *VCS Program Guide (v4, 19 September 2019)*
- *VCS Standard (v4, 19 September 2019)*[2]

[1] Section 4.3.4 of ISO 14064-3:2006

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

- *Program Definitions (v4, 19 September 2019)*
- *AFOLU Non-Permanence Risk Tool (v4, 19 September 2019)*
- *VM0032 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing (v1.0, 16 July 2015)*
- *Climate, Community & Biodiversity Standards, v3.1 (21 June 2017; Third Edition updates)*
- *CCB Program Rules, v3.1 (21 June 2017)*
- *CCB Program Definitions; v3.0 (21 June 2017)*

1.3 Summary Description of the Project

The Northern Kenya Grassland Carbon Project comprises Agricultural Land Management (ALM) project activities under the Verified Carbon Standard (VCS) sectoral scope of Agriculture, Forestry and Other Land-Use (AFOLU). The Project encompasses over 2.15 million hectares (>5.3 million acres) of community settlements in 14 conservancies located within a large portion of northern Kenya savannas and grasslands. Through adherence to VCS Methodology VM0032 (version 1.0) and Climate, Community & Biodiversity Standards (Third Edition, June 2017), the Project will reduce and remove greenhouse gases from the atmosphere by implementing sustainable grassland management and engaging and benefitting various community members within and affected by the project.

These activities will be accomplished by actively planned grazing and livestock movements, as opposed to overgrazing in the baseline scenario. This will facilitate recovery of perennial grasses, leading to reduction and removal of 50.8 million tCO_2 equivalents of greenhouse gases from the atmosphere over the life of the project.

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

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

2 VALIDATION PROCESS

2.1 Audit Team Composition (*Rules* 4.3.1)

For VCS/CCB validations, Aster Global maintains an experienced internal staff of Lead Validators, in addition to Certified Foresters, Registered Professional Foresters, The Wildlife Society Biologists, M.S. Forest Biometricians, Remote Sensing/GIS Specialists, and VCS-approved AFOLU Experts in IFM, REDD, and WRC categories. Aster Global's own Lead Validator and Project Specialist (e.g., a trained soil scientist) were on-site conducting the field validation activities, and subcontractors included on the audit team were employed for translation services (as applicable). Aster Global

completes all calculation/modeling review in-house with our team of forest biometricians, remote sensing experts, and a soil scientist. Aster Global has been involved in 35 VCS validations and 32 CCB validations, including many methodology assessments. Aster Global has a specialist on staff with 9 years of CCB experience who handles all CCB components for project review. All Aster Global staff involved in the validation audit have ecological, biodiversity, natural resources and forestry background to ensure the necessary skills and qualifications required to complete the validation are included.

2.2 Method and Criteria

The validation assessed the Project's compliance with VCS Version 4, CCB Third Edition, all associated updates, and the selected methodology (VM0032, v1.0). The Validation Team assessed the *ex ante* Greenhouse Gas (GHG) emission reductions/removals through Agriculture, Forestry and Other Land Use (AFOLU) criteria, specifically Agricultural Land Management (ALM). The Validation Team assessed whether the Project Proponent adequately addressed project emissions, unplanned reductions in carbon stocks, and any possible leakage outside of the project boundary.

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

- Project conformance to VCS rules;
- Project conformance to the applied methodology, including the procedure for the demonstration of additionality specified in the methodology; and
- Likelihood that methods and procedures set out in the project description will generate verifiable GHG data and information when implemented.[3]

The criteria followed the guidance documents provided by Verra at https://verra.org. Unless otherwise indicated, the assessment was performed against the most recent version of the relevant VCS or CCBA guidance document. Refer to Section 1.2 of this report for details of versions against which the project was validated.

In the validation process, there is a risk that potential errors, omissions, and misrepresentations will be found. Therefore, a risk-based approach was used to guide the collection of appropriate and sufficient evidence to support a *reasonable* level of assurance. A risk-based approach means the Validation Team focused on items that might result in a material misstatement of the reported project conformance to VCS/CCB rules and the applied methodology.

A project-specific Validation/Verification and Sampling Plan (VVSP) was developed to guide the auditing process and ensure efficiency and effectiveness. The purpose of the VVSP was to present a risk assessment for determining the nature and extent of procedures necessary to ensure the

[3] VCS Guidance: Validation and Verification Manual, v3.2, 19 October 2016

risk of auditing error was reduced to a reasonable level. The VVSP methodology was derived from all items in our validation process stated above. Specifically, the VVSP utilized the VCS and CCBA guidance documents and ISO 14064-3. Any modifications applied to the VVSP were made to detect the project activities and processes containing the highest risk of material discrepancy. A detailed field plan was developed to guide the site visits and is embedded within the VVSP.

For the field sampling effort, direct measurement, observation, and interviews were conducted in key areas determined to be the greatest risk, followed by ground-truthing and review of project activities. Field sampling and techniques were based on the project parameters/scope and best professional judgment of the Validation Team/Lead Validator to meet a *reasonable* level of assurance.

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

The desktop validation component included a full review of all project documentation and calculations (data checks) received from the Project Proponent as described throughout this report.

2.3 Document Review

A detailed review of all project documentation was conducted to ensure consistency with, and identify any deviation from, VCS Program requirements, CCB program requirements, and the methodology (VM0032). Initial review focused on the PD relative to the field conditions observed and interviews with project management staff. Project details, data and parameters, and *ex ante* quantification of GHG emission reductions and removals were thoroughly examined. Key supporting documents were also reviewed. These included remote sensing/Geographic Information System (GIS) data, Standard Operating Procedures (SOPs), financial analyses, property boundaries, maps and aerial images, carbon calculation spreadsheets, CCB interview/survey results, and responses to Non-conformance Requests (NCRs) and Clarification Requests (CLs).

The VCS AFOLU Non-Permanence Risk Tool was used by the Project Proponent to assess overall project risk. The VVB reviewed the Non-Permanence Risk Report provided with the supporting documentation and confirmed the Project adheres to the requirements set out in the VCS AFOLU Non-Permanence Risk Tool. Each risk factor was thoroughly assessed for conformance. Any identified NCR and/or CL findings related to the AFOLU Non-Permanence Risk Tool/Report are presented in Appendix B. The final score was calculated to be 16%.

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

2.4 Interviews

Interviews were performed during the validation site inspection and as part of the overall validation process, and additional detail to that provided in the Project Description is included below. The

validation team met with individuals with various roles in the project. This included a series of interviews with on-site and in-country staff who support the mission of the project and other conservation objectives. On-site interviews and informal discussions were conducted during the 3 site visits (22-28 September 2015, 11th-17th June 2017, 20th – 28th March 2018) with Project staff, Soils for the Future, The Nature Conservancy, Northern Rangelands Trust, Grevys Zebra Trust, Native Energy and members and leaders of the local communities/conservancies.

Interview questions were tailored, depending on the roles of the interviewees. Higher level management and technical questions were reserved for management. For grazing coordinators and sampling staff, interview discussions revolved around the worker's understanding of his/her role in the project, rights as an employee, general treatment by management and personal views on project activities. Interviews and discussions with community members and groups concentrated on awareness and understanding of the project, expected benefits and risks, the information provided to them by project developers, and questions regarding the amount of input they had into project plans and potential benefits.

The interviews confirmed with reasonable assurance that community members are unlikely to be negatively affected by the project, community members were eagerly participating in project activities, staff and technical teams are well-trained, and the conservation goals of the project are being achieved. The following is a list of key interviewees:

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

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

2.5 Site Inspections

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

Three site visits took place 22-28 September 2015, 11-17 June 2017, 20-28 March 2018. During the first two site visits, greater than 130 staff and stakeholder interviews took place at Lewa,

Kalama, Westgate, Sera, Namanyuk and Melako conservancies. The focus of the third site visit was resampling soil organic carbon plots. During all three visits, soil plots were resampled, including 18 during the first site visit, 17 during the second site visit and 25 during the third site visit. Greater detail on the outcomes from the staff and stakeholder interview, and the soil sampling efforts, can be found in the VCS findings (appendix A) and CCB findings (appendix B).

2.6 Public Comments (*Rules* 4.6)

Per the Verra project database, this project was open to public comments for its validation and first verification to the CCB Standards from 04 March - 03 April 2019.

No public comments were received.

2.7 Resolution of Findings

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

The process of resolution of findings involved six rounds of assessment by Aster Global. Findings were resolved during the validation by the Project Proponent implementing corrective actions, such as amending the soil sampling methodology, revising the Project Document and calculations, as well as providing written responses. This resulted in project documentation in conformance with the requirements of the VCS Standard (V4) and CCB Third Edition for GHG projects.

Findings were characterized in the following manner:

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

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

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

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

During the validation, 114 essential VCS findings were identified. For CCB, 63 NCRs, 4 CLs and 1 FAR were issued. Detailed summaries of each VCS finding, including the issue raised, responses, and final conclusions, are provided in Appendix B VCS NCR/CL/OFI SUMMARY. Please also see APPENDIX C: CCB NCR/CL/OFI SUMMARY for all findings raised during the CCB review. All NCRs/CLs were satisfactorily addressed.

2.7.1 Forward Action Requests

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 see in Appendix A for further details.

Additionally, 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 that exist over dispute of land ownership and usage rights.

3 VALIDATION FINDINGS

3.1 Summary of Project Benefits

The Project has described climate, community and biodiversity benefits in its Project Document (PD). The benefits are reported in the Cover Page of the PD, and described throughout the Project's reporting. Sections 3.3, 4.4 and 5.4 of the PD describes all monitoring required of project benefits.

Climate benefits will result from the main project activity of planned rotation grazing. This will achieve the GHG reductions or removals of 50.8 million tCO_2e over a 30-year period.

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

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

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

Unique Benefits of Project	Section Reference	VVB Summary of Review
"1) Local communities, oriented around 14 wildlife Conservancies organized under a NGO called the Northern Rangelands Trust, engage in new planned rotational grazing practices, as opposed to repeated, permanent grazing simultaneously on all grazing lands. These new practices, which would not occur without significant carbon revenues to motivate change in herder behaviour, will allow recovery of perennial grasses and the restoration of soil organic carbon. This is one of the first improved grazing management projects, and at its inception, it will likely triple the land area under projects focused on removing greenhouse gases to soil organic carbon.	1.3.5	The Validation Team confirmed the project benefit through site visit observations, meetings and interviews with conservancy and community members; review of soil samples; review of project calculations; and review of all other project documentation. The stated section reference is correct.
2) The project will yield significant removal of CO_2 from the atmosphere, through improved grazing management, verified as altered grazing intensities, records of the time, timing and number of livestock grazers using different portions of the project zone, and vegetation change across 2.01 million ha, with 1.71 million ha of soils suitable for storing carbon. With expected annual removals of approximately 0.75 metric ton CO_2e/ha on average, the project should eventually annually remove more	5.1	The Validation Team confirmed the project benefit through site visit observations; review of soil samples; review of project calculations; and review of all other project documentation. The stated section reference is correct.

than 1 million tons CO_2e and 30.7 million tons CO_2e over the project lifetime.		
3) Multiple communities and ethnic groups will participate in an annual regional grazing plan that allows livestock to move over long distances and efficiently use wet and dry season range. This provides unprecedented rest and opportunity for recovery of vegetation and assimilation of carbon from the atmosphere into roots and soil organic matter.	2.4	The Validation Team confirmed the project benefit through site visit observations, meetings and interviews with conservancy and community members; and review of all other project documentation. The stated section reference is correct.
4) Clear long-term benefits will result from restoring perennial grasses as a consequence of rotational grazing will provide grass banks and a lower likelihood of catastrophic livestock loss during drought, sustained meat and milk production through the dry season, and heavier livestock that are saleable in the burgeoning Kenya beef market. Improved soil organic matter should help increase rainfall infiltration and lengthen the time surface water is available for people and livestock. Payments to communities through NRT will also be used to fund health care and bursaries that provide benefits to the poorest community members, such as paying school fees. In the short term, grazing plans have led to a stronger perception of community connection to land, reduced conflicts over grazing, and some re-claiming of Conservancy areas that were previously thought to be unsafe, as revealed by the results	6.2	The Validation Team confirmed the project benefit through site visit observations, meetings and interviews with conservancy and community members; and review of all other project documentation. The stated section reference is correct.

of focus group interviews and household surveys. These benefits to both financial, social and natural capital at the level of both communities and individuals have reduced tensions between ethnic groups and fostered better collaboration among different Conservancies, leading to greater physical and social capital. Revenues to communities should help develop infrastructure such as schools, health clinics, water collection and storage facilities, thus increasing human capital by reducing food and water insecurity.		
5) The ecological vegetation and soil changes from the implementation of the project should also enhance the region's role as a High Conservation Area for key endangered species, such as Grevy's zebra (*Equus grevyi*), black rhino (*Dicornis biceros*), and elephant (*Loxodonta africana*). It will also benefit other endemic bird and ungulate species in the project area's biogeographical position connecting species from the Rift Valley to the south to the Sahel to the west. Also, the project should improve species diversity across a number of groups of key bio-indicator taxa, including plants, birds, and key insect groups, such as grasshoppers (Orthoptera) and dung beetles (Coleoptera: Scarabeidae). The potential for the project to enhance biodiversity is evident from effects of improved grazing on these groups detected by comparing year-round grazed	7.1	The Validation Team confirmed the project benefit through site visit observations and review of all other project documentation. The stated section reference is correct.

areas vs protected areas and those with limited grazing use. The project will also reduce pressure from livestock use during drought in isolated "sky island" forests on mountain ranges adjacent to the project area but within the project zone, such as the Mathews and Ngare Ndare Forests."[4]		

3.2 General

3.2.1 Summary Description of the Project (G1.2)

The project's climate goal is the removal of CO2 from the atmosphere and sequestering it as soil organic carbon by replacing unrestricted grazing with active, planned movements of livestock, over about 2 million hectares of grazing land in northern Kenya, including the conservancies of Biliqo Bulesa, IL Ngwesi, Kalama, Lekurruki, Leparua, Meibae, Melako, Naibunga, Nakuprat-Gotu, Namunyak, Nasuulu, Oldenyior, Sera and Westgate.

The project proponent is the Northern Rangeland Trust. Soils for the Future is the main contact and technical consultant, Native Energy is the project marketer/developer, The Nature Conservancy provided fund-raising, social monitoring and administrative support, NRT Trading provided some financial risk abatement. The individual conservancies, themselves, provide the cattle, land, wildlife and social monitoring.

The project start date was 10 December 2012, which was the date of the TNC/NRT charter, initiating grazing plans by the first four conservancies and the signing of the joint MOU between NRT and TNC.

This is a large-scale project. Estimated removals for the life of the project are 37,333,045 tCO_2e.

Prior to project initiation, the project area was used by the local people as rangeland for grazing livestock in an unrestricted, unplanned way. Poverty is higher in this part of Kenya than other areas, drinking water access is a problem, slightly more than 50% of the adult population is illiterate. The population of the project area is multi-ethnic with distinct cultural traditions, but share the same pastoral socio-economy of herding mixed herds of cattle, goats, donkeys and camels. The land was overgrazed, with minimal grass cover and degraded soils.

[4] Northern Kenya Grassland Carbon Project *Project Description*, 05 January 2020, v5.3

Community objectives include the development of improving rangeland and improving drought resilience. The project will also distribute funds through NRT to communities, which will develop their own priorities on how the funds will be used.

Biodiversity benefits stem from improved range conditions, which will benefit the threatened and endangered species, as well as wildlife populations in general.

The project description document describes the project and the pre-project conditions accurately and completely.

3.2.2 Physical Parameters (G1.3)

The PDD describes the project area as savanna grassland with semiarid conditions. The site visit was conducted by a professional forester and a soil scientist, each with decades of experience. During the first two site visits, the region was facing a severe drought. While the woody savannah vegetation was present (many Acacia species), grasses were almost nonexistent. Parts of the project area received rain before the 3rd site visit, and grasses were covering he soil in areas that had received rainfall.

Geographic features, like lava flows, cinder cones and mountain ranges were observed firsthand. All soil types, except for the clay soils of the northeastern part of the project area, were observed and sampled during the site visits.

The nature of the landscape, the peoples' pastoral way of life and the degraded rangeland conditions were all observed, firsthand. Soil samples were taken during the site visit, which compared favorably with data supplied by the project.

3.2.3 Social Parameters (G1.3)

The basic parameters of population density and ethnicities were confirmed during the site visit through observation and interviews.

The pastoral way of life followed by most community members was evident during the site visits, as were relative socio-economic levels. Many stakeholders live in traditional shelters made of branches, newspaper, tarps and other available materials, in bomas fenced with dry shrubs and branches.

Interviews with community members confirmed the descriptions of life, provided in project documentation.

3.2.4 Project Zone Map (G1.4-7, G1.13, CM1.2, B1.2)

The project zone is essentially the project area, with the inclusion of the forest and game reserve areas that are excluded from the project area (see violet areas on the map in figure 1).

During the site visit, points along the project area/zone boundaries, conservancy boundaries and soil sampling stations were recorded via GPS. These compared favorably with shapefiles provided by the project.

3.2.5 Stakeholder Identification (G1.5)

Stakeholders were identified with help from NRT, TNC and the Grevy's Zebra Trust, but identifying conservancy elders and community grazing committees. The stakeholders, in turn, helped with identification of additional stakeholders and aided in community monitoring efforts.

Monitoring led to the recruitment of community members, including under-represented groups, for focus groups and feedback. Monthly community meetings helped identify additional in-project stakeholders.

Meetings with individuals and community groups during the site visits, as well as interviews with grazing scouts, coordinators and NRT personnel, confirmed that an identification process like the one described in the project documentation, occurred.

3.2.6 Stakeholder Descriptions (G1.6, G1.13)

Discussions with NRT personnel, conservancy grazing coordinators, field sampling teams, scouts and Kenyans in general, revealed that all people are keenly aware of their own ethnic group and the ethnic groups of those around them. Conservancies are typically dominated by one ethnic group.

Site visit interviews also confirmed the social status levels within ethnic communities, which revolved around the ownership and control of livestock, including owners, grazing committees, women heads of household, women in male-led households, households without livestock and morans. No people encountered or discussed fell outside these stakeholder groups.

3.2.7 Sectoral Scope and Project Type

This is an AFOLU project (Sector 14), based on VCS methodology VM0032. The project activity designed to achieve carbon removals from the atmosphere is a change in grazing management, clearly within the sector.

Technologies used include remote sensing to help confirm grazing intensities and laboratory procedures to determine soil carbon content and bulk density.

The project meets most eligibility requirements and was granted a work-around for a larger-than-expected use of woody biomass for charcoal production.

3.2.8 Project Activities and Theory of Change (G1.8)

The project description maps out project activity in a causal model in figures 3 and 4. Table 2 more fully describes the short term outputs, medium term outcomes and long term impacts and their relationship to project objectives. The activity, its effects on carbon removals, local environmental change and the associated beneficial effects on communities and biodiversity is straightforward and easily understood.

The project activity changes traditional livestock management of continuous grazing to planned rotational grazing, where areas are only grazed once per year and then allowed to recover, Four of

the five long-term impacts and project objectives stem from the same short and medium-term outputs and outcomes: rest for forage plants allows plant recovery and greater seed production, which leads to increased plant production and a shift to perennial grasses and decreased bare ground.

The activity will clearly lead to an improvement of the grasslands compared to the severe overgrazing it is replacing. Vegetative growth is the source of soil organic carbon (SOC) and any activity that increases vegetative growth will increase organic matter inputs to the soil and increase the level of SOC.

The increased SOC, which was removed from the atmosphere by forage plants through photosynthesis, forming the basis for the carbon project, increases water holding capacity, providing moisture to forage plants beyond the rainy season. The longer growing season provides better conditions for livestock and more milk and meat production for communities.

The improvement in the range for livestock will also improve the range for wildlife, including six species considered threatened or endangered by the IUCN, another project goal.

The fifth short-term output is the establishment of grass banks, which are only grazed during droughts. This reduces the need for community herdsmen from taking long migratory grazing excursions, increasing personal safety by decreasing the likelihood of conflicts with other groups.

The causal relationships between the project activity, increased carbon sequestered as SOC and the multiple benefits of increased SOC are well established. The expected increase in range quality, livestock health, wildlife habitat improvement and associated health and well-being benefits to the communities are reasonable expectations from this increase in SOC.

The conclusion that the project activities will cause the benefits envisioned is sound.

3.2.9 Sustainable Development

The project is likely to improve the sustainability of the lifestyle of the communities in that the baseline grazing scheme appears unsustainable, especially in the face of rains during the rainy season becoming unreliable with climate change. Reserve grasslands are available for drought years, while the grazing style increases soil organic carbon, increasing soil water holding capacity and resilience in the range.

3.2.10 Implementation Schedule (G1.9)

An implementation schedule is provided in table 4 of the Project Description, which accurately reflect events, to date (including site visits, signing of agreements, etc.) and events projected to occur in the next few years.

The schedule is accurate and future event dates are reasonable.

3.2.11 Benefits Assessment and Crediting Period (G1.9)

The project start dateand the beginning of the crediting period are both 12 December 2012. The project lifetime and the project crediting period, each 30-years coincide, as expected. A re-assessment of soil organic carbon is scheduled for 2021, ten years after the initial sampling, as described in the methodology. This is a reasonable timeframe for the detection of SOC change.

Community and biodiversity monitoring events are listed on the schedule provided in table 2, as dictated by the monitoring plan.

3.2.12 Risks to the Project (G1.10)

One of the main risks identified that is still an important factor is maintaining community willingness to participate in the project. During community interviews, it was clear the communities were going along with the grazing plan, but they also expressed the attitude that they will graze their livestock as they see fit, leading the auditors to conclude this risk is real and may be especially high during prolonged drought, when herdsmen may be compelled to take livestock off the project area.

Mitigation plans are to quickly build up grass banks and the resilience of the land by building SOC, both of which are dependent on a reduction in drought conditions in the short term. Also, education and the development of a livetock to market program that will serve to reduce livestock numbers in anticipation of drought events can serve to mitigate thee need to stop participating in the grazing plan. This risk is expected to abate once revenues come in to support project activities.

The natural risk to the project's community and biodiversity objectives is drought, which the project activity, itself, is meant to ameliorate. Severe drought was witnessed firsthand by the audit team during the first two site visits.

Mitigation plans for these risks are sensible and the communities have continued to participate in the project during a multi-year drought.

3.2.13 Benefit Permanence (G1.11)

Long-term project benefits are expected to continue beyond the life of the project, because the activities are expected to double the carrying capacity of the land from its current value. Conservation trust funds, built from carbon revenues, will be available after the end of the revenue stream. The governing structures of the new management system will be in place and the desire to keep the system going, given the ecosystem services benefits, will still be present.

3.2.14 Financial Sustainability (G1.12)

The project proponents provided a business plan and a summary of financials, including projected net revenues and allocations, through 2042. Expected revenues are conservative and it appears likely they will provide the project with financial stability.

3.2.15 Grouped Projects

Not applicable. The Northern Kenya Grassland Carbon Project is not a grouped project.

3.2.16 Land-Use Scenarios without the Project (G2.1)

The land used scenarios identified in the absence of the project were:

- Continuous, unplanned grazing, which was the situation when the project began.
- Management as a wildlife conservancy.
- Planned rotational grazing, which is the project activity.

Options for land use in the NRT area are few, due to low rainfall and lack of financial resources. Land use changes in the absence of the project would probably not include a change in management, but they would be caused by the continued degradation of range quality and associated carrying capacity.

3.2.17 Most-Likely Scenario Justification (G2.1)

There are no barriers to continued, unplanned grazing, which has been practiced in the area for the last 40 years. Barriers to management as wildlife conservancies would require removing a lot of domestic stock in favor of wildlife. This would be difficult, given people view livestock as personal wealth Funding revenues would come from lodges and other eco-tourism related businesses. Currently, community game scouts protect wildlife resources, but wildlife populations continue to decline due to declining forage and water resources. The land may lack the capacity to support a thriving tourism industry. Planned rotational grazing requires the money to hire professional herdsmen, grazing assistants and coordinators, requires overcoming cultural traditions to combine herds for grazing and overcoming a lack of confidence in keeping animals far from home.

The site visit demonstrated that while wildlife can still be seen in the project area, the range conditions are poor and populations are not as great as other parts of the country. Inter-ethnic conflicts among members of different conservancies (and sometimes of the same conservancy) exist and active conflicts were occurring during the first site visit, emphasizing the difficulty in coordinating a grazing plan among groups of people in the project area.

The most likely land use scenario in the absence of the project is business-as-usual unrestricted grazing.

3.2.18 Community and Biodiversity Additionality (G2.2)

Due to the cooperation, coordination and labor required for the project scenario, the project scenario is very unlikely to occur in the absence of funding from a carbon project.

Traditional ethnic hostilities prevent the cooperation needed for planned grazing activities. The auditors were present on site when some of the animosities between the various ethnic groups cooperating in the project boiled over into violence. The Turkana and Samburu peoples are traditional enemies, and several people were killed during a cattle raid.

There would be little hope for project activities like this to occur without the funding for scouts and herdsmen and governing structures for cooperation provided by a carbon project.

3.2.19 Stakeholder Access to Project Documents (G3.1)

During the first site visit it was found that there was general awareness of the project, but summaries of project documentation in local languages were not distributed in a timely fashion. The project was then reposted for public comment in 2019 and time-stamped, georeferenced photos were provided to the auditors to demonstrate the availability of the summaries was announced and provided at various locations in the project area.

3.2.20 Community Costs, Risks and Benefits (G3.2)

The project held workshops explaining the project and the validation process, prior to the first site visit in 2015 and held another workshop in 2017 for the conservancies who were late in joining the project, and the other conservancies. The mechanics of project validation were explained at these workshops and a slide presentation used in the workshop was provided to the validation team.

During the site visit, interviews with stakeholders revealed that some communities were aware of the site visit, but essentially all were aware of the project activities.

Information about both the 2015 and 2017 site visits were communicated to local stakeholders and workshops explained the project, its value and risks. Considering the large project area and the remoteness and isolation of some of the settlements, communications between the project and stakeholders is effective.

3.2.21 Information to Stakeholders on Validation and Verification Process (G3.3)

During the site visits, many of the stakeholders interviewed told the auditors they were aware of the site visit, though this was not universal. Community leaders were aware of the site visits and the validation process, as described in a slideshow used during workshops which was supplied to the auditors.

3.2.22 Site Visit Information and Opportunities to Communicate with Auditor (G3.3)

Many of the people in community groups interviewed during the site visits stated they were aware the auditors were coming, before the visits, though this was not universal. In a project area of this size, with many remote, isolated areas, universal awareness of the site visits cannot be expected.

The project proponents provided time-stamped photos of notices announcing the site visits in community areas of each conservancy. In addition, many community members heard about the site visits by word-of-mouth.

Pre-visit knowledge of the site visits was widespread in the communities, though not universal. Sufficient efforts were made by project and conservancy staff to inform communities of the site visits.

3.2.23 Stakeholder Consultations (G3.4)

The plan for community influence in project design is based on social surveys to identify perceived issues. Results of the surveys are discussed at quarterly carbon project management meetings. Operational procedures are then updated, based on decisions made at the management meetings.

An example was provided in the PD. Stakeholders had a strong fear of encroachment on grazing lands from outside grazers. The project then reached out to surrounding communities and developed a rapid response to conflicts with off-site grazers.

The example provided demonstrates stakeholder consultation is effective. Impressions of the people during community meetings lead auditors to believe they would be unlikely to cooperate in the project if they didn't feel they had a strong influence in decisions. The auditors are convinced of the effectiveness of stakeholder consultations.

3.2.24 Stakeholder Consultation Channels (G3.5)

The project used village chairmen, grazing chairmen and community elders to help identify individuals from the community, especially vulnerable groups, who met as focus groups with project staff to discuss the project and their concerns about it. This is also how it was ensured that community monitoring surveys included the most vulnerable groups.

Site visit interviews and observations indicate that grazing coordinators and NRT staff are well integrated into daily life in the project area. Periodic meetings between project staff and community groups provide reasonable assurance project-related information is being shared with affected groups.

3.2.25 Stakeholder Participation in Decision-Making and Implementation (G3.6)

The gender roles of pastoralist communities in Northern Kenya are fairly well set, and it is unlikely that a carbon project will change that. Project documentation and site visit interviews and observations indicate that few women, except women heads of household with livestock, have direct influence over grazing decisions, but women do make household decisions regarding buying and selling livestock.

Women and other vulnerable groups are included in social monitoring surveys and focus groups, including households headed by women, which tend to be among the poorest community members, according to site visit interviews and observations.

3.2.26 Anti-Discrimination Assurance (G3.7)

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

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

With the grievance procedure in place and no outward indications that sexual harassment is a problem, it appears likely that sexual harassment is not a problem for the project, at this time.

3.2.27 Feedback and Grievance Redress Procedure (G3.8)

The project's grievance procedure was examined and found to have all the features required by the CCB Standard. NRT employees interviewed were aware of the procedure.

3.2.28 Worker Training (G3.9)

Aside from the soil sampling team, worker training is handled by NRT, and is guided by the NRT Human Resources Manual, which was supplied to the auditors. NRT encourages formal training.

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

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

3.2.29 Community Employment Opportunities (G3.10)

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

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

3.2.30 Relevant Laws and Regulations Related to Worker's Rights (G3.11)

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

3.2.31 Occupational Safety Assessment (G3.12)

The project documentation lists the job positions involved in the project and the potential risks inherent in each one. A set of mitigation actions for each risk is provided.

The risks and associated mitigations listed are reasonable, given the job activities and observations during the site visits.

3.2.32 Project Governance Structures (G4.1)

As described throughout the project documentation, NRT is the main management and implementation body of the project, with technical help on modeling, carbon accounting and biodiversity from Soils For The Future. Sales, marketing and branding are handled by NRT, SFTF and Native Energy. These relationships are summarized in Figure 6 of the project document.The governing structure described reflects the observations of the auditors during the site visits.

3.2.33 Required Technical Skills (G4.2)

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

3.2.34 Management Team Experience (G4.2)

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

3.2.35 Project Management Partnerships/Team Development (G4.2)

In addition to the main entities involved in the project, some credit was given to Grevvy's Zebra Trust for training that led to the adoption of rotational grazing, CIAT for help in soil carbon and plant tissue analysis, and ICRAF, who helped determine baseline carbon stocks.

Discussions with CIAT and ICRAF personnel confirm their involvement and their expertise.

3.2.36 Financial Health of Implementing Organization(s) (G4.3)

Data and assumptions provided to the auditors provide reasonable assurance the project will have the finances to be able to carry on project activities. NRT has an annual budget of about 10 million USD per year.

3.2.37 Avoidance of Corruption and Other Unethical Behavior (G4.3)

The project document states that none of the entities involved in the project are involved in any form of corruption, bribery, and the other forms of unethical behavior described in the CCB standard.

Proceeds of sales will be distributed according to pre-established contracts with the individual conservancies.

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

N/A.

3.2.39 Statutory and Customary Property Rights (G5.1)

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

3.2.40 Recognition of Property Rights (G5.1)

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

3.2.41 Free, Prior and Informed Consent (G5.2)

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

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

3.2.42 Property Rights Protection (G5.3)

The conservancies, communities and the NRT had their governing structures prior to the project. Project proponents do not require or request the relocation of anyone. If that is done, it will have nothing to do with the project and follow established methods of decision-making.

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

3.2.43 Illegal Activity Identification (G5.4)

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

Some armed disputes between ethnic groups does occur, including stealing livestock and armed takeover of grazing areas or watering places. Conflicts will be addressed by NRT and government response teams or through peace meetings.

3.2.44 Ongoing Disputes (G5.5)

Ongoing disputes generally involve cattle raiding between different ethnic groups, which is part of local tradition. This has become worse in recent years, due to the availability of firearms.

NRT has had some success in bringing groups together to discuss differences and through peace meetings.

Project activities themselves are unrelated to these kinds of disputes.

3.2.45 National and Local Laws (G5.6)

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

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

3.2.46 Approvals (G5.7)

The appropriate authorities are the conservancies themselves. The site visit interviews and group meetings demonstrated that the conservancies approve of the project.

3.2.47 Project Ownership (G5.8)

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

The Kenya Community Lands Act of 2016 confers ownership of carbon rights to the conservancies. Rights to carbon for the purpose of sales were transferred to NRT and then to Native Energy through signed Carbon Consent Declarations, copies of which were provided to the auditors.

3.2.48 Management of Double Counting Risk (G5.9)

The credits will be assigned on the APX VCS registry to avoid double counting.

3.2.49 Emissions Trading Programs and Other Binding Limits

Grassland management projects are ineligible under existing emissions trading programs.

3.2.50 Other Forms of Environmental Credit

VCS is the only standard that allows carbon credits for adjusted grazing.

3.2.51 Participation under Other GHG Programs

The project documentation states that the project will only be registered under VCS and CCB. There are no opportunities for a project with these activities to register under another GHG program.

3.2.52 Projects Rejected by Other GHG Programs

There are no other GHG programs under which a project of this nature can be registered.

3.2.53 Double Counting (G5.9)

Kenya is not participating in a compliance mechanism.

The credits will be assigned on the APX VCS registry to avoid double counting. There are no other programs where credits can be assigned for the project activities used in this project.

3.3 Climate

3.3.1 Title and Reference

The Project applies VCS VM0032 methodology ALM – Sustainable Grassland Management through Adjustment of Fire and Grazing (v1.0, 16 July 2015) and the approved VCS AFOLU Non-Permanence Risk Tool (v4, 19 September 2019). The methodology and tool are valid at the time of validation.

3.3.2 Applicability

The project adheres with each applicability condition of the methodology and associated tools, as described below.

No	Applicability Condition	VVB Conclusion
1	The project area must be grasslands in the baseline and project scenarios.	Project area is largely savannah grassland used for grazing. The VVB confirmed compliance by visiting project area and confirming land classification by GIS/remote sensing review.
2	Lands are grazed and/or subject to fires in the baseline and/or project scenarios. Lands may be used for different purposes, such as livestock production, conservation, hunting or tourism.	An Errata and Clarification document (VM0032-Errata-and-Claifications-1APR2019.pdf) was issued by VCS on 01 April 2019 related to this applicability condition (#1 Erratum) though the revision applied to applicability condition #5. Submission of Errata and Clarifications for Methodology VM0032 to the VCS corrects the language of applicability condition 3) to allow de minimis losses of woody carbon in the project area to be calculated against baseline emissions and ex ante removals
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 project has stated that social monitoring data is obtained through NRT's activities, specifically the "NRT State of the Conservancies Report for 2017". The verification team understands that these periodic reports provide awareness of incursions where livestock raiding, grazing, and land are the three most common conflict types. The project in the long term aims to incentivize retention of livestock within the project area and boundary enforcement is maintained through local patrol monitoring personnel as part of NRT's larger mission. This applicability condition is satisfied at the time of audit but a forward action request (Section 2.7.1 of this report) is issued to ensure the project continues to strive to meet it.
4	The project must result in no net increase in the density of, or time spent by animals in confined corrals where dung can pile up and begin to decompose anaerobically and result in CH4 and N2O emissions, such as an increase in the number of livestock aggregated (eg, kept in corrals or pens) that would result in more than 50 percent of the ground area covered by dung.	The validation team notes that that one of the goals of the project is to achieve greater sustainability in livestock numbers, including a change in the tradition of equating wealth with livestock numbers. The project provides no incentive to increase livestock numbers. Animals were not seen confined during the site visits.
5	Baseline emissions derived from livelihood-driven human impacts on aboveground woody biomass (eg, cutting for fuel wood, charcoal or timber sales) must be deemed de minimis (ie, not included in the cumulative 95 percent of total baseline emissions) and project activities cannot significantly alter such livelihood-driven activities. This	This applicability condition was satisfied through following the Verra approved Errata and Clarification document (VM0032-Errata-and-Claifications-1APR2019.pdf). The VCS approved revision is as follows "Baseline emissions derived from livelihood-driven human impacts on aboveground woody biomass

No	Applicability Condition	VVB Conclusion
	applicability condition was modified in an issued Errata and Clarifications to VM0032 and restated as "…must be deemed de minimis (not greater than 5% of the total greenhouse gas benefit of the project)"	(e.g., cutting for fuel wood, charcoal or timber sales) must be deemed de minimis (i.e., not included in the cumulative 95 percent of total baseline emissions less than five percent of the total GHG benefit generated by the project) and project activities cannot significantly alter such livelihood-driven activities." The results of a de minimis analysis are presented in the PD. The audit team notes that the language adjustment allows for the project to meet the applicability condition with regard to charcoal.
6	For projects that propose to modify grazing, the maximum individual project size is 3 million ha or 5 percent of a country's land area currently or potentially used to graze livestock, as judged by national government land use inventories or other documentation.	The validation team confirmed that the land used for livestock production in Kenya, which includes more land than just grazing lands, is about 42 million ha. The grazing land in the project area is about 1.3 million ha, which is about 3.1% of the grazing land in Kenya. Therefore this applicability condition is successfully satisfied.

3.3.3 Project Boundary

The VCS Standard requires that projects describe the project boundary and identify and select appropriate carbon pools, i.e., sources, sinks, and reservoirs relevant to the baseline. Procedures to quantify emissions are included for each of these pools and sources by demonstrating significance in using the appropriate VCS modules and tools. The project addresses the establishment of spatial, temporal, and gaseous boundaries to meet VCS AFOLU Requirements for the Agricultural Land Management (ALM) - Sustainable Grassland Management through Adjustment of Fire and Grazing project category. The validation team found that the major pool, soil organic carbon is appropriately considered by the methodology. Changes in carbon stocks from changes in woody biomass are assumed to be negligible because of a lack of fire in the baseline conditions and project scenarios and because people use a negligible amount of woody carbon for fuel. A de minimis analysis was provided to the validation team to support assertions that fuelwood collection is insignificant following VM0032 applicability conditions.

The spatial boundaries for the Project were assessed for conformance to VCS rules and found to be sufficiently detailed, appropriate, and adequate as well as in compliance with the VM0032 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing. Similarly, temporal boundaries were reviewed within the context of VCS rules and found to be detailed and correct.

Significant pools, sinks, and reservoirs accounted for are in compliance with VCS Standard section 3.11 and are appropriately justified for the project. The following tables present a brief review of all considered carbon pools, and the validation assessment findings:

GHG Pools in the ALM project boundary

Pool	Included	Project Justification	Validation Findings
Above-ground woody biomass	No	Optional	Validation team concludes this is appropriate following VM0032 table 2.
Above-ground non-woody biomass	No	Excluded as aboveground non-woody biomass is typically burned or decomposed within the same year of its production and therefore is not a major sink and is considered in balance with CO2 uptake, respiration by plants, and annual decomposition	Validation team concludes this is appropriate following VM0032 table 2.
Below-ground biomass	No	Excluded as below-ground biomass is typically burned or decomposed within the same year of its production and therefore is not a major sink and is considered in balance with CO2 uptake, respiration by plants, and annual decomposition	Validation team concludes this is appropriate following VM0032 table 2.
Deadwood	No	Excluded, as dead wood is negligible in grasslands.	Validation team concludes this is appropriate following VM0032 table 2.
Litter	No	In grasslands, litter exhibits high turnover which further reflects balance with CO_2 uptake, respiration by plants, and annual decomposition	Validation team concludes this is appropriate following VM0032 table 2.
Soil organic carbon pool	Yes	Included as major pool	Validation team concludes this is appropriate following VM0032 table 2 and project characteristics.
Wood products	No	Considered negligible for untilled grasslands	Validation team concludes this is appropriate following VM0032 table 2 and project characteristics.

The sources and pools selected or excluded by the project were confirmed against VCS program and methodology requirements by the Validation Team to a reasonable level of assurance.

3.3.4 Baseline Scenario

The procedures for determination of the baseline scenario in the Project were applied using the "CDM Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities". Project Proponents properly selected applicable sub-steps 1a and 1b, "Define alternative scenarios to the proposed CDM project activity" and "Consistency with mandatory applicable laws and regulations", respectively.

The result and determination by Project Proponents is the most likely land use in the absence of the project is the continuous, unplanned grazing and planned rotational grazing. Water is too scarce for other agricultural activities. The validation team observed that there are no laws giving an advantage to less emissions-intensive activities. The cheaper scenario to implement, unplanned, intensive grazing, is the most likely land use. No legal requirements are dictating any kind of grazing. The land use was unplanned, intensive grazing in the previous 10 years. Before settlement, nomadic herding was done in the region, but that is no longer possible, due to policies encouraging settlement.

Overall, the procedures for identifying the baseline scenario have been correctly followed and the identified without project scenario is reasonably expected to occur, as described in PD Section 3.1.4. The Validation Team concludes that procedures for determining the baseline are appropriate, adequate, and in compliance with VCS rules for ALM project activities applicable to this project.

3.3.5 Additionality

The Tool for the Demonstration and Asessment of Additionality in VCS Agriculture, Forestry and Other Land Use (AFOLU) Project Activities was used to assess additionality. Th Project Proponents identified three potential land use scenarios, based on the current, pre-project land use (continuous, unplanned grazing), the project activity (planned rotational grazing) and management as a wildlife conservancy, all of which would be in compliance with laws and regulatory requirements. Barrier analysis concludes there is no significant barrier to continuous grazing. No community cooperation is required, and the practice is well-ingrained in the communities. Further, it explains the cultural barriers to the project activity in the absence of funding through a carbon project, and that the skills and environmental requirements for using the land as a wildlife conservancy are lacking.

Common practice analysis shows that the project activity is not common. It is practices on a few private conservancies in the region (about 0.5% of the land area), it is used specifically in the production of young livestock for the meat market, not for the accumulation of livestock assets.

After reviewing all project documentation, site visit observations, and completing interviews with project staff, the Validation Team is reasonably assured that continuous unplanned grazing would most likely be established without the project. The Validation Team confirmed that the alternative scenarios identified by the Project Proponent represent realistic and credible land-use scenarios that could have occurred within the project area in the absence of the AFOLU project activity under VCS. The evidence provided by Project Proponents and accurate application of the CDM tool is deemed sufficient by the Validation Team for the project to be additional.

3.3.6 Methodology Deviations

No methodology deviations to VM0032 have been applied to the project.

3.3.7 Quantification of GHG Emission Reductions and Removals

Procedures for quantifying the baseline emissions were conducted in accordance with Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing. Aster Global conducted an intensive review of all input data, parameters, formulae, calculations, conversions, statistics and resulting uncertainties and output data to ensure consistency with the VCS Standard, the Project Description, and VM0032. Data with associated conversion factors, formulas, and calculations were provided by the project proponent in spreadsheet format to ensure all formulae were accessible for review. The validation team recalculated subsets of the analyses to confirm correctness and assess if data transposition errors occurred to achieve a reasonable level of assurance and to meet the materiality requirements of the project, as required by Section 5.1.3 of the VCS Standard. The project proponent also provided answers to questions on calculations to ensure the validation team understood the approach and could confirm its consistency with VM0032 and the PD. Where applicable, references for analysis methods or default values were checked against relevant scientific literature for best practice and adherence to VCS program requirements.

The Project has appropriately included baseline emissions calculations in the PD Section 3.2.1. Net greenhouse gas emissions in the baseline. Net greenhouse gas emissions in the baseline were confirmed to have been correctly quantified. Data and parameters selected for spatial and temporal boundaries were found to be properly selected and calculated accurately from verifiable sources. Baseline methane emissions from grazing animals were confirmed to follow methodology requirements using survey data and methodological animal equations. The peer reviewed SNAP model was used for SOC emission estimation. The calibration of the SNAP model for the region was confirmed appropriate by the independent expert Mr. William Wieder, in line with Verra guidance. Model outputs and computation were confirmed appropriate by independent data checks. Baseline annual removals were traced from model output to annual emission reduction calculations and confirmed to be correct.

The Project has appropriately included project emissions calculations in the PD per VM0032. The audit team confirmed that project methane emissions were computed in line the methodological requirements of VM0032. Project SOC emissions were confirmed in a similar manner to the baseline approach. The peer reviewed SNAP model was used for SOC emission estimation. The calibration of the SNAP model for the region was confirmed appropriate by the independent expert Mr. William Wieder, in line with Verra guidance. Model outputs and computation were confirmed appropriate by independent data checks. The ex-ante project emissions were confirmed for adherence to VM0032 and checked as accurate. Data and parameters for calculating and reporting project scenario ex-ante values were individually confirmed to be correct for project area boundaries.

Leakage was confirmed by the validation team as livestock overgrazing and using the VM0032 penalty method. Data used in leakage calculations was checked for appropriateness and the calculation work up to leakage emissions from displaced livestock was confirmed correct. Displacement leakage was found to be allowably negligible in addition to no required uncertainty.

Estimated GHG emission reductions for the first 10-year baseline period (through 2022) for the Northern Kenya Grassland Carbon Project are listed below:

Year Ending	Estimated GHG emission reductions or removals (tCO_2e)
2013	7,617
2014	
2015	1,666,432
2016	1,757,666
2017	1,764,674
2018	1,764,674
2019	1,764,674
2020	1,764,674
2021	1,764,674
2022	1,764,674

Uncertainty associated with the calculations of emissions was performed appropriately using the VCS methodology VM0032. Parameters factored into uncertainty calculations were assessed for accuracy and the final total project uncertainty (UTt) was found to be less than the methodology threshold for an uncertainty deduction of 30%.

The project description contained sufficient information for the validation team to assess the accuracy of quantified GHG emission reductions and removals. Relevant assumptions made by project proponents are listed and include the appropriate references and sources. The validation team deemed data and parameters to be reasonable within the context of the project. As part of the validation process, the validation team was able to successfully reproduce all GHG emission calculations and conclude that information supplied in the project description is sufficiently transparent.

3.3.8 Monitoring Plan

The parameters to be monitored were identified in section 7.3.1 of the Project Document. They include the following monitored parameters:

Data Unit / Parameter:	$PA_{m,t}$
Data unit:	Ha
Description:	Project area in stratum m in year t

Data Unit / Parameter:	$PN_{c,t}$
Data unit:	number
Description:	Mean number of animals of category c in the project area during year t

Data Unit / Parameter:	$MAP_{m,t,Y}$
Data unit:	mm/yr
Description:	Mean annual precipitation in stratum m over the crediting period Y years.

Data Unit / Parameter:	$GI_{j,m,Y}$
Data unit:	Dimensionless proportion
Description:	Mean annual grazing intensity at station j in stratum m over the crediting period Y years

Data Unit / Parameter:	$MAPLC_{j,m,Y}$
Data unit:	Dimensionless proportion
Description:	Mean aboveground plant cellulose plus lignin at sampling station j in stratum m in project crediting year Y

Data Unit / Parameter:	$SOC\%_{j,m,Z}$
Data unit:	Dimensionless proportion
Description:	Proportion soil organic carbon at station j in stratum m at time (year) = Z, the number of years sufficient for changes in SOC at individual sampling stations
Source of data:	Measured in project area

Data Unit / Parameter:	$BULK_{j,m,Z}$
Data unit:	g/cm^3
Description:	Bulk density in stratum m, station j, year Z

Data Unit / Parameter:	$SOILWATER\%_{j,m,Z}$
Data unit:	dimensionless
Description:	Soil water content as a% in stratum m, station j, year Z

Data Unit / Parameter:	$NDVI_{jm,z}$
Data unit:	Dimensionless fraction
Description:	Vegetation index calculated from MODIS spectral imagery (available at NOAA website)

The suitability and eligibility of monitoring equipment and procedures were considered in the desktop review prior to and post site visit and were observed and discussed in the field to confirm their appropriateness. All were found to be consistent with good standard operating practices and in accordance with the requirements of the methodology. The monitoring plan appears to adhere to the requirements of the methodology and the relevant tools it requires.

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

As described in the PD, monitoring plan is disseminated in a series of separate actions. 80% of monitoring is performed by communities and is subdivided into wildlife, vegetation, and social, with each having a separate community-based management system (CoMMs). Livestock monitoring is performed by grazing coordinators who are members of the communities they monitor, and their activities are communicated to the public in grazing committee meetings within Conservancies. Larger and broader monitoring plans, such as those involving satellite imagery and cross-Conservancy issues such as seasonal migratory movements, have been presented in annual workshops, such as occurred in May 2016 and September 2017.

Additionally, each year in September or early October, the project will hold a Conservancy-wide Project Meeting attended by Conservancy chairs, community grazing chairpersons, grazing coordinators and interested public. This meeting will be announced on the NRT website and notices will be posted in major community kiosks and markets. At the meeting a report of the previous 12 months' monitoring results will be presented. Data included will be livestock counts, leakage and distribution within the project area, any soil or vegetation or biodiversity surveys, and results of the previous Social CoMMs surveys. Following this presentation, plans for the ensuing 12 months will be discussed, with feedback from managers and the community welcomed. An Annual Report of the project, with a monitoring plan modified in response to community feedback from the Project Meeting and a summary written in Kiswahili, will be posted on the NRT website. Links to the posted report will be sent by text through the grazing management and grazing coordinator network and be communicated via email to other NGO and government stakeholders.

During the site visits meetings with stakeholders, including community members and NRT staff, confirmed that the project summary and monitoring plan details were distributed. It was found that some persons (particularly NRT and community Chiefs, had received the project summary including elements of the monitoring plan, however due to a high rate of illiteracy in the region many were unable to read it. The interviews were able to confirm that there was a reasonable level of

understanding of project elements. It was evident that the NRT communications network is well structured to reach communities and will serve as a sufficient channel to communicate the periodic monitoring results.

3.3.10 Non-Permanence Risk Analysis

The Project utilized the AFOLU Non-Permanence Risk Tool, to assess risk according to internal risk, external risk, natural risk, and mitigation measures for minimizing risk. The validation team reviewed the Non-Permanence Risk Report following VCS AFOLU Requirements and confirmed that the project adheres to the requirements set out in the VCS AFOLU Non-Permanence Risk Tool. At all levels, the validation team evaluated the rationale, appropriateness, and justifications of risk ratings chosen by the project proponent. Each risk factor was thoroughly assessed for conformance. Any identified NCR and/or CL findings related to the AFOLU Non-Permanence Risk Tool/Report are presented in Appendix A.

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

Risk Factor	Rationale & Quality	Conclusion
Internal Risks		
Project Management	No-non native species or GMO species will be used. The combined management team (including SFTF, NRT, TNC and Native Energy) includes individuals with skills necessary to undertake all project activities. Management team (primarily NRT) is located within country and project areas. Management team includes individuals with significant experience in AFOLU project design and implementation, carbon accounting and reporting (eg, individuals who have successfully managed projects through validation, verification and issuance of GHG credits) under the VCS Program or other approved GHG programs. An adaptive management plan has been provided.	A risk rating of **-4** is appropriate given the rationale as the management team has demonstrated appropriate qualifications and all statements made are substantiated.
Financial viability	Project proponents provided the validation team appropriate and verifiable documentation to prove that the project's financial resources are available and have been secured. Items presented to the validation team by project proponents give reasonable assurance that the risk rating for financial viability is appropriately set. Values were sourced from reputable sources and calculations were confirmed correct through data checks.	A review of the financial resources has been confirmed so a risk rating of **1** is appropriate.
Opportunity Cost	A comprehensive NPV analysis was provided to substantiate the most profitable alternative (industrial paper pulp plantation) is like the	The NPV analysis and supporting materials provided

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

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

	is supported by the fact that project activities are targeted to restore soil carbon to degraded soils. An overall score of 1.5 is reasonable The Validation team agrees with the projects justification for geologic events. The project area displays evidence of geological activity, particularly surface lava flows that produce extensive lava plateaus in the region.. However, these flows are not currently erupting, and the most recent activity dates back more than 100,000 years resulting in a risk score of 0. Climate change was determined to be insignificant thought the likelihood of impact was between 10-25 years. Prevention measures included adjusting livestock herd sizes and grazing rotations to account for any long-term decline in rainfall. A score of 0.5 was given.	
	Total Natural Risks	**3**
Overall Risk Rating = 16% **Non-Permanence Risk Rating = 16%**		

In summary, project proponents have accounted for risk factors in a reasonable manner and have reached an overall risk rating that encompasses all risks of non-permanence. The project has applied the Non-Permanence Risk Rating of 16% correctly. As required, risk will be reassessed and given risk scores at each verification period.

3.3.11 Optional Gold Level: Regional Climate Change Scenarios (GL1.1)

Climate is expected to become increasingly variable in the region, increasing the frequency and intensity of droughts and shrinking the length of the season in which soil moisture is available. These predictions are backed by three peer reviewed articles on expected climate change in Kenya and other, nearby grazing regions.

The local land use scenario may not change, but if rain events become more localized, as predicted, they system of grazing scouts and professional grazers is likely to aid community members in finding sufficient grazing and also reducing potential conflicts over diminishing resources.

3.3.12 Optional Gold Level: Climate Change Impacts (GL1.2)

Anticipated climate change, which may already be occurring, is expected to bring more unpredictability in rainfall events and increasing lengths of droughts. This is expected to reduce overall forage availability and potentially increase conflicts for water and forage. A similar problem will be faced by wildlife.

3.3.13 Optional Gold Level: Measures Needed and Designed for Adaptation (GL1.3)

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

Biodiversity HCVs should also benefit from increasing SOC, for the same reason.

3.4 Community

3.4.1 Descriptions of Communities at Project Start (CM1.1)

Descriptions of the communities, as summarized in table 2.1.9 of the PD, were confirmed during site visits. The people have been pastoralists for considerably longer than Kenya was a country. Though they are of many ethnic groups, their ways of life and economies are very similar. Several recent, peer-reviewed articles on the people of the region were referenced. Significant changes occurred within the last century, when movement was restricted and populations increased. The diversity in ethnicity is seen between communities and generally not within them.

3.4.2 Interactions between Communities and Community Groups (CM1.1)

Some of the ethnic groups in the project area are traditional enemies and cattle raiding is carried out between them, as a rite of passage. In spite of these long-held cultural animosities, ethnic groups work together on the grazing plan for the project area.

This was fully demonstrated during the site visits, when cattle raiding that included loss of life occurred.

3.4.3 High Conservation Values (CM1.2)

The entire project area is considered a community HCV by the project, because the people depend on all of it for grazing, and therefore for both sustenance and way of life.

In addition, there are sacred sites, like Ololokwe, which is a mountain that dominates the landscape in part of the project area. The project activities do not include a change of land use, and grazing will not threaten such a geologic feature.

The site visits made clear that livestock is the way people survive and make a living, making essentially the entire project area important to ecosystem services, livelihoods and cultural identity.

3.4.4 Without-Project Scenario: Community (CM1.3)

The without-project scenario is the continued degradation of already degraded grazing land, through year-round overgrazing. The 2015 and 2017 site visits occurred during a prolonged drought, allowing auditors to witness the state of the land, firsthand.

Most livestock was in the eastern areas of the project area, and small herds for domestic use were grazed in and around settlements. Almost no grass was to be seen. Most areas were bare soil.

The project lands, especially near settlements, was seen to be degraded from overgrazing. This was clearly caused by the type of land management practiced in the baseline (without-project) scenario.

3.4.5 Expected Community Impacts (CM2.1)

Community impacts are derived from the improvement of grazing land in the project area. The methodology and project are designed to increase SOC, which will increase the quality and productivity of the land and provide other ecosystem benefits.

The increased quality and productivity of the land can lead to improved and wealth and food availability of members of the pastoral communities of the project area. The reasoning behind this assumption is self-evident.

The risks and benefits faced by each ethnic group that was described earlier in the PDD are listed separately, though the risks and benefits are identical for each group. Since all groups share a similar lifestyle, this is expected.

Risks include a higher risk of conflict with other ethnic groups over planned migrations and separation of families due to planned migrations.Distribution of the community shares of carbon proceeds are also expected to have positive impacts, but the project will not be governing the use of these funds, so the only specifics offered are the ways the communities spent pooled conservancy funds in the past. Past community fund expenditures were heavily weighted toward education,

The expected impacts described by the project proponents are reasonable, directly stemming from the increases in SOC caused by project actvities.

3.4.6 Negative Community Impact Mitigation (CM2.2)

Reason dictates that negative community impacts are unlikely for a project which does not change the economy way of life of the area, but improves the grazing land everyone depends upon. However, several potential negative impacts are discussed. The most likely one suggested is an increase in conflict and livestock theft.

Mitigation actions are reasonable, including response teams and peace meetings.

3.4.7 Net Positive Community Well-Being (CM2.3, GL1.4)

The likelihood of net positive community well-being, as a result of the project, is high for obvious reasons.

The communities maintain the same way of life in the with-project scenario as in the without-project scenario. The only change is from continuous, year-round grazing to planned, rotational grazing. The activity is designed to increase SOC, which will increase land productivity, leading to healthier livestock and added drought resilience due to increased moisture-holding capacity of the soil.

Site visits allowed auditors to witness the condition of the land under decades of the baseline, which is also the without-project scenario. Improvements in the soil of this nature will improve the lives of the people dependent upon it.

If the project has the effect of increasing soil organic carbon, as planned, productivity and water holding capacity of the landscape will increase, and thereby increase the ability of the pastoralists to adjust to the expected increase in droughts. The soil will hold more water that would otherwise run off, which is then used by plant life to increase biomass production.

3.4.8 High Conservation Values Protected (CM2.4)

The community-related HCVs encompass the entire project area, because it is the land on which the communities graze their livestock. The project activity will increase SOC, resulting in improved grazing land and improved resilience to drought. If methodology assumptions are sound, there is no mechanism through which the project activity will damage or degrade the community-related HCVs.

3.4.9 Impacts on Other Stakeholders (CM3.1)

It is unlikely for a project of this nature to have significant offsite stakeholder impacts, though two were identified:

1. Enforcement of project boundaries.

2. Defense of rights may escalate conflicts over grass and water.

Traditionally, pastoralist have moved their livestock onto neighboring lands when forage is lacking in their own territories. Enforcement of boundaries could have negative impacts on some neighboring stakeholders.

3.4.10 Mitigation of Negative Impacts on Other Stakeholders (CM3.2)

The enforcement of project boundaries also has the effect of fewer incursions from the project area into the territories of neighboring pastoralists.

For the near-term, mitigation is focused on creating administrative response structures to deal with conflicts when they arise. NRT and local county governments joined to develop rapid response teams. Peace meetings are also employed to work out agreements on resource sharing.

Interviews during the site visit confirmed recent instances when rapid response teams and peace meetings were employed by NRT, as described in the PD.

3.4.11 Net Impacts on Other Stakeholders (CM3.3)

One of the impacts on other stakeholders is enforcement of project boundaries, which has the dual effect of keeping project livestock off the grazing lands of other stakeholders. The other is possible escalating conflicts over grass and water.

Conflicts over grass and water already occur and they occur within the project area between project participants. The rapid response teams and peace meetings have been effective and are likely to remain so. In the long run, offsite stakeholder impacts are much more likely to be positive as the management used in the project area pays dividends in higher quality grazing land. In addition, the project can prove out the concept of this kind of rotational grazing which can be employed offsite.

3.4.12 Community Monitoring Plan (CM4.1, CM4.2, GL1.4, GL2.2, GL2.3, GL2.5)

The community monitoring plan was examined by the auditors for the attributes required by CCBA. Baseline and monitoring survey questions were provided to the auditors, along with an outline of a causal model, linking project activities with ecological change and consequences for the communities. The questions are also provided in table 19 of the PDD.

The narrative of the PDD explains which questions are expected to monitor potentially underrepresented segments of the communities, and also the questions that are intended to monitor expected climate adaptation benefits.

The monitoring plan is capable of detecting changes in well-being of community members at all economic levels.

3.4.13 Monitoring Plan Dissemination (CM4.3)

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

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

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

3.4.14 Optional Gold Level: Exceptional Community Criteria (GL2.1)

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

Evidence of ownership and control of land use was provided in the forms of certificates of incorporation and Tax Authorization, and draft applications for conservancy management plans.

The conservancies that are part of the project area are part of the Kenya Wildlife Conservancies Association.

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

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

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

The restoration of grazing lands will clearly be a positive well-being benefit for all community members in pastoral communities.

3.4.16 Optional Gold Level: Community Participation Risks (GL2.3)

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

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

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

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

Marginalized groups receive project benefits in two ways. The poorest 25% of people who own livestock benefit as anyone else in the community would benefit – through increased quality of the range.

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

No negative impacts are expected, so impacts are net positive for the project area's most vulnerable community members.

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

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

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

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

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

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

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

3.4.20 Optional Gold Level: Benefits, Costs, and Risks Communication (GL2.7)

Site visit interviews indicated that community members understood the project's predicted benefits. It also appears they agreed to the project activity before being informed that there could be financial benefits through the carbon market.

Risks of the project are fairly small, considering they are not much different from the without-project scenario.

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

The governing structures regarding livestock movements and grazing are largely based on the pre-existing governing structures of the conservancies. Community members influence governance during open community grazing planning meetings and through elders, which influences the grazing committees.

Conversations with grazing coordinators, scouts and interviews with community members confirmed this governing structure.

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

The conservancies serve as the source of most project field employees involved as grazing assistants, field techs, data entry specialists, social impact monitors, etc., as observations during the site visit confirmed.

Almost all personnel, save the SFTF field staff, are employed by the conservancies or the NRT. With the exception of remote sensing tasks and remeasuring the SOC baseline in the future, the conservancies and NRT have developed the capacity to run most of the project.

3.5 Biodiversity

3.5.1 Existing Conditions (B1.1)

The PD describes five established camps from which biodiversity was sampled in the Project Zone. The Project has identified multiple High Conservation Values (HCVs) in the Project Zone, to include protected areas and threatened species. The protected areas consist of national parks and forest reserves. Threatened species are comprised of at least 10 individuals of four endangered wildlife species, including the critically endangered black rhino, and three endangered species: Grevy's zebra, beisa oryx, and reticulated giraffe. Many other vulnerable or near vulnerable species are located in the Project Zone.

The Project area is currently being degraded due to overgrazing. This negatively affects the previously mentioned biodiversity, including HCVs. The PD has identified studies supporting the assertion that planned rotational/migratory grazing and rangeland recovery will enhance the existing biodiversity. The Validation Team reviewed the studies and agrees the project activities will enhance biodiversity. Further, site visit observations and interviews confirm overgrazing actively occurs, and planned rotational grazing will slow current degradation to grasslands and savannas.

3.5.2 High Conservation Values (B1.2)

HCVs identified by the project include the following:

IUCN Category II – National Parks: Samburu, Buffalo Springs and Shaba National Reserves.

IUCN Category IV – Forest Reserves: Mukugodo and Matthews Forest Reserves

Threatened Species: wildlife species including black rhino (critically endangered); three endangered species – Grevy's zebra, beisa oryx and reticulated giraffe; significant populations of other vulnerable or near threatened species, including African elephant, gerenuk, lion, cheetah, and African wild dog.

The Validation Team confirmed the HCVs present in the Project Area and Zone via literature review, comparison of IUCN categories versus PD categories, and site visit interviews/observation. The Validation Team is assured the Project accurately described the relevant HCVs and that each is actively occurring in the Project.

3.5.3 Without-project Scenario: Biodiversity (B1.3)

The Project asserts that without the project, overgrazing will continue to lead to degradation of HCV areas in the Project Zone, further perpetuate loss of diverse species of plants and wildlife, and continue to lead to ecological biodiversity declines that could exacerbate drought and extreme

weather conditions. The Validation Team confirmed these assertions during multiple site visit interviews, observations, and review of literature.

3.5.4 Expected Biodiversity Changes (B2.1)

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

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

3.5.5 Mitigation Measures (B2.3)

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

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

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

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

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

3.5.6 Net Positive Biodiversity Impacts (B2.2, GL1.4)

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

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

The Glew article[5] states that the initial change to conservancy management (2000-2007) in the NRT lands resulted in significant improvement to habitat conditions, coinciding with improvements in range conditions.

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

3.5.7 High Conservation Values Protected (B2.4)

The PD states that the principal threats to HCV biodiversity in the project zone come from illegal hunting of elephants and rhinos, overgrazing, and the frequent use of protected areas during droughts.

Project activities increase game scout patrols, improve range for grazing, and reduce the need to use protected areas during droughts.

The PD further states that not all potential effects of the project activities are known, especially in regard to species that are not large ungulates or predators. However, a causal model is employed to show that the likely consequences to biodiversity from project activities are positive.

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

3.5.8 Species Used (B2.5)

The PD sufficiently states that no non-native or GMO species will be introduced, as project activities only involve shifting of grazing rotation. Grass for seed banks will be harvested locally. Based on site visit observations and interviews, the Validation Team is assured no known invasive species will be introduced in the Project area and that the population of any existing invasive species will not increase as a result of project activities. This will be confirmed in future verification events.

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

The Project is not attempting to utilize any non-native species in the project zone. No non-native species were observed during the site visit. This aspect can be confirmed in future verification events.

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

3.5.10 GMO Exclusion (B2.7)

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

3.5.11 Inputs Justification (B2.8)

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

3.5.12 Waste Products (B2.9)

Since the project activity is planned rotational grazing, generation of waste products will not occur. Given the nature of the Project, the Validation Team agrees with this assertion of the Project. No waste generation due to project activities was observed during the site visit. This aspect can be further confirmed in future verification events, though waste generation is likely not applicable.

3.5.13 Negative Offsite Biodiversity Impacts (B3.1) and Mitigation Measures (B3.2)

The Project references literature[6] describing potential negative offsite biodiversity impacts outside the Project Zone. Further, a table in the PD describes potential unmitigated impacts on biodiversity outside the Project Zone and compares them to net positive biodiversity benefits in the with-project scenario. The off-site impacts are summarized as land degradation due to overgrazing and relative lack of wildlife protections off-site in comparison with the project area.

If project activities exacerbated range degradation off-site or increased poaching off-site, these impacts are likely to be relatively slight, especially in comparison with the benefits of increased range quality, habitat and patrolling in the with-project scenario. The Validation Team is assured the appropriate mitigation measures the project has undertaken will resolve any potential off-site impacts. This aspect will be further confirmed in future verification events.

3.5.14 Net Offsite Biodiversity Benefits (B3.3)

As described in the indicator above, the PD includes a table in the PD describing potential unmitigated impacts on biodiversity outside the Project Zone and comparing them to net positive biodiversity benefits in the with-project scenario. Based on literature review, site visit observations and interviews, the Validation Team is assured net off-site biodiversity benefits will occur to offset any potential off-site impacts. This aspect will be further confirmed in future verification events.

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

3.5.15 Biodiversity Monitoring Plan (B4.1, B4.2, GL1.4, GL3.4)

The PD describes biodiversity monitoring at two scales:

- A project-wide assessment conducted by game scouts and grazing coordinators making daily reports on sightings of a list of carnivores, endemic and endangered species

- Focused surveys of indicator species to compare diversity in areas with different grazing management

The project-wide assessment is described as systematic, except that observations will be weighted according to "effort density," which is determined through the use of GPS recordings at fixed time intervals by scouts on patrol.

Surveys of indicator species will take place at five fixed locations every 3 years, on lands of different management types. The PD reiterates the purpose is to compare the effects of the new grazing practices but not to monitor biodiversity over a random sample of the project area.

Based on observations and interviews during the site visit, in addition to review of project documentation, the Validation Team agrees that the proposed monitoring plan for biodiversity sufficiently links monitoring variables to the Project's biodiversity objectives and to predicted activities, outcomes and impacts identified in the project's causal model related to biodiversity.

Specifically, for Gold Level Biodiversity monitoring, population trends for 3 trigger species may be increasing in the project area, based on observations by game scouts. Some additional protection exists due to the presence of more game scouts, but overall, the improvement of rangelands is assumed to be more significant in the protection and enhancement of the trigger species.

Rhinos have been reintroduced in the project area within a protected area in the Sera conservancy. This was not directly related to the project, but protection appears to be sufficiently capable of maintaining a population of rhino.

The Validation Team observed monitoring trends during the multiple site visits and is assured that the Project's monitoring efforts will continue to report on the enhancement of trigger species, to be further confirmed in future verification events.

3.5.16 Biodiversity Monitoring Plan Dissemination (B4.3)

The Validation Team noted the Project has not been communicated more recently due to high uncertainty in the carbon market and a reluctance to raise hopes about potential revenues. However, the conservancies began on 15 May 2015 with a solicitation of participation and a public comment period. This included an announcement and information about the project distributed by NRT grazing coordinators and other staff in the form of pamphlets and an announcement on the NRT website (http://nrt-kenya.org). Additionally, the front pages of each Conservancy linked to a blog site (http://nrtcarbonproject.wordpress.com) where the announcement also exists and anyone can post comments anonymously.

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

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

3.5.17 Optional Gold Level: High Biodiversity Conservation Priority Status (GL3.1)

The PD provides a detailed plan for sampling biodiversity and focuses on ungulates and other large mammals, birds, plants, grasshoppers and dung beetles (indicator species). The geographic extent and statistical appropriateness of the surveys was further confirmed during validation review. The Validation Team is assured the High Conservation Priority Status of the Project's exceptional biodiversity benefits has been captured and will be monitored and protected to the greatest extent allowable by the Project. These measures will be further confirmed in future Verification events.

3.5.18 Optional Gold Level: Trigger Species Population Trends (GL3.2, GL3.3)

The project HCVs include protected areas (like national parks and forest reserves) and a number of endangered and threatened species, including black rhinos. A biodiversity monitoring plan is provided, using project-wide assessments of key wildlife species, carried out by game scouts, as well as focused surveys in 5 camps that are carried out once every three years. Details of the focused surveys are provided. Results will be analyzed by experts in the various categories of wildlife/plantlife.

Population trends since the start of the project are discussed for the reticulated giraffe, Grevy's zebra and the Beisa Oryx. Trigger species are identified as four endangered ungulates (as classified by IUCN). Ogutu et al (2016)[7] and a Kenya Wildlife Service report are used as evidence that these species are declining outside protected areas. There exists a clear discussion of baseline and project scenarios, supported by results from the Ogutu et al. (2016) study and Wildlife CoMMs data from the PD. These sections identify 4 trigger species (black rhino, Grevy's zebra, beisa oryx and reticulated giraffe). All four species would likely decline in the without project scenario, based on a survey by Ogutu, et al. Black rhinos only exist in protected areas, due to poaching. The other three species are under pressure from habitat degradation and poaching, and have declined by 45 – 80%. The PD states – and Validation Team review and observations concur – that all four trigger species will benefit from project activities due to improvement in rangeland productivity. A figure in the PD shows that for 3 species, sightings have increased in the project area as compared to the baseline. Black rhinos are mostly limited by illegal poaching, but some were transferred to the Sera conservancy in a core area.

