

Validated by:



**Rainforest  
Alliance**

65 Millet St. Suite 201  
Richmond, VT 05477 USA  
Tel: 802-434-5491  
Fax: 802-434-3116  
[www.rainforest-alliance.org](http://www.rainforest-alliance.org)

Carbon Forestry Validation Audit  
Managed by:  
Western Europe Regional Office  
Contact person: Mateo Cariño Fraise  
Email: [mcarino@ra.org](mailto:mcarino@ra.org)



**Rainforest  
Alliance**

Validation  
**Assessment**  
Report for:

**Forest Again**  
in  
**Western Province, Kenya**

Report Finalized: 25 November 2009  
Audit Dates: 25 May to 30 May 09  
Audit Team: Joseph William Osei  
Bob Akede Odhiambo

Type of Validation: CCBA  
Validation code: RA-VAL-CCB-011513  
Validation issued: 5 January 2010

*Report based on Standard(s): CCBA Standards Second Edition*

Organization Contact: Dr. Mark Lung  
Address: Executive Director  
Eco2librium LLC in Boise, Idaho U.S.A  
332 S. Haines, Boise, Idaho 83706  
Tel: 208-921-8707  
Email: [mlung@eco2librium.net](mailto:mlung@eco2librium.net)

## Table of Contents

1	INTRODUCTION .....	3
2	AUDIT CONCLUSIONS.....	3
3	AUDIT PROCESS .....	14
	Appendix A: COMPANY DETAILS.....	17
1	CONTACTS .....	17
2	SmartWood Website Customer Fact Sheet .....	17
3	Validation Scope.....	18
	Appendix B: STANDARD CHECKLIST CCB STANDARDS .....	19
1	Evaluation of Project.....	19
2	Evaluation Details .....	19
3	Standard Checklist.....	20
	Appendix C: STAKEHOLDER LISTS.....	66

## 1 INTRODUCTION

The purpose of this report is to document conformance of the Forest Again Project with the requirements of CCBA project design validation standards. Eco2librium are the project proponents, hereafter referred to as the "Company". It should be noted that at the time of the audit Eco2librium were called Making Connections, but Making Connections have since changed their name. The report presents the findings of SmartWood auditors who have evaluated company systems and performance against the applicable standard(s). Section 2 below provides the audit conclusions and any necessary follow-up actions by the company through corrective action requests.

This evaluation follows Climate, Community and Biodiversity Project Design Standards, Second Edition, December 2008. These were not developed by Rainforest Alliance, but by the Climate, Community and Biodiversity Alliance, CCBA. SmartWood CCBA evaluation reports are kept confidential in the draft stage. When finalized and successfully approved, the report is posted on SmartWood's website and that of the CCBA.

The Rainforest Alliance's certification program, SmartWood, was founded in 1989 to certify responsible forestry practices and now focuses on providing a variety of certification and auditing services. In 2005, Rainforest Alliance extended our role as a forest assessor/auditor to standards and services that included verification of forest carbon projects. Rainforest Alliance has the following status with the listed climate related standards and systems:

- Chicago Climate Exchange - we are an *associate member* and an approved *verifier*
- Climate, Community & Biodiversity Alliance – we are a *member* and an approved *verifier*
- Plan Vivo – we are a *verifier*
- Voluntary Carbon Standard – we are an accredited *validator & verifier*

The CCBA Standards are primarily project design standards and demonstrated conformance to the standard in this audit related to the planning, development, and design of the project in the inception or start-up phase. Conformance related to systems, design, and proposed activities in the process of development by the project. The standards were not used to measure project implementation, thus conformance to the standard was not meant to evaluate any delivery of emissions reductions, community or biodiversity benefits, or other results hoped to be achieved through future performance of the project. The CCBA Standards were designed to be a tool to demonstrate high-quality project design that should lead to multiple-benefits in addition to carbon sequestration and emissions reductions. Use of the standards may increase confidence in forestry carbon projects.

Dispute resolution: If SmartWood clients encounter organizations or individuals having concerns or comments about Rainforest Alliance / SmartWood and our services, these parties are strongly encouraged to contact SmartWood Headquarters directly. Formal complaints or concerns should be sent in writing.

## 2 AUDIT CONCLUSIONS

### 2.1 Summary of Conformance to CCBA Standards

Eco2librium LLC is a limited liability company with headquarters in Gunnison, Colorado in the United States of America. The company is working with a number of state organizations in academia and research as well as non-governmental organizations in Kenya to carry out reforestation of some degraded portions of the Kakamega forest in the Western Province of Kenya. The Kakamega Forest, represents one of the few remaining series of fragmented rainforest in East Africa and currently the only remaining rainforest of its kind in Kenya. It has been fragmented as a result of land clearing during the last 30 to 50 years. Though the clearing is said to have stopped, the cleared areas continue to remain as grass and

shrubby land without the capacity of naturally regenerating due high levels of grazing by cattle from surrounding communities and the inadequate funding and management capacity of the Kenya Forest Service (KFS) to carry out reforestation of the areas involved.

The reforestation project is called Forest Again (Msitu Tena in the local language). Major activities of the project are aimed at restoring some of the degraded portions of the Kakamega forest through the planting of indigenous plant species to service as corridors to link fragmented portions of the forest. The Forest Again project is expected to generate a net climate benefit of approximately 422,925 tCO<sub>2</sub> over the next 40 years. The resultant indigenous forest corridors are expected to increase the survival of the Blue Monkey, and prevent the extinction of between 4 to 6 birds among other biodiversity benefits. The Forest Again project plans to work with communities to improve their well-being through direct employment, procurement of planting material from community nurseries, train them in other income generation and conservation activities among others benefits.

As a result of the validation field work, the following findings are presented for each section of the CCBA standards:

### General Section

G1. Original Conditions in the Project Area	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Required
G2. Baseline Projections	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Required
G3. Project Design & Goals	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Required
G4. Management Capacity and Best Practices	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Required
G5. Legal Status and Property Rights	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Required

### Conformance:

### Climate Section

CL1. Net Positive Climate Impacts	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Required
CL2. Offsite Climate Impacts ("Leakage")	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Required
CL3. Climate Impact Monitoring	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Required

### Conformance:

### Community Section

CM1. Net Positive Community Impacts	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Required
CM2. Offsite Community Impacts	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Required
CM3. Community Impact Monitoring	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Required

### Conformance:

### Biodiversity Section

B1. Net Positive Biodiversity Impacts	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Required
B2. Offsite Biodiversity Impacts	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Required
B3. Biodiversity Impact Monitoring	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Required

### Conformance:

### Gold Level Section

GL1. Climate Change Adaptation Benefits	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Optional
GL2. Exceptional Community Benefits	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Optional
GL3. Exceptional Biodiversity Benefits	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Optional

### Conformance:

### CCBA Validation Level Attained:

Approved	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Gold (GL1, GL2)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

## 2.2 Auditor Recommendation

Based on Company's conformance with CCBA requirements, the auditor makes the following recommendation:



Validation approved:  
CAR(s) closed



Validation not approved:

Conformance with CAR(s) required

Additional comments:

## 2.3 Corrective Action Requests

### 2.3.1 Corrective Action Requests (CARs)

*Note: CARs describe required actions or improvements that address COMPANY non-conformances identified during audits. CARs include defined timelines for completion. CARs issued during assessments /reassessments shall be closed prior to issuance of Validation. CARs issued during audits shall be closed within timeline or result in suspension.*

<b>CAR 01/09</b>	Reference Standard & Requirement: G1.3
Non-conformance:	<b>Description of non-conformance</b> : The Forest Again PDD does not accurately describe the actual project site boundaries
<b>Corrective Action Request:</b> Forest Again shall provide accurate description of the actual project site boundaries in its PDD.	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	Forest Again made available to the validation team after the project site visits a revised PDD which incorporates the description of the project sites including maps. It states that the proponent has taken project site boundary measurements and Global Positioning System (GPS) coordinates of boundary points.
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	An observation was raised, see OBS 02/09

<b>CAR 02/09</b>	Reference Standard & Requirement: G1.4
Non-conformance:	<b>Description of non-conformance</b> : Forest Again's PDD does not give pre-project carbon stocks information of the project sites.
<b>Corrective Action Request:</b> Forest Again shall provide information about the current carbon stocks of the project area using land use stratification or vegetation type and appropriate method of carbon calculation.	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	Forest Again has carried out field measurements to estimate baseline carbon stocks at the two project sites. The method used was appropriate and the proponent has provided the results in the revised PDD which was reviewed by the validation team.
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	

<b>CAR 03/09</b>	Reference Standard & Requirement: G2.2
Non-conformance:	<b>Description of non-conformance</b> : The Forest Again project does not account for trees already planted in parts of its project area or the KFS's planting programme on the sites to justify that the KFS planting programme will not continue or the KFS would not have reforested the area under the current planting programme or forest management planning for the Kakamega Forest and for that matter the Forest Again carbon project is additional.

<b>Corrective Action Request:</b> Forest Again shall justify in the PDD that predicted project benefits would occur as a result of the implementation of the project's own reforestation activities and that reforestation of the degraded sites of the Kakamega forest would not have occurred without the Forest Again project or the project does not preempt what the KFS would have done under its current planting programme or management planning for the Kakamega Forest	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	Forest Again provided strong additionality justification in the revised PDD to indicate that the KFS is indeed constrained in terms of inadequate human resources and financial capacity, among other factors, to reforest the proposed project site.
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	

<b>CAR 04/09</b>	Reference Standard & Requirement: G3.3
Non-conformance:	<b>Description of non-conformance :</b> Forest Again does not have a map that identifies: the project location and boundaries of project sites, the project zone and locations where project activities are predicted to have impact
<b>Corrective Action Request:</b> Forest Again shall provide a map that clearly identifies the project location and boundaries of project sites, the project zone and any specific location predicted to be impacted by project activities.	
Timeline for conformance	Prior to validation
Evidence to close CAR:	Forest Again provided a revised PDD that clearly identifies the project location and boundaries of project sites, project zone, and where project impacts are expected. The PDD provides three maps that enable one to clearly identify the project location and boundaries of project sites, project zone, and where project impacts are likely to be located.
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	

<b>CAR 05 /09</b>	Reference Standard & Requirement: G3.4
Non-conformance:	<b>Description of non-conformance :</b> The Forest Again PDD does not include project implementation schedule to indicate key project development dates and milestones.
<b>Corrective Action Request: :</b> Forest Again shall define a project implementation schedule to include key project development dates and milestones.	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	Forest Again made available to the validation team a revised PDD which contains project implementation schedule to cover the entire 40 years of the project life and indicating key dates and milestone in the project's development.
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	

<b>CAR 06 /09</b>	Reference Standard & Requirement: G 3.10
Non-conformance:	<b>Description of non-conformance :</b> The Forest Again PDD does not include adequate clear formalised process for handling unresolved conflicts and grievances that arise during project planning and implementation.
<b>Corrective Action Request:</b> Forest Again shall update its PDD to include clear formalized process of handling unresolved conflict and grievances that arise during project planning and implementation	

Timeline for conformance:	Prior to validation
Evidence to close CAR:	A revised PDD made available to the validation team contains conflicts and grievances resolution protocols for project workers and the communities. The protocols include processes for hearing, recording, responding to and storage of records. It also identifies how the project will communicate the protocols to project workers and the use of a 3 <sup>rd</sup> party in the management of conflicts and grievances process to avoid conflict of interest.
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	An observation was raised, see OBS 03/09

<b>CAR 07 /09</b>	Reference Standard & Requirement: G4.3
Non-conformance:	<b>Description of non-conformance</b> :The Forest Again PDD does not include a plan for providing education and training to project staff and relevant community members to include identification of how training will be passed on to new workers..
<b>Corrective Action Request:</b> Forest Again shall update its PDD to include a plan for giving orientation and training to project staff and other members of the community to meet the requirements of this standard.	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	Forest Again made a revised PDD available to the validation team that contained a plan for provision of orientation and training for the project staff, community forest associations and other members of the community. The plan also includes how training will be passed on to other workers of the project.
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	

<b>CAR 08 /09</b>	Reference Standard & Requirement: G4.4
Non-conformance:	<b>Description of non-conformance</b> : Forest Again does not explain how it is going to select employees for positions in the project.
<b>Corrective Action Request</b> : : Forest Again shall explain how it will select employees for positions in the project.	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	Forest Again made available to the validation team a revised PDD which clearly indicates how the project is going to select employees for positions in the project. The selection process and the requirements clearly makes it possible to include local community members and the 'most in need'
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	

<b>CAR 09/09</b>	Reference Standard & Requirement: G4.5, G5.1
Non-conformance:	<b>Description of non-conformance</b> : A list of relevant national laws and regulations on the project made available to the validation team does not include relevant laws and regulations covering workers' rights in Kenya and applicable international agreements and treaties.
<b>Corrective Action Request:</b> Forest Again shall update its list of relevant laws and regulations to include those covering workers' rights in Kenya and applicable international agreements and treaties	
Timeline for conformance:	Prior to validation

Evidence to close CAR:	Forest Again made available to the validation team a revised PDD which contains a comprehensive list of relevant Kenya laws on workers' rights and safety as well as relevant international regulations and treaties. The revised PDD also clearly indicates that all project activities will comply with these Kenya/local law and international treaties and regulations
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	

<b>CAR 10/09</b>	Reference Standard & Requirement:G4.6
Non-conformance:	<b>Description of non-conformance</b> :. Forest Again's PDD does not include comprehensive occupational safety assessment and plan to inform workers of identified risks and how to reduce them
<b>Corrective Action Request:</b> Forest Again shall update its PDD to include the results of comprehensive occupational safety assessment and a plan to inform workers of indentified risks and how to reduce them.	
Timeline for conformance:	Prior to validation:
Evidence to close CAR:	Forest Again made available to the validation team a revised PDD which contains a summary of results of an occupational risk assessment that the project proponents indicated to have conducted. The revised PDD also indicates that the project is developing a 'project worker manual' to include work safety issues and methods to avoid/reduce risks and what workers can do in the event of accidents and emergencies. It also contains project risk management plan indicating how worker will be informed of the project's risks management, safety and risks management procedures among others related issues
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	

<b>CAR 11/09</b>	Reference Standard & Requirement: G4.7
Non-conformance:	<b>Description of non-conformance</b> : The Forest Again documentation on financial health of the project implementation partners does not include reliable sources of documentation to inform the adequacy of financial resources to implement the project.
<b>Corrective Action Request</b> : Forest Again shall have reliable documentation of financial health (e.g. audited financial statements, annual budgets) of implementing organizations to demonstrate the adequacy of financial resources for the implementation of the project	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	Forest Again provided a revised PDD with additional information on financing sources to demonstrate that anticipated revenue streams can adequately implement the project.
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	

<b>CAR 12/09</b>	Reference Standard & Requirement: G5.2
Non-conformance:	<b>Description of non-conformance</b> : Though the Forest Again PDD indicates to have had the full support and rights from the KFS, there exist no documented proof as required by the Kenya Forest Act (2005) and also the project has no Environmental Impact Licence as required under the Kenya Environmental Management and Co-ordination Act No.8 of 1999.

<b>Corrective Action Request:</b> Forest Again shall obtain documented approval from appropriate authorities to meet all project planning, implementation or regulatory requirements to include permit from the KFS and Environmental Impact License from the NEMA.	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	A revised Forest Again PDD made available to the validation team includes supporting letters from the provincial heads of the KFS and NEMA.
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	An observation was raised, see OBS 04/09

<b>CAR 13/09</b>	Reference Standard & Requirement: G5.6
Non-conformance:	<b>Description of non-conformance :</b> Forest Again's has not provided legal documentation to prove that it is developing the forest carbon project on behalf of the Kenya Forest Service (KFS) as indicated in the PDD.
<b>Corrective Action Request:</b> Forest Again shall provide legal documents to demonstrate that it is developing the forest carbon project on behalf of the KFS as it has indicated in the PDD.	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	Forest Again made available to the validation team a draft MoU which is expected to be signed between the KFS and KEEP which among other things will give KEEP the rights to develop carbon projects in collaboration with the KFS. Though the MoU is yet to be signed, updates from project proponents and key PMT members indicate that this will be done soon.
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	An observation was raised, see OBS 05/09

<b>CAR 14/09</b>	Reference Standard & Requirement: CL1.1
Non-conformance:	<b>Description of non-conformance :</b> Calculation of biomass and expansion to hectare for trees > 160cm in Forest Again's referenced forest carbon data is not transparent enough and consistent with the methodology employed. Forest Again also does not provide justification for the 912.8 tCO <sub>2</sub> reference forest value and the 20 tCO <sub>2</sub> /ha pre-project carbon stock as well as the assumption that referenced forest deadwood biomass is based on 5% of the combined above and below ground biomass.
<b>Corrective Action Request:</b> Forest Again shall update its reference forest carbon data to be more transparent and consistent with the methodology used; justify the 912.8 t CO <sub>2</sub> ha <sup>-1</sup> reference forest value and the 20 tCO <sub>2</sub> /ha pre-project carbon stock assumption and the assumption that, referenced forest deadwood biomass is based on 5% of the combined above and below ground biomass	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	Forest Again has revised its PDD to include field estimates of baseline carbon stocks for the Kisaina project site and justification for the use of 5% of combined above and below ground biomass in the estimation of deadwood biomass.
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	An observation was raised, see OBS 0609

<b>CAR 15/09</b>	Reference Standard & Requirement: CL3.1
Non-conformance:	<b>Description of non-conformance</b> :Forest Again indicated in its PDD not to include monitoring of non-CO <sub>2</sub> GHG in its climate impact monitoring plan because the project anticipates them to be less than 15% (CO <sub>2</sub> equivalent) of the overall GHG impact over each monitoring period. This assumption is however not consistent with the requirement of the CCB standards which sets the threshold at less than 5%
<b>Corrective Action Request:</b> Forest Again shall update its PDD on the less than 15% non-CO <sub>2</sub> GHG assumption for the proposed climate impact monitoring plan to meet the requirements of the CCBA standards	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	Forest Again made available a revised PDD to reiterate the project will not use fertilizers and will adopt low impact planting technologies while grazing cattle which is expected to be relocated by the KFS is independent of project activities and therefore anticipate less than 5% project non-CO <sub>2</sub> change
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	

