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Dear Ms. Gaughran and Mr. Malombe,

***Re: SOMO/KHRC response to Verra's Review Report on the Kasigau Corridor REDD+ Projects***

Thank you for your letter to Verra dated 8 February 2024 (the "8<sup>th</sup> February Letter") regarding Verra's *Review Findings Report* (the "Verra Report"). The Verra Report was issued in response to the joint report by SOMO and KHRC, "Offsetting human rights: Sexual abuse and harassment at the Kasigau Corridor REDD+ Project in Kenya", dated 6 November 2023 (the "SOMO/KHRC Report"). The SOMO/KHRC Report relates to Project ID 562 (The Kasigau Corridor REDD Project – Phase I Rukinga Sanctuary) and Project ID 612 (The Kasigau Corridor REDD Project – Phase II The Community Ranches) (the "Projects").

In the 8<sup>th</sup> February Letter, you expressed concerns about the scope and methodology of Verra's review of the Projects, including some conclusions in the Verra Report.

In approaching your concerns, I wish to note that Verra took seriously the allegations in the SOMO/KHRC Report: we released the Verra Report after three months of review and consideration, and during this time we placed the Projects on hold, suspending issuance of credits for the duration of that period.

In its review of the Projects, Verra took into account the full SOMO/KHRC Report and also the Investigation Report Issued by ALN Kenya on behalf of Wildlife Works Carbon LLC (WW) dated 20 December 2023 (the "ALN Report").

WW's responses to the findings in the Verra Report showed, in Verra's view, that WW is taking the necessary steps to address the alleged harm and mitigate the risk of future harm. The Verra Report sets out 4 findings and identifies 13 required actions that align with Verra's program rules and requirements. Going forward, WW must continue to implement the required actions in order to keep the project status active.

The 8<sup>th</sup> February Letter does not acknowledge the conditionality attached to the reinstatement of the Projects, as set out in the Verra Report. Given the seriousness of the allegations, Verra is requiring WW to release, within two months, information about its gender equity task force and then to provide, within twelve months, evidence that all actions required by the Verra Report have been implemented. Most significantly, should WW

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fail to provide the required evidence that the actions required by the Verra Report have been implemented, Verra has reserved the right to apply a hold status to the Projects, thereby suspending further issuance of credits. In addition, for the lifetime of the Projects, should a future verification report show that any of the actions required by the Verra Report are no longer being implemented, Verra may place the Projects on hold. These conditions show that the reinstatement of the project is conditional upon WW's demonstrating continued mitigation of harm to affected stakeholders.

Verra relied on multiple sources, including the SOMO/KHRC Report, the ALN Report, and responses provided by WW as the project proponent. In the interest of fairness, a project proponent is allowed to and should respond to allegations made in relation to a project. The ALN Report was issued by an independent law firm, which, although commissioned by WW, has a duty to the court to provide factual and truthful information. I note that no formal legal proceedings have been raised in relation to the allegations made in the SOMO/KHRC report. As such, Verra must rely on a variety of sources when conducting its review.

Verra has also been made aware of a letter sent to you by the Marungu Location Community dated 12<sup>th</sup> February 2024 (the "Marungu Community Letter"). The Marungu Community Letter was shared directly with Verra by the Chairperson of the Marungu Community Representatives, due to their concerns over the approach taken by SOMO and KHRC in their investigation and the characterization of the Projects. They highlight the positive impact of the Projects on the community beyond carbon offsetting. The Marungu Community Letter expressly states that the community "stands by the outcomes of the independent investigation done by Wildlife Works".

I will now address the additional points you have made in your 8<sup>th</sup> February Letter.

#### ***Scope of the allegations of sexual harassment and abuse***

The 8<sup>th</sup> February Letter maintains that the scope of the sexual harassment and abuse was wider than the investigation by WW indicates and that neither SOMO or KHRC have at any point implied that the allegations of sexual harassment and abuse were limited to one department or individual. The ALN Report has recommended disciplinary action against both the Head of Security and the Head of HR. WW has confirmed as set out in the Verra Report that the employment of both these individuals has been terminated. The ALN Report was not able to corroborate further instances of harassment or abuse and neither have any judicial proceedings been raised, as far as Verra is aware. The ALN Report was also unable to corroborate the allegations of violence or misconduct towards members of the community. Nonetheless, the requirements and conditions attached to the Verra Report are intended to ensure that where such offences do take place, WW must have effective mechanisms in place to support stakeholders with coming forward and to implement disciplinary actions against any member of staff involved in or complicit in such actions.

#### ***Inadequacy of WW's reporting mechanism for sexual offences***

SOMO/KHRC have expressed their concern that it was possible for an individual to undermine the grievance mechanism. The Verra Report specifically requires WW to (i) determine why its existing grievance redress procedure failed to support reporting and detection in relation to the alleged sexual offenses; (ii) establish a grievance redress procedure that is consistent with the relevant program rules and, in addition, provides for the anonymous filing of complaints and protects the confidentiality of complainants; (iii) provide to all staff and contractors regular and ongoing mandatory training in relation to the design and implementation of its grievance redress procedure; and (iv) publicize its grievance redress procedure to local communities and other stakeholders in a culturally-appropriate manner, including language and gender sensitivity. WW addressed these requirements in the Verra Report, including the ability to make an anonymous complaint, ongoing training on the grievance procedure and weekly progress meetings on the internal grievances identified by ALN and the clinical psychologist in response to the SOMO report. WW will republicize changes made to the grievance procedure to more effectively address sexual harassment offenses. This work will be conducted together with the Kasigau Corridor Grievance Committee and reported on in future verifications. The Verra

Report requires WW to confirm the achievement of these requirements within certain timeframes and the requirements of the Verra Report will be expressly included as a condition of successful verification on an ongoing basis.

***Other negative community impacts and provision of remedy***

Far from not addressing the abuse alleged by the SOMO/KHRC Report, Finding 1 of the Verra Report requires WW to “discipline all staff and contractors involved or complicit in sexual offences relating to the Projects, up to and including termination of employment and/or contracting arrangements and cooperation with relevant legal authorities if applicable.” In addition, staff and contractors must be provided with regular and ongoing mandatory training in relation to sexual offences and identify risks of sexual offences in future through continued engagement with all relevant stakeholders in a culturally appropriate manner, which includes reference to language and gender sensitivity. Mitigation measures must be not only be designed but implemented to protect all relevant stakeholders, including women and girls.

Verra continues to take the allegations and findings of the SOMO/KHRC Report seriously and, through the Verra Report, has put in place mechanisms that require WW to address the harm to community members and mitigate future harm on an ongoing basis. The conditionality of the Verra Report shows that Verra has sought to require more effective support and means of redress for affected community members in a way that also allows them to benefit from the continuation of the project.

Yours sincerely,

/s/ Robin Rix

Chief Legal, Policy and Markets Officer  
Verra