The Validation Team is assured that the project area contains indicators for trigger species and the project activities will lead to Gold Level trigger species population trends. These aspects will be confirmed in future verification events.

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

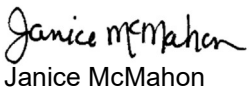
4 VALIDATION CONCLUSION

Aster Global Environmental Solutions confirms all validation activities, including objectives, scope and criteria, level of assurance, and the PD's adherence to the selected methodology (VM0032 v1.0), VCS Version 4 (and updates), and CCB Project Design Standards (Third Edition), as documented in this report are complete. ESI concludes without any qualifications or limiting conditions that the Northern Kenya Grassland Carbon Project dated 05 January 2020, v5.3 meets the requirements of the VCS and CCB to a reasonable level of assurance. The project is likely to achieve the estimated climate, community, and biodiversity benefits, including Exceptional Biodiversity Benefits as described in the PD dated 05 January 2020, v5.3.

CCB **CRITERIA CHECKLIST:**

GENERAL SECTION	**CONFORMANCE**
G1. Project Goals, Design & Long-Term Viability (Required)	YES _X_ NO __ N/A__
G2.Without-Project Land Use Scenario & Additionality (Required)	YES _X_ NO __ N/A__
G3. Stakeholder Engagement (Required)	YES _X_ NO __ N/A__
G4. Management Capacity (Required)	YES _X_ NO __ N/A__
G5. Legal Status and Property Rights (Required)	YES _X_ NO __ N/A__
CLIMATE SECTION	
CL1. Without-Project Climate Scenario (Required)	YES _X_ NO __ N/A__
CL2. Net Positive Climate Impacts (Required)	YES _X_ NO __ N/A__
CL3. Offsite Climate Impacts (Required)	YES _X_ NO __ N/A__
CL4. Climate Impact Monitoring (Required)	YES _X_ NO __ N/A__
CL5. Climate Impact Adaptation (Optional)	YES _X_ NO __ N/A__
COMMUNITY SECTION	
CM1. Without-Project Scenario for Communities (Required)	YES _X_ NO __ N/A__
CM2. Net Positive Community Impacts (Required)	YES _X_ NO __ N/A__
CM3. Offsite Stakeholder Impacts (Required)	YES _X_ NO __ N/A__
CM4. Community Impact Monitoring (Required)	YES _X_ NO __ N/A__
GL5. Exceptional Community Benefits (Optional)	YES _X_ NO __ N/A__
BIODIVERSITY SECTION	
B1. Without-Project Biodiversity Scenario (Required)	YES _X_ NO __ N/A__
B2. Net Positive Biodiversity Impacts (Required)	YES _X_ NO __ N/A__
B3. Offsite Biodiversity Impacts (Required)	YES _X_ NO __ N/A__
B4. Biodiversity Impact Monitoring (Required)	YES _X_ NO __ N/A__

GL3. Exceptional Biodiversity Benefits (Optional) YES _X_ NO __ N/A__

Report Submitted to:	Verra 1730 Rhode Island Ave. NW, Suite 803, Washington, D.C. 20036 Northern Rangelands Trust 6125 Ketch Drive, Cicero, NY 13039
Report Submitted by:	Aster Global Environmental Solutions 3800 Clermont St. NW, North Lawrence, Ohio 44666
Aster Global Lead Validator, Name and Signature	 Shawn McMahon Lead Validator
Aster Global President Name and Signature	 Janice McMahon President
Date:	07 April 2020

CLS/SMM/RS/VO19026.00/ 090_00_SFTF_CCB_VCS_Validation_Report_Final_v2.doc

K pf :04/07/20

APPENDIX A: VERIFIED CARBON STANDARD FINDINGS

Item Number	1
VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	1.1 VERSION
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	This document will be updated from time-to-time and readers ***shall*** ensure that they are using the most current version of the document. Where external documents are referenced, such as the IPCC 2006 Guidelines for National GHG Inventories, and such documents are updated, the most recent version of the document shall be used.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NKCP VCS CCB Project Description v2.1.2.pdf - Section 9 References
Findings	Both the VCS (2012) VCS Standard: VCS Version 3.3, and AFOLU 3.3 are cited in section 9 of the PD (these are both out of date). There may be other documents that are not current as well, please ensure all external documents referenced are up to date.
NCR/CL/OFI	CL: Please ensure the most current version of the document VCS document is referenced in the PD. Where external documents are referenced, such as the IPCC 2006 Guidelines for National GHG Inventories, and such documents are updated, the most recent version of the document shall be used.
Response from Project Proponent	All references to VCS and IPCC documents have been updated to the most recent version.
Findings	VCS documents , including AFOLU requirements and the standard, still have the wrong version numbers in section 9 (references)
NCR/CL/OFI	CL: See findings and insert correct version numbers for VCS documents.
Response from Project Proponent	
Findings	No response was received for this item. Reference to the VCS Standard was found to be reported correctly as version 3.7 in the PD. However, reference to the AFOLU Requirements version (reference 52) is incorrect.
NCR/CL/OFI	CL: Please ensure all references to VCS documents in all project reporting documentation report the correct versions.
Response from Project Proponent	This has been corrected throughout the PD and MR. We refer to VCS Standards 3.7, AFOLU Requirements 3.6, and CCBA v 3.
Findings	The verification team confirmed that the correct version has been reported throughout the monitoring report and PD submitted on 06 March 2019. The item is addressed.
Item Number	2

VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	2.3 TIMING OF CREDITING
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	3) VCUs may be issued only for GHG emissions avoided over a ten year period, even if such GHG emissions are likely to have continued over a longer period of time under the baseline scenario. For example, a composting project that diverts organic waste from a landfill site would be eligible for crediting (in relation to a specific amount of composted organic waste) for the GHG emissions that would have occurred at the landfill site over a ten year period, and any emissions that would have occurred beyond the ten year period (in relation to the specific amount of composted organic waste) are not eligible. Note that in this particular example the ten year rule applies to the specific amount of composted organic waste and the usual rules on duration of the project and project crediting period still apply.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NKCP VCS CCB Project Description v1.0 draft 4.docx (Section 5.6), MIR Section 1.7
Findings	The PD and sampling plan are not clear what the actual reporting period are. (See PD Section 5.6). The start date: from December 10, 2012 to December 9, 2042, and Sampling plan Validation/Verification Scope. The sampling plan states, "*Time Period (start date, crediting period, verification period),* are *Start date and reporting start: 10 December 2012* ".
NCR/CL/OFI	CL: Please clarify in the PD and all supporting calculation files the actual reporting period for this monitoring report.
Response from Project Proponent	The reporting period is staed in section 1.7 of the Monitoring Report
Findings	The reporting/monitoring period was confirmed in Section 1.7 of the MIR. Monitoring periods are not reported in the PD, the crediting period is appropriately reported in the PD and MIR. The item is addressed.
Item Number	3
VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	3.1 GENERAL REQUIREMENTS
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	3.1.3 Projects shall apply methodologies eligible under the VCS Program. Methodologies shall be applied in full, including the full application of any tools or modules referred to by a methodology, noting the exception set out in Section 3.14.1. The list of

	methodologies and their validity periods is available on the VCS website.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NKCP VCS CCB Project Description v2.1.2.pdf
Findings	The project is applying the approved VCS Methodology VM00032 Version 3.4, Adoption of Sustainable Grassland Management through Adjustment of Fire and Grazing. **and** VCS ALM – Sustainable Grassland Management methodology (VCS-Approved VCS Methodology Module VMD0040. Further, the PD (section 4.1 or otherwise) does not appear to list the full name of the methodology (VDM# and version), including any tools or modules referred to by a methodology.
NCR/CL/OFI	NCR: Please list in the PD the full name of the methodology (VDM# and version) in section 4.1, and any tools or modules referred to by a methodology.
Response from Project Proponent	This is corrected in both the PD and MR. The project does not use any other methodology as it is using the penalty method in VM0032 for calculating leakage.
Findings	The full name of the methodology is now listed in the PD Section 4.1. The item is addressed.
Item Number	4
VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	3.1 GENERAL REQUIREMENTS
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	3.1.4 Where projects apply methodologies that permit the project proponent its own choice of model (see VCS document Program Definitions for definition of model), such model shall meet with the requirements set out in Section 4.1.6(2)-(6) and it shall be demonstrated at validation that the model is appropriate to the project circumstances (ie, use of the model will lead to an appropriate quantification of GHG emission reductions or removals).
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 4.5.4 of the PD; Page 33; "4.5.4 Baseline Soil Organic Carbon" section

Findings	The project is using the following for a Baseline Soil Organic Carbon Model: The project will use the SNAP model of soil carbon dynamics, a carbon mass balance model developed from the grassland savanna – grazing system in Serengeti National Park The SNAP model: Ritchie ME (2014) Plant compensation to grazing and soil carbon dynamics in a tropical grassland PeerJ 2: e233. PeerJ is an open access peer-reviewed scientific mega journal covering research in the biological and medical sciences. The carbon mass balance model developed from the grassland savanna – grazing system in Serengeti National Park, is published by McNaughton SJ (1985) Ecology of a grazing ecosystem: the Serengeti. Ecological Monographs 55 259-294.
NCR/CL/OFI	NCR: Section 4.1.6, #1 of the VCS standard states, "Models shall be publicly available, though not necessarily free of charge, from a reputable and recognized source (eg, the model developer's website, IPCC or government agency)." Please show that the SNAP model is publicly available.
Response from Project Proponent	The SNAP model is published ina n open-access journal https://peerj.com/articles/233/
Findings	Verifiers examined the link to the journal article "Ritchie, M.E., Plant compensation to grazing and soil carbon dynamics in a tropical grassland PeerJ, 2014. 2: p. e233" which was peer-reviewed on an online platform and describes the SNAP model. The SNAP model was approved for use in VM0032 as part of the double methodology validation process. No further action is needed. The item is addressed.
Item Number	5
VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	3.1 GENERAL REQUIREMENTS
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	3.1.5 Where projects apply methodologies that permit the project proponent its own choice of third party default factor or standard to ascertain GHG emission data and any supporting data for establishing baseline scenarios and demonstrating additionality, such default factor or standard shall meet with the requirements set out in Section 4.1.7(1).
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 8.2 and 8.3 of the PD

Findings	Sections 8.2 and 8.3 of the PD lists all of the data and parameters available at monitoring and validation. The source of these parameters are generally measured on the project site or calculated using Modis data, there appear to be no factors that were established by the project proponent. Section 8.2 does not list the Methodology number, this section states,"*Per the VM ????? methodology, the following* ".
NCR/CL/OFI	CL: Please insert methodology number is first sentence in section 8.2 of the methodology.
Response from Project Proponent	Methodology number is included in that section and throughout the PD
Findings	The methodology number appears in full, throughout both the PD and the monitoring report (NKCP VCS CCB Project Description v2.0 and NKCP VCS CCB Monitoring Impl Report v2.0. Item closed.
Item Number	6
VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	3.7 PROJECT START DATE
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	3.7.1 The project start date is the date on which the project began generating GHG emission reductions or removals (see VCS document AFOLU Requirements for further specification for AFOLU projects). The rules and requirements on project start date, as well as validation and verification dates, are set out in the sections below. For projects registered under both the VCS Program and an approved GHG program, further specification with respect to the validation deadline is set out in Sections 3.11.8 and 3.11.9.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD Section 1.6
Findings	Section 1.6 of the PD states, "The project Start Date is December 10, 2012 (Date of TNC/NRT charter)", however a copy of the TNC/NRT charter was not provided with project documentation to the Validation/Verification team
NCR/CL/OFI	CL: Please provide a copy of the TNC/NRT charter to confirm project Start Date.
Response from Project Proponent	The Charter is now included in the Folder Key Admin Documants
Findings	A copy of the Northern Rangelands Trust and The Nature Conservancy "Northern Kenya Carbon Project Charter" was provided in response to this finding. Please see related finding under AFOLU Section 3.2. The finding here is closed.
Item Number	7

VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	3.11 OWNERSHIP AND OTHER PROGRAMS
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	3.11.1 The project description shall be accompanied by documentary evidence establishing conclusively one or more of the following rights of use (see VCS document Program Definitions for definition of right of use) accorded to the project proponent(s): 1) A right of use arising or granted under statute, regulation or decree by a competent authority. 2) A right of use arising under law. 3) A right of use arising by virtue of a statutory, property or contractual right in the plant, equipment or process that generates GHG emission reductions and/or removals (where such right includes the right of use of such reductions or removals and the project proponent has not been divested of such right of use). 4) A right of use arising by virtue of a statutory, property or contractual right in the land, vegetation or conservational or management process that generates GHG emission reductions and/or removals (where such right includes the right of use of such reductions or removals and the project proponent has not been divested of such right of use). 5) An enforceable and irrevocable agreement with the holder of the statutory, property or contractual right in the plant, equipment or process that generates GHG emission reductions and/or removals which vests the right of use in the project proponent. 6) An enforceable and irrevocable agreement with the holder of the statutory, property or contractual right in the land, vegetation or conservational or management process that generates GHG emission reductions or removals which vests the right of use in the project proponent. 7) A right of use arising from the implementation1 or enforcement of laws, statutes or regulatory frameworks that require activities be undertaken or incentivize activities that generate GHG emission reductions or removals.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD Section 3.2

Findings	Section 3.2 of the PD discusses right of use, however this section appears incomplete and does not clearly state which right of use is claimed. Further, documentary evidence of this right was not provided with project documentation. It is assumed by the statement in section 3.2 that the project is claiming right of use through # 1: A right of use arising or granted under statute, regulation or decree by a competent authority. Section 3.2 states that, "*Rights to benefit from soil conservation as a component of wildlife conservation are conferred by the right to register lands as Conservancies by the Kenya Wildlife Conservation and Management Act of 2013.* *Rights to grazing and grazing resources, including soil and water are conferred by*".
NCR/CL/OFI	CL: Please complete section 3.2 of the PD, clearly stating which right of use is claimed by the project, and also please provide clear documentary evidence establishing this right.
Response from Project Proponent	Rights of use are now documented through the Kenya Community Lands Bill of 2016 and The Kenya Wildlife Act of 2014. In combination, these two laws provide pastoralists the right to reside and graze cattle in their Conservancies even on former national Trust lands. Furthermore they have the right to register as Conservancies for 99 years with the Kenya Wildlife Service. AS Conservancies they have the right to earn money from conservation activities, which would include soil carbon storage.
Findings	Section 3.2 of the PD now describes in detail the two laws conferring "Right-of-Use" for participants in the project through the establishment of "Conservancies." The Kenya Wildlife Conservation and Management Act of 2013 and Community Lands Bill of 2016 both establish right of use in support of activities which in turn support the carbon project. The item is addressed.
Item Number	8
VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	3.16 MONITORING
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	3.16.2 Quality management procedures to manage data and information shall be applied and established. Where applicable, procedures to account for uncertainty in data and parameters shall be applied in accordance with the requirements set out in the methodology.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD general

Findings	Quality management procedures to not appear to have been established in the PD, a general description of data storage and error checking are included. These do not include a description of handling internal auditing and correcting non-conformities.
NCR/CL/OFI	NCR: Please include applied and established quality management procedures to manage data and information (i.e. what is the process for correcting non-conformities). Where applicable, procedures to account for uncertainty in data and parameters shall also be applied in accordance with the requirements set out in the methodology.
Response from Project Proponent	Revised section 8.1.3 of the PD addresses this issue
Findings	Section 8.1.3 of the Monitoring Plan in the PD was confirmed to contain language to satisfy this requirement. The item is addressed.
Item Number	9
VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	3.16 MONITORING
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	3.16.5 Where measurement and monitoring equipment is used, the project proponent shall ensure the equipment is calibrated according to the equipment's specifications and/or relevant national or international standards.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD Section 8
Findings	The monitoring plan does not describe what equipment is used for field data collection or how it should be calibrated, especially of soils and vegetation, and analysis of satellite images.
NCR/CL/OFI	NCR: Please add sufficient detail in the monitoring plan to describe all data collection equipment
Response from Project Proponent	These details were added to section 8.1.2 of the PD
Findings	Section 8.1.2 of the Monitoring Plan in the PD was confirmed to contain language to satisfy this requirement. The item is addressed.
Item Number	10
VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	3.16 MONITORING

VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	3.16.6 The monitoring report describes all the data and information related to the monitoring of GHG emission reductions or removals. The project proponent shall use the VCS Monitoring Report Template and adhere to all instructional text within the template.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Monitoring Report
Findings	A joint VCS/CCB Monitoring Report (Version 3)was supplied to cover the first verification period.
NCR/CL/OFI	
Response from Project Proponent	
Findings	Due to the length of verification review (concurrent with validation) for this project it is no longer using the most current VCS+CCB PD template (CCB_VCS_Monitoring_Report_Template_CCBv3.0 _ VCSv3.4-2017-06-21.doc).
NCR/CL/OFI	CL: Please update to the most current VCS+CCB template for the MR as noted in the finding and to meet this requirement.
Response from Project Proponent	The VCS provided clearance to use the previous template (see email from Andrew Beauchamp)
Findings	Email correspondence from VCS (Andrew Beauchamp sent 28 February 2019) was reviewed and the feedback states that an older VCS template is permitted to be used by the project (VCS noted "the project is not required to update the project documents to the latest versions of the templates and can continue to use the versions of the templates currently being applied"). However, it appears the proponent adjusted headers and footers of the older VCS+CCB template in an effort to align with the newer template. Other elements of the older VCS+CCB template were not checked but may not follow the template properly. The verification team understands that the VCS+CCB monitoring report template is to be used as-is.
NCR/CL/OFI	CL: Please ensure all elements of the VCS+CCB template chosen are formatted and used properly as noted in the finding.
Response from Project Proponent	We received confirmation via email from A Beauchamp at the VCS that the summary table of unque project features at the beginning of the document is sufficient to update document to the CCB 3 VCS 3.3 standards while using CCB third edition VCS 3 template. Headers now match the CCB third edition VCS 3 template. Subheadings conform to older template.
Findings	Verra approval from Andrew Beauchamp is sufficient to close this finding. The item is addressed.
Item Number	11

VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	3.16 MONITORING
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	3.16.8 Where a monitoring report and associated verification report divide a verification period into vintages, separate VCU issuance records in accordance with vintage periods may be issued, as set out in VCS document Registration and Issuance Process.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Monitoring Report Section 5.6, and section 1.7
Findings	It is not clear what the actual monitoring period being reported is in the Monitoring Report. Section 5.6 shows GHG emissions reductions over the entire project crediting period (30 years), however the emissions reductions being reported over this verification/monitoring period is not clear
NCR/CL/OFI	CL: Please clearly state in the monitoring report the actual monitoring period being reported, and also summarize any ex-ante emissions reductions over this period.
Response from Project Proponent	Monitoring Report in Progress
Findings	Table 10 of the MR contains the estimated emission reductions. This requirement is met as emission reductions are itemized by year. Please see VM0032 portion of the review for additional details. The item is addressed.
Item Number	12
VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	3.17 RECORDS AND INFORMATION
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	3.17.1 The project proponent shall ensure that all documents and records are kept in a secure and retrievable manner for at least two years after the end of the project crediting period.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD Section 8.1.2
Findings	Section 8.1.2 of the PD discusses methods for generating, recording, storing, aggregating, collating and reporting data on monitored parameters, however there is no direct mention of ensuring that all documents and records are kept in a secure and retrievable manner for at least two years after the end of the project crediting period.

NCR/CL/OFI	CL: Please clarify in the PD document that all documents and records are kept in a secure and retrievable manner for at least two years after the end of the project crediting period.
Response from Project Proponent	This is addressed specifically at the end of section 8.1.2 of the PD
Findings	Section 8.1.2 of the Monitoring Plan in the PD was confirmed to contain language to satisfy this requirement. The item is addressed.
Item Number	13
VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	3.18 PROJECT DESCRIPTION
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	3.18.1 The project description describes the project's GHG emission reduction or removal activities. The project proponent shall use the VCS Project Description Template (or approved GHG program project description template where the project is requesting registration under an approved GHG program) and adhere to all instructional text within the template.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD
Findings	The Project is utilizing the most current version of the combined CCB/VCS PD template (Current Version: v3.0 Issued: 26 November 2012)
NCR/CL/OFI	
Response from Project Proponent	
Findings	Due to the length of validation review for this project it is no longer using the most current VCS+CCB PD template (CCB_VCS_Project_Description_Template_CCBv3.0_VCSv3.3.doc).
NCR/CL/OFI	CL: Please update to the most current VCS+CCB template for the PD as noted in the finding and to meet this requirement.
Response from Project Proponent	The VCS provided clearance to use the previous template (see email from Andrew Beauchamp)
Findings	Email correspondence from VCS (Andrew Beauchamp sent 28 February 2019) was reviewed and the feedback states that an older VCS template is permitted to be used by the project (VCS noted "the project is not required to update the project documents to the latest versions of the templates and can continue to use the versions of the templates currently being applied"). However, it appears the proponent adjusted headers and footers of the older VCS+CCB template in an effort to align with the newer template. Other elements of the older VCS+CCB template were not checked but may not follow the template properly. The verification team understands that the VCS+CCB monitoring report template is to be used as-is.

NCR/CL/OFI	CL: Please ensure all elements of the VCS+CCB template chosen are formatted and used properly as noted in the finding.
Response from Project Proponent	We received confirmation via email from A Beauchamp at the VCS that the summary table of unque project features at the beginning of the document is sufficient to update document to the CCB 3 VCS 3.3 standards while using CCB third edition VCS 3 template. Headers now match the CCB third edition VCS 3 template. Subheadings conform to older template.
Findings	Verra approval from Andrew Beauchamp is sufficient to close this finding. The item is addressed.
Item Number	14
VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	3.2 PROJECT START DATE
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	3.2.1 As set out in the VCS Standard, the project start date of an AFOLU project shall be the date on which activities that lead to the generation of GHG emission reductions or removals are implemented. Such activities may include preparing land for seeding, planting, changing agricultural or forestry practices, rewetting, restoring hydrological functions, or implementing management or protection plans.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 1.6 of the PDD and MR.
Findings	The project start date is December 10, 2012, based on the date of the TNC/NRT charter. AFOLU requirements state that the start date is the date activities that lead to GHG emissions reductions or removals begin. Please address
NCR/CL/OFI	NCR: Please see the finding for specifics.
Response from Project Proponent	The initial Conservancy-wide grazing plans (not just for the Core areas) were first implenented in mid-November 2012 on five Conservancies. Prior to that, project activity-type grazing was employed only on small 100 0 ha pilot areas in Buffer zones in two Conservancies, having a negligible effect on soil carbon removals.
Findings	Section 1.6 of the PD , dated 12 April 2017 still states that the start date is December 10, 2012, based on the date of the TNC/NRT charter.
NCR/CL/OFI	NCR: Include the required justification for the start date of the project in the PD.
Response from Project Proponent	This is now clarified in the PD, as the total area of the Conservancies is differentiated from the area of black, sandy loam, and clay loam soils within them
Findings	The PD v2.1.2 was found to contain the start date justification in Section 1.6, "Date of TNC/NRT charter." However, following the most current VCS+CCB PD template

	(CCB_VCS_Project_Description_Template_CCBv3.0_VCSv3.3.doc) justification for the start date is required to be reported.
NCR/CL/OFI	CL: Please include the required justification for the start date of the project in the PD.
Response from Project Proponent	A start date justification in section 1.6 of the PD that was satisfactory to the VCS before posting to the APX site is now provided. From Iman Stenson, Junior Program Officer, 2/7/2019 Please address the findings below and send the updated documentation to me for review. · Section 1.6 Start date: o Please include a more robust justification for the project start date. · Template o Please ensure that the format of the template is kept intact and accurate. § Please include the projects unique benefits in the table provided in section 1.1. § Please adjust the document spacing § Please include the correct template version in the page footers From ME Ritchie, 2/12/2019 Thanks for your comments on the PD. Please find attached the revised PD. All of your requests have been met. Let me know if you have further questions. From Iman Stenson, 2/14/2019 Please submit the documents to APX to upload to the project record.
Findings	The revised PD, submitted 06 March 2019, was reviewed in response to this finding. Section 1.6 now includes the required justification for the start date as specified in the VCS+CCB PD template. The item is addressed.
Item Number	15
VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	3.4 PROJECT LOCATION
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	4) Total size of the project area.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 1.3 of the PDD and MR.

Findings	Total size of the project area is currently unclear, Table 1 of the PD reports 2,015,790 ha which may actually be the project zone (i.e. including ha not a part of carbon accounting) and includes itemized Conservancy areas. In the VM0032 tab of this workbook, a shapefile is requested for stratum hectares.
NCR/CL/OFI	CL: Please provide the shapefile used to estimate the total size of the project area or zone according to Conservancy.
Response from Project Proponent	This is now clarified in the PD, as the total area of the Conservancies is differentiated from the area of black, sandy loam, and clay loam soils within them Location details are in Table 1, as well as the .kml and shapefiles of the Conservancy boundaries (response recevied from Mark 2017-04-21 "090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx"). Location details are in Table 1, as well as the .kml and shapefiles of the Conservancy boundaries. (response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").
Findings	Verifiers reviewed strata polygons which were provided in response to the finding including "NRT BND LAT LON.shp" and "NRT carbon project Conservancy boundaries.kml." Verifiers noted that hectares from these sources (determined from Google Earth measurements or calculate geometry in ArcMap) did not agree with hectares reported in PD Table 1 for total area. Please see finding under VM0032 parameter - PAm,t for proper calculation of hectares used in reporting and accounting. PD Table 1 has now more clearly differentiated Conservancy area from participating project area. Verifiers note that this finding received 2 responses, April of 2017 and February of 2018.
NCR/CL/OFI	CL: Please clarify the specific source of hectares for reporting in PD Table 1 including fields Total Area and Participating Project Area. As needed please correctly report hectares in Table 1 of the PD and elswhere in project documentation to align with geospatial data provided.
Response from Project Proponent	Proper geospatial analysis of Conservancy polygons and strat have been conducted, including snapping of polygon borders, topological correction, and correct area calculation. Accordingly, .kml files of stratum polygons and Conservancy boundaries are provided and of the project zone boundary are provided in https://www.dropbox.com/home/NRT%20polygons.

Findings	The verification team reviewed revised documentation submitted in response to the finding. Table 1 project area hectares were confirmed correct when compared against the stratum shapefile (NRTConservancyStrataFinal2017-Soka.shp). This finding has been closed following VM0032 Section 9.2.
Item Number	16
VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	3.4 PROJECT LOCATION
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	Where the project area is comprised of multiple polygons (parcels), the project location details of each polygon/parcel shall be included in the project description.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD and MR
Findings	Auditors noted that no location details of individual conservancies is included following this requirement in the PD, but hectares are reported.
NCR/CL/OFI	NCR: Please describe location details for each Conservancy in the PD as required.
Response from Project Proponent	Location details are in Table 1, as well as the .kml and shapefiles of the Conservancy boundaries
Findings	Table 1 in the PD, dated 12 April 2017, provides the conservancy name, population, area, participating project area, ownership information and ethnic group information. The figure preceding the table is a map, showing the conservancies. No further action is needed. The item is addressed.
Item Number	17
VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	3.4 PROJECT LOCATION
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	b) The monitoring plan shall be designed such that it is flexible enough to deal with changes in the size of the project.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD and MR

Findings	The project size is already pushing the maximum allowable size (less than 5% of Kenya's available grazing land), so it is unlikely it can be increased. There is no discussion regarding conservancies pulling out of the project and the way that would effect monitoring and the project itself.
NCR/CL/OFI	NCR - Please address how monitoring and the project itself would be effected by a change in the project area.
Response from Project Proponent	This is addressed in item (6) of section 4.2 of the methodology.
Findings	Section 4.2 of the PD, dated 12 April 2017, does not address this item. 2 May 2017
NCR/CL/OFI	NCR: See original findings and NCR. Please address how the project and project monitoring would be affected by a change in the project area.
Response from Project Proponent	The project area might change size if certain Conservancies are unable to meet the technical requirements of the Methodology with any consistency. Monitoring is done on a Conservancy basis by members of that Conservancy, so monitoring would continue as normal for remaining Conservancies. Loss of certain Conservancies might reduce dry season grazing areas that are on the project area, but use of such dry season areas would either count as leakage, or migration patterns could be adjusted to stay within the project area. This contringency is now stated in the PD at the bottom of page 89 in section 8.1.1.
Findings	Verifiers reviewed the revised PD v2.1 (submitted 2/21/2018) where a section entitled "Changes to the Project Area" was found in Section 8.1.1. The contingency for failure to meet rotational requirements is explained as dropping conservancies from the project area and accounting for leakage, or "migration pattern adjustments". As VM0032 does not appear to consider project area size changes and AFOLU requirements are general, the additional language in the PD is sufficient. It is expected that future verifications will revisit whether monitoring at individual conservancies is carried out following all requirements and the project's monitoring plan. The item should be revisited at future verifications as a FAR because control of the project area by the proponent depends on the 80% criteria above and VCS Standard Section 3.11.1.
Item Number	18
VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	4.5 BASELINE AND PROJECT EMISSIONS/REMOVALS
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	4.5.8 Procedures to measure soil carbon stocks shall be based on established and reliable sampling methods, with sufficient sampling density to determine statistically significant changes at a 95 percent confidence level. Uncertainty related to sampling shall be addressed as set out in the VCS Standard.

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 4.5.4.3 of the PDD and MR, site visit.
Findings	The site visit revealed sampling methods for bulk density were not established nor reliable. Sampling density does not appear to be designed to characterize the soils throughout the project area.
NCR/CL/OFI	NCR: Please provide and carry out a statistically valid soil sampling plan and use soil sampling techniques acceptable to the discipline.
Response from Project Proponent	This is addressed in section 4.5.1 of the PD. A cluster analysis was used to confirm soil class strata, and a minimum sample size of soil sampling stations was determined for the Modeled Approach, which yielded 226 stations. Sampling station locations were randomized within Core and Buffer (Protected) Areas to ensure a large range of SOC for the SNAP model to predict and then an additional sampling stations were randomized across the project area. Finally a few additiona stations were added at random to black and clay loam strat to ensure proportional representation of those strata.Soil bulk density was re-measured at all prior sampling stations and measured properly at new stations using a tool invented to slide a surface underneath cores to prevent soil from leaking out the bottom of the core.
Findings	Description of bulk density analysis is confusing. In section 4.5.3, BD samples are taken to a depth of 20 cm. In section 8.1.2, the BD samples are said to be taken to a depth of 10 cm. The method used is legitimate, when done correctly.
NCR/CL/OFI	NCR: Please address discrepancies between sampling depths within project documentation.
Response from Project Proponent	The description of measuring bulk density was clarified and the correct core volume 405.366 cm3 was used in the "Measurements" tab of NRT Soil Carbon Data and Calculations v4.xls
Findings	The audit team confirmed that the correct core volume was used in calculations (405.366 cm^3). Reporting throughout the PD was confirmed to consistently describe a depth of 20 cm. The item is addressed
Item Number	19
VCS Standard VCS Version 4 Requirements Document 19 September 2019, v4 (Section)	4.5 BASELINE AND PROJECT EMISSIONS/REMOVALS
VCS Standard VCS Version 4 Requirements Document 19 June 2019, v4 (Description)	4.5.9 Procedures to estimate soil carbon stock shall use soil carbon stock change factors that are based on measurements of soil carbon stocks to the full depth of affected soil layers (usually 30 cm), accounting for differences in bulk density as well as organic carbon concentrations.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 4.5.4.3 of the PDD and MR, site visit.

Findings	A 20 cm depth was chosen by the project proponent, without explanation.
NCR/CL/OFI	NCR: Please explain why the 20 cm depth was chosen.
Response from Project Proponent	This now more fully justified in the PD section 4.5.4.3.
Findings	Section 4.5.4.3 of the PD, dated 12 April 2017, does not include a discussion of the reason the 20 cm depth was chosen. In addition, the PD describes a coring device 5 cm in diameter and 20 cm long, (volume = 392.7 cm3) but the spreadsheet uses a volume of 202.683 cm3.
NCR/CL/OFI	NCR:Please include a discussion regarding the reason 20 cm depth was chosen. Please clear up the reported volume of the core that was used.
Response from Project Proponent	The correct volume of the core, which was 20 cm in length , is 400.356 cm3. This is used in the calculation of bulk densities and thus all reported carbon densities
Findings	The previous finding requested justification for a 20 cm sampling depth, this was not included in the response from the proponent. This portion of the finding is re-issued. The volume discrepancies have been resolved.
NCR/CL/OFI	CL: Please describe and justify use of a 20 cm sampling depth in response to the finding as well as in reporting documentation.
Response from Project Proponent	Justification for sampling to a depth of 20 cm is now in sections 4.5.4.3 of the PD and 4.5.4.4 of the MR. The text states: While many standard soil carbon models model dynamics to 30 cm depth, we used a standard 20 cm depth because i) many soils were rocky and not easily sampled below 20 cm, ii) a standard 20 cm would avoid errors in core depth measurements by inexperienced field crews, and iii) the SNAP model is adaptable to any depth.
Findings	Section 4.5.4.3 of the PD, version 2.1.4, does not include the text described, but it was found in section 4.5.3.4. The 20 cm depth was chosen largely due to the difficulty of sampling to greater depths, due to the rocky nature of many of the soils. Item closed.
Item Number	20
VM0032 Version 1 - 16 July 2015 (Section)	1. Sources
VM0032 Version 1 - 16 July 2015 (Description)	CDM A/R methodological tool Calculation of the number of sample plots for measurements within A/R CDM project activities
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NKCP VCS CCB Project Description
Findings	This required tool was not mentioned in the PD.
NCR/CL/OFI	CL: Please include mention of this required tool in the PD

Response from Project Proponent	This tool is not required for projects using a Modeled Approach - see page 22 in the methdoology. The appropriate method in VM0032, a sample size calculator for regression, was used and details are provided in section 4.5.1
Findings	Section 8.1.2.1 is not preceded by text explaining this tool is only to be used for the measured approach. Only in the next subsection (8.1.2.2) does any divergence between procedures for the measured vs. modeled approach appear. However, under 8.1.2.2 Modeled Approach, the methodology states the sample size must be determined with an online calculator or a power analysis in any standard statistical program. This appears to be an error in the way the methodology was written.
NCR/CL/OFI	NCR - see findings. Pending comment from VCS.
Response from Project Proponent	This tool is not required for projects using a Modeled Approach - see page 22 in the methdoology. The appropriate method in VM0032, a sample size calculator for regression, was used and details are provided in section 4.5.1.
Findings	Upon rereading section 8.1.2.2, the use of CDM A/R methodological tool Calculation of the number of sample plots for measurements within A/R CDM project activities is not required for the modeled approach. Item closed.
Item Number	21
VM0032 Version 1 - 16 July 2015 (Section)	1. Sources
VM0032 Version 1 - 16 July 2015 (Description)	VMD0016 Methods for stratification of the project area (X-STR)
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NKCP VCS CCB Project Description
Findings	Auditors were unable to determine if stratification and sampling methods for the baseline and project cases incorporated use of this tool. Section 4.1 of the PD has omitted mention of this tool and the latest version 1.1 9 March 2015. If this tool was employed by the project, then it must be listed following the VCS template "VCS+CCB+Project+Description+Template,+v3.0.docx."
NCR/CL/OFI	CL: Please address the findings and confirm whether this tool was used. As needed, please include mention of this required tool in the PD.
Response from Project Proponent	Methods for stratification, including k-means cluster analysis and proportional allocation among strata are discussed in detail in section 4.5.1

Findings	The means for stratification described in section 4.5.1 of the PDD is reasonable and is in line with the modeled approach in section 8.1.2.2 of the methodology. It appears that the current version of VMD0016 is of little benefit to a user of this methodology. X-STR was not applied for this project and VM0032 does not explicitly state it must be used. The item is addressed.
NCR/CL/OFI	
Response from Project Proponent	Methods for stratification, including k-means cluster analysis and proportional allocation among strata are discussed in detail in section 4.5.1.
Findings	This response was added again, without regard to the clearing of the item, resulting in it being checked again. The item is addressed.
Item Number	22
VM0032 Version 1 - 16 July 2015 (Section)	1. Sources
VM0032 Version 1 - 16 July 2015 (Description)	VMD0040 Leakage from Displacement of Grazing Activities
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NKCP VCS CCB Project Description
Findings	Section 4.1 of the PD has omitted mention of this tool. All tools employed by the project should be listed following the VCS template "VCS+CCB+Project+Description+Template,+v3.0.docx."
NCR/CL/OFI	
Response from Project Proponent	
Findings	The PD Section 4.1 omits mention of this required tool following VM0032 Section 8.3.1.1 where the project has chosen the monitored approach, "In this approach, potential vegetation impacts and baseline SOC in these outside areas must be measured/monitored, following VMD0040 Leakage from Displacement of Grazing Activities."
NCR/CL/OFI	CL: Please address the findings and report this required tool in the PD Section 4.1.
Response from Project Proponent	The tool VMD0040 Leakage from Displacement of Grazing Activities is now mentioned in the PD. It is noted that the tool is not required because the project is taking the penalty approach to calculating leakage.
Findings	The proponent is correct as this tool is no longer applicable since the project has adopted the penalty approach following Section 8.3.1.1 of VM0032. The item is addressed.
Item Number	23

VM0032 Version 1 - 16 July 2015 (Section)	1. Sources
VM0032 Version 1 - 16 July 2015 (Description)	VCS AFOLU Non-Permanence Risk Tool
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NKCP VCS CCB Project Description
Findings	
NCR/CL/OFI	
Response from Project Proponent	
Findings	The PD Section 4.1 omits mention of this required tool. The VCS+CCB template for this section states "Include also the title and version number of any tools applied by the project."
NCR/CL/OFI	CL: Please address the findings and report this required tool in the PD Section 4.1.
Response from Project Proponent	The tool is now mentioned in the MR
Findings	Section 1 of the PD now appropriately reports this tool. The item is addressed.
Item Number	24
VM0032 Version 1 - 16 July 2015 (Section)	4. APPLICABILITY CONDITIONS
VM0032 Version 1 - 16 July 2015 (Description)	2. Lands are grazed and/or subject to fires in the baseline and/or project scenarios. Lands may be used for different purposes, such as livestock production, conservation, hunting or tourism.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NKCP VCS CCB Project Description v2.1.3 draft 1 Feb 12 2019.pdf, section 2.2, section 4.2 #2
Findings	Lands are grazed, but not subject to much in the way of fire. Also used for tourism. This applicability condition is met, but the methodology applicability condition as transcribed into the PD reflects an older version and the updated language is needed.
NCR/CL/OFI	NCR: Please address the findings and update the language for all applicability conditions in the PD to reflect the final, approved VM0032 methodology. In doing so, please ensure that descriptions completely address the approved VM0032 methodology applicability conditions.
Response from Project Proponent	The language for each applicability condition has been updated
Findings	Section 4.2 of the PD, v2, dated 12 April 2017 has not been updated to the current language in the methodology.

NCR/CL/OFI	NCR - see findings. Update PD language to current methodology language.
Response from Project Proponent	The language for each applicability condition has been updated
Findings	Section 4.2 of v2.1.2 of the PD appears to be identical to that of v2.0. Applicability condition #2 is still not the same applicability condition listed in the methodology.
NCR/CL/OFI	CL: Please update the PD with the correct applicability condition #2.
Response from Project Proponent	The language for applicability condition 2) has been updated. Submission of Errata and Clarifications for Methodology VM0032 to the VCS corrects the language of applicability condition 3) to allow de minimis losses of woody carbon in the project area to be calculated against baseline emissions and ex ante removals. This correction was recommended by the VCS
Findings	An Errata and Clarification document was issued by VCS on 01 April 2019 related to this applicability condition (#1 Erratum) though the revision applied to applicability condition #5. The previous clarification request was for updating the language for this applicability condition in Section 4.2 of the PD. This has been accomplished. The item is addressed.
Item Number	25
VM0032 Version 1 - 16 July 2015 (Section)	4. APPLICABILITY CONDITIONS
VM0032 Version 1 - 16 July 2015 (Description)	3. The project must be structured to keep livestock within the project area, and the project proponent must be able to enforce the boundaries of the project area.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD Section 4.2 #4, section 4.6
Findings	More discussion is needed in project documentation on the way the project proponent is able to enforce the boundaries of the project area, especially in outlying conservancies, like Biliqo Bulesa.
NCR/CL/OFI	NCR: Please discuss in more detail the way the project proponent is able to enforce the boundaries of the project area, especially in outlying conservancies, like Biliqo Bulesa.
Response from Project Proponent	Two paragraphs of details describing how and evidence for community enforcement and awareness of project boundaries is now in section 4.2

Findings	Section 4.2 (3)of the PD, v2, dated 12 April 2017 states that members of the conservancies are aware of conservancy boundaries, and as evidence points to the NRT State of the Conservancies Report for 2015, which is said to include references to awareness of incursions in social monitoring data. The report was reviewed and no social monitoring data was found that referred to awareness of incursions. The report includes sufficient information to infer that the people are aware of boundaries, with a section on violent conflicts between ethnic groups as a result of the movement of livestock. The report also included descriptions of rangers and patrol duties. It appears that a reasonable effort is being made to monitor project boundaries.
NCR/CL/OFI	CL - Please direct the auditors to the described social monitoring data showing awareness of incursions.
Response from Project Proponent	Two paragraphs of details describing how and evidence for community enforcement and awareness of project boundaries is now in section 4.2
Findings	There is no difference between versions 2.1.2 and 2.0 of the PD, in regard to this item.
NCR/CL/OFI	CL: Please respond to the previous CL.
Response from Project Proponent	Social data, referenced to NRT 2017 State of the Conservancies Report showing the percent of people that identified encroachment of off-projectlivestock is now presented insection 4.2 (3) of the PD.
Findings	The project has stated that social monitoring data is obtained through NRT's activities, specifically the "NRT State of the Conservancies Report for 2017". The verification team understands that these periodic reports provide awareness of incursions where livestock raiding, grazing, and land are the three most common conflict types. The project in the long term aims to incentivize retention of livestock within the project area and boundary enforcement is maintained through local patrol monitoring personnel as part of NRT's larger mission. This applicability condition appears to generally be satisfied at the time of audit but a forward action request is issued to ensure the project continues to strive to meet it. The item is addressed.
Item Number	26
VM0032 Version 1 - 16 July 2015 (Section)	4. APPLICABILITY CONDITIONS
VM0032 Version 1 - 16 July 2015 (Description)	4. The project must result in no net increase in the density of, or time spent by animals in confined corrals where dung can pile up and begin to decompose anaerobically and result in CH4 and N2O emissions, such as an increase in the number of livestock aggregated (eg, kept in corrals or pens) that would result in more than 50 percent of the ground area covered by dung.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD Section 4.2 #5

Findings	Auditors note that the PD doesn't state that animals will not be confined. The fact that additional animals are not expected to be added to the range does not mean animals won't be penned with manure build up. Please address.
NCR/CL/OFI	NCR: Please update project documentation to address the fact that additional animals are not expected to be added to the range does not mean animals won't be penned with manure build up.
Response from Project Proponent	The connection between animal numbers and expected economic motivations for livestock production will not change the number of bomas or animals harbored in them.
Findings	The project proponent's response does not address the NCR.
NCR/CL/OFI	NCR - The fact that overall numbers of livestock will not change has no bearing on whether the relative proportion of those animals confined changes. Please address.
Response from Project Proponent	The connection between animal numbers and expected economic motivations for livestock production will not change the number of bomas or animals harbored in them. Number of cattle in bomas is regulated by family herd size not commerical operations. Further details in the PD address other possible incentives to pen cattle.
Findings	Section 4.2 of v2.1 of the PD explains that one of the goals of the project is to achieve greater sustainability in livestock numbers, including a change in the tradition of equating wealth with livestock numbers. The project provides no incentive to increase livestock numbers. Animals were not seen confined during the site visits. Item closed.
Item Number	27
VM0032 Version 1 - 16 July 2015 (Section)	4. APPLICABILITY CONDITIONS
VM0032 Version 1 - 16 July 2015 (Description)	5. Baseline emissions derived from livelihood-driven human impacts on aboveground woody biomass (eg, cutting for fuel wood, charcoal or timber sales) must be deemed de minimis (ie, not included in the cumulative 95 percent of total baseline emissions) and project activities cannot significantly alter such livelihood-driven activities.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD Section 4.2 #5; NRT Soil Carbon Data and Removal Calculations v4.xlsx
Findings	Auditors note that the PD compares emissions from charcoal to total carbon stocks instead of total emissions.
NCR/CL/OFI	NCR: Please address the findings and compare emissions from charcoal to total emissions of the baseline in the PD.
Response from Project Proponent	Literature references for charcoal use and production for pastoralists in the project area are detailed and compared against project baseline emissions, not baseline carbon stocks
Findings	Section 4.2, #5 of V2 of the PD, dated 12 April 2017 compares emissions from charcoal with total emissions, which are 3.4% of baseline emissions (de minimis). Item closed.

NCR/CL/OFI	
Response from Project Proponent	Literature references for charcoal use and production for pastoralists in the project area are detailed and compared against project baseline emissions, not baseline carbon stocks
Findings	This item was re-opened upon discovery that baseline emissions were not as stated. Section 4.2, #5 of the PD states that total emissions from charcoal production is calculated as 17,624tCO2e/year, and baseline emissions from livestock produced methane is 506,000 tCO2e/year, and refers to table 8 in the PD. Table 8 provides the allometric equations used to calculate methane emissions, not baseline emissions from animals. Table 11 appears to be the one in question, however the baseline emissions from animals in the table is 156,186 tCO2e/year. If this is correct, emissions due to charcoal are >11% of total emissions, and not de minimis. This item was discussed via email with VCS through the summer of 2018, records of the email exchange will be retained as part of the audit trail. The finding remains unresolved at this time and is reissued.
NCR/CL/OFI	CL: Please address the findings and demonstrate the project is able to satisfy this applicability condition.
Response from Project Proponent	
Findings	An Errata and Clarification document was issued by VCS on 01 April 2019 related to this applicability condition (#1 Erratum). The VCS approved revision is as follows "Baseline emissions derived from livelihood-driven human impacts on aboveground woody biomass (e.g., cutting for fuel wood, charcoal or timber sales) must be deemed de minimis (i.e., not included in the cumulative 95 percent of total baseline emissions less than five percent of the total GHG benefit generated by the project) and project activities cannot significantly alter such livelihood-driven activities." a) The validation team understands that the newly revised language for this applicability should be reflected in reporting in Section 4.2 of the PD. This section also needs to be revised to better reflect how the project meets the applicability condition as older language is now longer relevant , for instance "Charcoal emissions are thus not within the cumulative 95% of total baseline emissions." b) The analysis to demonstrate charcoal emissions are de minimis is unclear in terms of the period, it appears the proponent has chosen year 2014 for the demonstration. The validation team understands that since the "less than five percent of the total GHG benefit generated by the project" de minimis analysis uses annual values that this demonstration should occur for each year the total GHG benefit is computed (following VM0032 and noting methods in AFOLU Requirements v3.6 Section 4.7). c) Table 11 total appears incorrect for "Stratum Mean Annual Removal t CO2e / ha" or is perhaps misleading as no year is mentioned

	This finding is pending parameter BEM,t.
Item Number	28
VM0032 Version 1 - 16 July 2015 (Section)	4. APPLICABILITY CONDITIONS
VM0032 Version 1 - 16 July 2015 (Description)	6. For projects that propose to modify grazing, the maximum individual project size is 3 million ha or 5 percent of a country's land area currently or potentially used to graze livestock, as judged by national government land use inventories or other documentation.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD Section 4.2 #7
Findings	Project area is 2.03 million ha, and it may be that this does not comprise 5% or more of the country's grazing land. However, the data used by the project proponent lumps all land that is not described as "forest cover" together as grazing land, ignoring urban land, farmland, and other lands not grazed. Adding up the categories on the linked website does not equal the total land area of Kenya, upon which the project proponent is basing his numbers. Further this data is dated from 2005 and more recent data from national government land use inventories or other documentation is required.

NCR/CL/OFI	NCR: Please address the findings and fulfill this applicability condition with better data presented in Section 4.2 of the PD.
Response from Project Proponent	Addressed with data on Kenya land use from Kenya Land Alliance. Project area is 4.7% of land used for livestock production
Findings	Referenced source (Land Use in Kenya, The Case for a National Land Use Policy, by the Kenya Land alliance indicates there are about 48,900,000 acres used for grazing in Kenya. The project area is less than 5% of the land area in Kenya suitable/used for grazing. Item closed.
NCR/CL/OFI	
Response from Project Proponent	Addressed with data on Kenya land use from Kenya Land Alliance. Project area is 4.7% of land used for livestock production
Findings	This response was added again, without regard to the clearing of the item, resulting in it being checked again. Section 4.2, #6 of the PD states that the land used for livestock production in Kenya, which includes more land than just grazing lands, is about 42 million ha. The grazing land in the project area is about 1.3 million ha, which is about 3.1% of the grazing land in Kenya. Item closed.
Item Number	29
VM0032 Version 1 - 16 July 2015 (Section)	6 BASELINE SCENARIO
VM0032 Version 1 - 16 July 2015 (Description)	To develop the baseline scenario, the project proponent must document, using published or gathered project-specific data and/or models, historic grazing plans or use of grazing areas by livestock and fire histories in the project area. The method to determine the most plausible baseline condition is provided in Section 8 (Baseline Emissions) with additional information provided in Section 9.3 (Description of the Monitoring Plan). The method includes:
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD Section 4.5.1
Findings	PD states that satellite imagery analysis establishes the baseline range conditions.
NCR/CL/OFI	
Response from Project Proponent	The satellite data are now shown in the PD
Findings	The discussion in sec 4.5.2 is essentially unchanged. I seen no addition to the PD.
NCR/CL/OFI	
Response from Project Proponent	Fig. 12 on p. 41 opf the PD shows the satellite data on NDVI used to establish the baseline vegetation conditions
Findings	This criteria is captured in subsequent elements within the section. The finding here is addressed.
Item Number	30

VM0032 Version 1 - 16 July 2015 (Section)	6 BASELINE SCENARIO
VM0032 Version 1 - 16 July 2015 (Description)	2) As evidence of past grazing practices and impacts, the project proponent must demonstrate a grazing history, as determined from past livestock grazing animal counts, ground measurements of grazing impacts, and/or ground-validated interpretations of satellite imagery (such as the Normalized Difference Vegetation Index (NDVI), Soil-Adjusted Vegetation Index (SAVI), or other similar index from a minimum of four intervals across the 10 years, with at least one image from 8-10 years prior to the project start date.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 4.5.1 of the PD and MR, NRT Remote sensing validation data July 2014.xlsx
Findings	Auditors reviewed the submitted file "NRT Remote sensing validation data July 2014.xlsx." From the data supplied, it is unclear as to whether the temporal component of this requirement has been met, the intervals are not specified.
NCR/CL/OFI	CL: Please clarify from the data supplied how the temporal element of this requirement has been met.
Response from Project Proponent	NDVI data for mutliple Conservancies are shown for the period 2002-2012 in Fig. 7
Findings	EMJ/2015-11-30
NCR/CL/OFI	Figure 7 in the PD shows land use types, without reference to any time period. Figure 12, in section 4.5.2 of the NKCP PD, v2, dated 12 April 2017, describes range condtions in the different conservancies over a ten year period (2002 - 2012). Item closed.
Response from Project Proponent	NDVI data for mutliple Conservancies are shown for the period 2002-2012 in Fig. 7
Findings	This response was added again, without regard to the clearing of the item, resulting in it being checked again. Figure 7 is a land cover map of Kenya. However, figure 12 shows NDVI for 10 years prior to the start date. Item closed.
Item Number	31
VM0032 Version 1 - 16 July 2015 (Section)	6 BASELINE SCENARIO
VM0032 Version 1 - 16 July 2015 (Description)	3) Baseline methane emissions require as detailed as possible livestock grazing animal censuses through any combination of professional aerial surveys, ground counts with appropriate spatial extrapolation to the project area, or household surveys of livestock held by each household over the previous 10 years. Censuses must categorize, to the extent possible, the species, sex, and age of each animal, and an average body weight for each category.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 4.5.3.1, NRT HH Livestock Survey spreadsheet; NKCP methane calculations 2017.xlsx

Findings	Auditors reviewed the submitted file "NRT HH Livestock Survey spreadsheet" and it does not appear as though the survey results extend the full length of the 10 year baseline period following this requirement. However, the PD states, "Based on three different social surveys, the following baseline animal numbers for each of the 14 participating Conservancies were obtained for 6 different years during 2004-2011." Explanation is needed and worksheet references to the methods the proponent used to aggregate the results of all the surveys for a comprehensive grazing census for the project area.
NCR/CL/OFI	CL: Please address the findings and explain the methods used to aggregate surveys for a comprehensive grazing animal count. In doing so, please detail each step, referencing files as needed in order to meet this requirement.
Response from Project Proponent	An expanded treatment of the methods used to determine livestock numbers in past years is presented in section 4.5.3.1 of the PD. Methods to assess family livestock numbers, number of families with livestock, reporting biases, and methods of adding up livestock across Conservancies are presented.
Findings	Section 4.5.3.1 of the PDv2.1 was reviewed in response to this finding. Animal census data was found in "NKCP methane calculations 2017.xlsx where it appears 178 livestock owning households were surveyed, perhaps by NRT, which differs from the 168 reported in Section 4.5.3.1 of the PD. The 2009 Kenyan government census and October 2014 NRT survey appear only to be for households. As the livestock survey was only for households owning livestock the proponent used an adjustment factor, CFN, for animal categories cattle/shoats/camels. CFN,cattle parameter differs between calculation file value applied and reported value in the PD. Verifiers were unable to find calculation of parameter CFN in the methane calculations file. Verifiers recognize that the result of the grazing animal censuses for this requirement is applied for the previous 10 years.
NCR/CL/OFI	CL: Please address the findings and correct the CFN adjustment factor. Please also clarify the location of the calculation for this parameter.
Response from Project Proponent	BNc is incorrectly defined in equation 4 of PD relative to equation 2 of methodology and PD. This was changed to what was used in the methodology Nc,t number in category c at time t. The correction factor for cattle listed in the spreadsheet was entered incorrectly based on the household data used to generate it, and was changed to 0.16 to match that used in the PD. Data used to generate calculation of CFN are in file ????
Findings	The verification team reviewed the responses and revised materials. The calculation for the mean number of livestock of different classes c (cattle, shoats, donkeys, camels) per household was reviewed and it is not clear where the correction factors for each livestock class are computed (ex. cattle 0.16). It also appears as though the response is incomplete.

NCR/CL/OFI	CL: Please address the findings and clarify how the livestock correction factors were determined. Please ensure the response is complete.
Response from Project Proponent	Livestock correction factors were calculated as the ratio of mean per household livestock numberfor the community as a whole divided by the mean household lievstock number from the specific livestock survey. This is described in Tab "Corrections" in file 'NRT 2014 Livestock Herder Survey Analysis.xlx' The community means used in calculating the factors were calculated in the "Livestick Distr by Type" tab of the'NRT 2014 HH Survey.xls' file.
Findings	The audit team reviewed the newly submitted file "NRT 2014 Livestock Herder Survey Analysis.xlx" "CorrectionFactors" tab in response to the finding. The mean by conservancy for each animal is inconsistently determined, some values are hardcoded and others are linked to conservancy pivot tabs. Donkeys were noted to lack a correction factor although their counts are based on a fraction of cattle because no survey data existed.
Item Number	32
VM0032 Version 1 - 16 July 2015 (Section)	6 BASELINE SCENARIO
VM0032 Version 1 - 16 July 2015 (Description)	6) Where the modeled approach is used, predictions of soil carbon stocks or stock changes from the chosen model of soil carbon dynamics, such as Century, must be tested to demonstrate it is appropriate for use in the project area with measured soil carbon stocks or stock changes from the project area. Correlations between predicted and observed stocks must have R2 ¬> 0.80 within strata and an uncertainty based on a 95 percent confidence interval of < 20 percent for predicted values applicable to the project area. The use of less accurate model predictions imply larger confidence limits in estimated carbon stocks or stock change after 10 years and thus larger uncertainty deductions in claimed emission reductions. If a model cannot be found to provide sufficient accuracy, the measured approach must be used.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 5.4.3.1, SNAP model
Findings	Model should be retested after soils are resampled.
NCR/CL/OFI	CL: Please make sure the model is retested after soils are resampled.
Response from Project Proponent	The model has been retested and the slope, intercept, and bias are all within the acceptable levels. This is presented in section 5.4.3.1

Findings	Section 5.4.3.1 of the NKCP PD, v2, dated 12 April 2017, reports the model performed within acceptable limits, with an R2 of 0.9072 and intercept of -0.24. Pending repeatability of plot measurements and rerun of SNAP model. The verification team reviewed the application of the SNAP model. It was noted that the equations applied within the "Measurements" tab of "NRT Soil Carbon Data and Calculations v2.xlsx" do not follow the equations as presented in Ritchie 2014. While speaking with the project developer, it was discussed that these differences are the result of local calibration. If so, this would constitute a deviation to the methodology, which would need to be approved by VCS, as it is not a deviation due to monitoring or measurements. Further, the verifiers were unable to confirm the source of the RAIN variable within the SNAP model beyond the map in the Project Design Document. Further substantiation is requested. The verifiers also reviewed the statistical test of the SNAP model. The requirement states that the R2 test must be within strata. As it currently stands, the test is applied across the project area. Further, the verifiers could not reproduce the R2 value of 0.8703 as presented in the SNAP validation worksheet and the PD. The verifier confirmed that, the 90% confidence interval of the predicted SOC values as a percent of the mean was less than 20%.
NCR/CL/OFI	CL: Please clarify why the SNAP model as utilized in project accounting does not correspond with Ritchie 2014. If calibration is applied to the SNAP model, please provide VCS approval of the methodology deviation due to the local calibration of the SNAP model. CL: Please clarify and provide the source of the RAIN variable in the SNAP model. CL: Please perform the R2 test of the SNAP model within strata. CL: Please clarify the R2 value of 0.8703 in the SNAP validation.
Response from Project Proponent	see Errata and Clarifications for VM0032 submitted to VCS for language that permits local calibration of models prior to assessment for the project to align with calibration allowed during model assessment at re-validation of the project. Similarly, clarification is provided that makes the methodology consistent in allowing testing of the model across, not within strata in order to provide the maximum possible variation in conditions. New rainfall data (Fig. 10, section 4.5.1), available from NRT, were obtained as a raster layer of mean annual rainfall over the past ten years as determined by CHIRPs (Climate Hazards Group InfraRed Precipitation with Station) http://chg.geog.ucsb.edu/data/chirps/ . This layer allows mean annual rainfall to be resolved at the location of sampling stations and provides much higher spatial resolution. Data for each station were used in the

	calculations of SOC density by the SNAP model (see NRT Soil Carbon Data ad Calculations v4)
Findings	An Errata and Clarifications document was provided by Verra that clarifies states that the model may be calibrated, and that the significance testing is to be applied across strata. The calibration as presented in the "SNAP calibration" tab of NRT Soil Carbon Data and Removal Calculations v4.xlsx was reviewed. The calibration methods are appropriate, pending the review of the documents that produce the calibration. It was also noted that the application of the calibration was not consistent in the "ANPPmax" column of the "Measurements" tab. The SNAP model as implemented in NRT Soil Carbon Data and Removal Calculations v4.xlsx does not completely correspond to Ritchie 2014 and demonstrated calibration. Any differences between the published equations in Ritchie 2014 and the SNAP model as implemented in NRT Soil Carbon Data and Removal Calculations v4.xlsx must be demonstrated. The VVB independently accessed CHIRPS data from the CHIRPS website. The VVB was unable to reproduce similar values to the project for the RAIN variable. In order to confirm the RAIN variable, the VVB requests the source data utilized by the project to produce the RAIN variable. The VVB reviewed the predicted data to ensure that "an uncertainty based on a 95 percent confidence interval of < 20 percent for predicted values applicable to the project area" was met. The VVB interprets this requirement to mean that the 95% confidence interval of predicted values from the SNAP model must be within 20% of the mean of said predictions. It was noted that a 95% confidence interval of the predicted values was greater than 20%. The VVB also checked the inputs to the model in the "Measurements" tab. It was noted that not all data within the "Measurements" tab from the previously submitted version of NRT Soil Carbon Data and Removal Calculations (NRT Soil Carbon Data and Removal

	Calculations v2.xlsx) matches the data in the "Measurements" tab of NRT Soil Carbon Data and Removal Calculations v4.xlsx.

NCR/CL/OFI	CL: Please provide the documents utilized to calculate the calibration in the "SNAP calibration" tab of NRT Soil Carbon Data and Removal Calculations v4.xlsx. Please ensure that the calibration is consistently applied in all instances. CL: Please ensure that the SNAP model as implemented is as written in the Ritchie 2014 paper. For any differences between the model as implemented and the Ritchie 2014 source, please provide justification for those differences. CL: Please provide the CHIRPS data source as utilized to produce the RAIN variable. Please provide any source data that is available, such as geospatial files. CL: Please clarify the methods undertaken to calculate the uncertainty based on a 95 percent confidence interval of predicted values applicable to the project area and how this was less than 20%. CL: Please clarify any discrepancies in data within the "Measurements" tab of NRT Soil Carbon Data and Removal Calculations v4.xlsx and the previously submitted NRT Soil Carbon Data and Removal Calculations spreadsheets.

Response from Project Proponent	1.All versions of the model used, including the 'Measurements' and the 'Removals per Station' and in the Monte Carlo simulations should now be the same, including the corrections for both ANPPmax and BNPP. 2. The local calibration of the model is justified in detail in section 4.5.4.3 of the PD and a similar section in the MR. Both of the original equations are shown and their explicit new versions are shown. 3.The data were actually from worldclim.org, not CHIRPS, but derived in a similar manner http://datasets.wri.org/dataset/average-annual-rainfall-in-kenya Mean annual rainfall data used to assign rainfall values to specific sampling points is file Kenyameanannualrain.adf, which is a raster file in UTM coordinates that can be opened in Arc or other GIS software. 4.Ideally this test should be done per stratum, but it turns ut i does not matter. The mean SOC per sampling station and SE were calculated for all 235 stations and compared with the observed mean (see bottom of Predicted and Observed SOC columns in the 'Measurements' tab . The uncertainty over all sampling stations was 16% which is less than 20% Similar results are obtained if the calculations for balck and sandy loam soils are done separately 5. Rainfall data are different because previous rainfall data were interpolated off published maps. The new rainfall data were read directly off raster files of satellite-estimated mean annual rainfall from WorldClim, as published by the World Resources Institute. Lignin and cellulose and grazing intensity were re-checked and updated from field vegetation survey reports of grazing intensity and dominance of annuals versus perennials. We found that values of grazing intensity and dominant plant type were not all correct in previous spreadsheets, due to errors in cutting and pasting in data in both spreadsheets due to the need to rebuild the database in' Measurements' following previous file corruptions. Original data were recovered using Cleverfiles Disk Drill and presented in two files, one with soil data and the other with vegetation data. While not directly linked due to the likelihood of file corruption when one file sources another, the data have been checked and "Measurements' tab data now correspond to original field and lab reports

Findings	The project developer provided the publications from which the "SNAP calibration" tab of NRT Soil Carbon Data and Removal Calculations v4.1.xlsx was sourced. The VVB could not locate all numbers in the "SNAP calibration" tab of NRT Soil Carbon Data and Removal Calculations v4.1.xlsx within the cited publications. The SNAP model is implemented in a manner that is unable to be confirmed by the VVB at this time, including the following discrepancies between the Ritchie 2014 paper and the "Measurements" tab of NRT Soil Carbon Data and Removal Calculations v4.2.xlsx: 1. The calculation of PL does not match that as presented in Ritchie 2014. 2. BNPP now includes LAI as an independent variable. However, since the published BNPP equation does not include LAI as an independent variable, this constitutes a change of the SNAP model. The inclusion of LAI within the BNPP equation should be supported with a demonstration of appropriateness. 3. The calculation of PDSOCt does not match that as presented in Ritchie 2014. 4. The calculation of SOCeq does not match that as presented in Ritchie 2014. The VVB accessed the RAIN data and confirmed appropriate calculation of the RAIN variable on a random subset of data. This item is addressed. The VVB could not reproduce the 16% claimed by the project developer. However, the VVB conducted a data check and noted that the project is currently within the 20% requirement. As such, this item is addressed, pending the resolution of all precedent findings and requests. The VVB sourced data from the "Raw Data" folder of files received by the VVB on 10 May 2019. The VVB noted that the "LigCell" field of the "Measurements" tab of NRT Soil Carbon Data and Removal Calculations v4.2.xlsx did not fully correspond to the raw data from the above noted folder of files. The VVB noted that the "Sand%" field of the "Measurements" tab of NRT Soil Carbon Data and Removal Calculations v4.2.xlsx did not fully correspond to the raw data from the above noted folder of files. The VVB noted that the "Historical GI%" field of the "Measurements" tab of NRT Soil Carbon Data and Removal Calculations v4.2.xlsx did not fully correspond to the raw data from the above noted folder of files. The VVB noted that the "Dominant Plant" field of the "Measurements" tab of NRT Soil Carbon Data and Removal Calculations v4.2.xlsx did not fully correspond to the raw data from the above noted folder of files. The VVB noted that the "Depth of Core cm" field of the "Measurements" tab of NRT Soil Carbon Data and Removal Calculations v4.2.xlsx did not fully correspond to the raw data from the above noted folder of files.

Item Number	33
VM0032 Version 1 - 16 July 2015 (Section)	6 BASELINE SCENARIO
VM0032 Version 1 - 16 July 2015 (Description)	7) The selected model is used to model the soil carbon dynamics and to estimate the maximum SOC that would have occurred in the 10 years prior to the project start date. This provides an uncertainty deduction for activity-based emission reduction calculations.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 4.5.4.3
Findings	Uncertainty deduction should be recalculated after soils are resampled. See above.
NCR/CL/OFI	NCR: Uncertainty deduction should be recalculated after soils are resampled. See above.
Response from Project Proponent	Uncertainty deduction has been recalculated after new bulk density of soils was measured. This is in worksheets "Uncertainty in removals" and "Removals by Strata" in the excel file NRT Soil Carbon Data and Calculations v2
Findings	Uncertainty deduction was recalculated in section 5.4.4 of the NKCP PD, v2, dated 12 April 2017. The verifiers reviewed the Monte Carlo simulation for testing the SNAP model within the "NKCP SNAP Monte Carlo simulation.xlsx" file. Several issues were noted: 1. Inputs Tab 1.a. The verifiers are unsure of the source of the "Expected Value" and the "Standard Error" values. On the modeling call, the project developer detailed that the values were utilized in the project run, but the verifiers could not confirm this. 1.b. The verifiers are unsure if the values in the "Inputs" tab are for one stratum, or all strata. 2. Machine Tab 2.a. Some parameters and their standard errors do not match those as presented in Ritchie 2014. 2.b. Column V ("FireFreq") contains inconsistent formulation down the column. 2.c. It is unclear why the standard error of "FireFreq" is 0.01, when there is no uncertainty in the lack of fires in the region. 2.d. "SOC0" standard error is not multiplied by 100, even though the mean is. It is also unclear why the "SOC0" mean is multiplied by 100. 2.e. It is unclear why several of the columns are constrained to only non-negative numbers. 2.f. It is unclear why the "Change in SOC" values are divided by 100. 2.g. Some formulas within the SNAP model do not match those as presented in Ritchie 2014.

NCR/CL/OFI	CL: 1.a. Please clarify the source of the "Expected Value" and the "Standard Error" values in the "Inputs" tab. CL: 1.b. Please clarify if the values in the "Inputs" tab are values from one stratum or all strata. If the values are only for one stratum, please provide inputs used for all Monte Carlo runs for all strata. CL: 2.a. Please clarify why some parameters and their standard errors within the "Machine" tab do not match those as presented in Ritchie 2014. CL: 2.b. Please clarify how the "FireFreq" column's inconsistent formulation across the column in the "Machine" tab is appropriate CL: 2.c. Please clarify the appropriateness of utilizing a standard error of 0.01 for "FireFreq" within the "Machine" tab, even though the uncertainty of fire frequency is zero. CL: 2.d. Please clarify why "SOC0" is multiplied by 100 within the "Machine" tab. Please also clarify why the standard error of "SOC0" is not multiplied by 100. CL: 2.e. Please clarify why several of the columns in the "Machine" tab are constrained to non-negative numbers. CL: 2.f. Please clarify why the "Change in SOC" values are divided by 100 within the "Machine" tab. CL: 2.g. Please clarify why some formulas within the "Machine" tab do not match those as presented in Ritchie 2014.