<b>CAR 16/09</b>	Reference Standard & Requirement: CM1.1
Non-conformance:	<b>Description of non-conformance</b> :The Forest Again PDD does not have an estimate of the project's impact on its defined community based on planned project activities using appropriate methods.
<b>Corrective Action Request</b> : Forest Again shall estimate the impact of the project on its defined community based on the project's planned activities using appropriate methodologies	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	Forest Again's revised PDD states that the proponent used the Sustainable Livelihood Framework to assess the baseline livelihood assets of the project's surrounding communities. Using a referenced publication, Forest Again indicates that the communities livelihood assets which are currently small are likely to decrease without the project. It uses the planned project activities to show that implementation of the project activities will results in net positive impact on all the five livelihood assets of the communities
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	

<b>CAR 17/09</b>	Reference Standard & Requirement: GL 1.1
Non-conformance:	<b>Description of non-conformance</b> : Though Forest Again identifies increased rainfall and run-off as well as increased evaporative demand as some of the likely climate change and climate variabilities within the equatorial Kenya zone where the project is located, it does not identify likely without land use changes
<b>Corrective Action Request:</b> Forest Again shall, on the basis of the identified regional climate change and climate variabilities, identify likely without project local land-use changes.	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	Forest Again in its revised PDD made available to the validation team identifies increased grazing as the likely without project land use of the project area. It states that this scenario is based on the predicted habit shift, increased total precipitation concentrated within few days and the general drought in Africa as a result of climate change.
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	

<b>CAR 18/09</b>	Reference Standard & Requirement: GL 1.4
Non-conformance:	<b>Description of non-conformance</b> : The Forest Again PDD does not contain the demonstration of the project activities to help communities and/or biodiversity to adapt to likely impacts of climate change neither is the proposed project management plan to deal with the issue ready.
<b>Corrective Action Request:</b> Forest Again shall demonstrate that project activities will help communities and/or biodiversity to adapt to the likely impacts of climate change.	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	Forest Again made available a revised PDD to indicate that the project plans to help cattle owners within the community to make a transition to zero grazing so as to reduce overgrazing pressure on the area. It further states that the project's key activity of planting 490 ha representing 4.9% of existing forest in the area constitutes a significant forest cover and potentially may reduce impacts of local temperature extremes predicted by climate change.
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	

<b>CAR 19/09</b>	Reference Standard & Requirement: GL 2.2
Non-conformance:	<b>Description of non-conformance</b> : Though Forest Again enumerates various measures and practices of the project that will benefit the communities and indicates that it will be hiring specifically from communities and households with most need, the PDD does not show that at least 50% of households within the lowest category of well-being of the communities are likely to benefit more from the project.
<b>Corrective Action Request:</b> Forest Again shall demonstrate that at least 50% of households within the lowest category of well-being of the community are likely to benefit more from the project	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	The revised PDD made available to the validation team clearly defines and quantifies the 'most in need' group in the project area. Forest Again further states five different ways supported by number through which the 'most need' households will be affected to demonstrate that at least 50% of these most need households are likely to benefit from the project.
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	

<b>CAR 20/09</b>	Reference Standard & Requirement: GL2.3
Non-conformance:	<b>Description of non-conformance</b> :The Forest Again PDD does not show that barriers or risks likely to prevent the flow of project benefits to poorer households within the communities are identified and addressed so as to increase the likelihood of project benefits reaching such households.
<b>Corrective Action Request:</b> Forest Again shall show that any barriers or risks likely to prevent benefits flow to poorer households in the communities are identifies and are addressed; so as to increase the chances of project benefits flow to such households	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	The revised PDD indicates to have identified through literature and interview with the people four key barriers likely to prevent project benefit flows to the 'most need' in the project area and have specified ways to address these barriers.

<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	

<b>CAR 21/09</b>	Reference Standard & Requirement: GL2.4
Non-conformance:	<b>Description of non-conformance :</b> The Forest Again PDD does not show that the project has identified poorer or more vulnerable households or individuals whose well-being or poverty situation can be negatively affected by project activities and that it has design measures to prevent such impacts. It also does not show that in situations where such negative impact are unavoidable, the project will implement effective measure to reduce such impacts
<b>Corrective Action Request:</b> Forest Again shall demonstrate that the project has identified poorer or more vulnerable households or individuals whose well-being or poverty may be affected negatively by the project and that measure are designed to avoid such impacts. In situations where negative impacts are unavoidable, the project must show that effective mitigation measure will be implemented	
Timeline for conformance:	Prior to validation
Evidence to close CAR:	The revised Forest Again PDD indicates to have identified households which hire out their young boys to tend the cattle of rich cattle owners for a fee of around US\$15/month as the group likely to be negatively affected by the project as it works to relocate cattle or promote zero grazing. The project plans target these boys and their families to either give them tasks which can enable them work and as well go to school or provide a source of income to enable them send these boys to school.
<b>CAR Status:</b>	CLOSED
Follow-up Actions (if any):	

### 2.3.2 Observations

*Note: Observations are issued for areas that the auditor sees the potential for improvement in implementing standard requirements or in the quality system; observations may lead to direct non-conformances if not addressed.*

<b>OBS 01/09</b>	Reference Standard & Requirement: GL 2.5
<b>Description of findings leading to observation:</b> Forest Again has yet to develop its full community monitoring plan to include identification of negative and positive impact on poorer and more vulnerable groups and its social monitoring to also take a differentiated approach so as to indentify positive and negative impacts on poorer and households and disadvantaged individuals.	
<b>Observation:</b> Forest Again in preparing its community impact monitoring plan should identify negative and positive impacts on poorer and more vulnerable groups and it social monitoring should take a differentiated approach in order to identify positive and impacts on poorer households and disadvantaged individuals.	

<b>OBS 02/09</b>	Reference Standard & Requirement: G1.3
<b>Description of findings leading to observation:.</b> Forest Again revised PDD provides description and maps of the project sites and indicated to have taken field measurements and GPS coordinates of project site boundaries without providing this information as part of the PDD	
<b>Observation:.</b> Forest Again should provide the project boundary field measurements and GPS coordinates as annex to the PDD.	

<b>OBS03 /09</b>	Reference Standard & Requirement: G3.10
<b>Description of findings leading to observation:</b> The Forest Again conflicts and grievances resolution protocols clearly indicate how project workers will be made aware of the process but does not indicate how the protocols will be publicized to the wider communities	
<b>Observation:</b> The Forest Again conflict and grievances resolution protocols must be publicized to the communities and the project should endeavour to do that.	

<b>OBS 04/09</b>	Reference Standard & Requirement: G5.2
<b>Description of findings leading to observation:</b> Forest Again revised PDD contains supporting letters from the head of the KFS Western Conservancy and the Western Province Director of the NEMA. It indicates that the project is a collaboration with the KFS and the NEMA and is expecting an exemption letter from the NEMA Director. To be consistent with the Kenya Forest ACT 2005, the project needs the consent of the KFS Board of Directors. Likewise, it will also need the exemption letter from the NEMA Director or the FORM 3.	
<b>Observation:</b> .Forest Again after receiving supporting letters from the Western Province Director of NEMA and the head of the KFS Western Conservancy should obtain documented approval (in the case of KFS the consent of the Board of Directors) and for the NEMA (exemption letter from the NEMA Director or the FORM 3) consistent with the respective policy and regulation	

<b>OBS 05/09</b>	Reference Standard & Requirement: G5.6
<b>Description of findings leading to observation:</b> .Forest Again has made available to the validation team a draft MoU expected to be signed between KFS and KEEP to cover among other things the rights for KEEP to develop carbon projects.	
<b>Observation:</b> . Forest Again should ensure that all agreements leading to granting of carbon rights to the project has been established before any transaction on the project's carbon assets	

<b>OBS 06/09</b>	Reference Standard & Requirement: CL1.1
<b>Description of findings leading to observation:</b> The revised PDD made available to the validation team includes updated project net GHG removals. This includes field estimate of baseline carbon stocks at the Kisaian project site and justification for the use of the 5% combined above and below ground wood biomass to estimate deadwood biomass. In the estimation of the above-ground biomass and with all other estimates, Forest Again did not use the lower bound confidence level values to remain conservative in its estimates.	
<b>Observation:</b> Forest Again should use the lower bound confidence interval values in the estimate of its carbon values.	

## 2.4 Actions Taken by Company Prior to Report Finalization

Upon receipt of the draft validation report of 10-July-09, the project proponents made available to Rainforest Alliance documents that included notes from the Project Management Team highlighting how they should address CARs raised in the draft report.

The project proponent asked for a 30-day extension in meeting the deadline for addressing the CARs that had been set by Rainforest Alliance and this was granted. The reason for seeking the extension was to enable the project to address CARs 12/09 and 13/09 which depended upon agreements with the KFS. Forests Again updated its PDD and together with its comments on the draft report made these available to Rainforest Alliance.

Key updates in the Forest Again PDD besides those directed at the CARs include, the change of name and address of the project proponent from 'Making Connections LLC - of Dept. of Nat. Res. and Environmental Sch. Western State Collage of Colorado, Gunnison, CO 81231, USA to Eco2librium LLC in Boise, Idaho U.S.A, of 332 S. Haines, Boise, Idaho 83706, Tel: 208-921-8707, Email: [mlung@eco2librium.net](mailto:mlung@eco2librium.net).

This final validation report is thus based on the the actions taken by the project proponent and as evidenced in the updated PDD of 10-September-09 received from the project proponents.

### 3 AUDIT PROCESS

#### 3.1 Audit Overview

*Note: The table below provides an overview of the audit scope. See standard checklist appendix for specific details on auditor qualifications, staff interviewed, and audit findings per facility audited.*

Location/Facility	Date(s)	Length of Audit	Auditor(s)
KFS Western Conservancy Manager's office, Kakamega	25 May 2009	3 hours (opening meeting)	B A Odhiambo; J W Osei
Iloilo Project area	25 May 2009	2 ½ hours (visit proposed project area)	B A Odhiambo; J W Osei
KEEP office	26 May 2009	1 ½ hours (meeting with KEEP Director other PMT members)	B A Odhiambo; J W Osei
Isecheno portion of Kakamega forest	26 May 2009	2 hours (visit to project reference site, A1)	B A Odhiambo; J W Osei
Kisaini area, Kakamega forest	26 May 2009	3 hours (visit to project area B)	B A Odhiambo; J W Osei
KEEP Bandas, kakamega forest	26 May 2009	30 minutes (progress and logistical meeting with Eco2librium Director)	B A Odhiambo; J W Osei
Isecheno Community	27 May 2009	4 hours (visit to community and community nurseries)  Interview with community and nursery workers	B A Odhiambo; J W Osei
KEEP Bandas	27 May 2009	3 hours (Document review)	B A Odhiambo; J W Osei
Friends Hotel, Kakamega	28 May 2009	2 hours meeting with the Prof. Senelwa	B A Odhiambo; J W Osei
YMCA Hostel, Nairobi	30 May 2009	11/2 hours meeting with Dr. Winfred Musila	B A Odhiambo; J W Osei

## 3.2 Description of Audit Process

Following initial communications between Eco2librium LLC (the client and project proponent) and Rainforest Alliance, Eco2librium LLC submitted the Project Design Document (PDD) for the Forest Again Reforestation Project to Rainforest Alliance. At the same time, the client also posted the PDD and supporting documents on [www.climatestandards.org/projects](http://www.climatestandards.org/projects) for public comments.

Rainforest Alliance auditors carried out a pre-validation review of the PDD and the supporting documents. Based on the preliminary results of the pre-validations review, Rainforest Alliance asked for additional supporting documents but confirmed and indicated to Eco2librium LLC that, a field visit could be undertaken. Following the submission of the additional supporting documents and a promise to make the remaining documents available on-site, an audit schedule was agreed upon to include a site visit between 25th and 29th May 2009. The CCBA also made available public comments received to Rainforest Alliance for review by the audit team.

On arriving at the project site on 25th May 2009, the two Rainforest Alliance auditors (a local auditor and an international Lead Auditor) held opening meeting with the Project Management Team (PMT) of the project. Rainforest Alliance auditors briefed the meeting of the objectives of the validation and the field visit and explained what the team would be doing during the period. The PMT also gave overview of the Forest Again project and the role of the different collaborating organizations. The meeting was also used to plan for specific sites to visit including logistics.

Over the course of the five-day period, the audit team visited various project sites and zones as outlined in section 3.1 above. The team held meetings with some of the key stakeholders, visited all project areas by walking through the grounds; randomly visited some communities and community nurseries (proposed as sources of seedling for the project); interviewed nursery workers and some community members. Where time could not allow, telephone interviews were also used to get the views of other key stakeholder during the process. On regular basis, the audit team reviewed and checked project documents and records, field observations, stakeholder comments and responses against the CCBA Standard. Document review continued after the field visit while the validation draft report is prepared.

## 3.3 Documents reviewed

- Forest Again: Compansionate Forest Carbon Offset. PDD for CCBA
- Fragmentation Study, By Mark Lung
- Leakage from Forest Again Project Activities, By Mark Lung
- Estimation of Referest Forest Carbon Stocks
- Forest Again Reference Forest Carbon Data, By Mark Lung
- Proceedings of Carbon Feasibility Workshop 23 – 25 May 2008
- Mstitu Tena Project: Outreach program to community around Kakamega forest
- Environmental Laws in Kenya (a write up by Forest Again)
- Stakeholder Dialogue to Develop Project
- Community Study in Forest Again Project Zone, By Mark Lung
- Support Letters from Project Management Team
- BOITA EAS-NMK Kakamega Forest Restoration Programme: Concept Note
- Forest Again Laws and Regulations Draft 1
- The Environmental Management and Co-ordination Act, 1999 No 8 of 1999
- The environmental (impact assessment and audit) regulations, 2003, LEGAL NOTICE No. 101
- Environmental management and coordination Act (no 8 of 1999)

- Environment impact assessment guidelines and administrative procedures
- Kenya Forest ACT 2005
- FAO, 1997. Estimating Biomass and Biomass Change of Tropical Forests: a Primer. (FAO Forestry Paper - 134)

### **3.4 Stakeholder consultation process (if applicable)**

The CCBA Standards require that project proponents make the PDD and other supporting documents of a project for validation available to the CCBA. CCBA upon receipt of the documents post them on its website and invites the public for comments within 30 days. Forest Again made its PDD and supporting documents available to the CCBA and was posted on the CCBA website from 24 April to 24 May 2009.

During this public comment period, the audit team received a comment from the public through the CCBA which had to do with compliance with national laws regarding the requirement of the Kenyan Environmental Management and Co-ordination Act # 8 of 1999, regarding the requirement for reforestation and afforestation projects to go through Environmental Impact Assessment (EIA).

The audit team upon receipt of the comment reviewed relevant Kenyan laws, regulation and guidelines and during the on-site validation, met and spoke with different stakeholders including, an official from the National Environmental Management Authority (NEMA), communities, project management team members, researches, academics, government official among others. The conclusion was that Forest Again must submit its project report to NEMA as required by law. A decision can then be taken by NEMA whether the project needs to undergo Environmental Impact Assessment or not based on the results from the evaluations of the Forest Again's project report.

## Appendix A: COMPANY DETAILS

### 1 CONTACTS

#### 1.1 Primary Contact for Coordination with SmartWood

Primary Contact, Position:	Dr. Mark Lung, Executive Director
Address:	<u>Eco2librium LLC in Boise, Idaho U.S.A</u> 332 S. Haines, Boise, Idaho 83706
Tel/Fax/Email:	Tel: 208-921-8707 Email: <a href="mailto:mlung@eco2librium.net">mlung@eco2librium.net</a>

#### 1.2 Billing Contact

Contact, Position:	Dr Mark Lung, Executive Director
Address:	<u>Eco2librium LLC in Boise, Idaho U.S.A</u> 332 S. Haines, Boise, Idaho 83706
Tel/Fax/Email:	Tel: 208-921-8707 Email: <a href="mailto:mlung@eco2librium.net">mlung@eco2librium.net</a>

### 2 SmartWood Website Customer Fact Sheet

*Note: upon Validation, the SmartWood website posts and maintains Customer Fact Sheets for companies with the information in the table below at <http://www.ra-smartwood.org/>*

Field	Text for Customer Fact Sheet	Has this Info Changed?
Contact, Title: (Sales & Marketing)	Dr. Mark Lung, Executive Director	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Address:	<u>Eco2librium LLC in Boise, Idaho U.S.A</u> 332 S. Haines, Boise, Idaho 83706	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Tel/Fax/Email/Website:	Tel: 208-921-8707 Email: <a href="mailto:mlung@eco2librium.net">mlung@eco2librium.net</a>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Products/Descriptions:		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

### **3 Validation Scope**

#### **3.1 Scope Definition:**

This is a carbon forest project design validation for the Forest Again reforestation project developed on behalf of the Kenyan Forest Service on public land located in the Kakamega Forest Reserve in the Western Province of Kenya. The project intends to reforest approximately 473 hectares of cleared open forest and grassland to mimic the original indigenous forest. The aim is to restore and conserve biodiversity, enhance local livelihood, and to sequester approximately 422,000 of CO<sub>2</sub> during the 40 year project period.

