

Sent: Thu 30/11/2023 14:18

Dear Ms Nazareth and your IC-VCM colleagues,

We are writing to bring your attention to the recent outcome of a 'review' by Verra of a project which we have investigated and found to fail on every major criterion of what could be considered as a 'credible' carbon offset project. We are aware that it is not necessarily your role or responsibility to 'adjudicate' or otherwise intervene in relation to specific projects, and we are not asking you to do so. Our aim here is to highlight the very serious systemic failings of Verra this review has revealed, and the implications for your own consideration of the Verra programme.

In January 2023, following a [detailed investigation and analysis by Survival International](#), Verra 'suspended' the soil carbon project being run by the Northern Rangeland's Trust across two million hectares of Indigenous land in northern Kenya. Carbon credits from the project could not be sold until Verra had completed a 'review' of the accusations made by Survival. The review was undertaken according to Section 6 of Verra's overall [Registration and Issuance Process](#), and constitutes the ultimate procedure available to it in the event of the most serious concerns about a verified project.

Verra finally published the [outcomes of this review](#) (downloads pdf) on November 23rd. It claims that it has been able to find "**no non-conformities**" in relation to the project.

Analysis of Verra's 'review' and response to Survival's detailed investigation reveals multiple systemic omissions, failures and errors in this 'Section 6' review process, notably that:

1. Rather than investigating the many fundamental problems with the project identified by Survival – relating to its entire **design and validation** seven or eight years ago - Verra's review merely considered the **most recent** audit of the project by validation and verification body (VVB) Ruby Canyon Environmental (RCE), conducted in late 2022. Whilst Verra's review process states that "*The **validation/verification body must address the findings and/or nonconformities raised in this report***" what is then reported in the review of the NRT project is that the VVB simply **denies any responsibility**, saying, for example "*The **initial review and assessment of the project design was completed during the project's validation, which was carried out by a VVB other than RCE.***"

2. Hence, the most **critical issues** concerning the **additionality** of the project, evident serious problems with **carbon leakage**, highly questionable **baseline scenarios and carbon calculations, impermanence** of the claimed soil carbon storage, inability of **the project to control the project boundaries, structural flaws in the monitoring** methodology and the use of worthless monitoring data, clear **non-compliance with the methodology** under which the project was developed, the **lack of a proper legal basis** for the project when it was established, as well as self-evident **absence of proper consultation** with, or Free Prior and Informed Consent from, the area's many indigenous inhabitants – have **simply not been addressed in the review**.

3. In some cases, Verra draws positive conclusions about the project that are simply not justified by the information provided to them by the project's most recent verifier.
(Our full rebuttal of Verra's so-called review is available [here](#).)

In our view, **the outcome of Verra's review demonstrates that it has no effective, reliable or credible 'measure of last resort' which would be used to cancel or reverse an offsetting project or specific credits' issuance**, even where there is compelling evidence that the project/issuance is not

compliant with the relevant Verra methodology, is failing against all key criteria applicable to offset projects, and is therefore not generating credible credits.

The outcome also points to other multiple structural problems with Verra's system, notably:

- There are **inherent conflicts of interest** in Verra 'reviewing' a project or credit issuance when it has a vested commercial interest in *not* finding fault with said project or credit issuance;
- Verra's system provides for **no appeal** against such a decision;
 - Verra's system includes **no external/independent appellate or grievance body**.

All of the foregoing demonstrates, we believe, non-compliance of Verra with IC-VCM's Core Carbon Principle 1 (CCP#1), which requires "*The carbon-crediting program shall have effective program governance to ensure transparency, accountability, continuous improvement and the overall quality of carbon credits.*"

It further indicates non-compliance with CCP#4, relating to "*Robust independent third-party validation and verification*", as it is clear that Verra is failing to probe and challenge the clearly faulty validation and verification standards of companies which have carried out audits for many of Verra's verified projects.

It demonstrates that Verra cannot and will not guarantee compliance with CCP#5-#7, relating to Additionality, Permanence and robust quantification of emissions reductions and removals. It shows failure against CCP#9, relating to developmental benefits and safeguards.

Given that this is a systemic failure on Verra's part, applicable across all its methodologies, the implication to us is clear: that **no Verra methodology can be deemed to be compliant with the IC-VCM Core Carbon Principles** . We therefore request that no Verra methodology is ruled to be IC-VCM CCP-compliant.

We thank you for taking the time to consider this matter.