Response from Project Proponent	Errors in transcription and modification of formulas have been checked and fixed. All Monte Carlo calculations have been re-run with the corrected model and with the data from Conservancy and soil types strata from table in "SOC and Model Uncertainty" in NRT Soil Carbon and Removal Calculations v4.xls CL: 1.a. Please clarify the source of the "Expected Value" and the "Standard Error" values in the "Inputs" tab. Inputs are from from table in "SOC and Model Uncertainty" in NRT Soil Carbon and Removal Calculations v4.xls CL: 1.b. Please clarify if the values in the "Inputs" tab are values from one stratum or all strata. If the values are only for one stratum, please provide inputs used for all Monte Carlo runs for all strata. Data inputs are means and SE for one stratum. CL: 2.a. Please clarify why some parameters and their standard errors within the "Machine" tab do not match those as presented in Ritchie 2014. The SE for PLB0 has been changed to 0.061 from 0.011. Other parameter differences are just due to rounding in the published table. CL: 2.b. Please clarify how the "FireFreq" column's inconsistent formulation across the column in the "Machine" tab is appropriate. Formulation is now consistent CL: 2.c. Please clarify the appropriateness of utilizing a standard error of 0.01 for "FireFreq" within the "Machine" tab, even though the uncertainty of fire frequency is zero. SE = 0 causes the random draw function to divide by zero. Thus a very small SE that would not affect the calculations is used. CL: 2.d. Please clarify why "SOC0" is multiplied by 100 within the "Machine" tab. Please also clarify why the standard error of "SOC0" is not multiplied by 100. In the model, calculations are made on the basis of g/m2 while inputs are in tons/ha. The conversion of input SE is now simlar CL: 2.e. Please clarify why several of the columns in the "Machine" tab are constrained to non-negative numbers. Some parameters should never have zero values and so their random draw should just return zero. However, this should not apply to carbon change and the resulting expected change and uncertainty now use the correct column. CL: 2.f. Please clarify why the "Change in SOC" values are divided by 100 within the "Machine" tab. They are being converted back to tons/ha CL: 2.g. Please clarify why some formulas within the "Machine" tab do not match those as presented in Ritchie 2014. Some formulas were adjusted in SNAP as used for the project The Errors and Clarifications for VM0032 submitted to the VCS make it clear that the methodology allows local calibration of models. The discrepancy is due to changes in coefficients that better account for conditions in degraded rangelands grazed by livestock.

Findings	1.a. The VVB located the source of the "Expected Value" and the "Standard Error" values. However, it is unclear why only the first row from the source ("SOC and Model Uncertainty" in NRT Soil Carbon and Removal Calculations v4.xls) is used instead of an estimation, such as average values to better represent the range of expected values. Further, it was noted that the "Soil Sand Content (%)" column numbers did not correlate to the source. 1.b. Please see the finding above pertaining to the inputs. 2.a. Some parameters and their standard errors do not match those as presented in Ritchie 2014. If the values in Ritchie 2014 are not applicable to the Monte Carlo run due to rounding, supporting documentation should be provided to support the differing numbers. 2.c. The VVB understands that a SE of 0 causes the Monte Carlo simulation to fail. This item is addressed. 2.d. This item is addressed. 2.e. It is unclear why several of the columns (ex: Change in SOC and its precedents) are still constrained to only non-negative numbers. 2.f. If SOCeq is in terms of g/m2, it is unclear how the conversion to ha would be to divide by 100. 2.g. The VVB requests demonstration/documentation of any changes to the Ritchie 2014 model forms and coefficients that are applied within the Monte Carlo demonstration. 2.h. It was noted that the "Rainfall" SE was incorrect. 2.i. It was noted that some inputs were inconsistently applied. For example, the "SAND%" values are sometimes divided by 100 and sometimes not.
NCR/CL/OFI	1.a. CL: Please clarify why only the first row from the source of the "Expected Value" and the "Standard Error" values ("SOC and Model Uncertainty" in NRT Soil Carbon and Removal Calculations v4.xls) is utilized, instead of representative values of the range of values (and strata) in that document. Please also clarify why the "Soil Sand Content (%)" column numbers did not correlate to the source. 2.a. CL: Please ensure that all parameters and their standard errors match those as presented in Ritchie 2014. Otherwise, please provide supporting documentation for any values that do not match Ritchie 2014 values. 2.e. CL: Please clarify why several of the columns (ex: Change in SOC and its precedents) are still constrained to only non-negative numbers. 2.f. CL: Please clarify if SOCeq is in terms of g/m2. If so, please clarify the conversion from m2 to ha of dividing by 100. 2.g. CL: Please provide a demonstration/documentation of any changes to the Ritchie 2014 model forms and coefficients that are applied within the Monte Carlo demonstration. 2.h. CL: Please clarify the discrepancies between the "Rainfall" SE in the "Machine" tab and the "Inputs" tab. 2.i. CL: Please ensure that all inputs are consistently applied in the Monte Carlo analysis.

Response from Project Proponent	1.a. Each row of source data derives from each stratum and the variation within it. Monte Carlo simulations were run for each stratum and a separate uncertainty was reported for each stratum in Column AB in Strata Removals Uncertainty. 1.b. Sand%and SE input into the model in the Monte Carlo simulation is now properly sourced from the cut and paste field in cells W6 and X6. 2.a.The parameters and SE of the core model equations now match exactly those reported in Table 2 of Ritchie 2014. Note the y-intercept for water holding capacity vs SAND% reported in Ritchie Table 2 is different (1.04) from that used in the equation in the text of the paper (1.33). We used the lower value as we judged it more appropriate for NRT Conservancy soils with such low organic matter (most < 0.6%). 2.e. The Expected Projected Change and its SE are now linked to the solutions, which are now not constrained to be greater than zero. 2.f. The model calculates soil carbon density as g/m^2, in keeping with the productivity data, which are in g/m^2. Soil carbon densities from the Measurements tab are reported in tons/ha. tons = 10^-6 g, m^2 = 10^-4 ha. Thus g/m^2 = 10^-2 tons/ha 2.g. Both the PD and MR now contain extensive justification for the use of a correction for the type of dominant forage plants. Sample stations dominated by perennials or with mixed annuals and perennials use the Ritchie 2014 equations without modification; sample stations dominated by annuals use different intercepts and slopes for ANPP and BNPP, as justified in detail in the PD and MR. 2.h. The Rainfall SE in the 'Machine' tab is now sourced properly from cell I4 in the 'Inputs' tab. 2.i. All inputs are now read from the cut and paste field in the'Input' tab to the input cells, and from the input cells to the input cells in the'Machine' tab

Findings	The VVB reviewed the input data for the Monte Carlo runs in the "Strata Removals Uncertainty" tab of NRT Soil Carbon Data and Removal Calculations v4.2.xlsx. The project developer provided additional clarity on the mode of calculations within this tab, but the VVB could not reproduce said clarifications. Because the cells are values-only within that tab, the VVB could not determine . The VVB requests that this workbook be provided with full formulation in this tab to demonstrate how the Monte Carlo inputs were calculated in this tab. It is unclear why the formulation in "FireFreq" field of the "Machine" tab of the Monte Carlo analysis workbook is inconsistent. The VVB reviewed the Monte Carlo runs by stratum. It is unclear what the 3.84 factor is in the calculation of "Uncertainty" in the "Inputs" tab of NKCP SNAP Monte Carlo simulation.xlsx. The VVB re-ran the Monte Carlo runs and compared uncertainty output. It is known that with each Monte Carlo run, uncertainty will change based on the random number generator. However, the project had, on average, an uncertainty that was 25% less than the uncertainty calculated by the VVB. It was noted in the Monte Carlo runs that the "black" stratum in "Westgate" had several standard errors of 0 in the inputs. It is unclear how the uncertainty of 53% was achieved with the standard errors of 0. Some parameters and their standard errors do not match those as presented in Ritchie 2014. Ex: oWHCB1 oROOTB0 oROOTB1 oWETDAYB0 oWETDAYB1 If the values in Ritchie 2014 are not applicable to the Monte Carlo run due to rounding, supporting documentation should be provided to support the differing numbers. Change in SOC is still constrained to be greater than zero through its precedents. The conversion from g/m2 to t/ha is correctly implemented. This item is addressed. The VVB reviewed the updated Monte Carlo machine workbook. There are still differences in formulation between the workbook at the Ritchie 2014 paper in the following fields: oEst BNPP oBGLIGCELL oDDSOC

	oSoil Resp oequilibrium It is unclear to the VVB why the same calibration methods utilized in the SNAP model and described in the PD were not applied to the Monte Carlo analysis. The Rainfall SE in the "Machine" tab now correctly references the appropriate data in the "Inputs" tab. This item is addressed. Please see elsewhere pertaining to inputs findings and issues
Item Number	34
VM0032 Version 1 - 16 July 2015 (Section)	6 BASELINE SCENARIO
VM0032 Version 1 - 16 July 2015 (Description)	9) Uncertainty propagated by all estimated emissions and reductions must be calculated for baseline emissions, project emissions and reductions. Uncertainty deductions will occur if the total uncertainty + 15% percent of estimated net emissions and removals under the project scenario. The deducted removals must be directly proportional to the uncertainty.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 4.5.3.1, 4.5.4.5, 5.4.4; NRT Soil carbon data and removals worksheet
Findings	Several error messages in section 4.5.4.5, 5.4.4.
NCR/CL/OFI	CL - Please correct error messages

Response from Project Proponent	All data linked to undertainty calculations are now in the same spreadsheet file. **(response recevied from Mark 2017-04-21 "090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx").** These have been removed from the PD **(response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").**
Findings	Error messages were noted in referenced sources in the NKCP PD, v2, dated 12 April 2017. Further, verifiers were unable to locate calculation results for the combined baseline, project and removal uncertainty following this requirement. Combined uncertainty that exceeds 15% calls for a deduction. Please also see Section 8.4.4 of VM0032 where 30% is the threshold for project case uncertainty exclusively.
NCR/CL/OFI	Please correct the error messages in the references within the text of PD Sections 4.5.4.5 and .5.4.4. Please also clarify the location of combined uncertainty calculations following this requirement and project case uncertainty.
Response from Project Proponent	These have been removed from the PD
Findings	Error messages remain in the PD in Section 4.5.4.5 (Uncertainty in Baseline Emissions). However, this criteria also has upstream elements which remain unresolved in the review.
NCR/CL/OFI	CL: Please correct the error messages in the references within the text of PD Sections 4.5.4.5.
Response from Project Proponent	
Findings	Although no response was received on this item no other error messages could be found in the section of the PD stated in the clarification request nor elsewhere in the PD document. The item is addressed.
Item Number	35
VM0032 Version 1 - 16 July 2015 (Section)	8.1. Baseline Emissions
VM0032 Version 1 - 16 July 2015 (Description)	2) The average forage removal, or grazing intensity (%) by all animals, as measured by comparison of forage biomass inside and outside fenced enclosures, or inside and outside unfenced areas otherwise avoided by livestock, such as conservation areas, with similar soil and climate, or before and after planned grazing events. Estimates of grazing intensity over large areas can be made by using satellite-based indices, such as NDVI, as long as such indices are correlated with ground measurements with a R2 > 0.35.

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 4.5.2, NRT Remote sensing validation data July 2014.xlsx; NDVI Trends 20022014.xlsx
Findings	It is not clear to auditors whether this requirement for documentation of baseline period management activities has been met. The project proponent stated they used core areas and the tops of difficult-to-access escarpments as comparison to no-graze area using MODIS derived NDVI data. The file "NRT Remote sensing validation data July 2014.xlsx" was provided and grazing percent was chosen as a comparison of before and after grazing conditions using NDVI. This is permissible per the methodology. Section 4.5.2 states, "Figure 8. Relationships between NDVI measurements from individual pixels (250 x 250 m) of 15-day composite MODIS NDVI and measured mean forage biomass (shrub leaves and herbaceous plant biomass) of thirty 0.125 m2 quadrats placed randomly inside each pixel." Here, grazing percent is required to be compared against ground measurements, which are noted in caption of Figure 8 as from August 2014 in Kalama and Westgate Conservancies. No spatially explicit data was provided for the audit and it is difficult to discern whether individual MODIS pixel data are representative of continuous grazed areas and restricted grazing areas. Section 4.5.2 of the PD states, "...yielded 2x higher NDVI scores than settlement areas with continuous grazing (Fig. 6)." Figure 6 is actually rainfall distribution and validators are unable to locate the data used to substantiate this assertion. Please also refer to step 8 below requirement.
NCR/CL/OFI	CL: Please provide additional explanation for the spatial component of the MODIS NDVI data and ground measurements. In doing so, please justify that the data used in the comparison (continuous grazing vs. restricted grazing) are representative of the entire project area. Please also justify the appropriateness of using data for only 2 of the 14 Conservancies. Please also fix the referenced text in the PD Section 4.5.2 of the finding and explain the source of data used to make the assertion.
Response from Project Proponent	This issue is now addressed in section 4.5.2. with new data collected in 2016 from three additional Conservancies. Ground truth data for NDVI have now been collected at sixty sites that span the range of grazing intensities (0-99%), rainfall (300-550 mm/yr) and include sites from the plataues in Kalama used as climate references for NDVI. Data are shown in Fig. 13 and discussed on pp. 42 and 43

Findings	Verifiers re-reviewed the revised PD Section 4.5.2 which now explains the approach and basis for grazing impact evaluation using MODIS sensor based NDVI measurements. The file "NDVI Trends 20022014.xlsx" was reviewed but it wasn't clear which data was from biomass ground truth measurements. Further, verifiers were unable to locate the underlying data for Figure 13 on page 42 of the PD which appears to be the basis to satisfy this requirement.
NCR/CL/OFI	CL: Please clarify the source of ground measurement truthing data used to meet this requirement, providing additional materials and referencing data locations as needed.
Response from Project Proponent	Data are available in (included in key Excel files) NDVI Biomass Validation 2014.xls. A .kml layer of the points is also provided NDVI Validation Points.kml and the NDVI layersis also available in dropbox GIS files as MODIS_NDVI_Jun2014.tif and MODIS_NDVI_Jul2014.tif
Findings	The validation team reviewed the NDVI and ground measurement analysis results and agrees with the reasonable correlation. The MODIS sensor, NDVI dataset, is generally suitable for determining grazing intensity over large areas where NDVI is considered surrogate for grazing intensity. The item is addressed.
Item Number	36
VM0032 Version 1 - 16 July 2015 (Section)	8.1. Baseline Emissions
VM0032 Version 1 - 16 July 2015 (Description)	8) Interpreted satellite images, such as indices of NDVI] or maps of burned areas across multiple years, coupled with ground vegetation data to support the conclusion that these images are correctly interpreted with reasonable accuracy (ie, R2 > 0.35 between index and vegetation measure from 1).
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 4.5.2, 4.5.4.3, remote sensing validation data
Findings	The project has chosen to use MODIS NDVI data as evidence of the baseline vegetation conditions and their association with management activities in the project area during the baseline period. Please see the detailed finding in Step 2 above.
NCR/CL/OFI	validation
Response from Project Proponent	New remote sensing validation data are presented in the PD on page 42.
Findings	PD Figure 13 illustrates the relationship between NDVI from MODIS data and field collected biomass measurements. The relationship is reasonable and meets this requirement. The item is addressed.
Item Number	37
VM0032 Version 1 - 16 July 2015 (Section)	8.1.2. Design and Establishment of Permanent Sampling Stations

VM0032 Version 1 - 16 July 2015 (Description)	This methodology depends greatly on the success at measuring changes in SOC, the results of project activities, and/or key inputs into soil carbon models such as grazing intensity and/or the intensity and frequency of fires. Because these measurements in grasslands often vary by a large amount over distances of a few meters, the project proponent must establish permanent sampling stations, marked with permanent materials, like PVC, metal or stone, with recorded GPS locations to 10 meter accuracy, or close enough to find the permanent markers of the station.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	sections 4.5.1, 4.5.4.3, site visit
Findings	Permanent sampling stations were established and marked by rocks and the GPS point was taken. Site visit confirmed GPS coordinates were reasonably close, but without the individual who sampled the sites, the precise station location is unlikely to be found. Auditors also noted the difficulty of permanent plot monumentation due to the local conditions. For this reason, establishment of precise and accurate GPS points is essential, and given the small plot size chosen by the proponent. Auditors were unable to locate in project documentation standard operating procedures (SOPs) for sample stations using GPS and which adhere to the intent of this requirement.
NCR/CL/OFI	NCR: Please explain in project documentation specific methods for plot establishment in the absence of clear plot center monumentation methods as noted in the finding. In response to this request, please state the location in project documentation of the requested additions.
Response from Project Proponent	All smapling stations have two photos with GPS cameras taken, one looking northward and the other southward. This step is mentioned in the section 8.1.2 of the PD.
Findings	The following text was added to the end of section 8.1.2 of NKCP PD, v2, dated 12 April 2017: "To reduce the risk that sampling stations cannot be relocated, all sampling stations were photographed with a GPS digital camera (images available upon request) from both a northward and southward view." This is a reasonable solution, given the difficulty of marking plot centers in this region. Item addressed, pending review of method in the field.
NCR/CL/OFI	
Response from Project Proponent	All sampling stations have two photos with GPS cameras taken, one looking northward and the other southward. This step is mentioned in the section 8.1.2 of the PD.
Findings	This response was ad+A61:P61ded again, without regard to the clearing of the item, resulting in it being checked again. Section 8.1.2 of v2.1 of the PD was updated to include the described method for documenting the plot locations. The same section includes the updated method for BD samples. Site visit demonstrated plots can be located with reasonable accuracy. Item closed.

Item Number	38
VM0032 Version 1 - 16 July 2015 (Section)	8.1.2.1. Number of Sampling Stations
VM0032 Version 1 - 16 July 2015 (Description)	The total number of sampling stations, n, for the project area must be determined by using CDM A/R Methodological Tool Calculation of the number of sample plots for measurements within A/R CDM project activities. As soil is typically sampled from three or more pooled 5-10 cm diameter cores at a station and therefore from a small total area (< 0.05 m2), there are potentially a large number of potential sampling sites in even the smallest project area (< 1 km2). Consequently, the total number of sampling stations, according to the CDM tool, is largely insensitive to the total area of the project for a measured approach as shown in see Figure. (see Figure 1 in the methodology- Estimate Number of Sampling Stations - page 20).
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	There is no reason to believe the number of sampling plots was not determined using this tool.
Findings	It does not appear that this required tool was implemented for the selection. Auditors were unable to locate evidence to suggest that the number of estimated sampling stations was derived using the CDM-A/R Methodological Tool - "Calculation of the number of sample plots for measurements within A/R CDM project activities" (Version 02.1.0) Please refer to the CDM A/R tool for all detailed requirements.
NCR/CL/OFI	NCR: Please fully apply the CDM-A/R Methodological Tool - "Calculation of the number of sample plots for measurements within A/R CDM project activities" (Version 02.1.0) and provide transparent results sufficient for the auditors to confirm the tool was correctly applied.
Response from Project Proponent	The number of sampling stations for a **Modeling Approach i**s to be determined by a regression sample size calculator. The detailed procedures for doing this are described in section 4.5.1
Findings	See findings for line 1 in this checklist. It appears there is an error in the way the methodology was written, requiring two different methods for determining the number of sample stations.
NCR/CL/OFI	
Response from Project Proponent	The number of sampling stations for a Modeling Approach is to be determined by a regression sample size calculator. The detailed procedures for doing this are described in section 4.5.1. The cluster analysis is provided in worksheet "DatabaseCluster" in the excel file "NRT Soil Carbon Data and Calculations v2"
Findings	The project proponent is correct. The modeling approach is used, and the CDM tool is not necessary. Item addressed.
Item Number	39

VM0032 Version 1 - 16 July 2015 (Section)	8.1.2.2. Stratification
VM0032 Version 1 - 16 July 2015 (Description)	The primary goal of the distribution of stations must be to reduce variability and increase representation of different SOC values in the project area.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NKCP VCS CCB Project Description v1.0 draft 4.docx
Findings	A map was included in Section 4.5.1 of the PD to display the final stratification. However, this map was not formatted properly to fit the page and VCS template. This map is also difficult to read due to size, lacks a scale for the reader and the legend could be formatted better. Also, the areas of individual strata could not be found in the PD, summing to the total project area.
NCR/CL/OFI	CL: Please address the findings and reformat the stratification map in the PD and report individual strata areas to sum to the total project area per the requirement.
Response from Project Proponent	Mapping of polygons is nearly complete and will be by the time of the site visit. Responses 2018-02-21: "These findings are all addressed by Fig. 9 in the PD, section 4.5.1. Individual strata areas are presented in "
Findings	Soil map in section 4.5.1 is more complete. Section 5.4.4, table 13, includes areas of strata, but the origin of these area measurements was not checked with new shapefiles. Pending check of recently received shapefiles, and assurance that GIS work is complete.
NCR/CL/OFI	
Response from Project Proponent	These findings are all addressed by Fig. 9 in the PD, section 4.5.1. Individual strata areas are presented in
Findings	Figure 9 is much improved over the map in version 1 of the PD. Individual strata areas were not found in the PD, but are included in the 'Project Area By Stratum' tab of the NRTSoil Carbon Data and Calculations v2.xlsx spreadsheet. Note the correctness of stratum areas is pending item 74 where the methods for computing hectares are not in line with industry standards.
NCR/CL/OFI	CL: Please include the areas of the strata in the PD. Still no strata areas in V2.1.2 of the PD.
Response from Project Proponent	
Findings	No response was received for this item. However, it is pending findings elsewhere related to project geospatial boundaries.
Item Number	40
VM0032 Version 1 - 16 July 2015 (Section)	8.1.2.2. Stratification

VM0032 Version 1 - 16 July 2015 (Description)	For projects using a modeled approach, the objective is to demonstrate that the chosen soil carbon model can predict SOC stocks or changes in SOC stocks at each of a large number of sampling stations that differ in key factors, such as climate soil type, past management, and vegetation.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NKCP VCS CCB Project Description v1.0 draft 4.docx, Site visit
Findings	The proponent has established that sandy loam and black cotton are the main soil types used for SOC stock quantification. Lava plateau and rocky hillslopes/mountains are also listed as strata. The two main soil types were applied against the 14 Conservancies which make up the project area. Based on the description of stratification in Section 4.5.1 of the PD, the following factors helped determine strata; soil texture and drainability, measurable SOC, and geography according to Conservancy. These methods were not entirely inclusive of the key factors noted in the requirement for prediction of SOC flux and could have incorporated vegetation and management practices. While this is indeed the objective, that objective could not be met, because bulk density samples were taken and processed incorrectly.
NCR/CL/OFI	NCR: Please address the findings and justify the project key factors for capturing variability, noting their suitability to model SOC prediction. As needed, please adjust characteristics of sample station selection to incorporate additional key factors and improve predictive model capabilities.
Response from Project Proponent	Factors that incorpoated general geographic variability, soil texture and grazing history (management type) are now explicitly incorporated in strata. Rainfall islargely captured by stratifying by Conservancy. Lignin and cellulose content did not vary geographically and was driven largely by the dominance of annual plants as forage. Fires have been almost entirely absent (see section 4.2 for evidence) and thus did not vary geographically. Thuis, the choice of Conservancy, management, and soil texture (soil class polygons) capture the vst majority of the variation in the parameters of the SNAP model within the project area
Findings	Section 4.5.1 of the NKCP PD, v2, dated 12 April 2017, includes a more detailed discussion of stratification, including preliminary sampling that showed two of the management criteria originally chosen provided no reduction in variability. Climate is addressed roughly by using conservancies as a stratification criteria. Soil criteria used is explained and is based on reasonable assumptions regarding texture and mineralogy. Item closed.
NCR/CL/OFI	

Response from Project Proponent	Factors that incorpoated general geographic variability, soil texture and grazing history (management type) are now explicitly incorporated in strata. Rainfall islargely captured by stratifying by Conservancy. Lignin and cellulose content did not vary geographically and was driven largely by the dominance of annual plants as forage. Fires have been almost entirely absent (see section 4.2 for evidence) and thus did not vary geographically. Thuis, the choice of Conservancy, management, and soil texture (soil class polygons) capture the vst majority of the variation in the parameters of the SNAP model within the project area
Findings	This response was added again, without regard to the clearing of the item, resulting in it being checked again. Section 4.5.1 of v2.1 of the PD includes a more robust discussion of stratification, using the pertinent soil properties, climate and management in the process. Item closed.
Item Number	41
VM0032 Version 1 - 16 July 2015 (Section)	8.1.2.2. Stratification
VM0032 Version 1 - 16 July 2015 (Description)	Sampling stations must be selected to encompass as much of the variability in these factors as possible in order to test that the model is appropriate for use in the project area (see Section 8.1.3.3 of the methodology)
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 4.5.4.3, 4.5.1, site visit.
Findings	The project proponent chose past management and two general soil types (black cotton and sandy loam) for stratification. This may be adequate. However, sampling stations were not chosen randomly within strata, or systematically with a random starting point. Reselection of sampling stations and resampling project area is required. Please see finding above.
NCR/CL/OFI	
Response from Project Proponent	Details of cluster analysis and stratification method, along with maps of strata and location of sample points are presented in section 4.5.1 of the PD, including Figs 9 and 11. The cluster analysis is provided in worksheet "DatabaseCluster" in the excel file "NRT Soil Carbon Data and Calculations v2"
Findings	The response and supporting material do not satisfy the finding. Verifiers are concerned with the unbiased allocation of sampling points within the Project Area. A universal concept of statistical sampling is the allocation of sampling units in an unbiased manner. As the PD currently stands, the auditors cannot be reasonably assured of the unbiased allocation of sampling points. Further clarification is requested on how sampling points were placed in an unbiased manner.

NCR/CL/OFI	CL: Please clarify how the sampling points within strata were placed in an unbiased manner.
Response from Project Proponent	
Findings	No response was received for this finding.
NCR/CL/OFI	CL: Please clarify how the sampling points within strata were placed in an unbiased manner.
Response from Project Proponent	In section 4.5.1 of the PD Explicit mention that sampling points were distributed randomly within polygons of different soil classes (sandy loam, black, and clay loam) and of different management (Core, Buffer, Settlement) in ach Conservancy.
Findings	Version 2.1.4 of the PD, received on 10 May 2019, include the steps in locating sampling stations. It states that random locations were determined through a random point generator, QGIS 2.12.3. After ensuring sufficient samples in buffer and core areas, stations were assigned randomly throughout the project area. Black and clay soils were said to be underrepresented, and additional random plots were chosen within the boundaries of those soil polygons. Item closed.
Item Number	42
VM0032 Version 1 - 16 July 2015 (Section)	8.1.2.2. Stratification
VM0032 Version 1 - 16 July 2015 (Description)	The sample size must be determined using an online calculator or a power analysis in any standard statistics program. As an example, to achieve the desired model accuracy of R2 > 0.80 (see Section 8.1.3.3) and an uncertainty of less than 0.08, a total of 120 samples would be needed from across the full variation in SOC within the project area.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NKCP VCS CCB Project Description v1.0 draft 4.docx, Site visit
Findings	Auditors were unable to locate analysis for sample size determination. Further, no discussion of sample size based on variability of project area was found in project reporting documentation.
NCR/CL/OFI	NCR: Please provide analysis of the number of sampling stations established based on soil variability per this requirement.
Response from Project Proponent	This is now detailed in section 4.5.1. See also response to item 2 above
Findings	Section 4.5.1 of the NKCP PD, v2, dated 12 April 2017, includes a discussion of the variables that were inputted into an online calculator to determine sample size, and included a link to the calculator. Item addressed.
NCR/CL/OFI	
Response from Project Proponent	This is now detailed in section 4.5.1. See also response to item 2 above

Findings	This response was added again, without regard to the clearing of the item, resulting in it being checked again. Section 4.5.1 of V2.1 of the PD Discusses the use of a free online statistics calculator, with link that was active at the time of this review. Item addressed.
Item Number	43
VM0032 Version 1 - 16 July 2015 (Section)	8.1.3. Calculation of Baseline Emissions
VM0032 Version 1 - 16 July 2015 (Description)	The methodology applies to Tier 2 approaches, as outlined in the IPCC 2006 Guidelines for National Greenhouse Gas Inventories Chapter 10, Emissions From Livestock and Dung Management but with local input data. Calculations are based on estimating daily methane emissions as a function of the body weight (kg) of each major animal category (Figure 5: Daily methane emissions data), and then multiplied by the number of animals in each animal category and 365 days in a year. Emissions from all categories may then be summed to provide the total annual methane emissions for the project area. Domestic livestock grazing animals of category c must be classified as one of three animal types: ruminants (sheep, goats, cattle, buffalo, and camelids (ie, camels, alpacas, guanacos, llamas), equids (donkeys, horses) or pigs. *(See equation 1 of the methodology - page 24)*
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 4.5.3.1 of the PDD and monitoring report
Findings	The PD illustrates BEM (baseline emissions from grazers) was calculated in this way. However auditors were unable to locate quantification of BEM Equation 1. BEM is an annual value, which auditors presume to be computed for the 10 year baseline period.
NCR/CL/OFI	CL: Please direct auditors to the location of quantification of Equation 1, please supply evidence as needed of this calculation.
Response from Project Proponent	Equation 1 requires livestock numbers available from household surveys. These are available in the Excel file "historical_livestock_numbers_combined_20Nov2014 version2". Correct harmonic means are now reported in Table 11 in the PD and MR
Findings	Verifiers reviewed calculations for Equation 1 found in tab "NRT Methane Baseline" of "NKCP methane calculations 2017.xlsx." It appears that the equation is not computed correctly as written in VM0032 and a discrepancy was noted where categories of animals were not ordered correctly, VM0032 specifies ruminants species. Please also see finding under Section 6 (3) regarding number of surveys from the NRT livestock specific survey.
NCR/CL/OFI	CL: Please address the findings and correct the noted discrepancies to adhere to requirements for Equation 1. In addition, please see Equation 2 finding.

Response from Project Proponent	The proper coefficient for donkeys, 0.18 was substituted for 0.66 the coefficient for ruminants in the baseline calculation
Findings	The worksheet "NKCP methane calculations 2017.xlsx" was received on 22 March 2019 and reviewed, including reporting in the PD (Table 9 - Baseline livestock animal censuses and baseline methane emissions). The verifiers noted a discrepancy in calculation methods between equation 1 steps and the instructions under Table 5 of VM0032. Other discrepancies noted: a)The weight for donkeys differs between project and baseline cases b) For the baseline and project cases, an incorrect value for parameter DMEF(Wc) appears to have been used for shoats, verifiers understand that shoats are pigs c) Incorrect uncertainty percents were applied to shoats and donkeys
NCR/CL/OFI	CL: Please address the findings and fix the errors related to donkey weight and parameter DMEF(Wc) as noted in the finding.
Response from Project Proponent	a) The donkey weights are the same (225 kg) for both the baseline and project scenarios. b) shoats in this case are sheep and goats combined, since field livestock counts can usually not differentia Ute these. Therefore the DMEc calculations for shoats (as ruminants) is correct. c) All the uncertainty calculations are correct using Eq 27 and 29 from the methodology after applying the correct mass for donkeys and noting that equations for shoats (sheep and goats) were already correct. Uncertainty calculations for project methane uncertainty are correct based on useage of arithmetic mean and equation 37 of VM0032
Findings	The worksheet "NKCP methane calculations 2019 v2.xlsx" was reviewed in response to the finding. -Donkey weights have been fixed - parameter DMEF(Wc) is correct All calculations confirmed. The item is addressed.
Item Number	44
VM0032 Version 1 - 16 July 2015 (Section)	8.1.3. Calculation of Baseline Emissions
VM0032 Version 1 - 16 July 2015 (Description)	Further, DMEF(Wc) is the daily emission factor (liters CH4 / day) as a function of animal weight for animal category c. These values must be determined using the relevant allometric equations in Table 4 of the methodology. *(see table 4 of methodology for allometric equations).*
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 4.5.3.1 of the PDD and monitoring report
Findings	The equations in Table 4 were used. No source for animal weights mentioned. Please include source for animal weights.
NCR/CL/OFI	CL: Please see comments in the finding.
Response from Project Proponent	The source of animal weights is given as a footnote to Table 8. This was unfortunately chopped off in copying the table previously

Findings	Source for animal weights is now given in section 4.5.3.1 as Franz, et al, 2010. Item addressed.
Item Number	45
VM0032 Version 1 - 16 July 2015 (Section)	8.1.3. Calculation of Baseline Emissions
VM0032 Version 1 - 16 July 2015 (Description)	BNc, is the harmonic mean number of animals of each category during the 10 years prior to the project start date, calculated as below. The harmonic mean conservatively weights lower values of methane emissions in a sample. This must be calculated using equation (2). The harmonic mean BNc for n censuses of Nc,i animals in each category c during census i is given by: *(see equation 2 from the methodology- page 25)*
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 4.5.4.5
Findings	A modified version of Equation 2 was presented in the PD to calculate the harmonic mean number of animals and may be a remnant from an earlier iteration of the methodology. It does not appear this calculation was performed correctly in "NRT HH Livestock Survey Nov 2014.xlsx."
NCR/CL/OFI	NCR: Please present the correct version of Equation 2 in the PD and compute BNc following the methodology. In the response, please refer to location of the calculation in project worksheets.
Response from Project Proponent	Correct harmonic means are culculated in Table 11 the PD and MR
Findings	Determination of parameter BNc was reviewed in worksheet "NKCP methane calculations 2017.xlsx." It appears that the equation is not computed correctly as written in VM0032 and discrepancies were noted for a) determination of BNc is incorrect as it breaks out K (categories of grazing animals, eg species, gender, age) where Equation 2 calls for parameter c (category of grazing animals) and b) Current Harmonic mean is based on 6 instead of 10 years as required. It was noted that the results of Equation 2 were transcribed into table 11 of the PD. Please also see finding under Section 6 (3) regarding number of surveys from the NRT livestock specific survey. In addition, please see Equation 1 finding.
NCR/CL/OFI	CL: Please address the findings and correct the noted discrepancies to adhere to requirements for Equation 2.

Response from Project Proponent	The formula for harmonic mean in eq 2 is incorrect. This has been added to Errata and Clarifications so that the formula matches that used by the spreadsheet and both are correct. BNc is calculated correctly in the charts as the harmonic mean (see item 16 for how equation 4 was corrected). Errata and Clarifications to VM0032 now clairify that the censuses have to be at least four counts over ten years with rougjhly evenly spaced intervals. Counts for all 10 years are not required to align with requirement for vegetation trends . If there are k animal categories, in this case 4., then equation 1 is correct and compatible with equation 2; equation 1 just multiples emissions per animal times estimated number of animals and then sums up over all the animal categories
Findings	Validation team notes that erratum #5 pertains to VM0032 eq. 2 and was revised in the first term of the equation and is now correct. The harmonic mean for baseline animal censuses was found to be correctly computed. The item is addressed following resolution of upstream issues in equation 1.
Item Number	46
VM0032 Version 1 - 16 July 2015 (Section)	8.1.3.3. Baseline Changes in SOC density
VM0032 Version 1 - 16 July 2015 (Description)	One or more of these or other candidate models must be assessed for accuracy independently, (ie, with data other than that used to construct the model), and also tested to demonstrate it is appropriate for use in the project area by showing its ability to predict initial carbon stocks in different subareas (strata) within the project area (see below).
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 5.4.3.1; NRT Soil Carbon Data and Calculations v2.xlsx
Findings	While the SNAP model performed largely within methodology parameters, it failed the test for the confidence interval of the intercept. It may pass with new data.
NCR/CL/OFI	NCR: Please address the findings and fix the model to pass per this methodology requirement.
Response from Project Proponent	Adam's model test with Century - abstratc and highlights insert into appropriate section
Findings	SNAP model is now within parameters, according to NKCP PD, v2.1.2 Figure 16.
NCR/CL/OFI	
Response from Project Proponent	The model now passes, see p.60 of the PD
Findings	Test for the C.I. of the intercept was passed, using new data. However, this finding remains pending as there are outstanding issues with SNAP model, including for instance observed SOC values.
Item Number	47

VM0032 Version 1 - 16 July 2015 (Section)	8.1.3.3. Baseline Changes in SOC density
VM0032 Version 1 - 16 July 2015 (Description)	This analysis assumes that past practices have been in place long enough for SOC to approach equilibrium. Thus the soil carbon model must be able to predict this equilibrium for strata in the project that have experienced similar management activities for 20 years or more.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 4.5.4.4
Findings	The PDD states the model was back-casted 10 years, while the methodology requires 20 years.
NCR/CL/OFI	NCR: Please address the findings and back-cast the appropriate temporal period.
Response from Project Proponent	This is not correct. Section 8.1.3.2 states *Projects applying a modeled approach, must apply the maximum SOC in the previous 10 years as the baseline SOC stocks*.
Findings	The project proponent is correct. There is no requirement to back-cast 20 years. NCR withdrawn.
NCR/CL/OFI	
Response from Project Proponent	The emthodology requires only 10 years, per Verra protocol - see 8.1.3.4. Generating baseline SOC with a soil carbon model on page 29 of the Methdology
Findings	This response was added again, without regard to the clearing of the item, resulting in it being checked again. Section 8.1.3.4 of the methodology indeed requires only 10 years for the modeled approach. NCR withdrawn. Item closed.
Item Number	48
VM0032 Version 1 - 16 July 2015 (Section)	8.1.3.3. Baseline Changes in SOC density
VM0032 Version 1 - 16 July 2015 (Description)	A regression line is fitted to a scatter-plot of model-predicted SOC (x-axis) vs. measured SOC from a large number permanent sampling stations (see section 8.1.2.2). Variation in conditions and management activities across strata may be used as the source of different soil carbon model parameter inputs. The model must generate a coefficient of determination R2 > 0.80 across all strata. The slope of the regression line must have a 95 percent confidence interval that overlaps 1 and the 95 percent confidence interval of the intercept must overlap zero. If these criteria cannot be met with any available models, then the project proponents must use the measured approach.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 4.5.4.3 of the monitoring report.

Findings	The model's R2 for this project area is 0.888. The slope is 0.9996 and the 95% confidence interval overlaps 1. The confidence interval does not overlap zero. If subsequent model runs with new data do not improve this situation, another model or the measured approach must be used.
NCR/CL/OFI	NCR: Please address the findings.
Response from Project Proponent	This is now corrected following the correct measurement of soil bulk density see Fig. 12. and surroundng text
Findings	The model now falls within required parameters.
NCR/CL/OFI	
Response from Project Proponent	In the PD and MR, a new regression line has been generated using the revised SOC values after updating soil bulk density calculations. This revised regression has an intercept whose confidence interval overlaps zer. See section
Findings	The new regression curve's confidence interval overlaps zero. Please see Section 6: Baseline Scenario parts 6, 7 of the review. This item is pending the larger SNAP related findings.
Item Number	49
VM0032 Version 1 - 16 July 2015 (Section)	8.1.3.3. Baseline Changes in SOC density
VM0032 Version 1 - 16 July 2015 (Description)	Bias must be determined by evaluating the percent bias of a simulation (carbon model) relative to observed data. *(see equation 5 in the methodology-[ag 28)*
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 4.5.4.3 of the monitoring report.
Findings	Equation 5 was presented in the PD as the method to determine model bias. Please see find directly below.
NCR/CL/OFI	
Response from Project Proponent	The equation (15) used for calculating bias is presented in section 5.4.3.1, page 60 of the PD. Bias calculations are presented in column AU of worksheet "Measurements" of excel file "NRT Soil and Data Calculations v2"
Findings	Equation 5 of the methodology is Equation 15 of the PD and Equation 8 of the MIR. See findings below. Please see Section 6: Baseline Scenario parts 6, 7 of the review. This item is pending the larger SNAP related findings.
Item Number	50
VM0032 Version 1 - 16 July 2015 (Section)	8.1.3.3. Baseline Changes in SOC density

VM0032 Version 1 - 16 July 2015 (Description)	Bias of the model chosen for this methodology must be between -20% and +20%.The criteria of R2 > 0.80, slope = 1 and intercept = 0 should ensure that -20% < MBIAS < 20% [37]. In the case that significant bias is found and emission reductions are over-predicted— a subset of observed data can be used to adjust model parameters and fit the model to data, and then the model can be re-tested with the remaining data.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 4.5.4.3 of the monitoring report.
Findings	The PD presents a value for MBIAS = 19.4%, within the +/- 20% specified by the methodology. Auditors were unable to find the calculations for this value and to confirm correct application of Equation 5.
NCR/CL/OFI	CL: Please provide transparent calculations for the determination of MBIAS following Equation 5.
Response from Project Proponent	MBIAS calculations are corrected and reported for each stratum in column AU of the "Measurements" worksheet in the Excel file "NRT soil Data and Calculations v2"
Findings	Please see Section 6: Baseline Scenario parts 6, 7 of the review. Please see Section 6: Baseline Scenario parts 6, 7 of the review. This item is pending the larger SNAP related findings.
Item Number	51
VM0032 Version 1 - 16 July 2015 (Section)	8.1.3.3. Baseline Changes in SOC density
VM0032 Version 1 - 16 July 2015 (Description)	In addition the 95 percent confidence interval for predicted mean SOC, derived from Monte Carlo simulations, must overlap with that of SOC measured at sampling stations in the same stratum. If, for certain strata, the 95 percent confidence intervals do not overlap, then the soil carbon model must be calibrated for that stratum by adjusting one or more parameters until 95 percent confidence intervals do overlap.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	
Findings	This was not demonstrated in the PDD or monitoring report. Please show that confidence interval of Monte Carlo runs of the model overlap all measured samples.
NCR/CL/OFI	NCR: Please address the findings and provide the results for this analysis. Please also present the results in the appropriate section of project documentation.
Response from Project Proponent	Monte Carlo estimated SOC and observed SOC for each stratum are shown in Table 10 in the PD and Table 13 in the MR of section 5.4.4

Findings	Table 10 in the MIR and Table 13 of the PD shows the estimated and observed SOC, and whether sampling stations within a stratum is within the 95% conf. intervals. [A few are not within. What was changed?] Please see Section 6: Baseline Scenario parts 6, 7 of the review. This item is pending the larger SNAP related findings.
Item Number	52
VM0032 Version 1 - 16 July 2015 (Section)	8.1.3.3. Baseline Changes in SOC density
VM0032 Version 1 - 16 July 2015 (Description)	Again, the model should predict observed change in soil carbon with R2 > 0.80 and RMSR < 0.7. If the selected model fails to successfully predict soil carbon changes according to these criteria, then the project proponent can modify the model, or re-calibrate it. Re-calibration can occur by adjusting parameter inputs or coefficients in the model's functions in a reasonable way (justified by peer-reviewed scientific literature) to achieve successful prediction of changes in SOC during the calibration period.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 8.3.1
Findings	While the monitoring report states that SOC density will be remeasured and compared to SNAP model predictions, and re-calibrated, if necessary, there is no discussion and no SOP for re-calibration.
NCR/CL/OFI	NCR - In the PD please describe the procedure for model re-calibration.
Response from Project Proponent	Model re-validation will consist of a review of the input data used in the original predictions of baseline SOC. Modifications of input data will be considered first. A second step is to evaluate key functions in the model, such as the relationship between rainfall and productivity, root biomass, and microbial carbon demand. Coefficients (constants) in these functions may be altered one at a time. Validation of any model modifications will be conducted with a subset of 100 rrandomly selected data from permanent sampling stations at the time of model evaluatio and from measures at the start of the project (2012 and 2016). Validation of any final modified model will be condicted with the remaining permanent sampling station data. This is now in section 4.5.5 of the PD.
Findings	The described text was added to section 4.5.4.4 of the PD. Item addressed.
Item Number	53
VM0032 Version 1 - 16 July 2015 (Section)	8.1.3.4. Generating baseline SOC with a soil carbon model

VM0032 Version 1 - 16 July 2015 (Description)	Projects applying a modeled approach, must apply the maximum SOC in the previous 10 years as the baseline SOC stocks. For most projects, this will not have been measured, so the soil carbon model of choice must be used to "back cast," that is estimate SOC that would have occurred during the baseline period. *(see Figure 7 of the methodology for an Example of back-casting SOC change from current SOC-page 30 - Figure 7 provides an example of back casting SOC change from current SOC, based on knowledge of past management activities and environmental conditions. The blue line is predicted SOC of previous years (x-axis). This example shows what baseline SOC would be 10 years prior (5549 g/m2 at year 10) rather than current (5192 g/m2 at year 1), thus increasing conservatism in the estimate of baseline SOC.)*
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	file: NRT summary soil data.xls, section 4.5.4.4 of the PDD and monitoring report
Findings	Spreadsheet shows that the SNAP model was used to backcast to find the highest SOC level over the previous 10 years. All or most sampling stations had greater amounts of SOC in previous years, according to the model. The baselines should be reported in the PDD and monitoring reports. PDD and MR refer the reader to section 4.5.3, which is actually about methane emissions from animals. Backcasting will have to be redone once the data is corrected and the model tests are passed.
NCR/CL/OFI	NCR - Please report baseline SOC in the PDD and monitoring reports. Address the reference to section 4.5.3, which seems to be an error.
Response from Project Proponent	Baseline SOC is in new Table 10 in the PD and 13 in the MR
Findings	Baseline SOC is reported in table 13 of the PD and table 10 of the monitoring report. Item addressed after calculation check.
Item Number	54
VM0032 Version 1 - 16 July 2015 (Section)	8.1.3.4. Generating baseline SOC with a soil carbon model
VM0032 Version 1 - 16 July 2015 (Description)	Maximum baseline MSOCm,j,0 for each station in each stratum must be estimated by back casting the chosen model (Figure 7: Example of Back-Casting SOC Change from Current SOC) with model input parameters associated with the soil type, plant species, climate and management activity of that stratum.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD; NRT Calc worksheet
Findings	See finding directly above.
NCR/CL/OFI	NCR - Please report baseline SOC in the PDD and monitoring reports.
Response from Project Proponent	Baseline SOC per strata is in new Table 13 in PD and MR
Findings	Baseline SOC is reported in table 13 of the PD and table 10 of the monitoring report. Item addressed.

Item Number	55
VM0032 Version 1 - 16 July 2015 (Section)	8.2.1 Project Methane Emissions from Grazing Animals (PEMt)
VM0032 Version 1 - 16 July 2015 (Description)	However, whether or not methane emissions from livestock are reduced, calculations must be based on project data from animal counts or censuses and emission factor data based on project area-applicable body weight of each category from the equations in Table 4? and Equation (1) (Section 8.1.3.1). *(See equation 8 on page 31 of the methodology for calculation of: Project emissions of CH4 from grazing animals at year t (tCO2e)) - page 31*
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 5.4.2 of the PDD and MR; Section 5.4.2 of the PDD and MR; NKCP methane calculations 2019 v2.3.2 July 17 2019.xlsx
Findings	The PD illustrates PEM (project emissions from grazers) was calculated in this way. However auditors were unable to locate quantification of PEM Equation 8.
NCR/CL/OFI	NCR: Please provide spreadsheet used to calculate PEM.
Response from Project Proponent	PEM is calculated in section 5.4.2 using equation 16 in the PD and 15 in the MR and summarized in Table 12. Livestock numbers for project scenario years 2013-2016 were determined from grazing coordinator surveys and direct counts.
Findings	PEM is calculated in sections 5.4.2 of both documents. Equation 8 of the methodology is equation 14 of the PD and equation 15 of the monitoring report. PEM is summarized in table 12 of the PD and table 13 of the monitoring report. Calculations were presented in workbook NKCP methane calculations 2017.xlsx, NRT Methane Project tab. The two tables do not agree with each other. The one in the PD excludes the year 2016, as does the NRT methane calculations workbook, while the monitoring report includes 2016. Calculations that include 2016 were not provided to the auditors. 23 February 2018.
NCR/CL/OFI	NCR: Please provide all calculations including 2016, in a spreadsheet. Please ensure the PD and MR documents agree.
Response from Project Proponent	All the spreadsheets are updated and agree between PD and MR

Findings	The verification team reviewed the newly submitted calculation worksheet (NRT Soil Carbon Data and Removal Calculations v4.xlsx, received 05 March 2019) and methane calculation worksheet (NKCP methane calculations 2017.xlsx, received 22 March 2019). Project case animal methane is not included in final emissions calculations and the project has stated in the PD Section 4.2, "The project holds no expectations that livestock numbers will change either positively or negatively as a consequence of project activities." Regardless of whether project activities reduce livestock numbers or not, PEMt is a required parameter. -the harmonic mean is incorrectly used and reported in the PD Table 10 -PEMt is an annual year t value but is computed for all monitoring years -year 2013 is missing
NCR/CL/OFI	CL: Please address the findings and fix the noted discrepancies with PEMt.
Response from Project Proponent	(c)The arithmetic mean (and proper calculation of SE and uncertainty) is now reported in the column labeled "Mean" in the tab "…." rather than the harmonic mean, as specified by VM0032. The net project emissions are included in the tab;e of ex ante emissions and in the monitoring report . Note The equations (formerly 13, now 13 and 14) used in the PD have been corrected to match those prescribed in the methodology (Eq (19).
Findings	The audit team reviewed the new project case methane emission calculations provided in response to the finding. a) PEMt is an annual year t value and is computed for all monitoring years and reported identical for all monitored years. Audit team understands that parameter PNc,t is the arithmetic mean of one or more years' animal censuses during the verification period, Table 6 in VM0032 shows multiple years and an arithmetic mean for the verification period. b) Related to a), year 2013 is missing from the arithmetic mean. This was discussed via phone with the proponent and it is permissible to apply 2014 values to 2013 provided there is justification in reporting documentation c) Per animal uncertainty is incorrect for donkeys (both BEM and PEM) from Table 4 in VM0032
Item Number	56
VM0032 Version 1 - 16 July 2015 (Section)	8.2.3. Project Changes in SOC Density
VM0032 Version 1 - 16 July 2015 (Description)	The model must also calculate the number of years D to reach this equilibrium.

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NRT summary soil data.xls, exante removal calculations tab, column I reports D values for each station.
Findings	The NRT Summary Soils Data excel file includes D, the number of years to equilibrium, in column I of the ExAnte Removal Calculations Tab, but the source of D is not apparent.
NCR/CL/OFI	CL - Please point out how D, from column I of the ExAnte Removal Calculations Tab is derived.
Response from Project Proponent	Time to Equilibrium is now shown in column BB of the worksheet "Calculating Removals" in the excel file "NRT Carbon Data and Calculations v2" The number is a direct output of the SNAP soil carbon model in the Excel file "Public model v2 NRT calcs" and is based on estimating the time required to reach equilibrium from the average annual increment in soil carbon.
Findings	Column BB of the Calculating Removals spreadsheet in file NRT Carbon Data and Calculations v2. xlsx includes the time to equilibrium, which ranges between about 105 years to about 193 years, across the project area. However, it is still not clear how these times were calculated. The formulas in the spreadsheet for Column BB is the number 57956 divided by the mean annual rainfall (column AG). 8 March 2018
NCR/CL/OFI	CL: Please exlain the calculation of the number 57956. Include units.
Response from Project Proponent	Time to Equilibrium is a Public SNAP model ouput based on the calculated time required to approach 99% of predicted project scenario equilibrium from baseline SOC. However it is highly tedious to do this calculation across 235 sampling stations. Time to equilibrium can be shown to be primarily function of rainfall, and the function used here is the one fitted to the simulation data -see worksheet Carbon Model in excel file SNAP Public Model v2 NRT calcs.xls. Time to Equilibrium is thus estimated for each sampling station using this equation.
Findings	The regression provided on the SOC model tab explains the origin of the quantity in the previous version of the worksheet. Item closed.
Item Number	57
VM0032 Version 1 - 16 July 2015 (Section)	8.2.3. Project Changes in SOC Density
VM0032 Version 1 - 16 July 2015 (Description)	Carbon typically accrues in response to management changes with decreasing increments over time as equilibrium is approached. Thus conservatively, the annual increment in SOC is determined by the difference in SOC between the conservative baseline maximum from 10 years prior to the project start (MSOCm,j,0) and project modeled equilibrium (PSOCeqm,j,t) divided by the time necessary to achieve project equilibrium (D). The project equilibrium must be determined assuming that project activities will be implemented. Thus, multiplying the annual increment in SOC (tons/ha), by the conversion of C to CO2 44/12 yields CO2e at that station. *(See equation 13 on page 34 of the methodology for calculation of:*

	Annual project removals due to changes in SOC stocks in stratum m in year t (tCO2e /ha))
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NRT summary soil data.xls, exante removal calculations tab, columns F, D and H.
Findings	The spreadsheet shows that the calculations described were used. To be redone when soils are re-sampled.
NCR/CL/OFI	Calculations have been redone in excel file "NRT Soils and Data Calculations v2, " worksheet "Calculating Removals" Column BA based on revised soil bulk densities.
Response from Project Proponent	Equation 13 is used in the calculation of the annual removals listed in column BC. The item is addressed.
Item Number	58
VM0032 Version 1 - 16 July 2015 (Section)	8.3.1.1 Leakage emissions from displaced livestock.
VM0032 Version 1 - 16 July 2015 (Description)	Increased GHG emissions from the displacement of livestock outside the project area is limited by the applicability condition that 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 project proponent must prevent incursion of livestock from outside the project area or excursion of livestock from inside the project area through fencing, patrolling by game scouts, or other such enforcement of project area boundaries.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 4.2 and 5.2 of the PDD and MR.
Findings	The PDD implies that grazing coordinators and scouts will be used to enforce project boundaries. Movement of livestock outside the project area is not expected. Movement inside will be negotiated by tribal elders. Please provide a report summarizing the enforcement efforts/patrols of the coordinators and scouts.
NCR/CL/OFI	CL
Response from Project Proponent	NRT has no such summary report, but the individual reports are archived and can be made available **(response recevied 2017-04-21 "090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx").**

Findings	Pending review of archived reports.
NCR/CL/OFI	CL: Please provide the reports that you indicated would be available.
Response from Project Proponent	This is now available as the excel file "leakage livestock numbers" (response recevived 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx")
Findings	The file Leakage livestock numbers.xlsx was provided. It includes lists of numbers of livestock on the project area and off the project area, for the different conservancies. The tallies appear to be general estimations rather than actual counts.
NCR/CL/OFI	CL: Please provide examples of archived reports.
Response from Project Proponent	506 grazing reports are available at https://www.dropbox.com/home/Carbon%20project%20documents/livestock%20movement%20maps
Findings	The project proponent supplied several archived grazing reports from each conservancy. Reports include information on participation rate (which is high), security, conflicts, etc. Item closed.
Item Number	59
VM0032 Version 1 - 16 July 2015 (Section)	8.3.1.1 Leakage emissions from displaced livestock.
VM0032 Version 1 - 16 July 2015 (Description)	The project proponent is expected to control grazing animal numbers inside the project area and account for the number of animals involved and duration of any movement of livestock to outside the project area.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 4.2 and 5.2 of the PDD and MR.
Findings	This will be done using scouts who will report animal movements. Since strong control of the project boundaries is an applicability condition, findings of the coordinators and scouts should be compiled, summarized and reported.
NCR/CL/OFI	CL
Response from Project Proponent	A summary of the reports as related to movement of livestock off the Conservancy and off the project area is presented in the leakage calculations for 2014 and 2015. See Excel file "Leakage livestock numbers.xls' **(response recevied from Mark 2017-04-21 "090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx").**
Findings	Counts of livestock are included in the spreadsheet "Leakage livestock numbers.xlsx." Item will be addressed, pending item 25, above. RLS 8 May 2017
NCR/CL/OFI	CL: Please provide the reports that you indicated would be available.

Response from Project Proponent	This is now available as the eExcel file "Leakage livestock numbers(response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").
Findings	The file Leakage livestock numbers.xlsx was provided. It includes lists of numbers of livestock on the project area and off the project area, for the different conservancies. The tallies appear to be general estimations rather than actual counts. No SOP for compiling, summarizing and reporting was provided in the PD.
NCR/CL/OFI	CL: Please provide an SOP for the gathering and compilation of leakage data, with the assumption the records will be examined during future verifications. Please provide examples of archived reports.
Response from Project Proponent	Details and SOP for monitoring livestock and project borders are provided in the section on Applicability conditions NEW section 3.1.2. Grazing reports are available for inspection athttps://www.dropbox.com/home/Carbon%20project%20documents/livestock%20movement%20maps. SOP for Grazing Reports is contained in the supplied document "Standard Operating Procedures for Monitoring Livestock.pdf Border monitoring is performed by Conservancy game scouts, who are trained to locate and report encroaching livestock, as detailed in their operations manual https://static1.squarespace.com/static/5af1629f12b13f5ce97ca0b5/t/5b6330d9575d1f66316bf5f0/1533227321252/Wildlife-CoMMS+guide_complete_low_res.pdf.
Findings	Archived reports were provided (see above). A detailed SOP on the Wildlife CoMMS system was provided, which largely deals with monitoring wildlife and human-wildlife conflicts, as well as project borders. Sections 3.1.2 of the PDD and MR do not exist.
Item Number	60
VM0032 Version 1 - 16 July 2015 (Section)	8.3.1.1 Leakage emissions from displaced livestock.
VM0032 Version 1 - 16 July 2015 (Description)	Mechanisms must be in place to prevent incursion of livestock onto project lands and to monitor and prevent migration or transport of livestock out of project lands. Such mechanisms may include fencing of private lands, governance structures that penalize lack of cooperation and participation, education, and monitoring on communal grazing lands.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 5.2 of the PDD and MR.
Findings	The project documentation states that monitoring will be used to enforce project boundaries, but the mechanism of patrolling and reporting is not described. Please describe how project boundary monitoring will be conducted and reported.
NCR/CL/OFI	NCR

Response from Project Proponent	The parameters of equation 27 to determine displacement leakage were obtained from monthly reports by grazing coordinators. These reports mapped and reported numbers and locations of livestock on each Conservancy for each month of the year (sometimes reports covered multiple months when livestock were off their home Conservancy). Note that livestock reports were used to differentiate whether livestock were off the Conservancy but on the project area, as opposed to off the Conservancy and off the project area. These data differentiated between the species of livestock but not the age, as that was a level of detail not critical for determining leakage. The estimate of leakage by the penalty method is highly conservative and counts the impact of a juvenile the same as an adult and thus overestimates impact. **(response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").**
Findings	The description of how project boundary monitoring and reporting will be carried out is incomplete, and none of it is included in the PD. No information was provided here on how counts are made, summarized and reported, or how records are kept. 8 February 2018
NCR/CL/OFI	NCR: See findings. Please describe how counts are made, summarized and reported, incorporate this into an SOP (see above). This should appear in the PD.
Response from Project Proponent	Details and SOP for monitoring livestock and project borders are provided in the section on Applicability conditionsin section 4.2. In addition SOP for game scouts, the principal encroachment monitoring personnel is available online at https://static1.squarespace.com/static/5af1629f12b13f5ce97ca0b5/t/5b6330d9575d1f66316bf5f0/1533227321252/Wildlife-CoMMS+guide_complete_low_res.pdf
Findings	Sections 4.2 of the PDD and monitoring report states that the people are aware of conservancy and project boundaries, and notice when there are incursions and livestock thefts. Grazing plans are designed to keep livestock in the project area. Herders and scouts are aware of the borders. Numbers and locations of animals are reported. Sanctions are levied when herders who do not cooperate with grazing plans. It further states there is no incentive to leaving the project area. The SOP for monitoring borders appears in the Wildlife CoMMS Guide. No information on how counts are made was provided, however a review of this item indicates a formal SOP is not needed, only the mechanisms involved to prevent incursions of livestock. This has been provided. Item closed.
Item Number	61
VM0032 Version 1 - 16 July 2015 (Section)	8.3.1.1 Leakage emissions from displaced livestock.
VM0032 Version 1 - 16 July 2015 (Description)	Leakage can be accounted in two possible ways: monitored approach or penalty approach.

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 5.5.1 of the PDD and MR.
Findings	Auditors assumed that the monitored approach was applied to the project but this is not explicitly stated in project documents.
NCR/CL/OFI	CL: Please address the findings and state which leakage method was applied in project documents.
Response from Project Proponent	Specific statement of using penalty method is now stated in section 5.5.1 of the PD **(response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").**
Findings	Version 2.1 of the PD states the penalty method is used. Item closed
Item Number	62
VM0032 Version 1 - 16 July 2015 (Section)	8.3.1.1 Leakage emissions from displaced livestock.
VM0032 Version 1 - 16 July 2015 (Description)	The penalty approach is a more conservative option (leakage calculations will likely be larger) but no monitoring of soils and/or vegetation outside the project area is required and off-project area use of grasslands, croplands, and forests is not differentiated. In this case, displacement leakage (LDt) must be calculated as a proportion of net removals from increased soil carbon in year t (PRSt), based on the proportion of total project livestock-days in project year t, 365 x PNc,t, that occurred outside the project area. *(See equation 17 on page 37 of the methodology for calculation of: Leakage emissions from displaced livestock (tCO2e))*
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 5.5.1 of the PD and MR; Leakage livestock numbers.xlsx

Findings	Validation: The project proponents determined that leakage was negligible but do not specify whether this applied to ex-ante, ex-post etc., and provide no data to support. No data regarding the number or types of animals that may have been involved in leakage was reported or submitted for verification following Equation 17. Auditors understand the methodology intent here at validation is to report the ex-ante leakage estimates from the penalty approach in the PD following VM0032 Section 8.4.1 (4). As noted in another finding, it is not clear whether the project has applied the monitoring or penalty approach and at Round 1 auditors assume that the penalty approach is being applied. Section 5.2 of the PD alludes in numerous places to monitoring of leakage and in one part states,"In the event that major livestock excursions do occur onto grasslands outside the project area, such excursions will be monitored for number of livestock and duration by grazing coordinators and project grazing assistants, and the appropriate deduction taken from soil carbon removals, as prescribed in the VCS SGMAFG methodology." Applying the monitored approach requires deployment of the "Leakage from Displacement of Grazing Activities" module as the penalty approach doesn't have monitoring. The PD stated, "Leakage was judged to be negligible, following VCS Standard 3.3 guidelines." The project actually is required to adhere to the VCS Standard v3.5 (the most current) and leakage has nothing to do with the VCS Standard.
NCR/CL/OFI	NCR: Please address the findings and apply the penalty approach following 8.3.1.1 of the methodology and Equation 17. Please provide all data supporting the results that leakage was negligible ex-ante. Including any field reports or data describing any leakage that might have occurred. Please revise the leakage discussions in all project documentation (PD and monitoring) as noted in the finding to reflect the chosen leakage approach following VM0032. Please remove the incorrect reference to the wrong version of the VCS Standard.
Response from Project Proponent	This is now done in the leakage calculations for the project for 2014 and 2015. See file "Leakage livestock numbers.xls'
Findings	No field reports were supplied, but the file "Leakage livestock numbers.xls" provides data for displacement leakage. Table described in VM0032, sec 8.4.1 (4) not found.
NCR/CL/OFI	NCR: Please read original NCR and subsequent findings. Provide field reports, as requested and add table to PD, as indicated in sec 8.4.1 (4).

Response from Project Proponent	The numbers for 2014-2016 are summarized in the Excel file "Leakage livestock numbers." raw data and maps are provided as the monthly grazing reports, stored in Dropbox folders and available upon request as ftp file transfers. The use of penalty leakage to describe the leakage approach taken has been implemented throughout the PD and Monitoring Report. The incorrect reference has been removed. (response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").
Findings	This finding remains unresolved. Please read original NCR and subsequent findings. Provide field reports, as requested and add table to PD, as indicated in sec 8.4.1 (4).
NCR/CL/OFI	NCR: Please read original NCR and subsequent findings. Provide field reports, as requested and add table to PD, as indicated in sec 8.4.1 (4).
Response from Project Proponent	
Findings	No response was received for this request. The audit team reviewed "Leakage livestock numbers.xlsx" and noted the following: a) The leakage calculations for the 4 monitoring years use incorrect leakage values b) The equation 28 in the PD and equation 29 in the MR do not appear to have been pulled from VM0032 and require explanation c) The PD and MR state leakage is negligible but it appears leakage is included in accounting in the "Net Emissions and Removals" tab of the file "NRT Soil Carbon Data and Removal Calculations v4.xlsx." Please explain d) "Leakage livestock numbers.xlsx" was submitted to the audit team on 25 April 2017 in addition to the version received 06 March 2019. It is not clear why the livestock counts and other values differ between versions. Please explain e) Year 2013 appears to be missing data and 2014 data was applied to it, clarification is requested on why this is appropriate f) The days of the month applied for equation 17 are incorrect
Item Number	63
VM0032 Version 1 - 16 July 2015 (Section)	8.3.1.1 Leakage emissions from displaced livestock.
VM0032 Version 1 - 16 July 2015 (Description)	The penalty approach is a more conservative option (leakage calculations will likely be larger) but no monitoring of soils and/or vegetation outside the project area is required and off-project area use of grasslands, croplands, and forests is not differentiated. In this case, displacement leakage (LDt) must be calculated as a proportion of net removals from increased soil carbon in year t (PRSt), based on the proportion of total project livestock-days in project year t, 365 x PNc,t, that occurred outside the project area.

	(See equation 17 on page 37 of the methodology for calculation of: Leakage emissions from displaced livestock (tCO2e))
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 5.5.1 of the PD and MR; Leakage livestock numbers.xlsx
Findings	Verification: The project proponents also determined that leakage was negligible for the monitoring period, but provide no data for any of the parameters following Equation 17. The leakage section appears to be a direct copy paste from the PD and validation reporting. The PIR also contains discussions of leakage monitoring which are not applicable following the penalty approach. The PIR stated, "Leakage was judged to be negligible, following VCS Standard 3.3 guidelines." The project actually is required to adhere to the VCS Standard v3.5 (the most current) and leakage has nothing to do with the VCS Standard. Auditors recognize that applying the monitored approach requires deployment of the "Leakage from Displacement of Grazing Activities" module. Since the penalty approach was applied this module is not needed. Please see validation finding above.
NCR/CL/OFI	NCR: Please address the findings and report the results of leakage correctly for the monitoring period following the penalty approach and referring to the validation finding above. As needed, please provide all data supporting the claim that leakage was negligible during the monitoring period. Please remove the incorrect reference to the wrong version of the VCS Standard.
Response from Project Proponent	This has been done correctly in Ecel file "Leakage livestock numbers.xls'
Findings	Leakage has been calculated (and is not negligible) in "Leakage livestock numbers.xls" and is reported in table 15, section 5.5.3 of the NKCP VCS CCB Monitoring Impl Report - v2.0. Unless there are additional changes at a later date, this item is addressed.
NCR/CL/OFI	NCR: As changes appear to have been made to the leakage livestock numbers file, please provide.

Response from Project Proponent	All relevant leakage calculations are made in separate spreadsheets for 2014, 2015, and 2016 in the Excel file "Leakage Livestock Numbers"and the incorrect reference to the VCS standardhas been removed. (response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").
Findings	This finding remains unresolved. As changes appear to have been made to the leakage livestock numbers file, please provide.
NCR/CL/OFI	NCR: As changes appear to have been made to the leakage livestock numbers file, please provide.
Response from Project Proponent	
Findings	No response was received for this request, however the finding here is closed to defer to the finding directly above.
Item Number	64
VM0032 Version 1 - 16 July 2015 (Section)	8.3.1.2 Market leakage emissions.
VM0032 Version 1 - 16 July 2015 (Description)	Total leakage is negligible where: *(see equation 18 on page 38 of the methodology that describes the conditions under which Total leakage is negligible)*
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD Section 8.3.1.1; MR Section 5.1
Findings	This finding is pending resolution of Section 8.3.1.1 above where leakage requirements have not been followed. Application of Equation 18 will be checked at the next round when the results of leakage are supplied.
NCR/CL/OFI	
Response from Project Proponent	Leakage calculations using the penalty method are calculated using Eqn 17 from the Methodology on page 37 and are reported in excel file "Leakage Livestock Numbers"
Findings	Equation 18 not applicable as leakage emissions exceed 5% of project emissions in all years (including year 1 at 5.08%). Item addressed.
Item Number	65
VM0032 Version 1 - 16 July 2015 (Section)	8.4.1. Ex-Ante Calculations of Net Emissions and Removals
VM0032 Version 1 - 16 July 2015 (Description)	1) Show a table of baseline and proposed project scenario management activities.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD
Findings	This table was not in the project documentation.

NCR/CL/OFI	NCR: Please address the findings and insert this required table.
Response from Project Proponent	Table 13 in section 5.4.4 of the PD provides all the relevant information. The VCS prevents any claim of credits for reduced methane emissions due to market leakage, andwe expect no change in woody plant biomass due to project management activities. Project management activities, as compared to baseline, are expected to modify grazing intensity, increase the cover of perennial grasses and accumulate soil carbon, These comparisons for baseline versus project scenario, along with their uncertainties are detailed in Table 13.
Findings	A table listing the baseline and management activities was not found. Table 13 shows SOC values at project start and baseline scenario and does not list management activities. The next criteria is satisfied by Table 13.
NCR/CL/OFI	CL: Please address the findings and insert the required table.
Response from Project Proponent	
Findings	No response was received for this finding. It is not clear if Table 4 in the PD is intended to satisfy this requirement as it appears to pertain only to proposed project scenario management activities. Unrelated to this criteria, the verification team noted that PD Table 8 reports incorrect/outdated values and needs to be updated.
NCR/CL/OFI	CL: Please direct the verification team to where this table of baseline management activities can be found to satisfy this requirement within the PD. Otherwise, please ensure this criteria is completely fulfilled. Please also ensure Table 8 of the PD reports correct values throughout.
Response from Project Proponent	Table of without-project and project scenario activities is in section 2.2 of the PD and MR. Former Table 8, now Table 10 in the PD reports emissions and removals comparing baseline to project outcomes.
Findings	A comparison table of without project and with project management activities was confirmed presented in the PD Section 2.2. It is sufficient to satisfy the requirement. Table 11 in Section 4.7 of the PD appears to show the comparison between project and baseline emissions, the values are checked elsewhere. The item is addressed.
Item Number	66
VM0032 Version 1 - 16 July 2015 (Section)	8.4.1. Ex-Ante Calculations of Net Emissions and Removals
VM0032 Version 1 - 16 July 2015 (Description)	2) Show a table of expected parameters and emissions and removals, and their uncertainties, associated with those management objectives; use data from the peer-reviewed literature, measure activities in the project area, or calculate with a model the resulting changes in emissions and removals associated with the management.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD

Findings	This table was not in the project documentation.
NCR/CL/OFI	NCR: Please address the findings and insert this required table.
Response from Project Proponent	Table 13 in section 5.4.4 of the PD provides all the relevant information. The VCS prevents any claim of credits for reduced methane emissions due to market leakage, andwe expect no change in woody plant biomass due to project management activities. Project management activities, as compared to baseline, are expected to modify grazing intensity, increase the cover of perennial grasses and accumulate soil carbon, These comparisons for baseline versus project scenario, along with their uncertainties are detailed in Table 15 in the PD and 16 in the MR.
Findings	This criteria is satisfied through Table 13 in the PD. If the values reported change it will be reassessed accordingly. The item is addressed.
Item Number	67
VM0032 Version 1 - 16 July 2015 (Section)	8.4.2.2.3. Uncertainty in project soil removals
VM0032 Version 1 - 16 July 2015 (Description)	Under a modeled approach, UPRSm,t is obtained from the calculated 95 percent confidence interval, as required by the VCS from a Monte Carlo simulation of modeled changes in soil carbon (see Sections 8.4.2 and 8.1.3.3) averaged across n model runs in stratum m. *(see equation 44 and on page 47 of the methodology for calculation of: UPRSm,t , or uncertainty in project removals through increased soil carbon in stratum m at time t (%))*
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 5.4.4 of the PDD and MR.
Findings	Verifiers were unable to locate the complete transparent quantification steps for SOC uncertainty. Stratum m values are referenced from "(Columns I,J, L,M, & O and P) in NKCP Monte Carlo simulation.xls" in the main calc worksheet v2 but could not be traced.
NCR/CL/OFI	CL: Please identify the source of stratum SOC uncertainty values, please also ensure transparent calculation steps.
Response from Project Proponent	
Findings	
NCR/CL/OFI	
Response from Project Proponent	The source of stratum uncertainty is the table in worksheet "SOC and Model Uncertainty" in NRT Soil Carbon and Removal Calculations v4.xls, which reports standard errors for all model input variables in the baseline and project scenarios for all project strata. These mean and SE are then used in the Monte Carlo analysis to determine uncertainty in project removals in worksheet
Findings	This finding were re-examined after upstream issues are resolved. Pending SNAP inputs.