**3.2 Type of Legal Entity:** Limited Liability Company

**3.3 Jurisdiction:** Colorado, United States of America

## Appendix B: STANDARD CHECKLIST CCB STANDARDS

### 1 Evaluation of Project

Project Name:	Forest Again Reforestation Project
Contact for Validation:	Dr. Mark Lung
Address:	<u>Eco2librium LLC in Boise, Idaho U.S.A</u> 332 S. Haines, Boise, Idaho 83706
Tel/Fax/Email:	Tel: 208-921-8707 Email: <a href="mailto:mlung@eco2librium.net">mlung@eco2librium.net</a>

### 2 Evaluation Details

Auditor(s), Qualifications:	<p><u>Joseph William Osei</u> A Natural Resources Manager, with specialization in forestry. Has more 16 years experience in forest plantation and natural forest management. Has undergone many forest management and chain-of-custody certification trainings and completed the SmartWood Lead Auditors training course. He has participated more than 12 forest management/forest Carbon and chain-of-custody assessments for the Rainforest Alliance and Proforest in Ghana and other African countries. Holds a BSc in natural resources management, MSc. in Tropical Forestry with specialization in Forest Economics and Master of Business Administration (MBA) in Strategic Management.</p> <p><u>Bob Akede Odhiambo</u> Holds a bachelors degree in Agribusiness management, and certificate in project planning and management. Currently is an auditor in Africert Certification Company. He has undergone Café and Rainforest Alliance auditor training, and has conducted audits against the same standards in the country (Kenya). Bob has also experience working with Millennium Village Projects in areas of farmer linkages, seed distribution and sustainability of community projects, and formulation and training of producer business groups.</p>
Sites Visited:	See section 3.1 of the main report above
People Interviewed, Titles:	Dr. Mark Lung, Executive Director, Making Connections LLC Now <u>Eco2librium LLC in Boise, Idaho U.S.A</u>

### 3 Standard Checklist

Climate, Community and Biodiversity Project Design Standards  
Second Edition, December 2008

## GENERAL SECTION

### G1. Original Conditions at Project Site - Required

#### Concept

The original conditions at the project area<sup>1</sup> and the surrounding project zone<sup>2</sup> before the project commences must be described. This description, along with baseline projections (G2), will help to determine the likely impacts of the project.

#### Indicators

The project proponents must provide a description of the project zone, containing all the following information:

#### General Information

- 1) The location of the project and basic physical parameters (e.g. soil, geology, climate).

Findings	The Forest Again PDD clearly describes the location of the project as located within the established boundaries of the Kakamega National Forest in the Western Province of Kenya. This has been supported with satellite imagery, digital maps and photos showing the location of Kakamega forest and the project sites relative to their surroundings. The PDD also describes the basic physical parameters of the project zone to include the soils as largely ferrallo-chromic or humic cambisols, elevation as ranging from 1500m -1,700m above sea level, and containing indigenous forests, swamp and riverine forests, disturbed and colonizing forest, plantations and natural grass glades as the main habitats. The headwaters of the two main rivers in the district are located within the Kakamega forest		
Conformance CAR/OBS	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

- 2) The types and condition of vegetation within the project area.

Findings	The Forest Again PDD describes the vegetation type of the project area as closed indigenous forests, plantation, natural grass glades, disturbed and secondary successional vegetations. The closed canopy indigenous forest is estimated to cover about 30% of the Kakamega Forest. The validation team visited the project sites and saw them to be mainly grasslands and shrublands.		
Conformance CAR/OBS	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

- 3) The boundaries of the project area and the project zone.

Findings	Both the boundaries of the project area and zone are shown in a map and described in the text of the PDD. The project zone is described as encompassing the boundaries of the Kakamega forest and its surrounding approximately 57 villages within 5km around the forest. The project area is described as being made up of two sites, - A and B. The boundaries of the two sites are described by coordinates in WGS 1984 UTM (Decimals) using Zone 36N and by their adjoining sites. It came out during the validation team's visit to the sites that, one of the original project areas (site A) has		
----------	---	--	--

<sup>1</sup> The 'project area' is defined as the land within the carbon project boundary and under the control of the project proponent.

<sup>2</sup> The 'project zone' is defined as the project area and the land within the boundaries of the adjacent communities potentially affected by the project.

been dropped from the project and replaced with a new project area (Iloro). The reason for this change according to Forest Again is that the first site is BIOTA's Restoration Project site where planting of some indigenous trees has already been carried out. The aim of this planting is to create a corridor to connect the fragment to the main Kakamega Forest block. Though Forest Again showed the map of this new project site to the team and the team also visited the site, its boundaries have not been described in the PDD. Besides, the field inspection also revealed that, the actual areas (hectare) in some parts of the Kisaini project site are over-estimated in the PDD

Amended Findings:

Forest Again provided the validation team with a revised PDD containing description and maps of the two project sites – Ilhoro (located between 0°10'30" and 0°12'30" north and 34°50'0" and 34°52'0" east) and Kisaina (located 0°13'0" and 0°14'0" north and 34°51'0" and 34°54'0" east). It indicates that the actual boundaries of the project sites have been established through field measurements and Global Positioning System (GPS) coordinates. Total project area was estimated to be around 490 ha. It would have been better if Forest Again had provided the established field measurements and GPS coordinates as an annex to PDD.

Conformance  
CAR/OBS

Yes  No  N/A

**CAR 01/09:** Forest Again shall provide accurate description of the actual project site boundaries in its PDD.

CAR 01/09 was closed following the action taken by Forest Again as evidenced in the revised PDD and as described in the amended findings above.

An observation was raised as described in OBS 02/09 below.

OBS 02/09; Forest Again should provide the established project site boundary field measurements and GPS coordinates as annex to its PDD

## Climate Information

- 4) Current carbon stocks within the project area(s), using stratification by land-use or vegetation type and methods of carbon calculation (such as biomass plots, formulae, default values) from the Intergovernmental Panel on Climate Change's 2006 Guidelines for National GHG Inventories for Agriculture, Forestry and Other Land Use<sup>3</sup> (IPCC 2006 GL for AFOLU) or a more robust and detailed methodology.<sup>4</sup>

Findings

Forest Again indicates in the PDD to measure current carbon stocks within the project areas in May 2009. The project also indicated to the validation team during a site visit that sampling and tree measurements for estimating carbon stocks have been carried out in the project sites to that effect, but no further information was made available to the team. Section CL1, 1 (pre-project Carbon Stocks) is cross-referenced to section G1, B 4, 'for details of methods and results of pre-project carbon stocks at the project sites' but no information is currently available at this section of the PDD. In estimating the net GHG removal from the project site in other sections of the PDD e.g. section CL1.1 however, Forest Again used 20 tCO<sub>2</sub>/ha pre-project carbon assumption (See CAR 14/09) pending the results of the measurements in May 2009 as mentioned above.

<sup>3</sup> Volume 4 Agriculture, Forestry and Other Land Use <http://www.ipcc-nggip.iges.or.jp/public/2006gl/vol4.html>

<sup>4</sup> In cases where a published methodology is used, the full reference must be given and any variations from the published methodology must be explained.

Amended findings:

The Forest Again revised PDD made available to the validation team contains results of field work carried out to estimate baseline carbon stocks for the two project sites. The results indicated that the mean baseline carbon stock at the Ilhoro site was negligible while the Kisaina site had mean tC of 4.04/ha. As reviewed by the team, the methodology used was appropriate.

Conformance  
CAR/OBS

Yes  No  N/A

**CAR 02/09:** Forest Again shall provide information about the current carbon stocks of the project area using land use stratification or vegetation type and appropriate method of carbon calculation

CAR 02/09 was closed following the action taken by forest again as evidenced in the revised PDD and as described in the amended findings to section G1.4 above.

### Community Information

- 5) A description of communities<sup>5</sup> located in the project zone, including basic socio-economic and cultural information that describes the social, economic and cultural diversity within communities (wealth, gender, age, ethnicity etc.), identifies specific groups such as Indigenous Peoples<sup>6</sup> and describes any community characteristics.<sup>7</sup>

Findings

The Forest Again PDD provides comprehensive descriptions of villages within 5 kilometers of the Kakamega forest reserve. This description is based on review and synthesis of three separate studies conducted in the project zone between 2005 and 2008 (within 5 kilometers to Kakamega Forest Reserve) called 'Community study in Forest Again Project Zone'. The validation team reviewed this document and found the methodologies used by two of the studies as described to be appropriate. The methods used include random sampling, interviews and questionnaire. Community demographics and other information are described across livelihood and other broad indicators such as population density, financial capital, ethnic history, human capital, physical capital, social and natural capital.

Conformance  
CAR/OBS

Yes  No  N/A

- 6) A description of current land use and customary and legal property rights including community property<sup>8</sup> in the project zone, identifying any ongoing or unresolved conflicts or disputes and identifying and describing any disputes over land tenure that were resolved during the last ten years (see also **G5**).

Findings

The Forest Again PDD describes the past and current land use and property rights within the project zone. The project area is described as being within the boundaries of the Kakamega National Forest where the land is owned by the State and managed as forest by the Kenya Forest Service (KFS). Grazing is mentioned as one of the current land use within the project area. The cultural importance of some areas has been well illustrated; an example given is the Tiriki clan's use of the southeastern portions of the forest for circumcision ceremonies.

<sup>5</sup> 'Communities' are defined as all groups of people—including Indigenous Peoples, mobile peoples and other local communities—who live within or adjacent to the project area as well as any groups that regularly visit the area and derive income, livelihood or cultural values from the area. (See Appendix B: Glossary for more information.)

<sup>6</sup> 'Indigenous Peoples' are defined as distinct, vulnerable, social and cultural groups whose members identify themselves as belonging to an indigenous cultural group. (See Appendix B: Glossary for more information.)

<sup>7</sup> Community characteristics may include shared history, culture, livelihood systems, relationships with one or more natural resources, or the customary institutions and rules governing the use of resources.

<sup>8</sup> Including lands that communities have traditionally owned, occupied or otherwise used or acquired.

Lands outside the forest boundary are indicated as being owned by individuals based on customary inheritance. The validation team visited the project zone and found the project area to lie within the boundaries of the Kakamega National Forest. The team also observed cattle grazing and fuel wood collection within the project zone. Lands outside the boundaries of the Kakamega Forest were found to be mainly being used for subsistence food crops cultivation. A sample of community members the validation team talked with could not identify any conflict or dispute over land tenure within the project zone.

Conformance  
CAR/OBS

Yes

No

N/A

### Biodiversity Information

- 7) A description of current biodiversity within the project zone (diversity of species and ecosystems<sup>9</sup>) and threats to that biodiversity, using appropriate methodologies, substantiated where possible with appropriate reference material.

#### Findings

The Forest Again PDD gives a general overview of biodiversity in the Kakamega Forest to include their uniqueness, together with threats to their maintenance, their benefits and describes the Kakamega Forest as the 3<sup>rd</sup> highest ranked forest in Kenya for conservation by the IUCN. Detailed numbers on the flora, invertebrates, reptiles, birds and mammals along with tabular summary of biodiversity taxa are also given. The information includes results of surveys done in Kakamega Forest indicating the presence of over 380 species of plants, 400 species of invertebrates, about 350 species of birds and mammals. These are plants and animals are mentioned as facing some degree of being endangered, near threatened or threatened as a result of forest fragmentation.

Fragmentation analysis (size, edge effects and key species analysis) along with references have been employed to highlight the threat to biodiversity in the project zone and the possible positive effects that the Forest Again reforestation project can have on biodiversity in the zone. The PDD contains a summary of this fragmentation analysis carried out by Forest Again. The project demonstrates high level of understanding of the biodiversity in the forest.

Conformance  
CAR/OBS

Yes

No

N/A

- 8) An evaluation of whether the project zone includes any of the following High Conservation Values (HCVs) and a description of the qualifying attributes:<sup>10</sup>

- 8.1. Globally, regionally or nationally significant concentrations of biodiversity values;
- a. protected areas<sup>11</sup>
  - b. threatened species<sup>12</sup>
  - c. endemic species<sup>13</sup>

<sup>9</sup> Equates to habitat types, biotic communities, ecoregions, etc.

<sup>10</sup> These high conservation value criteria are based on those defined by the High Conservation Value (HCV) Resource Network <http://hcvnetwork.org/>. Practical help is available for using HCVs in each region, including generic guidance documents (Toolkits) and Country Pages.

<sup>11</sup> Legally protected areas equivalent to IUCN Protected Area Management Categories I-VI (see [http://www.iucn.org/about/union/commissions/wcpa/wcpa\\_work/wcpa\\_strategic/wcpa\\_science/wcpa\\_categories/index.cfm](http://www.iucn.org/about/union/commissions/wcpa/wcpa_work/wcpa_strategic/wcpa_science/wcpa_categories/index.cfm) for definitions) as well as areas that have been proposed for protected area status by the relevant statutory body but have not yet been officially declared, and including areas protected under international conventions (e.g., Ramsar sites, World Heritage Sites, UNESCO Man-and-Biosphere Reserves, etc.).

<sup>12</sup> Species that qualify for the IUCN Red List threat categories of Critically Endangered (CR), Endangered (EN) and Vulnerable (VU). (See [www.iucnredlist.org](http://www.iucnredlist.org) and Appendix B: Glossary for more information.) Additional national or regional listings should also be used where these may differ from the IUCN Red List.

- d. areas that support significant concentrations of a species during any time in their lifecycle (e.g. migrations, feeding grounds, breeding areas).

Findings	<p>Though not specifically treated under evaluation of HCV and their qualifying attributes; the PDD gives a general overview of biodiversity in the project zone which more or less portrays Kakamega Forest as nationally significant concentration of endemic biodiversity values. The PDD describes the Kakamega Forest as blending Central Africa lowland and highland montane species due to its high elevation. Together with its island nature Kakamega Forest is believed to shows high levels of endemism of between 10%-20% of its species and as the only lowland rainforest remaining in Kenya.</p> <p>The PDD further mentions that the Kakamega Forest contains the headwaters for three main rivers in Western Kenya and one of the primary watersheds for Lake Victoria. Kakamega Forest is said to contain about 5,000 ha of three nature reserves protected by law. The PDD gives examples of many nationally rare or endemic species to include 60 species of orchids, 19 dragon flies, the Kaimosi Blind Snake, Gold's Cobra, the Angorge's Greenbul and Grey-Chested Illadopsis birds - all as endemic and the Goliath Beetle as rare, but can be found in the Kakamega Forest. Tables of endangered, near threatened, threatened and vulnerable species of birds and mammals are also given citing IUCN and CITIES sources. No indication is however given whether these are national or regional listings.</p>		
Conformance CAR/OBS	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

8.2. Globally, regionally or nationally significant large landscape-level areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance;

Findings	<p>No indication of this HCV is given in the PDD. The validation team also had no such information either from the documents reviewed or the interviews with stakeholders.</p>		
Conformance CAR/OBS	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

8.3. Threatened or rare ecosystems;<sup>14</sup>

Findings	<p>The fragmentation analysis carried out by Forest Again and its summary as contained in the PDD describes Kakamega Forest better as a threatened ecosystem. Discussion of results of the fragmentation analysis indicate that deforestation in Kakamega Forest since its reservation in 1933 has led to only 62.7% of the original forest remaining while the original single forest block now consist of three fragments as at 2001. Area to edge ratio has also reduced by 50% from the original 2.41 to 1.23. The study pointed out that these deteriorating trends affect ecosystem biodiversity negatively by reducing habitat areas, changing configuration of patches and movement of species between patches as well as increasing edge effects</p>		
Conformance CAR/OBS	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

8.4. Areas that provide critical ecosystem services (e.g., hydrological services, erosion control, fire control);

Findings
----------

<sup>13</sup> Species for which the entire global range is restricted to the site, the region or the country (the level of endemism must be defined).

<sup>14</sup> Includes ecosystems (intact or not) or associations of species that have always been rare, those which are now rare or greatly reduced, and those for which intact examples are very rare even if heavily disturbed or degraded.

Conformance CAR/OBS	Though not specifically treated under any HCV heading, the PDD mentions under various sections that the Kakamega Forest serves as the headwaters for three main rivers in Western Kenya and one of the primary watersheds for Lake Victoria.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
------------------------	--	---	-----------------------------	------------------------------

8.5. Areas that are fundamental for meeting the basic needs of local communities (e.g., for essential food, fuel, fodder, medicines or building materials without readily available alternatives); and

Findings	Though the PDD provides comprehensive list of medicinal plants and other uses from the Kakamega Forest, it does not give any indication that these are fundamental for meeting the basic needs without readily available alternatives for the adjoining communities. A sample of the community members the validation team talked with also did not give any indication to that effect.
Conformance CAR/OBS	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

8.6. Areas that are critical for the traditional cultural identity of communities (e.g., areas of cultural, ecological, economic or religious significance identified in collaboration with the communities).

Findings	The Forest Again PDD includes a sub-heading on 'Important Cultural Sites' It mentions that numerous areas within the project zone constitute important cultural sites for the KiLihya tribe. The southeastern portions of Kakamega forest was mentioned specifically as being used by the Tiriki clan for circumcision ceremonies.
Conformance CAR/OBS	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

## G2. Baseline Projections- Required

### Concept

**A baseline projection is a description of expected conditions in the project zone in the absence of project activities. The project impacts will be measured against this 'without-project' reference scenario.**

### Indicators

The project proponents must develop a defensible and well-documented "without-project" reference scenario that must:

- 1) Describe the most likely land-use scenario in the absence of the project following IPCC 2006 GL for AFOLU or a more robust and detailed methodology,<sup>15</sup> describing the range of potential land-use scenarios and the associated drivers of GHG emissions and justifying why the land-use scenario selected is most likely.

Findings	Forest Again cites published literature references based on historical land cover analysis to indicate that Kakamega Forest has lost around 30% of its original indigenous forest since it was gazetted in 1933. It further indicates that 15% of the indigenous forest (approx. 2,200ha) was lost between 1972 and 2000. Forest Again further cites publications in 2004 and 2006 to indicate that, though most of the large clearings have stopped, demand for timber and forest-related income continue to be high. More references are also cited to indicate that average equivalent income is low
----------	---

<sup>15</sup> In cases where a published methodology is used, the full reference must be given and any variations from the published methodology must be explained.

among project zone fringe communities, population is dense and growing, poverty levels are high, arable lands are less available, wood demand for cooking, building medicine and the use of forest to supplement income are high while current fuel wood harvest from the forest is also high.