NCR/CL/OFI	
Response from Project Proponent	
Findings	No further action is needed. This item was confirmed via data check.
Item Number	68
VM0032 Version 1 - 16 July 2015 (Section)	8.4.2.3 Total project uncertainty
VM0032 Version 1 - 16 July 2015 (Description)	**Under a Monte Carlo calculation**, *(see equation 51 and on page 49 of the methodology for calculation of: Utt, or the total project uncertainty (%) is calculated using equation 51 from the methodology)*
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Project Net Removals.xlsx, CCBA Project Description.pdf Section 5.6
Findings	Auditors examined the PD Section 5.6 and were unable to locate the result of Equation 51, Total Project Uncertainty. The worksheet table "Project Net Removals.xlsx" was included in Section 5.6 of the PD and does not compute uncertainty correctly. This calculation is incorrect as Uti is not a per strata parameter (Total project uncertainty (%)). Here leakage is a required component from parameter Let and not the same uncertainty as "Net Change in Carbon Stocks." Further, the uncertainty values in this worksheet could not be traced by auditors.
NCR/CL/OFI	NCR: Please correct the calculation of Total Project Uncertainty following 8.4.2.3 of VM0032. Please also report Total project Uncertainty in the PD.
Response from Project Proponent	The correct formula for uncertainty of removals is now used and leakage uncertainty is applied at the appropriate level. Calculations of uncertainty should now be traceable within the spreadsheet NRT Soil Carbon Data and Removal Calculations.xls. Uncertainty of removals for each strata were determined by iterative use of the Monte Carlo analysis spreadsheet and entered by hand (there is no convenient way to link these). Equating uncertainty in leakage with uncertainty in removals is specified by the Methology VM0032 **(response recevied from Mark 2017-04-21 "090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx").** Leakage uncertainty LEt is assumed to be the same as uncertainty in removals per the Methodology p48 equation 50. **(response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").**

Findings	The PD, dated 12 April 2017, includes equation 51. The reader is referred to table 10 in section 5.4.1 for the calculations. Section 5.4.1 includes one sentence and the general equation for project emissions and removals. Table 10 is actually in section 5.1, Project Scale and Estimated Emissions, Reductions and Removals. Pending further investigation into the use of the SNAP model, but calculations seem to use incorrect BD measurements.
NCR/CL/OFI	NCR: Calculations in the Calculations of Removals spreadsheet uses bulk densities calculated from wet weights. It appears that all calculations will have to be rerun, then rechecked.
Response from Project Proponent	All bulk densities are calculated now with dry weights and table references are cleaned up. Due to using a new, more reliable source of rainfall data, all model and carbon calculations were re-run anyway.
Findings	The bulk densities used in the 'Removals Per Station' tab of file "NRT Soil Carbon Data and Removal Calculations v4.xlsx," are not correct, according to the 'Measurements' tab. The Removals Per Station tab uses bulk densities calculated using moist soil sample weights rather than dry weights. It was unclear to the audit team whether equation 51 or 52 for parameter UTc (total project uncertainty (%)) is used by the project as neither equation appeared to be followed in column L of the tab "Net Emissions and Removals" in the worksheet "NRT Soil Carbon Data and Removal Calculations v4.xlsx."
NCR/CL/OFI	NCR: Please use the correct soil mass (dry) for bulk density calculations. All project calculations using bulk density must also be re-examined and recalculated. Please follow equation 51 or 52 as written in VM0032.
Response from Project Proponent	a)The proper dry mass of soil has been used in the Reequationmovals per Station tab calculation of bulk density, which now match those reported in the Measurements tab. However, this does not affect any downstream removals calculations becaused the observed SOCeq used in calculating removals is directly read from the Measurements Tab (which used the correct dry soil mass in calculating bulk density) . b) We used equation (52) to calculate total project uncertainty, see Table 15
Findings	a) In the workbook, "NRT Soil Carbon Data and Removal Calculations v4.1.xlsx," received on 10 May 2019, the correct bulk density is used, using the dry mass of the soil. Item closed.
Item Number	69
VM0032 Version 1 - 16 July 2015 (Section)	8.4.3 Conservative Approach

VM0032 Version 1 - 16 July 2015 (Description)	3) Because models used in the modeled approach must be validated for the project with data from the project area, no model correction is necessary. However, model predictions must meet the requirements for R2, slope and intercept in a regression versus observed values (see section 8.1.3.3) to assure that the model does not overestimate removals. All parameter choices are to be conservative.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 5.4.3.1 of the PDD, section 4.5.4.3 of the MR.
Findings	Model predictions meet the requirements for R2 and slope, but not the intercept. If subsequent sampling does not improve model performance, another model or the measured approach must be used, according to the methodology, section 8.1.3.3. Please address.
NCR/CL/OFI	NCR: Please see finding.
Response from Project Proponent	This has been fixed with new soil bulk density data. See Fig. 12 (response recevied from Mark 2017-04-21 **"090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx").** Model now meets reuirements. **(response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").**
Findings	Figure 12 in the PD dated 12 April 2017 shows a plot of NDVI for a series of years for 7 conservancies. Section 5.4.3.1 includes the figure (16) to which the project proponent is likely referring. The SNAP model appears to meet the parameters required by the methodology, but calculations appear to have used incorrect data to calculate bulk density. Analysis of the SNAP model with the corrected data will be required before this NCR can be cleared.
NCR/CL/OFI	NCR: See finding under "8.4.2.3 Total project uncertainty". Check calculations and rerun model with correct dry weights for BD.
Response from Project Proponent	All calculations of baseline SOC are now based on soil dry weight in NRT Soil Carbon Data and Removal Calculations v4.xls
Findings	Calculations of bulk density in the "Measurements" tab do not agree with the bulk density calculations used in the "Removals per Station" tab. The incorrect, moist soil masses were used in the "Removals per Station" tab. These bulk densities are significantly higher than the correct bulk densities, in some cases. RLS 2019-04-11.
NCR/CL/OFI	NCR: See the NCR above. Recalculate all project calculations involving bulk density, using dry soil mass.
Response from Project Proponent	The proper dry mass of soil has been used in the Removals per Station tab calculation of bulk density, which now match those reported in the Measurements tab. However, this does not affect any downstream removals calculations becaused the observed SOCeq used in calculating removals is directly read from the Measurements Tab (which used the correct dry soil mass in calculating bulk density)
Findings	Correct bulk densities are now used in "NRT Soil Carbon Data and Removal Calculations v4.1.xlsx." Item closed.

Item Number	70
VM0032 Version 1 - 16 July 2015 (Section)	9.1 Data and Parameters Available at Validation
VM0032 Version 1 - 16 July 2015 (Description)	GWPCH4, , or GWPCH4 must be obtained from the IPCC Second Assessment Report
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 5.4.2
Findings	It is assumed the proper GWP was used in calculations, but there is no evidence of that in spreadsheets.
NCR/CL/OFI	CL: Please see comments in the finding.
Response from Project Proponent	The proper GWP is embedded in the regression equations equation 1, section 4.5.3 and the IPCC Assessment is referenced **(response recevied from Mark 2017-04-21 "090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx").** The proper value for GWP was embedded in the formula for determining CO2e from daily methane emissions in Column L of the worksheet "NRT methane Baseline in the Excel file "NKCP methane Baseline" **(response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").**
Findings	The IPCC GWP for methane (21) is indeed included in equation 1, though it is called "the heating equivalent of methane." It is also mentioned as "GWPCH4" in equation 14. There is no reference for the IPCC assessment report in either case.
NCR/CL/OFI	CL - Please use GWPCH4 to be consistnent.
Response from Project Proponent	The IPCC 5th assessment lists GWPCH4 = 28. This correction has been made in the PD, MR and spreadsheets. The 2015 5th assessment is cited in the statement of GWPCH4 in the PD and MR as Collins et al 2013 chapter 12 in the 5th IPCC report
Findings	The audit team confirmed that the correct GWP value for methane has been used in calculations and reporting. The item is addressed
Item Number	71
VM0032 Version 1 - 16 July 2015 (Section)	9.1 Data and Parameters Available at Validation
VM0032 Version 1 - 16 July 2015 (Description)	Wc,t , or Average body weight for animals of category c in year t

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 5.3, table 8, 5.4.3, 8.3.1 of the PDD.
Findings	Average weights are found in table 8 of the monitoring report, but the origin of those weights was not provided. Please show how the weights were derived.
NCR/CL/OFI	CL: Please see comments in the finding.
Response from Project Proponent	Literature source of weights is now a footnotes to Table 8 **(response recevied from Mark 2017-04-21 "090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx").** Source is now cited at the bottom of Table 8 **(response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").**
Findings	Footnotes were added to the table for origin of the animal weights. This is now table 11 in the PD dated 12 April 2017. Text in section 5.3 refers to table 11 as table 8.
NCR/CL/OFI	CL - See findings. Please update the reference to the table in section 5.3.
Response from Project Proponent	Table references in the PD and MR have been fixed.
Findings	The finding here is closed, as this criteria has been satisfied. Please see the "Reference Errors in PD" finding. The item is addressed.
Item Number	72
VM0032 Version 1 - 16 July 2015 (Section)	9.1.4 Parameters for Calculation of Baseline SOC
VM0032 Version 1 - 16 July 2015 (Description)	SOC%j,m,0, or Proportion soil organic carbon at station j in stratum m at time t = 0 (ie, at the start of the project or since the last verification)
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 4.5.4.3 of the PDD and 4.5.4.2 of the MR.
Findings	While it is known that the project proponent had samples analyzed for % SOC, the data was not provided to the auditors.
NCR/CL/OFI	CL
Response from Project Proponent	Data are now shown in worksheet "Measurements" of 'NRT Soil Carbon Data and Calculations.xls
Findings	Updated monitoring report not yet provided, but results of lab analysis were provided in the soil carbon data and removals spreadsheet. Item addressed.
Item Number	73

VM0032 Version 1 - 16 July 2015 (Section)	9.1.4 Parameters for Calculation of Baseline SOC
VM0032 Version 1 - 16 July 2015 (Description)	BULKm,j,0, or Bulk density at station j in stratum m at time t = 0 (i.e., at the start of the project or since the last verification)
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 4.5.4.3 of the PDD and MR., Bulk density spreadsheet, site visit observations.
Findings	The project documentation reports that a soil core 5cm in diameter, 20 cm long was used to collect bulk density samples. The core was actually an auger, greater than 5 cm in diameter, and being an auger, was not a simple cylinder. Only one core was taken per sampling station, not a minimum of three, as specified in the methodology. Samples were not taken according to a standard method known to the auditors. Significant soil material losses during sampling were observed. Coarse fragments, rocks and pebbles were removed from the sample without accounting for their volume. Some bulk densities reported in the spreadsheet are suspiciously low or high for mineral soils. It is apparent that resampling will be necessary.
NCR/CL/OFI	NCR
Response from Project Proponent	Bulk density was re-measured at all prior sampling stations and at 47 new sampling stations in September 2016. New data are presented in worksheet 'Measurements' of file "NRT Soil Carbon Data and Calculations.xls' A tool was invented to slide a surface underneath a soil core to prevent soil loss.
Findings	New samples were taken and results reported. New method appears to be reasonable. Some results of BD sampling were unusually high. Pending resampling during upcoming field visit.
NCR/CL/OFI	
Response from Project Proponent	
Findings	Bulk density measurements from the site visit of March 2018 were consistent with bulk density measurements made by the project. Item closed.
Item Number	74
VM0032 Version 1 - 16 July 2015 (Section)	9.2 Data and Parameters Monitored
VM0032 Version 1 - 16 July 2015 (Description)	PAm,t
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NKCP VCS CCB Project Description v1.0 draft 4.docx, NRTConservancyStrataRevisedSept2015.kml

Findings	Auditors examined stratification of sandy loam/black cotton soil types as well as lava plateau and rocky hillslopes/mountains in the supplied Google Earth format file "NRTConservancyStrataRevisedSept2015.kml." Though these 4 strata are identified in the PD Section 4.5.1, only the 2 soil types are used in stock quantification following VM0032. Stratification boundaries were also checked as part of the verification site visit in late Sept. 2015. Auditors noted considerable overlap among strata on the ground where boundaries do not match soil types on the ground. Auditors used a freely available soil map for country of Kenya and found disagreement compared against the project stratification. It appears as though stratification boundaries were delineated at a high level and smaller scale refinement is needed. Coarser stratification boundaries can result in propagation of larger sampling error/uncertainty. No evidence or discussion was found in project documentation for a check on the strata boundaries. Note that a shapefile used for areal quantification of strata boundaries is requested also in this module.
NCR/CL/OFI	NCR: Please address the findings and explain the inconsistencies of strata boundaries compared against site visit observations and an independent soils map. As needed, please revise strata boundaries and explaining all methods for their derivation.
Response from Project Proponent	Soil strata boundaries were re-drawn using Google Earth SPOT images at 2-4 km observation distance. This greatly improved the resolution of the boundaries. In addition, a new soil stratum, clay loam, was added based on the Kenya soil map and on ground sampling in far eastern Biliqo Bulesa and Melako. There were areas where soil classes differed across 25-200 meters - the project proponents feel that it is unreasonable to resolve strata at this scale because of the size of the project. Total areas of even clay loam encompassed more than 100,000 ha, and these finely articulated soil classes in a few locations would change estimates of coverage by 100-500 ha at most, less than 1% of the total. The time required to map soil classes at 20 m resolution is beyond the point of diminishing returns.
Findings	As stratification methods were undefined in project documentation (PD and MR) at the spatial level verifiers reviewed stratum boundaries as described in the Round 1 response. Resolution and minimum mapping unit for the stratification effort are at the discretion of the proponents. Imagery review suggested that soil stratification was consistent and in-line with conditions on the ground and as described in Section 4.5.1 of the PD. However, there are topological issues (ArcMap topology tool) with geospatial stratum boundaries, i.e. they overlap one another, there are gaps between boundaries, and related. VCS princples in the Standard v3.7 call for accuracy and conservativeness, where boundaries overlap for instance it is not conservative. Verifiers note there are also topological errors in Conservancy geospatial boundaries.

NCR/CL/OFI	CL: Please further define stratification methods for soil typing in project documentation as followed for baseline soil stratum. Please also fix geospatial topology issues as noted in the finding.
Response from Project Proponent	The errors in area computation have been fixed in the supplied .kml vector layer of project strata. The polygons were snapped so they did not overlap, topologically corrected and area calculated in ArcGIS rather than Google Earth. Stratification methods from interpreting satellite imagery are now detailed in the PD and MR as an additional paragraph under Stratification
Findings	Stratification is described in Section 4.5.1 of the PD (version submitted 06 March 2019) This finding is closed, please see the next finding where the topology issues are discussed.
Item Number	75
VM0032 Version 1 - 16 July 2015 (Section)	9.2 Data and Parameters Monitored
VM0032 Version 1 - 16 July 2015 (Description)	(PAm,t) Description of measurement methods and procedures to be applied: Using shape files in a GIS or from known coordinates of stratum boundaries or from legal descriptions of the property included in the project area.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NKCP VCS CCB Project Description v1.0 draft 4.docx Section 8.2
Findings	This required validation parameter was included in Section 8.2 of the PD. However, this table is improperly formatted following the VCS template. The choice of data states, "Using shape files in a GIS." Auditors have not been provided shapefiles to verify stratum areas only Google Earth format files. Note that in formulating GPS files for ESI team members on-site from the supplied .kml files, it was assumed that projected coordinate system of UTM84_37S was used for the project. The workbook "NRT summary soil data.xlsx" reports various total hectares depending on the year. Auditors were unable to verify the hectares used (participating) for carbon accounting. During review of the file "NRT summary soil data.xlsx" auditors noted broken link references to the 28 strata hectares from the file "Tables for VCS docs.xlsx." Broken links should not be included in calculation worksheets supplied for the audit and the source of hectares is needed. A finding related to broken links is included in the General section of the review.

NCR/CL/OFI	CL: Please provide a shapefile which portrays stratum areas used in annual carbon accounting. Please also confirm this is the source of strata level hectare values used in "NRT summary soil data.xlsx" and other project calculations. Finally, please also fix table formatting to be in line with the VCS template.
Response from Project Proponent	This is now fixed. Shapefiles of the Conservancy boundaries are provided. Conservancy area (including rock or rocky soils and lava) and project area (black, sandy loam, and clay loam soils in the Conservancy areas) are now distinguished. All Conservancy, management and soil classes are accounted for with polygons that add up to total Conservancy area are now provided as a .kml and shapefile layer.
Findings	Stratum areas used in quantification "NRT Soil Carbon Data and Removal Calculations v2.xlsx" tab - "Project Areas by Stratum" were traced to "NRTConservancyStrataFinal2017.kml" and Google Earth computed areas. The verifier notes that using measured areas from Google Earth without a projection that minimizes distortion can result in exaggerated area estimates that are not conservative following QA/QC procedures for this parameter and VCS principles. The verifier found all strata areas to be higher using Google Earth measurements compared to those area measurements computed in ArcMap (calculate geometry). Further, the verifier noted that 1 stratum hectare was transcribed incorrectly and 1 stratum was missing
NCR/CL/OFI	CL: Please address the findings and compute area measurements following best practice, methodological requirements and VCS principles for conservativeness. Please correct and update calculations.
Response from Project Proponent	The errors in area computation have been fixed in the supplied .kml vector layer of project strata. The polygons were snapped so they did not overlap, topologically corrected and area calculated in ArcGIS rather than Google Earth. See https://www.dropbox.com/home/NRT%20polygons
Findings	The verification team confirmed that areal computations in hectares are now correct for project zone and strata (NRTConservancyStrataFinal2017-ProjectZone.shp and NRTConservancyStrataFinal2017-Soka.shp). However, the strata shapefile contains self intersecting polygons and overlaps which result in incorrect topology.
NCR/CL/OFI	CL: Please ensure correct topology, self-intersections and related are fixed in the stratum shapefile used for determination of area.
Response from Project Proponent	Polygons were corrected through use of et-geowizard tool for Arc. Boundaries are now snapped rather than hand-fit in new shape file and .kml files in NKCP New GIS Round 3 folder within NKCP New files round 3 Topological corrections are re-done and areas recalculated.

Findings	The audit team reviewed the newest strata shapefile "NRTConservancyStrataFinal2017-Soka-May6.shp" and noted the following: -A small amount of overlapping and/or self-intersecting polygons (slivers) were found in some situations representing 0.0015% of the total stratum hectares. Examination of a subset of these slivers indicated conservative assumptions were made to exclude overlaps and thus be excluded from eligibility for carbon accounting. These discrepancies do not constitute a material (1%) effect on emission reductions. No further action is needed for this component. -Hectares for some stratum could not be confirmed as correctly calculated geometry, approximately 81 hectares total for all stratum were found to differ from the proponent
Item Number	76
VM0032 Version 1 - 16 July 2015 (Section)	9.2 Data and Parameters Monitored
VM0032 Version 1 - 16 July 2015 (Description)	(PAm,t) QA/QC procedures to be applied: Areas must be determined from accurate GIS layers of classified project area or from legal descriptions of property included in the project area. Verification should be with Global Positioning Systems (GPS) with an accuracy of 10 m or less. Ground points may include permanent sampling stations but also may be necessary to include points at defined stratum boundaries or along roads.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NRTConservancyStrataRevisedSept2015.kml
Findings	Auditors noted that the supplied Google Earth file "NRTConservancyStrataRevisedSept2015.kml" contains boundaries that are not well correlated to ground features. During the site visit in late September 2015 auditors noted that boundaries overlapped in multiple locations. Further, polygons do not appear to have been deliberately drawn and sometimes overlap.
NCR/CL/OFI	NCR: Please address the findings and adjust strata boundaries so as not to overlap and are consistent with ground features.
Response from Project Proponent	This has been fixed with revised soil class polygons resolved at $\pm$ 50-100 m (2 -4 km observation height)
Findings	Verifiers reviewed the shapefile provided "NKCP Strata Polygons Final 2017.shp." Permanent sampling stations and defined stratum boundaries were visited during the site visit in June 2017. The finding here is closed to defer to earlier finding under criteria "PAm,t" where topological errors were noted. The item is addressed.
Item Number	77

VM0032 Version 1 - 16 July 2015 (Section)	9.2 Data and Parameters Monitored
VM0032 Version 1 - 16 July 2015 (Description)	Comments: Projects must ensure that the following information in regards to the project area of each stratum is provided within the relevant area of the project description: 1) Map(s) of the locations of the permanent sampling plots overlaid on a map of project strata. 2) Results of cluster analysis to determine project strata. 3) Table of all project strata, their description, and area, PAm 4) Results of analysis to determine the number of sampling units and their allocation among strata
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD Section 8.2
Findings	A map of the project strata is presented in the PD and a finding is issued elsewhere in this review for re-formatting. However, items 2-4 of this required parameter Pam,t are missing from the PD.
NCR/CL/OFI	NCR: Please address the findings and report the items 2-4 listed per this parameter requirement.
Response from Project Proponent	These data are available in worksheet 'Soil polygons and area' in NRT Soil Carbon Data and Calculations.xls'
Findings	Section 4.5.1 of the PD contains a description of the cluster analysis and the results for determination of project stratum. However, a table of project stratum hectares could not be located in the PD. Please see related findings where stratum hectares reported may change due to topology and projection discrepancies.
NCR/CL/OFI	CL: Please address the findings and report stratum hectares in a table within the PD following this requirement.
Response from Project Proponent	Areas of soil and Conservancy strata are now correctly calculated using Arc following snapping of polygon borders and topological correction. Raw data are available as the attribute file in the supplied shape file https://www.dropbox.com/home/NRT%20polygons, and stratum areas are calculated from the attribute file data in tab "Polygon Areas & Strata" in NRT Soil Cabon Data and Calculations v4.xls
Findings	The PD Section 4.5.1 (version submitted 06 March 2019) was reviewed in response to this finding. 1) Figure 11 satisfies this criteria 2) Generalized Maximum Likelihood model was displayed in Table 5 3) Table 11 satisfies this criteria 4) The "online calculator Free Statistics Calculators Version 4.0" was used to determine number of sampling units. Results of sampling unit allocation was explained. The item is addressed.
Item Number	78

VM0032 Version 1 - 16 July 2015 (Section)	9.2.6 Parameters for Leakage
VM0032 Version 1 - 16 July 2015 (Description)	DNC,x, or Number of livestock of each category c that were outside the project area (outside the fence defining the boundary of the project area, or, in the case of open grazing lands eg pastoralist areas, beyond 2 km from the mapped project area boundary on day x
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 5.5.1 of the MR.
Findings	The formula for calculating leakage is described, and leakage is reported in table 13, but the data used to derive leakage was not provided. Please address.
NCR/CL/OFI	
Response from Project Proponent	Counts of livsetock used to determine leakage are now available in file 'Leakage livestock numbers.xls'
Findings	Leakag livestock numbers.xls was found to have been submitted. Please see elsewhere in the review where parameter DNC is captured in a derivative calculation. The item here is addressed.
Item Number	79
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Section)	2.3.1 Sub-step 3a
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Description)	ii) Debt funding is not available for this type of project activity;
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	The nature of the livestock markets in the area.
Findings	No mention of this was found in the project documentation. Since livestock are mostly kept for family use or local sale, there may not be any debt funding available. However, this was not addressed.
NCR/CL/OFI	NCR - Please explain whether debt financing is available for this sort of project.
Response from Project Proponent	These and the other questions were addressed in section 4.6 regarding Additionality using information from a recent consultant report to explore the development of livestock value chains (SPARD Africa, Ltd report to NRT Trading, 2016). In this case, the SPARD report clearly indicates the lack of debt financing and livestock loss insurance for pastoralists
Findings	Section 4.6 of the NKCP VCS CCB Project Description v2.0, dated 12 April 2017 states that, according to a document titled SPARD Africa, Ltd report to NRT Trading, 2016, debt funding is generally not available because livestock on the hoof in rangelands hold little cash value. The SPARD Africa report was not provided. It is referenced several times in section 4.6, but it does not appear in the references section.

NCR/CL/OFI	CL: The statement that debt financing is unavailable is reasonable, but the VVB will need to see a copy of the SPARD report to confirm. Add this report to the references section of the PD and Monitoring report.
Response from Project Proponent	The SPARD report has been provided to the verifiers (see supporting documents in and is now cited in section 4.2 and in 5.5.2 of the PD
Findings	The SPARD report was provided to the auditors. One of the main issues addressed in the report is the low quality of the animals, and that the animals are largely used for local consumption, with almost no exports. Item closed.
Item Number	80
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Section)	2.3.1 Sub-step 3a
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Description)	iii) No access to international capital markets due to real or perceived risks associated with domestic or foreign direct investment in the country where the project activity is to be implemented, as demonstrated by the credit rating of the country or other country investment reports of reputed origin;
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	SPARD report
Findings	No mention of this was found in the project documentation. Since livestock are mostly kept for family use or local sale, there may not be any debt funding available. However, this was not addressed.
NCR/CL/OFI	NCR - Please address whether there are barriers to international capital markets.
Response from Project Proponent	The SPARD report indicates that In this case, disease quarantines and poor carcass quality deny access to international markets.
Findings	No discussion on the availability of international capital was found in project documentation. SPARD report, which is used to answer this item, was not provided.
NCR/CL/OFI	NCR: Please include a discussion of access to international capital markets in the PD and provide the SPARD report that is being used to justify this response.
Response from Project Proponent	International markets are now discussed in section 5.5.2 of the PD p. 57
Findings	Section 5.5.2 of the PD and the SPARD report discuss the fact that only about 1% of all Kenyan meat is exported, and that the country is a net importer of red meat. At this time, the communities of the NRT do not have access to international markets. Item closed
Item Number	81
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Section)	2.3.1 Sub-step 3a

VT0001 (T-ADD),Version 3.0 (1 February 2012) (Description)	iv) Lack of access to credit.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	SPARD report
Findings	It is likely that most or all of the people in the project area lack access to credit. However, this was not addressed.
NCR/CL/OFI	NCR - Please explain any lack of access to credit to implement this project.
Response from Project Proponent	See item 2 response above
Findings	See findings in item 2. Pending the closing of the item in line 2
NCR/CL/OFI	NCR: See findings.
Response from Project Proponent	The SPARD report has been provided to the auditors
Findings	Access to credit has now been addressed. The SPARD report was provided, and discussion is included in section 5.5.2 of the PDD, v2.1.3. Item closed.
Item Number	82
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Section)	2.4 Step 4
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Description)	2.4.2 Provide an analysis to which extent similar activities to the one proposed as the VCS AFOLU project activity have been implemented previously or are currently underway.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 4.6 of the PDD and MR.
Findings	The project proponent states, "Planned rotational grazing is practiced in the region, but only on private lands such as the Ol Pejeta Conservancy in Laikipia Province. On communal lands, virtually all pastoralists currently lack the physical security and financial resources to coordinate such planned grazing as in scenario 2 [planned, rotational grazing]." However, no analysis of the extent of these other planned rotational grazing projects was provided.
NCR/CL/OFI	NCR - Please provide an analysis of the extent that planned rotational grazing is being used in the region.

Response from Project Proponent	This is now addressed in d) Step 4 Common Practice Analysis. The SPARD report indicates that rotational grazing is practiced in fenced, private ranches in Laikipia County, covering 20% of the area, but is not practiced in Isiolo, Samburu, or Marsabit Counties which account for the majority of the project area. **(response recevied from Mark 2017-04-21 "090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx").** This is now addressed in d) Step 4 Common Practice Analysis. The SPARD report indicates that rotational grazing is practiced in fenced, private ranches in Laikipia County, covering 10% of the area, but is not practiced in Isiolo, Samburu, or Marsabit Counties which account for the 90% of the project area. **(response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").**
Findings	Section 4.6 of the NKCP VCS CCB Project Description v2.0, dated 12 April 2017 now describes the degree that planned rotational grazing is being used in the region. Most of the response uses the SPARD report as its basis. SPARD report was not provided.
NCR/CL/OFI	CL: Please provide the SPARD report, and guidance as to where in the report the appropriate information can be found.
Response from Project Proponent	The SPARD report has been provided to the verifiers. The relevant text can be found on pp. 57-59 of the SPARD report (in supporting documents)
Findings	The SPARD report was provided to the auditors. Pages 57-59 discuss livestock markets in Kenya and the region beyond Kenya, not rotational grazing. In section 3.2, rotational grazing was not mentioned as a mitigation strategy pastoralists were using for drought mitigation. Section 6 describes seasonal livestock movement in the NRT, which essentially means grazing near settlements during the wet season, and moving the herds when forage is exhausted. it appears that planned rotational grazing, as described in the project description, is not widely used. Item closed.
Item Number	83
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Section)	2.4 Step 4
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Description)	Provide documented evidence and, where relevant, quantitative information.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 4.6 of the PDD and MR.
Findings	No documented evidence was provided, only the statement that planned rotational grazing is being used on private lands in the region.

NCR/CL/OFI	NCR - Please provide evidence of the projects using planned rotational grazing in the region.
Response from Project Proponent	This is now addressed in d) Step 4 Common Practice Analysis. The SPARD report indicates that rotational grazing is practiced in fenced, private ranches in Laikipia County, covering 2% of the area occupied by livestock in the four county area: Laikipia, Isiolo, Samburu, or Marsabit Counties
Findings	See findings for item 5, above.
NCR/CL/OFI	CL: Please provide the SPARD report, and guidance as to where in the report the appropriate information can be found.
Response from Project Proponent	The SPARD report has been provided to the verifiers. The relevant text can be found on pp. 37-45 of the report.
Findings	The SPARD report was provided to verifiers. The amount of land in private ranches is unclear. Table 2 of SPARD does not show land tenure for a category called "private ranches."
NCR/CL/OFI	Please show the verifiers where the data for the amount of land used for rotational grazing, outside of the project, can be found.
Response from Project Proponent	In the Common Practice section of 4.6 Additionality, we have added the areas of the three ranches that were implementing rotational grazing during the baseline period and compared that to the grazing land in the 4 county area. Details and calculations, including exclusion of non-grazing land are in"NKCP additionality common practice land use.xls" supplied in New files round 3 folder in Dropbox
Findings	Section 4.6, d (step 4) names and includes the areas of the three private ranches that use rotational grazing. It amounts to about 0.5% of the area suitable for grazing in those conservancies. Item closed.
Item Number	84
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Section)	2.4 Step 4
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Description)	2.4.3 If activities similar to the proposed VCS AFOLU project activity are identified, then compare the proposed project activity to the other similar activities and assess whether there are essential distinctions between them.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Sections 4.6 of the PDD and MR.
Findings	The other similar activities identified occur on private conservancies, according to the PDD and MR. Aside from the private nature of these lands, no other comparison was made.
NCR/CL/OFI	NCR - Please compare the activities occurring on other conservancies to the project activities.
Response from Project Proponent	See responses in d) Step 4 in section 4.6

Findings	The version of the PD, dated 12 April 2017, includes a much expanded discussion. Rotational grazing is done on less than 150,000 ha, less than 2% of the area in Laikipia, Samburu and Marsabit Counties. It is part of a livestock finishing operation for meat markets and requires large cash flows for fencing and security. The Project is the only example of pastoralists implementing rotational grazing. The physical security and resources are not otherwise available to pastoralists. Item closed.
Item Number	85
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Section)	2.4 Step 4
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Description)	If certain benefits rendered the similar activities financially attractive (e.g., subsidies or other financial flows), explain why the proposed VCS AFOLU project activity cannot use the benefits.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	
Findings	This was not addressed in the project documentation.
NCR/CL/OFI	NCR - Please address whether financial benefits were available to these other conservancies that are not available to the project.
Response from Project Proponent	See responses in d) Step 4 in section 4.6
Findings	The discussion in the version of the PD, dated 12 April 2017, states that the livestock to market program was a joint project between NRT, NRT Trading and TNC, required significant donor capital and private ranches with sufficient forage. There is only sufficient forage in this operation for about 5,000 head of livestock. The first site visit confirmed the generally poor condition of grazing lands. It appears unlikely that significant areas of high quality forage are available to further expand the livestock to market project. Item will be addressed pending results of interviews during second site visit.
NCR/CL/OFI	
Response from Project Proponent	
Findings	Interviews and observations during the second site visit confirms the lack of suitable forage and a lack of finances to expand the livestock to market program. Item closed.
Item Number	86
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Section)	2.4 Step 4
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Description)	If applicable, explain why the similar activities did not face barriers to which the proposed VCS AFOLU project activity is subject.

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	
Findings	This may not be applicable, but the comparisons and documentation required for this analysis are lacking.
NCR/CL/OFI	NCR - After the comparisons and documentation required above, explain why similar activities did not face the same barriers as the project.
Response from Project Proponent	The private ranches benefit from fencing and security to provide control of the forage resource, and forage is abundant enough to sustain the finishing of livestock for sale on meat markets.
Findings	See findings in items 8 and 9, above. Similar activity to the livestock to market program relies on fencing and higher level of security than is possible on a large project area. The livestock to market program also depends on the existence of adequate forage, which limits its size. Item will be closed, pending results of site visit interviews.
NCR/CL/OFI	
Response from Project Proponent	
Findings	Interviews and observations during the second site visit confirms that the kind of fencing required for these relatively small livestock finishing operations would not be possible for a project of nearly 2 million ha. Fencing for the comparably small rhino reserve in the Sera conservancy was a major operation that requires regular inspection and maintenance that would be beyond the scope of a project of this size. Item closed.
Item Number	87
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Section)	2.4 Step 4
VT0001 (T-ADD),Version 3.0 (1 February 2012) (Description)	If Step 4 is satisfied, i.e. similar activities can be observed and essential distinctions between the proposed VCS AFOLU project activity and similar activities cannot be made, then the proposed VCS AFOLU project activity cannot be considered additional. Otherwise, the proposed VCS AFOLU project activity is not the baseline scenario and, hence, it is additional.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	
Findings	This analysis must be successfully completed before the project can be considered additional
NCR/CL/OFI	When the other NCRs in the common practice analysis are completed, this one will likely be cleared.
Response from Project Proponent	New Common Practice Analysis is presented on p. 55 of the PD STEP 4 in section 4.6

Findings	The proposed VCS AFOLU project activity is not the baseline scenario and is additional as project activities of planned rotational grazing is not common practice with the exception of two private ranches. Please see above in this review where step 4 is further satisfied.
NCR/CL/OFI	
Response from Project Proponent	
Findings	The proposed VCS AFOLU project activity is not the baseline scenario and is additional as project activities of planned rotational grazing is not common practice with the exception of two private ranches. Item closed
Item Number	88
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 1 Project Management
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	Species planted (where applicable) associated with more than 25% of the stocks on which GHG credits have previously been issued are not native or proven to be adapted to the same or similar agro-ecological zone(s) in which the project is located.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Risk Tool, Internal Risk Section; PD, Section 7.1
Findings	While the risk score for this element is not in question because the PD states no non-native species will be used, there is an inconsistency between the PD and Risk Report. The PD states "The project will not introduce any non-native or GMO species into the project area, as re-seeding or plantings are not a project activity." however the Risk report states "The project activities involve only planting of native perennial grass species, such as Cenchrus ciliara or Pennisetum sp. and so this risk is.".
NCR/CL/OFI	NCR: Please address the inconsistency between the PD and Risk Report regarding project activities and planting.
Response from Project Proponent	The PD and the Risk Report will both say"The project will not introduce any non-native or GMO species into the project area. The project activities involve only planting, without tillage, of native perennial grass species, such as Cenchrus ciliara or Pennisetum sp.
Findings	Both the PD and the Risk Report now state that "The project will not introduce any non-native or GMO species into the project area. The project activities involve only planting, without tillage, of native perennial grass species, such as Cenchrus ciliara or Pennisetum sp." This item is addressed.

Item Number	89
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 1 Project Management
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	Management team does not include individuals with significant experience in all skills necessary to successfully undertake all project activities (ie, any area of required experience is not covered by at least one individual with at least 5 years experience in the area).
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Risk Internal Risk Section
Findings	The majority of skills appear to have individuals with significant experience, though financial assessment/analysis is not discussed.
NCR/CL/OFI	NCR: Please address the experience on the team with regard to financial projections/assessment.
Response from Project Proponent	NRT Trading and its CEO Garry Cullen have been added to the major contacts and to the description of expertise among the project proponents.
Findings	Language has been added to the PD, Section 1.4 detailing the financial role and expertise of Garry Cullen. This item is addressed.
Item Number	90
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 1 Project Management
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	Mitigation: Management team includes individuals with significant experience in AFOLU project design and implementation, carbon accounting and reporting (eg, individuals who have successfully managed projects through validation, verification and issuance of GHG credits) under the VCS Program or other approved GHG programs.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Risk Internal Risk Section
Findings	Management team has significant experience but evidence could not be located linking the individuals listed with experience to the two projects referenced.
NCR/CL/OFI	NCR: Please provide evidence of successful validation, verification and issuance of these projects and linkage of the projects to the persons referenced.

Response from Project Proponent	Evidence is provided of TNC partnership in the Yauda Valley REDD project in Tanzania: http://www.planvivo.org/docs/140605_Validation-Report_PV_update.pdf , and of Ritchie's authorship of the VCS VM0032 sustainable grazing management methodology: http://database.v-c-s.org/sites/vcs.benfredaconsulting.com/files/VM0032%20Meth%20for%20the%20Adopt%20of%20Sustain%20Grasslands%20through%20Adj%20of%20Fire%20and%20Grazing%20v1.0.pdf
Findings	The verifiers reviewed the Plan Vivo website, and noted the TNC has assisted in at least one validated/verified program in Plan Vivo. Also, through the experience of the auditors, the auditors know that TNC has been involved in projects in multiple GHG programs. Also, it is apparent that Soils for the Future developed the VM0032 methodology. This item is addressed.
Item Number	91
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 1 Project Management
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	Mitigation: Adaptive management plan in place. Adaptive management plans are those that identify, assess and create a mitigation plan for potential risks to the project, including those identified in this document, and any other obstacles to project implementation. They include a process for monitoring progress and documenting lessons learned or corrections that may be needed, and incorporating them into project decision-making in future monitoring periods. The onus is on the project proponent to demonstrate that such plans are in place, that such plans have considered the realm of potential risks and obstacles to the project, and that a system is in place for adapting to changing circumstances.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Risk Internal Risk Section
Findings	Plan not provided. Details provided in the risk report discuss some aspects of an adaptive plan but do not sufficiently include a process for monitoring progress and documenting lessons learned or corrections that may be needed, and incorporating them into project decision-making in future monitoring periods.
NCR/CL/OFI	NCR: Please provide the full adaptive plan so it can be assessed to confirm it contains monitoring and adaptive elements.
Response from Project Proponent	NRT Carbon Project Adaptive Management Plan.pdf is now available that addresses all these concerns.
Findings	This document has not been received.
NCR/CL/OFI	CL: Please provide NRT Carbon Project Adaptive Management Plan.pdf

Response from Project Proponent	The NKCP Adaptive Management Plan is now in the supporting documents folder that will be sent to ESI and placed in a Dropbox folder of the same name.
Findings	The document "NKGCP adaptive management plan 2017.pdf" was confirmed received. It was reviewed by the verification team and meets the requirements of this mitigation criteria. The item is addressed.
Item Number	92
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 2 Financial Viability
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	Project cash flow breakeven point is less than 4 years from the current risk assessment
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Risk Report, Financial Viability Section
Findings	Project states breakeven calculated at year 2 and references a business plan, but this document has not been provided.
NCR/CL/OFI	NCR: Please provide the business plan documenting all costs, expenditures and revenue/funding sources. This cash flow/NPV analysis should be a spreadsheet or similar format covering the project lifetime (30 years).
Response from Project Proponent	Business plan updated in file 'NRT Business Plan.docx' in the Financials folder
Findings	The file NKCP quick summary financials.xlsx includes net revenues and allocations, expected through 2042. However, these values do not appear to be in NPV. If they are in NPV, it is unclear what discount rate is used. Additionally, the values (gross revenue, profit, etc.) in this spreadsheet for 2017 and 2018 do not appear to correspond with the NRT Carbon Proj anticipated cash flow.xlsx spreadsheet. The breakeven analysis does not appear to show any capitol investment, rather just assuming that all credits (post-buffer removal) will be sold every year, providing operating capitol. Is this really the case or has capitol investment been obtained? Please show all secured capitol investment totals in the breakeven analysis, noting that all secured funding must be supported as described in section 2.2.2 4) of the VCS Risk Tool. Additionally, the business plan milestones are out of date in many/most areas (states val/ver completion in April/June 2017, etc.)

NCR/CL/OFI	Please clarify if NPV was used and if so, what discount rate was used. Please correct the apparent discrepancies between the spreadsheet NRT Carbon Proj anticipated cash flow.xlsx and the file NKCP quick summary financials.xlsx for net revenue, profit and all other appropriate values. Please add a column summarizing the cumulative cash flow and showing the year of breakeven. Note that the project mush demonstrate that it remains at breakeven thrgouhout the project lifetime. Please show all secured capitol investment totals in the breakeven analysis, noting that all secured funding must be supported as described in section 2.2.2 4) of the VCS Risk Tool. Please correct ALL milestones listed in the business plan.
Response from Project Proponent	The cash flow calculations have been re-done, showing cumulative cash flow. The breakeven point and year is stated in the N-P Risk Report. An NPV calculation is made and compared with non project scenario. Capital investment values are supported with offer sheet from large corporate buyer. The business plan has been updated (in supporting documents) and its cash flow meshes with that used in the Risk Report NKCP Cash Flow and NPV v1 Feb 2019.xls and with the NKCP Quick Summary Financials.xls, which now also agree with each other.
Findings	Two worksheets were supplied for this finding; NKCP Cash Flow and NPV Change Calc 2019-02-27.xlsx and NKCP Cash Flow and NPV v1 Feb 2019.xlsx.The audit team noted the difference between these files appears to be the net tonnes by tranche. The following items were noted: -Net tonnes used for the carbon revenue appear incorrect following the values in "NRT Soil Carbon Data and Removal Calculations v4.xlsx" -No operating costs are included in the first 6 years of the project, despite grant availability the audit team understands that project development has already incurred costs which should be spread out annually -Audit team is unsure of the source of costs and requests a breakdown of this cash flow out -The external risk total reported on page 9 is incorrect
NCR/CL/OFI	CL: Please address the findings as noted, and providing explanations in response to this finding.
Response from Project Proponent	There is now only one spreadsheet, which includes operating costs and NPV calculated annually, and revenues are derived from ex ante net removals. The N-P Risk Report has been redone with the proper template.

Findings	The updated, and combined, spreadsheet for financial viability was reviewed in response to the finding. The cash flow breakeven analysis assumes complete credit sales of grantable emission reductions within 4 years of successful validation/verification in year 2019. The audit team believes this is a reasonable assumption but notes the following elements; NRT costs are not included, successful credit sales at estimated value is assumed, and year over year project operating costs were an approximation. However, given the expected credit volume available for issuance at the end of the first verification period, a breakeven within the first 4 years of this current risk assessment is reasonable. The item is addressed.
Item Number	93
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 2 Financial Viability
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	Project has secured 80% or more of funding needed to cover the total cash out before the project reaches breakeven
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Risk Report, Financial Viability Section
Findings	Project states it has secured 80% or more of funding needed to cover the total cash out before the project reaches breakeven. The Risk Report references a business plan, but this document has not been provided.
NCR/CL/OFI	
Response from Project Proponent	Profit and Loss Statement available in excel file 'NRT Carbon Proj Anticipated Cash Flow.xls.
Findings	Project's risk report states "Project costs are estimated at $1 million/yr. Project implementation and research to establish project baseline has been funded and implementation continues to be funded by grants from USAID and the. Implementation and monitoring of project activities will be covered through 2016 by the Danish international aid agency DANIDA and USAID grants to NRT partner. A USAID grant" While grants and other potential funding sources are mentioned in the risk report and business plan, the evidence required by section 2.2.2 4) of the VCS risk tool requiring support for the secured funding could not be located.
NCR/CL/OFI	Please show all secured capitol investment totals in the breakeven analysis, noting that all secured funding must be supported as described in section 2.2.2 4) of the VCS Risk Tool.

Response from Project Proponent	The cash flow calculations have been re-done, showing cumulative cash flow. The breakeven point and year is stated in the N-P Risk Report. An NPV calculation is made and compared with non project scenario. Capital investment values are supported with offer sheet from large corporate buyer. The business plan has been updated (in supporting documents) and its cash flow meshes with that used in the Risk Report NKCP Cash Flow and NPV v1 Feb 2019.xls and with the NKCP Quick Summary Financials.xls, which now also agree with each other.
Findings	The audit team reviewed materials provided in response to the finding. The business plan referenced could not be found in materials provided, the file name is necessary. The audit team was unable to confirm that all secured funding is supported as described in section 2.2.2 4) of the VCS Risk Tool.
NCR/CL/OFI	CL: Please assist the audit team in locating the referenced business plan. Please also provide evidence to support all secured funding as described in section 2.2.2 4) of the VCS Risk Tool.
Response from Project Proponent	We no longer claim secured funding. Business plan is now included in NKCP new docs round 3 folder in Dropbox
Findings	The project has selected the most conservative and appropriate option for this criteria. The item is addressed.
Item Number	94
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 3 Opportunity Cost
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	NPV from project activities is expected to be between 20% and up to 50% more profitable than the most profitable alternative land use activity
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Risk Report, Opportunity Cost Section
Findings	NPV analysis for project not provided. The sources for the numbers provided for most profitable alternative are not provided and it is not clear if an analysis of NPV has been run for alternative scenarios.
NCR/CL/OFI	NCR: Please provide NPV analysis for project scenario covering the crediting period. Please provide NPV analysis for the alternative scenarios and include the sources for assumptions so they can be confirmed.
Response from Project Proponent	NPV analysis performed in Profit and Loss worksheet of 'NRT Carbon Proj Anticipated Cash Flow.xls' in Financials folder

Findings	This section of the project risk report describes the high level current total, however the analysis requires annual NPV. The file NKCP quick summary financials.xlsx includes net revenues and allocations expected through 2042. However, these values do not appear to be NPV. If they are in NPV, it is unclear what discount rate is used. Additionally, the values (gross revenue, profit, etc.) in this spreadsheet for 2017 and 2018 do not appear to correspond with the NRT Carbon Proj anticipated cash flow.xlsx spreadsheet.
NCR/CL/OFI	Please clarify if NPV was used and if so, what discount rate was used. Please correct the apparent discrepancies between the spreadsheet NRT Carbon Proj anticipated cash flow.xlsx and the file NKCP quick summary financials.xlsx for net revenue, profit and all other appropriate values.
Response from Project Proponent	The cash flow calculations have been re-done, showing cumulative cash flow. The breakeven point and year is stated in the N-P Risk Report. An NPV calculation is made and compared with non project scenario. Capital investment values are supported with offer sheet from large corporate buyer. The business plan has been updated (in supporting documents) and its cash flow meshes with that used in the Risk Report NKCP Cash Flow and NPV v1 Feb 2019.xls and with the NKCP Quick Summary Financials.xls, which now also agree with each other.
Findings	The audit team understands that NPV from project activities will be greater than 50% more profitable than a no-project scenario. The score selected is appropriate. Also, unrelated to the current finding but needs correction is the current risk report (NKCP Non-Permanence Risk Report v3.2.docx) template is not the most current available from the VCS website (VCS Non-Permanence Risk Report Template, v3.2-19Oct2016.doc) and the font of the risk report does not follow VCS template rules. This is evident for instance in the incorrect statement "Total may not be less than 0." for Total Opportunity Cost.
NCR/CL/OFI	CL: Please address the findings and use the correct VCS risk report template and following all instructional text.
Response from Project Proponent	The updated template was obtained from Andrew beauchamp and used.
Findings	The updated template is allowable. No further action is needed. The item is addressed.
Item Number	95
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 6: Land Tenure

VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	Ownership and resource access/use rights are held by different entity(s) (eg, land is government owned and the project proponent holds a lease or concession)
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Risk Report, Land Tenure Section
Findings	The PD provides a description of the ownership circumstances, which is primarily government owned though some are owned by trusts. More documentation/direction is needed to confirm gov and trust ownership, and to confirm the communities rights to resources.
NCR/CL/OFI	NCR: Please provide greater detail regarding which properties are government owned, and which are owned by trusts. More specifically, please provide detail/direction regarding how this ownership information can be confirmed. Additionally please provide agreements or support documentation regarding the rights the communities are given and how this is formalized.
Response from Project Proponent	Community Lands Bill confers grazing and conservation rights to both trust and government lands. KWS has just provided registration guidleines for forming Conservancies. Ongoing management plans for Conservancies satisfy most of these requirements, other guidelines are in process of being met. Final community lands bill (pdf) in Administration and Land Rights folder **(response recevied from Mark 2017-04-21 "090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx").** Community Lands Bill confers grazing and conservation rights to both trust and government lands. KWS has just provided registration guidleines for forming Conservancies. Ongoing management plans for Conservancies satisfy most of these requirements, other guidelines are in process of being met. Final community lands bill (pdf) in Administration and Land Rights folder. KWS has still not developed procedures for finalizing land authority to the communities, but the Conservancies have pursued legal registration as Conservancies as far as is legally possible. **(response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").**
Findings	The PD mentions the Kenya Community Lands Act of 2016 in 3 places in the PD (Section 2.4, and in two places of Section 3.1). While it does state that the act confers ownership, it does not reference any language in the Act or describe how the act provides NRT (the project proponent) ownership. It simply states “Grazing and grazing resource (water, soil) rights are conferred by land ownership associated with Group Ranch status via Kenya Land Act of 1968 (revised in 1970) or by Africa customary law for communities on Trust lands via the Kenya

	Trust Land Act of 2010. These rights are further conferred and superseded by the Kenya Community Lands Act of 2016."
NCR/CL/OFI	NCR: Please clarify how NRT is granted ownership through the Kenya Community Lands Act of 2016, demonstrating that the Project Proponent has the unconditional, undisputed and unencumbered ability to claim that the project will or did generate or cause the project's climate, community and biodiversity benefits.
Response from Project Proponent	The legal basis for ownership is discussed in detail in sections 1.3.2 and 3.2 of the PD. Basically, Conservancies are legal entities (certified trusts recognized by the Kenya Revenue Service) that can sign contracts to benefit from conservation over geographically delineated areas (presented in their management plans). Certifications of trust, tax PINs and management plans for each Conservancy are available in a Dropbox folder https://www.dropbox.com/home/Carbon%20project%20documents/Conservancy%20legal%20documents
Findings	Table 1 of the PD lists community trusts and group ranches, some have applied to be "Group Ranches" under the Kenya Land (Group Representatives) Act of 1968. The "Conservancies" have rights under customary law conferred by Section VIII item 59 of the Kenya Trust Land Act of 2010 which is codified under the Community Lands Act of 2016. The Kenya Wildlife Conservation and Management Act of 2013 and Community Lands Act. of 2016 both establish right of use in support of activities which in turn support the carbon project. Documentation was provided to support the legal status of the entities involved in the carbon project. The item is addressed.
Item Number	96
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 6: Land Tenure
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	Mitigation: Project area is protected by legally binding commitment (eg, a conservation easement or protected area) to continue management practices that protect carbon stocks over the length of the project crediting period
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Risk Report, Land Tenure Section

Findings	Conservation easements were referenced but not provided.
NCR/CL/OFI	NCR: Please provide the conservation easements so the language can be reviewed. Note to obtain the mitigation score the easements will need to include language requiring continuation of the management practices that protect carbon stocks over the length of the project crediting period.
Response from Project Proponent	Letters of Intent to participate in the project(response recevied from Mark 2017-04-21 "090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx"). Letters of Intent to participate in the project are now available. These letters indicate the knowledge and willingness to engage in improved practices for 30 years. (response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").
Findings	The response seems to indicate an intent to claim the risk mitigation, however the risk report provided by the project specifically states that this finding is not applicable. If the intent is to claim the mitigation, please clarify how the letters of intent qualify as a " legally binding commitment (eg, a conservation easement or protected area) to continue management practices that protect carbon stocks over the length of the project crediting period". If the intent is not to claim the mitigation, as indicated by the risk report, please state that is the case in your response.
NCR/CL/OFI	NCR: Please clarify if the intent is to claim this mitigation score as the response seems to indicate an intent to claim the risk mitigation, however the risk report provided by the project specifically states that this finding is not applicable. NCR: If the intent is to claim the mitigation score, please clarify how the letters of intent qualify as a " legally binding commitment (eg, a conservation easement or protected area) to continue management practices that protect carbon stocks over the length of the project crediting period".
Response from Project Proponent	Conservancies control land use on the geographical area conscribed in their certification as Trusts or Group Ranches and have applied for official status as Conservancies under the Kenya Lands Act of 2016. This entitles them to own carbon credits produced by their conservation activities and receive benefits from conservation of natural resources and the ability to control livestock movements (certificates of trust, Tax PINs and management plans available as evidence). Their Letters of Intent, Management Plans with intent to conserve wildlife and improve rangelands in a geographical delineated area represent equivalent “protection” to a conservation easement.

Findings	The verification team understands that the mitigation score is applicable to a legally binding commitment, and the project has chosen to take this mitigation score. The response from the proponent doesn't indicate which portions of the Risk Tool v3.3 Section 2.3.1 6) or 7) the individual conservancies are able to satisfy for the project as a whole. The verification team reviewed the materials provided and could not determine whether an individual conservancy is able to meet the definition of a "protected area" as defined by the Risk Tool.
NCR/CL/OFI	CL: Please clarify how individual conservancies are able to satisfy the requirements of the Risk Tool in terms of "Protected Areas" in order to claim this mitigation score.
Response from Project Proponent	Conservancy status confers by legal requirement: (1) Kenya Constitution Article 60 (1): Land shall be managed in a manner that is equitable, efficient, productive and sustainable, including protection of ecologically sensitive areas. 2) Kenya Constitution, Article 69 (1&2): The State shall ensure sustainable exploitation, utilisation, management and conservation of the environment and natural resources, and ensure the equitable sharing of the accruing benefits. Every person has a duty to cooperate with state organs and other persons to protect and conserve the environment and ensure ecologically sustainable development and use of natural resources. 3) Kenya Wildlfie Sercie Wildlife Policy - "Wildlife resources will be managed as a key component of complex ecological systems, with the maintenance of ecosystem functions and ecological processes." Source https://kwcakenya.com/conservancies/conservancies-policies/ Managing livestock impacts through rotational and migratory grazing, which are agreed upon through the Letters of Intent from the Conservancies to NRT satisfy all those requirements.
Findings	The audit team understands that the "Community Lands Act of 2016" provides the basis for grazing and conservation rights of communities on both conservancy and trust lands. Different community-based land tenure laws exist in Kenya as explained by Section 1.3.2 of the PD. However, it is unclear if the Community Lands Act of 2016 (or other law asserting communities rights) can be considered a legally binding commitment for a protected area as it is a law which confers community rights. Further, it is unclear to the audit team whether trusts or conservancies have a role in enforcement (of a legally binding commitment) if the Community Lands Act of 2016 is considered a legally binding commitment.
Item Number	97
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 7: Community Engagement

VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	Less than 20 percent of households living within 20 km of the project boundary outside the project area, and who are reliant on the project area, have been consulted
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Risk Report, Community Section
Findings	The project proponent indicates that this element is not applicable. It is not clear how this element has been satisfied.
NCR/CL/OFI	NCR:Please provide evidence regarding how this element was assessed and determined to be not applicable.
Response from Project Proponent	Implementation of project would involve LESS encroachment of project livestock onto neighboring lands, as evidenced by SOCIAL Surveys?!
Findings	It could not be found within the Risk Report (required to be a stand alone document) where it quantitatively demonstrates that interviews with households living outside of the project area exceeded 20%. In order to not receive the score of 5 for this risk indicator, a quantitative demonstration is required.
NCR/CL/OFI	NCR: Within the Risk Report (required to be a stand-alone document) please provide a quantitative demonstration that interviews with households living outside of the project area exceeded 20%. If needed, please provide specific references to locations within supporting documentation so that it can be easily located.
Response from Project Proponent	It is noted in the Risk Report now to reflect that 20% of households outside the project zone were not interviewed. The appropriate risk score increase +5 is also noted
Findings	The project has taken this full score where interviews with households living outside of the project area did not exceeded 20%. The mitigation credit is allowable since the project is pursuing CCB certification Version 3. The item is addressed.
Item Number	98
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 7: Community Engagement
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	Mitigation: The project generates net positive impacts on the social and economic well-being of the local communities who derive livelihoods from the project area
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Risk Report, Community Section

Findings	The project is applying for CCB certification which would sufficiently confirm this element has been addressed. Pending successful completion of CCB validation.
NCR/CL/OFI	
Response from Project Proponent	New comparison of baseline to project data for community well-being clearly establishes this in section 6.2 of the PD
Findings	This item has been resolved as CCB has been successfully achieved.
Item Number	99
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 8: Political Risk
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	Governance score of -0.79 to less than -0.32
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Risk Report, Political Risk
Findings	Though the score category is correct, the Risk Report provided appears to have used the 2009-2013 scores. The most current year available is 2014, so the scores should be averaged for 2010-2014 (resulting in a value of -.67). The score in the Risk Report needs to be accurate and should be revised.
NCR/CL/OFI	NCR: Please revise the risk score for governance.
Response from Project Proponent	The risk score for 2011-2015 is -0.65. The number has been revised in the document
Findings	The tool requires that the most recent 5 years available are used, noting the most recent 5 years are 2012-2016. However calculating for these years yields the same risk score (-.62 yields a score of 4). Finding closed.
Item Number	100
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Natural Risks
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	Fire

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Risk Report, Natural Risk
Findings	While general knowledge of the region supports that this could be an appropriate score, the CCB standard states that "The frequency and significance of events shall be estimated based on historical records, probabilities, remote sensing data, peer-reviewed scientific literature, and/or documented local knowledge, such as survey data in project areas, and may include projected climate change impacts.". Accordingly appropriate evidence must be provided to substantiate the score.
NCR/CL/OFI	NCR: Please provide the evidence required by CCB to substantiate the risk score.
Response from Project Proponent	Analysis of MODIS burned area product by Nichoals Deere of the University of Kent (see available pdf, Fire History in Kenya," shows that fires are rare in Kenya
Findings	This document has not been received.
NCR/CL/OFI	CL: Please provide Fire History in Kenya.
Response from Project Proponent	Analysis of MODIS burned area product by Nichoals Deere of the University of Kent (see available pdf, Fire History in Kenya," shows that fires are rare in Kenya
Findings	This document has not been received.
NCR/CL/OFI	CL: Please provide Fire History in Kenya.
Response from Project Proponent	Map was published at a University of York website http://www.real-project.eu/er-1-fire/ and in a poster here http://www.real-project.eu/wp-content/uploads/2014/03/CMustaphi-poster-003websize.pdf. The poster pdf was sent with supporting documents.
Findings	The support for lack of fire in the project area and the significance/likelihood scores chosen were deemed reasonable. Grazing impacts keep fire at bay and this project is predicated on soils carbon. The item is addressed.
Item Number	101
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Natural Risks
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	Pest and Disease
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Risk Report, Natural Risk

Findings	While general knowledge of the region supports that this could be an appropriate score, the CCB standard states that "The frequency and significance of events shall be estimated based on historical records, probabilities, remote sensing data, peer-reviewed scientific literature, and/or documented local knowledge, such as survey data in project areas, and may include projected climate change impacts.". Accordingly appropriate evidence must be provided to substantiate the score.
NCR/CL/OFI	NCR: Please provide the evidence required by CCB to substantiate the risk score.
Response from Project Proponent	Plant diseases have very weak effects on overall production and species composition in diverse native savannas (Pagan et al 2011, http://journals.plos.org/plospathogens/article?id=10.1371/journal.ppat.1002796
Findings	The verifiers reviewed Pagan et al. 2011 and noted that the document was developed based on research in Central America.
NCR/CL/OFI	CL: Please clarify the appropriateness of utilizing a Central American research paper to support Kenyan plant diseases.
Response from Project Proponent	Plant diseases have very weak effects on overall production and species composition in diverse native savannas (Pagan et al 2011, http://journals.plos.org/plospathogens/article?id=10.1371/journal.ppat.1002796
Findings	The verifiers reviewed Pagan et al. 2011 and noted that the document was developed based on research in Central America.
NCR/CL/OFI	CL: Please clarify the appropriateness of utilizing a Central American research paper to support Kenyan plant diseases.
Response from Project Proponent	There are few papers that even discuss plant diseases in savanna plants. A Web of Science search ts=(East Africa and savanna and plant* and disease*) revealed just 3 papers. Only one, published since the last review, addresses the issue of plant disease in savanna plants. It suggests that disease effects will be very low due to the complex leaf chemistry of the dominant plants. The paper is in supporting documents.
Findings	The support for a score of 0 for pest and disease risks was reviewed and verifiers find the arguments for no loss risk reasonable. The scale of the project, adaptability of native grasses and plants, and low presence of diseases to affect foraging suggest no loss is an appropriate score to select. The item is addressed.
Item Number	102
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Natural Risks

VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	Extreme Weather – Changes in Weather Patterns
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Risk Report, Natural Risk
Findings	While general knowledge of the region supports that this could be an appropriate score, the CCB standard states that "The frequency and significance of events shall be estimated based on historical records, probabilities, remote sensing data, peer-reviewed scientific literature, and/or documented local knowledge, such as survey data in project areas, and may include projected climate change impacts.". Accordingly appropriate evidence must be provided to substantiate the score.
NCR/CL/OFI	NCR: Please provide the evidence required by CCB to substantiate the risk score.
Response from Project Proponent	The SNAP model averages over wet and dry years, and shows that one dry year does not reduce previous gains in soil carbon by much, Ritchie 2014, PeerJ https://peerj.com/articles/233/
Findings	The auditors reviewed Ritchie 2014, but could not locate any mention of one dry year's effect on previous gains in soil carbon.
NCR/CL/OFI	CL: Please clarify the location within Ritchie 2014 of the effect of one dry year on previous soil carbon gains.
Response from Project Proponent	The SNAP model averages over wet and dry years, and shows that one dry year does not reduce previous gains in soil carbon by much, Ritchie 2014, PeerJ https://peerj.com/articles/233/
Findings	The auditors reviewed Ritchie 2014, but could not locate any mention of one dry year's effect on previous gains in soil carbon.
NCR/CL/OFI	CL: Please clarify the location within Ritchie 2014 of the effect of one dry year on previous soil carbon gains.
Response from Project Proponent	The claim from the paper:The SNAP carbon model used to estimate soil carbon stocks for this project averages over drought years (Ritchie 2014 https://peerj.com/articles/233/) and thus produces an already drought-discounted claim of credits. We never claimed that it showed no impact of a single year of drought. What the paper shows is that, including drought years, the project activities should over time lead to carbon removals . The paper also provides a sensitivity analysis that suggests that soil carbon is least sensitive to rainfall compared to other factors. For example (this is NOT in the paper) if the SNAP model is run to simulate a worst-case scenario of the effect of drought (50% less rainfall) and failure to manage grazing (grazing intensity = 0.99) against a project scenario equilibrium SOC (e.g. 35 tons SOC/ha), the average carbon loss in one year is 0.23 tons C/year or 0.6%. I have added this result to the text in the Risk Report.

Findings	The project has considered only drought for this element and appears to be allowing for some leeway on this score due to the buffer granted by the SNAP model (drought years included). Given the relative impacts of drought conditions on SOC (at equilibrium) are low, the verification team considers drought an insignificant risk to carbon stocks. The item is addressed.
Item Number	103
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Natural Risks
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	Geological Risk)
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Risk Report, Natural Risk
Findings	While general knowledge of the region supports that this could be an appropriate score, the CCB standard states that "The frequency and significance of events shall be estimated based on historical records, probabilities, remote sensing data, peer-reviewed scientific literature, and/or documented local knowledge, such as survey data in project areas, and may include projected climate change impacts.". Accordingly appropriate evidence must be provided to substantiate the score.
NCR/CL/OFI	NCR: Please provide the evidence required by CCB to substantiate the risk score.
Response from Project Proponent	Geologicla studies suggest that intervals between surfce lava flows in the project area exceed 20,000 years, and there is no current surface lava flow Koyaguchi 1984 http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.923.8704&rep=rep1&type=pdf
Findings	The validation team reviewed the provided article. The article is sourced from a reputable organization (KURENAI), and states that intervals between laval flows in the Samburu Hills of Kenya are approximately 6 million years. This gives substantiation to the risk score applied by the project (No Loss, Once every 100 years or more, or risk is not applicable to the project area). This item is addressed.
Item Number	104
General Items	
General Items	Calculation worksheet broken links

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Various calc worksheets
Findings	Auditors noted that in several calculation worksheets there are links to external Excel worksheets. During file transfer these links can become broken and unintentionally alter calculations. It is strongly recommended these be removed and values stay sourced within the same worksheet.
NCR/CL/OFI	CL: Please ensure all calculation worksheets supplied for the audit do not contain links to external Excel worksheets for reasons noted in the finding.
Response from Project Proponent	All linked worksheets are in a single excel file so as to avoid broken links(response recevied from Mark 2017-04-21 "090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx"). All such worksheets are no longer linked to external files. Any transfer of data from one file to another is accomplished by copying data from one file to the other and noting its source in the new file. (response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").
Findings	All links appear to have been corrected in the latest version of calculation worksheets provided. The item is addressed.
Item Number	105
General Items	
General Items	Sentence structure
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD Various
Findings	Several instances of corrections needed for sentence structure were noted in the PD.
NCR/CL/OFI	CL: Please address the findings and update the PD to complete all incomplete sentences. Please identify all changes made.
Response from Project Proponent	The documents are now fully edited(response recevied from Mark 2017-04-21 "090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx"). The PD has been copyedited and errors fixed. (response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").
Findings	Incomplete sentences appear to have been fixed throughout the PD. The item is addressed.
Item Number	106
General Items	
General Items	Reference errors in PD

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD Various
Findings	Instances of "Error! Reference source not found" found throughout .pdf document of PD.
NCR/CL/OFI	CL: Please fix instances of "Error! Reference source not found" found throughout .pdf document of PD.
Response from Project Proponent	All references are now updated and links are secure(response recevied from Mark 2017-04-21 "090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx"). All those Error! Messages have been deleted. (response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").
Findings	Reference links to websites etc. have been fixed in the PD. The item is addressed. (response received from Mark 2017-04-21 "090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx"). A revised PD now has been provided and the ERROR messages have returned (example see page 54 of PD). (response received from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").
NCR/CL/OFI	CL: Please see the finding and address the "ERROR" messages that have returned since the previous version of the PD was edited.
Response from Project Proponent	This is some problem with converting the document from Word to pdf. This has been researched and fixed.
Findings	The following general items remain to be fixed in the PD: -Table 6 and Table 7 do not appear to exist in the PD, there are 2 Table 9s -Table of contents under Section 5.5.3 should be omitted
NCR/CL/OFI	CL: Please address the findings.
Response from Project Proponent	All Tables are accounted for and properly numbered and referenced in the text. The Table of Contents is refreshed and unwanted headings removed.
Findings	The formatting revisions are sufficient to address this request. The item is addressed.
Item Number	107
General Items	
General Items	Versions and dates for project documentation
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD, PIR

Findings	Auditors noted that project documents submitted for validation/verification lack consistent "date of issue" and versions. There is no requirement here, but an opportunity for improvement is issued to facilitate more efficient auditing.
NCR/CL/OFI	OFI: Auditors suggest consistently apply dates, versions as needed to facilitate an efficient audit.
Response from Project Proponent	Dates of issue and versions are consistent across documents (response recevied from Mark 2017-04-21 "090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx"). Documents have been checked and updated to reflect (response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").
Findings	No action required here but reporting documentation now reflects a date and version.
Item Number	108
General Items	
General Items	Table of contents
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD
Findings	There is no table of contents as required by the PD template.
NCR/CL/OFI	NCR: Please include a table of contents as required by the VCS template and to improve navigability.
Response from Project Proponent	The PD and MR now have Tables of Contents
Findings	The PD and MR are confirmed to have table of contents. Item addressed.
Item Number	109
General Items	
General Items	Incomplete sentences in the PD
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD
Findings	Section 4.5.2 of the PD contains an incomplete sentence, "These data, which reflect seasonal variation, annual variation in rainfall, and long-term trends in vegetation, clearly show that."
NCR/CL/OFI	CL: Please fix the noted incomplete sentence in the PD and ensure all sentences in project documentation are complete following the VCS template.