Forest Again further cites references to point out that, trails entering the forest are greater than 10 per kilometer and cutting of tree branches occur along 97% of all such forest trails and over 150 charcoal making sites are estimated to exist within the Kakamega Forest. Though cutting of wood in the forest for poles, charcoal production or fuel wood are illegal and / or require permit, Forest Again cited a publication to allude to the inability of the KFS to enforce such requirements by the publication results that only 43 arrests per year were made on illegal wood collection between 2000 and 2003.

Forest Again buttresses its argument with reference to recent poverty assessment and remote-sensing publications conclusion that, 'given the current population density, land for farming in the project zone is not enough to provide for the income of the people to meet their basic needs'. Forest Again points out that under the prevailing conditions, the people will continue to turn to the forest for these needs, thus forest fragmentation and degradation are likely to continue.

The validation team visited part of the project zone, had interviews with sample of the people and saw evidence of dense forest trails, high population density, fuel wood collection and other forest uses by the fringe communities. One significant current land use which Forest Again did not include in its without project scenario land use analysis is the high levels of cattle grazing in the project zone as observed by the team.

Conformance  
CAR/OBS

Yes  No  N/A

- 2) Document that project benefits would not have occurred in the absence of the project, explaining how existing laws or regulations would likely affect land use and justifying that the benefits being claimed by the project are truly 'additional' and would be unlikely to occur without the project.<sup>16</sup>

Findings

Forest Again argues in its PDD, with reference to the baseline and projected degradation of the project area, that the Kenya Forest Service (KFS) which is charged with the management of the Kakamega Forest is constrained in terms of 'capacity' and funding to arrest and reverse the degradation at the project site without the project. Some KFS officials that the team talked with reiterated these concerns. The validation team also gathered that indeed the Forest Again project is voluntary and its implementation is not being mandated by any law or programme.

Visits by the validation team to the two proposed project sites revealed that some parts of the project areas are planted with *Cyprus*, *Eucalyptus* and other species. Planting ages varied between less than a year (Kisaini site) to one or more years. Responses from stakeholders that the team had interview with indicated that, the plantings in question were done by the KFS under its Greenzone programme with the World Bank and the KFS's own planting programme with the communities and also some by BIOTA. The aim of these planting is to reforest degraded parts of the Kakamega Forest. The people also mentioned a private company called PAN-PAPER as also carrying out planting within the area. Further interviews with KFS officials confirmed that the KSF is indeed planting trees at the project sites. The KFS indicated to have annual planting target of 100 ha a year subject to availability of funds to reforest the

<sup>16</sup> Project proponents must demonstrate that project activities would not have been implemented under business as usual due to significant financial, technological, institutional or capacity barriers. Actions implemented by the project must not be required by law, or project proponents must demonstrate that the pertinent laws are not being enforced. Project proponents must provide credible and well-documented analyses (e.g., poverty assessments, farming knowledge assessments, or remote sensing analysis) to demonstrate that the 'without project' reference scenario reflects land-use practices that are likely to continue or that otherwise differ from the land-use practices expected as a result of project activities.

whole degraded area in Kakamega Forest within the next 10 year. Consequently, 30 ha of the Kisaini site and approximately 70 ha of the Iloro site of the proposed Forest Again sites have been planted and the programme will continue. According to the KFS, the Forest Again project is only seen as a supplementary to what the KFS is currently doing.

Consistent with Forest Again's submission of the KFS's management capacity constrains to carry out reforestation of the project sites (in supporting of the projects additionality), other stakeholders that the team talked with revealed that the KFS had carried out planting activities three times in the same KFS's planted areas in question. Interviewees alluded that the repeated replanting was necessary as a result of repeated planting failure due to many KFS capacity factors. Forest Again indicated to the team that, most of the proposed project site already planted (where the plantation looked more than a year old at the Iloro site) would be excluded from the project area and declared as 'livelihood zones'. It however did not give any clue as to how other areas (both Kisaini and Iloro) with very young plantings are going to be treated with regard to meeting the additionality requirements of the CCBA Standards.

Besides, most stakeholders that the team talked with also indicated that a management plan for the Kakamega Forest is being prepared in line with the on-going reforms in forest management in Kenya. From email correspondence among stakeholders made available to the team, BIOTA is leading this Kakamega Forest Management Plan development process. This process will lead to zonation of the Kakamega Forest and elaboration of management prescription for the zones. Forest Again promised to make a copy or a draft version of this management plan to the team for review as part of the validation process; this is yet to be done. At this stage of the Management Plan development process, one cannot be sure as to what management prescription will be given to the proposed project sites which at this stage has no official endorsement from the KFS as custodian of Kakamega Forest.

Forest Again provided a revised PDD with additionality justification to include the already mentioned argument that the KFS's has inadequate human resources and financial capacity among weaknesses to reforest the proposed project sites without the intervention the Forest Again project. According to the revised PDD, the continued degraded state of the sites is partly the result of these constrains. The revised PDD also indicates that, the KFS plans to use indigenous tree species and that all the existing planting on the project site as indicated in the earlier findings would be removed.

Conformance  
CAR/OBS

Yes  No  N/A

**CAR 03/09:** Forest Again shall justify in the PDD to show that predicted project benefits would occur as a result of the implementation of the project's own reforestation activities and that reforestation of the degraded sites of the Kakamega forest would not have occurred without the Forest Again project or the project does not preempt what the KFS would have done under its current planting programme or management planning for the Kakamega Forest.

CAR 03/09 was closed on the basis of strong additionality justification made by Forest Again in the revised PDD and as described in the amended findings to section G2.2 above

- 3) Calculate the estimated carbon stock changes associated with the 'without project' reference scenario described above. This requires estimation of carbon stocks for each of the land-use classes of concern and a definition of the carbon pools included, among the classes defined in the IPCC 2006 GL for AFOLU.<sup>17</sup> The timeframe for this analysis can be either the project lifetime (see **G3**) or the project GHG

<sup>17</sup> Above-ground biomass, below-ground biomass, deadwood, litter, soils.

accounting period, whichever is more appropriate.<sup>18</sup> Estimate the net change in the emissions of non-CO<sub>2</sub> GHG emissions such as CH<sub>4</sub> and N<sub>2</sub>O in the 'without project' scenario. Non-CO<sub>2</sub> gases must be included if they are likely to account for more than 5% (in terms of CO<sub>2</sub>-equivalent) of the project's overall GHG impact over each monitoring period.<sup>19</sup>

Projects whose activities are designed to avoid GHG emissions (such as those reducing emissions from deforestation and forest degradation (REDD), avoiding conversion of non-forest land, or certain improved forest management projects) must include an analysis of the relevant drivers and rates of deforestation and/or degradation and a description and justification of the approaches, assumptions and data used to perform this analysis.<sup>20</sup> Regional-level estimates can be used at the project's planning stage as long as there is a commitment to evaluate locally-specific carbon stocks and to develop a project-specific spatial analysis of deforestation and/or degradation using an appropriately robust and detailed carbon accounting methodology before the start of the project.<sup>21</sup>

Findings

Forest Again indicates in its PDD that the project sites are within the degraded parts of the Kakamega Forest. Present vegetation cover in the proposed project area is described as mainly grassland and shrublands dominated by guava plants. The project therefore assumes a zero net carbon change 'without' project scenario within the project's accounting period of 40 years. Though the project plans to complete pre-project carbon stock estimation by May 2009, this has not been completed at the time of writing, and a 20 tCO<sub>2</sub>/ha figure has been assumed without justification for the project's net climate benefit calculations.(see CAR14/09) .

Visits by the validation team to the project sites confirmed that the project area is mainly dominated by grass and shrubby plants. However, some portions had been planted with eucalyptus and other plants which can have effect on the net carbon change in the 'without' project scenario (see finding in section G2.2). The team also observed and noted that the project area is being grazed by cattle. Though Forest Again indicates in the PDD that farmers in the project zone keep cattle of less than 10 animals per herd and further informed the team during the sites visits that a study carried out by the project indicated that an average of 24 herds of cattle of an average of 8 animals (an average of 192 cattle) graze the project sites per day. The validation team again observed and noted during the period of field visit that on daily basis, herds of cattle of over hundred animals each graze the Kisinai site of the project. Interview with sample of community members also indicated that, the population of cattle grazing the project area may be in the range of 4,000 to 5,000 animals.

Though Forest Again indicates that cattle grazing will be relocated to other sites, the validation team's interview with a sample of community members however revealed that, the relocation idea came already from the KFS as part of its management plan development for the Kakamega Forest. According to the community members, the KFS through the Forest Action Network (an organization) had already sensitized the communities about the relocation plan including other interventions such as zero grazing, depopulation of cattle and introduction of high yielding cattle breeds. This was also confirmed by KSF officials during interview with the validation team. Though the PDD does not say much about 'without project' net non-CO<sub>2</sub> emission from CH<sub>4</sub> and N<sub>2</sub>O or justify that this will account for < 5% (CO<sub>2</sub> equivalent) of the project's overall GHG impact over each monitoring period, on the basis of the confirmed relocation of grazing cattle by the KFS, it is expected that grazing will have no effect on 'without' project net non-CO<sub>2</sub> emissions.

Conformance

Yes

No

N/A

<sup>18</sup> In some cases, the project lifetime and the project GHG accounting period may be different.

<sup>19</sup> The following CDM Executive Board tool can be used to test the significance of emissions sources:

[http://cdm.unfccc.int/EB/031/eb31\\_repan16.pdf](http://cdm.unfccc.int/EB/031/eb31_repan16.pdf).

<sup>20</sup> The analysis may use a model that is based on historical rates and patterns of deforestation and degradation or predict the expected increases or decreases in deforestation and degradation.

<sup>21</sup> The 'start of the project' is defined as the start of implementation of activities that will directly cause the project's expected GHG emissions reductions or removals.



### G3. Project Design & Goals - Required

#### Concept

The project must be described in sufficient detail so that a third-party can adequately evaluate it.

**Projects must be designed to minimize risks to the expected climate, community and biodiversity benefits and to maintain those benefits beyond the life of the project. Effective local participation in project design and implementation is key to optimizing multiple benefits, equitably and sustainably. Projects that operate in a transparent manner build confidence with stakeholders and outside parties and enable them to contribute more effectively to the project.**

#### Indicators

The Project proponents must:

- 1) Provide a summary of the project's major climate, community and biodiversity objectives.

#### Findings

The Forest Again PDD clearly provides a summary of the project's main climate, community and biodiversity objectives to include: sequestration of carbon dioxide, increase in indigenous forest area and habitat, connection of forest islands through plantation corridors, biodiversity conservation of forest dependant species' and enhancement of the livelihoods of the local people.

Conformance

Yes

No

N/A

CAR/OBS

- 2) Describe each project activity with expected climate, community and biodiversity impacts and its relevance to achieving the project's objectives.

#### Findings

The Forest Again PDD has a sub-heading: 'summary of activities and benefits'. Under this sub-heading is a paragraph captioned 'Major Activities' which describes the project activities to include mostly the preparatory activities carried out to date. Though this paragraph lacks clear description of the overall main project activities, the sub-heading clearly articulates the climate, biodiversity and community benefits of the project and from here, one can have idea of the main project activities.

Conformance

Yes

No

N/A

CAR/OBS

- 3) Provide a map identifying the project location and boundaries of the project area(s), where the project activities will occur, of the project zone and of additional surrounding locations that are predicted to be impacted by project activities (e.g. through leakage).

#### Findings

The PDD provides different maps for the project zone, areas and surrounding communities, all within the Kakamega Forest. However, there is no a single map which clearly identifies the project location and boundaries, the project zone and the impacting surroundings. For example, where figure 5 shows the project zone, location and surrounding communities, it does not clearly show project area boundaries. Likewise, figures 3 and 7 show the project boundaries and location respectively but do not adequately show the project zone or the impacting surroundings. Though, Forest Again plans to relocate cattle currently grazing in the project area to other locations, these locations are not shown.

Amended findings:

The revised Forest Again PDD made available to the validation team contains new maps (figure 11a, 11b and 11c which identify the project location in terms of boundaries of project sites and zone as well as areas that the project is expected to impact. Though no single map was provided which captures these information, the arrangement of the three maps mentioned above make it possible for one to get a holistic view of project location and boundaries in terms of project sites, zone and impact areas.

Conformance  
CAR/OBS

Yes  No  N/A

**CAR 04/09:** Forest Again shall provide a map that clearly identifies the project location and boundaries of project sites, the project zone and any specific location predicted to be impacted by the project activities.

CAR 04/09 was closed on the basis of the action taken by Forest Again in providing maps as evidenced in the revised PDD and as described in the amended findings to section G3..3 above.

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

Findings

The carbon accounting period is clearly stated in the PDD as 40 years. Forest Again justifies this accounting period in terms of tropical forest productivity stabilization period and cites available publications references to support this argument. Further justification is made in terms of the carbon market opportunities in the US expected to be created by the 80% emission reduction policy goal envisioned by 2050. The project lifetime is also indicated to go beyond the carbon accounting period of 40 years. Forest Again tries to justify this on the basis of the forest remaining longer after the 40 year accounting period but not on any project activities beyond this period. The PDD does not define any project implementation plan to indicate key dates and milestones. Though the team received a community outreach programme document from KEEP (one of the key project collaborators) which included implementation schedule for the outreach programme up to August 2009. This is however, just a small part of the overall project activities within the next 40 years.

Amended findings:

Forest Again made available to the team a revised PDD which contains a project implementation schedule stretching between May 2008 and 2050. The schedule indeed defines project development dates and key milestones.

Conformance  
CAR/OBS

Yes  No  N/A

**CAR 05//09:** Forest Again shall define a project implementation schedule to include key project development dates and milestones.

CAR 05/09 was closed following the action taken by Forest Again as evidenced in the revised PDD and as described in the amended findings to section G3.4 above.

- 5) Identify likely natural and human-induced risks to the expected climate, community and biodiversity benefits during the project lifetime and outline measures adopted to mitigate these risks.

Findings

The Forest Again PDD identifies: reduced rainfall, cattle grazing, wood collection and organizational changes in Eco2librium and KEEP as the main natural and

anthropogenic risks to the climate, community and biodiversity benefits of the project. The document also clearly contains mitigation measures to reduce these identified risks. For reduced rainfall, Forest Again plans to carry out planting in two rainy seasons of April-May and October-November. It also mentions a planned active watering scheme for the first two years and possibly the first 5 years when necessary. In terms of cattle grazing, measure include, education and outreach programs to inform farmers of the project goals, relocation of cattle and the innovative ‘Green Rangers’ concept of using community individuals to protect planted trees for them to be paid based on number of surviving plants.

To reduce wood collection, free distribution of about 20,000 seedlings (10% of total seedling) to farmers within 5 km to the project the forest is also planned to encourage on-farm tree planting as well as production and dissemination energy efficient cooking stoves in the area. Members from 7 key stakeholder organization with long-term in interest in forest conservation namely: KFS, KEEP, CFA, NMK, BIOTA-East Africa, Moi University and Masinde Muliro University are also included in the PMT to reduce the risk of organizational changes in Eco2librium and KEEP. Most of the people that the validation team had interviewed collaborated identifying the risks of the project, outlining especially wood collection for making charcoal and cattle grazing.

Conformance  
CAR/OBS Yes  No  N/A

- 6) Demonstrate that the project design includes specific measures to ensure the maintenance or enhancement of the high conservation value attributes identified in **G1** consistent with the precautionary principle.<sup>22</sup>

Findings The Forest Again PDD clearly identifies HCVs (ref. G1 D) and the entire project is indeed to rooted in restoration and conservation of forest values and its attributes as contained in the project goals. Measures to enhance identifies and potential conservation value attributes consistence with the precautionary principles are scattered throughout the PDD. For example, though Forest Again is aware that little is known about flora and fauna in Kakamega Forest and the population status of the Great Blue Turaco is unknown, the project’s reforestation goal is to increase indigenous forest cover by establishing forest corridors which are likely to maintain the population of the species because they are known to require closed canopy and large areas.

Conformance  
CAR/OBS Yes  No  N/A

- 7) Describe the measures that will be taken to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime.

Findings Forest Again plans to help develop the capacity of KEEP (a key project partner organization), to carry out conservation and HIV health care education, promote alternative non-timber income ventures such as butterfly farming among others. Eco2librium LLC is also mentioned as working with the project to provide fresh water and micro-hydro power and supply of business loans to the project zone communities. The Forest Again project is also indicated as being part of a larger forest management discussions going on among stakeholders. Together with the current shift in the KFS’s forest management approach of involving community, Forest Again believes that these measures can provide and enhance the maintenance of the climate, community and biodiversity benefits of the project.

Conformance  
CAR/OBS Yes  No  N/A

<sup>22</sup> The ‘precautionary principle’ is defined in the Preamble to the *Convention on Biological Diversity* (1992): ‘[W]here there is a threat of **significant reduction** or loss of biological diversity, lack of full scientific certainty should not be used as a reason for postponing measures to avoid or minimize such a threat.’

CAR/OBS

- 8) Document and defend how communities and other stakeholders<sup>23</sup> potentially affected by the project activities have been identified and have been involved in project design through effective consultation,<sup>24</sup> particularly with a view to optimizing community and stakeholder benefits, respecting local customs and values and maintaining high conservation values. Project developers must document stakeholder dialogues and indicate if and how the project proposal was revised based on such input.<sup>25</sup> A plan must be developed to continue communication and consultation between project managers and all community groups about the project and its impacts to facilitate adaptive management throughout the life of the project.

Findings

The Forest Again PDD mentions a carbon off-set feasibility workshop that was organized in May 2008 as the first major consultation platform used by the project to reach out to stakeholders. This workshop is documented to have been sponsored by KEEP and Eco2librium. Forest Again indicates that potential stakeholders including community leaders were invited to this workshop and that the workshop outcome and subsequent work led to the development of the organizational structure for the project. 'Primary' stakeholders namely: KFS, forest conservation organizations, forest research and local universities were also identified and have a member each in the PMT. Forest Again indicates that, KEEP through its numerous programmes and relationship with the benefiting communities will continue with consultations.