Response from Project Proponent	Table of Contents has been added to both the PD and MIR (response recevied from Mark 2017-04-21 "090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx"). Sentence is fixed. (response recevived from Mark 2018-02-01 "SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx").
Findings	TOC was confirmed added to the PD and MR. The item is addressed.
Item Number	110
VM0032 Version 1 - 16 July 2015 (Section)	8.4. Net GHG Emission Reduction and Removals
VM0032 Version 1 - 16 July 2015 (Description)	The net GHG benefit is calculated using the following equation: (see equation 21 on page 39 of the methodology for calculation of: Net GHG emission reductions and removals in year t (tCO2e))
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD, MR, NRT calculation worksheet
Findings	This is illustrated in the PD Section 5.6. NCCSt = PRSt following equation 20 since woody biomass was considered de minimis. Final values need re-checked at next round. The equation in question is used, and is equation 32 in the PDD, equation 35 in the MR. Equation 21 was not checked at this round due to outstanding issues elsewhere in the review.
NCR/CL/OFI	
Response from Project Proponent	
Findings	The file "NRT Soil Carbon Data and Removal Calculations v5.3 Dec 6 2019.xlsx" was reviewed to ensure calculations are correct in following VM0032. The following was noted: -parameter NCCSt and UNCCSt is incorrectly computed for year 2014 -parameter BEMt, UBEMt incorrectly transcribed from methane calc worksheet -parameter UPE was incorrectly computed, the audit team notes it was already computed within methane worksheet -leakage values from the leakage worksheet incorrectly transcribed -equations 21 and 52 were not followed correctly
NCR/CL/OFI	CL: Please address the findings and ensure all calculations are correct following VM0032.

Response from Project Proponent	The errors in NCCSt and UNCSSt were caused by the wrong Conservancies being assigned as participating. The correct entry of values of 1 in the table have been applied and calculations are now correct. The transcription errors for methane and leakage have been corrected. The UPEt error is caused by a sign error in the equation in the methodology. The methodology equations 52 and 21 imply that increases to methane emissions should be added to soil carbon removals when in fact they logically should be subtracted (see clarification email from Andrew Beauchamp @ Verra). Thus their treatment in the spreadsheet is correct but the equation in the methodology is not
Findings	The calculations have been corrected to follow methodological requirements. The item is addressed.
Item Number	111
VM0032 Version 1 - 16 July 2015 (Section)	
VM0032 Version 1 - 16 July 2015 (Description)	In such a simulation, parameter values are randomly chosen from hypothetical normal distributions with mean equal to the parameter value and the measured standard error around that mean. Once all the different parameter values for the model are generated from the hypothetical distributions, a model prediction is made. This process is repeated 100 or more times to produce a mean model prediction with a 95 percent confidence interval. For baseline SOC, the Monte Carlo simulation would generate an expected value of SOC and a 95 percent confidence interval.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD; NRT Calc worksheet
Item Number	112
VM0032 Version 1 - 16 July 2015 (Section)	
VM0032 Version 1 - 16 July 2015 (Description)	Uncertainties for each parameter in the model must be available to determine an overall uncertainty for PSOCeqm,j with a Monte Carlo simulation, as discussed in detail in Section 8.1.3.3.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD; NRT Calc worksheet
Item Number	113
VM0032 Version 1 - 16 July 2015 (Section)	8.2.3. Project Changes in SOC Density

VM0032 Version 1 - 16 July 2015 (Description)	Carbon typically accrues in response to management changes with decreasing increments over time as equilibrium is approached. Thus conservatively, the annual increment in SOC is determined by the difference in SOC between the conservative baseline maximum from 10 years prior to the project start (MSOCm,j,0) and project modeled equilibrium (PSOCeqm,j,t) divided by the time necessary to achieve project equilibrium (D). The project equilibrium must be determined assuming that project activities will be implemented. Thus, multiplying the annual increment in SOC (tons/ha), by the conversion of C to CO2 44/12 yields CO2e at that station. (See equation 13 on page 34 of the methodology for calculation of: Annual project removals due to changes in SOC stocks in stratum m in year t (tCO2e /ha))
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	NRT summary soil data.xls, exante removal calculations tab, columns F, D and H.
Findings	The spreadsheet shows that the calculations described were used. To be redone when soils are re-sampled.
NCR/CL/OFI	
Response from Project Proponent	Calculations have been redone in excel file "NRT Soils and Data Calculations v2, " worksheet "Calculating Removals" Column BA based on revised soil bulk densities.
Findings	Equation 13 is used in the calculation of the annual removals listed in column BC. The item is addressed.
Item Number	114
VM0032 Version 1 - 16 July 2015 (Section)	8.4.2.3 Total project uncertainty
VM0032 Version 1 - 16 July 2015 (Description)	The total project uncertainty UTt is calculated at the time of reporting through propagating the uncertainty in the baseline emissions and that in the project emissions and removals to year t:
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD; NRT Calc worksheet
Findings	UTt is calculated and reported in table 11, but is computed incorrectly, Uti is not a per strata parameter (Total project uncertainty (%)). Please see finding below.

Appendix B: Climate, Community and Biodiversity Standard Findings



Climate, Community and Biodiversity Project Design Standards – Third Edition Validation/Verification – Non-conformance/Clarification Requests Round 4

30 May 2019
Project No. VM14090.00

Validation/Verification Being Conducted by:

Environmental Services, Inc.
Forestry, Carbon, and GHG Services Division
Corporate Offices at:
7220 Financial Way, Suite 100
Jacksonville, Florida 32256
Phone: 904-470-2200; Fax: 904-470-2112



Summary of Validation/Verification Findings to Date 4
Validation/Verification Non-conformance/Clarification Request 5
General Section 5
G1 175
G2 187
G3 189
G4 205
G5 208
Climate Section 72
CL1 217
CL2 **Error! Bookmark not defined.**
CL3 **Error! Bookmark not defined.**
CL4 **Error! Bookmark not defined.**
GL1 224
Community Section 92
CM1 229
CM2 233
CM3 236
CM4 238
GL2 241
Biodiversity Section 133
B1 255
B2 262
B3 268
B4 270
GL3 273

SUMMARY OF VALIDATION/VERIFICATION FINDINGS TO DATE

	Criterion	Required/ Optional	Conformance Y/N N/A
	General Section		
G1	Project Goals, Design & Long-Term Viability	Required	Y
G2	-Without-Project Land Use Scenario & Additionality	Required	Y
G3	Stakeholder Engagement	Required	Y
G4	Management Capacity	Required	Y
G5	Legal Status and Property Rights	Required	Y
	Climate Section		
CL1	Without-Project Climate Scenario	Required	Y
CL2	Net Positive Climate Impacts	Required	Y
CL3	Offsite Climate Impacts	Required	Y
CL4	Climate Impact Monitoring	Required	Y
GL1	Climate Change Adaptation Benefits	Optional	Y
	Community Section		
CM1	Without-Project Scenario for Communities	Required	Y
CM2	Net Positive Community Impacts	Required	Y
CM3	Offsite Stakeholder Impacts	Required	Y
CM4	Community Impact Monitoring	Required	Y
GL2	Exceptional Community Benefits	Optional	Y
	Biodiversity Section		
B1	Without-Project Biodiversity Scenario	Required	Y
B2	Net Positive Biodiversity Impacts	Required	Y
B3	Offsite Biodiversity Impacts	Required	Y
B4	Biodiversity Impacts Monitoring	Required	Y
GL3	Exceptional Community Benefits	Optional	Y

Validation/Verification Non-conformance/Clarification Request
General Section

G1 Project Goals, Design and Long-term Viability

Indicator G1.1 – Identify the primary Project Proponent which is responsible for the project's design and implementation and provide contact details.	Key Contacts: Mark E. Ritchie, Ph.D., Soils for the Future, LLC, +1-315-447-1612, mritchie@soilsforthefuture.com Dr. Ritchie is the developer of the VCS SGMAFG methodology used in this project , as well as the developer of the SNAP soil carbon model used to determine changes in soil carbon as a consequence of planned rotational grazing management. He is the primary author of the PD and the Monitoring and Implementation Report and other project-related documents. He is also the project expert on carbon markets
Evidence Used to Assess Conformance:	PD V1 Section 1.4

Findings:	Section 1.4 defines the 4 major entities involved and defines the primary entity (Mark Ritchie with Soils For The Future) but does not specifically state that that is the project proponent.
Non-conformance Request (NCR):	Please specifically state in section 1.4 of the PD that Mark Ritchie with Soils For The Future is the "Project Proponent", or define another entity as such.
Date Issued:	16 Sept 2015
Project Proponent Response/Actions and Date:	Northern Rangelands Trust is stated as the project proponent in section 1.4 of PD version 1.1
Findings:	Version 2.1.2 of the PD states, "The **project proponent** is Soils for the Future, LLC (SftF) a carbon project developer that is responsible for the design and monitoring of project activities."
Non-conformance Request (NCR):	Assuming NRT is still the project developer, please say so in the PD.
Date Issued:	31 August 2018
Project Proponent Response/Action and Date: 2/12/2019	At the beginning of section 1.4, page 19 of the PD it now clearly states that NRT is the project proponent and lists their description first.
Evidence Used to Close NCR:	No further action is needed. The item is addressed.
Date Closed:	16 April 2019

Indicator G1.2 – Define the project's climate, community and biodiversity objectives.	The PD does not have a cover page defining the projects objectives.
Evidence Used to Assess Conformance:	PD V1
Findings:	Though the details are covered throughout the document the PD does not have a cover page defining the projects objectives.
Non-conformance Request (NCR):	Please insert a cover page listing the projects objectives as required in the CCB Rules.
Date Issued:	16 Sept 2015
Project Proponent Response/Actions and Date:	A Cover Page is provided at the beginning of PD version 1.1
Evidence Used to Close NCR:	A cover page is included in v2.1.2 of the PD. Item closed.
Date Closed:	31 August 2018

Indicator G1.3 – Provide the location (country, sub-national jurisdictions(s)) and a brief overview of the basic physical and social parameters of the project.	The project area is slightly more than 2 million ha of savanna grassland extending northward from the northern slopes of Mt. Kenya toward the Ethiopia border. The area consists of a series of former Group Ranches organized under the Northern Rangelands Trust to form wildlife Conservancies of various sizes (Fig. 1). The project zone includes the forested mountain ranges, which are protected forest reserves, found in the center of the project area, and other

	pastoral grazing lands to the east, west, and north. Private ranches on the Laikipia plateau lie to the southwest, and a belt of commercial farms lies to the south between the project area and the forests of Mt. Kenya National Park. The project area is bisected by the Ewaso Nyiro River, which arises from the Aberdare Mountains 600 km to the southwest and flows from west to east, providing the major permanent water source for the project zone.
Evidence Used to Assess Conformance:	PD V1 Section 1.2, figure 1
Findings:	The PD provides a description of the location and physical parameters of the project with a reference to a figure showing all conservancies. As the conservancies effectively define geographical and jurisdictional boundaries, all conservancies should be listed in this section by name.
Non-conformance Request (NCR):	Please list the names of all conservancies in this section.
Date Issued:	16 Sept 2015
Project Proponent Response/Actions and Date:	Table 1 lists the Conservancies along with location of headquarters, estimated population size, total area and project area in section 1.2 of the PD version 1.1 Fig. 1 shows the map and location of the Conservancies.
Evidence Used to Close NCR:	Table 1 of PD v2.1.2 lists the conservancies, as described by the project proponent. Item closed.
Date Closed:	31 August 2018

Indicator G1.4 - Define the boundaries of the Project Area where project activities aim to generate net climate benefits and the Project Zone where project activities are implemented.	The project area is slightly more than 2 million ha of savanna grassland extending northward from the northern slopes of Mt. Kenya toward the Ethiopia border. The area consists of a series of former Group Ranches organized under the Northern Rangelands Trust to form wildlife Conservancies of various sizes (Fig. 1). The project zone includes the forested mountain ranges, which are protected forest reserves, found in the center of the project area, and other pastoral grazing lands to the east, west, and north. Private ranches on the Laikipia plateau lie to the southwest, and a belt of commercial farms lies to the south between the project area and the forests of Mt. Kenya National Park. The project area is bisected by the Ewaso Nyiro River, which arises from the Aberdare Mountains 600 km to the southwest and flows from west to east, providing the major permanent water source for the project zone.
Evidence Used to Assess Conformance:	PD V1 Section 1.2, Figure 1

Findings:	The PD defines the boundaries of the Project Area where project activities aim to generate net climate benefits with a general description and figure, but the kml file provided appears to have errors (strata extend beyond boundaries) and has some inconsistencies with figure 1. Additionally, though the project describes the project zone, they do not provide any maps or figures of the actual bounds.
Non-conformance Request (NCR):	Please correct the kml file and figure 1 to ensure they are consistent and without error. Please add a figure to the PD showing the extent of the project zone and provide a kml of this boundary.
Date Issued:	16 Sept 2015
Project Proponent Response/Actions and Date:	Figure 1 has been revised to show the named Conservancies and their boundaries, the project area and its boundary and the project zone and its boundary. Files of type .kml as well as ESRI shape files have been provided for all boundaries.
Findings:	Figure 1 in v2.1.2 of the PD is a map depicting the project area, but no project zone is shown. It appears that the project proponent may be equating the project zone with the project area, based on other passages and figure captions in the PD.
Non-conformance Request (NCR):	Please provide the boundaries for the project zone, as defined in the CCB standards, Appendix B.
Date issued:	31 August 2018
Project Proponent Response/Action and Date: 2/12/2019	The CCB(v3) and VCS (v3) joint template states that the area encompassing the project area(s) in which project activities that **directly affect** land and associated resources, including activities such as those related to provision of alternate livelihoods and community development, are implemented. This area of project activities is all the land in the boundaries of the 14 Conservancies. These boundaries are clearly shown in Fig. 1.The caption to Figure 1 has been edited to: *Map of project zone (dashed boundary) including the 14 participating Conservancies in which project activities will occur.* The dashed boundary includes forests in which the project intends to reduce use by herders, rocky and mountainous areas where soils are too shallow to sequester carbon, and game reserves important to the High Conservation Value of the project in which the project intends to reduce use. We have added a single polygon that serves as the boundary for the project zone to the .kml files.

Evidence Used to Close NCR:	The project zone is now sufficiently illustrated and described in Figure 1 of the PD to satisfy the requirement and request. The item is addressed.
Date Closed:	16 April 2019

Indicator G1.5 - Explain the process of stakeholder identification and analysis used to identify Communities, Community Groups and Other Stakeholders.	Section 2.7 of the PD states the stakeholders of concern and provides a list of these stakeholders.
Evidence Used to Assess Conformance:	PD Section 2.7
Findings:	The PD provides a list of the stakeholders of concern, but does not explain the process of stakeholder identification and analysis used to identify the Communities, Community Groups and Other Stakeholders.
Non-conformance Request (NCR):	In the PD please explain the process of stakeholder identification and analysis used to identify the Communities, Community Groups and Other Stakeholders.
Date Issued:	16 Sept 2015
Project Proponent Response/Actions and Date:	Stakeholder identification is discussed in section 2.7 of PD version 1.1.
Evidence Used to Close NCR:	The PD states that NRT has identified all major community areas that are registered as conservancies and will participate in the project. Other stakeholders, including government offices and communities outside the project area, are mentioned. 'Within project' stakeholders were identified at monthly community meetings held by the conservancies, bi-annual meetings of grazing chairmen and coordinators, workshops and Conservancy HQs. 'Off-project' stakeholders were identified from public meetings in surrounding counties, conservancy chairmen who negotiate grazing rights with off-project communities, and interviews with government representatives.
Date Closed:	31 August 2018

Indicator G1.6 -List all Communities, Community Groups and Other Stakeholders identified using the process explained in G 1.5.	Section 2.7 of the PD states the stakeholders of concern and provides a list of these stakeholders.
Evidence Used to Assess Conformance:	Section 2.7 of the PD

Findings:	Pending response to NCR in Indicator G1.5
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	Indicator G1.5 was closed. Version 2.1.2 of the PD includes stakeholder communities within and without the project area, as well as government offices. Item closed.
Date Closed:	31 August 2018

Indicator G1.7 - Provide a map identifying the location of Communities and the boundaries of the Project Area(s), of the Project Zone, including any High Conservation Value areas (identified in CM1 and B1), and of additional areas that are predicted to be impacted by project activities identified in CL3, CM3 and B3.	A KML of the mapped communities has been provided. No map of the communities could be found within the PD. No mention/discussion of High Conservation Value areas could be found in the PD.
Evidence Used to Assess Conformance:	PD Section 6.1
Findings:	A KML file of the communities was provided but no map of any of the communities is found in the PD, nor is there a list or description of the specific communities within the project. No mention/discussion of High Conservation Value areas could be found in the PD.
Non-conformance Request (NCR):	Within the PD please include a map of the communities within the project and provide a list of the names of these communities. Please discuss the existence/lack of community based High Conservation Values.
Date Issued:	16 Sept 2015
Project Proponent Response/Actions and Date:	A map and list of the communities in the project area is now provided in section 1.2. A map of Conservation areas, to indicate High Conservation Values, is presented in section 2.4. The main settlements are identified in an attached .kml file and an excel file with GPS coordinates. Most settlements are merely collections of bomas, but they are listed in the excel file. A table of the main settlements and Conservancies they support is now in section 1.2 of the PD
Findings:	The map provided in section 1.2 of version 2.1.2 of the PD does not include the locations of communities, as specified by this indicator. Table 2 is a list of the communities. Section 1.3.1 includes a map of the

	project area, showing the locations of the communities listed. All three community-related HCVs are contained within the project area, but rather than localized areas, the entire project area serves as an HCV, providing critical ecosystem services (mostly graze for cattle), the ecosystem needed to carry on the traditional pastoral life/cultural identity, which is also fundamental to community livelihoods. A map is provided, showing important resources for biodiversity HCVs.
Evidence Used to Close NCR:	Sections 1.3.5 and 2.4 of the PD
Date Closed:	5 September 2018

Indicator G1.8 - Briefly describe each project activity and the expected outputs, outcomes and impacts of the activities identifying the causal relationships that explain how the activities will achieve the project's predicted climate, community and biodiversity benefits.	Section 1.1 of the PD describes the project benefits to climate, communities and biodiversity at a high level. Section 5, 6 and 7 of the PD further describe the project benefits for each element.
Evidence Used to Assess Conformance:	PD Section 1.1, section 5, 6 and 7
Findings:	The PD describes the project benefits and the anticipated outcomes for climate, communities and biodiversity.

Indicator G1.9 - Define the project start date and lifetime, and GHG accounting period and biodiversity and community benefits assessment period if relevant, and explain and justify any differences between them. Define an implementation schedule, indicating key dates and milestones in the project's development.	The project Start Date is December 10, 2012 (Date of TNC/NRT charter). The project crediting period is 30 years from the start date: from December 10, 2012 to December 9, 2042. This is the project lifetime. Table 2. Origination timeline for project participation by the 14 Northern Rangelands Trust Conservancies.
Evidence Used to Assess Conformance:	PD Section 1.6, 1.7
Findings:	Start date and project lifetime (crediting period) are clearly stated in the PD. While there is an origination timeline for project participation by the conservancies, there is no detailed implementation schedule with key dates and milestones in the projects development.
Non-conformance Request (NCR):	In the PD please define an implementation schedule with key dates and milestones in the projects

	development. Some of this information should include anticipated dates of verification, credit issuance, and monitoring events for climate, community and biodiversity elements.
Date Issued:	16 Sept 2015
Project Proponent Response/Actions and Date:	Table of milestones (Table 2) is now presented in section 2.2 of PD version 1.1
Findings:	**Table 4** of the PD v2.1.2 (not table 2) includes an implementation schedule, showing both dates the activities began and dates a particular activity is expected to begin. It notes that the second verification began on 9/1/2018 and that it was initiated on 3/1/2018. As the first verification is not yet complete, it is not possible for the second verification to be already underway. Please review **ALL** items in the implementation schedule and revise to ensure they are accurately reported/projected.
Non-conformance Request (NCR):	
Date Issued:	5 September 2018
Project Proponent Response/Action and Date: 2/12/2019	The schedule of implementation in Table 4 section 2.2 has now been updated to reflect the correct past and future dates of key project milestones.
Evidence Used to Close NCR:	The schedule of implementation, Table 4, was confirmed updated in the PD to be reflective of future milestones. This Indicator will remain pending until the PD is final. Update PD is not final
Date Closed:	6 January 2020

Indicator G1.10 - Identify likely natural and human-induced risks to the expected climate, community and biodiversity benefits during the project lifetime and outline measures needed and *taken* to mitigate these risks.	VCS Risk Report addresses the natural risks, and some of the human induced risks. Section 2.3 of the PD further describes the risks to project benefits, which are focused on failure to implement rotational grazing.
Evidence Used to Assess Conformance:	VCS Risk Report, PD Section 2.3
Findings:	The VCS Risk Report and PD address some of the risks, however CCB states that the risk analysis should “Include risks in the shorter and longer term, risks related to continued community willingness to participate in the project, risks related to ability to adapt to climate change and climate variability, etc.”
Non-conformance Request (NCR):	Please add language to the PD sufficient to address the finding.

Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	These longer-term risks are discussed in section 2.3
Evidence Used to Close NCR:	Section 2.3 of version 2.1.2 of the PD includes discussion of long-term project risks. The main risk is to community willingness to participate in the project and risks related to the ability of the communities to adapt to climate variability. Lack of land tenure is on factor that can discourage participation, but the PD states the recently passed Kenya Community Lands Act of 2016 should create drivers to encourage land stewardship. The challenge of managing rotational grazing is a risk, but is expected to be ameliorated when carbon revenues begin to support project activities. Item closed.
Date Closed:	5 September 2018

Indicator G1.11 - Describe the measures needed and *taken* to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime.	Language pertaining to measures needed and *taken* to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime could not be located.
Evidence Used to Assess Conformance:	PD
Findings:	Language needed pertaining to measures needed and *taken* to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime could not be located. This may either be because the language does not exist or due to the fact that there is no table of contents.
Non-conformance Request (NCR):	Please point to the language that addresses measures needed and *taken* to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime or add the appropriate language to the PD.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is now addressed at the end of section 2.3 of the PD
Findings:	While section 2.3 in v2.1.2 of the PD does appear to describe benefits of the project, it does not appear to describe the measures needed and taken to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime. This section currently states:

	"Rotational grazing management can be challenging to govern, **but with carbon revenues to support governance**, it should be able to continue long enough for community members to see the returns of implementation in the form of improved forage, greater surface water distribution, development of livestock value chains, etc." Further, Section 4.6 of the PD states that "scenario 3, planned rotational grazing, faces significant barriers in the absence of project funding." Specifically, as carbon financing is stated to be needed to support governance, how will the benefits continue to be maintained beyond the project lifetime (i.e. when carbon financing is no longer available)?
Non-conformance Request (NCR):	Please describe measures needed to maintain project benefits beyond the project's lifetime.
Date Issued:	5 September 2018.
Project Proponent Response/Action and Date: 2/12/2019	An expanded paragraph at the end of section 2.3 of the PD (pp 29-30) deals explicitly with this. A supporting document NRT Strategic Plan 2018-2022 is included in supporting files that accompany the revised PD.
Evidence Used to Close NCR:	The end of Section 2.3 of the PD now includes measures needed and taken to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime. For instance, support from carbon revenue is expected to build the lasting institutions for governance which are funded by other sources of revenue. The item is addressed.
Date Closed:	16 April 2019

Indicator G1.12 - Demonstrate that financial mechanisms adopted, including actual and projected revenues from GHG emissions reductions or removals and other sources, provide an adequate actual and projected flow of funds for project implementation and to achieve the project's climate, community and biodiversity benefits.	Project references a business plan in the risk report, but this document has not been provided.
Evidence Used to Assess Conformance:	PD Section 2.5, Risk Report
Project states breakeven calculated at year 2 and references a business plan, but this document has not been provided.	In the PD the project references the sources of funding, profit margins and anticipated price for carbon, but does not provide a project lifetime analysis of all costs and revenues sources

	discounted to NPV. The project references a business plan, but this document has not been provided.
Non-conformance Request (NCR):	Please provide the business plan documenting all costs, expenditures and revenue/funding sources. This cash flow/NPV analysis should be a spreadsheet or similar format covering the project lifetime (30 years).
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	Business plan is now available as a financial document accompanying the Non-Permanence Risk Report
	NKCP Business Plan document verbally describes the roles of the entities involved in the project, prices of carbon credits, potential returns and costs of running this carbon project. It includes graphical representations of expected costs, cash flow and margins, which show the project with a positive cash flow by the middle of 2018. However this plan anticipated validation and verification to be completed in 2017. The file NRT Carbon Proj anticipated cash flow.xlsx includes the spreadsheets used to derive the information summarized in the business plan document, including overall profit and loss, through 2020. Separate spreadsheets for individual years, through 2020, are included. The file NKCP quick summary financials.xlsx includes net revenues and allocations, expected through 2042. However, these values do not appear to be in NPV. If they are in NPV, it is unclear what discount rate is used. Additionally, the values (gross revenue, profit, etc.) in this spreadsheet for 2017 and 2018 do not appear to correspond with the NRT Carbon Proj anticipated cash flow.xlsx spreadsheet. Additionally, the business plan milestones are out of date in many/most areas (states val/ver completion in April/June 2017, etc.)
Clarification request (CL):	Please update the business plan and spreadsheets to account for val./ver. not completed in 2017. Please clarify if NPV was used and if so, what discount rate was used. Please correct the apparent discrepancies between the spreadsheet NRT Carbon Proj anticipated cash flow.xlsx and the file NKCP quick summary

	financials.xlsx for net revenue, profit and all other appropriate values. Please correct ALL milestones listed in the business plan.
Date issued:	5 September 2018
Project Proponent Response/Actions and Date:	The financial documents have been corrected and updated as requested. The revised files are included with the supporting files sent to the VVB.
Evidence Used to Close CL:	This CCB criteria is pending VCS Risk Tool findings for Financial Viability and Opportunity Cost. 2 June 2019: VCS Risk Tool findings are now closed.
Date Closed:	2 June 2019

Indicator G1.13 - Specify the Project Area(s) and Communities that may be included under the programmatic approach, *and identify any new Project Area(s) and Communities that have been included in the project since the last validation or verification against the CCB Standards.*	The project area is clearly defined by the maps provided. The project communities are listed under section 2.7 as "Buliqo Bulesa, Il Ngwesi, Kalama, Lekurruki, Leparua, Meibae, Melako, Mpus Kutuk, Naibunga, Nakuprat Gotu, Namunyak, Nasuulu, Sera, West Gate". The project is not a grouped or programmatic project and the instances included are static.
Evidence Used to Assess Conformance:	PD section 2.7
Findings:	The communities are listed but no maps or locations for these communities are provided within the PD.
Non-conformance Request (NCR):	Please include maps within the PD showing the locations of the communities impacted by the project.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	Maps are now in the PD, Fig. 1 and 2, showing Conservancies and main settlements
Evidence Used to Close NCR:	Figure 2 in section 1.3.1, of version 2.1.2 of the PD, includes a map showing the locations of the communities impacted by the project. Item closed.
Date Closed:	5 September 2018

Indicator G1.14 - Specify the eligibility criteria and process for project expansion under the programmatic approach *and demonstrate that these have been met for any new Project Areas and Communities that have been included in the project since the last validation or verification against the CCB Standards.*	N/A This is not a grouped or programmatic project and the instances included are static.

Evidence Used to Assess Conformance:	N/A
Findings:	N/A
Non-conformance Request (NCR):	N/A
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

Indicator G1.15 - Establish scalability limits, if applicable, and describe measures needed and *taken* to address any risks to climate, community and biodiversity benefits if the project expands beyond those limits.	N/A This is not a grouped or programmatic project and the instances included are static.
Evidence Used to Assess Conformance:	N/A
Findings:	N/A
Non-conformance Request (NCR):	N/A
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	

G2 Without-project Land Use Scenario and Additionality

Indicator G2.1 - Describe the most likely land-use scenario within the Project Zone in the absence of the project, describing the range of potential land-use scenarios and the associated drivers of land use changes and justifying why the land-use scenario selected is most likely. It is allowable for different locations within the Project Zone to have different without-project land use scenarios.	The PD describes the baseline scenario as continuous grazing. The PD further describes one alternative land use scenarios (Continuous, unplanned grazing).
Evidence Used to Assess Conformance:	PD section 2.2, section 4.6
Findings:	The PD does provide a comparison of the one alternative land use scenario against the project scenario, but does not identify any other potential scenarios. Specifically, as many of the project lands currently operate as a conservancy, why was this not considered as an alternative land use scenario (i.e. why is it not a credible scenario)?

Clarification Request (CL):	As many of the project lands are already conservancy lands, please clarify in the PD why operating as a conservancy was not considered as an alternative scenario (explain why this is not a credible scenario).
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	The option of using the land as just a Conservancy compared to unrestricted grazing and to the project scenario is addressed in section 4.6
Evidence Used to Close CL:	Section 4.6 of version 2.1.2 of the PD includes discussion of the option of operating the lands as a conservancy. Focusing on wildlife conservation, it is explained, would require some amount of destocking of livestock. Funding would come from tourism revenues. Wildlife and forage are declining in Kenya. Current conservancy management focuses on protecting wildlife through community game scouts. There may be a lack of capacity to support a thriving tourism trade. Significant human capacity barriers exist for tourism, as well as cultural barriers for reducing livestock numbers. The conservancy option is now discussed in the PD, and its unlikelihood explained. Item closed.
Date Closed:	5 September 2018

Indicator G2.2 - Document that project benefits including climate, community and biodiversity benefits would not have occurred in the absence of the project, explaining how existing laws, regulations and governance arrangements, or lack of laws and regulations and their enforcement, would likely affect land use and justifying that the benefits being claimed by the project are truly 'additional' and would not have occurred without the project. Identify any distinct climate, community and biodiversity benefits intended for use as offsets and specify how additionality is established for each of these benefits.	It is not clear where in the PD this is addressed.
Evidence Used to Assess Conformance:	PD Section 3

Findings:	Could not find a concise statement addressing this indicator.
Clarification Request (CL):	Please clarify where this information is provided in the PD.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is now addressed in the section 4.6 on additionality.
Evidence Used to Close NCR:	Section 4.6 of the PD states that scenario 3, planned rotational grazing, faces significant barriers in the absence of project funding. Coordination of the effort, necessary cash payments to professional herders and the lack of confidence in the safety of the animals are cited. Item closed.
Date Closed:	5 September 2018

G3 Stakeholder Engagement

Indicator G3.1 - Describe how full project documentation has been made accessible to Communities and Other Stakeholders, how summary project documentation (including how to access full documentation) has been actively disseminated to Communities in relevant local or regional languages, and how widely publicized information meetings have been held with Communities and Other Stakeholders.	The carbon project, whereby yet another benefit of planned rotational grazing is presented, has been communicated much more recently due to high uncertainty in the carbon market and a reluctance to raise hopes about potential revenues. However, the Conservancies began on 15 May 2015 a solicitation of participation and public comment period, with announcement and information about the project distributed by NRT grazing coordinators and other staff in the form of pamphlets, and a soon-to-be posted announcement on the NRT website (http://nrt-kenya.org) plus the front pages of each Conservancy linked to a blog site (http://nrtcarbonproject.wordpress.com) where the announcement also exists and anyone can post comments anonymously about it.
Evidence Used to Assess Conformance:	PD Section 6.1
Findings:	While the project has submitted pamphlets to communities in the project area and awareness of the project appears to be high, particularly due to the involvement of the community grazing committees, at the time of the site visit the local language summaries of the PD and PIR did not appear to have been distributed. When discussed with the project proponent they stated that the documents would be distributed after the site visit, and photographic evidence would be provided that all communities were reached.
Non-conformance Request (NCR):	Please provide evidence (i.e. date stamped georeferenced photos) that the PD and PIR have been posted and made available to all communities.

Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	Photo evidence that the project was announced in each Conservancy by posting documents at Conservancy headquarters is now available as files from each Conservancy. Feedback from community members was solicited by a text response to a mQlicker account.
Findings:	Photographs of what appear to be monitoring report summaries in ten conservancies were provided. Dates ranged widely, and it appears the date of the file is not necessarily the date the picture was taken, as shown by a time stamp on the photo from the Nakuprat Conservancy, which appears to have been taken in January of 2010. No georeferenced information was included in any of the files.
Non-conformance Request (NCR):	Please provide georeferenced photos and provide the dates they were taken. If necessary, explain which document or event the notices are announcing.
Date Issued:	5 September 2018
Project Proponent Response/Actions and Date:	Due to delays in completing the validation, the project has been re-posted for public comment in the project zone (February 15- March 15, 2019) at both Conservancy HQ's and at public announcement kiosks in major towns and villages. Photos with time stamps and associated GPS are available to the VVB through a linked Dropbox.
Evidence Used to Close NCR:	Photos with date stamps were provided to satisfy this request of multiple locations where the public comment announcement was posted. The item is addressed.
Date Closed:	18 April 2019

Indicator G3.2 - Explain how relevant and adequate information about potential costs, risks and benefits to Communities has been provided to them in a form they understand and in a timely manner prior to any decision they may be asked to make with respect to participation in the project.	This information could not be located.
Evidence Used to Assess Conformance:	PD
Findings:	Evidence could not be located in the PD showing that relevant and adequate information about potential costs, risks and benefits to Communities has been provided to them in a form they understand and in a timely manner prior to any decision they may be asked to make with respect to participation in the project.

Non-conformance Request (NCR):	Please provide evidence sufficient to demonstrate that this indicator has been met.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	Signature of Letters of Intent by Conservancy chairmen following multiple dialogue events explaining the project and what it would entail is evidence that community members are aware of the potential benefits and risks of the project. The risk of encroachment by herders from outside the project area is viewed as the biggest risk, but it a risk faced regardless of implementing grazing plans and so was considered acceptable.
Evidence Used to Close NCR:	Scanned copies of signed form letters from each of the 14 conservancy chairmen were provided to the auditors. The letters are in English, and they say that the conservancies understand what the project is about and why it was being done, including mention of expected revenues. It further states they are aware of commitments required and understand both consequences and potential benefits. Item closed.
Date Closed:	5 September 2018

Indicator G3.3 - Describe the measures taken, and communications methods used, to explain to Communities and Other Stakeholders the process for validation and/or verification against the CCB Standards by an independent Auditor, providing them with timely information about the Auditor's site visit before the site visit occurs and facilitating direct and independent communication between them or their representatives and the Auditor.	The measures taken could not be located. The communications methods would likely be the NRT framework in conjunction with the community grazing committees, grazing coordinators and rangers.
Evidence Used to Assess Conformance:	PD
Findings:	In the review of the PD or PIR we could not locate the measures taken, and communications methods used, to explain to Communities and Other Stakeholders the process for validation and/or verification against the CCB Standards by an independent Auditor, providing them with timely information about the Auditor's site visit before the site visit occurs and facilitating direct and independent communication between them or their representatives and the Auditor.

Non-conformance Request (NCR):	Please point to where the information addressing the indicator can be found, or include it within the PD, PIR or supplemental information.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	A history of workshops, community meetings and other education is available as evidence that such communications have occurred. Documents are available .
Findings:	In the field some communities knew about our (the verifiers) arrival while others did not. Accordingly more detail and an specific summary of the evidence supporting closure is needed from the project proponent here. The evidence described does not appear to have been provided, nor included in the PD or PIR.
Non-conformance Request (NCR):	Please include the information addressing this indicator in the PD or provide supplemental information.
Date Issued:	5 September 2018
Project Proponent Response/Actions and Date:	Two workshops explaining the project, the process of validation, and community expectations were conducted at Lewa and Kalama in April 2014 and in May 2015 prior to the first site visit in September 2015. Supporting document: “Northern Kenya Carbon Project Summary.doc.” These were attended by grazing coordinators and/or conservancy managers from 9 Conservancies, but not Melako, Leparua, Nasuulu and Nakuprat-Gotu, as these Conservancies had just barely signed up for the project and were not prepared to attend the meetings. In September 2017, a workshop was held at Lewa and attended by conservancy managers and rangeland coordinators from all 14 participating Conservancies. In this workshop the procedures involved in validating the project and for communities (see slide presentation NRT Carbon Workshop 2017.pdf)
Findings:	The materials provided substantiate the project’s adherence to this Indicator during the monitoring period. However, a description could not be found in the PD to explain to Communities and Other Stakeholders the process or measures or methods for validation and/or verification against the CCB Standards by an independent Auditor.
Clarification Request (CL):	Please direct the audit team to where this Indicator is described and satisfied in the PD, otherwise please include this description.
Project Proponent Response/Actions and Date: 4/27/2019	As indicated in section 2.3 of the PD and MR under Longer-term risks, the objective of the project to meet CCB climate, biodiversity and community standards,

	and the need for auditors to gather social data, was communicated to community members prior to both the 2015 and 2017 site visits during public comment periods, as well as a February-March 2019 public comment period. In addition, the specific objectives of the standards and the need for the social community managed monitoring program (Social CoMMs) was communicated to Conservancy chairpersons and grazing coordinators from all 14 Conservancies during the September 2017 workshop.
Evidence Used to Close CL:	Section 2.3 of the PD, version 2.1.4, includes mention that the communities are aware of the need to collect data for CCB monitoring reasons. Item closed.
Date Closed:	17 May 2019

Indicator G3.4 - Describe how Communities including all the Community Groups and Other Stakeholders have influenced project design and *implementation* through Effective Consultation, particularly with a view to optimizing Community and Other Stakeholder benefits, respecting local customs, values and institutions and maintaining high conservation values. Project proponents must document consultations and indicate if and how the project design and implementation has been revised based on such input. A plan must be developed and *implemented* to continue communication and consultation between the project proponents and Communities, including all the Community Groups, and Other Stakeholders about the project and its impacts to facilitate adaptive management throughout the life of the project.	Key social survey questions, both as household surveys and focus groups, were developed to measure the impacts of the project on communities and the development of natural, financial, physical, social, and human capital. The example questionnaires for focus groups and household surveys provides a summary of the key information that will be for comparing baseline to project scenarios and thus determining the project impact on local communities. For the baseline social assessment, focus groups were conducted in three Conservancies, Il Ngwesi, Kalama, Nakuprat-Gotu, covering four of the five major ethnic groups in the project area: Maasai, Samburu, Turkana, Borana. Household surveys were conducted in 1012 households within four Conservancies: Il Ngwesi, Kalama, Nakuprat-Gotu, Melako, and included significant samples of Maasai, Samburu, Turkana, Rendille, and a small sample of Borana. Future social data gathering will expand on this baseline to sample Samburu dominated communities in Namunyak, and Borana-dominated communities in Biliqo Bulesa and the total number of households to exceed 1500 households (nearly 15% of the households in the entire project area). Focus groups will be performed by TNC and NRT staff, while members of each Conservancy will be employed and trained to conduct household surveys in their home Conservancies as part of NRT's Social CoMMs initiative to develop self-monitoring capacity within each Conservancy.
Evidence Used to Assess Conformance:	PD Section 8.3.3

Findings:	It is clear an intensive survey process has been undertaken to gather community input, however it is not clear how this information was used to revise the project design and implementation as required by the indicator. Also while it is clear there will be future expansions to the social data collection, it is referenced as a "baseline". Reference is made to focus groups with conservancy members that will conduct household surveys in their home Conservancies but it is not clear how this data will be used. From the site visit it is clear that additional feedback will also continually be gathered through community grazing committees and grazing coordinators, but again it is not clear in the PD if there is a formal plan for how this data will be used to facilitate adaptive management throughout the life of the project.
Clarification Request (CL):	Please clarify where the plan required by the indicator can be found in the PD. If it is not in the PD, please include one that will address all elements of this indicator.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	The formal steps for incorporating social monitoring information into alterations of project design and operations is provided in section 6.1.4 of the PD.
Evidence Used to Close NCR:	Version 2.1.2 of the PD includes steps that have and will be taken to incorporate the results of surveys into project management plans and decisions, as follows: a. Responses to household surveys collected, with emphasis to include vulnerable and marginalized groups, notably women and the poorest 25%. b. Data will be analysed with regards to perceived risks and detriments of project activities. c. Actions to mitigate risks or detriments, as discovered from Social CoMMs data will be originated and discussed in quarterly carbon project management meetings. d. Operating procedures will be defined and updated on the basis of suggested actions from management meetings. As an example, the PD describes how fear of the risk of encroachment on project grazing lands was a main concern of stakeholders, prompting the project to address it through outreach to surrounding

	communities and a rapid response to conflicts between on and off-project grazers. Item closed.
Date Closed:	5 September 2018

Indicator G3.5 - Demonstrate that all consultations and participatory processes have been undertaken directly with Communities and Other Stakeholders or through their legitimate representatives, ensuring adequate levels of information sharing with the members of the groups.	On 15 May 2015 a solicitation of participation and public comment period, with announcement and information about the project distributed by NRT grazing coordinators and other staff in the form of pamphlets, and a soon-to-be posted announcement on the NRT website (http://nrt-kenya.org) plus the front pages of each Conservancy linked to a blog site (http://nrtcarbonproject.wordpress.com) where the announcement also exists and anyone can post comments anonymously about it. Finally, as part of baseline social data gathering, community elders, women and young herders (morani) were asked a series of questions in focus groups in three Conservancies, and over 1000 households were interviewed in a household survey of four Conservancies in October 2014.
Evidence Used to Assess Conformance:	PD section 6.1
Findings:	The PD describes the individuals met with (community elders, women and morani) but does not discuss why these individuals are legitimate representatives and does not discuss how the adequate levels of information sharing with the groups take place.
Non-conformance Request (NCR):	Please address the finding and provide information describing the community structure and the roles of the persons interviewed in the PD (community elders. Women, morani). Please describe the information flow in the project and how the lower level community members receive and provide information.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	Methods for selecting focus group participants is provided in section 8.1.5 of the PD.
Findings:	Version 2.1.2 of the PD includes an explanation of how focus groups were chosen and formed, which included village chairmen being asked to identify and invite individuals from vulnerable groups. No explanation regarding community structure or how information was to flow to lower level community members was provided beyond that within section 8.1.5. This section simply states “Key informants were identified from existing NRT administrative conduits, including village chairmen, grazing

	chairmen, and community public health professionals (if available). In addition key informants included community elders from various community committees, such as grazing and settlement allocation committees. Typically at least five key informants were interviewed from each Conservancy. Interview questions were similar in theme to those in household surveys, except that informants were asked to reflect their opinion of community-wide issues and needs." The reader of the PD needs to understand how legitimate representatives were included in the focus group, ensuring adequate levels of information sharing with the members of the groups.
Non-conformance Request (NCR):	Please provide description/clarification in the PD describing how the focus group participants selected are legitimate representatives, ensuring adequate levels of information sharing with the members of the groups.
Date Issued:	14 September 2018
Project Proponent Response/Actions and Date:	Focus group member selection is detailed in both sections 2.7 and 8.1.5 (p. 114)
Evidence Used to Close NCR:	Focus group selection methods are now appropriately described in Section 8.1.5 of the PD. This is one component in overall methods the project has been able to demonstrate that consultations and participatory processes have been undertaken directly with communities and information sharing with the members of the groups have occurred. The item is addressed.
Date Closed:	18 April 2019

Indicator G3.6 - Describe the measures needed and *taken* to enable effective participation, as appropriate, of all Communities, including all the Community Groups, that want and need to be involved in project design, implementation, monitoring and evaluation throughout the project lifetime, and describe how they have been implemented in a culturally appropriate and gender sensitive manner.	Though information related to this indicator exists in various places in the document, specific information to address the indicator could not be located.
Evidence Used to Assess Conformance:	PD
Findings:	Specific information addressing the indicator needs to be added to the PD.

Non-conformance Request (NCR):	Please address the finding by adding language in the PD to address all items of the indicator.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	Communities participate in the design of the project by making and implementing grazing plans. The procedure and community feedback involved in designing grazing plans is found in section 6.1.2 of the PD. Traditionally women are involved in household decisions to buy and sell livestock, particularly small stock and their influence is outlined in section 6.1.2. Evidence that women are involved in grazing plans and the consequences of grazing management is determined from household surveys.
Evidence Used to Close NCR:	Section 6.1.2 of version 2.1.2 of the PD describes the steps and meetings involved in making grazing decisions, which are regularly adjusted, depending on range conditions. The PD further explains that due to cultural divisions of labor, grazing issues are the purview of men. However, focus groups reveal that women influence decisions about livestock sales and the movement of livestock, within households. Women heads of households are contacted by village elders, if they have livestock holdings. It is unlikely that the project has the ability or resources to change certain aspects of Kenyan pastoral society to inject the influence of women into more grazing decisions. One aspect of the project where women might have influence is in the use of funds from the sale of carbon offset credits that will be distributed to the conservancies. No plan or decision making process for the use of the 60% of credit sales proceeds is discussed in project documentation. This item is addressed in greater detail in the CM section of the PD. As this indicator is less specific than the CM indicators, this item is closed.
Date Closed:	14 September 2018

Indicator G3.7 - Describe the measures needed and *taken* to ensure that the project proponent and all other entities involved in project design and implementation are not involved in or complicit in any form of discrimination or sexual	No reference to sexual harassment could be located in the PD.

harassment with respect to the project.	
Evidence Used to Assess Conformance:	PD
Findings:	Specific language needs to be added to the PD to specify the measures needed and *taken* to ensure that the project proponent and all other entities involved in project design and implementation are not involved in or complicit in any form of discrimination or sexual harassment with respect to the project.
Non-conformance Request (NCR):	Please include language in the PD sufficient to demonstrate that all elements of the indicator are addressed.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This information is addressed in the NRT human Resources Guidelines discussed in 6.1.5 of the PD
Evidence Used to Close NCR:	Section 6.1.5 of version 2.1.2 of the PD discusses the grievance procedure and does not discuss discrimination or sexual harassment. However, section 2.6 of the PD states, “Particular attention is placed on avoiding discrimination and sexual harassment. Procedures and policies are already established to avoid sexual harassment are in place for conservation game scouts, which regularly mix genders in isolated field settings, and the same policies apply to other workplaces, as specified in sections 11.1-11.5 of the NRT Human Resources policy.” Sections 11.1-11.5 of the NRT Human Resources Policy was available online from the link provided in the PD. The section on harassment begins, “NRCL is committed to providing a work environment that is free from any form of harassment, including sexual harassment and bullying. NRCL finds any form of harassment totally unacceptable and recognizes the adverse effect such behavior has both on people who work for NRCL as well as other stakeholders.” It goes on to define harassment and sexual harassment in the way it is commonly defined in the US, conditions that qualify as harassment and how to make a complaint about harassment. It assures confidentiality and no consequences for complaining and includes a range of sanctions for violators. Item closed.
Date Closed:	6 September 2018

Indicator G3.8 - Demonstrate that a clear grievance redress procedure has been formalized to address disputes with Communities and Other Stakeholders that may arise during project planning, implementation and evaluation with respect but not limited to, Free, Prior and Informed Consent, rights to lands, territories and resources, benefit sharing, and participation. The project shall include a process for receiving, hearing, responding to and attempting to resolve Grievances within a reasonable time period. The Feedback and Grievance Redress Procedure shall take into account traditional methods that Communities and Other Stakeholders use to resolve conflicts. The Feedback and Grievance Redress Procedure shall have three stages with reasonable time limits for each of the following stages. First, the Project Proponent shall attempt to amicably resolve all Grievances, and provide a written response to the Grievances in a manner that is culturally appropriate. Second, any Grievances that are not resolved by amicable negotiations shall be referred to mediation by a neutral third party. Third, any Grievances that are not resolved through mediation shall be referred either to a) arbitration, to the extent allowed by the laws of the relevant jurisdiction or b) competent courts in the relevant jurisdiction, without prejudice to a party's ability to submit the Grievance to a competent supranational adjudicatory body, if any. The Feedback and Grievance Redress Procedure must be	A grievance procedure could not be located.

publicized and accessible to Communities and Other Stakeholders. Grievances and project responses, including any redress, must be documented and made publicly available.	
Evidence Used to Assess Conformance:	PD
Findings:	No grievance procedure could be located.
Non-conformance Request (NCR):	Please add language to the PD sufficient to demonstrate that all elements of the indicator are addressed.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	Grievance Procedure is added to the PD in section 6.1.5
Evidence Used to Close NCR:	Section 6.1.5 of version 2.1.2 of the PD includes a detailed grievance procedure of 6 phases. The 6th phase calls for mediation by a neutral third party, if necessary, and then to a court of law. Item closed.
Date Closed:	6 September 2018

Indicator G3.9 - Describe measures needed and *taken* to provide orientation and training for the project's workers and relevant people from the Communities with an objective of building locally useful skills and knowledge to increase local participation in project implementation. These capacity building efforts should target a wide range of people in the Communities, with special attention to women and vulnerable and/or marginalized people. Identify how training is passed on to new workers when there is staff turnover, so that local capacity will not be lost.	The PD describes that professional training opportunities associated with project activities will include training in biodiversity surveys, wildlife counts, livestock husbandry, and social surveys.
Evidence Used to Assess Conformance:	PD section 6.2
Findings:	While the PD describes the type of training that will take place, it does not indicate the measures needed and taken to provide orientation and training for the project workers and how this will increase local participation in project implementation.
Non-conformance Request (NCR):	Please add language to the PD sufficient to demonstrate that all elements of the indicator are addressed.

Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	Training for rangeland coordinators and game scouts is included in section 6.1.1 of the PD
Findings:	Version 2.1.2 of the PD and MR state that general education regarding rotational grazing and the need for it was conducted 2009 – 2014 in different conservancies. Training in grazing management at the level of grazing committee members occurs annually. 3-hour workshops were given to women and elders in 10 villages in 2016. Section 6.2 of the PD lists training opportunities in biodiversity surveys, wildlife counts, livestock husbandry and social surveys as one of the project's net positive community impacts, but this sort of training is not discussed in section 6.1.1.
Clarification Request (CL):	Please include the efforts needed and taken (in the MR) to provide the training described as a net positive community impact, in section 6.2 of the PD and MR.
Date Issued:	6 September 2018
Project Proponent Response/Actions and Date:	No response provided.
Findings:	Please provide a response.
Clarification Request (CL):	CL: Please provide a response.
Date Issued:	4/25/19
Project Proponent Response/Actions and Date: 4/27/2019	A more detailed discussion of how trainings build human capital as one of the community benefits of the project is presented in item 4c in sections 6.2.3 of the PD and section 6.1.7 of the MR
Findings:	There is no section 6.2.3 of version 2.1.4 of the PD, nor is there a section 6.1.7 of the MR.
Clarification Request (CL):	Please provide a response to the clarification request of 6 September 2018.
Date issued	17 May 2019
Project Proponent Response/Actions and Date:	The community benefits are referenced in section 5.2 in the PD and 6.2 in the MR, including a more detailed discussion section 5.2.3 of the PD and 6.2.3 in the MR. The sections were incorrectly referenced in the previous round.
Findings:	Training benefits include funding for bursaries, which fund education for the poorest 25%, subsidies to support healthcare workers and teachers, employment opportunities on assorted technical teams required for carrying out the project, in combination with the training of these technical teams. Item closed.
Date closed:	2 July 2019

Indicator G3.10 - *Demonstrate* that people from the Communities are given an equal opportunity to fill all work positions (including management) if the job requirements are met. Explain how workers are selected for positions and where relevant, describe the measures needed and *taken* to ensure Community members, including women and vulnerable and/or marginalized people, are given a fair chance to fill positions for which they can be trained.	PD states "The relevant labour laws include…these have been and will continue to be implemented in the project through implementation of NRT's hiring policies, which include: 1. Open announcements of jobs associated with NRT and carbon project positions8. 2. Coverage of all employees under Workmen's Compensation
Evidence Used to Assess Conformance:	PD section 3.1
Findings:	An example of job listings was provided in the PD via hyperlink, but neither it nor the PD demonstrates how people from the Communities are given an equal opportunity to fill all work positions (including management) if the job requirements are met. Explain how workers are selected for positions and where relevant, describe the measures needed and taken to ensure Community members, including women and vulnerable and/or marginalized people, are given a fair chance to fill positions for which they can be trained. The PD references a "hiring policies" document, but it could not be located.
Non-conformance Request (NCR):	Please add language to the PD sufficient to demonstrate that all elements of the indicator are addressed.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is now discussed in section 3.1 of the PD
Findings:	Section 2.6 of version 2.1.2 of the PD and MR states that 45% of NRT staff come from the local conservancies, and they will actively seek employees from conservancy members. Further, jobs will be posted at conservancy HQs and the NRT website and standard job posting sites. Special attention will be given to applicants from vulnerable groups. The MR also states that 33% of NRT employees are women.
Clarification Request (CL):	Specifically, what is meant by "special attention" being given to applicants of vulnerable groups? Are there examples of any hires from vulnerable groups?

Date issued:	6 September 2018
Project Proponent Response/Actions and Date:	This is discussed in detail in section 3.1. The State of the Conservancies Report for 2017 notes that 30% of NRT positions are filled by women. This is equal to or above the national average which quotes 49% of women employed, which equivalent to 25% of jobs filled by women nationwide (see https://www.nation.co.ke/business/Women-still-far-behind-men-in-formal-jobs--says-study/996-4297410-os2qq7z/index.html. Furthermore, members of all the Conservancy ethnic groups are represented at NRT.
Evidence Used to Close NCR:	The audit team understands that "special attention" groups in this case are women and households without cattle. Although a specific example of a hire from these groups was not provided, the description in Section 3.1 clarifies the percentage of women in the proponent's workforce. The item is addressed.
Date Closed:	19 April 2019

Indicator G3.11 - Submit a list of all relevant laws and regulations covering worker's rights in the host country. Describe measures needed and *taken* to inform workers about their rights. Provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved.	PD states "Grazing and grazing resource (water, soil) rights are conferred by land ownership associated with Group Ranch status via Kenya Land Act of 1968 (revised in 1970) or by Africa customary law for communities on Trust lands via the Kenya Trust Land Act of 2010. Rights to benefit from soil conservation are conferred by the right to register lands as Conservancies by the Kenya Wildlife Conservation and Management Act of 2013 (see also section 1.3.2). The relevant labour laws include the Employment Act (Cap.226); the Regulation of Wages and Conditions of Employment Act (Cap. 229); the Trade Unions Act (Cap. 233), the Trade Disputes Act (Cap. 234), the Workmen's Compensation Act (Cap. 236), These have been and will continue to be implemented in the project through implementation of NRT's hiring policies, which include: 1. Open announcements of jobs associated with NRT and carbon project positions8. 2. Coverage of all employees under Workmen's Compensation The project has been registered with and reviewed by the National Environmental Management Authority
Evidence Used to Assess Conformance:	PD section 3.1
Findings:	The PD provides a list of the relevant laws but does not describe measures needed and *taken* to inform workers about their rights. Provide assurance that the project meets or exceeds all applicable laws and/or

	regulations covering worker rights and, where relevant, demonstrate how compliance is achieved. The PD references a "hiring policies" document, but it could not be located.
Non-conformance Request (NCR):	Please add language to the PD sufficient to demonstrate that all elements of the indicator are addressed.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	Conservancy rights conferred by law, e.g., the Wildlife Act of 2013 and the Kenya Community Lands Act of 2016, were communicated at Conservancy managers meetings in Isiolo. Hiring policies and worker rights are covered by the NRT Human Resources Policy and Procedure Manual https://static1.squarespace.com/static/5653e896e4b0a689b3fafd97/t/56bdc8c7859fd0e5ed8c2a57/1455278301174/HR-Policy-and-Procedures-Manual-November-2015-+%281%29.pdf, as mentioned in section 3.1 of the PD
Findings:	The policy and procedure manual states, "All employees are required to read and sign the Letter of Employment. This letter sets out the general contractual obligations which are legally binding between the Company and each individual employee. All material alterations to the Letter of Employment require the signatures of both parties unless otherwise stated." The forward of the manual implies that all employees receive it and are expected to know policies and procedures. The manual spells out general terms of employment (but the appointment letter supersedes anything in the manual), the way employees are to be treated and the way they are to treat each other. The manual appears to be written in order to follow laws and regulations regarding workers rights, but does not say so.
Clarification Request (CL):	Please provide assurance that the NRT's HR Policies and Procedures Manual outlines workers' rights and whether all employees receive the manual upon hiring.
Date issued:	6 September 2018
Project Proponent Response/Actions and Date:	This is discussed in an expanded section 3.1
Evidence Used to Close CL:	The description in Section 3.1 of the PD now elaborates further on how the NRT Manual outlines workers rights. The item is addressed.
Date Closed:	19 April 2019

Indicator G3.12 - Comprehensively assess situations and occupations that might arise through the implementation of the project and pose a substantial risk to worker safety. Describe measures needed and *taken* to inform workers of risks and to explain how to minimize such risks. Where worker safety cannot be guaranteed, project proponents must show how the risks are minimized using best work practices in line with the culture and customary practices of the communities.	All NRT and Conservancy endeavors are required by their charter to follow the 2007 Kenya Occupational Safety Act 7. Compliance is monitored by NRT human resources staff. Field employees are provided with functioning 4WD vehicles with licensed, trained drivers and/or motorcycles for navigating on and off road with helmets and other protective gear. Staff work in pairs for safety and the ability of a partner to transport another to health care providers distributed among different Conservancies. Game scouts are highly trained and provided uniforms, rifles, operating radios, and other appropriate field gear, and also work in teams transported, if necessary by trained and licensed drivers.
Evidence Used to Assess Conformance:	PD section 2.6
Findings:	The PD describes some of the measures in place to protect employees. The information provided does not describe all occupations and associated risks.
Non-conformance Request (NCR):	Please provide a full description of all occupations provided by the project, list the specific risks associated with these occupations, and specific mitigation measures in place for each (e.g.. occupation: rangelands coordinator; risks: attacks from wildlife, attacks from tribal retaliation or robbery; mitigation: work/travel in teams, rifles, operating radios, etc.).
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is now provided in section 6.1.1 of the PD
Findings:	Section 6.1.1 of version 2.1.2 of the PD discusses education and training in grazing management. Section 2.6 discusses employment opportunities and worker safety. A full description of occupations provided by the project and their associated risks and mitigation for these risks, was not provided.
Non-conformance Request (NCR):	Please respond fully to the original NCR.
Date issued:	6 September 2018
Project Proponent Response/Actions and Date: 3/2/2019	This is discussed on pp. 85-86 in section 6.1.1
Evidence Used to Close NCR:	The descriptions in the PD are sufficient to satisfy this Indicator. The item is addressed.
Date Closed:	19 April 2019

G4 Management Capacity

Indicator G4.1 - Describe the project's governance structures, and	Roles for major entities involved are listed and described. NRT is the entity who facilitates and

roles and responsibilities of all the entities involved in project design and implementation. For projects using a programmatic approach, identify any new entities included in the project since the last validation or verification against the CCB Standards.	coordinates a governance relationship with multiple indigenous communities across the 2 million ha project zone. Programmatic approach not applied as not a grouped project.
Evidence Used to Assess Conformance:	PD section 1.4
Findings:	Definition of roles is sufficient. While it is clear NRT is the entity who provides governance, more information is needed in the PD to define the governance structure; specifically the flow of information through the various roles for employees.
Non-conformance Request (NCR):	Please address the finding by providing more information on governance structures.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This information is provided in the NRT Human Resources Policy 2016.
Findings:	No information regarding the governing structure of the project or flow of information was found in the NRT HR manual.
Non-conformance Request (NCR):	Please provide a description of the governing structure of the project. This may include an illustration of the organizational flow chart.
Date issued:	6 September 2018
Project Proponent Response/Actions and Date:	Governing structure of the project is provided in section 8.1.1. Fig. 26 shows how different tasks are allocated to the different project proponents and Fig. 27 shows how different groups and agents within Conservancies influence project activities.
Evidence Used to Close NCR:	Figure 26 in the PD satisfies this requirement. The item is addressed.
Date Closed:	19 April 2019

Indicator G4.2 - Document key technical skills required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills. Document the management team's expertise and prior experience implementing land management and carbon projects at the scale of this project. If relevant experience is lacking, the proponents must either demonstrate how other organizations	PD provides a full listing of the experience of the entities involved.

are partnered with to support the project or have a recruitment strategy to fill the gaps.	
Evidence Used to Assess Conformance:	PD section 1.4
Findings:	The PD has sufficient detail for the experience of the entities involved in the project. It does not specifically list the key technical skills required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills.
Non-conformance Request (NCR):	Within the PD please list the key technical skills required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is now addressed by additional language in section 1.4.
Evidence Used to Close NCR:	Section 1.4 of version 2.1.2 of the PD lists the entities involved in the project and their experiences. Key technical skills required to implement the project were not described.
Non-conformance Request (NCR):	Please provide a list of the skills needed to implement the project, as per the original NCR.
Date issued:	6 September 2018
Project Proponent Response/Actions and Date: 2/15/2019	Skills are now specifically mentioned in section 1.4 associated with each project proponent, including community engagement, livestock management advice biodiversity assessment and carbon measurement and monitoring skills, marketing, sales transactions
Evidence Used to Close NCR:	The skills of the proponent and partners are well supported as determined by the project management score for the VCS Risk Tool. The descriptions in the PD are sufficient to address the finding and satisfy the Indicator. The item is addressed.
Date Closed:	19 April 2019

Indicator G4.3 - Document the financial health of the implementing organization(s). Provide assurance that the Project Proponent and any of the other entities involved in project design and implementation are not involved in or are not complicit in any form of corruption such as bribery, embezzlement, fraud, favoritism, cronyism, nepotism,	The majority of this information is provided in the risk report. Additional missing information has been requested in the VCS NCRs.

extortion, and collusion, and describe any measures needed *and taken* to be able to provide this assurance.	
Evidence Used to Assess Conformance:	VCS Risk Report
Findings:	The majority of this information is provided in the risk report. Additional missing information has been requested in the VCS NCRs, however VCS does not require a description of the measures needed and taken to provide assurance that the Project Proponent and any of the other entities involved in project design and implementation are not involved in or are not complicit in any form of corruption such as bribery, embezzlement, fraud, favoritism, cronyism, nepotism, extortion, and collusion.
Non-conformance Request (NCR):	Please provide language in the PD regarding the measures needed and taken to provide assurance that the Project Proponent and any of the other entities involved in project design and implementation are not involved in or are not complicit in any form of corruption such as bribery, embezzlement, fraud, favoritism, cronyism, nepotism, extortion, and collusion. Also pending VCS NCRs on the VCS Risk Report
Date Issued:	06 September 2018
Project Proponent Response/Actions and Date: 2/15/2019	Specific mention that the project proponents and and any of the other entities involved in project design are not engaged in malfeasance, as detailed in the finding above. This specific discussion is in section 3.8, p.37.
Evidence Used to Close NCR:	This Indicator has been satisfied through descriptions in the PD Section 3.8. The item is addressed.
Date Closed:	19 April 2019

G5 Legal Status and Property Rights

Indicator G5.1 - Describe and map statutory and customary tenure/use/access/management rights to lands, territories and resources in the Project Zone including individual and collective rights and including overlapping or conflicting rights. If applicable, describe measures needed and *taken* by the project to help to secure statutory rights. *Demonstrate* that all Property Rights are recognized, respected, and supported.	The PD provides a description of the types of land tenure and resource rights that exist on the project areas and throughout the region. It lists the ownership associated with each community (exist as or have applied for registration as Group Ranches under the Kenya Land; alternatively Conservancies are located on Trust lands, which confer rights to grazing and by inference resources that promote grazing.

Evidence Used to Assess Conformance:	PD section 1.3.2
Findings:	Description of types of ownership and the communities that hold them is detailed. Through the VCS review process NCRs have been issued regarding demonstration of this ownership, conflicting use rights. It is not needed to issue these NCRs twice.
Non-conformance Request (NCR):	Pending VCS NCRs regarding ownership.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	PD updated to include consequences of new Kenya Community Lands Act of 2016
Evidence Used to Close NCR:	Ownership findings within the VCS review have been addressed. The item is addressed.
Date Closed:	19 April 2019

Indicator G5.2 - *Demonstrate* with documented consultations and agreements that a. the project will not encroach uninvited on private property, community property, or government property, b. the Free, Prior, and Informed Consent5 *has been obtained* of those whose property rights are affected by the project through a transparent, agreed process. Free, Prior and Informed Consent is defined as: - **'Free'** means no coercion, intimidation, manipulation, threat and bribery; - **'Prior'** means sufficiently in advance of any authorization or commencement of activities and respecting the time requirements of their decision-making processes; - **'Informed'** means that information is provided that covers (at least) the following aspects a. the nature, size, pace, reversibility and scope of any proposed project or activity; b. the reason/s or purpose of the project and/or activity;	The PD provides descriptions of the types of ownership involved and voluntary nature of the project. The project will provide appropriate compensation through the improvement in grazing lands, job creation, cash payments and other benefits listed in section 6.2 of the PD.

c. the duration of the above; d. the locality of areas that will be affected; e. a preliminary assessment of the likely economic, social, cultural and environmental impact, including potential risks and fair and equitable benefit sharing in a context that respects the precautionary principle; f. personnel likely to be involved in the execution of the proposed project (including Indigenous Peoples, private sector staff, research institutions, government employees, and others); and g. procedures that the project may entail; and - **'Consent'** means that there is the option of withholding consent and that the parties have reasonably understood it. - Collective rights holders must be able to participate through their own freely chosen representatives and customary or other institutions following a transparent process for obtaining their Free, Prior and Informed Consent that they have defined. c. appropriate restitution or compensation has been allocated to any parties whose lands have been or will be affected by the project.	
Evidence Used to Assess Conformance:	PD section 1.3.2, 3.7 and 6.2
Findings:	While detailed information is provided, information relating to encroachment by the project could not be located.
Clarification Request (CL):	Please clarify where the required statements relating to encroachment by the project can be found in the PD.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This now addressed in section 4.2 of the PD as part of applicability condition (3) relating to control of livestock within project area borders.

Findings:	Section 4.2, (3) of the PD states that encroachment onto private lands is discouraged by payment of lease fees to the owners. Part c of this indicator is addressed. No documented consultations or agreements were provided to show the project will not encroach on private, community or government property.
Clarification Request (CL):	See findings. Please respond to part (a) of this indicator. Specifically, "*Demonstrate* with documented consultations and agreements that… the project will not encroach uninvited on private property, community property, or government property,"
Date issued:	6 September 2018
Project Proponent Response/Actions and Date:	Most of these agreements are made in local unwritten languages, so direct eveidence is largely not available. However reports to Conservancy Boards mention such agreements, and such agreements are also mentioned in the Mid-Year Technical Report on NRT Operational Plan 2018. See https://www.dropbox.com/home/CCB%20%20Documents/Peace%20document?preview=Technical+Reporting+Template_Annual+Report+(1)+ELIJA.docx
Evidence Used to Close CL:	While formal agreements for demonstration do not exist due to language and literacy barriers, it is clear from the referenced document, the PD and the monitoring reports, and from the interviews conducted during the onsite visits that considerable efforts have been taken and are ongoing to ensure there is no encroachment by the project on to no project lands. The participatory conflict and resource mapping is an additional tool to accomplish this goal. This finding is closed on the processes and evidence provided and witnessed. That stated, while onsite it was also clear that there were conflicts over shared resources, both on and offsite. To ensure this is continually tracked, a forward action request is being issued.
Forward Action Request (FAR):	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 that exist over dispute of land ownership and usage rights.
Date Closed:	2 July 2019

Indicator G5.3 - *Demonstrate* that project activities do not lead to involuntary removal or relocation of	As indicated by section 3.7 of the PD, "Participation in this project is completely voluntary. Participation by community members is presumably motivated by the

Property Rights Holders from their lands or territories, and does not force them to relocate activities important to their culture or livelihood. If any relocation of habitation or activities is undertaken within the terms of an agreement, the project proponents must *demonstrate* that the agreement was made with the Free, Prior, and Informed Consent of those concerned and includes provisions for just and fair compensation.	prospect of benefits to forage availability, livestock health and marketability in addition to benefits to community infrastructure and retention of land rights. The decision about where and when to move livestock will be made by community decision-making process through existing mechanisms of livestock management, and not by NRT, TNC, or other project proponents. The voluntary nature of the decision has been made clear by the announcement of the project during the public comment period during consultations with key informants, opinion leaders, and community administrative leaders. Individual conservancies may, on their own volition, choose to relocate settlements within their Conservancy, but this will follow established mechanisms of decision-making within the community. At no time will NRT, SFF, or TNC request community members to relocate. This will be made clear by the announcement of the project during the public comment period through consultations with key informants, opinion leaders, and community administrative leaders."
Evidence Used to Assess Conformance:	PD section 3.7
Findings:	The PD sufficiently states that project activities do not lead to involuntary removal or relocation of Property Rights Holders from their lands or territories within the project areas, and does not force them to relocate activities important to their culture or livelihood.

Indicator G5.4 - Identify any illegal activities that could affect the project's climate, community or biodiversity impacts (e.g. illegal logging) taking place in the Project Zone and describe measures needed and *taken* to reduce these activities so that project benefits are not derived from illegal activities.	PD section 3.8 states "The project depends on voluntary actions by community members to herd livestock according to planned rotational grazing principles. By communal grazing rights afforded to each Group Ranch, altered grazing management is a legal activity. Monitoring of biodiversity involves no capturing or handling of vertebrates, and sampling of plants and insects is not covered under Institutional Animal Care regulations. Human surveys by NRT staff are covered under research methods approved by an external Institution Review Board covering TNC and NRT-sponsored social science research."
Evidence Used to Assess Conformance:	PD section 1.3.3 3.8
Findings:	The PD addresses that all project activities are legal and identifies cattle raids, inter-tribal killing, non-sanctioned grazing, and poaching as illegal activities that would affect the project benefits. These area addressed through increased armed rangers, better

	community communication and rangeland coordinators and grazing committees.