The validation team's review of the workshop proceedings and interviews with a sample of stakeholders confirmed that this workshop actually took place. The workshop proceedings indicate that benefits from the project and pertinent questions from participants were addressed while roles among stakeholders were defined. The workshop proceedings document the way forward for the Forest Again project and pertinent issues which arose during deliberations. Sample of community members that the validation team had interviews with were all pretty aware of the project while others confirmed to have taken part in the workshop.

Conformance  
CAR/OBS

Yes  No  N/A

- 9) Describe what specific steps have been taken, and communications methods used, to publicize the CCBA public comment period<sup>26</sup> to communities and other stakeholders and to facilitate their submission of comments to CCBA. Project proponents must play an active role in distributing key project documents to affected communities and stakeholders and hold widely publicized information meetings in relevant local or regional languages.

<sup>23</sup> 'Other stakeholders' are defined as the main groups potentially affected by the project activities that are not living on or adjacent to the project site.

<sup>24</sup> Effective consultation requires project proponents to inform and engage broadly with all community groups and other stakeholders using socially and culturally appropriate methods. Consultations must be gender and inter-generationally inclusive and must be conducted at mutually agreed locations and through representatives who are designated by the communities themselves in accordance with their own procedures. Stakeholders affected by the project must have an opportunity to evaluate impacts and raise concerns about potential negative impacts, express desired outcomes and provide input on the project design, both before the project design is finalized and during implementation.

<sup>25</sup> In cases where it is unclear whether a project will be implemented or not, it is acceptable to start with a preliminary community consultation, provided there are plans for appropriate full engagement before the start of the project. Where conformance with the Standards is being applied to a project already under implementation, project proponents must either provide documentation of appropriate consultation during the project design phase or demonstrate how more recent consultations have been effective in evaluating community benefits and adapting project design and implementation to optimize community and stakeholder benefits and respect local customs.

<sup>26</sup> 'The CCBA public comment period' is the process whereby CCBA posts project documents that are under evaluation by an auditor for conformance with the Standards on [www.climate-standards.org](http://www.climate-standards.org) for at least 30 days with an invitation and link for public comments to which the auditor must respond in the audit report.

Findings

Conformance  
CAR/OBS

The Forest Again PDD mentions that the preparation of the document has been done in collaboration with all stakeholders, including their community representatives and that though, Eco2librium is writing the document; this has been through dialogue with all stakeholders. Though no specific steps or communication methods are indicated in the PDD as to how the CCBA public comment period was to be publicized to community and other stakeholders, some of the people that the validation team talked with were fully aware of this event and indeed the team received a comment from a local stakeholder through the CCBA. Forest Again however has made it clear in the PDD that the final document will be published in English and Swahili and will be made available to all stakeholders.

Yes  No  N/A

10) Formalize a clear process for handling unresolved conflicts and grievances that arise during project planning and implementation. The project design must include a process for hearing, responding to and resolving community and other stakeholder grievances within a reasonable time period. This grievance process must be publicized to communities and other stakeholders and must be managed by a third party or mediator to prevent any conflict of interest. Project management must attempt to resolve all reasonable grievances raised, and provide a written response to grievances within 30 days. Grievances and project responses must be documented.

Findings

Conformance  
CAR/OBS

The Forest Again PDD clearly states that, all conflicts will be heard, resolved and communicated by the PMT but will be reviewed by the Eco2librium and that conflicts/grievances from staff and communities will be brought to the PMT through the Field Director. It however states that specific grievances/conflict protocols will be developed by the PMT. This process however needs to be operational for handling grievances and unresolved conflicts during project planning and during implementation. The specific grievances/conflict protocols were however not ready as at the time of writing this report to meet the requirement of this standard

Amended findings:

Forest Again's revised PDD contains a detailed conflicts and grievances resolution protocols to cover within-project and the local communities. The protocols include processes for hearing, recording, responding to and storage of records. For within-project individuals, the process identifies ways of communicating these protocols to them but does not include how the process will be made public to the communities. The process also identifies 3<sup>rd</sup> party groups to be involved in the management of conflicts and grievances resolution so as to avoid conflict of interest.

Yes  No  N/A

**CAR 06/09:** Forest Again shall update its PDD to include clear formalized process of handling unresolved conflict and grievances that arise during project planning and implementation

CAR 06/09 was closed following the action taken by Forest Again as evidenced in the revised PDD and as described in the amended findings above.

An observation was raised (see OBS 03/09)

OBS 03/09: The Forest Again conflict and grievances resolution protocols should be publicized to the communities and the project should endeavour to do that.

11) Demonstrate that financial mechanisms adopted, including projected revenues from emissions reductions and other sources, are likely to provide an adequate flow of funds for project implementation and to achieve the anticipated climate, community and biodiversity benefits.

Findings

Forest Again uses projected carbon sales based on annual projected planting as the source of revenue for implementing the project. Forecast annual expenses are indicated as operating expenses and capacity building investment for KEEP to provide income generation projects for communities, bring clean water and electricity to villages, build schools and orphanages and to develop future projects. Based on these annual projected revenue and expenses, the project demonstrates a net positive cash flow for continued implementation of activities

Conformance  
CAR/OBS

Yes

No

N/A

## G4. Management Capacity and Best Practices - Required

### Concept

The success of a project depends upon the competence of the implementing management team. Projects that include a significant capacity-building (training, skill building, etc.) component are more likely to sustain the positive outcomes generated by the project and have them replicated elsewhere.

Best practices for project management include: local stakeholder employment, worker rights, worker safety and a clear process for handling grievances.

### Indicators

The project proponents must:

- 1) Identify a single project proponent which is responsible for the project's design and implementation. If multiple organizations or individuals are involved in the project's development and implementation the governance structure, roles and responsibilities of each of the organizations or individuals involved must also be described.

#### Findings

Forest Again identifies Eco2librium LLC as the single project proponent. It however indicates that, the project development and implementation will be carried out by other organizational partners namely; KEEP, KFS, NMK, BIOTA, CFA's among others. Roles and responsibilities and the governance structure are clearly documented in the PDD. The validation team met and had interview with the Executive Director of Eco2librium

Conformance  
CAR/OBS

Yes  No  N/A

- 2) Document key technical skills that will be required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills. Document the management team's expertise and prior experience implementing land management projects at the scale of this project. If relevant experience is lacking, the proponents must either demonstrate how other organizations will be partnered with to support the project or have a recruitment strategy to fill the gaps.

#### Findings

The Forest Again's PDD contains a table captioned 'PMT and Key Technical Skills'. The first column of the table has the heading 'skill/task' the list under which includes: community monitoring, biodiversity assessment among others. There is no doubt that the individuals and organizations assembled for the implementation of the project possess the requisite skills. However, as the heading depicts, the list in the first column of the table as mentioned above is more of task than technical skills. Corresponding To each item in the first column are the organizations or position responsible for each corresponding task./skills. The descriptions of the partnering organizations including, KEEP, the KFS, NMK, BIOTA, MOI University etc and specific individuals representing these organizations in the project are also clearly documented.

Conformance  
CAR/OBS

Yes  No  N/A

- 3) Include a plan to provide orientation and training for the project's employees and relevant people from the communities with an objective of building locally useful skills and knowledge to increase local participation in project implementation. These capacity building efforts should target a wide range of people in the communities, including minority and underrepresented groups. Identify how training will be passed on to new workers when there is staff turnover, so that local capacity will not be lost.

#### Findings

Forest Again indicates in its PDD that, forest conservation and community development knowledge and skills are already present among the staff of KEEP and the PMT. The

project will thus provide a platform for sharing and communicating this knowledge within the wider community. It indicates to build skills among Community Forest Associations, (CFAs) (which the project plans to work with) in tree nursery, income generation from sustainable use of forest resources and on-farm tree planting. It states that, the goal of KEEP, as a project partner is to build the capacity of the local communities in sustainable use of the forest to improve livelihood which are done through education and training. The project has indicated it will provide a mechanism to further this goal, though no concrete plan is provided.

Amended findings:

The revised Forest Again PDD contains a plan for recruiting, provision of orientation and training for a nursery coordinator and a field director for the nursery sub-component of the project. The plan also includes provision for training other nursery sub-component workers, anticipated and unanticipated staff vacancies as well as community forest associations.

Conformance  
CAR/OBS

Yes  No  N/A

**CAR 07/09:** Forest Again shall update its PDD to include a plan for giving orientation and training to project staff and other members of the community to meet the requirements of this standard..

CAR 07/09 was closed on the basis of the action taken by Forest Again as evidenced in the revised PDD and described in the amended findings to section 4.3 above

- 4) Show that people from the communities will be given an equal opportunity to fill all employment positions (including management) if the job requirements are met. Project proponents must explain how employees will be selected for positions and where relevant, must indicate how local community members, including women and other potentially underrepresented groups, will be given a fair chance to fill positions for which they can be trained.

Findings

Forest Again documents in its PDD that people from the local communities will be hired for all activities related to the project. Seedlings for planting will also be bought from CFAs. It further indicates that the PMT members will hold training workshops for each project subcomponent which will be specifically responsible for hiring suitable staff. Though Forest Again mentions in section GL2 of the PDD that the project will be hiring specifically from communities and households with the most need, no further explanation is given as to how each project subcomponent will use this 'most need' criterion in selecting employees from the local communities to meet the requirement of this standard. In terms of hiring of underrepresented groups, Forest Again indicates that, it already has three women on the PMT and KEEP. The validation team talked with all the three women on the PMT and some CFA members to confirm this information.

Amended findings:

Forest Again indicates in the revised PDD to post the position of subcomponent managers in local venues such as churches, schools and sub-chiefs' offices. The project clearly indicates that managers' selection requirements will be based on broader experiences in local skills and knowledge. Candidates adequacy in the local Kiluhya language is specifically mentioned as a key requirement for strengthening communication of the project and to ensure local participation. The project indicates to use the local structures of the councils and checked by the project's 'most need' survey results to facilitate selection of candidates.

Conformance CAR/OBS	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	<b>CAR 08/09</b> Forest Again shall explain how it will select employees for positions in the project.
	CAR 08/09 was closed on the basis of the action taken by Forest Again as evidenced in the PDD and described in the amended findings to section 4.4 above

- 5) Submit a list of all relevant laws and regulations covering worker's rights in the host country. Describe how the project will inform workers about their rights. Provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights<sup>27</sup> and, where relevant, demonstrate how compliance is achieved.

Findings	Forest Again made available to the validation team a list of relevant national laws and regulations to the project, and explains how the project meets them. This list however, did not include any relevant laws and regulations relating to workers' right in Kenya. Nevertheless, Forest Again promises in its PDD that the project will comply with all national and/or local labour laws and regulations and that the PMT will produce a document on workers right including mechanism to communicate these rights to workers and other stakeholders. It indicates it will use a workshop to share and communicate this information to all affected members prior to commencement of the project and once every year thereafter. See also findings in section G5.1
	Amended findings:
	The revised Forest Again PDD includes a comprehensive list of relevant Kenya laws on workers' rights, health and safety, employment among others. The list also includes relevant international regulations and treaties such as Convention on the Elimination of All Forms of Discrimination Against Women, International Convention on the Elimination of All Forms of Racial Discrimination, Freedom of Association : Workers Right to Organize and Collective Bargain among others. The PDD clearly indicates that, all project activities related to hiring and paying local people as well as worker rights will comply with these Kenya laws/local laws and international treaties and regulation

Conformance CAR/OBS	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	<b>CAR 09/09:</b> Forest Again shall update its list of relevant laws and regulations to include those covering workers' rights in Kenya and applicable international agreements and treaties
	CAR 09/09 was closed based on the action taken by Forest Again as evidenced in the revised PDD and described in the amended findings to section 4.5 above

- 6) Comprehensively assess situations and occupations that pose a substantial risk to worker safety. A plan must be in place to inform workers of risks and to explain how to minimize such risks. Where worker safety cannot be guaranteed, project proponents must show how the risks will be minimized using best work practices.

Findings	Forest Again promises in its PDD that the PMT will create a document to work safety issues and plans to avoid or reduce such risks to include training of key staff in first aid
----------	--

<sup>27</sup> 'Workers' are defined as people directly working on project activities in return for compensation (financial or otherwise), including employees, contracted workers, sub-contracted workers and community members that are paid to carry out project-related work.

administration. It plans to inform worker about this through workshops (ref. section G4, 5 above)

Amended findings:

The revised Forest Again PDD contains a summary result of occupational risk assessment that the project proponents indicates to have conducted. The results cover the task of travel, planting tasks, office work and the related risks as well as heir risk factors. Interestingly out of the 19 associated risks identified, none had a probability of less than one!. Eight (8) risks including electric shock, fire, building collapse, lightening among others have probability of 1 (sure to happen) while others such as insect bites, bruises, snake bite among other has probabilities values quoted either as 2 or 3!! The revised PDD also indicates that, the project is developing 'project worker manual' to include all work safety issues (on the basis of this safety assessment), methods to avoid/reduce risks as well as what workers can do in case of accidents and emergencies. The revised PDD also contains a 'Forest Again Risk Management' plan which indicates how workers will be informed of the project's risks management and related issues

Conformance  
CAR/OBS

Yes  No  N/A

**CAR 10/09:** Forest Again shall update its PDD to include the results of comprehensive occupational safety assessment and a plan to inform workers of indentified risks and how to reduce them.

CAR 10/09 was closed on the basis of the action taken by Forest Again as detailed in the revised PDD and described in the amended findings to section 4.6 above.

- 7) Document the financial health of the implementing organization(s) to demonstrate that financial resources budgeted will be adequate to implement the project.

Findings

Forest Again made available to the validation team a write up which included figures said to be bank balances for some of the partner organizations for the current and past few years, to demonstrate availability and adequacy of financial resource to implement the project. Forest Again told the team that, the project implementation partner organizations including, KFS, KEEP, NMK, MOI University among others are all credible NGOs, state or para-statal organizations with resources and programme lines in support of this project. Some representatives of these organizations that the validation team talked with indicated that, already their organizations have made available resources towards the project in terms of the time of their representatives. This write up however does not give reliable and adequate documentation of the financial health of the implementation organizations.

Amended findings:

The revised Forest Again PDD gives the project's actual and projected expenses and sources of income to cover project activities up to year one including income to cover the purchase of seedlings. Forest Again indicates to raise funds from the project's projected carbon revenues to finance implementation of project activities after year one. This budgeted income and expenditure are adequate to implement project activities

Conformance  
CAR/OBS

Yes  No  N/A

**CAR 11/09:** Forest Again shall have reliable documentation of financial health (e.g. audited financial statements, annual budgets) of implementing organizations to demonstrate the adequacy of financial resources for the implementation of the project.

CAR 11/09 was closed on the basis of additional information provided by the project as evidenced in the revised PDD and captured in the amended findings to section 4.7 above.

## G5. Legal Status and Property Rights - Required

### Concept

The project must be based on a solid legal framework (e.g., appropriate contracts are in place) and the project must satisfy applicable planning and regulatory requirements.

During the project design phase, the project proponents should communicate early on with relevant local, regional and national authorities in order to allow adequate time to earn necessary approvals. The project design should be sufficiently flexible to accommodate potential modifications that may arise as a result of this process.

In the event of unresolved disputes over tenure or use rights to land or resources in the project zone, the project should demonstrate how it will help to bring them to resolution so that there are no unresolved disputes by the start of the project.

### Indicators

Based on information about current property rights provided in G1, the project proponents must:

- 1) Submit a list of all relevant national and local laws<sup>28</sup> and regulations in the host country and all applicable international treaties and agreements. Provide assurance that the project will comply with these and, where relevant, demonstrate how compliance is achieved.

### Findings

Forest Again made available to the validation team a document with a list of relevant national laws and regulations. It also gives assurance in the PDD that the project will comply with these laws. The document also includes statements of how the project is meeting or intends to meet these laws and regulations. The list however does not include relevant international treaties and agreements such as the CBD among others (See CAR 09/09)

Amended findings:

The revised Forest Again PDD includes a comprehensive list of relevant Kenya laws on workers' rights, health and safety, employment among others. The list also includes relevant international regulations and treaties such as Convention on the Elimination of All Forms of Discrimination Against Women, International Convention on the Elimination of All Forms of Racial Discrimination, Freedom of Association : Workers Right to Organize and Collective Bargain among others. The PDD clearly indicates that, all project activities related to hiring and paying local people as well as worker rights will comply with these Kenya laws/local laws and international treaties and regulation

Conformance  
CAR/OBS

Yes

No

N/A

See **CAR 09/09** .

CAR 09/09 was closed based on the action taken by Forest Again as evidenced in the revised PDD and described in the amended findings to section above

<sup>28</sup> Local laws include all legal norms given by organisms of government whose jurisdiction is less than the national level, such as departmental, municipal and customary norms.

- 2) Document that the project has approval from the appropriate authorities, including the established formal and/or traditional authorities customarily required by the communities.

Findings

Forest Again states in its PDD that the project takes place within the Kakamega National Forest and that the KFS has given full support and rights to the project. The documentation of this full support and rights however was not available in the supporting document as indicated in the PDD. The validation team upon review of the Kenya Forest Act 2005, gathered among other requirements that, some activities such as the Forest Again project may require consent of the KFS board (e.g. subsection 44 (1)), Review of email communication trail among project key stakeholders made available to the validation team also confirmed that an approval is required from the KFS higher authorities. Some of the PMT members the team talked with indicated that the request for approval has been sent to the KFS higher authorities and a decision from the KFS board is expected soon.

Besides the required approval from the KFS, the validation team also follow up on a public comment it received from the CCBA regarding the need for the project to undergo EIA. The validation team reviewed the Kenya Environmental Management and Co-ordination Act #8 of 1999 and the Environmental (Impact and Audit) Regulation of 2003 and also had interviews with relevant stakeholders. Forestry related activities such as reforestation and afforestation are among those activities requiring EIA as listed under the Second Schedule of the EMC Act. Under the subsidiary legislation, - Environmental (Impact and Audit) Regulation 2003 as amended in 2007, a project must first submit its report to be evaluated. When it is determined at this stage that the project has no significant negative impact or sufficient mitigation measures have been disclosed, a license can be given. This was confirmed in an interview with some National Environmental Management Authority (NEMA) officials.

Forest Again however has not yet submitted its project report to the relevant authority and no license with respect to environmental impact has been given to the project. The team however gathered from interviews with a sample of community members that no customary approval requirement is needed from the communities.

Amended findings:

The revised Forest Again PDD made available to the validation team after the field visit includes supporting letter from the Western Conservancy of the KFS and similar letter from the the Western Provincial Director of NEMA to indicate that his agency has subjected the project proposal to scrutiny and satisfied that it will not need to go through EIA. The revised PDD also indicates that the Forest Again project is a collaboration with the NEMA and the project is expecting a letter of exemption from the NEMA Director.

While these letters from the provincial high authorities of the KFS and the NEMA can indeed demonstrate the approval of the project by these organizations, it would however, be appropriate for Forest Again to obtain such approvals in the forms consistent with the Kenya Forest Act 2005 (Consent of the KFS Board of Directors) and the EIA regulation (letter of exemption from the NEMA Director or the FORM 3).

Conformance  
CAR/OBS

Yes  No  N/A

**CAR 12/09:** Forest Again shall obtain documented approval from appropriate authorities to meet all project planning, implementation or regulatory requirements to include permit from the KFS and Environmental Impact License from the NEMA.

CAR 12/09 closed and an observation raised on the basis of additional information provided by Forest Again as evidenced in the revised PDD and described in the

amended findings in section G5.2 above.

OBS 04/09 Forest Again after receiving supporting letters from the Western Province Director of NEMA and the head of the KFS Western Conservancy should obtain documented approval (in the case of KFS the consent of the Board of Directors) and for the NEMA (exemption letter from the NEMA Director or the FORM 3) consistent with the respective policy and regulation

- 3) Demonstrate with documented consultations and agreements that the project will not encroach uninvited on private property, community property,<sup>29</sup> or government property and has obtained the free, prior, and informed consent of those whose rights will be affected by the project.<sup>30</sup>

Findings

Forest Again reiterates in the PDD that the project will occur in Kakamega National Forest which is a state property. It is in the process of obtaining the necessary approval (see findings in section G5, 2 above) from the KFS.

Conformance  
CAR/OBS

Yes  No  N/A

- 4) Demonstrate that the project does not require the involuntary relocation of people or of the activities important for the livelihoods and culture of the communities.<sup>31</sup> 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.<sup>32</sup>

Findings

Forest Again states clearly in its PDD that the project will not lead to relocation of people as the area is a national forest and uninhabited. The validation team up visits to the area can also confirm that people do not live in the project area hence there will be no relocation of people. The PDD however indicates that there will be relocation of grazing cattle from the project area. Cattle grazers may be doing it illegally or under license from the KFS and therefore the relocation exercise may not make provision for compensation. The validation team upon visits to the project observed and noted that, the project areas indeed are grazed by cattle which members in the community according to interviews with the validation team indicated that cattle rearing constitute a vital livelihood activity in the area.

The people further indicated that they are fully aware of the relocation idea as they have been sensitized by an organization called Forest Action Network on behalf of the KFS as part of the management plan preparation for the Kakamega Forest. The interview with the people did not show any signs of resistance as most of them have come to understand the situation. Some cattle owners however were not convinced with the proposed relocation interventions such as 'zero grazing, depopulation, and the introduction of high yield breeds citing various risk concerns. According to some of the farmers, the high yield breed needs more care and treatment which most of them have tried before but lost all of their stock due to their lack of knowledge on how to handle them and the high degree of care needed.

Conformance  
CAR/OBS

Yes  No  N/A

<sup>29</sup> Including lands that communities have traditionally owned, occupied or otherwise used or acquired.

<sup>30</sup> In conformance with the United Nations Declaration on the Rights of Indigenous Peoples.

<sup>31</sup> Restricting the evaluation to activities that comply with statutory laws or conform with customary rights. 'Customary rights' to lands and resources refers to patterns of long-standing community land and resource usage in accordance with Indigenous Peoples' and local communities' customary laws, values, customs, and traditions, including seasonal or cyclical use, rather than formal legal title to land and resources issued by the State.

<sup>32</sup> In conformance with the United Nations Declaration on the Rights of Indigenous Peoples.

- 5) Identify any illegal activities that could affect the project's climate, community or biodiversity impacts (e.g., logging) taking place in the project zone and describe how the project will help to reduce these activities so that project benefits are not derived from illegal activities.

Findings

The Forest Again PDD identifies cutting of tree branches, collection of deadwood among other forest resources for food and medicine. These activities are considered illegal when they are carried out without a permit from the KFS. The validation team's interview with a sample of community members also confirmed that illegal wood cutting for making charcoal and cattle grazing in the forest are common. The project proposes to give 10% of seedlings to local farmers to plant on their farms and also support KEEP's education on energy saving stoves (Upesi jiko) to conserve fuel and alternative non-timber use livelihood programmes such as, butterfly farming among others to reduce these activities. A community member who is currently engaged in essential oil extraction employment as a non-timber business did confess to the team that before his current employment, he was an illegal charcoal maker within the Kakamega forest. Such living testimonies indeed give solid indication to the potential effectiveness and positive of Forest Again's proposed non-timber livelihood activities.

Conformance  
CAR/OBS

Yes  No  N/A

- 6) Demonstrate that the project proponents have clear, uncontested title to the carbon rights, or provide legal documentation demonstrating that the project is undertaken on behalf of the carbon owners with their full consent. Where local or national conditions preclude clear title to the carbon rights at the time of validation against the Standards, the project proponents must provide evidence that their ownership of carbon rights is likely to be established before they enter into any transactions concerning the project's carbon assets.

Findings

Forest Again states in the PDD that the project proponents, Eco2librium LLC, are developing the project on behalf of the KFS. It indicates that the KFS has given full consent for Eco2librium and Forest Again to develop the project its behalf. The legal documentation to prove this could not be found in the supporting documents to the PDD as indicated by Forest Again or made available to the validation team during the field visit.

Amended findings:

Forest Again made available to the validation team after the site visit a draft version of a Memorandum of Understanding (MoU) which is expected to be signed between the KFS and KEEP. Among the 'cooperative activities' to be undertaken between the parties are the development of carbon projects which are supposed to benefit local communities. This MoU has not yet been signed. The project proponents and other members of the PMT also have kept the validation team updated on progress on this matter to indicate that the project expects to conclude this agreement with the KFS soon. It is expected therefore that this MoU giving the rights to KEEP to develop the Forest Again carbon project will be concluded before any transaction on the project's carbon assets.

Conformance  
CAR/OBS

Yes  No  N/A

**CAR 13/09:** Forest Again shall provide legal documentation to demonstrate that it is developing the project on behalf of the KFS as indicated in its PDD.

CAR 13/09 Closed on the basis of the actions taken by Forest Again.

An observation was raised (see OBS 05/09)

OBS 05/09: Forest Again should ensure that all agreements leading to granting of carbon rights to the project has been established before any transaction on the project's carbon assets.

# CLIMATE SECTION

## CL1. Net Positive Climate Impacts - Required

### Concept

*The project must generate net positive impacts on atmospheric concentrations of greenhouse gases (GHGs) over the project lifetime from land use changes within the project boundaries.*

### Indicators

The project proponents must:

- 1) Estimate the net change in carbon stocks due to the project activities using the methods of calculation, formulae and default values of the IPCC 2006 GL for AFOLU or using a more robust and detailed methodology.<sup>33</sup> The net change is equal to carbon stock changes *with* the project minus carbon stock changes *without* the project (the latter having been estimated in **G2**). This estimate must be based on clearly defined and defensible assumptions about how project activities will alter GHG emissions or carbon stocks over the duration of the project or the project GHG accounting period.

### Findings

Forest Again estimates the project's net carbon stock change based on estimation of carbon stock from a matured closed indigenous forest near the project area as a proxy for 'with' project carbon stock and a 20 tCO<sub>2</sub>/ha pre-project carbon stock assumption under zero net carbon change 'without' project scenario. Though Forest Again makes no justification for the use of the 20 tCO<sub>2</sub>/ha pre-project carbon stock assumption, it has promised to complete measurement of pre-project carbon stocks within the project area in May 2009 (see **CAR 02/09**).

The Forest Again PDD in section G3.2 references a study by Glenday that quantified the carbon stocks (above-ground and below-ground) in mature (<20y old) indigenous Kakamega forest as a reference to check their own findings against. The value presented of 914 t CO<sub>2</sub> ha<sup>-1</sup> presented in the PDD was consistent with the findings in the Glenday (2006) article.

There do however seem to be some internal discrepancies with the number presented. The Appendix, 'Estimation of Reference Forest Carbon Stocks', (and PDD Table 14, page 39) that presents the findings of a new study reports carbon stocks of 248.7 +/- 21.5 t C ha<sup>-1</sup>. Converted to CO<sub>2</sub> (multiplied by 44/12) this is 911.9 +/- 78.8 t CO<sub>2</sub> ha<sup>-1</sup>. However, on page 40 of the PD, another table labeled 14, uses 912.8 t CO<sub>2</sub> ha<sup>-1</sup> as the reference forest value. It is not clear therefore, where this number was sourced from. It also appears the lower bound of the confidence interval has not been used for the carbon sequestration potential estimation

The validation team reviewed the field data for the reference forest carbon estimation and visited a sample of the reference forest sites. It is the opinion of the validation team that Forest Again employed the right sampling methods and data analysis is generally transparent. In calculating tree biomass and expansion to hectare for trees >160cm in plots such as A35a, A14e among others, the team noted that for the biomass Forest Again used an inappropriate formula (Brown 2002) under the situation and was not transparent with the expansion to hectare formula used; though the final answers are correct. The team also noted that estimation of reference forest deadwood biomass assumed 5% of the total above and below ground biomass. Forest Again has not justified this assumption.

<sup>33</sup> In cases where a published methodology is used, the full reference must be given and any variations from the published methodology must be explained.

Amended findings:

The revised PDD made available to the validation team includes updated project net GHG removals. This includes field estimate of baseline carbon stocks at the Kisaian project site and justification for the use of the 5% combined above and below ground wood biomass to estimate deadwood biomass. In the estimation of the above-ground biomass and with all other estimates, Forest Again did not use the lower bound confidence level values to remain conservative in its estimates.

Conformance  
CAR/OBS

Yes

No

N/A

**CAR 14/09:** Forest Again shall update its reference forest carbon data to be more transparent and consistent with the methodology used; justify the 912.8 t CO<sub>2</sub> ha<sup>-1</sup> reference forest value and the 20 tCO<sub>2</sub>/ha pre-project carbon stock assumption and the assumption that, referenced forest deadwood biomass is based on 5% of the combined above and below ground biomass.

**OBS 06/09:** Forest Again should use the lower bound confidence interval values in the estimate of its carbon values so as to remain conservative

- 2) Estimate the net change in the emissions of non-CO<sub>2</sub> GHG emissions such as CH<sub>4</sub> and N<sub>2</sub>O in the *with* and *without* project scenarios if those gases are likely to account for more than a 5% increase or decrease (in terms of CO<sub>2</sub>-equivalent) of the project's overall GHG emissions reductions or removals over each monitoring period.

Findings

Forest Again indicates in its PDD not to use burning for land preparation or fertilization of planted trees. It proposes to use less land disturbing methods in most of the field activities and therefore expects non-CO<sub>2</sub> emission from soil carbon to be less than 0.5%. One non-CO<sub>2</sub> emission source from the project area not yet considered is methane from grazing cattle. Forest Again indicates in the PDD that farmers in the area usually keep less than 10 cows and told the validation team that their study indicates that an average of 24 herds of cattle of an average of 8 animals (an average of 98 cattle) graze the project sites per day. The validation team's observation and interview with sample of community members indicate that, the population of cattle grazing the project area may be in the range of 4,000 to 5,000 animals and the team also observed separate herds of more than 100 animals per herd. This may constitute a significant source of methane emission. Forest Again indicates that the animals will be relocated, which in itself could be a source of leakage by activity displacement.

The validation team's interview with a sample of community members however revealed that, the relocation idea had been considered by the KFS as part of its management plan development for the Kakamega Forest. According to the members, the KFS through the Forest Action Network had already sensitized the communities about the relocation plan including other interventions such as zero grazing, depopulation and introduction of high yielding breed cattle. These ideas according to community members pre-date the Forest Again project. On this basis, it is the opinion of the validation team that, though cattle could have been a significant source of non-CO<sub>2</sub> emission in both 'with' and 'without' project situations, the issue can be considered as independent of the Forest Again project. **See CAR 03/09**

Conformance  
CAR/OBS

Yes

No

N/A

- 3) Estimate any other GHG emissions resulting from project activities. Emissions sources include, but are not limited to, emissions from biomass burning during site preparation, emissions from fossil fuel

combustion,<sup>34</sup> direct emissions from the use of synthetic fertilizers,<sup>35</sup> and emissions from the decomposition of N-fixing species.

Findings	Forest Again plans to employ non high disturbance methods during land preparation among other low impact activities See CL1, 2. The energy use on the project site comes from carbon free renewable sources. The project has also estimates GHG emission from project activities outside the project area (transportation) over the life of the project. These emissions are considered correctly as leakage as they occur outside the project site.		
Conformance CAR/OBS	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

- 4) Demonstrate that the net climate impact of the project is positive. The net climate impact of the project is the net change in carbon stocks plus net change in non-CO<sub>2</sub> GHGs where appropriate minus any other GHG emissions resulting from project activities minus any likely project-related unmitigated negative offsite climate impacts (see CL2.3).

Findings	The project clearly demonstrates in its PDD to produce a net positive climate impact of 422,003 tCO <sub>2</sub> from the estimate of its net GHG removal of 422,295 tCO <sub>2</sub> less project activities leakage of 292 tCO <sub>2</sub> .		
Conformance CAR/OBS	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

- 5) Specify how double counting of GHG emissions reductions or removals will be avoided, particularly for offsets sold on the voluntary market and generated in a country with an emissions cap.

Findings	Forest Again promises to work through accredited carbon traders such as the Carbonfund organization to register and trade in carbon credits generated. Accredited carbon traders have various mechanisms for avoiding double counting (e.g. from national level CDM among others) including verifications requirements for disclosure among other measures		
Conformance CAR/OBS	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

## CL2. Offsite Climate Impacts (“Leakage”) - Required

### Concept

The project proponents must quantify and mitigate increased GHG emissions that occur beyond the project area and are caused by project activities (commonly referred to as ‘leakage’).

### Indicators

The project proponents must:

- 1) Determine the types of leakage<sup>36</sup> that are expected and estimate potential offsite increases in GHGs (increases in emissions or decreases in sequestration) due to project activities. Where relevant, define and justify where leakage is most likely to take place.

<sup>34</sup> The following CDM Executive Board tool can be used to quantify these emissions:  
[http://cdm.unfccc.int/EB/033/eb33\\_repan14.pdf](http://cdm.unfccc.int/EB/033/eb33_repan14.pdf)

<sup>35</sup> The following CDM Executive Board tool can be used to quantify these emissions:  
[http://cdm.unfccc.int/EB/033/eb33\\_repan16.pdf](http://cdm.unfccc.int/EB/033/eb33_repan16.pdf)

<sup>36</sup> Offsite changes in GHG emissions can result from a variety of causes including:

- activity shifting or displacement;
- market effects (particularly when timber harvest volumes are reduced by the project);



Conformance  
CAR/OBS

Yes

No

N/A

### CL3. Climate Impact Monitoring - Required

#### Concept

Before a project begins, the project proponents must have an initial monitoring plan in place to quantify and document changes (within and outside the project boundaries) in project-related carbon pools, project emissions, and non-CO<sub>2</sub> GHG emissions if appropriate. The monitoring plan must identify the types of measurements, the sampling method, and the frequency of measurement.

Since developing a full monitoring plan can be costly, it is accepted that some of the plan details may not be fully defined at the design stage, when projects are being validated against the Standards. This is acceptable as long as there is an explicit commitment to develop and implement a monitoring plan.

#### Indicators

The project proponents must:

- 1) Develop an initial plan for selecting carbon pools and non-CO<sub>2</sub> GHGs to be monitored, and determine the frequency of monitoring. Potential pools include aboveground biomass, litter, dead wood, belowground biomass, wood products, soil carbon and peat. Pools to monitor must include any pools expected to decrease as a result of project activities, including those in the region outside the project boundaries resulting from all types of leakage identified in CL2. A plan must be in place to continue leakage monitoring for at least five years after all activity displacement or other leakage causing activity has taken place. Individual GHG sources may be considered 'insignificant' and do not have to be accounted for if *together* such omitted decreases in carbon pools and increases in GHG emissions amount to less than 5% of the total CO<sub>2</sub>-equivalent benefits generated by the project.<sup>37</sup> Non-CO<sub>2</sub> gases must be included if they are likely to account for more than 5% (in terms of CO<sub>2</sub>-equivalent) of the project's overall GHG impact over each monitoring period. Direct field measurements using scientifically robust sampling must be used to measure more significant elements of the project's carbon stocks. Other data must be suitable to the project site and specific forest type.

#### Findings

Forest Again provides in the PDD an initial monitoring plan to include monitoring responsibility, selection of carbon pools, frequency and the means of measuring these pools as well as a decision on non-CO<sub>2</sub> GHG. With regards to monitoring responsibility, it mentions Eco2librium and PMT members in charge of research/monitoring namely: MMU, NMK and MOI University. Above ground and below ground carbon are selected as the carbon pools to be monitored. Monitoring of these carbon pools is indicated to be measure by the establishment of about 50 permanent sample plots throughout the project sites using standard methods. Measurement frequency is indicated to be every 5 years.