Indicator G5.5 -Identify any ongoing or unresolved conflicts or disputes over rights to lands, territories and resources and also any disputes that were resolved during the last twenty years where such records exist, or at least during the last ten years. If applicable, describe measures needed and *taken* to resolve conflicts or disputes**.** *Demonstrate* that no activity is undertaken by the project that could prejudice the outcome of an unresolved dispute relevant to the project over lands, territories and resources in the Project Zone.	The PD lists tribal killings and cattle raids, intrusion for water resources, as well as poaching and unsanctioned grazing from outside the communities as potential conflicts.
Evidence Used to Assess Conformance:	PD section 1.3.3
Findings:	The PD lists the potential areas of conflict, but does not concisely list any current or historic conflicts that are ongoing or have been resolved, nor does it describe the full measures needed and taken to resolve conflicts or disputes. Section 6.2 does state that reduction in drought will assist with reductions in cattle raids, but a section needs to be added listing specific conflicts and methods to address these conflicts. Also as required, please show where it is demonstrated that no activity is undertaken by the project that could prejudice the outcome of an unresolved dispute relevant to the project over lands, territories and resources in the Project Zone.
Non-conformance Request (NCR):	Please add language to the PD sufficient to address the findings.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	NRT methods to resolve conflicts is discussed in section 3.8 relative to illegal activities.
Findings:	Section 3.8 of version 2.1.2 of the PD states, “Traditional pastoralist practices of stealing livestock, armed takeover of grazing areas or water points, or killing pastoralists of other ethnic groups will not be tolerated. Conflicts, when they do exist have been and will be addressed by combined NRT, Conservancy, and County government response teams. When

	response team intervention fails to resolve the conflict, NRT calls a peace meeting13, such as occurred in July of 2015. Peace meetings have highly successful in reducing conflict in the area since the advent of NRT in 2008." It appears the measures needed to resolve conflicts or disputes was provided. No information regarding current or past conflicts, or whether project activities could affect the outcome of a dispute was provided.
Non-conformance Request (NCR):	See findings and previous NCR and findings. Please provide a list of current and past conflicts and their resolution, if any. Demonstrate no project activity could prejudice the outcome of an unresolved dispute.
Date issued:	6 September 2018
Project Proponent Response/Actions and Date: 2/15/2019	A review of resolved conflicts is provided in the report The Mid-Year Technical Report on NRT Operational Plan 2018 also discusses many of these efforts. https://www.dropbox.com/home/CCB%20%20Documents/Peace%20document?preview=Technical+Reporting+Template_Annual+Report+(1)+ELIJA.docx. In section 1.3.3 on p. 16 of the PD., language has been added to demonstrate that project activities cannot affect the outcome of disputes
Evidence Used to Close CL:	Ongoing and unresolved disputes were identified (e.g.) as ethnic groups stealing from one another and grazing land disputes during the dry season. It is hard for the audit team to imagine project activities not affecting grazing land disputes, although it is expected to be positive. Measures for resolving conflicts are described as peace meetings etc. The project has been able to sufficiently demonstrate that no activity is undertaken by the project that could prejudice the outcome of an unresolved dispute relevant to the project over lands, territories and resources in the Project Zone. The item is addressed.
Date Closed:	20 April 2019

Indicator G5.6 - Submit a list of all national and local laws and regulations in the host country that are relevant to the project activities. Provide assurance that the project is complying with these and, where relevant, demonstrate how compliance is achieved.	PD states "Grazing and grazing resource (water, soil) rights are conferred by land ownership associated with Group Ranch status via Kenya Land Act of 1968 (revised in 1970) or by Africa customary law for communities on Trust lands via the Kenya Trust Land Act of 2010. Rights to benefit from soil conservation are conferred by the right to register lands as Conservancies by the Kenya Wildlife Conservation and Management Act of 2013 (see also section 1.3.2).

	The relevant labour laws include the Employment Act (Cap.226); the Regulation of Wages and Conditions of Employment Act (Cap. 229); the Trade Unions Act (Cap. 233), the Trade Disputes Act (Cap. 234), the Workmen's Compensation Act (Cap. 236)"
Evidence Used to Assess Conformance:	PD section 3.1
Findings:	The PD provides a list of the laws relevant to the project. There appear to be a few other laws that may be relevant, including: ● National Hospital Insurance Fund Act, 1998 ● Companies Act, (Law of Kenya Cap. 486). CAAC is registered as a branch and is in good standing to operate in Kenya. ● Environmental Management and Co-ordination Act, 1999. In conformance with the Act, TIST submitted an EIA to the National Environmental Management Authority (NEMA). ● The Trespass Act (Law of Kenya Cap. 294)
Non-conformance Request (NCR):	In the PD please review the laws indicated in the findings and discuss how they impact the project and how they are complied with.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	These laws were added to the discussion in section 3.1 of the PD
Evidence Used to Close NCR:	Section 3.1 of version 2.1.2 of the PD includes a brief discussion on how these laws might affect the project. Item closed.
Date Closed:	6 September 2018.

Indicator G5.7 - Document that the project has approval from the appropriate authorities, including the established formal and/or traditional authorities customarily required by the Communities.	The PD provides descriptions of the types of ownership involved and voluntary nature of the project. The project will provide appropriate compensation through the improvement in grazing lands, job creation, cash payments and other benefits listed in section 6.2 of the PD.
Evidence Used to Assess Conformance:	PD section 6.2
Date Closed:	16 September 2015

Indicator G5.8 - Demonstrate that the Project Proponent(s) has the unconditional, undisputed and unencumbered ability to claim that the project will or did generate or cause the project's climate, community and biodiversity benefits.	PD states "Rights to benefit from soil conservation as a component of wildlife conservation are conferred by the right to register lands as Conservancies by the Kenya Wildlife Conservation and Management Act of 20139. This act confers rights to benefits from conservation for a Conservancy as a "community-owned and community-run institution which aims to improve biodiversity conservation, land management

	and the livelihoods of its constituents over a defined area of land traditionally owned, or used, by that constituent community." As Conservancies, communities have the right to benefit financially from conservation activities, which would include restricted, planned and managed grazing and building soils through carbon storage."
Evidence Used to Assess Conformance:	PD section 3.2
Findings:	While the language provided in the PD demonstrates the communities rights to benefit from the carbon, language demonstrating how the project proponent has the unconditional, undisputed and unencumbered ability to claim that the project will or did generate or cause the project's climate, community and biodiversity benefits.
Non-conformance Request (NCR):	In the PD please provide evidence supporting the project proponents has the unconditional, undisputed and unencumbered ability to claim that the project will or did generate or cause the project's climate, community and biodiversity benefits.
Date Issued:	16 September 2016
Project Proponent Response/Actions and Date:	The PD now infers rights form the Kenya Community Lands Act of 2016, which confers virtual community ownership of lands currently and previously occupied by communities. This is done throughout the PD but is emphasized in section 3.2.
Findings:	The PD mentions the Kenya Community Lands Act of 2016 in 3 places in the PD (Section 2.4, and in two places of Section 3.1). While it does state that the act confers ownership, it does not reference any language in the Act or describe how the act provides NRT (the project proponent) ownership. It simply states "Grazing and grazing resource (water, soil) rights are conferred by land ownership associated with Group Ranch status via Kenya Land Act of 1968 (revised in 1970) or by Africa customary law for communities on Trust lands via the Kenya Trust Land Act of 2010. These rights are further conferred and superceded by the Kenya Community Lands Act of 2016."
Clarification Request (CL):	Please clarify how NRT is granted ownership through the Kenya Community Lands Act of 2016, demonstrating that the Project Proponent has the unconditional, undisputed and unencumbered ability to claim that the project will or did generate or cause the project's climate, community and biodiversity benefits.

Date Issued:	14 September 2018
Project Proponent Response/Actions and Date: 2/15/2019	Rights to carbon credits for the purpose of sales have been transferred from Conservancies to NRT and thence to Native Energy through signed "Carbon Consent Declarations" provided in zipped files in Supporting Documents or see https://www.dropbox.com/home/CCB%20%20Documents/Conservancy%20legal%20documents/Certificates%20of%20Incorporation
Evidence Used to Close NCR:	The audit team notes that this Indicator pertains to claim on CCB benefits. The Carbon Consent Declarations and statements in the PD clarify that this claim is allowably obtained by the proponent, NRT. The item is addressed.
Date Closed:	20 April 2019

Indicator G5.9 - Identify the tradable climate, community and biodiversity benefits of the project and specify how double counting is avoided, particularly for offsets sold on the voluntary market and generated in a country participating in a compliance mechanism.	Could not find reference addressing this indicator in the PD.
Evidence Used to Assess Conformance:	PD
Findings:	Could not find reference addressing this indicator in the PD.
Non-conformance Request (NCR):	In the PD please identify the tradable climate, community and biodiversity benefits of the project and specify how double counting is avoided, particularly for offsets sold on the voluntary market and generated in a country participating in a compliance mechanism.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is now addressed in section 3.3 of the PD.
Evidence Used to Close NCR:	Section 3.3 of version 2.1.2 of the PD states that double counting is avoided by having credits assigned on the APX VCS registry, which are not allowed in compliance carbon programs. Item closed.
Date Closed:	6 September 2018

Climate Section

CL1 Without-Project Climate Scenario

Indicator CL1.1 - Estimate the total GHG emissions inside the Project Area under the without-project land use scenario (described in G2) using an Approved or Defensible methodological approach.	Per the Rules for the Use of the CCB Standards (December 2013), a Climate Section Waiver is applicable for projects using the Third Edition.

The timeframe for this analysis is the project GHG accounting period or the project lifetime. In the without-project scenario, it is allowable for the analysis to exclude GHG emissions from sources such as biomass burning, fossil fuel combustion, synthetic fertilizers, and to exclude non-CO2 GHG emissions such as CH4 and N2O gases, in cases where this can be justified as conservative. The analysis of GHG emissions or removals must include carbon pools expected to increase significantly under the without-project scenario.	"The Climate section of the CCB Standards Third Edition is used to demonstrate a project's net positive climate benefits and not for claiming greenhouse gas (GHG) emissions reductions and removals units for use as offsets. CL1-4 is not required for projects that have met the requirements of a Recognized GHG Program. The Validation or Verification Report shall include evidence in the form of a positive validation or verification statement following the procedure of the Recognized GHG Program that the project meets the requirements of the Recognized GHG Program (for the appropriate time period, in the case of verification). If a project is not successfully validated or verified to the standards of a recognized GHG program at the time of its validation or verification to the CCB Standards, it shall demonstrate conformance with the CCB Standards Climate Section CL1-4. If a Project meets the requirements of a Recognized GHG Program resulting in a waiver of the Climate section of the CCB Standards, the project must be verified to the CCB Standards at the same time and every time that it is verified to the Recognized GHG Program."
Evidence Used to Assess Conformance:	PD and Monitoring Report, VCS Validation/Verification Report
Findings:	VCS findings closed.
Date Closed:	6 January 2020

CL2 Net Positive Climate Impacts

Indicator CL2.1 - Estimate the total GHG emissions expected from land use activities inside the project area under the with-project land use scenario using an Approved or Defensible methodological approach. This estimate must be based on clearly defined and defendable assumptions about changes in GHG emissions under the with-project scenario over the project lifetime or the project GHG accounting period. The GHG emissions estimate must include non CO2 emissions such as CH4 and N2O (in terms of CO2-equivalent). and	Per the Rules for the Use of the CCB Standards (December 2013), a Climate Section Waiver is applicable for projects using the Third Edition. "The Climate section of the CCB Standards Third Edition is used to demonstrate a project's net positive climate benefits and not for claiming greenhouse gas (GHG) emissions reductions and removals units for use as offsets. CL1-4 is not required for projects that have met the requirements of a Recognized GHG Program. The Validation or Verification Report shall include evidence in the form of a positive validation or

GHG emissions from sources such as biomass burning, fossil fuel combustion, use of synthetic fertilizers and the decomposition of Nfixing species, etc., if those GHG emissions sources are cumulatively likely to account for more than 20% of the project's expected total GHG emissions in the with-project scenario.	verification statement following the procedure of the Recognized GHG Program that the project meets the requirements of the Recognized GHG Program (for the appropriate time period, in the case of verification). If a project is not successfully validated or verified to the standards of a recognized GHG program at the time of its validation or verification to the CCB Standards, it shall demonstrate conformance with the CCB Standards Climate Section CL1-4. If a Project meets the requirements of a Recognized GHG Program resulting in a waiver of the Climate section of the CCB Standards, the project must be verified to the CCB Standards at the same time and every time that it is verified to the Recognized GHG Program."
Evidence Used to Assess Conformance:	PD and Monitoring Report, VCS Validation/Verification Report
Findings:	VCS findings closed.
Date Closed:	6 January 2020

Indicator CL2.2 - *Demonstrate* that the net climate impact of the project is positive. The net climate impact of the project is the difference between the total GHG emissions or removals in the without-project scenario (including CO2 and non-CO2 GHG emissions) and total GHG emissions or removals resulting from project activities, minus any project-related negative offsite climate impacts ('Leakage' see CL3).	Per the Rules for the Use of the CCB Standards (December 2013), a Climate Section Waiver is applicable for projects using the Third Edition. "The Climate section of the CCB Standards Third Edition is used to demonstrate a project's net positive climate benefits and not for claiming greenhouse gas (GHG) emissions reductions and removals units for use as offsets. CL1-4 is not required for projects that have met the requirements of a Recognized GHG Program. The Validation or Verification Report shall include evidence in the form of a positive validation or verification statement following the procedure of the Recognized GHG Program that the project meets the requirements of the Recognized GHG Program (for the appropriate time period, in the case of verification). If a project is not successfully validated or verified to the standards of a recognized GHG program at the time of its validation or verification to the CCB Standards, it shall demonstrate conformance with the CCB Standards Climate Section CL1-4.

	If a Project meets the requirements of a Recognized GHG Program resulting in a waiver of the Climate section of the CCB Standards, the project must be verified to the CCB Standards at the same time and every time that it is verified to the Recognized GHG Program."
Evidence Used to Assess Conformance:	PD and Monitoring Report, VCS Validation/Verification Report
Findings:	VCS findings closed.
Date Closed:	6 January 2020

CL3 Offsite Climate Impacts ("Leakage")

Indicator CL3.1 - Determine the types of Leakage that are expected and estimate offsite increases in GHG emissions due to project activities using an Approved or Defensible methodological approach. Where relevant, define and justify where Leakage is most likely to take place.	Per the Rules for the Use of the CCB Standards (December 2013), a Climate Section Waiver is applicable for projects using the Third Edition. "The Climate section of the CCB Standards Third Edition is used to demonstrate a project's net positive climate benefits and not for claiming greenhouse gas (GHG) emissions reductions and removals units for use as offsets. CL1-4 is not required for projects that have met the requirements of a Recognized GHG Program. The Validation or Verification Report shall include evidence in the form of a positive validation or verification statement following the procedure of the Recognized GHG Program that the project meets the requirements of the Recognized GHG Program (for the appropriate time period, in the case of verification). If a project is not successfully validated or verified to the standards of a recognized GHG program at the time of its validation or verification to the CCB Standards, it shall demonstrate conformance with the CCB Standards Climate Section CL1-4. If a Project meets the requirements of a Recognized GHG Program resulting in a waiver of the Climate section of the CCB Standards, the project must be verified to the CCB Standards at the same time and every time that it is verified to the Recognized GHG Program."
Evidence Used to Assess Conformance:	PD and Monitoring Report, VCS Validation/Verification Report

Findings:	VCS findings closed.
Date Closed:	6 January 2020

Indicator CL3.2 - Describe the measures taken to mitigate Leakage.	Per the Rules for the Use of the CCB Standards (December 2013), a Climate Section Waiver is applicable for projects using the Third Edition. "The Climate section of the CCB Standards Third Edition is used to demonstrate a project's net positive climate benefits and not for claiming greenhouse gas (GHG) emissions reductions and removals units for use as offsets. CL1-4 is not required for projects that have met the requirements of a Recognized GHG Program. The Validation or Verification Report shall include evidence in the form of a positive validation or verification statement following the procedure of the Recognized GHG Program that the project meets the requirements of the Recognized GHG Program (for the appropriate time period, in the case of verification). If a project is not successfully validated or verified to the standards of a recognized GHG program at the time of its validation or verification to the CCB Standards, it shall demonstrate conformance with the CCB Standards Climate Section CL1-4. If a Project meets the requirements of a Recognized GHG Program resulting in a waiver of the Climate section of the CCB Standards, the project must be verified to the CCB Standards at the same time and every time that it is verified to the Recognized GHG Program."
Evidence Used to Assess Conformance:	PD and Monitoring Report, VCS Validation/Verification Report
Findings:	VCS findings closed.
Date Closed:	6 January 2020

Indicator CL3.3 - Non-CO2 emissions must be included if they are likely to account for more than 20% of the total Leakage emissions (in terms of CO2-equivalent) following the procedures for including or excluding non-CO2 emissions described in CL 2.1.	Per the Rules for the Use of the CCB Standards (December 2013), a Climate Section Waiver is applicable for projects using the Third Edition. "The Climate section of the CCB Standards Third Edition is used to demonstrate a project's net positive climate benefits and not for claiming greenhouse gas (GHG) emissions reductions and removals units for use as offsets.

	CL1-4 is not required for projects that have met the requirements of a Recognized GHG Program. The Validation or Verification Report shall include evidence in the form of a positive validation or verification statement following the procedure of the Recognized GHG Program that the project meets the requirements of the Recognized GHG Program (for the appropriate time period, in the case of verification). If a project is not successfully validated or verified to the standards of a recognized GHG program at the time of its validation or verification to the CCB Standards, it shall demonstrate conformance with the CCB Standards Climate Section CL1-4. If a Project meets the requirements of a Recognized GHG Program resulting in a waiver of the Climate section of the CCB Standards, the project must be verified to the CCB Standards at the same time and every time that it is verified to the Recognized GHG Program."
Evidence Used to Assess Conformance:	PD and Monitoring Report, VCS Validation/Verification Report
Findings:	VCS findings closed.
Date Closed:	6 January 2020

CL4 Climate Impact Monitoring

Indicator CL4.1 - Develop and implement a plan for monitoring changes in relevant carbon pools, non-CO2 GHGs and emissions sources and leakage (as identified in CL1, CL2 and CL3) using an Approved or Defensible methodological approach and following the defined frequency of monitoring of defined parameters. Emissions sources to monitor must include any sources expected to cumulatively contribute more than 20% of total GHG emissions in the with-project scenario (See footnote to CL2.1). Where the methodological approach used to estimate leakage under CL3 requires monitoring, this leakage must be monitored.	Per the Rules for the Use of the CCB Standards (December 2013), a Climate Section Waiver is applicable for projects using the Third Edition. "The Climate section of the CCB Standards Third Edition is used to demonstrate a project's net positive climate benefits and not for claiming greenhouse gas (GHG) emissions reductions and removals units for use as offsets. CL1-4 is not required for projects that have met the requirements of a Recognized GHG Program. The Validation or Verification Report shall include evidence in the form of a positive validation or verification statement following the procedure of the Recognized GHG Program that the project meets the requirements of the Recognized GHG Program (for the appropriate time period, in the case of verification).

	If a project is not successfully validated or verified to the standards of a recognized GHG program at the time of its validation or verification to the CCB Standards, it shall demonstrate conformance with the CCB Standards Climate Section CL1-4. If a Project meets the requirements of a Recognized GHG Program resulting in a waiver of the Climate section of the CCB Standards, the project must be verified to the CCB Standards at the same time and every time that it is verified to the Recognized GHG Program."
Evidence Used to Assess Conformance:	PD and Monitoring Report, VCS Validation/Verification Report
Findings:	VCS findings closed.
Date Closed:	6 January 2020

Indicator CL4.2 - Disseminate the monitoring plan and any results of monitoring undertaken in accordance with the monitoring plan, ensuring that they are made publicly available on the internet and summaries are communicated to the Communities and Other Stakeholders through appropriate means.	Per the Rules for the Use of the CCB Standards (December 2013), a Climate Section Waiver is applicable for projects using the Third Edition. "The Climate section of the CCB Standards Third Edition is used to demonstrate a project's net positive climate benefits and not for claiming greenhouse gas (GHG) emissions reductions and removals units for use as offsets. CL1-4 is not required for projects that have met the requirements of a Recognized GHG Program. The Validation or Verification Report shall include evidence in the form of a positive validation or verification statement following the procedure of the Recognized GHG Program that the project meets the requirements of the Recognized GHG Program (for the appropriate time period, in the case of verification). If a project is not successfully validated or verified to the standards of a recognized GHG program at the time of its validation or verification to the CCB Standards, it shall demonstrate conformance with the CCB Standards Climate Section CL1-4. If a Project meets the requirements of a Recognized GHG Program resulting in a waiver of the Climate section of the CCB Standards, the project must be verified to the CCB Standards at the same time and

	every time that it is verified to the Recognized GHG Program."
Evidence Used to Assess Conformance:	PD and Monitoring Report, VCS Validation/Verification Report
Findings:	VCS findings closed.
Date Closed:	6 January 2020

GL1 Climate Change Adaptation Benefits

Indicator GL1.1 - Identify likely regional or sub-national climate change and climate variability scenarios and impacts, using available studies, and identify potential changes in the local land use scenario due to these climate change scenarios in the absence of the project.	Does not appear to be comprehensively addressed in single location in the document.
Evidence Used to Assess Conformance:	PD
Findings:	The indicator does not appear to be addressed in the PD.
Non-conformance Request (NCR):	In the PD please provide the evidence required by the indicator.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is already addressed in section 5.7 of the PD
Findings:	Section 5.7 of version 2.1.2 of the PD states that climate trends suggest a reduction in mean precipitation, with longer consecutive years with either above- or below-average precipitation. Wit and Stankiewicz and Omondi, et al, are used as references. Wit and Stankiewicz includes a map (fig. 3C) indicating Kenya's precipitation is expected to increase over the 21st century. Omondi, et al, mentions a general downward trend in precipitation in Kenya over recent history, but addresses correlations between SSTs and other factors in predicting precipitation. Neither paper is specifically about expected trends in Kenya's climate, due to GHG-induced climate change. The discussion in the PD does not include discussion of potential changes in the local land use scenario due to these climate change scenarios in the absence of the project.
Non-conformance Request (NCR):	Please address this indicator. Identify climate change/variability scenarios using appropriate

	sources, then identify local land use scenarios in the absence of the project.
Date Issued:	10 September 2018
Project Proponent Response/Actions and Date:	Climate change variability scenarios are discussed in a new first paragraph to section 5.7.
Evidence Used to Close NCR:	Climate change/variability scenarios are now more fully described and capture the intent of this Indicator. The item is addressed.
Date Closed:	20 April 2019

Indicator GL1.2 - Demonstrate that current or anticipated climate changes are having or are likely to have an impact on the well-being of Communities and/or the conservation status of biodiversity in the Project Zone and surrounding regions.	Climate: The rebuilding of soil organic carbon from the project activities of widespread PR grazing practices will likely induce dramatic improvements in the ability of people in the project area to adapt to climate change. Project activities are fully expected to restore perennial grass cover and increase soil organic carbon. The occurrence of greater soil carbon across the project area would result in the following aids in climate adaptation 1. increased infiltration and retention of limited precipitation in shallow soil layers, 2. green, higher quality forage available for more months during dry seasons/years, 3. longer periods of livestock reproduction and thus milk supply to families year-round. 4. more areas with full rest from grazing that can be used as grass banks. 5. greater retention of surface water to allow greater mobility of livestock. 6. greater allocation of livestock to cattle and away from sheep and goats.
Evidence Used to Assess Conformance:	PD cover page
Findings:	The community benefits listed in the PD include: 1. increased infiltration and retention of limited precipitation in shallow soil layers, 2. green, higher quality forage available for more months during dry seasons/years, 3. longer periods of livestock reproduction and thus milk supply to families year-round. 4. more areas with full rest from grazing that can be used as grass banks. 5. greater retention of surface water to allow greater mobility of livestock. 6. greater allocation of livestock to cattle and away from sheep and goats.

	If the project is successfully implemented it is agreed these benefits are likely to have an impact on the well-being of Communities.

Indicator GL1.3 - Describe measures needed and *taken* to assist Communities and/or biodiversity to adapt to the probable impacts of climate change based on the causal model that explains how the project activities will achieve the project's predicted adaptation benefits.	This does not appear to be specifically addressed in the PD.
Evidence Used to Assess Conformance:	PD
Findings:	This does not appear to be specifically addressed in the PD.
Non-conformance Request (NCR):	In the PD please describe the measures needed and taken to assist Communities and/or biodiversity to adapt to the probable impacts of climate change based on the causal model that explains how the project activities will achieve the project's predicted adaptation benefits.
Date Issued:	16 September 2016
Project Proponent Response/Actions and Date:	This is addressed in sections 2.2 – 2.4 of the PD
Findings:	Section 2.2 of version 2.1.2 of the PD is a description of the project activity and an implementation schedule. Section 2.3 discusses management of risks to project benefits. Section 2.4 discusses measures to maintain high conservation values. Section 5.7 of the PD states that, "The rebuilding of soil organic carbon from the project activities of widespread PR grazing practices will likely induce dramatic improvements in the ability of people in the project area to adapt to climate change." The adaptation benefit is dependent on improved soil health and building grass banks for droughts. One benefit stated is that increased water retention in soils will result in an increased number of places standing water will exist across the landscape. While the references agree that planned rotational grazing can increase soil moisture holding capacity, one of the articles specifically found that infiltration rates did not increase. None of the studies were done in an

	area with soils that have hard, cyano-bacterial crusts, as the project area does. There will be a need to draw together the probable impacts of climate change (see GL1.1) with the soil and range improvement benefits, when GL1.1 is successfully closed.
Non-conformance Request (NCR):	This indicator is partially dependent on the successful closing of GL1.1. See findings and please address this indicator in the PD.
Date Issued:	10 September 2018
Project Proponent Response/Actions and Date:	Soil water improvements that would come from planned rotational and migratory grazing are now more thoroughly referenced in section 6.2.3, especially as they relate to changes in degraded tropical savanna. References are downloaded into a references folder in supporting documents: Oduor et al 2018 and Winimariam et al 2018
Finding:	The “Climate Change References” folder contained the following documents: Kipuri & Ridgewell Report Exclusion of Pastoralist Women in the East and Horn of Africa.pdf" Lu2018_Article_AnExtremeNegativeIndianOceanDi.pdf" Ritchie Global_Env Change Serengeti 2008.pdf" Boone_et_al-2018-Global_Change_Biology.pdf" Collins et al 2013 IPCC WG1AR5_Chapter12_FINAL.pdf" Gichangi et al 2015 Climatic Change.pdf" The Oduor and Winimariam documents that are referenced could not be found. As thes are the documents supporting the increased water retention, please provide.
Clarification Request (CL):	Please provide the referenced Oduor et al 2018 and Winimariam et al 2018 documents.
Date Issued:	26 April 2019
Project Proponent Response/Actions and Date: 4/27/2019	The requested files have been uploaded to Dropbox folder “NKCP Round 3 New Files” in the NKCP dropbox site.
Finding:	The Oduor and Winimariam papers were provided. Both papers are about the use of enclosures to control grazing, which led, in both cases, to significant increases in SOC. Oduor was conducted in NW Kenya, while the Winimariam study was conducted in semiarid rangeland in Ethiopia. Item closed.
Date closed:	17 May 2019

Indicator GL1.4 - Include indicators for adaptation benefits for Communities and/or biodiversity in	This does not appear to be specifically addressed in the PD.

the monitoring plan. *Demonstrate* that the project activities assist Communities and/or biodiversity to adapt to the probable impacts of climate change. Assessment of impacts of project activities on Communities must include an evaluation of the impacts by the affected Communities.	
Evidence Used to Assess Conformance:	PD
Findings:	This indicator does not appear to be specifically addressed in the PD.
Non-conformance Request (NCR):	In the PD please include indicators for adaptation benefits for Communities and/or biodiversity in the monitoring plan. *Demonstrate* that the project activities assist Communities and/or biodiversity to adapt to the probable impacts of climate change.
Date Issued:	16 September 2016
Project Proponent Response/Actions and Date:	Insufficient time has passed for dry season grass banks to have been established throughout the project area, or for changes in water tables as a function of improved grazing to have occurred, as most Conservancies have participated in the project only since 2014. However, a key indicator of drought mitigation is the availability of milk for household use or to sell, and baseline household survey data indicate that milk is more likely to be available in communities that have implemented planned grazing for longer. This is discussed in item 3 in section 5.7 of the PD.
Findings:	Community surveys may show evidence that communities are benefiting from project activities. However, the PD does not spell out the indicators that will demonstrate adaptation benefits for communities and biodiversity. One stated benefit is an increase in water availability and rising water tables. No indicators for monitoring these benefits are described.
Non-conformance Request (NCR):	Please point out the indicators in the monitoring plan that are intended to show the project activities will provide adaptation benefits to communities and wildlife.
Date Issued:	12 September 2018
Project Proponent Response/Actions and Date:	Measures of soil water content have been added to measures of soil carbon as indicators of health in section 8.3.1. Soil water content can be calibrated to recent rainfall using satellite data. These two

	variables are superior to vegetation data because they more closely indicate the potential productivity at a site. Social variables relative to milk availability and distance to travel to water, which should increase and decrease respectively are already monitored see Fig. 31 in MR
Evidence Used to Close NCR:	The measure of gravimetric soil water content and procedures has been added. Milk availability and distance to water seem an appropriate metric as well to monitor that project activities will provide adaptation benefits to communities. Items addressed.
Date Closed:	26 April 2019

Community Section

CM1 Without-Project Community Scenario

Indicator CM1.1 - Describe the Communities at the start of the project and significant community changes in the past, including well-being information, and any community characteristics. Describe the social, economic and cultural diversity within the Communities and the differences and interactions between the Community Groups.	The PD provides a general discussion of the communities, providing ethnic background, general geographic distribution, population statistics by conservancy, and a general discussion of the challenges faced by communities in the region, stating that "all share a similar socio-economic dynamic and traditional pattern of land use, pastoralism, for at least the last 5,000 years."
Evidence Used to Assess Conformance:	PD section 1.3
Findings:	The PD provides a general description of the communities involved and the challenges faced, but does not provide individual community specific information regarding the social, economic and cultural diversity within the Communities and the differences and interactions between the Community Groups.
Non-conformance Request (NCR):	In the PD please add language sufficient to address all elements of the indicator.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is now addressed in the last paragraph of section 1.3.2 of the PD and in information already provided in Table 1 of the PD.
Findings:	Table 1 of version 2.1.2 of the PD includes the dominant ethnic groups of each conservancy. The PD states the northern rangelands are the most under-developed region of Kenya, with one of the highest indexes of poverty, worldwide, and significantly lower than other regions of Kenya.

	Income is almost completely derived from livestock. Ethnicities include Ariaal, Boran, Gabbra, Maasai, Pokot, Rendile, Samburu and Turkana. They have been pastoralists for millennia. Pastoralist mobility has been reduced in recent times for a variety of reasons, resulting in overgrazing. Since 2000, the NRT has worked with communities to create conservancies and regulate grazing. Concepts of core and buffer areas were used. Section1.3.3 states that livestock raids are a rite of passage for young men, and is a significant factor constraining economic development. Drought further escalates conflict when herders move livestock greater distance from home conservancies, bringing historically antagonistic groups into close proximity.
Clarification request (CL):	As the indicator requires that the project describe the differences and interactions between the Community Groups, please provide more detail regarding the interactions between ethnic groups. Which groups have historical animosities that carry through to their inter-group relationships today?
Date Issued:	12 September 2018
Project Proponent Response/Actions and Date: 3/1/2019	This is addressed in section 1.3.3 of the PD
Findings:	While section 1.3.3 “Conflicts and Disputes” includes some additional detail about why the cattle raids occur it does not contain the detail requested regarding the interactions between ethnic groups and which groups have historical animosities that carry through to their inter-group relationships today.
Clarification request (CL):	Please provide greater detail regarding the interactions between ethnic groups and which groups have historical animosities that carry through to their inter-group relationships today.
Date Issued:	26 April 2019
Project Proponent Response/Actions and Date: 4/27/2019	Section 1.3.3 in the PD and MR now feature three paragraphs on historical content and current hotspots of conflict that should provide sufficient detail. These details are linked to the fact that conflict resolution can be efficiently focused toward different laces at different times, due to the geography and timing of livestock movements.
Findings	Section 1.3.3 of version 2.1.4 of the PD and the same section of version 2.3 of the monitoring report include an explanation of the ethnic groups with a long history of conflicts. There is some conflict

	between the Samburu and Turkana, Maasai and Burana, explained more fully in these sections. Item closed.
Date closed:	17 May 2019

Indicator CM1.2 - Evaluate whether the Project Zone includes any of the following High Conservation Values (HCVs) related to community well-being and describe the qualifying attributes for any identified HCVs: a. Areas that provide critical ecosystem services; b. Areas that are fundamental for the livelihoods of Communities; and c. Areas that are critical for the traditional cultural identity of Communities. Identify the areas that need to be managed to maintain or enhance the identified HCVs.	The PD does not indicate if any community HCVs are present in the project areas.
Evidence Used to Assess Conformance:	PD section 1.3
Findings:	The PD does not indicate if any community HCVs are present in the project areas.
Non-conformance Request (NCR):	In the PD please specifically state if community HCVs are present. If so please justify which category of HCV they qualify as.
Date Issued:	16 September 2016
Project Proponent Response/Actions and Date:	This is addressed in a new section 1.3.5 of the PD
Findings:	The PD does not describe any particular areas that provide community-related HCVs. The bulk of the project area, itself, provides critical ecosystem services for raising livestock, which is critical for cultural identity of the indigenous pastoral groups. The project seeks to maintain their ability to graze livestock. In short, the project area includes all three HCVs, though they are not localized.
Clarification request (CL):	Aside from the fact that the entire area provides the grazing and water resources needed to maintain life

	and the pastoral existence, please explain whether there are any particular features of the landscape or specific sites that are critical for: The cultural identity of any of the groups of the area (e.g., sites of religious or cultural significance). Critical ecosystem services, like water sources.
Date Issued:	12 September 2018
Project Proponent Response/Actions and Date: 3/3/2019	A discussion of sacred sites is provided in section 6.4 3) of the PD. A discussion of ecosystem services is provided under biodiversity benefits but I added to 6.4 4) community benefits as well
Evidence Used to Close CL:	The PD now sufficiently addresses the inclusion of HCV's for biodiversity and community. Item addressed.
Date Closed:	26 April 2019

Indicator CM1.3 - Describe the expected changes in the well-being conditions and other characteristics of communities under the without-project land use scenario, including the impact of likely changes on all ecosystem services in the Project Zone identified as important to Communities.	The PD provides a general description of the conditions and characteristics of the communities under the baseline scenario, including the loss of soil fertility, water loss, vulnerability to drought, human conflict due to drought.
Evidence Used to Assess Conformance:	PD section 1.1 and 1.3.1
Findings:	The without case scenario for communities appears to be presented in small discussions throughout the document, but not in a single concise section documenting the expected changes in the well-being conditions and other characteristics of Communities under the without-project land use scenario, including the impact of likely changes on all ecosystem services in the Project Zone identified as important to Communities.
Non-conformance Request (NCR):	In the PD please provide a concise discussion of the without project scenario for the communities, specifically addressing the elements in the indicator.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is presented now in a new section 1.3.6. of the PD
Evidence Used to Close NCR:	Section 1.3.6 of version 2.1.2 of the PD, continuous overgrazing will cause a loss of SOC and forage productive capacity, which in turn will cause further impoverishment of the communities. Herders will range further from home encroach on private and publicly held lands, perhaps leading to conflict.

	Eventually, the government may designate the lands for other purposes, creating additional pressures on the traditional pastoralist livelihood. Item closed.
Date Closed:	12 September 2018

CM2 Net Positive Community Impacts

Indicator CM2.1 - Use appropriate methodologies to assess the impacts, including predicted and actual, direct and indirect benefits, costs and risks, on each of the identified Community Groups (identified in G1.5) resulting from project activities under the with-project scenario. The assessment of impacts must include changes in well-being due to project activities and an evaluation of the impacts by the affected Community Groups. This assessment must be based on clearly defined and defendable assumptions about changes in well-being of the Community Groups under the with-project scenario, including potential impacts of changes in all ecosystem services identified as important for the Communities (including water and soil resources), over the project lifetime.	In section 6.2 the PD provides a detailed list of the likely community benefits. Further surveys of the communities involved have been undertaken to determine what the greatest needs are and these appear to be consistent with the proposed benefits provided.
Evidence Used to Assess Conformance:	PD section 6.2
Findings:	While the PD does list the benefits to be provided to the community from the project, it is not clear what methodologies have been used to assess the impacts as outlined by the indicator, including predicted and actual, direct and indirect benefits, costs and risks, on each of the identified Community Groups resulting from project activities under the with-project scenario.
Non-conformance Request (NCR):	In the PD please provide greater detail to specify the methodology that has been used to assess the indicators required, including the benefits on each of the identified community groups.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	The benefits, risks etc. are the same for all the community groups. Thus any discussion of these for

	individual groups is redundant, and that present in section 6 applies to all. This point is now made at the beginning of section 6.1
Findings:	Section 6.1.4 of version 2.1.2 of the PD states that community data will be collected through NRT Social CoMMs surveys and focus groups. Social CoMMs is described as an outgrowth of training of community members by social scientist Dr. Jessica Musengezi of TNC. This section appears to have been written to show how community member input into project management is conducted, to include all community sub groups. However, the Social CoMMs survey is also the method for measuring potential impacts of project activities. Survey and focus group questions are provided in section 8.3.3.2 of the PD. These questions appear quite capable of tracking changes in community well-being, as well as attitudes toward the project and grazing plan, through time. Item closed.
Date Closed:	12 September 2018

Indicator CM2.2 - Describe measures needed and *taken* to mitigate any negative well-being impacts on Community Groups and for maintenance or enhancement of the high conservation value attributes (identified in CM1.2) consistent with the precautionary principle.	No specific categories of HCVs have been identified for community.
Evidence Used to Assess Conformance:	PD
Findings:	No specific categories of HCVs have been identified for community.
Non-conformance Request (NCR):	In the PD please specify any specific categories of community HCVs.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	Community HCVs are now specified in new section 1.3.5 of the PD
Findings:	Section 1.3.5 explains the community-related HCVs of the project area. All three are present. These HCVs are not localized (see CM1.2). It is difficult for the auditors to envision a negative impact on the well-being of communities from project activities, as the activities are being done to preserve the HCVs while still using them at a similar level as

	in the baseline. However, this indicator was not addressed.
Non-conformance Request (NCR):	Please address whether any negative well-being impacts on community groups were identified as a result of project activities, and include mitigation measures needed and taken to address them.
Date Issued:	12 September 2018
Project Proponent Response/Actions and Date: 2/2/26/2019	A new section 6.2.5 page 94 addresses this.
Evidence used to close NCR:	There is no section 6.2.5 but section 6.2.4 addresses negative community impacts. The negative impacts described seem an appropriate characterization of the circumstances and the mitigation measures proposed seem the most realistic response. Item addressed.
Date Closed:	26 April 2019

Indicator CM2.3 - *Demonstrate* that the net well-being impacts of the project are positive for all identified Community Groups compared with their anticipated well-being conditions under the without-project land use scenario (described in CM1).	Though the well-being conditions of the without project case are not highly detailed, the benefits of the with project scenario, coupled with evidence from the site visit, clearly support that impacts are positive.
Evidence Used to Assess Conformance:	PD section 1.3, 1.4 and 6.2
Findings:	Though the well-being conditions of the without project case are not highly detailed, the benefits of the with project scenario, coupled with evidence from the site visit, clearly support that impacts are positive.

Indicator CM2.4 - *Demonstrate* that no High Conservation Values (identified in CM1.4) are negatively affected by the project.	The PD does not detail any specific HCV categories for community.
Evidence Used to Assess Conformance:	Insert Evidence Used
Findings:	The PD does not detail any specific HCV categories for community.
Non-conformance Request (NCR):	Pending completion of indicator CM1.2
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	The HCV categories are presented in new section 1.3.5 of the PD
Evidence Used to Close NCR:	Version 2.1.2 of the PD indicates that the project area includes all three community-related HCVs: a. Areas that provide critical ecosystem services;

	b. Areas that are fundamental for the livelihoods of Communities; and c. Areas that are critical for the traditional cultural identity of Communities. Given that these communities lead a pastoralist lifestyle, the entire project area available to grazing provide all three HCV types. The lifestyle, itself, requires a large expanse of land available for grazing. The project activities – rotational grazing and the sub-activities that support it – are designed to improve the quality of the soil and forage available to the communities. Item addressed.
Date Closed:	26 April 2019

CM3 Other Stakeholder Impacts

Indicator CM3.1 - Identify any potential positive and negative impacts that the project activities are likely to cause on the well-being of Other Stakeholders.	In section 6.2 the PD describes the community evaluation and the likely community benefits. Section 6.3 lists the potential negative offsite stakeholder impacts.
Evidence Used to Assess Conformance:	PD section 6.2 and 6.3
Findings:	The PD sufficiently details the positive and negative impacts to offsite stakeholders.

Indicator CM3.2 - Describe the measures needed *and taken* to mitigate the negative well-being impacts on Other Stakeholders.	n section 6 the PD describes the community evaluation and the likely community benefits. Section 6.3 lists the potential negative offsite stakeholder impacts and actions implemented to address these negative impacts.
Evidence Used to Assess Conformance:	PD section 6.2 and 6.3
Findings:	Prior to and again during the site visit there were tribal attacks due to water, cattle and other resources from stakeholders outside the project. If these measures (negotiated agreements) intended to mitigate negative offsite impacts, how do these recent attacks not represent a failure of those measures?
Non-conformance Request (NCR):	In the PD please address how the effectiveness of the measures intended to mitigate negative offsite impacts is assessed, and how something like tribal attacks due to resources impacts and requires adaptation of these measures.

Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is addressed in an amplified discussion in section 6.3 of the PD. To expect a project involving this many different ethnic groups, some of which are traditional enemies and have cultural practices (stealing cattle) that have been slow to disappear, is unrealistic and counter to the whole point of doing carbon projects, which is to create conditions that eventually de-motivate conflicts.
Findings:	Section 6.3 of version 2.1.2 of the PD states that the activities that are hoped to mitigate tribal conflicts include a greater emphasis on agreements between communities both on and off the project area, and the eventual building up of grass banks. Acceptance of off-project livestock is expected to be easier when grass banks are established. Conflicts over grazing and encroachment are expected to continue, because it will take 10 years or more for range conditions to improve significantly. No discussion of how the effectiveness of peace meetings, agreements and the development of grass banks was included.
Non-conformance Request (NCR):	See the original NCR. How are measures intended to mitigate off-site stakeholder impacts assessed?
Date Issued:	12 September 2018
Project Proponent Response/Actions and Date: 3/2/2019	See (see Mid-Year Report on Implementation of NRT Operational Plan 2018) and NRT State of the Conservancies Report 2017 pp. 42-44
Findings:	The reports referenced provide detail on the status and impact of the measures taken, but the discussion of the effectiveness of peace meetings, agreements and the development of grass banks needs to be included in the PD and monitoring report.
Non-conformance Request (NCR):	Please provide the discussion of the effectiveness of peace meetings, agreements and the development of grass banks within the PD and updated in the MR at each verification event.
Date Issued:	26 April 2019
Project Proponent Response/Actions and Date: 4/27/2019	As discussed earlier, documentation is poor, but there is a discussion of the effectiveness of peace meetings in the final paragraph of section 1.3.3 in the PD and MR. Details on how the situations were resolved, which parties were involved and instances where extended peace resulted and other conditions where repeated conflict resolution was required. This is probably the best information we have.

Findings:	Sections 1.3.3 of the PD (v2.1.4) and monitoring report (v2.3) describe some of these meetings – especially recent meetings during 2018. Conservancy manager reports are said to include reference to these meetings. Item closed.
	17 May 2019

Indicator CM3.3 - Demonstrate that the project activities do not result in net negative impacts on the well-being of Other Stakeholders.	A demonstration that the project activities do not result in net negative impacts on the well-being of Other Stakeholders could not be found in the PD.
Evidence Used to Assess Conformance:	PD
Findings:	A demonstration that the project activities do not result in net negative impacts on the well-being of Other Stakeholders could not be found in the PD.
Non-conformance Request (NCR):	In the PD please add specific language to address the requirements of this indicator, providing a comparative analysis showing the result as net positive.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This has been addressed in section 6.3 of the PD.
Evidence Used to Close NCR:	Section 6.3 of version 2.1.2 of the PD describes the negative impacts on offsite stakeholders as: The enforcement of project boundaries and perception that traditional use of other communities' grazing lands during droughts is no longer permitted. Potential for escalating conflicts over grass and water. These are balanced by: Less encroachment by livestock from the project area onto offsite stakeholder lands. Less encroachment into wildlife areas. Potential for some conserved grazing land to be shared with offsite stakeholders. Proof of concept to eventually support sustainable grazing on offsite stakeholder lands. Over time, it is possible the balance of impacts to offsite stakeholders will be positive. Item addressed.
Date Closed:	26 April 2019

CM4 Community Impact Monitoring

Indicator CM4.1 - Develop and implement a monitoring plan that identifies community variables to be monitored, Communities, Community	In section 8.3.3 of the PD a monitoring plan is described which lists a high level structure for focus groups and household surveys. Sample

Groups and Other Stakeholders to be monitored, the types of measurements, the sampling methods, and the frequency of monitoring and reporting. Monitoring variables must be directly linked to the project's objectives for Communities and Community Groups and to predicted outputs, outcomes and impacts identified in the project's causal model related to the well-being of Communities (described in G1.8). Monitoring must assess differentiated impacts, including and benefits, costs and risks, for each of the Community Groups and must include an evaluation by the affected Community Groups.	questionnaires for both the household surveys and focus groups are provided.
Evidence Used to Assess Conformance:	PD section 8.3.3
Findings:	The information in the PD for monitoring appears to be sufficient to describe the baseline surveys. There is a discussion about future social data gathering however it states it is for baseline sampling in Samburu communities in Namunyak and Borana communities in Biliqo Bulesa. It is not clear if ongoing monitoring for social assessment will take place over the life of the project, and no frequency or timeline of activities is provided. Further it is not clear where in the PD monitoring variables are shown to be directly linked to the project's objectives for Communities and Community Groups and to predicted outputs, outcomes and impacts identified in the project's causal model related to the well-being of Communities. The causal model is not discussed. Mention of assessment of differentiated impacts could not be found.
Non-conformance Request (NCR):	Within the PD please address all the findings, ensuring that all elements of the indicator are clearly addressed in a single location in the PD.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	The causal model showing how project objectives are linked to measured social variables and then linked to community well-being is in section 1.3.5 of the PD
Evidence Used to Close NCR:	Figure 3 in section 1.3.5 of version 2.1.2 of the PD depicts a causal model, linking the project activity to

	ecological changes, which are linked to community consequences, which are monitored through some of the variables in the survey, and then to HCVs. Table 4 in section 2.2 is an implementation schedule, which includes baseline monitoring as well as Social CoMMs monitoring in 2016, community monitoring in 2018, 2020, 2023 and 2026. Item closed.
Date Closed:	12 September 2018

Indicator CM4.2 - Develop and implement a monitoring plan to assess the effectiveness of measures taken to maintain or enhance all identified High Conservation Values related to community well-being.	High conservation values for community were not identified by the project proponent.
Evidence Used to Assess Conformance:	PD
Findings:	The PD does not detail any specific HCV categories for community.
Non-conformance Request (NCR):	Pending completion of indicator CM1.2
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	Monitoring Plan under development. When completed it will be posted for public comment at Conservancy HQs. Feedback will be gathered by the same cell phone text surveys as we used to announce the project
Evidence Used to Close NCR:	The monitoring plan, described in version 2.1.2 of the PD, does not directly address this indicator. Community-related HCVs include all three categories (areas that provide critical ecosystem services, areas that are fundamental for the livelihoods of communities, areas that are critical for the traditional cultural identity of communities). The entire project area, available for grazing, is the HCV. The monitoring plan, provided in the PD, assesses soil health to some extent, and the forage productivity of the project area. In addition, it monitors the well-being of community members in ways that can be tied back to the health of the range. Item closed.
Date Closed:	12 September 2018

Indicator CM4.3 - Disseminate the monitoring plan, and any results of monitoring undertaken in accordance	No discussion of how the monitoring plan was or shall be disseminated could be found within the PD.

with the monitoring plan, ensuring that they are made publicly available on the internet and summaries are communicated to the Communities and Other Stakeholders through appropriate means.	
Evidence Used to Assess Conformance:	PD
Findings:	No discussion of how the monitoring plan was or shall be disseminated could be found within the PD.
Non-conformance Request (NCR):	Within the PD please include language regarding how and when the monitoring plan will be/was disseminated.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	Plans to disseminate monitoring plan – NRT website, posting at Conservancy HQ
Findings:	This indicator is still not discussed in the PD or monitoring report, as of versions 2.1.2 of these documents. Photos were provided (see indicator G3.1), showing what appear to be monitoring reports, posted at most of the headquarters of the conservancies.
Non-conformance Request (NCR):	Please address this indicator within the PD and monitoring report.
Date Issued:	13 September 2018
Project Proponent Response/Actions and Date: 3/2/2019	This is entered in a new section 8.1.6 Dissemination of Monitoring Plan. The monitoring plan is disseminated in a series of separate actions. 80% of monitoring is performed by communities and is subdivided into wildlife, vegetation, and social, with each having a separate community-based management system (CoMMs). Livestock monitoring is performed by grazing coordinators who are members of the communities they monitor, and their activities are communicated to the public in grazing committee meetings within Conservancies. Larger and broader monitoring plans and results have been presented in annual (or so) workshops, such as the September 2017 workshop (see supporting documents in Dropbox).
Findings:	Section 8.1.6 of the PD now details the two primary approaches to disseminating the monitoring plan and results. Item addressed.
Date Closed:	26 April 2019

GL2 Exceptional Community Benefits

Indicator GL2.1 - a. Demonstrate that Smallholders/Community Members or Communities either own or have management rights, statutory or customary, individually or collectively, to land in the Project Area. The Smallholders/Community Members or Communities have rights to claim that their activities will or did generate or cause the project's climate, community and biodiversity benefits. OR b. Demonstrate that the Project Zone is in a low human development country OR in an administrative area of a medium or high human development country in which at least 50% of the households within the Communities are below the national poverty line.	Section 1.3.2 of the PD provides a general description of the land tenure and resource rights in the project areas.
Evidence Used to Assess Conformance:	PD section 1.3.2
Findings:	The PD describes the general ownership types within the communities in the project area, however no documentation such as registration as Group Ranches under the Kenya Land (Group Representatives) Act of 1968 or Trust MOI, has been provided to support the ownership assertion.
Non-conformance Request (NCR):	Please provide documentation such as registration as Group Ranches under the Kenya Land (Group Representatives) Act of 1968 or individual Trust MOIs. Please provide a list of all the communities in the project area along with a list of the type of documentation provided to support the ownership assertion.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	Community applications for Conservancy status under the Wildlife Act of 2013 and the Community Lands Act of 2016 for each Conservancy are available (submitted by ftp or email).
Clarification Request (CL):	Pending receipt of described documents.
Date Issued:	14 September 2018
Project Proponent Response/Actions and Date: 2/16/2019	Community applications for Conservancy status the Community Lands Act of 2016 and Certificates of Incorporation and Tax authorization under the Wildlife Act of 2013 are available for each Conservancy in Supporting Documents.

Clarification Request (CL):	The documents provided included the certificates of incorporation and tax authorization, but the community applications for conservancy status under the Wildlife Act and the Community Lands Act could not be located. Please provide these.
Date Issued:	26 April 2019
Project Proponent Response/Actions and Date:	Formal applications don't exist as the legislation doesn't yet allow for conservancies to be registered. Until the legislation is ready then conservancies cannot apply for registration. What we can provide is (1) “draft” applications in the form of the Conservancy management plans, and (2) evidence of membership of Conservancies in the Kenya Wildlife Conservancies Association (KWCA) the national umbrella body for conservancies in Kenya. This membership, coupled with their certification as legal entities, puts each of the 14 participating Conservancies on equal footing with other Conservancies that own carbon credits from other land use projects, including the Chyulu Hills and Kasigau Corridor REDD+ projects. In the absence of the legislation, is the most appropriate form of showing these Conservancies are recognised nationally as legal entities.
Findings:	A letter from the Kenya Wildlife Conservancy Association, addressed to Verra, states that the 14 conservancies belong to the KWCA, the umbrella body for community and private conservancies. Item closed.
Date closed:	17 May 2019

Indicator GL2.2 - *Demonstrate* that the project generates short-term and long-term net positive well-being benefits for Smallholders/ Community Members. Include indicators of well-being impacts on Smallholder/Community Members in the monitoring plan. The assessment of impacts must include changes in well-being due to project activities and an evaluation of the impacts by the affected smallholders/Community Members.	The monitoring plan in both the PD and PIR is focused on the baseline surveys and not assessment of the status of the project after initial implementation.
Evidence Used to Assess Conformance:	PD section 8.3.3, PIR section 8.3.3
Findings:	The monitoring plan is focused on the baseline survey and does not include elements to demonstrate if the project has generated short-term

	and long-term net positive well-being benefits for Smallholders/ Community Members. While it does include some indicators of well-being impacts on Smallholder/Community Members, the assessment of impacts does not include changes in well-being specifically due to project activities. As the questions were generated for baseline assessment they do not include specific questions tying benefits to project activities, rather just through inference. It also does not include an evaluation of the impacts of the project activities by the affected smallholders/Community Members.
Non-conformance Request (NCR):	Please add language to the monitoring plan sufficient to address all elements of the indicator, as further described by the finding. Please add a monitoring plan that will be implemented after the baseline assessment is completed. Please include the findings from this monitoring plan in the PIR so that project performance after implementation can be assessed.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	Monitoring Plan under development. PIR to include separate baseline and project scenario indicators
Evidence Used to Close NCR:	Section 6.2 of the PD describes the community impacts as net positive. These impacts include the distribution of revenues to communities and the restoration of grazing lands in the project area. The PD goes on to describe the benefits that *could* potentially be received by the communities. However, these benefits depend on how the communities decide to spend whatever funds they eventually receive, rather than any project activity or requirement. In addition, social capital is said to be enhanced by the need for different peoples to cooperate and coordinate grazing plans, the ability to assess grazing conditions. The short-term positive impact can be considered the distribution of funds from carbon sales. The improvement of the range can be considered a more median to long-term impact. Negative project area stakeholder impacts are extremely low. Survey questions that are used in community impact surveys cover monitoring the well-being of

	community members, most of which are directly related to the condition of the range for grazing. Item closed.
Date Closed:	13 September 2018

Indicator GL2.3 - Identify, through a participatory process, risks for the Smallholders/Community Members to participate in the project, including those related to tradeoffs with food security, land loss, loss of yields and short-term and long-term climate change adaptation. Explain how the project is designed to avoid such tradeoffs and the measures taken to manage the identified risks. Include indicators of risks for Smallholders/Community Members in the monitoring plan.	Though risks/negative offsite impacts have been considered in section 6.3 of the PD, it does not appear the risks for onsite community participation have been included. Risks for community members could not be found in the monitoring plan.
Evidence Used to Assess Conformance:	PD section 6.3
Findings:	Risks for community members participation in the project need to be included in the PD. Questions for assessment of these risks need to be included in the monitoring plan (non-baseline post-implementation plan).
Non-conformance Request (NCR):	In the PD please list the risks to the community members who are on-site and are participating the project. Please add language to the monitoring plan sufficient to address all elements of the indicator, as further described by the finding.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	Risk to project community members is be included in monitoring plan
Findings:	Section 6.1.4 of version 2.1.2 of the PD discusses how risks are determined and provides an example of how the results of surveys and group discussions are used where the risk of encroachment onto the conservancies by outside groups was the number one concern of community members. The project directed efforts toward resolving disputes due to encroachment and the NRT developed the ability to rapidly respond to conflicts between herders of different ethnic groups. This indicator was not formally addressed in the PD. No list of risks to community members was provided, only the above-mentioned example.

Non-conformance Request (NCR):	Please formally address this indicator in the PD, describing risks to community participants, real or imagined, and discuss how the project mitigates for these risks.
Date Issued:	13 September 2018
Project Proponent Response/Actions and Date: 3/1/2019	Risks to community participants are communicated upon hiring as part of standard operating procedures. For example, see the procedures for game scouts[8] who also monitor borders and engage with encroaching off-project herders. Procedures address risks and mitigation previously discussed in section 2.3.
Evidence used to close NCR:	The detail in section 2.3 of the PD details the largest short and long term risks anticipated and details the mitigation strategy. Item addressed.
Date Closed:	26 April 2019

Indicator GL2.4 - Identify Community Groups that are marginalized and/or vulnerable. *Demonstrate* that the project generates net positive impacts on the well-being of all identified marginalized and/or vulnerable Community Groups. *Demonstrate* that any barriers or risks that might prevent benefits going to marginalized and/or vulnerable Smallholder/Community Members have been identified and addressed. *Demonstrate* that measures are taken to identify any marginalized and/or vulnerable Smallholders/Community Members, whose well-being may be negatively affected by the project, and that measures are taken to avoid, or when unavoidable to mitigate, any such impacts.	Identification of marginalized or vulnerable groups could not be located. A demonstration that the project generates net positive impacts on the well-being of all identified marginalized and/or vulnerable Community Groups could not be located. A demonstration that barriers and risks that could prevent benefits from going to these marginalized/vulnerable community members have been identified and addressed could not be located.
Evidence Used to Assess Conformance:	PD section 6.4
Findings:	It is not clear where marginalized/vulnerable groups have been identified. In section 6.4 women and the poorest 25% are listed as “key social groups”. Please identify if these are the

8 https://static1.squarespace.com/static/5af1629f12b13f5ce97ca0b5/t/5b6330d9575d1f66316bf5f0/1533227321252/Wildlife-CoMMS+guide_complete_low_res.pdf

	marginalized/vulnerable groups. If so, please address all aspects of the indicator for these groups in the PD.
Non-conformance Request (NCR):	In the PD please state which groups are marginalized/vulnerable and how they were identified. Please address all aspects of the indicator for these groups in the PD.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	The change in wording has been made throughout the PD and is addressed specifically in section 6.4. Section 6 already addresses the Indicator.
Findings:	Sections 2.6, 6.1.4 and 6.4 mention women and the poorest 25% of community members as marginalized and vulnerable groups. No method was given on how marginalized and vulnerable groups were identified **nor how the project *Demonstrates* that measures are taken to avoid, or when unavoidable to mitigate, any such impacts to marginalized and vulnerable groups**. Potential barriers to marginalized and vulnerable groups enjoying project benefits were not identified. Benefits to marginalized and vulnerable groups are essentially the benefits that anyone would receive, according to the PD. More local forage would be available for small herds of goats that are used for feeding families. The PD then points out that 18% of community members, presumably included in the poorest 25%, own no livestock at all, but how they benefit from improved forage is not mentioned. Many benefits to the poor that are mentioned in the PD depend on the decisions made on how funds are to be used, which are apparently not dictated by the project.
Non-conformance Request (NCR):	Please identify potential barriers that might prevent benefits from reaching marginalized and vulnerable community members and address them in the PD. Please detail how the project *Demonstrates* that measures are taken to avoid, or when unavoidable to mitigate, any such impacts to marginalized and vulnerable groups. Most benefits derived from the project, for marginalized and vulnerable people, apparently depend on the way community funds are spent, since most of the poorest 25% own no livestock at

	all. Does the project have any way to ensure benefits are received by all?
Date Issued:	13 September 2018
Project Proponent Response/Actions and Date: 2/21/2019	This is addressed extensively in section 6.2.1, 6.2.2, and 6.2.3. The single largest category of distribution of community revenues is to education through bursaries. The purpose of bursaries is to provide benefits to marginalized households who cannot afford to send children to school.
Evidence used to close NCR:	Agreed that this is addressed within section 6.2.1-6.2.3. Item addressed.
Date Closed:	26 April 2019

Indicator GL2.5 - Demonstrate that the project generates net positive impacts on the well-being of women and that women participate in or influence decision-making and include indicators of impacts on women in the monitoring plan.	Section 6.4 of the PD states that "Two key social groups, women and the poorest 25%, should benefit from this drastic reduction in grazing pressure. Women, together with their male children aged 8-12, typically are responsible for husbanding small livestock, mainly sheep and goats, to provide milk and meat for families. Women should benefit from longer-lasting green forage because it would drive more sustainable milk production, less time required for herding animals long distances from the family boma to find suitable forage, more time for their children to attend school, and more time and resources (from selling milk) to engage in alternative livelihoods, such as making crafts to sell through wildlife-based tourism, sewing, etc."
Evidence Used to Assess Conformance:	PD section 6.4
Findings:	The PD demonstrates that the project generates net positive impacts on the well-being of women. It is not clear where the PD indicates that women participate in or influence decision-making. Additionally, it is not clear where the indicators of impacts on women are included in the monitoring plan.
Non-conformance Request (NCR):	Please add language to the PD sufficient to address all elements of the indicator, which are further outlined in the finding.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	Language for women as decision makers is in section 6.1.2 of the PD
Findings:	Section 6.1.2 of version 2.1.2 of the PD states, "Cultural division of labor places grazing issues in the purview of men, so including women and households without livestock in the decision process can be challenging. However, focus groups that included women and morani revealed that women

	influence decisions about livestock sales and the distance and timing of livestock movements within their household, and thus receive information in an additional within-household communication channel beyond step 4. Women heads of household, many of which have significant livestock herds, are also contacted by village elders, Conservancy grazing committee members, NRT grazing coordinators, and NRT Social CoMMs supervisors." Surveys used in community monitoring are provided, including those to all-women focus groups. Surveys, some of which are filled out by female heads of household, include questions that identify the sex of the people in the household, and the division of labor for income-producing activities. It also asks general opinions about the project and the distribution of benefits. However, it is not clear what specific indicators of impacts on women are being utilized nor where they are located within the PD and Monitoring Report. Please provide.
Clarification Request (CL):	Please provide a list of the specific indicators of impacts on women being utilized, the basis for their selection, and where they are located within the PD and Monitoring Report.
Date Issued:	13 September 2018
Project Proponent Response/Actions and Date:	Need to add
Clarification Request (CL):	No response provided. Please see and address original finding.
Date Issued:	26 April 2019
Project Proponent Response/Actions and Date:	Indicators for project impacts on women are listed and justified in section 8.1.5 of both the PD and MR.
Findings:	There is no section 8.1.5 in v2.1.4 of the PD, but section 7.1.5 of the PD appears to be the intended section, as it is identical to section 8.1.5 of the monitoring report. The documents explain that a list of questions (included within the above-mentioned sections) are asked of both heads of household and head women of household, to ensure that both sexes are sampled. Special questions for women only are not asked. Given the nature of the questions, they should be able to be used to monitor impacts on women, especially in contrast with men. Item closed

Date closed:	24 May 2019

Indicator GL2.6 - Describe the design and implementation of a benefit sharing mechanism, demonstrating that Smallholders/Community Members have fully and effectively participated in defining the decision-making process and the distribution mechanism for benefit sharing; and demonstrating transparency, including on project funding and costs as well as on benefit distribution.	It is not clear where elements addressing this indicator are located in the PD.
Evidence Used to Assess Conformance:	PD
Findings:	It is not clear where elements addressing this indicator are located in the PD.
Non-conformance Request (NCR):	Please add language to the PD sufficient to address all elements of the indicator.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	The revenue distribution plan is presented at the beginning of section 6.2
Findings:	Section 6.2 of version 2.1.2 of the PD says that project revenues are distributed to the communities through the NRT Pooled Conservancy Fund, and spending decisions are made by first holding community meetings (open to all) to determine what should be done. Communities then write proposals to the fund for their prioritized projects. NRT then awards funds based on conservancy, past performance with NRT funding. Further, some credit sales require that funds go toward specific community activities. Figure 20 depicts a graph, showing the amounts spent from the Pooled Conservancy fund, for various spending categories. About 41% of the funds go toward the category of education, though the caption erroneously claims the majority of funding goes toward educational efforts. It is not clear whether this graph depicts past expenditures or whether the relative ratio of expenditures is dictated by NRT guidelines or agreements.
Clarification Request (CL):	See findings. Please clarify what the amounts reported in figure 20 represent, and whether future

	expenditures are required to follow the same or a similar pattern. Correct the error in the caption.
Date Issued:	13 September 2018
Project Proponent Response/Actions and Date: 2/16/2019	Section 6.2. (pp. 88,89) of the PD has been extensively revised to clarify revenue distribution, make clearer the system of checks and balances to avoid financial mismanagement, and to clarify how communities allocate revenues, including to women and poor community members.
Evidence used to close CL:	Section 6.2 now sufficiently details distribution. Issue addressed.
Date Closed:	26 April 2019

Indicator GL2.7 - Explain how relevant and adequate information about predicted and actual benefits, costs and risks has been communicated to Smallholders/Community Members and provide evidence that the information is understood.	In section 6.1 the PD states "The carbon project, whereby yet another benefit of planned rotational grazing is presented, has been communicated much more recently due to high uncertainty in the carbon market and a reluctance to raise hopes about potential revenues. However, the Conservancies began on 15 May 2015 a solicitation of participation and public comment period, with announcement and information about the project distributed by NRT grazing coordinators and other staff in the form of pamphlets, and a soon-to-be posted announcement on the NRT website (http://nrt-kenya.org) plus the front pages of each Conservancy linked to a blog site (http://nrtcarbonproject.wordpress.com) where the announcement also exists and anyone can post comments anonymously about it."
Evidence Used to Assess Conformance:	PD section 6.1
Findings:	While the PD does state that a solicitation of participation and public comment period was made through distribution of NRT grazing coordinators and other staff in the form of pamphlets along with being linked to a blog about the project on the front page of the NRT website, it is not clear how the relevant and adequate information about predicted and actual benefits, costs and risks has been communicated to Smallholders/Community Members or where the evidence was provided that the information was understood.
Non-conformance Request (NCR):	Please add language to the PD sufficient to address all elements of the indicator, which are further outlined in the finding.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This will be addressed in the publically posted Monitoring Report

Findings:	Section 6 of version 2.1.2 of both the PD and monitoring report indicate that communities were informed of the project and potential benefits in two phases, the first of which was informing the communities of the multi-conservancy rotational grazing plan and its associated benefits. The second phase was informing the communities that revenues from the sale of offset credits could become available after the successful validation/verification of the project. Information regarding the benefits of rotational grazing was provided through a series of workshops and public meetings. Attendance grew through the years. The PD further states, “The carbon project, whereby yet another benefit of planned rotational grazing is presented, has been communicated much more recently due to high uncertainty in the carbon market and a reluctance to raise hopes about potential revenues.” It is assumed this means potential revenues from carbon credits was not communicated until 2015. Section 6.1.3 of the PD further states that community members were solicited to participate and make comments during the public comment period through pamphlets distributed by grazing coordinators. Responses were made by cell phone. These announcements were followed by community meetings. It is not clear whether these meetings were held to solicit comments during a required comment period or inform community members of predicted benefits and costs. It is also not clear what evidence was provided that the information was understood, as specifically required by the indicator.
Clarification Request (CL):	Please explain what occurred at the meetings described in section 6.1.3 of the PD, and whether they relate to this indicator. Please provide the evidence used to determine that the information was understood, as specifically required by the indicator.
Date Issued:	13 September 2018

Project Proponent Response/Actions and Date: 2/17/2019	Additional details of meeting events and post-meeting responses by communities are provided in section 6.1.3. Specifically, meetings reviewed past compliance with grazing plans, identified barriers to compliance, and communicated expected benefits of project activities as rotational or migratory grazing. The response of communities, especially after September 2016 meetings and workshops were improved efforts to make, write, and implement grazing plans within Conservancies. This provides evidence that community members understood the benefits of project activities and approved intensified efforts to conduct grazing plans.
Evidence used to close CL:	Section 6.3.1 now provides the evidence used to determine that the information was understood, as specifically required by the indicator. This evidence is somewhat anecdotal by nature, but is sufficient to address the indicator. Item addressed.
Date Closed:	26 April 2019

Indicator GL2.8 - Describe the project's governance and implementation structures, and any relevant self-governance or other structures used for aggregation of Smallholders/Community members, and demonstrate that they enable full and effective participation of Smallholders/Community Members in project decision-making and implementation.	Section 8.1.1 discusses the organizational structure of the project. Section 8.3.3 discusses the baseline monitoring plan.
Evidence Used to Assess Conformance:	Section 8.1.1
Findings:	While the organizational structure is provided in section 8.1.1 of the PD, and the baseline monitoring structure is outlined in section 8.3.3, neither of these sections appears to discuss the relevant self-governance or other structures used for aggregation of Smallholders/Community members, or demonstrate that they enable full and effective participation of Smallholders/Community Members in project decision-making and implementation.
Non-conformance Request (NCR):	Please add language to the PD sufficient to address all elements of the indicator, which are further outlined in the finding.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	The within-Conservancy governance and organizational structure is detailed in section 8.1.1 of the PD and includes a "path of influence" diagram

	that shows how community feedback occurs between herders and Conservancy governance and between communities and NRT.
Findings:	Section 8.1.1 of version 2.1.2 of the PD now includes a section on within-conservancy structures. Figure 27 depicts a tangled flow chart, showing paths of influence through which community members participate in grazing decisions (the main project activity). From figure 27, the governing structure within a conservancy appears to revolve around Elders, who advise a village chairman. Both the elders and chairman have influence in the Conservancy grazing committee, which creates the conservancy grazing plan. A council of Elders, perhaps an inter-conservancy council formed of elders from each conservancy, has influence directly on NRT, which has influence on the grazing committee. Women and morans together determine livestock numbers. Morans also influence livestock movements, and support elders, politically.
Clarification Request (CL):	Please clarify figure 27. Specifically, which parts of the flow chart depict entities within a conservancy and which entities are part of the larger NRT? Do morans and women constitute all members of communities?
Date Issued:	13 September 2018
Project Proponent Response/Actions and Date: 2/17/2019	New Fig. 21 in section 6.1.2 has been modified from the old Fig. 27 to respond to the clarification request.
Evidence used to close CL:	Figure 21 now includes detail regarding all entities within a conservancy. Item addressed.
Date Closed:	26 April 2019

Indicator GL2.9 - Demonstrate how the project is developing the capacity of Smallholders/Community Members, and relevant local organizations or institutions, to participate effectively and actively in project design, implementation and management.	The project discusses training and hiring of staff for various roles (grazing coordinators, rangers, etc.).
Evidence Used to Assess Conformance:	PD

Findings:	The PD relays various employments roles provided through the project but a section discussing capacity building for community members participating in project design, implementation and management could not be found.
Non-conformance Request (NCR):	Please add language to the PD sufficient to address all elements of the indicator, which are further outlined in the finding.
Date Issued:	
Project Proponent Response/Actions and Date:	This is addressed in section 8.1 of the PD, particularly in Fig. 27
Findings:	Section 8.1.1 of version 2.1.2 of the PD states that the conservancies serve as the source of most project employees involved as grazing assistants, biodiversity field techs, data entry specialists, etc. It does not say the project trains or otherwise develops the capacity of community members. Figure 27 provides a somewhat confusing representation of the paths of influence through which community members might influence project plans. It does not describe capacity development.
Non-conformance Request (NCR):	Please demonstrate how the project is developing the capacity of the communities to effectively participate in project design, implementation and management.
Date Issued:	13 September 2018
Project Proponent Response/Actions and Date:	This is addressed extensively in sections 6.1.1, 6.1.2 and 6.1.4 of the PD, particularly in Fig. 21 (in 6.1.2)
Evidence used to close NCR:	The additional detail added to section listed sufficiently address the capacity building of the communities. Item addressed.
Date Closed:	26 April 2019

Biodiversity Section

B1 Biodiversity Without-Project Scenario

Indicator B1.1 - Describe biodiversity within the Project Zone at the start of the project and threats to that biodiversity, using appropriate methodologies.	Section 1.3.4 of the PD describes baseline biodiversity at a high level. Section 7.1 describes the sampling intensity and approach (high level) for baseline biodiversity (fauna) in the project areas.
Evidence Used to Assess Conformance:	PD section 1.3.4 and section 7.1
Findings:	The scale of the baseline sampling appears considerably small compared to the size of the overall project: six sites over 2 million hectares. More information is needed (source/basis for sampling design, how sampling intensity was determined) before a determination can be made

	regarding appropriateness/accuracy of the baseline sampling.
Non-conformance Request (NCR):	Please provide the source and a discussion of the basis (literature) for the sampling design. Please provide a discussion of how the sampling intensity was selected and how the plot distribution was determined and how both were determined to be appropriate. Please provide the locations/distribution of the sample plots.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This has been addressed in great detail in section 8.1.4 of the PD
Findings:	Version 2.1.2 of the PD, section 8.1.4 states the biodiversity sampling plan has two scales, one focusing on project-wide assessments on key wildlife species and the other involves focused surveys of key indicator species, comparing diversity in areas with different grazing management. In the more focused surveys of key indicator species, the PD states that five camps should be sufficient to detect change in biodiversity, given the relatively uniform soils, rainfall and vegetation (citation:Malubres-Olarte, et al.). The project-wide assessment of key wildlife species will depend on observations by game scouts. Figure 29 is a map showing the locations of biodiversity camps, though 4 and not 5 are shown. (Melako camp, Sera camp, Kalama camp, and the Westgate camp can be seen. If a fifth camp is on the map, it is obscured by labels and other symbols, showing what may be sampling sites.) Camps were chosen based on proximity to suitable sampling sites that include: Old bomas Non-boma sites in protected strata Core areas Buffer areas Settlement areas. This is said to represent optimized sampling, and the citation is Malubres-Olarte. Sampling camps are all located in the central, southern or western portions of the project area. None are found in the northern or eastern areas.