The project in its initial plan, decided not to monitor non-CO<sub>2</sub> GHG. Forest Again cites a publication to support its plan not to include non-CO<sub>2</sub> GHG change in the projects climate impact monitoring because they are anticipated to be '< 15% from project activities'. Although Forest Again has not carried out any test on the significance of non-CO<sub>2</sub> sources on its project activities, the 15% threshold as indicated in the PDD does not meet the requirements of the CCBA standard which puts the threshold at < 5% (CO<sub>2</sub> equivalent) of the projects overall GHG impact over each monitoring period.

Amended findings

<sup>37</sup> The following CDM Executive Board tool can be used to test the significance of emissions sources:  
[http://cdm.unfccc.int/EB/031/eb31\\_repan16.pdf](http://cdm.unfccc.int/EB/031/eb31_repan16.pdf)



## COMMUNITY SECTION

### CM1. Net Positive Community Impacts - Required

#### Concept

The project must generate net positive impacts on the social and economic well-being of communities and ensure that costs and benefits are equitably shared among community members and constituent groups during the project lifetime.

Projects must maintain or enhance the High Conservation Values (identified in G1) in the project zone that are of particular importance to the communities' well-being.

#### Indicators

The project proponents must:

- 1) Use appropriate methodologies<sup>38</sup> to estimate the impacts on communities, including all constituent socio-economic or cultural groups such as indigenous peoples (defined in G1), resulting from planned project activities. A credible estimate of impacts must include changes in community well-being due to project activities and an evaluation of the impacts by the affected groups. This estimate must be based on clearly defined and defensible assumptions about how project activities will alter social and economic well-being<sup>39</sup>, including potential impacts of changes in natural resources and ecosystem services identified as important by the communities (including water and soil resources), over the duration of the project. The 'with project' scenario must then be compared with the 'without project' scenario of social and economic well-being in the absence of the project (completed in G2). The difference (i.e., the community benefit) must be positive for all community groups.

#### Findings

The Forest Again PDD provides good baseline livelihood indicator variables for communities within the project zone to include specific variable under broad livelihood assets of financial, human, natural resource, social and physical. The PDD also provides various 'with project' interventions considered potent to bring net positive impact on communities' livelihoods. These interventions include over 100 full and part-time jobs with salaries to average more than twice the current community average annual income of US\$308; purchase of seedling for the project from Community Forest Associations, supply of 10% of project seedling free to community member to plant on their farmers in order to reduce the time spend looking for firewood and the pressure on the surrounding forest ecosystem, promotion of energy efficient stoves and capacity building in non-farm income projects.

Beyond this point, the PDD does not estimate the impact of the project on the communities (within 5km of project site) based on planned project activities using suitable methodologies.

Amended findings:

Forest Again under the revised PDD indicates to have made use of the Sustainable Livelihood Framework (SLF) to assess baseline livelihood assets of the local communities to conclude that these assets namely: human capital, social capital, physical capital, natural capital and financial capital are already small within the communities. It uses the results of other referenced studies to indicate that these livelihood assets are likely to decrease without the project. It then uses the planned project activities to show that implementation of project activities will results in net positive impact on all the five livelihood assets within the local communities.

<sup>38</sup> See Appendix A of CCB Standard "Potential Tools and Strategies".

<sup>39</sup> Restricting the evaluation to well-being based on activities that comply with statutory laws or conform with customary rights.

Conformance CAR/OBS	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<b>CAR 16/09:</b> Forest Again shall estimate the impact of the project on the defined community based on the project's planned activities using appropriate methodologies			
CAR 16/09 closed on the basis of the action taken by Forest Again as evidenced in the revised PDD and as described in the amended findings to section CM1.1 above			

- 2) Demonstrate that no High Conservation Values identified in **G1.8.4-6**<sup>40</sup> will be negatively affected by the project.

Findings	Forest Again includes all identified HCVs in the PDD, including areas used for circumcision ceremonies of the Tiriki clan of the KiLuhya tribe, other important cultural trees, the watershed for the Yala river among other specific species and habitats. Forest Again indicates that the whole project idea is rooted in enhancing the conservation status of the Kakamega Forest through reforestation for establishing corridors to connect the different forest fragments. The increased forest area and other key indicators such as perimeter area ratio are expected to enhance the conservation of identified and potential HCVs.		
Conformance CAR/OBS	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

## CM2. Offsite Community Impacts - Required

### Concept

The project proponents must evaluate and mitigate any possible social and economic impacts that could result in the decreased social and economic well-being of the main stakeholders living outside the project zone resulting from project activities. Project activities should at least 'do no harm' to the well-being of offsite stakeholders<sup>41</sup>.

### Indicators

The project proponents must:

- 1) Identify any potential negative offsite stakeholder impacts that the project activities are likely to cause.

Findings	Forest Again PDD mentions displacement of cattle grazing as the only identified potential negative offsite impact that the project is likely to cause to the identified community. As indicated in section G3.3, interviews with sample of the community indicated that the plan to relocate their grazing cattle from the Kakamega Forest predates the Forest Again project as part of the management plan development for the Kakamega Forest and could go on with or without the project.		
Conformance CAR/OBS	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

- 2) Describe how the project plans to mitigate these negative offsite social and economic impacts.

Findings	Indeed the relocation of cattle grazing is the only negative impact on the community
----------	--

<sup>40</sup> **G1.8.4** Areas that provide critical ecosystem services (e.g., hydrological services, erosion control, fire control); **G1.8.5** Areas that are fundamental for the livelihoods of local communities (e.g., for essential food, fuel, fodder, medicines, or building materials without readily available alternatives); and, **G1.8.6** Areas that are critical for the traditional cultural identity of communities (e.g., areas of cultural, ecological, economic or religious significance identified in collaboration with the communities).

Note that High Conservation Values G1.8.1-3 that are more related to biodiversity conservation are covered in B1.

<sup>41</sup> Restricting the evaluation to well-being based on activities that comply with statutory or conform with customary rights.

Conformance CAR/OBS	identified so far. From interviews the validation team had with a sample of the community, the KFS has already proposed to assist farmers to depopulate their herds of cattle, promote zero grazing and also introduce high yield breeds as the mitigation measures for the relocation exercise.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
------------------------	--	---	-----------------------------	------------------------------

- 3) Demonstrate that the project is not likely to result in net negative impacts on the well-being of other stakeholder groups.

Findings	Forest Again clearly indicates in its PDD that it going to plant only indigenous plant species without any introduction of exotics or genetically modifies organisms. The PDD clearly documents the projects commitment to complying with all relevant national and local laws. Together with all the clearly indicated educational and empowerment interventions planned by the project which go beyond the immediate communities/stakeholders of the project, it is anticipated that the project will rather have a net positive impact beyond its immediate stakeholders
Conformance CAR/OBS	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

### CM3. Community Impact Monitoring - Required

#### Concept

The project proponents must have an initial monitoring plan to quantify and document changes in social and economic well-being resulting from the project activities (for communities and other stakeholders). The monitoring plan must indicate which communities and other stakeholders will be monitored, and identify the types of measurements, the sampling method, and the frequency of measurement.

Since developing a full community monitoring plan can be costly, it is accepted that some of the plan details may not be fully defined at the design stage, when projects are being validated against the Standards. This is acceptable as long as there is an explicit commitment to develop and implement a monitoring plan.

#### Indicators

The project proponents must:

- 1) Develop an initial plan for selecting community variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project's community development objectives and to anticipated impacts (positive and negative).<sup>42</sup>

Findings	Forest Again provides a list of selected livelihood variables to cover broad area including education, economic, health and well being to be monitored as part of its monitoring plan. The anticipated monitoring frequency has been said to range between 2 and 5 years. It indicates that the PMT is currently developing the plan to collect community data and that the monitoring will be coordinated by a Research Coordinator and overseen by a faculty member from Masinde Muliro University.
Conformance CAR/OBS	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

<sup>42</sup> Potential variables may include but are not limited to: income, employment generation, health, market access, schools, food security and education.

- 2) Develop an initial plan for how they will assess the effectiveness of measures used to maintain or enhance High Conservation Values related to community well-being (G1.8.4-6) present in the project zone.

Findings	Forest Again indicates in the PDD that, all monitoring plans will include monitoring of HCV variables.		
Conformance CAR/OBS	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

- 3) Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.

Findings	Forest Again clearly indicates in its PDD to fully develop and start the implementing its community monitoring plan by December 2009.		
Conformance CAR/OBS	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

## BIODIVERSITY SECTION

### B1. Net Positive Biodiversity Impacts - Required

#### Concept

The project must generate net positive impacts on biodiversity within the project zone and within the project lifetime, measured against the baseline conditions.

The project should maintain or enhance any High Conservation Values (identified in G1) present in the project zone that are of importance in conserving globally, regionally or nationally significant biodiversity.

Invasive species populations<sup>43</sup> must not increase as a result of the project, either through direct use or indirectly as a result of project activities.

Projects may not use genetically modified organisms (GMOs)<sup>44</sup> to generate GHG emissions reductions or removals. GMOs raise unresolved ethical, scientific and socio-economic issues. For example, some GMO attributes may result in invasive genes or species.

#### Indicators

The project proponents must:

- 1) Use appropriate methodologies<sup>45</sup> to estimate changes in biodiversity as a result of the project in the project zone and in the project lifetime. This estimate must be based on clearly defined and defensible assumptions. The 'with project' scenario should then be compared with the baseline 'without project' biodiversity scenario completed in G2. The difference (i.e., the net biodiversity benefit) must be positive.

Findings	Though not detailed in the PDD, but well documented as part of the studies for this project, Forest Again in its 'Fragmentation Study' uses the 'Landscape Metric Analysis
----------	--

<sup>43</sup> 'Invasive species' are defined as non-native species that threaten ecosystems, habitats or species in the project zone as identified in the Global Invasive Species Database: <http://www.issg.org/database>, from scientific literature, and from local knowledge.

<sup>44</sup> 'Genetically modified organisms' are defined as any living organism that possesses a novel combination of genetic material obtained through the use of modern biotechnology and which is capable of transferring or replicating genetic material.

<sup>45</sup> See Appendix A of CCB Standard "Potential Tools and Strategies" for further guidance.

methodology to show that landscape indicators such as: 'fragment size and isolation' as related to the time that it take for a given population to loss half of this population through extinction and based on different scenarios predicts that the Forest Again reforestation project can save between 4 to 6 bird species out of the estimated current 42 species in the Yala forest fragment from extinction. Other methods such as habitat analysis for forest dependant species have been employed to estimate the positive change in biodiversity in the project zone as a result of the project activities

Conformance  
CAR/OBS Yes  No  N/A

- 2) Demonstrate that no High Conservation Values identified in **G1.8.1-3**<sup>46</sup> will be negatively affected by the project.

Findings

Forest Again indicates to use only indigenous non-invasive plant species for its reforestation project and no genetically modified organisms will be introduced into the area as part of this project activities. It proposes active and rigorous management of seedling cohorts and project sites to prevent inadvertent invasion of non-native species and or diseases

Conformance  
CAR/OBS Yes  No  N/A

- 3) Identify all species to be used by the project and show that no known invasive species will be introduced into any area affected by the project and that the population of any invasive species will not increase as a result of the project.

Findings

Forest Again's PDD includes a list of plant species to be used in the project's reforestation activities. These are known indigenous species and none of them are currently known to be invasive.

Conformance  
CAR/OBS Yes  No  N/A

- 4) Describe possible adverse effects of non-native species used by the project on the region's environment, including impacts on native species and disease introduction or facilitation. Project proponents must justify any use of non-native species over native species.

Findings

The project plans to use no non-native species and has clearly indicated this in its PDD.

Conformance  
CAR/OBS Yes  No  N/A

- 5) Guarantee that no GMOs will be used to generate GHG emissions reductions or removals.

Findings

Forest Again clearly states in its PDD that no GMOs will be used.

Conformance Yes  No  N/A

<sup>46</sup> **G1.8.1** Globally, regionally or nationally significant concentrations of biodiversity values, including protected areas, threatened species, endemic species and areas that support significant concentrations of a species during any time in their lifecycle(e.g., migrations, feeding grounds, breeding areas);  
**G1.8.2** Globally, regionally or nationally significant large landscape-level areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance;  
**G1.8.3** Threatened or rare ecosystems.

Note that High Conservation Values G1.8.4-6 that are more related to community well-being are covered in CM1.

## B2. Offsite Biodiversity Impacts - Required

### Concept

The project proponents must evaluate and mitigate likely negative impacts on biodiversity outside the project zone resulting from project activities.

### Indicators

The project proponents must:

- 1) Identify potential negative offsite biodiversity impacts that the project is likely to cause.

#### Findings

Forest Again identifies displacement of the surrounding communities' use of biodiversity resources to other part of the forest outside the project as the potential off-site negative impact from project activities.

Conformance  
CAR/OBS

Yes

No

N/A

- 2) Describe how the project plans to mitigate these negative offsite biodiversity impacts.

#### Findings

Forest Again proposes to use conservation education, capacity building in alternative income ventures such as butterfly farming, supply of 10% of all seedling produced from the project free to communities to plant on their lands among others as the mitigation measure again the identifies possible offsite negative biodiversity impact in section B2.1 above.

Conformance  
CAR/OBS

Yes

No

N/A

- 3) Evaluate likely unmitigated negative offsite biodiversity impacts against the biodiversity benefits of the project within the project boundaries. Justify and demonstrate that the net effect of the project on biodiversity is positive.

#### Findings

The Forest Again PDD gives details of the project's forest conservation objectives. On the basis of the identified offsite negative impact and the comprehensive mitigation measured lined up to deal with it and the numerous project biodiversity benefits as detailed in the PDD, one can consider the overall design as robust enough to result in overall project net positive biodiversity effect against any possible unmitigated offsite negative biodiversity impact not yet identified.

Conformance  
CAR/OBS

Yes

No

N/A

## B3. Biodiversity Impact Monitoring - Required

### Concept

The project proponents must have an initial monitoring plan to quantify and document the changes in biodiversity resulting from the project activities (within and outside the project boundaries). The monitoring plan must identify the types of measurements, the sampling method, and the frequency of measurement.

Since developing a full biodiversity-monitoring plan can be costly, it is accepted that some of the plan details may not be fully defined at the design stage, when projects are being validated against the Standards. This is acceptable as long as there is an explicit commitment to develop and implement a monitoring plan.

**Indicators**

The project proponents must:

- 1) Develop an initial plan for selecting biodiversity variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project’s biodiversity objectives and to anticipated impacts (positive and negative).<sup>47</sup>

Findings  
  
Conformance  
CAR/OBS

The Forest Again PDD provides a tentative plan for selecting biodiversity variables to be monitored. This initial plan includes the responsible project position as the faculty PMT member organizations and to be coordinated by the Research Coordinator and the monitoring frequency as yearly.

Yes  No  N/A

- 2) Develop an initial plan for assessing the effectiveness of measures used to maintain or enhance High Conservation Values related to globally, regionally or nationally significant biodiversity (**G1.8.1-3**) present in the project zone.

Findings  
  
Conformance  
CAR/OBS

No separate initial plan has been developed to test the effectiveness of HCV values in the project zone, the project clearly declare its commitment to developing a full biodiversity plan to include that of HCV variables.

Yes  No  N/A

- 3) Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.

Findings  
  
Conformance  
CAR/OBS

Forest Again clearly indicates in its PDD that, the project will fully develop a biodiversity monitoring plan by December 2009.

Yes  No  N/A

**GOLD LEVEL SECTION**

**GL1. Climate Change Adaptation Benefits - Optional**

**Concept**

**This Gold Level Climate Change Adaptation Benefits criterion identifies projects that will provide significant support to assist communities and/or biodiversity in adapting to the impacts of climate change. Anticipated local climate change and climate variability within the project zone could potentially affect communities and biodiversity during the life of the project and beyond. Communities and**

<sup>47</sup> Potential variables may include but are not limited to: species abundance; population size, range, trends and diversity; habitat area, quality and diversity; landscape connectivity; and forest fragmentation.

**biodiversity in some areas of the world will be more vulnerable to the negative impacts of these changes due to: vulnerability of key crops or production systems to climatic changes; lack of diversity of livelihood resources and inadequate resources, institutions and capacity to develop new livelihood strategies; and high levels of threat to species survival from habitat fragmentation. Land-based carbon projects have the potential to help local communities and biodiversity adapt to climate change by: diversifying revenues and livelihood strategies; maintaining valuable ecosystem services such as hydrological regulation, pollination, pest control and soil fertility; and increasing habitat connectivity across a range of habitat and climate types.**

**Indicators**

The project proponents must:

- 1) Identify likely regional 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.

Findings

Conformance  
CAR/OBS

Forest Again cites reference to published study, to identify extreme droughts and storms as some of the climate change scenarios likely to occur throughout the African region. Though the project mentions in the PDD that there is scarce information on climate change and variability scenarios in the equatorial regions, it further identifies increased rainfall and run-off as well as increased evaporative demand within equatorial Kenya where the project is located. The project however, does not identify any potential ‘without project’ changes in the local land-use scenario on the basis of these identified regional climate change and climate variabilities. The project identifies, habitat shift and changes in the range of malaria towards higher altitudes as some of the likely impacts from the predicted regional climatic change.

Amended findings:

Forest Again in the revised PDD argues on the basis of the predicted increased-total precipitation (in decrease less number of raining days), habitat shift and the general drought predicted for the Africa region that, the likely land use change in the grassland and forest lands of project sites will be an increased use of the lands for grazing. This is likely to result in overgrazing and together with precipitation change will lead to increased-soil erosion.

Yes  No  N/A

**CAR 17/09** Forest Again shall, on the basis of the identified regional climate change and climate variabilities, identify likely without project local land-use changes.

CAR 17/09 Closed on the basis of the additional information given by Forest Again as evidenced in the revised PDD and as described in the amended findings to section GL 1.1 above

- 2) Identify any risks to the project’s climate, community and biodiversity benefits resulting from likely climate change and climate variability impacts and explain how these risks will be mitigated.<sup>48</sup>

Findings

Forest Again identifies flooding, heavy erosion and growth of grass and weeds as some of the risks or impacts on the project activities as a result of the likely climate change

<sup>48</sup> Examples of how risks from climate change can be mitigated include the choice of species (adapted to various temperatures, precipitation, seasonality, salinity of water table, diseases/pests, etc.), the methods used to implement GHG emissions reduction activities, certainty of water sources critical for project success and location of activities in relation to anticipated land cover changes (e.g. flooding) expected as a result of climate change.

and variabilities. In order to mitigate these risks: 1) the project proposes to undertake rigorous maintenance programme at project sites to eliminate weeds and grasses until tree growth provides shade as mitigation measure for increased grass and weeds growth 2) use species that are tolerant to 'soil water submersion' especially in project regions prone to flooding and 3) monitor and control heavy erosion events in the early stages of tree growth until full forest cover takes control of reducing erosion.

Conformance  
CAR/OBS

Yes  No  N/A

- 3) Demonstrate that current or anticipated climate changes are having or are likely to have an impact on the well-being of communities<sup>49</sup> and/or the conservation status of biodiversity<sup>50</sup> in the project zone and surrounding regions.

Findings

Though Forest Again laments scarce information on climate change in equatorial Kenya, it clearly identifies increased temperature, atmospheric CO<sub>2</sub>, rainfall and runoff as some of the anticipated climate changes in the region. It further identifies evaporative demand, habitat shift especially for forest/grass mosaics and changes in the range of malaria towards higher altitudes as some of the impacts likely to affect the region.

Conformance  
CAR/OBS

Yes  No  N/A

- 4) Demonstrate that the project activities will assist communities<sup>51</sup> and/or biodiversity<sup>52</sup> to adapt to the probable impacts of climate change.

Findings

Forest Again indicates in its PDD the potential negative impact on well-being of communities and/or biodiversity and promises to design strategies to 'reduce and/or eliminate their effects' in the project's 'management plan'. Consequently there is currently no demonstration in the PDD that project activities will assist communities and/or

<sup>49</sup> Project proponents can demonstrate, for example, evidence of decreased access to natural resources of importance for communities' livelihoods and overall well-being. Climate change models that detail the predicted effects on these natural resources, such as freshwater, and participatory evaluations can be used to demonstrate anticipated impacts on communities.

<sup>50</sup> Project proponents can demonstrate evidence of a change in actual range, phenology or behavior of a species found within the project zone. For a range change, the project proponents should demonstrate that the change affects the entire range of the species and not just a subset of the range (which might be part of natural variation and offset by gains in other parts of the species range). Alternatively, the project proponents can demonstrate anticipated negative changes in the range of one or more species found in the project area using modeling techniques. The recommended modeling tool is Maxent because of its ease of implementation and performance (<http://www.cs.princeton.edu/~schapire/maxent/>). Recommended climatologies are IPCC4 A1 or A2 scenarios, Hadley or Japan high resolution GCM, downscaled to 1km (also available on the internet at <http://www.worldclim.org>). Best practice is to have this analysis conducted by a researcher who has published on climate and species distribution modeling using Maxent in the peer-review literature.

<sup>51</sup> Where communities are predicted to experience or are experiencing decreased access to natural resources because of climate change, project proponents must demonstrate that activities are likely to decrease communities' dependence on these natural resources. For example, where freshwater access is affected by climate change, a project can improve water management for maximum efficiency or provide alternative agricultural methods or products that require less water. Project activities may also help communities adapt to new planting and harvesting schedules to ensure maximum yields. Other climate change adaptation assistance can involve helping communities prepare for 'extreme events' such as floods, droughts and mudslides.

<sup>52</sup> Where an actual range or phenology change in a species is identified, project proponents must demonstrate that the project activities will make a significant contribution to mitigating this impact of climate change. Examples include: creating suitable habitat in an area that is becoming climatically suitable for a species that is losing climatically suitable habitats in other parts of its range; and providing a native food source for a species that is suffering population declines because of timing mismatches between its food needs and food availability linked to climate change (such as spring emergence of vegetation or insects). Where a modeled range impact is demonstrated, project proponents should demonstrate that the project significantly contributes to improving species' ability to occupy a new range or creates habitat in areas to which the species is migrating

biodiversity to cope with likely impacts of climate change neither is the proposed project 'management plan' ready.

Amended findings:

Forest Again indicates in its revised PDD that the project plans to help local community cattle owners make a transition to zero grazing. This is intended to reduce local overgrazing pressures on the area. It further indicates that trees are known to reduce regional temperature extremes and the project's 490 ha plantation in the context of the existing 10,000 ha (ie 4.9%) represents a significant forest cover with the potential for reducing possible temperature extremes predicted by climate change and other land use scenarios.

Conformance  
CAR/OBS

Yes  No  N/A

**CAR 18/09:** Forest Again shall demonstrate that project activities will help communities and/or biodiversity to adapt to the likely impacts of climate change.

CAR 18/09 closed on the basis of the additional information provided by Forest Again as evidenced in the revised PDD and as elaborated in the amended finding to section GL1.4

## GL2. Exceptional Community Benefits – OPTIONAL

### Concept

**This Gold Level Exceptional Community Benefits criterion recognizes project approaches that are explicitly pro-poor in terms of targeting benefits to globally poorer communities and the poorer, more vulnerable households and individuals within them. In so doing, land-based carbon projects can make a significant contribution to reducing the poverty and enhancing the sustainable livelihoods of these groups. Given that poorer people typically have less access to land and other natural assets, this optional criterion requires innovative approaches that enable poorer households to participate effectively in land-based carbon activities. Furthermore, this criterion requires that the project will 'do no harm' to poorer and more vulnerable members of the communities, by establishing that no member of a poorer or more vulnerable social group will experience a net negative impact on their well-being or rights.**

### Indicators

Project proponents must:

- 1) Demonstrate that the project zone is in a low human development country OR in an administrative area of a medium or high human development<sup>53</sup> country in which at least 50% of the population of that area is below the national poverty line.

### Findings

Forest Again cites references to demonstrate that, both Kenya (the country), Kakamega and Vihiga Districts (the district community) and the 57 villages located in the project zone are within the low human development index. Kenya is placed 148<sup>th</sup> out of 171 countries in the Human Development Index. The community in the project zone is said to be one of the densest, poorer rural populations in the world with poverty rate greater than 52%. Child mortality rate is high and less than 10% of households are without access to clean water and electricity. The validation team during the field visit observed and noted that indeed the community is densely populated, mostly rural,

<sup>53</sup> Low, Medium, and High Human Development Countries defined in the latest UNDP Human Development Report [http://hdr.undp.org/en/media/hdr\\_20072008\\_en\\_complete.pdf](http://hdr.undp.org/en/media/hdr_20072008_en_complete.pdf)

subsisting on agriculture and generally poor.  
 Conformance Yes  No  N/A   
 CAR/OBS

- 2) Demonstrate that at least 50% of households within the lowest category of well-being (e.g., poorest quartile) of the community are likely to benefit substantially from the project.

Findings

The Forest Again PDD indicates that 57 villages are located within the project zone of 5km around the Kakamega Forest. The Forest Again PDD cites a 2003 publication reference which estimates the population within this zone at approximately 250,000. The KiLuhya is the main tribe in this zone. These people are mainly subsistence agriculturist and poverty levels are estimated to be in the neighbourhood of 52% with an average annual income of less than US\$500 and 64% reporting no income. While access to clean water is less than 10%, greater than 90% use wood as source of fuel. It is further stated that due to seasonality and fluctuating prices for staple food such as maize, the gap between income from food production and expenditure for basic need such as food medicines among others is greater than 55%.

Forest Again indicates in different sections of its PDD to: 1) create between 100 to 200 jobs from the project for the local communities, 2) supply 10% of all seedlings produced by the project free of charge to communities to plant on their lands, 3) train members in other livelihood ventures such as butterfly farming, 4) promote the use of efficient stove to save the amount of fuel used, 5) provide clean water and 6) electricity to some of these communities. Though Forest Again indicates that it will be hiring specifically from communities and households with most need, the PDD does not go further to demonstrate that at least 50% of households within the lowest category of well-being (e.g., poorest quartile) of the community are likely to benefit more from the project.

Amended findings:

Forest Again in its revised PDD uses single head households and households reporting no income as the people with the 'most need' within the local communities. The PDD goes further to estimate the number of this people with the 'most need' or within the lowest category of well-being. The PDD states five different ways supported by the numbers of people which will be affected to demonstrate that the project is likely to benefit at least 50% of households with single heads or reporting no income in the area (people with the most need). The five ways that Forest Again plans to achieve this include: 1) hiring for jobs related to afforestation, 2) purchase of seedling from community groups, 3) donation of 10% of seedlings to land adjoin the project area for planting 4) use of 10% of carbon funds for supporting income generation projects and 5) use of 10% of carbon funds to improve human, physical and social capital of the area. The revised PDD further indicates that the project's monitoring plan for community livelihood will track the livelihoods of these households.

Conformance Yes  No  N/A   
 CAR/OBS **CAR 19/09** : Forest Again shall demonstrate that at least 50% of households within the lowest category of well-being of the community are likely to benefit more from the project.

CAR 19/09 was closed based on the action taken by Forest Again as evidence in the revised PDD and as described in the amended findings to section GL2.2 above.

- 3) Demonstrate that any barriers or risks that might prevent benefits going to poorer households have been identified and addressed in order to increase the probable flow of benefits to poorer households.

Findings

Forest Again’s PDD does not identify any barriers or risks that can prevent the flow of project benefits to poorer households within the communities nor addresses any such risks so as to increase the chances of project benefits flow to such households

Amended findings:

Forest Again in the revised PDD reports to have identified through literature and interview with the people four key barriers likely to prevent the flow of project benefits to the ‘most need’ and clearly indicates how the project intends to address these barriers. These are: 1) language barrier – and the project proposes to disseminate all Forest Again workshop information in the local tribal language, 2) Transport – and Forest Again indicates to provide transport or covers the cost of transport for workshop participants. It is also providing transport for the nursery materials will provide transport for transporting seedlings purchased from the communities 3) Time – especially in working in their farms and the project plans of providing free 10% of seedlings produce for the project to them to plant on their own lands 4) Upfront cost – the project will fund upfront cost associated with purchase of bags, seeds and other nursery materials

Conformance  
CAR/OBS

Yes  No  N/A

**CAR 20/09:** Forest Again shall show that any barriers or risks likely to prevent benefits flow to poorer households in the communities are identifies and are addressed; so as to increase the chances of project benefits flow to such households

CAR 20/09 was closed as a results of the action taken by Forest Again as evidenced in the revised PDD and as detailed in the the amended findings to section GL2.3 above..

- 4) Demonstrate that measures have been taken to identify any poorer and more vulnerable households and individuals whose well-being or poverty may be negatively affected by the project, and that the project design includes measures to avoid any such impacts. Where negative impacts are unavoidable, demonstrate that they will be effectively mitigated.

Findings

Forest Again indicates in various sections of the PDD that cattle grazers within the project area will be relocated to other sites. Also according to a sample of the community that the validation team talked with, the KFS has promised as part of this relocation programme to introduce other interventions such as zero grazing, depopulation of cattle and introduction of high yielding cattle breeds. However, Forest Again makes no indication whether these are the vulnerable households or part of them. There is no demonstration of any measures taken to indentify poorer or vulnerable households and individuals whose well-being or poverty may be affected negatively by the project. The PDD consequently does not include measures designed to avoid project activities impacting negatively on the well-being or conditions of such poorer or vulnerable households. Related to this is that, there is no indication to show that in under situations where negative impacts cannot be avoided the project has taken effective measure to mitigate impacts

Amended findings:

The revised Forest Again PDD indicates to have identified households whose young boys tend the cattle of rich cattle owners for a fee as the source of income for such families as one group of people likely to be negatively affected by the project. It indicates that, relocation of cattle or promotion of zero grazing is likely to end this business and loss of income of close to US\$15/month to these families. The project plans to assist these boys and their families by either giving them those tasks which can be done and as well allow the boys to go to school or provide a source of income for such families to enable them send these boys to school.

Conformance  
CAR/OBS

Yes  No  N/A

**CAR 21/09:** Forest Again shall identify poorer or more vulnerable households or

individuals whose well-being or poverty may be affected negatively by the project and design measures to avoid such impacts. In situations where negative impacts are unavoidable, it shall show that effective mitigation measure will be implemented

CAR 21/09 was closed following the action taken by Forest Again as evidenced in the revised PDD and as described in the amended findings in section GL 2.4 above.

- 5) Demonstrate that community impact monitoring will be able to identify positive and negative impacts on poorer and more vulnerable groups. The social impact monitoring must take a differentiated approach that can identify positive and negative impacts on poorer households and individuals and other disadvantaged groups, including women.

Findings

Forest Again makes a commitment to develop a full community impact monitoring plan by December 2009. See section CM3.3. It is expected that the plan will identify negative and positive impacts on poorer and more vulnerable groups and the social impact monitoring will take a differentiated approach so as to identify positive and negative impacts on poorer households and disadvantaged individuals.

Conformance  
CAR/OBS

Yes  No  N/A

**OBS 01/09:** Forest Again in preparing its community impact monitoring plan should identify negative and positive impacts on poorer and more vulnerable groups and it social monitoring should take a differentiated approach in order to identify positive and impacts on poorer households and disadvantaged individuals.

### GL3. Exceptional Biodiversity Benefits – OPTIONAL

#### Concept

All projects conforming to the Standards must demonstrate net positive impacts on biodiversity within their project zone. This Gold Level Exceptional Biodiversity Benefits criterion identifies projects that conserve biodiversity at sites of global significance for biodiversity conservation. Sites meeting this optional criterion must be based on the Key Biodiversity Area (KBA) framework of vulnerability and irreplaceability.<sup>54</sup> These criteria are defined in terms of species and population threat levels, since these are the most clearly defined elements of biodiversity. These scientifically based criteria are drawn from existing best practices that have been used, to date, to identify important sites for biodiversity in over 173 countries.

#### Indicators

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

1) Vulnerability

- a. Regular occurrence of a globally threatened species (according to the IUCN Red List) at the site;
- b. Critically Endangered (CR) and Endangered (EN) species - presence of at least a single individual; or
- c. Vulnerable species (VU) - presence of at least 30 individuals or 10 pairs.

Findings			
Conformance	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
CAR/OBS			

Or,

2) Irreplaceability

- a. A minimum proportion of a species' global population present at the site at any stage of the species' lifecycle according to the following thresholds:<sup>55</sup>
- b. Restricted-range species - species with a global range less than 50,000 km<sup>2</sup> and 5% of global population at the site; or
- c. Species with large but clumped distributions - 5% of the global population at the site; or
- d. Globally significant congregations - 1% of the global population seasonally at the site; or
- e. Globally significant source populations - 1% of the global population at the site;

Findings			
Conformance	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
CAR/OBS			

<sup>54</sup> See Appendix A of CCB Standard "Potential Tools and Strategies" for further guidance.

<sup>55</sup> While there is wide consensus on the need for a sub-criterion for bioregionally restricted assemblages, this sub-criterion has been excluded from the Standards until guidelines and thresholds have been agreed.

3) Demonstrate that the project zone is in a low human development country OR in an administrative area of a medium or high human development<sup>56</sup> country in which at least 50% of the population of that area is below the national poverty line.

Findings

Conformance

CAR/OBS

Yes

No

N/A

---

<sup>56</sup> Low, Medium, and High Human Development Countries defined in the latest UNDP Human Development Report [http://hdr.undp.org/en/media/hdr\\_20072008\\_en\\_complete.pdf](http://hdr.undp.org/en/media/hdr_20072008_en_complete.pdf)

## Appendix C: STAKEHOLDER LISTS (CONFIDENTIAL)

### List of Project Proponent Staff Consulted

Name	Title	Contact	Type of Participation
Mark Lung	Executive Director, Eco2librium LLC	mlung@western.edu	Interviews and meetings

### List of other Stakeholders Consulted

Name	Organization	Contact	Type of Participation
Solomon K. Mibey	Kenya Forest Service, Western Conservancy (PMT, member)		Interview
Baraza J, Wangwe	National Environmental Management Authority (NEMA), Western Province (PMT, member)	barazajw@yahoo.com	Interview
Prof. Kingiri Senelwa	Moi University (PMT, member)	ksenelwas@mu.ac.ke	Interview
Loice Kwatamba	Valongi Women Energy Saving		Meeting
Ben Okalo	Kakemge Environmental Education Programme (KEEP)	keep@yahoo.com	Meeting
Christine Nanjila	KEEP (PMT, member)	keep@yahoo.com	Meeting
Luice Kwtemba-Valonji	JIKOS		Meeting
Beatrice Muchesia	Bidii Youth Group Nursery		Interview
Sylvester Mambili	Chairperson Municipal Ileho Shinyalu (MUILESHI)	+254724205777, +254738101160	Interview
Thomas Mmasi	Chairperson, Muliru Farmers Conservation Group	+254725200669	Interview
Johnny Shunza	KEEP Nursery		Interview
Pamela Sore	KEEP Nursery		Interview
Thomas Dominic	Musha Community Forest Association		Interview
Aggrey Mambili	Musha Community Forest Association		Interview
Athanas Mushika	Musha Community Forest Association		Interview
Antohony Muhatsi	Musha Community Forest Association		
Hudson Manyengo	Shibuye Khayega Forest Community Conservation Group	Box 127 Shinyalu, Kakamega	Interview
Rodwesi	Shibuye Khayega Forest Community Conservation Group	Box 127 Shinyalu, Kakamega	Interview
Simon Andega	Jiteketerere S. H. Group		Interview
Musila Winfred M	National Museum of Kenya (NMK)	+254722493915, wmusila@yahoo.com	Interview
Boniface Amwo	Mmuliru Community		interview
P. W. Mukira	Kakamega District Forest Officer	Tel: +254722889830	Telephone interview