	Vast areas of clay loam are not represented. This may be for safety reasons, but no reason is provided.
Clarification Request (CL):	Please show all 5 sampling camps on the map provided in the PD. Please include a legend explaining all that is depicted on the map. Please explain why vast areas of the project area are not sampled, in spite of apparent differences in these areas, based on soils and precipitation.
Date Issued:	7 September 2018
Project Proponent Response/Actions and Date: 2/25/2019	Biodiversity of indicator groups is typically only expressed when it rains, and for much of the project area, this happens only in April and May. Therefore all sampling stations must be sampled during that window. Given the intensity of the sampling (traps, multiple plots, bird surveys that take an entire morning), this can only be accomplished at a limited number of sites. The sites we chose span the range of major vegetation types (*Commiphora*, *Acacia*), rainfall (400 – 800 mm annual rainfall) and on different soil classes and so encompasses much of the range of environmental factors experienced on the project area. Much more extensive sampling of wildlife through the activities of game scouts gives a broader coverage. Text added to bottom of section 8.1.4.1.
Finding:	While the argument provided helps to explain the timing and constraints on sampling, it is still unclear how the northern and eastern portions of the project are accurately being represented if no sampling is taking place in those regions. Are these areas intended to be added to sampling in the future?
Clarification Request (CL):	Please address the finding to clarify how these areas are being accurately represented given the sampling constraints.
Date Issued:	26 April 2019
Project Proponent Response/Actions and Date:	From section 8.1.4.1 of the PD: Five camps should be sufficient to detect change in biodiversity due to project activities, given the relative uniformity of soils, annual rainfall amounts, vegetation, and land use across savanna/grasslands in the project zone. **The design represents "optimized sampling," and should produce similar results to standard, randomized survey sampling at a larger number of randomly distributed sites** (Malumbres-Olarte et al 2017)] (Provided in NKCP Round 3 new docs). These sites will be selected randomly from within different management and soil strata (protected, old boma, settlement) all within 10 km of a camp site

	selected to allow traps and bird surveys to be checked in a reasonable time on multiple days and to compare measures at sites with similar rainfall. Again, our purpose is to determine the effect of improved grazing practices and increased soil carbon on indicator groups, not to monitor biodiversity across a random samples of the project area. Such extensive indicators of change in biodiversity will be restricted to large mammals surveyed by observations by game scouts in NRT's Wildlife CoMMs program, as discussed in the previous section. Nevertheless, the five camps span the range of rainfall (300-800 mm/yr (Fig. 10) and over 95% of the soil carbon values measured in baseline, so while the study may may not have spatially representative sampling, it represents the vast majority of vegetation, soil, and climate conditions in the project zone.
Findings:	There is no section 8.1.4.1 in v2.1.4 of the PD, but section 7.1.4.1 appears to be the intended section. The Malumbres-Olarte article mentions that the methods used in all methods examined in the article are designed to estimate species richness with a low number of samples on the tenth page of the article. It is not an article that explains the principle of using a few plots to gauge a change in species diversity, however the use of such methods to measure this change is understood. Only 4 sampling camps can be discerned on figures 30 and 40 of the PD and monitoring report, respectively: Melako Camp, Sera Camp, Kalama Camp and Westgate Camp can be seen, but some are at least partly obscured by other labels and points that are included on the figure, that don't seem to be needed. The 4 sites shown appear to exclude clay soils, which is considered an important stratum, according to other parts of the PD. The map figures do not include legends explaining the color coding and other features on the map.
Clarification request	See the most recent findings. Please: Show all 5 sampling camps on the figures in question.

	If, after adding the fifth sampling camp to the map figures, no sampling camps exist on clay soils, please explain why this stratum is not sampled. Include a legend, explaining all displayed features and color coding, for the map figures. Remove unnecessary information included in these figures, which seem to be artifacts from another figure.
Date issued:	24 May 2019
Project Proponent Response/Actions and Date:	Black soil (clay) sampling sites were added to the Sera and Westgate camps. They were already present in the Melako, Kalama, and Lekurruki camps. Clay loam is in parts of the project area that are very difficult to access. They are accessible either on foot or by helicopter. The area is not secure enough for team members not members of Melako or Biliqo Bulesa Conservancies to expediation on foot, and helicopters are prohibitively expensive. The major vegetation types, which drive diversity across the project area, for clay loam soils are similar to those in sandy loam soils, so therefore we didn't think it is worth the great expense of running camps in regions that are extremely difficult to access.
Findings:	All five sampling camps are now visible in figure 30 of the PD. The dangers of the far reaches of the Biliqo Bulesa conservancy were discussed during site visits. It is reasonable to place camps of this nature in more secure parts of the project area. Item closed.
Date closed:	2 July 2019

Indicator B1.2 - Evaluate whether the Project Zone includes any of the following High Conservation Values (HCVs) related to biodiversity and describe the qualifying attributes for any identified HCVs: a. Globally, regionally or nationally significant concentrations of biodiversity values; i. protected areas108 ii. threatened species109 iii. endemic species110 iv. areas that support significant concentrations of a species during any time in their lifecycle. b. Globally, regionally or nationally significant large landscape-level areas where viable populations of	Section 1.3.4 of the PD states "The project zone includes multiple High Conservation Value (HCV) areas, including at least 11 established protected areas (Core areas) within Conservancies plus the nationally protected Mathews Forest Reserve, a "sky" island containing many of the same endemic bird, primate and amphibian species as found in the nearby Kenya Mountains Endemic Bird Area[8] to the south of the project area. Samburu, Buffalo Springs and Shaba National Reserves interdigitate with several participating Conservancies in the south along the permanent Ewaso Nyiro River, and Losai and Marsabit National Reserves border the Melako Conservancy in the north."

most if not all naturally occurring species exist in natural patterns of distribution and abundance; c. Threatened or rare ecosystems. Identify the areas that need to be managed to maintain or enhance the identified HCVs.	
Evidence Used to Assess Conformance:	PD section 1.3.4
Findings:	The PD appears to indicate that HCVs exist for a. Globally, regionally or nationally significant concentrations of biodiversity values; b. Globally, regionally or nationally significant large landscape-level areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance; c. Threatened or rare ecosystems. However it does not specifically state this, only that HCV areas exist. The PD needs to list exactly which HCV indicators the project qualifies for.
Non-conformance Request (NCR):	Please state in the PD exactly which HCVs the project qualifies for and how the project qualifies.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is already addressed in detail in section 7.4 of the PD
Findings:	Section 7.4 no longer exists in version 2.1.2 of the PD. However, section 1.3.4 states the project area includes two endangered species (Grevy's zebra and black rhino) and other species of "conservation interest." Further, the PD mentions there are several species and subspecies that are endemic to the region. There is no discussion or analysis of biodiversity-related HCVs, using the definitions provided by CCBA, including statements on which of the HCVs the project area includes, a comprehensive list of the species that indicate the project area has these HCVs, or the citation of any studies showing the project area possesses HCVs.
Non-conformance Request (NCR):	Please review the CCB definitions of HCVs, definitively state which HCVs the project area possesses and list all species and factors that

	demonstrate the area possesses HCVs. Provide this in the PD.
Date Issued:	7 September 2018
Project Proponent Response/Actions and Date: 2/27/2019	This is discussed in sections 1.3.4 and in 7.1, along with a theory of change and causal model for influencing biodiversity HCV's in Fig.3 in section 1.3.4.
Finding:	The PD currently lists many aspects of the flora and fauna that do qualify as high conservation values, however IT DOES NOT STATE EXPLICITLY THE EXACT HIGH CONSERVATION VALUE FOR EACH OF THE QUALIFYING ATTRIBUTES, AS REQUIRED BY THIS REQUIREMENT. For example, possibly the Mathews Forest Reserve qualifies as a. i.. (Globally, regionally or nationally significant concentrations of biodiversity values; i. protected areas108). If yes, then you would further describe how it qualifies, please specifically review the CCB guidance on qualification criteria and how it must be listed.
Non-Conformance Request (NCR):	See and address all language in the finding.
Project Proponent Response/Actions and Date: 4/27/2019	The language and qualification criteria are explicitly addressed in a revised section 1.3.4 of the PD and MR
Findings:	Sections 1.3.4 of the PD and monitoring report state that the project area includes national parks (Samburu, Buffalo Springs and Shaba National Reserve), Forest Reserves (Mukugodo and Matthews Forest Reserves) and endangered species (black rhino, Grevy's zebra, beisa oryx and reticulated giraffe. Significant populations of other vulnerable species also occur in the project zone (African elephant, gerenuk, lion, cheetah and wild dog.) The project area/zone includes HCVs a-i and a-ii. Item closed.
Date closed:	28 May 2019

Indicator B1.3 - Describe how the without-project land use scenario would affect biodiversity conditions in the Project Zone.	The PD states "Given the HCV of the project zone, and the multiple beneficial effects expected from implementing planned rotational grazing, the project is expected to the increase species diversity of multiple taxa, including plants[11,22,23], birds[13,24] and arthropods[12,13,15,25] across the 2 million ha in the project area and elsewhere in the project zone. Our baseline data suggest that project activities in the project zone and during the project lifetime will

	increase the diversity of herbaceous plants and trees, and definitely exhibit no harm to the arthropod groups and birds. This will allow current or recent past measurements of the baseline 'without project' biodiversity scenario to be compared to the biodiversity in the 'with project' scenario where the difference (i.e., the net biodiversity benefit) is expected to be positive."
Evidence Used to Assess Conformance:	PD section 1.3.4
Findings:	The PD sufficiently describes the anticipated without project impacts on biodiversity

B2 Net Positive Biodiversity Impacts

Indicator B2.1 - Use appropriate methodologies to estimate changes in biodiversity, including assessment of predicted and actual, positive and negative, direct and indirect impacts, resulting from project activities under the with-project scenario in the Project Zone and over the project lifetime. This estimate must be based on clearly defined and defendable assumptions.	The PD states that previous studies (Glew, King, Roba articles listed in reference section of PD) suggest planned rotational grazing and associated rangeland recovery will enhance the population of large ungulates and associated carnivore species. The PD further states that Grevy's zebra, beisa oryx and reticulated giraffe have all expanded range and increased in density since the start of the project. Highest densities occur in "core" and "buffer" areas that received the most protection. There was a decrease in elephant poaching since the start of the project, which is attributed to the presence of game scouts and grazing coordinators in the field.
Evidence Used to Assess Conformance:	Section 7.1 of version 2.1.2 of the PD, Glew paper
Findings:	Biodiversity impacts are expected to be positive, which is backed by scholarly studies, the early results of the greater presence of game scouts and other project officials in the field and by higher densities of wildlife found in the more protected areas. Reported sightings of three umbrella species (reticulated giraffe, Grevy's zebra, Beisa oryx) have increased since the baseline study. Impacts appear to be related to both the presence of more people in the field and increase in availability of quality forage. Item closed.
Date Closed:	7 September 2018

Indicator B2.2 - *Demonstrate* that the project's net impacts on biodiversity in the Project Zone are positive, compared with the biodiversity conditions under the without-project land use scenario (described in B1).	Section 7.1 describes"The anticipated increase in grazing options within the project area should reduce pressure to use protected areas for forage during dry seasons or droughts. Previous studies in the NRT or northern Kenya area[1,6,7,10,11] strongly suggest that planned rotational grazing and rangeland recovery will enhance numbers of large ungulate and associated carnivore species and increase plant diversity[12-15]. However, the impacts of rangeland restoration and soil carbon storage on other potential conservation values are poorly documented outside major, well-studied protected areas. Nevertheless the project is expected to the increase species diversity of multiple taxa, including plants[11,22,23], birds[13,24] and arthropods[12,13,15,25], and our baseline data for areas with different conservation history (Fig. 3, section 2.4.1) suggest that project activities will enhance diversity of multiple previously under-sampled groups.
Evidence Used to Assess Conformance:	Section 7.1
Findings:	The discussion supports topically what is a likely result of improved forage – an increase in ungulates and carnivores, and their associated species. Separately, the references provided are not discussed at length nor specific sections referenced so it is not fully clear how they support the argument. Additionally, indicator B1 is pending responses, so this indicator is also pending those responses.
Non-conformance Request (NCR):	In the PD please describe further how the references provided support the argument that grazing will increase biodiversity onsite. This indicator is also pending responses to indicator B1.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	We actually show data for the biodiversity indicator taxa of birds, trees, herbaceous plants, grasshoppers, and dung beetles that directly address this finding as well as it can be at the beginning of the project. New data on documented changes in wildlife species across the project area have been added to address the scale issue brought up in B1
Evidence Used to Close NCR:	Section 7.1 of the PD, Glew 2012 paper. Version 2.1.2 of the PD includes some results of wildlife scout observational studies taken in 2012, for the baseline, and results from 2015. Sightings and densities of three umbrella species increased. In addition, fewer elephants have been poached in the area since the start of the project (attributed to

	increased patrolling by game scouts and grazing coordinators. The project also made baseline measurements of species diversity in the indicator groups of plants, birds, grasshoppers and dung beetles in different areas (core, buffer, settlement) that indicate an improved range will also increase biodiversity. The Glew article states that the initial change to conservancy management (2000-2007) in the NRT lands resulted in significant improvement to habitat conditions, coinciding with improvements in range conditions. Item closed.
Date Closed:	7 September 2018

Indicator B2.3 - Describe measures needed and *taken* to mitigate negative impacts on biodiversity and any measures needed and *taken* for maintenance or enhancement of the High Conservation Value attributes (identified in B1.2) consistent with the precautionary principle.	PD section 7.2 describes offsite negative impacts and anticipated actions that will minimize and reduce these impacts.
Evidence Used to Assess Conformance:	PD section 7.2
Findings:	The PD describes the negative offsite impacts and mitigating actions through creation of grass banks, but it could not be found where the on-site negative impacts are discussed. Though it is agreed that the project action is likely to produce better forage and increase biodiversity, a statement needs to be added to the PD to address this indicator.
Non-conformance Request (NCR):	Please add a section to the PD discussing the likelihood of negative onsite impacts and any mitigating actions needed.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	These are already described in section 7.3 of the PD.
Findings:	Section 7.3 of version 2.1.2 of the PD discusses GMOs and the use of pesticides and fertilizers. No discussion of potential on-site negative biodiversity impacts was found, likely because none are expected.

Non-conformance Request (NCR):	See the original NCR. This indicator is about potential negative biodiversity impact on-site. Please add a section to the PD and include the discussion.
Date Issued:	7 September 2018
Project Proponent Response/Actions and Date: 2/26/2019	Negative on-project community effects, and their mitigation, are discussed in new section 6.2.4, p. 94
Findings:	Section 6.2.4 is for negative community impacts. Section 7.2 addresses negative offsite biodiversity impacts and mitigation. The narrative appears to sufficiently detail impacts and mitigation, and addresses the specific question related to grass banks. Item addressed.
Date Closed:	26 April 2019

Indicator B2.4 - *Demonstrate* that no High Conservation Values (identified in B1.2) are negatively affected by the project.	Pending response to indicator B1.2
Evidence Used to Assess Conformance:	PD
Findings:	Pending response to indicator B1.2
Non-conformance Request (NCR):	Pending response to indicator B1.2
Date Issued:	16 September 2015
Comment and date:	Still pending response to indicator B1.2. 7 September 2018
Project Proponent Response/Actions and Date:	
Comment and date:	Still pending response to indicator B1.2 4 April 2019
Findings:	Section B1.2 has now been closed. The PD states that the principal threats to biodiversity in the project zone come from illegal hunting (elephants and rhinos), overgrazing and the frequent use of protected areas during droughts. Project activities increase game scout patrols, improve range for grazing and reduce the need to use protected areas during droughts. The PD goes on to say that not all potential effects of the project activities are known, especially in regard to species that are not large ungulates or predators. However, a causal model is employed to show the likely consequences to biodiversity from project activities are positive (figure 3.). Item closed.
Date closed:	28 May 2019

Indicator B2.5 - Identify all species used by the project and *show* that no	Section 7.1 of the PD states “The project will not introduce any non-native or GMO species into the

known invasive species are introduced into any area affected by the project and that the population of any invasive species does not increase as a result of the project.	project area, as re-seeding or plantings are not a project activity. Project activities merely adjust the way in which livestock are herded and moved across the landscape."
Evidence Used to Assess Conformance:	PD section 7.1
Findings:	The PD sufficiently states that no no-native or GMO species will be introduces as project activities only involve shifting of grazing rotation. Grass for seed backs will be harvested locally.

Indicator B2.6 - Describe possible adverse effects of non-native species used by the project on the region's environment, including impacts on native species and disease introduction or facilitation. Justify any use of non-native species over native species.	n/a
Evidence Used to Assess Conformance:	n/a
Findings:	n/a

Indicator B2.7- *Guarantee* that no GMOs are used to generate GHG emissions reductions or removals.	Section 7.1 of the PD states "The project will not introduce any non-native or GMO species into the project area, as re-seeding or plantings are not a project activity. Project activities merely adjust the way in which livestock are herded and moved across the landscape."
Evidence Used to Assess Conformance:	PD section 7.1
Findings:	The PD sufficiently states that no no-native or GMO species will be introduces as project activities only involve shifting of grazing rotation. Grass for seed backs will be harvested locally.

Indicator B2.8 - Describe the possible adverse effects of, and justify the use of, fertilizers, chemical pesticides, biological control agents and other inputs used for the project.	Section 4.2 of the PD states "The people in the project area are virtually all pastoralists using unimproved rangeland and do not import fertilizer from outside the project area. People generally lack the finances, land ownership, or access to irrigation water to foster the establishment of improved pastures. The unimproved rangelands are used for grazing by livestock and wildlife and for gathering honey or other foodstuffs."
Evidence Used to Assess Conformance:	PD section 4.2

Findings:	The PD sufficiently addresses fertilizers, but does not specifically address the other elements of the indicator (pesticides, biologic control agents). Though it is understood that finances are likely to limit the use of these additives, they need to be specifically discussed in the PD.
Non-conformance Request (NCR):	In the PD please specifically address the other elements of the indicator (pesticides, biologic control agents).
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is now addressed in section 7.3 of the PD
Evidence Used to Close NCR:	Section 7.3 of version 2.1.2 of the PD states that project activities will not involve the use of fertilizers or pesticides, whether chemical or biological. Project activities only involve the movement of livestock across the landscape. Item closed.
Date Closed:	7 September 2018

Indicator B2.9 - Describe the process for identifying, classifying and managing all waste products resulting from project activities.	Waste products are not discussed.
Evidence Used to Assess Conformance:	PD
Findings:	Though an understanding of the project actions would lead the reviewer to believe there are no waste products to be generated from the project, CCB requires that project address every element of the indicators.
Non-conformance Request (NCR):	In the PD please provide a statement relating to the identifying, classifying and managing all waste products resulting from project activities.
Date Issued:	16 September 2016
Project Proponent Response/Actions and Date:	This is addressed in section 7.3 of the PD
Evidence Used to Close NCR:	Section 7.3 of version 2.1.2 of the PD states, “Project activities do not involve generation of power, conversion of energy sources, or processing of materials and so will not increase or produce waste products.” Given the nature of the project and the limited project activities (rotational grazing and monitoring) auditors agree there is no point in developing a process for identifying, classifying and managing wastes. Item closed.
Date Closed:	7 September 2018

B3 Offsite Biodiversity Impacts

Indicator B3.1 - Identify potential negative impacts on biodiversity that the project activities are likely to cause outside the Project Zone.	Section 7.2 of the PD speaks to the likelihood of offsite negative impacts, citing the chance that during required periods of rest from of the grazing areas, some herders in the Namunyak Conservancy may be tempted to move livestock into the adjacent Mathews Forest. It states that this potential will gradually disappear once the grass banks are established.
Evidence Used to Assess Conformance:	PD section 7.2
Findings:	The discussion in the PD is sufficient to address the concerns for the Matthews Forest. As there are currently offsite herders who move their herds onto project areas and have historically done so, what are the implications for these offsite herders during periods of necessary rest for the on-site grazing areas and the grass banks are under pressure from on-site herders? Will they move to other off-site areas with no rotational controls and potentially degrade these areas?
Non-conformance Request (NCR):	Please address the risk that offsite herders during periods of necessary rest for the on-site grazing areas will move to other off-site areas with no rotational controls and potentially degrade these areas.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is addressed in section 7.2 of the PD, last paragraph.
Evidence Used to Close NCR:	Section 7.2 of version 2.1.2 of the PD mentions that herders from communities outside the project area have traditionally come onto the project area when forage was available. Increased efforts to reserve grass banks in the project area (excluding outside herders) may lead to over grazing outside the project area. The mitigation plan is to make agreements to allow these herders to move livestock where instructed in order to support the rotational grazing plan. Item closed.
Date Closed:	7 September 2018

Indicator B3.2 - Describe the measures needed and *taken* to mitigate these negative impacts on biodiversity outside the Project Zone.	Section 7.2 of the PD speaks to the likelihood of offsite negative impacts, citing the chance that during required periods of rest from of the grazing areas, some herders in the Namunyak Conservancy may be tempted to move livestock into the adjacent

	Mathews Forest. It states that this potential will gradually disappear once the grass banks are established.
Evidence Used to Assess Conformance:	PD section 7.2
Findings:	Section 7.2 of version 2.1.2 of the PD states the mitigation plan for project-caused overgrazing on off-project lands is to make agreements with herders who traditionally used the project area, to allow them to graze, provided they follow the rotational grazing plan. Item closed.
Non-conformance Request (NCR):	
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	
Date Closed:	7 September 2018

Indicator B3.3 - Evaluate unmitigated negative impacts on biodiversity outside the Project Zone and compare them with the project's biodiversity benefits within the Project Zone. Justify and demonstrate that the net effect of the project on biodiversity is positive.	This indicator was not addressed in the PD or was not found.
Evidence Used to Assess Conformance:	Section 7 of the PD.
Findings:	This indicator was not addressed in version 2.1.2 of the PD.
Non-conformance Request (NCR):	Please address indicator B3.3 in the PD.
Date Issued:	7 September 2018.
Project Proponent Response/Actions and Date:	The Ogutu et al 2016 paper was used as an off-project indicator against which increases in numbers and distribution of elephants and three of the endangered species (reticulated giraffe, Grevy's zebra, and oryx) are compared. This is in section 7.1 near the top of p. 96
Findings:	Though section 7.1 goes into great detail regarding the benefits of the project and does provide substantial support that it is net positive, and section details negative off-site biodiversity impacts, neither section appears to detail unmitigated negative impacts on biodiversity outside the Project Zone and compare them with the project's biodiversity benefits within the Project Zone.
Non-conformance Request (NCR):	Please include in the PD a description of unmitigated negative impacts on biodiversity outside the Project

	Zone and compare them with the project's biodiversity benefits within the Project Zone.
Date Issued:	26 April 2019
Project Proponent Response/Actions and Date:	A paragraph has been added to the end of section 7.2 that states how rangeland degradation and lack of wildlife protection should lead to even lower biodiversity outside the project zone.
Findings:	The unmitigated effects of the project outside the project zone are described as a lack of protection of wildlife, compared to the situation within the project zone. The lack of wildlife protection outside the project zone is not an effect of the project. The PD also described temporary negative effects of moving herds into the protected forests and cutting small trees and branches to feed livestock. It appears the net effects of the project on biodiversity will be positive. However, a list of positive biodiversity effects and negative biodiversity effects, showing the net effect on biodiversity is positive, is not provided.
Clarification request (CL):	Please "…compare [unmitigated negative impacts on biodiversity outside the Project Zone] with the project's biodiversity benefits within the Project Zone. Justify and demonstrate that the net effect of the project on biodiversity is positive. Show this comparison within project documentation.
Project Proponent Response/Actions and Date:	A table comparing Unmitigated Negative impacts on biodiversity outside Project Zone to Net Positive Biodiversity with Project can be found in section 6.2 in the PD and 7.2 in the MR
Findings:	The new table now appears in section 6.2 of the 11 June 2019 version of the PD. The main negative off-site impacts on biodiversity appear to be land degradation due to overgrazing and relative lack of wildlife protections in comparison with the project area. If project activities exacerbated range degradation offsite or increased poaching offsite, these impacts are likely to be relatively slight, especially in comparison with the benefits of increased range quality, habitat and patrolling in the with-project scenario. Item closed.
Date closed:	2 July 2019

B4 Biodiversity Impact Monitoring

Indicator B4.1 - Develop and implement a monitoring plan that identifies biodiversity variables to be monitored, the areas to be monitored, the sampling methods, and the frequency of monitoring and reporting. Monitoring variables must be directly linked to the project's biodiversity objectives and to predicted activities, outcomes and impacts identified in the project's causal model related to biodiversity (described in G1.8).	Section 8.1.4 of the PD and PIR provides a detailed plan for sampling biodiversity and focuses on Ungulates and other large mammals, birds, plants, grasshoppers and dung beetles (indicator species).
Evidence Used to Assess Conformance:	PD and PIR section 8.1.4
Findings:	The monitoring plan appears detailed in its consideration of the elements sampled. The geographic extent of the surveys is not clear. Was the sampling design random or systematic? It is also unclear what was the basis for the determination of the sampling intensity.
Non-conformance Request (NCR):	In the PD and PIR please clarify what the geographic extent/distribution of the survey's was. Please clarify if the sampling design was random or systematic. The clarify what the basis was for the determination of the sampling intensity.
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is addressed in the two sections Project-wide wildlife assessment and Surveys of key indicator species in section 8.1.4.2 of the PD A map of the indicator species surveys is provided in Fig. 29.
Evidence Used to Close NCR:	Version 2.1.2 of the PD describes biodiversity monitoring at two scales: One is a project wide assessment that is conducted by game scouts and grazing coordinators making daily reports on sightings of a list of carnivores, endemic and endangered species. The other involves focused surveys of indicator species to compare diversity in areas with different grazing management. The project-wide assessment is described as systematic, except that observations will be weighted according to "effort density," which is determined through the use of GPS recordings at fixed time intervals by scouts on patrol. Surveys of indicator species will take place at five fixed locations every 3 years, on lands of different management types. The PD reiterates the purpose is

	to compare the effects of the new grazing practices and not to monitor biodiversity over a random sample of the project area. Item closed.
Date Closed:	10 September 2018

Indicator B4.2 - Develop and implement a monitoring plan to assess the effectiveness of measures taken to maintain or enhance all identified High Conservation Values related to globally, regionally or nationally significant Biodiversity (identified in B1.2) present in the Project Zone.	Pending indicator B1.2
Evidence Used to Assess Conformance:	Pending indicator B1.2
Findings:	Pending indicator B1.2
Non-conformance Request (NCR):	Pending indicator B1.2
Date Issued:	16 September 2015
Non-conformance Request (NCR):	Pending indicator B1.2
Date Issued:	26 April 2019
Evidence Used to Assess Conformance:	Section 7.1.4 of the PD.
Findings:	The project HCVs include protected areas (like national parks and forest reserves) and a number of endangered and threatened species, including black rhinos. A biodiversity monitoring plan is provided, using project wide assessments of key wildlife species, carried out by game scouts, as well as focused surveys in 5 camps that are carried out once every three years. Details of the focused surveys are provided. Results will be analyzed by experts in the various categories of wildlife/plantlife. Item closed.
Date closed:	28 May 2019

Indicator B4.3 - Disseminate the monitoring plan and the results of monitoring, ensuring that they are made publicly available on the internet and summaries are communicated to the Communities and Other Stakeholders through appropriate means.	The carbon project, whereby yet another benefit of planned rotational grazing is presented, has been communicated much more recently due to high uncertainty in the carbon market and a reluctance to raise hopes about potential revenues. However, the Conservancies began on 15 May 2015 a solicitation of participation and public comment period, with announcement and information about the project distributed by NRT grazing coordinators and other staff in the form of pamphlets, and a soon-to-be posted announcement on the NRT website (http://nrt-kenya.org) plus the front pages of each

	Conservancy linked to a blog site (http://nrtcarbonproject.wordpress.com) where the announcement also exists and anyone can post comments anonymously about it.
Evidence Used to Assess Conformance:	PD Section 6.1
Findings:	While the project has submitted pamphlets to communities in the project area and awareness of the project appears to be high, particularly due to the involvement of the community grazing committees, at the time of the site visit the local language summaries of the PD and PIR did not appear to have been distributed. When discussed with the project proponent they stated that the documents would be distributed after the site visit, and photographic evidence would be provided that all communities were reached.
Non-conformance Request (NCR):	Pending Indicator G3.1
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	
Findings:	Photographic evidence of posted project summaries (in English) were provided for 10 of the conservancies. G3.1 still open at this time
Non-conformance Request (NCR):	Pending Indcator G3.1
Date Issued:	
Project Proponent Response/Actions and Date:	
Evidence Used to Close NCR:	Indicator G3.1 is closed. Photographic evidence was provided for 10 conservancies. Item closed.
Date Closed:	28 May 2019

GL3 Exceptional Biodiversity Benefits

Indicator GL3.1 - Demonstrate that the Project Zone includes a site of high biodiversity conservation priority by meeting either the vulnerability *or* irreplaceability criteria defined below, identifying the 'Trigger' species that cause(s) the site to meet any of the following qualifying conditions and providing evidence that the qualifying conditions are met: 1.1 Vulnerability Regular occurrence of a globally threatened species (according to the IUCN Red List) at the site:	Under the cover page of the PD, the project states: "Gold Level Criteria Biodiversity: Studies clearly show that shifts from continuous to planned rotational grazing can improve biodiversity of multiple taxonomic groups. Project activities will also improve habitat for endangered and endemic wildlife species such as elephant, reticulated giraffe, Grevy's zebra, black rhino, gerenuk, etc. Project activities should also reduce impacts of livestock on isolated "sky island" forests such as the Mathews and Mukugodo".

a. Critically Endangered (CR) and Endangered (EN) species - presence of at least a single individual; or b. Vulnerable species (VU) - presence of at least 30 individuals or 10 pairs. OR 1.2 Irreplaceability A minimum proportion of a species' global population present at the site at any stage of the species' lifecycle according to the following thresholds: a. Restricted-range species - species with a global range less than 50,000 km2 and 5% of global population at the site; or b. Species with large but clumped distributions - 5% of the global population at the site; or c. Globally significant congregations - 1% of the global population seasonally at the site; or d. Globally significant source populations - 1% of the global population at the site.	
Evidence Used to Assess Conformance:	PD section cover page
Findings:	It is not clear where the PD addresses this indicator. Details need to be added to the PD stating specifically how this indicator (GL3.1) was met.
Non-conformance Request (NCR):	Please add language to the PD detailing how the project specifically addresses this indicator (GL3.1).
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is addressed in section 7.4 of the PD.
Evidence Used to Close NCR:	There is no section 7.4 in version 2.1.2 of the PD, however some pertinent information is included in section 7.3. The PD states that several vulnerable species occur in the project area, including African elephants (VU), black rhino (CR), Grevy's zebra (EN), lion (VU), cheetah (VU), wild dog (EN). Several other near-threatened species are also mentioned. The PD further states that several endemic species are present in the project area, but does not relate

	this to any of the criteria described in part 1.2 of this indicator. The project zone includes a Project Zone includes a site of high biodiversity conservation priority by virtue of the presence of vulnerable species. Item closed.
Date Closed:	10 September 2018

Indicator GL3.2 - Describe recent population trends of each of the Trigger species in the Project Zone at the start of the project and describe the most likely changes under the without-project land use scenario.	It is not clear where this is located in the PD.
Evidence Used to Assess Conformance:	PD
Findings:	It is not clear where the PD specifically addresses this indicator. Details need to be added to the PD stating specifically how this indicator (GL3.2) was met.
Non-conformance Request (NCR):	Please add language to the PD detailing how the project specifically addresses this indicator (GL3.2).
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is addressed in section 7.4. by citing the recent review of wildlife population changes by Ogutu et al. 2016.
Findings:	Section 7.4 is no longer included in version 2.1.2 of the PD. Section 7.3 now includes information on exceptional biodiversity benefits. Population trends, since the start of the project, are discussed for the reticulated giraffe, Grevy's zebra and the Beisa Oryx. No discussion of wildlife populations in the 'without project' scenario was found in the PD. The Ogutu paper does say the populations of wildlife dropped by 68% between 1977 and 2016, which one would assume would continue in the 'without project' scenario.
Non-conformance Request (NCR):	Please address this indicator within the PD.
Date Issued:	10 September 2018
Project Proponent Response/Actions and Date:	This is now addressed in section 7.3 of the PD and MR. Trigger species are identified as four endangered ungulates (as classified by IUCN) and Ogutu et al 2016 and a Kenya Wildlife Service report are used as evidence that these species are declining outside protected areas

Evidence Used to Close NCR:	Section 7.3 is for "Project Use of Fertilizers, Pesticides, Biocontrol Agents, and Waste Products" and does not address this requirement.
Project Proponent Response/Actions and Date:	Section 7.4 addresses the finding, as there is now a clear discussion of baseline and project scenarios, supported by results from the Ogutu et al. (2016) study, and Wildlife CoMMs data from section 7.1
Findings:	There is no section 7.4 in the PD or monitoring report. The project developers appear to be referring to section 6.4 of the PD and 7.3 of the monitoring report. These sections identify 4 trigger species (black rhino, Grevy's zebra, beisa oryx and reticulated giraffe). All four species would likely decline in the without project scenario, based on a survey by Ogutu, et al. Black rhinos only exist in protected areas, due to poaching. The other three species are under pressure from habitat degradation and poaching, and have declined by 45 – 80%. Item closed.
Date Closed:	29 May 2019

Indicator GL3.3 - Describe measures needed and *taken* to maintain or enhance the population status of each Trigger species in the Project Zone, and to reduce the threats to them based on the causal model that identifies threats to Trigger species and activities to address them.	It is not clear where this is located in the PD.
Evidence Used to Assess Conformance:	PD
Findings:	It is not clear where the PD specifically addresses this indicator. Details need to be added to the PD stating specifically how this indicator (GL3.3) was met.
Non-conformance Request (NCR):	Please add language to the PD detailing how the project specifically addresses this indicator (GL3.3).
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is addressed in section 7.1 of the PD.
Findings:	Section 7.1 of version 2.1.2 of the PD states, "The project will not specifically undertake specific management actions to increase any specific component of biodiversity or endangered or vulnerable species." Then goes on to say that

	stakeholders and partners with NRT will address some specific conservation concerns. Elephant killings are down and sightings of some key indicator species are up. This is attributed, in part, to conservancy member (game scouts and grazing coordinators) being more engaged across the landscape. Also, since more sightings were made in buffer and core areas, rangeland recovery is expected to benefit wildlife, as well.
Non-conformance Request (NCR):	Please identify the trigger species, threats to them (identified by a causal model) and discuss how NRT personnel engaging across the landscape and improvements to forage are expected to address the threats to the trigger species.
Date Issued:	10 September 2018
Project Proponent Response/Actions and Date:3/3/2019	Trigger species are identified and the linkage between their conservation and project activities is made in section 7.3 of the PD and MR.
Finding:	The PD does not describe the trigger species and the status for each. However, as specifically required by this requirement it does not “describe the most likely changes under the without-project land use scenario.”
Non-conformance Request (NCR):	Please address the finding and “describe the most likely changes under the without-project land use scenario.”
Date Issued:	26 April 2019
Project Proponent Response/Actions and Date: 4/27/2019	This is now addressed at the end of section 7.4 of the PD and MR. Trigger species are identified as four endangered ungulates (as classified by IUCN) and Ogutu et al 2016 and a Kenya Wildlife Service report are used as evidence that these species are declining outside protected areas. There is now a clear discussion of baseline and project scenarios, supported by results from the Ogutu et al. (2016) study, and Wildlife CoMMs data from section 7.1
Findings	There is no section 7.4 of either the PD (v2.1.4) or the monitoring report (v2.3. The project proponent is referring to sections 6.4 of the PD and 7.3 of the monitoring report. These sections of the PD and monitoring report state that all four trigger species will benefit from project activities due to improvement in rangeland productivity. Figure 35 shows that for 3 species, sightings have increased in the project area, compared to the baseline. Black rhinos are mostly limited by illegal poaching, but some were

	transferred to the Sera conservancy in a core area. Item closed.
Date closed:	29 May 2019

Indicator GL3.4 - Include indicators of the population trend of each Trigger species and/or the threats to them in the monitoring plan and demonstrate the effectiveness of measures needed and taken to maintain or enhance the population status of Trigger species.	It is not clear where this is located in the PD.
Evidence Used to Assess Conformance:	PD
Findings:	It is not clear where the PD specifically addresses this indicator. Details need to be added to the PD stating specifically how this indicator (GL3.4) was met.
Non-conformance Request (NCR):	Please add language to the PD detailing how the project specifically addresses this indicator (GL3.4).
Date Issued:	16 September 2015
Project Proponent Response/Actions and Date:	This is addressed in section 8.1.4 of the PD with the description of the Wildlife CoMMs program and observational sampling plus the addressing of management actions in section 7.1 of the PD.
Evidence Used to Close NCR:	Pending response to GL3.3
Findings:	GL3.3 is now closed. This indicator is addressed in sections 6.4 of the PD and section 7.3 of the monitoring report. Population trends for 3 trigger species may be increasing in the project area, based on observations by game scouts. Some additional protection exists due to the presence of more game scouts, but the improvement of the range is assumed to be more important. Rhinos have been reintroduced in the project area, in a protected area in the Sera conservancy. This was not directly related to the project, but protection appears to be what is required to maintain a population of rhino. Item closed.
Date Closed:	29 May 2019

Validation/Verification Report Requirements For Public Comment Period

CCBA 30 Day Public Comment Period Dates:	Per the Verra project database, this project was open to public comments for its validation and first verification to the CCB Standards from 04 March - 03 April 2019.
Please describe all ways in which the 30 day comment period was publicized, especially in regard to local stakeholders. Supply copies (newspaper ads, emails, etc.) when possible.	During the first site visit it was found that there was general awareness of the project, but summaries of project documentation in local languages were not distributed in a timely fashion. The project was then reposted for public comment in 2019 and time-stamped, georeferenced photos were provided to the auditors to demonstrate the availability of the summaries was announced and provided at various locations in the project area.
How many comments were received?	Via CCBA Website:0 Via local stakeholder meetings/direct contacts: more than 130 interviews were conducted where general comments were received, largely positive in nature. Comments that required follow up are enumerated in the CCB findings
Supply copies of all comments submitted to the auditors, if any were received during the comment period.	No comments were received during the public comment period.
Respond to all comments appropriately, and show whether these comments caused modifications in some aspect of the project or PDD.	Again no public comments were received in the public comment period. As the detail of the comments received during the site visit is substantial, comments that required follow up are enumerated in the CCB findings

EJSMM/VO14090/CCB NCR Round 4.doc
K f 4/26/19

Appendix C: Documents From Client

Documents received 12 November 2014
- VCS ALM SGM Meth v3.3 Oct 2014.pdf
- Northern Kenya Carbon Project Summary.docx
- Ritchie 2014 PeerJ soil organic carbon Serengeti.pdf

Documents received 04 May 2015
- VCS ALM SGM Meth v3 27 APR MER track changes.docx
- VCS ALM SGM Meth v3 27 APR 2015 MER revised.docx

Documents received 20 May 2015
- VCS ALM SGM Meth v3 19 May 2015 MER revised.docx
- ESI SFF response to CARs May19 2015.docx

Documents received 25 May 2015
- NKCP VCS CCB Project Description v1.0 draft 4.docx

Documents received 27 May 2015
- NRTConservancySoilsStrata.kml
- NKCP Non-Permanence Risk Report Feb 2015.doc
- NKCP VCS CCB Project Description v1.0 draft 4.docx
- NRT Sampling Points.kml
- NRTConservancyBoundaries.kml

Documents received 30 July 2015
- NKCP VCS CCB Monitoring Impl Report - v5July 2015.pdf

Documents received 09 September 2015
- Project Net Removals.xlsx
- biodivesty survey birds.xlsx
- Bulk density raw data.xlsx
- historical_livestock_numbers_combined_20Nov2014.xlsx
- NKCP SNAP Monte Carlo simulation.xlsx
- NRT biodiversity survey May-June 2014 (Recovered).xlsx
- NRT carbon baseline sampling points updated.csv
- NRT grazing validation 2014.xlsx
- NRT plant species ligcell.xlsx
- NRT Remote sensing validation data July 2014.xlsx
- NRT summary soil data.xlsx

Documents received 11 September 2015
- TNC SU Grazing biodiversity report.docx
- 2013_Annual_Report_W-CoMMS_FINAL_1Sept2014.pdf
- NRT HH Livestock Survey Nov 2014.xlsx
- NRT HH Survey 2014 (Autosaved).xlsx

Documents received 16 September 2015
- ESI_visit_schedule_final MER.docx
- CCBA Project Description.pdf

- CCBA PIR -Sept 16 2015.pdf
- NRTConservancyStrataRevisedSept2015.kml

Documents received 17 September 2015
- NRTConservancyStrataRevisedSept2015.kml
- CCBA PD local language summary.docx
- CCBA PIR local language summary.docx
- NRT Settlements comma delimited.csv
- NRT Settlements Incomplete.kml

Documents received 18 September 2015
- CCBA Project Description.pdf
- CCBA PD local language summary.docx
- CCBA PIR local language summary.docx
- CCBA PIR -Sept 16 2015.pdf

Documents received 22 August 2016
- CCBA Project Description.pdf
- CCBA Cover page PDD.pdf
- CCBA Cover page PIR.pdf
- CCBA PD local language summary.pdf
- CCBA PIR -Aug 16 2016.pdf
- CCBA PIR local language summary.pdf

Documents received 08 February 2017
- NKCP Non-Permanence Risk Report Feb 2017.doc
- Fire history map for East Africa.pdf
- NKCP Final sample points.kml
- NRT carbon project Conservancy boundaries.kml
- NRT Core Areas.kml
- NRT Sera Buffer Zone.kml
- NRT Sera Core.kml
- NRTConservancyStrata2016.kmz
- NRT Carbon Proj anticipated cash flow.xlsx
- NKCP Business Plan.docx.doc

Documents received 14 February 2017
- Sampling site locations and soil characteristics.xlsx

Documents received 10 April 2017
- NRTConservancyStrataFinal2017.kml
- NKCP Baseline sampling points Final 2017.cpg
- NKCP Baseline sampling points Final 2017.dbf
- NKCP Baseline sampling points Final 2017.kml
- NKCP Baseline sampling points Final 2017.prj
- NKCP Baseline sampling points Final 2017.qpj
- NKCP Baseline sampling points Final 2017.shp
- NKCP Baseline sampling points Final 2017.shx
- NKCP Baseline soil data.xlsx
- NKCP Strata Polygons Final 2017.cpg

- NKCP Strata Polygons Final 2017.dbf
- NKCP Strata Polygons Final 2017.prj
- NKCP Strata Polygons Final 2017.qpj
- NKCP Strata Polygons Final 2017.shp
- NKCP Strata Polygons Final 2017.shx
- NRT carbon project Conservancy boundaries.kml
- NRT Conserv Boundaries UTM.cpg
- NRT Conserv Boundaries UTM.dbf
- NRT Conserv Boundaries UTM.prj
- NRT Conserv Boundaries UTM.qpj
- NRT Conserv Boundaries UTM.shp
- NRT Conserv Boundaries UTM.shx

Documents received 12 April 2017
- NKCP Baseline soil data Revised April 12 2017.xlsx

Documents received 21 April 2017
- Calculations
  - Public model v2 NRT calcs.xls
  - NDVI Trends 20022014.xlsx
  - NKCP methane calculations 2017.xlsx
  - NKCP SNAP Monte Carlo simulation.xlsx
  - NRT grazing expert method calibration.xlsx
  - NRT plant species ligcell.xlsx
  - NRT Soil Carbon Data and Removal Calculations.xlsx
- Financials
  - NRT Carbon Proj anticipated cash flow.xlsx
  - NKCP Business Plan.docx.doc
  - NKCP quick summary financials.xlsx
- GIS Files kml
  - NKCP Conservancy Boundaries Shape
    - NRT BND LAT LON.shx
    - NRT BND LAT LON.dbf
    - NRT BND LAT LON.prj
    - NRT BND LAT LON.sbn
    - NRT BND LAT LON.sbx
    - NRT BND LAT LON.shp
    - NRT BND LAT LON.shp.xml
  - NKCP sampling points Shape
    - NKCP Baseline sampling points Final 2017.shx
    - NKCP Baseline sampling points Final 2017.cpg
    - NKCP Baseline sampling points Final 2017.dbf
    - NKCP Baseline sampling points Final 2017.prj
    - NKCP Baseline sampling points Final 2017.qpj
    - NKCP Baseline sampling points Final 2017.shp
  - NKCP Strata Polygons Shape
    - NKCP Strata Polygons Final 2017.shx
    - NKCP Strata Polygons Final 2017.cpg
    - NKCP Strata Polygons Final 2017.dbf
    - NKCP Strata Polygons Final 2017.prj

- NKCP Strata Polygons Final 2017.qpj
- NKCP Strata Polygons Final 2017.shp
- NRT GrazHist2015
- NRT GrazHist2015\NRTGrazImpSeptOct2015.tif.aux.xml
- NRTGrazImpAprMay2015.tif
- NRTGrazImpAprMay2015.tif.aux.xml
- NRTGrazImpAugSept2015.tif.aux.xml
- NRTGrazImpFebMar2015.tif.aux.xml
- NRTGrazImpJanFeb2015.tif.aux.xml
- NRTGrazImpJulyAug2015.tif.aux.xml
- NRTGrazImpJunJuly2015.tif.aux.xml
- NRTGrazImpMarApr2015.tif.aux.xml
- NRTGrazImpMayJune2015.tif.aux.xml
- NRTGrazImpNovDec2015.tif.aux.xml
- NRTGrazImpOctNov.tif.aux.xml
- Conservancy Labels.kml
- NKCP Baseline sampling points Final 2017.kml
- NKCP Biodiversity Design.kml
- NKCP PDD settlement table.xlsx
- NRT Buffer Zones.kml
- NRT carbon project Conservancy boundaries.kml
- NRT Core Areas.kml
- NRT Sera Buffer Zone.kml
- NRT Sera Core.kml
- NRT Settlements comma delimited.csv
- NRT Settlements Incomplete.kml
- NRTConservancyStrataFinal2017.kml

• government and land rights

- KWS_ Conservancy Regulations-May (2).pdf
- Community Land Bill 2015_Post Mediation Committee_Aug 2016.pdf
- kla_land_use_in_kenya_case_for_policy.pdf

• Key Admin Documents

- NRT TNC Charter NKCP carbon project.docx
- Letters of Intent
- Westgate CCY0001.pdf
- Biliqo Bulesa CCY0001.pdf
- Ilngwesi CCY0001.pdf
- Kalama CCY0001.pdf
- Lekurruki0001.pdf
- Meibai CCY0001.pdf
- Melako CCY0001.pdf
- Mpus Kutuk CCY0001.pdf
- Naibunga CCY CARBON Letter0001.pdf
- Naibunga CCY0001.pdf
- Nakuprat Gotu CCY0001.pdf
- Namunyak CCY0001.pdf
- Nasuulu0001.pdf
- Sera CCY0001.pdf

• Main documents

- NKCP VCS CCB Project Description v2.0.pdf

- 090_SFTF_CCB_Rd1Findings_20151213 SFF response.docx
- 090_SFTF_VCS_Round1Findings_draft_20170210 SFF responses (Autosaved).xlsx
- NKCP Non-Permanence Risk Report Feb 2017.doc
- NKCP Non-Permanence Risk Report v 1.2 Apr 2017.pdf
- NKCP VCS CCB Project Description v2.0.docx

• Project Public Notices

- Westgate Notice 2 20151024_102902.jpg
- Kalama NoticeDSC08796.jpg
- Lekurruki NoticeIMG-20151019-WA0001.jpg
- Meibae Notice IMG-20151012-WA0000.jpg
- Melako NoticeIMG-20151013-WA0001.jpg
- Naibunga Notice IMG-20151015-WA0002.jpg
- Nakuprat Notice.jpeg
- Namunyak Notice IMG_20151014_112719.jpg
- Nasuulu Notice.jpg
- Sera Notice1444500740276 (1).jpg
- westgate notice 1 20151024_115940.jpg

Documents received 25 April 2017

- NRT Soil Carbon Data and Removal Calculations v2.xlsx
- Conservancy Basic Data.xlsx
- Leakage livestock numbers.xlsx
- NKCP Social Summary Data.xlsx
- NKCP VCS CCB Monitoring Impl Report - v2.0 April 25 2017.docx
- NKCP VCS CCB Monitoring Impl Report - v2.0 April 25 2017.pdf
- NKCP VCS CCB Project Description v2.0 draft 2 Apr 25.docx
- NKCP VCS CCB Project Description v2.0 draft 2 Apr 25.pdf

Documents received 01 September 2017

- CCBA Cover page PDD.pdf
- CCBA PD local language summary.pdf

Documents received 07 December 2017

- NRT_sample_codes.csv
- markSOCpred.csv
- markSOCpred_wetchem.csv
- markSpectraMIR.csv
- modPerf_PLS.jpg

Documents received 21 February 2018

- SFF Updated Response 090_SFTF_VCS_Round1Findings_final_20151207 2018 02 16.xlsx
- NKCP VCS CCB Monitoring Impl Report - v2.1 Feb 2018.pdf
- NKCP VCS CCB Project Description v2.1.pdf
- NRT Soil Carbon Data and Calculations v2.xlsx

Documents received on 05 March 2018

- NRT Soil Carbon Data and Removal Calculations v3.1.xlsx
- NKCP methane calculations 2017.xlsx
- NKCP VCS CCB Monitoring Impl Report - v2.1.2 March 5 2018.pdf

- NKCP VCS CCB Project Description v2.1.2.pdf

Documents received 03 July 2018
- Nothern Kenya Rangelands data.csv

Documents received 07 August 2018
- NRT Soil Carbon Data and Calculations v2pt2.xlsx
- ESI Bulk Densities March 2018 visit MER revision of SftF values used.xlsx

Documents received 06 September 2018 (from link in PD)
- HR-Policy-and-Procedures-Manual-November-2015-+(1).pdf

Documents received 05 March 2019
- Northern Kenya Carbon Project Documents
- __MACOSX
  - Public comment notices
    - community_comms
- public_commenting_notices
  - ._Backup of comments_and_community_feedback.docx
  - ._comments_and_community_feedback.docx
  - ._public_comment_tracker.xlsx
  - Social CoMMS
- CCB Documents
  - Conservancy Board meetings
    - BILIQO BOARD MEMBERS.docx
    - Il Ngwesi board members.docx
    - Kalama Board Members.docx
    - Lekurruki Board Members.docx
    - Meibae Board Members.docx
    - MELAKO BOARD MEMBERS.docx
    - Nakuprat-Gotu Board Members.docx
    - Nannapisho Board members.docx
    - NASUULU NEW BOARD MEMBERS.docx
    - Sera Board Members.docx
    - WEST GATE BOARD MEMBERS.docx
  - Conservancy legal documents
    - Carbon credit Ccy's Documents
- Carbon credit Ccy's Documents
  - Biliqo Bulesa
    - Biliqo Bulesa Ccy certificate of Incorporation.pdf
    - BILIQO BULESA PIN CERTIFICATE..pdf
  - Il ngwesi
  - Kalama
    - girgir group ranch. KRA cert.pdf
    - kalama certificate of Incorporation.pdf
  - Lekurruki
    - Lekurruki conservation ltd certificate.pdf
    - Lekurruki KRA pin.pdf
  - Leparua
    - LEPARUA CCY PIN CERTIFICATE.pdf

- Leparua Community Conservancy Certificate of Incorporation-4.pdf
- Meibae
- Meibae cert-3.pdf
- Meibae KRA pin.pdf
- Melako
- Melako Ccy certificate of Incorperation..pdf
- Melako pin cert.pdf
- Naibunga
- NAIBUNGA CCY, PIN CERTIFICATE. P051460924V.pdf
- Nakuprat -Gotu
- Nakuprat Scan Cert.docx
- NAKUPRAT-GOTU PIN CERTIFICATE.pdf
- Namunyak
- NAMUNYAK CO. LTD-1.pdf
- NWCL PIN Certificate..pdf
- Nasuulu
- NASUULU CCY CERTIFICATE OF INCORPORATION.docx
- Oldonyiro
-
- Sera
- sera ccy pin certificate..pdf
- sera certificate of incorporation.pdf
- West gate
- WESTGATE CCY CERTIFICATION OF INCORPORATION.pdf
- WESTGATE CCY KRA PIN CERTIFICATE..pdf
- Certificates of Incorporation
- Biliqo Bulesa COI 2013.pdf
- Biliqo Bulesa Tax PIN.pdf
- Kalama COI.pdf
- Kalama GR tax PIN.pdf
- Lekurruki COI.pdf
- Lekurruki Tax PIN.pdf
- Leparua COI.pdf
- Leparua Tax PIN.pdf
- Meibae COI.pdf
- Meibae Tax PIN.pdf
- Melako COI.pdf
- Melako Tax PIN.pdf
- Naibunga Tax PIN.pdf
- Nakuprat-Gotu COI.pdf
- Nakuprat-Gotu Tax PIN.pdf
- Namunyak COI.pdf
- Namunyak Tax PIN.pdf
- Nasuulu COI.pdf
- Sera COI.pdf
- Sera Tax PIN.pdf
- Westgate COI.pdf
- Westgate Tax PIN.pdf
- Managers forums and meetings
- Managers Forum Minutes..docx

- Managers Forum Minutes.pdf
- Managers Forum Minutes-October 2016.docx
- Managers Forum-W3.docx
- NRT HR document
- HR Policy and Procedures Manual November 2015 (1).pdf
- Peace document
- Technical Reporting Template_Annual Report (1) ELIJA.docx
- Public Notices
- Social CoMMS
- Document.docx
- Social Surveys
- Conservancy legal documents
- Biliqo-bulesa
- BILIQO BOARD MEMBERS.docx
- Biliqo Bulesa PIN certificate.xps
- Biliqo Bulesa CDMP revised_oct 2016.jpg
- Biliqo Bulesa Conservancy Management CD Plan_JKOct16.docx
- BILQO BULESA CONSERVANCY STRUCTURE.docx
- CERTIFICATION OF INCORPORATION.pdf
- Il-ngwesi
- Il ngwesi proposed dev. plan april 2016.pdf
- Kalama
- CERTIFICATE OF INCORPORATION.pdf
- Kalama CDMP 2016 map.jpg
- KALAMA COMMUNITY CONSERVANCY.docx
- Kalama Conservancy CD&M Plan-Draft May 2016.docx
- KRA PIN.pdf
- Management Structure.pdf
- Lekuruki
- KRA PIN.pdf
- Lekurruki CDMP 2016_revised Dom 14th oct .jpg
- Lekurruki Conservancy CDM Plan-JK Oct2016.docx
- Leparua
- BOARD OF DIRECTORS.docx
- KRA PIN CERTIFICATE.pdf
- MANAGEMENT STRUCTURE.docx
- Registration certificate.pdf
- Meibae
- incorporation certificate.pdf
- KRA PIN.pdf
- Melako
- ELECTED BOARD-1.docx
- Melako CDMP draft map edited 08 feb 2016.jpg
- Melako Conservancy CDM Plan April 2016_JK4Oct16.docx
- MELAKO CONSERVANCY MANAGEMENT STRUCTURE.docx
- Scan.pdf
- Mpus-kutuk
- Oldonyiro conservancy CDMP2016.jpg
- Naibunga
- certificate of incorporation.pdf

- KRA PIN CERTIFICATE.pdf
- LIST OF DIRECTORS.docx
- Naibunga CDMP 2016 Revised august.jpg
- Naibung'a Conservancy Draft CD&MP June 2016.docx
- Nakuprat-Gotu
- ConservancyManagementPlan_NakuprattGotu_A5_FinalDraft_Jan2015.pdf
- incorporation certificate.pdf
- LIST OF BOARD MEMBERS 2016- NAKUPRAT GOTU.docx
- management plan.pdf
- Nakuprat- Gotu PIN Certificate.pdf
- Nakupurat Gotu hres jan 2015_ A4_tourism.jpg
- Namunyak
- Board Names 2015 -2018.doc
- NAMUNYAK CO. LTD.pdf
- Namunyak conservancy PIN cert.pdf
- Namunyak map.pdf
- NWCT Structure.doc
- Nasuulu
- BOARD OF DIRECTORS.docx
- MANAGEMENT PLAN.docx
- MANAGEMENT STRUCTURE.docx
- Nasuulu CD-MP_a4.jpg
- REGISTRATION CERTIFICATE.docx
- Sera
- CERTIFICATE OF INCORPORATION.pdf
- KRA PIN.pdf
- Sera CD_MP map5thjune 2015.jpg
- Westgate
- CERTIFICATION OF INCORPORATION.pdf
- KRA PIN.pdf
- West Gate Conservancy CD&MP Draft June 2016.doc
- Westgate CDMP maprevised november08 _2016.jpg
- WESTGATE Names of Directors 2016 (Autosaved).docx

• Conservancy Management Plans
- Community docs
- Carbon Project Conservancy Actions 2017-2018.docx
- Conservancy-Management-Plan_KALAMA_FINAL_LowRes.pdf
- ConservancyManagementPlan_NakuprattGotu_A5_FinalDraft_Jan2015.pdf
- Conservancy management plans
- BILIQO BULESA COMMUNITY CONSERVANCY LTD.docx
- Conservancy-Management-Plan_BILIQO BELESA.pdf
- ConservancyManagementPlan_LEKURRUKI_Spread.pdf
- ConservancyManagementPlan_MELAKO_v2.pdf
- Conservancy-Management-Plan_NAIBUNGA_LowRes.pdf
- ConservancyManagementPlan_Sera_October2015.pdf
- Conservancy-Management-Plan_WEST GATE.pdf
- Naibunga CCY CARBON Letter0001.pdf
- Nakpurat Gotu ACTION PLAN Range land.docx
- NGILAI___RANGELAND_SEPT_REPORT_2017O926 (1).pdf

• Letters of Intent

- Biliqo Bulesa CCY0001.pdf
- carbon updates updated.xlsx
- Ilngwesi CCY0001.pdf
- Kalama CCY0001.pdf
- Lekurruki0001.pdf
- Meibai CCY0001.pdf
- Melako CCY0001.pdf
- Mpus Kutuk CCY0001.pdf
- Naibunga CCY0001.pdf
- Nakuprat Gotu CCY0001.pdf
- Namunyak CCY0001.pdf
- Nasuulu0001.pdf
- Sera CCY0001.pdf
- Westgate CCY0001.pdf
- livestock movement maps
- 2014
  - Biliqo bulesa
    - 2014(Jan,Feb,April-Dec).pdf
    - 2014.11.jpg
    - Biliqo nov 2014.jpg
  - Ilgwesi
    - 2014(June& July).pdf
    - 2014.06.il ngwesi0001.jpg
    - 2014.07.il ngwesi0001.jpg
    - 2014.8.Ilgwesi.jpg
    - 2015.1.il ngwesi0001.jpg
    - 2015.3.il ngwesi0001.jpg
    - 2015.4.il ngwesi0001.jpg
  - Kalama
    - 2014(Jan-Dec).pdf
    - 2014.01.kalama0001.jpg
    - 2014.02.kalama0001.jpg
    - 2014.03.kalama0001.jpg
    - 2014.04.kalama0001.jpg
    - 2014.05.kalama0001.jpg
    - 2014.06.kalama0001.jpg
    - 2014.07.kalama0001.jpg
    - 2014.08.kalama0001.jpg
    - 2014.9.Kalama.jpg
    - 2014.10.Kalama.jpg
    - 2014.11.Kalama.jpg
    - 2014.12.Kalama.jpg
    - scan0010.jpg
    - scan0012.jpg
  - Lekurukki
    - 2014
      - 2014.01.lekurruki0001.jpg
      - 2014.03.lekurruki0001.jpg
      - 2014.04.lekurruki0001.jpg
      - 2014.06.lekurruki0001.jpg

- 2014.07.lekurruki0001.jpg
- 2014.08.lekurruki0001.jpg
- 2014.09.lekurruki0001.jpg
- 2014.10.lekurruki0001.jpg
- 2014.11.lekurruki0001.jpg
- 2014.12.lekurruki0001.jpg
- 2014.01.lekurruki0001.jpg
- 2014.02.jpg
- 2014.03.lekurruki0001.jpg
- 2014.04.lekurruki0001.jpg
- 2014.05.lekurruki0001.jpg
- 2014.06.lekurruki0001.jpg
- 2014.07.lekurruki0001.jpg
- 2014.08.lekurruki0001.jpg
- 2014.09.lekurruki0001.jpg
- 2014.10,Lekurruki.jpg
- 2014.11.Lekurruki.jpg
- 2014.12.Lekurruki.jpg
- APRIL14.jpg
- DEC14.jpg
- JAN2014.jpg
- JUNE14.jpg
- MARCH14.jpg
- May14.jpg

- Leparua
  - 2014
    - 2014.01.leparua0001.jpg
    - 2014.02.leparua0001.jpg
    - 2014.03.leparua0001.jpg
    - 2014.04.leparua0001.jpg
    - 2014.05.leparua0001.jpg
    - 2014.06.leparua0001.jpg
    - 2014.07.leparua0001.jpg
    - 2014.08.leparua0001.jpg
- Meibae
- Melako
  - 2014(Aug-Dec).pdf
- Mpus kutuk
  - 2014.02.jpg
  - 2014.4.mpus kutuk0001.jpg
  - 2014.5.mpus kutuk0001.jpg
  - 2014.6.mpus kutuk0001.jpg
  - 2014.7.mpus kutuk0001.jpg
  - 2014.8.mpus kutuk0001.jpg
  - 2014.9.Mpus Kutuk.jpg
  - 2014.10.Mpus Kutuk.jpg
  - 2014.11.Mpus Kutuk.jpg
  - 2014.12.Mpus Kutuk.jpg
- Naibunga
  - 2014.01.naibunga0001.jpg

- 2014.02.naibunga0001.jpg
- 2014.03.naibunga0001.jpg
- 2014.04.naibunga0001.jpg
- 2014.05.naibunga0001.jpg
- 2014.06.naibunga0001.jpg
- 2014.07.naibunga0001.jpg
- 2014.08.nabunga0001.jpg
- Naibunga.pdf

 Nakuprat Gotu

 Namunyak

- 2014.01.namunyak0001.jpg
- 2014.02.namunyak0001.jpg
- 2014.03.namunyak0001.jpg
- 2014.04.namunyak0001.jpg
- 2014.05.namaunyak0001.jpg
- 2014.06.namunyak0001.jpg
- 2014.07.namunyak0001.jpg
- 2014.08.namunyak0001.jpg
- 2014.09.jpg
- 2014.10.jpg
- 2014.12.Namunyak.jpg
- 2015.01.nwct ngilai0001.jpg
- 2015.02.nwct ngilai0001.jpg
- 2015.03.nwct ngilai0001.jpg
- 2015.04.nwct ngilai0001.jpg

 Nasuulu

- 2014.01.jpg
- 2014.02.jpg
- 2014.03.jpg
- 2014.04.jpg
- 2014.05.jpg
- 2014.06.jpg
- 2014.07.jpg
- 2014.08.jpg
- 2014.09.jpg
- 2014.10.jpg
- 2014.11.jpg
- 2014.12.jpg

 Sera

- scan0022.jpg
- scan0023.jpg
- scan0024.jpg
- scan0025.jpg
- scan0026.jpg
- scan0027.jpg

 Westgate

- 2014.9.Westgate.jpg
- 2014.10.Westgate.jpg
- 2014.11.Westgate.jpg
- scan0001.jpg

- scan0002.jpg
- scan0004.jpg
- scan0006.jpg
- scan0007.jpg
- scan0008.jpg
- scan0009.jpg
- Westgate.April.2014.jpg
- Westgate.Aug.2014.jpg
- westgate.Dec 2014.jpg
- Westgate.Feb.2014.jpg
- Westgate.Jan..2014.jpg
- Westgate.July.2014.jpg
- Westgate.June.2014.jpg
- Westgate.March.2014.jpg
- Westgate.May.2014.jpg
- Westgate.Nov.2014.jpg
- Westgate.Oct.2014.jpg
- Westgate.Sep.2014.jpg

o 2015

 Biliqo bulesa

- 2015 .05.jpg
- 2015 April.pdf
- 2015(march,June,Sept,Nov,Dec).pdf
- 2015.01.biliqo0001.jpg
- 2015.02.biliqo0001.jpg
- 2015.04.jpg
- 2015.05.jpg
- 2015.07.jpg
- 2015.08.jpg
- 2015.09.jpg
- 2015.10.jpg
- 2015.11.jpg

 Ilgwesi

- 2015 .01.jpg
- 2015. 03.jpg
- 2015.1.il ngwesi0001.jpg
- 2015.02.jpg
- 2015.2.il ngwesi0001.jpg
- 2015.3.il ngwesi0001.jpg
- 2015.04.jpg
- 2015.4.il ngwesi0001.jpg
- IL Ngwesi Dec 2015-April 2016.pdf

 Kalama

- 2015(Jan-Dec).pdf
- 2015.1.Kalama0001.jpg
- 2015.1.Kalama0002.jpg
- 2015.1.Kalama0003.jpg
- 2015.4.Kalama.jpg
- scan0018.jpg
- scan0023.jpg

- scan0024.jpg
- scan0025.jpg
- scan0026.jpg
- scan0027.jpg
- scan0028.jpg
- scan0029.jpg

 Lekurruki
- 2015 April.jpg
- 2015 Feb.jpg
- 2015 may.jpg
- 2015.03.jpg
- 2015_4_lekurruki0001.jpg
- 2016 FEB.jpg
- 2016 Jan.jpg
- APRIL15.jpg
- FEB15.jpg
- JAN15.jpg
- June 2015.jpg
- JUNE15.jpg
- Lekurruki-Dec 2015.pdf
- Lekurruki-Nov 2015.pdf
- Lekurruki-Oct 2015.pdf
- MARCH15.jpg
- MAY15.jpg

 Leparua
- Leparua-sept 2015.pdf

 Meibae
- 2015.1.meibae0001.jpg
- 2015.02.Meibae.jpg
- 2015.3.meibae0001.jpg
- 2015.04.meibae.jpg

 Melako
- 2015.01.jpg
- 2015.02.jpg
- 2015.03.jpg
- 2015.04.jpg

 Mpus kutuk
- 2015.01.mpus kutuk0001.jpg
- 2015.02.mpus kutuk0001.jpg
- 2015.03.mpus kutuk0001.jpg
- 2015.04.mpus kutuk0001.jpg
- 2015.11.jpg
- 2015.12.jpg

 Naibunga
- 2015 April.jpg
- 2015.1.Naibunga.jpg
- 2015.2.Naibunga (2).jpg
- 2015.3.Naibunga.jpg

 Nakuprat Gotu
- 2015(Jan-June).pdf

- Namunyak
  - 2015.01.nwct ngilai0001.jpg
  - 2015.1.Namunyak.jpg
  - 2015.1.namunyak0001.jpg
  - 2015.1.namunyak0002.jpg
  - 2015.1.namunyak0003.jpg
  - 2015.1.namunyak0005.jpg
  - 2015.02.nwct ngilai0001.jpg
  - 2015.03.nwct ngilai0001.jpg
  - 2015.04.nwct ngilai0001.jpg
  - 2015.4.Namunyak.jpg
  - 2015.5.Namunyak.jpg
- Nasuulu
  - 2015.01.jpg
  - 2015.02.jpg
  - 2015.03.jpg
  - 2015.04.jpg
  - 2015.05.jpg
  - 2015.06.jpg
  - 2015.07.jpg
  - 2015.08.jpg
  - 2015.09.jpg
  - 2015.10.jpg
  - 2015.11.jpg
  - 2015.12.jpg
- Sera
  - dec.jpg
  - scan0028.jpg
  - scan0029.jpg
  - scan0030.jpg
  - scan0031.jpg
  - scan0032.jpg
  - scan0033.jpg
  - scan0034.jpg
  - SERA.pdf
- Westgate
  - 2015.01.Westgate.jpg
  - 2015.02.Westgate.jpg
  - 2015.2.West.jpg
  - WESTGATE.pdf

o 2016

- Biliqo Bulesa
  - 2016.01.jpg
  - 2016.02.jpg
  - 2016.04.jpg
  - 2016.05.jpg
  - 2016.06.jpg
  - 2016.07.jpg
  - 2016.08.jpg
  - 2016.09.jpg

- 2016.10.jpg
- 2016.11.jpg
- 2016.12.jpg

 Ilngwesi
- IL Ngwesi-Feb 2017.pdf

 Kalama
- 2016 .03.jpg
- 2016.01.jpg
- 2016.02.jpg
- Kalama-Aug 2016.pdf
- Kalama-Dec 2016.pdf
- Kalama-Jan 2016.pdf
- Kalama-July 2016.pdf
- Kalama-June 2016.pdf
- Kalama-May 2016.pdf
- Kalama-Nov 2016.pdf
- Kalama-Oct 2016.pdf

 Lekurruki
- 2016 April.jpg
- 2016 Feb.jpg
- 2016 Jan.jpg
- 2016 March.jpg
- Lekurruki-Dec 2016.pdf

 Leparua
- Leparua-Dec 2016.pdf

 Meibae
- April.jpg
- August.jpg
- July.jpg
- June.jpg
- May.jpg
- November.jpg
- October.jpg
- September.jpg

 Melako

 Mpus Kutuk
- 2016.01.jpg
- 2016.02.jpg
- 2016.03.jpg
- 2016.04.jpg
- 2016.05.jpg
- 2016.06.jpg
- 2016.07.jpg
- 2016.08.jpg
- 2016.09.jpg
- 2016.10.jpg
- 2016.11.jpg
- 2016.12.jpg

 Naibunga

 Nakuprat Gotu

- 2016.01.jpg
- 2016.02.jpg
- 2016.03.jpg
- 2016.04.jpg
- 2016.05.jpg
- 2016.06.jpg
- 2016.07.jpg
- 2016.08.jpg
- 2016.09.jpg
- 2016.10.jpg
- 2016.11.jpg

 Namunyak
- Ngilai
  - august 2016.jpg
  - Jul 2016.jpg
  - Jun 2016.jpg
  - May 2016.jpg
  - Ngilai Unit-Aug.pdf
  - Ngilai Unit-July.pdf
  - Ngilai Unit-June.pdf
  - Ngilai Unit-May.pdf
  - Ngilai Unit-Nov.pdf
  - Ngilai Unit-Oct.pdf
  - Ngilai Unit-Sept.pdf
  - Nov 2016.jpg
  - Oct 2016.jpg
  - Sept 2016.jpg
- Dec 2016.pdf
- Feb-Nov 2016.pdf
- Jan 2016.pdf
- Namunyak-April 2016.pdf
- Namunyak-Aug 2016.pdf
- Namunyak-Dec 2016.pdf
- Namunyak-Feb 2016.pdf
- Namunyak-Jan 2016.pdf
- Namunyak-July 2016.pdf
- Namunyak-June 2016.pdf
- Namunyak-March 2016.pdf
- Namunyak-May 2016.pdf
- Namunyak-Nov 2016.pdf
- Namunyak-Oct 2016.pdf
- Namunyak-Sept 2016.pdf

 Nasuulu
- 2016.01.jpg
- 2016.02.jpg
- 2016.03.jpg
- 2016.04.jpg
- 2016.05.jpg
- 2016.06.jpg
- 2016.07.jpg

- 2016.08.jpg
- 2016.09.jpg
- 2016.10.jpg
- 2016.11.jpg
- 2016.12.jpg

- Sera
- Feb 2016.jpg
- Jan 2016.jpg
- Jan-Dec 2016.pdf
- March 2016.jpg
- Sera-April 2016.pdf
- Sera-Aug 2016.pdf
- Sera-Feb 2016.pdf
- Sera-Jan 2016.pdf
- Sera-July 2016.pdf
- Sera-June 2016.pdf
- Sera-March 2016.pdf
- Sera-May 2016.pdf
- Sera-Nov 2016.pdf
- Sera-Oct 2016.pdf
- Sera-Sept 2016.pdf

- Westgate
- April 2016.jpg
- Aug 2016.jpg
- Dec 2016.jpg
- Feb 2016.pdf
- January 2016.pdf
- July 2016.jpg
- June 2016.jpg
- March 2016.jpg
- May 2016.jpg
- Nov 2016.jpg
- Oct 2016.jpg
- Sept 2016.jpg

o 2017

- Biliqo Bulesa
- 10.2017.jpg
- 11.2017.jpg
- 12.2017.jpg
- 2017.01.jpg
- 2017.02.jpg
- 2017.03.jpg
- 2017.04.jpg
- 2017.05.jpg
- 2017.06.jpg
- 2017.07.jpg
- 2017.08.jpg
- 2017.09.jpg

- Ilngwesi
- 10.2017.jpg

- 11.2017.jpg
- 12.2017.jpg
- IL Gwesi 2016 Dec-2017 Jan.pdf
- IL Ngwesi March 2017.pdf
- IL Ngwesi-Feb 2017.pdf
- Ilgwesi-june 2017.tif
- Ilgwesi-Sept 2017.tif

 Kalama

- 11.2017.jpg
- 12.2017.jpg
- April-Oct.pdf
- Kalama-Feb 2017.pdf
- Kalama-Jan 2017.pdf
- Kalama-March 2017.pdf

 Lekurruki

- 01.2017.pdf
- 02.2017.pdf
- 03.2017.pdf
- 04.2017.jpg
- 05.2017.jpg
- 06.2017.jpg
- 07.2017.jpg
- 08.2017.jpg
- 09.2017.jpg
- 10.2017.jpg
- 11.2017.jpg
- 12.2017.jpg

 Leparua

- 11.2017.jpg
- 12.2017.jpg
- 2017.01.jpg
- 2017.02.jpg
- 2017.04.jpg
- 2017.05.jpg
- 2017.07.jpg
- 2017.08.jpg
- 2017.09.jpg

 Meibae

- 01.2017.jpg
- 02.2017.jpg
- 03.2017.jpg
- 04.2017.jpg
- 05.2017.jpg
- 06.2017.jpg
- 07.2017.jpg
- 08.2017.jpg
- 09.2017.jpg
- 10.2017.jpg
- 11.2017.jpg
- 12.2017.jpg

- Melako
  - 10.2017.pdf
  - 11.2017.tif
  - 12.2017.tif
  - 2017.09.jpg
  - MELAKO GRAZING BLOCKS.pdf
  - Melako May 2017.tif
  - MELAKO.pdf
  - Melako-April 2017.tif
  - Melako-Aug 2017.tif
  - Melako-Jan-March 2017.tif
  - Melako-July 2017.tif
  - Melako-June 2017.tif
- Mpus Kutuk
  - 10.2017.jpg
  - 11.2017.jpg
  - 12.2017.jpg
  - 2017.01.jpg
  - 2017.02.jpg
  - 2017.03.jpg
  - 2017.04.jpg
  - 2017.05.jpg
  - 2017.06.jpg
  - 2017.07.jpg
  - 2017.08.jpg
  - 2017.09.jpg
- Naibunga
  - 01.2017.jpg
  - 02.2017.jpg
  - 03.2017.jpg
  - 04.2018.jpg
  - 05.2017.jpg
  - 06.2017.jpg
  - 07.2017.jpg
  - 08.2017.jpg
  - 09.2017.jpg
  - 10.2017.jpg
  - 11.2017.jpg
  - 12.2017.jpg
- Nakuprat Gotu
  - 10.2017.pdf
  - 11.2017.pdf
  - 12.2017.pdf
  - 2017.01.jpg
  - 2017.02.jpg
  - 2017.03.jpg
  - 2017.04.jpg
  - 2017.05.jpg
  - 2017.06.jpg
  - 2017.07.jpg

- 2017.08.jpg
- 2017.09.jpg
- Nakurpat-Gotu feb 2017-livestock movement map (1).tif
- Namunyak
- Ngilai
  - Ngilai-Aug and Sept 017.tif
  - Ngilai-Dec 017.tif
  - Ngilai-July 017.tif
- 12.2017.pdf
- april-Sept.pdf
- Nasuulu
- 10.2017-01.2018.pdf
- 2017.01.jpg
- 2017.02.jpg
- 2017.03.jpg
- 2017.04.jpg
- 2017.05.jpg
- 2017.06.jpg
- 2017.07.jpg
- 2017.08.jpg
- 2017.09.jpg
- Sera
- 01.2017.pdf
- 02.2017.pdf
- 03.2017.pdf
- 04.2017.pdf
- 05.2017.jpg
- 06.2017.jpg
- 07.2017.jpg
- 08.2017.jpg
- 09.2017.jpg
- 10.2017.jpg
- 11.2017.jpg
- 12.2017.jpg
- Westgate
- 10.2017.jpg
- 11.2017.jpg
- 12.2017.jpg
- April 2017.pdf
- Feb 2017.jpg
- Jan 2017.jpg
- March 2017.jpg
- may-sept 2017.pdf
  - 2018
- Biliqo Bulesa
- 01.2018.jpg
- 02.2018.jpg
- 03.2018.jpg
- 04.2018.jpg
- 05.2018.jpg

- 06.2018.jpg
- 11.2018.jpg
- 12.2018.jpg
- 2018.07.jpg
- 2018.08.jpg
- 2018.09.jpg
- 2018.10.jpg

 Ilngwesi

- 01.2018.jpg
- 02.2018.jpg
- 03.2018.jpg
- 04.2018.jpg
- 06.2018.jpg
- 07.2018.jpg
- 09.2018.jpg
- 10.2018.jpg
- 11.2018.jpg
- 12.2018.jpg

 Kalama

- 01.2018.jpg
- 02.2018.jpg
- 03.2018.jpg
- 04.2018.jpg
- 05.2018.jpg
- 06.2018.jpg
- 07.2018.jpg
- 08.2018.jpg
- 09.2018.jpg
- 10.2018.jpg
- 12.2018.jpg

 Lekurruki

- 01.2018.jpg
- 02.2018.jpg
- 03.2018.jpg
- 04.2018.jpg
- 05.2018.jpg
- 06.2018.jpg
- 08.2018.jpg
- 09.2018.jpg
- 10.2018.jpg
- 11.2018.jpg

 Leparua

- 01.2018.jpg
- 02.2018.jpg
- 03.2018.jpg
- 04.2018.jpg
- 05.2018.jpg
- 06.2018.jpg
- 07.2018.jpg
- 08.2018.jpg

- 09.2018.jpg
- 10.2018.jpg
- 11.2018.JPG
- 12.2018.JPG

 Meibae

- 01.2018.jpg
- 02.2018.jpg
- 03.2018.jpg
- 04.2018.jpg
- 05.2018.jpeg
- 06.2018.jpg
- 07.2018.jpg
- 08.2018.jpg
- 09.2018.jpg
- 10.2018.jpg
- 11.2018.jpg
- 12.2018.jpg

 Melako

- 01.2018.pdf
- 02.2018.pdf
- 03.2018.pdf
- 04.2018.pdf
- 05.2018.pdf
- 06.2018.pdf
- 07.2018.pdf
- 08.2018.pdf
- 09.2018.pdf
- 10.2018.pdf

 Mpus Kutuk

- 01.2018.jpg
- 02.2018.jpg
- 03.2018.jpg
- 04.2018.jpg
- 05.2018.jpg
- 06.2018.jpg
- 07.2018.jpg
- 08.2018.jpg
- 09.2018.jpg
- 10.2018.jpg
- 11.2018.jpg
- 12.2018.jpg

 Naibunga

- 01.2018.jpg
- 02.2018.jpg
- 03.2018.tif
- 04.2018.tif
- 05.2018.tif
- 06.2018.tif
- 08.2018.jpg
- 09.2018.jpg

- 10.2018.jpg
- July 2018.jpg

- Nakuprat Gotu
- 01.2018.pdf
- 02.2018.pdf
- 03.2018.pdf
- 04.2018.pdf
- 05.2018.pdf
- 06.2018.pdf
- 07.2018.pdf
- 08.2018.pdf
- 09.2018.pdf
- 10.2018.pdf
- 11.2018.pdf

- Namnyak-Kalepo
- 07.2018.jpg
- 08.2018.jpg
- 09.2018.jpg
- 10.2018.jpg
- 11.2018.jpg
- 12.2018.jpg

- namunyak-nalowon
- 11.2018_12.2018.pdf

- Namunyak-Ngilai
- 01.2018.pdf
- 02.2018.pdf
- 03.2018.pdf
- 04.2018.pdf
- 08.2018.jpg
- 11.2018.jpg
- 12.2018.jpg
- 2018.05.pdf
- 2018.06.pdf
- 2018.07.pdf
- 2018.09.pdf
- 2018.10.pdf
- map05 2018.pdf
- map06 2018.pdf
- map07 2018.pdf
- map09 2018.pdf
- Ngilai-April 018.tif
- Ngilai-Feb 018.tif
- Ngilai-Jan 018.tif
- Ngilai-March 018.tif

- Nasuulu
- 02.2018.pdf
- 03.2018.pdf
- 10.2017-01.2018.pdf
- 11.2018.pdf
- 12.2018.pdf

- 2018.04.pdf
- 2018.05.pdf
- 2018.06.pdf
- 2018.07.pdf
- 2018.08.pdf
- 2018.09.jpg
- 2018.10.pdf

- Sera
  - 01.2018.jpg
  - 02.2018.jpg
  - 03.2018.jpg
  - 04.2018.jpg
  - 05.2018.jpg
  - 06.2018.jpg
  - 07.2018.jpg
  - 08.2018.jpg
  - 09.2018.jpg
  - 10.2018.jpg
- Westgate
  - 01.2018.jpg
  - 02.2018.jpg
  - 03.2108.jpg
  - 04.2018.jpg
  - 05.2018.jpg
  - 06.2018.jpg
  - 07.2018.jpg
  - 08.2018.jpg
  - 09.2018.jpg
  - 10.2018.jpg

o 2019

- Biliqo Bulesa
  - 01.2019.jpg
- Ilngwesi
- Kalama
  - 01.2019.jpg
  - 02.2019.jpg
- Lekurruki
- Leparua
  - 01.2019.JPG
- Meibae
  - 01.2019.jpg
- Melako
- Mpus Kutuk
  - Jan 2019.jpg
- Naibunga
- Nakuprat Gotu
- Namunyak -Kalepo
- Namunyak-Nalowon
- Namunyak-Ngilai
- Nasuulu

- 01.2019.jpg
  - Sera
  - Westgate
- empty maps
  - biliqo bulesa Grazing bLocks 2014 (1).jpg
  - Ilngwesi Grazing blocks.jpg
  - Ishaqbini.bmp
  - Jaldesa grazing blocks.jpg
  - Kalama CDMP 2017Edited.jpg
  - Kalama Grazing Blocks 2014.jpg
  - Lekurruki Grazing Blocks 2014.jpg
  - Lekurruki Grazing blocks.jpg
  - Leparua Grazing blocks.jpg
  - Meibae Grazing Blocks (1).jpg
  - Meibae Grazing Blocks final.jpg
  - Meibae Grazing Blocks.jpg
  - Meibae Grazing BlocksF.jpg
  - Melako Grazing bLocks 2014.jpg
  - Melako Grazing Blocks.jpg
  - Mpus Kutuk Grazing Blocks 2014.jpg
  - NAAPU_UNIT (1).jpg
  - Naibunga Grazing Blocks 2014.jpg
  - Naibunga Grazing blocks.jpg
  - namunyak Grazing bLocks 2014.jpg
  - NANAPISHO_UNIT.jpg
  - Nasuulu CD-MP_a4.jpg
  - Nasuulu Grazing blocks1.jpg
  - Sera Grazing bLocks 2014 (1).jpg
  - Sera Grazing blocks.jpg
  - Songa Grazing Block.jpg
  - Westgate Grazing blocks (1).jpg
  - Westgate Grazing blocks.jpg
- livestock movement maps
  - livestock_movement_maps_summary_2014-2015.xlsx
- NRT polygons
- NRTConservancyStrataFinal2017.kml
- NRTConservancyStrataFinal2017-Area.xls
- NRTConservancyStrataFinal2017-Area.xlsx
- NRTConservancyStrataFinal2017-ProjectZone.cpg
- NRTConservancyStrataFinal2017-ProjectZone.dbf
- NRTConservancyStrataFinal2017-ProjectZone.kml
- NRTConservancyStrataFinal2017-ProjectZone.prj
- NRTConservancyStrataFinal2017-ProjectZone.sbn
- NRTConservancyStrataFinal2017-ProjectZone.sbx
- NRTConservancyStrataFinal2017-ProjectZone.shp
- NRTConservancyStrataFinal2017-ProjectZone.shx
- NRTConservancyStrataFinal2017-Soka.dbf
- NRTConservancyStrataFinal2017-Soka.kml
- NRTConservancyStrataFinal2017-Soka.prj
- NRTConservancyStrataFinal2017-Soka.sbn

- NRTConservancyStrataFinal2017-Soka.sbx
- NRTConservancyStrataFinal2017-Soka.shp
- NRTConservancyStrataFinal2017-Soka.shx
- NRT-ProjectZone.kml
- TotalArea_ProjectZone.xlsx
- Public Announcement Photos
  - Archers post
    - DSCN1430.JPG
    - DSCN1431.JPG
    - DSCN1432.JPG
  - ilngwesi HQ
    - DSCN1325.JPG
    - DSCN1326.JPG
    - DSCN1327.JPG
  - isiolo town
    - DSCN1442.JPG
    - DSCN1443.JPG
    - DSCN1444.JPG
    - DSCN1445.JPG
  - kalama HQ
    - DSCN1408.JPG
    - DSCN1409.JPG
    - DSCN1410.JPG
  - lekurruki HQ
    - DSCN1329.JPG
    - DSCN1330.JPG
    - DSCN1331.JPG
  - leparua HQ
    - DSCN1320.JPG
    - DSCN1321.JPG
    - DSCN1322.JPG
    - DSCN1323.JPG
  - Lerata
    - DSCN1401.JPG
    - DSCN1402.JPG
    - DSCN1403.JPG
    - DSCN1404.JPG
  - lerata 2
    - DSCN1405.JPG
    - DSCN1406.JPG
    - DSCN1407.JPG
  - meibae HQ
    - DSCN1348.JPG
    - DSCN1349.JPG
    - DSCN1350.JPG
    - DSCN1351.JPG
  - melako HQ
    - DSCN1389.JPG
    - DSCN1390.JPG
    - DSCN1391.JPG

- Merile centre
  - DSCN1392.JPG
  - DSCN1393.JPG
  - DSCN1394.JPG
  - DSCN1395.JPG
- mpus kutuk
  - DSCN1346.JPG
  - DSCN1347.JPG
- nakupurat HQ
  - DSCN1435.JPG
  - DSCN1436.JPG
- Namunya HQ
  - DSCN1357.JPG
  - DSCN1358.JPG
- Nasuulu HQ
  - DSCN1333.JPG
  - DSCN1334.JPG
  - DSCN1335.JPG
- Nasuulu loruko centre
  - DSCN1336.JPG
  - DSCN1337.JPG
  - DSCN1338.JPG
  - DSCN1339.JPG
- Ngare mara
  - DSCN1437.JPG
  - DSCN1438.JPG
  - DSCN1439.JPG
  - DSCN1440.JPG
  - DSCN1441.JPG
- Reteti elephant sanctuary
  - DSCN1359.JPG
  - DSCN1360.JPG
  - DSCN1361.JPG
- sera HQ
  - DSCN1397.JPG
  - DSCN1398.JPG
  - DSCN1399.JPG
  - DSCN1400.JPG
- Sereolipi
  - DSCN1385.JPG
  - DSCN1386.JPG
  - DSCN1387.JPG
  - DSCN1388.JPG
- Wamba namunayak west
  - DSCN1355.JPG
  - DSCN1356.JPG
- westgate HQ
  - DSCN1340.JPG
  - DSCN1341.JPG
  - DSCN1342.JPG

- Westgate ngutuk ongiron
  - DSCN1342.JPG
  - DSCN1343.JPG
  - DSCN1344.JPG
  - DSCN1345.JPG
- DSCN1328.JPG
- GPS LOCATIONS FOR DOCUMENTS POSTED. - Shortcut

• Public comment notices
- community_comms
  - public_commenting_notices

• biliqo_bulesa
- IMG-20151019-WA0003.jpg
- IMG-20151019-WA0004.jpg

• Kalama
- DSC08796.JPG

• Lekurruki
- IMG-20151019-WA0000.jpg
- IMG-20151019-WA0001.jpg
- IMG-20151019-WA0002.jpg

• Meibae
- DSC05160.JPG
- DSC05164.JPG
- DSC05166.JPG
- Grazing committee meeting held at conservancy HQ on 15.docx
- IMG-20151012-WA0000.jpg

• Melako
- carbon_awareness_minutes
  - Merille meeting.docx
  - MINUTES OF LONTOLIO ZONE MEETING HELD ON 19TH October 2015 AT LONTOLIO CENTRE.docx
  - MINUTES OF THE LAISAMIS MEETING HELD AT NAPANU NGAI CAMPSITE ON 21ST OCTOBER 2015 AT 10.docx
- IMG-20151013-WA0000.jpg
- IMG-20151013-WA0001.jpg
- IMG-20151013-WA0002.jpg

• mpus_kutuk
- Doc 3.docx

• Naibunga
- IMG-20151015-WA0000.jpg
- IMG-20151015-WA0001.jpg
- IMG-20151015-WA0002.jpg

• nakuprat_gotu
- File Oct 24, 14 59 21.jpeg

• Namunyak
- IMG_20151014_112719.jpg
- IMG_20151022_121823.jpg
- IMG-20151024-WA0000.jpg

• Nasuulu
- RC=NASUULU.JPG
- RC-NASUULU 1.JPG

- RC-NASUULU 2.JPG
- RC-NASUULU 3.JPG
- RC-NASUULU 4.JPG
- RCNASUULU.JPG
- RC-NASUULU.JPG
- RC-NASUULU_1.JPG
- RC-NASUUULU-04.JPG

• Sera
- 1444500740025.jpg
- 1444500740276.jpg
- 1444500740538.jpg
- 1444500740808.jpg
- 1444500740998.jpg

• Westagte
- 20151024_102902.jpg
- 20151024_115940.jpg
- 20151024_121757.jpg

• Backup of comments_and_community_feedback.docx
• comments_and_community_feedback.docx
• public_comment_tracker.xlsx
• Social CoMMS
- Admin
  - s_comms_budgets
    • budget_estimate_per_ccy.xlsx
    • enumerator_contracts.xlsx
    • enumerator_contracts_westgate.xlsx
    • food_budget.xlsx
    • lekurruki_travel.xlsx
    • meibai_wages.xlsx
    • mpus_kutuk_travel.xlsx
    • Social Comms Budget_Oct14.xlsx
    • social_comms_2015_budget.xlsx
    • social_comms_budget_nov_2015.xlsx
    • social_comms_budget_nov_2015_final.xlsx
    • social_comms_budget_nov_2015_JSW.xlsx
    • social_comms_fgd_one.xlsx
    • westgate_survey.xlsx
  - w3
    • w3_social_comms_nov2015.docx
  - Backup of certificate.docx
  - certificate.docx
  - s_comms_june2015_w3.docx
  - smartphone_numbers.xlsx
  - social_comms_tracker.xlsx
  - Socio Comms Pilot Workplan_07Oct14.docx
- Focus Groups
  - Focus groups SOP

• 10 NRT 2 Chief Scientist Approval Form_SIGNED.docx
• NRT_Field and Primary Data Questionnaire_FINAL_28May14.pdf
• NRT_Request for Approval Form_FINAL_28May14.pdf

- o household survey
- Field tools
- Backup of stones_measurement_guide.docx
- ENNUMERATOR GUIDE_Il Ngewsi.docx
- ENNUMERATOR GUIDE_Kalama.docx
- ENNUMERATOR GUIDE_Melako.docx
- ENNUMERATOR GUIDE_NakupratGotu.docx
- Field Supervisor and Enumerator Training_14Nov14.docx
- Guidelines for Field supervisors.docx
- HOUSEHOLD LOG SHEET_Kalama.docx
- HOUSEHOLD LOG SHEET_Melako_Il Ngwesi.docx
- HOUSEHOLD LOG SHEET_NakuptatGotu.docx
- Melako sample selection_01Dec14.docx
- stones_measurement_guide.docx
- GIS
- scomms_planning.xlsx
- Survey SOP
- Field and Primary Data Questionnaire_NRT Survey_FINAL-signed.pdf
- NRT Chief Scientist Approval Form_FINAL.docx
- Request for Approval Form_NRT Survey_FINAL-signed.pdf
- survey-drafts_comments
- Backup of social_comms_survey_Jul6_draft1.docx
- Backup of social_comms2015Nov4_final.docx
- Backup of social_comms201511Oct29.docx
- NRT Social Comms Household Survey_ FINAL_16Nov14.docx
- NRT Social Comms Household Survey_ Revised_02Jun15.docx
- NRT Social Comms Household Survey_ Revised_10Jun15_dg1.docx
- NRT Social Comms Household Survey_ Revised_10Jun15_dgcomments.docx
- nrt_soc_comms_hhld_survey_oct_29.docx
- nrt_social_comms11Jun15_printcopy.pdf
- Pilot_survey.docx
- Pilot_survey_may282015_dg.docx
- s_comms_xlsforms.xlsx
- s_comms_xlsforms1.xlsx
- scomms_final.xlsx
- social_comms_survey_Jul6_draft1.docx
- social_comms2015Nov4_final.docx
- social_comms2015Nov4_final.pdf
- social_comms201511Jun15final_1.2.pdf
- social_comms201511Jun15final_1.docx
- social_comms201511Jun15final_1.pdf
- social_comms201511Jun15final_1_1.pdf
- social_comms201511Oct29.docx
- test1.xlsx
- Workbook2.xlsx
- SAMPLE SELECTION_Final_09Dec14.docx

o meeting notes

- January2014 Workshop output
- Indicators_Specifics_Table_Distribute.xlsx
- ME_indiscators_summary_JSW_16Nov2013.xlsx

- NRT_TNC_SocialCommsMeeting_Jan2014.docx
- Report_Back.pptx
- Social Comms Meeting Final Agenda_20Jan14.docx
- Theory of Change
- Expanded Results chain.jpg
- Soil Carbon Theory of Change.jpg
- Soil Carbon TOC and NRT Strategic Plan.jpg
- Stable Wildlife TOC and NRT Strategic Plan.jpg
- Minutes from Social-CoMMS discussion_11July2013.doc
- Social Comms Implementation Planning Summary_30Jun14.docx
- Socio Comms Pilot Workplan_07Oct14.docx

o Photos

- HH Survey pilot
- ILNGWESI_0485.JPG
- ILNGWESI_0486.JPG
- ILNGWESI_0487.JPG
- ILNGWESI_0488.JPG
- ILNGWESI_0489.JPG
- ILNGWESI_0490.JPG
- ILNGWESI_0491.JPG
- ILNGWESI_0492.JPG
- ILNGWESI_0494.JPG
- ILNGWESI_0495.JPG
- ILNGWESI_0496.JPG
- ILNGWESI_0497.JPG
- ILNGWESI_0509.JPG
- ILNGWESI_0510.JPG
- ILNGWESI_0511.JPG
- ILNGWESI_0512.JPG
- ILNGWESI_0513.JPG
- ILNGWESI_0516.JPG
- ILNGWESI_0517.JPG
- ILNGWESI_0518.JPG
- KALAMA_0327.JPG
- KALAMA_0328.JPG
- KALAMA_0329.JPG
- KALAMA_0332.JPG
- KALAMA_0334.JPG
- KALAMA_0336.JPG
- KALAMA_0337.JPG
- KALAMA_0338.JPG
- KALAMA_0339.JPG
- KALAMA_0340.JPG
- KALAMA_0341.JPG
- KALAMA_0342.JPG
- KALAMA_0343.JPG
- KALAMA_0344.JPG
- KALAMA_0347.JPG
- KALAMA_0348.JPG
- KALAMA_0353.JPG

- KALAMA_0354.JPG
- KALAMA_0356.JPG
- KALAMA_0357.JPG
- KALAMA_0359.JPG
- KALAMA_0361.JPG
- KALAMA_0363.JPG
- KALAMA_0364.JPG
- KALAMA_0366.JPG
- KALAMA_0369.JPG
- KALAMA_0370.JPG
- KALAMA_0371.JPG
- KALAMA_0372.JPG
- KALAMA_0373.JPG
- KALAMA_0374.JPG
- KALAMA_0375.JPG
- KALAMA_0377.JPG
- KALAMA_0379.JPG
- KALAMA_0381.JPG
- KALAMA_0383.JPG
- KALAMA_0384.JPG
- KALAMA_0385.JPG
- KALAMA_0442.JPG
- KALAMA_0443.JPG
- KALAMA_0444.JPG
- KALAMA_0446.JPG
- KALAMA_0447.JPG
- KALAMA_0448.JPG
- KALAMA_0449.JPG
- KALAMA_0450.JPG
- KALAMA_0450.JPG
- KALAMA_0451.JPG
- KALAMA_0452.JPG
- KALAMA_0453.JPG
- KALAMA_0454.JPG
- KALAMA_0455.JPG
- KALAMA_0456.JPG
- KALAMA_0457.JPG
- KALAMA_0458.JPG
- KALAMA_0459.JPG
- KALAMA_0460.JPG
- KALAMA_0462.JPG
- MELAKO_0523.JPG
- MELAKO_0524.JPG
- MELAKO_0525.JPG
- MELAKO_0526.JPG
- MELAKO_0527.JPG
- MELAKO_0528.JPG
- MELAKO_0529.JPG
- MELAKO_0531.JPG
- MELAKO_0532.JPG

- MELAKO_0535.JPG
- MELAKO_0536.JPG
- MELAKO_0538.JPG
- MELAKO_0539.JPG
- MELAKO_0541.JPG
- MELAKO_0543.JPG
- MELAKO_0548.JPG
- MELAKO_0549.JPG
- MELAKO_0550.JPG
- MELAKO_0551.JPG
- MELAKO_0552.JPG
- MELAKO_0553.JPG
- MELAKO_0554.JPG
- MELAKO_0555.JPG
- MELAKO_0556.JPG
- MELAKO_0557.JPG
- MELAKO_0558.JPG
- MELAKO_0559.JPG
- NAKUPRAT_0397.JPG
- NAKUPRAT_0398.JPG
- NAKUPRAT_0399.JPG
- NAKUPRAT_0400.JPG
- NAKUPRAT_0402.JPG
- NAKUPRAT_0403.JPG
- NAKUPRAT_0404.JPG

o R files
- .Rapp.history
- .Rhistory
- nrt_social_comms_test1_JSW_27Jan2015.r
- nrt_social_comms_test2_JSW_4Feb2015.r
- S_comms_data_cleaning.R

o References
- Research Design for NRT Social Comms Survey_25Sept14.docx
- Survey Methodology Write up_24Nov14.docx

o Reports and papers
- jmuzengezi_draft1
- jmuzengezi_draft2
- kwca
- REGAL IR Reports
- 2015_governance_report.pdf
- ilngwesi_nov112015.pdf
- kalama_nov112015.pdf
- melako_nov112015.pdf
- nakuprat_gotu_nov112015.pdf
- namunyak_nov112015.pdf
- nrtt_opencapital_withnotes.pdf
- Poverty_In_Namunyak.pdf
- s_comms_2015draft1July2015_JSW.pdf
- scomms_2014_draftv3.docx
- scomms_2014_draftv3.pdf

- scomms_allIlngwesi2016-01-18.pdf
- scomms_allKalama2016-01-18.pdf
- scomms_alllekurruki2016-01-18.pdf
- scomms_allmeibae2016-01-18.pdf
- scomms_allMelako2016-01-18.pdf
- scomms_allMpuskutuk2016-01-18.pdf
- scomms_allNakuprat_Gotu2016-01-18.pdf
- scomms_allnamunyak2016-01-18.pdf
- scomms_allsera2016-01-18.pdf
- scomms_allwestgate2016-01-18.pdf
- scomms_quickfactsIlngwesi2015-11-11.pdf
- scomms_quickfactsKalama2015-11-11.pdf
- scomms_quickfactsMelako2015-11-11.pdf
- scomms_quickfactsNakuprat_Gotu2015-11-11.pdf
- scomms_quickfactsnamunyak2015-11-11.pdf
- scomms_quickfactssera2015-11-11.pdf
- scomms_securityIlngwesi2015-11-11.pdf
- scomms_securityKalama2015-11-11.pdf
- scomms_securityMelako2015-11-11.pdf
- scomms_securityNakuprat_Gotu2015-11-11.pdf
- scomms_securitynamunyak2015-11-11.pdf
- scomms_securitysera2015-11-11.pdf
- scomms_wildlifeIlngwesi2015-11-10.pdf
- scomms_wildlifeIlngwesi2015-11-11.pdf
- scomms_wildlifeKalama2015-11-11.pdf
- scomms_wildlifeMelako2015-11-11.pdf
- scomms_wildlifeNakuprat_Gotu2015-11-11.pdf
- scomms_wildlifenamunyak2015-11-11.pdf
- scomms_wildlifesera2015-11-11.pdf
- sera_nov112015.pdf
- Social CoMMS_summary_preliminary_8May2015.docx
- SocialCoMMS_2014Report_Final.pdf

o social_comms_2015

- lekurruki_westgate_mpuskutuk_naibunga

• data

o raw_data

- social_comms_data_nov_2015_lekurruki.xlsx
- social_comms_data_nov_2015_meibae.xlsx
- social_comms_data_nov_2015_mpus_kutuk.xlsx
- social_comms_data_westgate_2015.xlsx

• sampling_frame

o gis_2.qgs
o gis_2.qgs~
o household_data.xlsx
o unmapped_settlements.xlsx

• training

o certificates

- lekurruki

• Backup of l1.docx
• Backup of l10.docx

- l1.docx
- l2.docx
- l3.docx
- l4.docx
- l5.docx
- l6.docx
- l7.docx
- l8.docx
- l9.docx
- l10.docx
- l11.docx
- l12.docx
- l13.docx

 mpus_kutuk

- m1.docx
- m2.docx
- m3.docx
- m4.docx
- m5.docx
- m6.docx
- m7.docx
- m8.docx
- m9.docx
- m10.docx
- m11.docx
- m12.docx

 westgate

- w1.docx
- w2.docx
- w3.docx
- w4.docx
- w5.docx
- w6.docx
- w7.docx

 Backup of meibai1.docx
 Backup of meibai2.docx
 Backup of meibai3.docx
 meibai1.docx
 meibai2.docx
 meibai3.docx
 meibai4.docx
 meibai5.docx
 meibai6.docx
 meibai7.docx
 meibai8.docx
 meibai9.docx

o photos

 IMG_2621.jpg
 IMG_2622.jpg
 IMG_2623.jpg

- IMG_2624.jpg
- IMG_2625.jpg
- IMG_2626.jpg
- IMG_2627.jpg
- IMG_2628.jpg
- IMG_2629.jpg
- IMG_2630.jpg
- IMG_2631.jpg
- IMG_2632.jpg
- IMG_2633.jpg
- IMG_2679.jpg
- IMG_2680.jpg
- IMG_2734.jpg
- IMG_2735.jpg
- IMG_2736.jpg
- IMG_2737.jpg
- IMG_2738.jpg
- IMG_2739.jpg
- IMG_2740.jpg
- IMG_2741.jpg
- IMG_2742.jpg
- IMG_2743.jpg
- IMG_2779.jpg
- IMG_2780.jpg
- IMG_2781.jpg
- IMG_2782.jpg
- IMG_2783.jpg
- IMG_2784.jpg
- IMG_2785.jpg
- IMG_2786.jpg
- IMG_2787.jpg
- IMG_2788.jpg
- IMG_2789.jpg
- IMG_2790.jpg
- IMG_2791.jpg
- IMG_2792.m4v
- IMG_2793.jpg
- IMG_2794.jpg
- IMG_2795.jpg
- IMG_2796.jpg
- IMG_2797.jpg
- IMG_2798.jpg
- IMG_2799.jpg
- IMG_2800.jpg
- IMG_2801.jpg
- IMG_2802.jpg
- IMG_2803.jpg
- IMG_2808.jpg
- social_comms_training.ppt
- sera_namunyak

- focus_group_discussion
  - raw_data
    - IMG_1031.jpg
    - IMG_1032.m4v
    - IMG_1033.jpg
    - IMG_1034.jpg
    - IMG_1035.jpg
    - IMG_1036.jpg
    - IMG_1037.jpg
    - IMG_1038.jpg
    - IMG_1039.jpg
    - IMG_1040.jpg
    - IMG_1041.jpg
    - IMG_1042.jpg
    - IMG_1043.jpg
    - IMG_1044.jpg
    - IMG_1045.jpg
    - IMG_1046.jpg
    - IMG_1047.jpg
    - IMG_1048.jpg
    - IMG_1049.jpg
    - IMG_1050.jpg
    - IMG_1053.jpg
    - IMG_1054.jpg
    - IMG_1055.jpg
    - IMG_1056.jpg
    - IMG_1057.jpg
    - IMG_1058.jpg
    - IMG_1059.jpg
    - IMG_1060.jpg
    - IMG_1061.jpg
    - IMG_1062.jpg
    - IMG_1063.jpg
    - IMG_1064.jpg
    - IMG_1065.jpg
    - IMG_1066.jpg
    - IMG_1067.jpg
    - IMG_1068.jpg
    - IMG_1069.jpg
    - IMG_1070.jpg
    - IMG_1071.jpg
    - IMG_1072.jpg
    - IMG_1073.jpg
    - IMG_1074.jpg
    - IMG_1075.jpg
    - IMG_1076.jpg
    - IMG_1077.jpg
    - IMG_1078.jpg
    - IMG_1079.jpg
    - IMG_1080.jpg

- IMG_1081.jpg
- IMG_1082.jpg
- IMG_1083.jpg
- IMG_1084.jpg
- IMG_1085.jpg
- IMG_1086.jpg
- IMG_1087.jpg
- IMG_1088.jpg
- IMG_1089.jpg
- IMG_1090.jpg
- IMG_1091.jpg
- IMG_1092.jpg
- IMG_1093.jpg
- IMG_1094.jpg
- IMG_1095.jpg
- IMG_1096.jpg
- IMG_1097.jpg
- IMG_1098.jpg
- IMG_1099.jpg
- IMG_1100.jpg
- sera_fgd.xlsx
- sera_fgd_feedback.xlsx
- sera_sapa.xlsx
- sampling_frame
- admin
- recommendation-letter.docx
- gis
- nrt_census_2009.cpg
- nrt_census_2009.dbf
- nrt_census_2009.dbf~
- nrt_census_2009.prj
- nrt_census_2009.qpj
- nrt_census_2009.shp
- nrt_census_2009.shx
- nrt_towns_scomms2015.dbf
- nrt_towns_scomms2015.prj
- nrt_towns_scomms2015.qpj
- nrt_towns_scomms2015.shp
- nrt_towns_scomms2015.shx
- population.qgs
- population.qgs~
- s_comms_june2015.bmp
- s_comms_june2015.qgs
- s_comms_june2015.qgs~
- s_comms_template.qpt
- scomms_census_data.dbf
- scomms_census_data.prj
- scomms_census_data.qpj
- scomms_census_data.shp
- scomms_census_data.shx

- scomms_census2015.dbf
- scomms_census2015.prj
- scomms_census2015.qpj
- scomms_census2015.shp
- scomms_census2015.shx
- scomms_districts.dbf
- scomms_districts.prj
- scomms_districts.qpj
- scomms_districts.shp
- scomms_districts.shx
- scomms_towns.dbf
- scomms_towns.prj
- scomms_towns.qpj
- scomms_towns.shp
- scomms_towns.shx
- scosial_comms2015_map.bmp
- scosial_comms2015_map.bmpw
- sera_namunyak.cpg
- sera_namunyak.dbf
- sera_namunyak.dbf~
- sera_namunyak.prj
- sera_namunyak.qpj
- sera_namunyak.shp
- sera_namunyak.shx
- sera_settlements.dbf
- sera_settlements.prj
- sera_settlements.qpj
- sera_settlements.shp
- sera_settlements.shx
- Untitled.qgs

o Methodology

- psws_probability_prop_size_bierrenbach.pdf
- Sample_ NG_settlement_data_Social_CoMMS_31Oct2014_JM.xlsx

o Sample

- household_data_june_2015.xlsx
- namunyak_enumerators.xlsx
- sera_enumerators.xlsx

o settlement_data

- namunyak_settlements_water

• Namunyak_Settlements_2014.dbf
• Namunyak_Settlements_2014.prj
• Namunyak_Settlements_2014.shp
• Namunyak_Settlements_2014.shp.xml
• Namunyak_Settlements_2014.shx
• WaterDataNamunyakConservancy2014.dbf
• WaterDataNamunyakConservancy2014.prj
• WaterDataNamunyakConservancy2014.sbn
• WaterDataNamunyakConservancy2014.sbx
• WaterDataNamunyakConservancy2014.shp
• WaterDataNamunyakConservancy2014.shp.xml

- WaterDataNamunyakConservancy2014.shx
- household_data.xlsx
- household_data_final.xlsx
- namunyak_settlements.xlsx
- sera_hhdata.xlsx
- sera_settlements.txt
- sera_settlements_water.xlsx
- social_comms_2015.qgs
- social_comms_2015_report
- graphs
- age.pdf
- assets.pdf
- benefits.pdf
- conflict_rankpdf.pdf
- iga_options_who_nm.eps
- iga_options_who_se.eps
- info_source.pdf
- livestock_nm.pdf
- livestock_se.pdf
- negative_impact.pdf
- positive_impact.pdf
- scosial_comms2015_map.bmp
- water_sources.pdf
- report
- Backup of s_comms_2015draft2September2015.docx
- s_comms_2015draft1July2015.docx
- s_comms_2015draft1July2015.pdf
- s_comms_2015draft1July2015_JSW.pdf
- s_comms_2015draft2September2015.docx
- sapa_presentation.pptx
- social_comms_raw_data_2015
- social_comms_data_namunyak.xlsx
- social_comms_data_sera .xlsx
- social_comms_data_template1.xlsx
- social_comms_2015.qgs~
- social_comms_data
- baselines
- pilot__clean_details.xlsx
- pilot_clean_baseline.xlsx
- pilot_clean_characteristics.xlsx
- pilot_clean_combined.xlsx
- pilot_clean_details.xlsx
- pilot_clean_perceptions.xlsx
- social_comms_data_namunyak.xlsx
- social_comms_data_nov_2015_lekurruki.xlsx
- social_comms_data_nov_2015_meibae.xlsx
- social_comms_data_nov_2015_mpus_kutuk.xlsx
- social_comms_data_sera .xlsx
- social_comms_data_westgate_2015.xlsx
- combined_data

- assets.csv
- ccy.csv
- cellphone.csv
- grazing.csv
- health.csv
- hhld.csv
- security.csv
- survey.csv
- wildlife.csv

o social_comms_pilot_2014

 Data Cleaning

- Combined Clean Files

o pilot__clean_details.xlsx
o pilot_clean_baseline.xlsx
o pilot_clean_characteristics.xlsx
o pilot_clean_combined.xlsx
o pilot_clean_details.xlsx
o pilot_clean_perceptions.xlsx

- combined_files

o .Rhistory
o pilot_baseline.xlsx
o pilot_characteristics.xlsx
o pilot_details.xlsx
o pilot_perceptions.xlsx

- HHSurveyDataCheckedAW

o data_entry

 S_comms_data_entry_Anne_Checked.xlsx
 S_comms_data_entry_Doris_Checked.xlsx
 S_comms_data_entry_Ethi (Moses)_Checked.xlsx
 S_comms_data_entry_KAREN_Checked.xlsx
 S_comms_data_entry_Kioko_2_Checked.xlsx
 S_comms_data_entry_Kioko_3_Checked.xlsx
 S_comms_data_entry_Kioko_3_CheckedDGedit.xlsx
 S_comms_data_entry_Laresoro Kalama_Checked.xlsx
 S_comms_data_entry_Lucy_Checked.xlsx
 S_comms_data_entry_Mwenda_Checked.xlsx
 S_comms_data_entry_Nadungoro_Checked.xlsx

o R files

 S_comms_data_cleaning.R

o Temp

 S_comms_data_entry_Kioko_3_Checked.xlsx

o .Rhistory

- Data-Edits.xlsx

 Data Entry Template

- S_comms_data_entry_template_DRAFT_TESTING1.xlsx

 preliminary data

- Data entry Combined Kalama, Biliqo, Ilngwesi & Nakuprat Gotu.xlsx
- NRT HHSurvey 2014.xlsx
- S_comms_data_entry_Anne.xlsx
- S_comms_data_entry_Doris.xlsx

- S_comms_data_entry_Ethi (Moses).xlsx
- S_comms_data_entry_KAREN.xlsx
- S_comms_data_entry_Kioko.xlsx
- S_comms_data_entry_Laresoro Kalama.xlsx
- S_comms_data_entry_Lucy.xlsx
- S_comms_data_entry_Mwenda Complete.xlsx
- S_comms_data_entry_Mwenda.xlsx
- S_comms_data_entry_Nadungoro.xlsx
- scomms_2014_draftv1.docx
  - preliminary outputs
- assets
  - asset_wealth_ccy.xlsx
  - assets_ccy.png
  - comms.xlsx
  - hhld-assets.xlsx
  - power.xlsx
  - transport_asset.xlsx
- lhd_activities
  - activity_edu.png
  - activity_gender.png
  - activity_responsible.xlsx
  - activity_responsilibility1.tiff
  - edu_activity.png
  - edu_activity_gen.tiff
  - edu_gender.png
  - Edu_levels.tiff
  - F_activity.xlsx
  - hh_size.xlsx
  - household_size.png
  - income_sources 3.xlsx
  - income_sources.xlsx
  - job_types2.xlsx
  - lhd_activities_prop.png
  - Scomms_activity.tiff
  - scomms_age.tiff
  - scomms_edu.tiff
  - scomms_marital_status.tiff
  - scomms_overview.xlsx
- perceptions
  - lstock.xlsx
  - lstock_incursions.png
  - lstock_numbers.png
  - NRT_projects.png
  - scoms_perceptions.xlsx
  - wild_issues.png
  - wild_threats.png
  - wildlife_problems.png
- Rangelands
  - lstock_numbers
    - all_lstock.png

- live_freq_ccy.xlsx
- livestock_numbers camels.png
- livestock_numbers cattle.png
- livestock_numbers chicken.png
- livestock_numbers donkeys.png
- livestock_numbers goats.png
- livestock_numbers other.png
- livestock_numbers sheep.png
- livestock_numbers sheep.png
- lstock_range
- all_lstock_range.png
- live_range_ccy.xlsx
- livestock_range camels.png
- livestock_range cattle.png
- livestock_range chicken.png
- livestock_range donkeys.png
- livestock_range goats.png
- livestock_range other.png
- livestock_range sheep.png
- livestock_range shoats.png
- lstock_sold
- all_lstock_sold.png
- live_sold_ccy.xlsx
- livestock_sold camels.png
- livestock_sold cattle.png
- livestock_sold chicken.png
- livestock_sold donkeys.png
- livestock_sold goats.png
- livestock_sold other.png
- livestock_sold sheep.png
- livestock_sold shoats.png
- Training
- Jan2016_training
- scomms_jan2016_agenda.docx
- Social CoMMs Data
- pilot__clean_details.xlsx
- pilot_clean_baseline.xlsx
- pilot_clean_characteristics.xlsx
- pilot_clean_combined.xlsx
- pilot_clean_details.xlsx
- pilot_clean_perceptions.xlsx
- social_comms_data_namunyak.xlsx
- social_comms_data_nov_2015_lekurruki.xlsx
- social_comms_data_nov_2015_meibae.xlsx
- social_comms_data_nov_2015_mpus_kutuk.xlsx
- social_comms_data_sera .xlsx
- social_comms_data_westgate_2015.xlsx
- Supporting Documents
- Supporting documents
- Carbon Consents

- Biliqo-Bulesa carbon consent.pdf
- Il Ngwesi carbon consent.pdf
- Kalama carbon consent.pdf
- Lekurruki carbon consent.pdf
- Leparua carbon consent.pdf
- Meibae carbon consent.pdf
- Melako carbon consent.pdf
- Naibunga carbon consent.pdf
- Nakuprat-Gotu carbon consent.pdf
- Namunyak - Naluwon carbon consent.pdf
- Namunyak- Ngilai carbon consent.pdf
- Namunyak-Kalepo carbon consent.pdf
- Nasuulu carbon consent.pdf
- Oldonyiro (Mpus Kutuk) main carbon consent.PDF
- Sera carbon consent.pdf
- West Gate carbon consent
- West Gate carbon consent.pdf

 Certificates of Incorporation

- Biliqo Bulesa COI 2013.pdf
- Biliqo Bulesa Tax PIN.pdf
- Kalama COI.pdf
- Kalama GR tax PIN.pdf
- Lekurruki COI.pdf
- Lekurruki Tax PIN.pdf
- Leparua COI.pdf
- Leparua Tax PIN.pdf
- Meibae COI.pdf
- Meibae Tax PIN.pdf
- Melako COI.pdf
- Melako Tax PIN.pdf
- Naibunga Tax PIN.pdf
- Nakuprat-Gotu COI.pdf
- Nakuprat-Gotu Tax PIN.pdf
- Namunyak COI.pdf
- Namunyak Tax PIN.pdf
- Nasuulu COI.pdf
- Sera COI.pdf
- Sera Tax PIN.pdf
- Westgate COI.pdf
- Westgate Tax PIN.pdf

 Climate change references

- Boone_et_al-2018-Global_Change_Biology.pdf
- Collins et al 2013 IPCC WG1AR5_Chapter12_FINAL.pdf
- Gichangi et al 2015 Climatic Change.pdf
- Kipuri & Ridgewell Report Exclusion of Pastoralist Women in the East and Horn of Africa.pdf
- Lu2018_Article_AnExtremeNegativeIndianOceanDi.pdf
- Ritchie Global_Env Change Serengeti 2008.pdf

 Conflict Resolution

- Biliqo Bulesa Conflict Resolution Report 2018.pdf

- Drought and Conflict Resolution_Annual Report (1) ELIJA.pdf
- Conservancy Reports
- Biliqo Bulesa
- Ilngwesi
- Ishaqbin
- Jaldesa
- Kalama
- Lekurruki
- Leparua
- Ltungai
- Meibae
- Melako
- Naapu and Nanapisho
- Naibunga
- Nakuprat-Gotu
- Namunyak
- Nannapa and Narupa
- Nasuulu
- Ngare Ndare- Forest
- Sera
- Shurr
- Songa
- Westgate
- Annual report for Isiolo county_Priscilla lalampaa.docx
- MINUTES OF GRAZING COMMITTEE HELD ON 10th DECEMBER 2018 AT MASE CONSERANCY HQ.docx
- NRT close out technical report _Priscilla.docx
- Social Survey Methods
- Social survey design v3 June 13 2013 (1).pdf
- vulnerable groups
- Isiolo Conservancies training Westgate.docx
- Nakuprat-Gotu training to Westgate.pdf
- Fire history map for East Africa.pdf
- HR Policy and Procedures Manual November 2015 (1).pdf
- LOW_Res_2017_State_Of_Conservancies_Report.+FINAL.pdf
- Management Conservancies or Areas N Kenya A3_MainMap2018_LOWRES.pdf
- NKGCP adaptive management plan 2017.pdf
- Northern Kenya Carbon Project Summary.docx
- NRT Carbon Workshop Sept 2017.pdf
- NRT Women Experiences.pdf
- NRTStrategic+Plan.2018-22.November_FINAL_LowRes.pdf
- NRTT SPARD report FINAL NRT GRAZING PLAN AND STRATEGY (1) (1).pdf
- SocReport_2015_Final_Spreads_LowRes.pdf
- Wildlife-CoMMS+guide_complete_low_res.pdf
- GPS LOCATIONS FOR DOCUMENTS POSTED. – Shortcut
- NKCP VCS CCB Monitoring Impl Report - v5 July 29 2015 (1).docx
- NKCP VCS CCB Monitoring Impl Report - v5 July 29 2015.docx
- NKCP VCS CCB Project Description v1 0 draft 2 -.docx
- NKCP VCS CCB Project Description v1.0 draft 4.docx
- NRT2015GrazImpact.tif

- NRT2015GrazImpact.tif.aux.xml
- NRTGrazImpAprMay2015.tif
- NRTGrazImpAugSept2015.tif
- NRTGrazImpFebMar2015.tif
- NRTGrazImpJanFeb2015.tif
- NRTGrazImpJulyAug2015.tif
- NRTGrazImpJunJuly2015.tif
- NRTGrazImpMarApr2015.tif
- NRTGrazImpMayJune2015.tif
- NRTGrazImpNovDec2015.tif
- NRTGrazImpOctNov2015.tif
- NRTGrazImpSeptOct2015.tif
- Key Spreadsheets
  - Key Spreadsheets
    - NKCP Cash Flow and NPV v1 Feb 2019.xlsx
    - NRT Soil Carbon Data and Removal Calculations v4.xlsx
- Main Documents
  - Main Documents
    - 090_SFTF_CCB_Rd2ResponseMER_20180928 v2.docx
    - 090_SftFMER_VCS_Round_2_Findings_FINAL_20180916.xlsx
    - Errata and Clarifications VM0032 03052019.docx
    - NKCP Non-Permanence Risk Report v3.2.docx
    - NKCP VCS CCB Monitoring Impl Report - v2.1 April 25 2017.pdf
    - NKCP VCS CCB Project Description v2.1.3 draft 1 Feb 12 2019.pdf
    - NKGCP adaptive management plan 2017.pdf

Documents received 06 March 2019
- 090_SftFMER_VCS_Round_2_Findings_FINAL_20180916.xlsx
- NKCP VCS CCB Monitoring Impl Report - v2.1 April 25 2017.pdf
- NKCP VCS CCB Project Description v2.1.3 draft 1 Feb 12 2019.pdf
- Key Spreadsheets
  - historical_livestock_numbers_combined_20Nov2014 version2 (Autosaved).xlsx
  - Leakage livestock numbers.xlsx
  - NDVI Biomass validation 2014.xlsx
  - NKCP Cash Flow and NPV Change Calc 2019-02-27.xlsx
  - NKCP Cash Flow and NPV v1 Feb 2019.xlsx
  - NKCP Conservancy Basic Data.xlsx
  - NKCP quick summary financials Feb 2019.xlsx
  - NKCP quick summary financials.xlsx
  - NRT HH Livestock Survey Nov 2014.xlsx
  - NRT NDVI Trends 20022014.xlsx

Documents received 22 March 2019
- NKCP methane calculations 2017.xlsx

Documents received 01 April 2019
- VM0032-Errata-and-Claifications-1APR2019.pdf

Documents received 10 April 2019
- NKCP SNAP Monte Carlo simulation.xlsx

- Public model v3 NRT calcs.xls

Documents received 06 May 2019
- NKCP New GIS round 3
  - NKCP Polygons May 6 2019 shape
    - NRTConservancyStrataFinal2017-Soka-May6.cpg
    - NRTConservancyStrataFinal2017-Soka-May6.dbf
    - NRTConservancyStrataFinal2017-Soka-May6.prj
    - NRTConservancyStrataFinal2017-Soka-May6.sbn
    - NRTConservancyStrataFinal2017-Soka-May6.sbx
    - NRTConservancyStrataFinal2017-Soka-May6.shp
    - NRTConservancyStrataFinal2017-Soka-May6.shp.xml
    - NRTConservancyStrataFinal2017-Soka-May6.shx
  - NRTConservancyStrataFinal2017-Soka_Calculated area_Ha.xls
  - NRTConservancyStrataFinal2017-Soka-May6.kml

Documents received 10 May 2019
- NKCP Round 3 new docs
  - Finances
    - NKCP Business Plan.docx (1).doc
    - NKCP Business Plan.docx.doc
    - NKCP Cash Flow and NPV Change Calc FINAL 2019.xlsx
    - NKCP quick summary financials.xlsx
  - Main New Documents
    - 090_SFTF_CCB_MER_20190503.docx
    - 090_SFTF_VCS_Findings_MER 20190509.xlsx
    - NKCP Non-Permanence Risk Report v3.2 2019-05-07.docx
    - NKCP VCS CCB Monitoring Impl Report v2.3 FINALMay 8 2019.pdf
    - NKCP VCS CCB Project Description v2.1.4 FINAL.pdf
  - New References
    - Ansari-Renani2016_Article_AnInvestigationOfOrganicSheep Iran pastoralists.pdf
    - FEBRUARY_et_al-2013-Austral_Ecology (1) annuals perennials.pdf
    - Hassen and Tesfaye 2014 sheep and goats Ethiopia.pdf
    - KinnairdandOBrien2012 descriptions of livestock management on Laikipia private Conservancies.pdf
    - Kosgey et al 2008 Sheep and goats of smallholders in northern Kenya.pdf
    - Malumbres-Olarte et al 2017 biodiversity sampling methods (1).pdf
    - Mathews Forest Ecological Assessment (1).pdf
    - oduor et al 2018 CO2 and grazing.pdf
    - Robertson et al 1994 C flows into roots shoots annuals and perennials.pdf
    - Snyman 2014 fire on root production.pdf
    - Welemarium et al 2018 water conservation and soil carbon.pdf
    - Ye etal 2017 tree grass savanna annuals perennials.pdf
  - New Spreadsheets
    - Leakage livestock numbers v2 May 5 2019.xlsx
    - NKCP methane calculations 2019 v2.xlsx
    - NKCP Monte Carlo by strata.xlsx
    - NKCP SNAP Monte Carlo simulation.xlsx
    - NRT 2014 Livestock Herder Survey Analysis.xlsx
    - NRT Soil Carbon Data and Removal Calculations v4.1.xlsx

- New Supporting Documents
  - Northern Kenya Grasslands Carbon Project SOP livestock monitoring.pdf
  - NRT members KWCA letter.pdf
- NKCP New GIS round 3
  - NKCP Polygons May 6 2019 shape
- NRTConservancyStrataFinal2017-Soka-May6.cpg
- NRTConservancyStrataFinal2017-Soka-May6.dbf
- NRTConservancyStrataFinal2017-Soka-May6.prj
- NRTConservancyStrataFinal2017-Soka-May6.sbn
- NRTConservancyStrataFinal2017-Soka-May6.sbx
- NRTConservancyStrataFinal2017-Soka-May6.shp
- NRTConservancyStrataFinal2017-Soka-May6.shp.xml
- NRTConservancyStrataFinal2017-Soka-May6.shx
  - NRTConservancyStrataFinal2017-Soka_Calculated area_Ha.xls
  - NRTConservancyStrataFinal2017-Soka-May6.kml
- Raw Data
  - Kenyameanannualrain.adf
  - NRT Lignin analysis by plant species 2014.xlsx
  - NRT NKCP veg summary.xlt
  - nrt_mark_cn_20160822.csv
  - nrt_mark_soil20120910.csv

Documents received 15 May 2019
- NRT Soil Carbon Data and Removal Calculations v4.2.xlsx

Documents received 01 June 2019
- Protected Area Analysis

Documents received 12 June 2019
- NRTConservancyStrataFinal2017-Soka_Calculated area_June3_2019.xls
- Round 4 New References
  - Biondini_et_al-1998-Ecological_Applications ANPP and BNPP decline together under heavy grazing.pdf
  - FEBRUARY_et_al-2013-Austral_Ecology (1) annuals perennials.pdf
  - Robertson et al 1994 C flows into roots shoots annuals and perennials.pdf
  - Ye etal 2017 tree grass savanna annuals perennials.pdf
- 090_SFTF_CCB_Round4_Findings_20190530_kcm .docx
- 090_SFTF_VCS_Responses to Findings_20190612 SftF & NE.xlsx
- NKCP Round 4 Documents\Leakage livestock numbers v2.1 June 4 2019.xlsx
- NKCP methane calculations 2019 v2.2 June 8 2019.xlsx
- NKCP Non-Permanence Risk Report v4 2019-06-11.docx
- NKCP VCS CCB Monitoring Impl Report - v2.4 June 12 2019.pdf
- NKCP VCS CCB Project Description v3.1 June 11 2019 FINAL.pdf
- NRT 2014 Livestock Herder Survey Analysis v2.2 June 2019.xlsx
- NRT HH Livestock Survey Nov 2014 rev June 3 2019.xlsx
- NRT NKCP veg summary corrected.xlt
- NRT Soil Carbon Data and Removal Calculations v4.3 .xlsx

Documents received 02 July 2019
- NKCP Non-Permanence Risk Report v4.1 2019-07-02.pdf

- NKCP Non-Permanence Risk Report v4.1 2019-07-02_clean.docx
- NKCP Non-Permanence Risk Report v4.1 2019-07-02_tracked changes.docx

Documents received 09 July 2019
- NKCP methane calculations 2019 v2.3 July 9 2019.xlsx

Documents received 11 July 2019
- NKCP methane calculations 2019 v2.3.1 July 11 2019.xlsx
- NRT HHSurvey 2014.xlsx

Documents received 17 July 2019
- NKCP methane calculations 2019 v2.3.2 July 17 2019
- McNaughton et al 1998 Ecology roots.pdf
- NRT Soil Carbon Data and Removal Calculations v4.4.xlsx
- SNAP model and validation comments July 9 2019
- Veldhuis et al 2019 Science Serengeti Squeeze.pdf

Documents received 06 August 2019
- NRT Soil Carbon Data and Removal Calculations v4.5 Aug 6 2019.xlsx

Documents received on 07 November 2019
- 090_SFTF_VCS_Responses to Findings_20191105 SftF _ NE.xlsx
- Leakage livestock numbers v2.1 June 4 2019.xlsx
- NKCP methane calculations 2019 v2.3.1 July 11 2019.xlsx
- NKCP VCS CCB Monitoring Impl Report - v3.0 November 6 2019 FINAL_clean.docx
- NKCP VCS CCB Monitoring Impl Report - v3.0 November 6 2019 FINAL_clean.pdf
- NKCP VCS CCB Monitoring Impl Report - v3.0 November 6 2019 FINAL_tracked.docx
- NKCP VCS CCB Project Description v4.0 Nov 6 2019 FINAL.pdf.
- NKCP VCS CCB Project Description v4.0 Nov 6 2019 FINAL_clean.docx.
- NKCP VCS CCB Project Description v4.0 Nov 6 2019 FINAL_tracked.docx
- NRT Soil Carbon Data and Removal Calculations v4.6 Oct 31 2019.xlsx

Documents received on 21 November 2019
- Guidance to Changes in the NKCP documents 21 Nov 2019.docx
- NKCP VCS CCB Project Description v4.1 Nov 21 2019.pdf
- NKCP VCS CCB Project Description v4.1 Nov 21 2019_clean.docx
- NKCP VCS CCB Project Description v4.1 Nov 21 2019_tracked.docx
- NRT Soil Carbon Data and Removal Calculations v4.7 Nov 21 2019.xlsx

Documents received on 26 November 2019
- Guidance to Changes in the NKCP documents 21 Nov 2019.docx
- NKCP VCS CCB Project Description v4.3 Nov 26 2019_clean.docx
- NKCP VCS CCB Project Description v4.3 Nov 26 2019_tracked.docx
- NRT Soil Carbon Data and Removal Calculations v4.9 Nov 26 2019.xlsx
- NRTConservancyStrataFinal2017-Soka-Nov25.cpg
- NRTConservancyStrataFinal2017-Soka-Nov25.dbf
- NRTConservancyStrataFinal2017-Soka-Nov25.kml
- NRTConservancyStrataFinal2017-Soka-Nov25.prj
- NRTConservancyStrataFinal2017-Soka-Nov25.shp
- NRTConservancyStrataFinal2017-Soka-Nov25.shx

- NRTConservancyStrataFinal2017-Soka_Calculated area_June2019.xls
- NRTConservancyStrataFinal2019-Soka_Calculated area_Nov2019 (2).xls
- NRTConservancyStrataFinal2019_Soka_Nov 25.kml

Documents received on 02 December 2019
- NAK6 Google Earth.png
- NRT NKCP veg summary corrected.xlt
- SNAP model and validation comments July 9 2019.docx
-

Documents received on 05 December 2019
- NKCP VCS CCB Project Description v4.3 Dec 5 2019.doc
- NRT Soil Carbon Data and Removal Calculations v5.2 Dec 5 2019_JP.xlsx
- NRTConservancyStrataFinal2019_JP.cpg
- NRTConservancyStrataFinal2019_JP.dbf
- NRTConservancyStrataFinal2019_JP.kml
- NRTConservancyStrataFinal2019_JP.prj
- NRTConservancyStrataFinal2019_JP.qpj
- NRTConservancyStrataFinal2019_JP.shp
- NRTConservancyStrataFinal2019_JP.shx
- NRTConservancyStrataFinal2019_JP.xlsx
- NRTConservancyStrataFinal2019_JP.zip
-

Documents received on 06 December 2018
- Leakage livestock numbers v2.2 Dec 2019.xlsx
- NKCP methane calculations v2.3.3 Dec 2019.xlsx
- NKCP VCS CCB Project Description v4.3 Dec 6 2019.doc
- NRT Soil Carbon Data and Removal Calculations v5.3 Dec 6 2019.xlsx
- NRTConservancyStrataFinal2019_JP_noLEK.zip
- Re__Sftf_timing.zip

Documents received on 12 December 2019
- Response to Northern Kenya Grasslands Project Extension Request 10DEC2019.pdf

Documents received on 22 December 2019
- NKCP December 22, Round 7 Upload-20191223T140040Z-001.zip
- 090_SFTF_VCS_Findings_2019_Working SFF NE FINAL responses Dec22_2019.xlsx
- Leakage livestock numbers v2.2 Dec 2019.xlsx
- NKCP methane calculations v2.3.3 Dec 2019.xlsx
- NKCP VCS CCB Project Description v5.1 CLEAN Dec 22 2019.doc
- NKCP VCS CCB Project Description v5.1 Dec 22 2019.doc
- NKCP VCS CCB Project Description v5.1 Dec 22 2019.pdf
- NRT Soil Carbon Data and Removal Calculations v5.4 Dec 22 2019.xlsx
- Public model v4 NRT calcs Dec22_2019.xlsx

Documents received on 02 January 2020
- NRTConservancyStrataFinal2019_JP_noLEK.cpg
- NRTConservancyStrataFinal2019_JP_noLEK.dbf
- NRTConservancyStrataFinal2019_JP_noLEK.kml
- NRTConservancyStrataFinal2019_JP_noLEK.prj
- NRTConservancyStrataFinal2019_JP_noLEK.qpj

- NRTConservancyStrataFinal2019_JP_noLEK.shp
- NRTConservancyStrataFinal2019_JP_noLEK.shx
- NRTConservancyStrataFinal2019_JP_noLEK.xlsx
- NRTConservancyStrataFinal2019_JP_noLEK.zip
- NRTConservancyStrataFinal2019-JP.cpg
- NRTConservancyStrataFinal2019-JP.dbf
- NRTConservancyStrataFinal2019-JP.kml
- NRTConservancyStrataFinal2019-JP.prj
- NRTConservancyStrataFinal2019-JP.qpj
- NRTConservancyStrataFinal2019-JP.shp
- NRTConservancyStrataFinal2019-JP.shx
- NRTConservancyStrataFinal2019-JP.zip

Documents received on 03 January 2020
- NKCP VCS CCB Project Description v5.2 Jan 3 2020.doc
- NRT Soil Carbon Data and Removal Calculations v5.5 Jan 3 2020.xlsx

Documents received on 05 January 2020
- NKCP VCS CCB Project Description v5.2 Jan 5 2020.pdf
- NKCP VCS CCB Project Description v5.2 Jan 5 2020_clean.doc
- NKCP VCS CCB Project Description v5.3 Jan 5 2020.pdf
- NKCP VCS CCB Project Description v5.3 Jan 5 2020_clean.doc
- NKCP VCS CCB Project Description v5.3 Jan 5 2020_tracked.doc
- NRT Soil Carbon Data and Removal Calculations v5.4 Jan 2 2020.xlsx

Documents received on 06 January 2020
- NKCP VCS CCB Project Description v5.3 Jan 5 2020_clean
- NRT Soil Carbon Data and Removal Calculations v5.5 Jan 5 2020
- NKCP VCS CCB Project Description v5.3 Jan 5 2020