



Verra’s ‘review’ of the Northern Rangelands Trust carbon offsetting project in Kenya is a shocking whitewash – and demonstrates further how the Verra system is fundamentally broken at all levels and is a serious threat to Indigenous peoples

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In January 2023, following a detailed investigation and analysis by Survival International, carbon offsets standard-setting and verification body Verra ‘suspended’ the carbon project being run by the Northern Rangelands Trust across 2 million hectares of Indigenous land in northern Kenya.

Carbon credits from the project could not be sold until Verra had completed a thorough ‘review’ of the accusations made by Survival. Verra finally published the outcome of this review on 23 November, and claim that they have been able to find “no non-comformities”.

Analysis of Verra’s response to Survival’s detailed concerns reveals multiple systemic omissions, failures and errors¹, notably that:

- 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 considers the *most recent* audit of the project by verification body Ruby Canyon Environmental, conducted in late 2022.
- Hence, the most *critical issues* concerning the *additionality* of the project, evident serious problems with *carbon leakage*, highly questionable *baseline scenarios*, *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.
- Even within the unjustifiably limited scope of the review, the responses of the recent verifiers remain unconvincing. So, for example, instead of considering whether Free Prior and Informed Consent was ever originally granted to the project by the Indigenous inhabitants (for which no evidence has ever been presented by the project) the review

¹ Note that Survival has not assessed in detail the ‘issues’ raised in the review which were not in fact part of our analysis and critique of the NRT project.

merely considered whether there has been “*demonstration of how the project design and distribution of benefits were communicated to local communities*” during the most recent audit. It is clear from the information presented by Verra that even the recent “communication **to**” communities has been far from complete and adequate, and that local views on the project are at best mixed.

- In some cases Verra draws positive conclusions about the project that are simply not justified by the information provided to them. One example of this is the conclusion that the auditors have adequately “described how rotational grazing is being implemented as planned in all conservancies” – when this has clearly not actually been demonstrated.
- Some of the statements made by Ruby Canyon in its responses to the Verra review are alarming, including that “*Given the size and scale of the project and its stakeholders on and off-project, it is understood that negative impacts in some form are unavoidable.*”

According to Verra’s own rules under which it can conduct a ‘review’ of a project (its “[Registration and Issuance Process](#)”, Section 6), the organisation may “*at its discretion, review registered projects and issued VCUs [verified carbon units] where it has concerns about adherence of the project to the VCS [verified carbon standard] Program rules and the applied methodology.*”

In fact, the review now conducted by Verra of the Northern Rangelands Trust project has carefully avoided reviewing “issued VCUs” or the “adherence of the project to the VCS Program rules and the applied methodology”, and indeed any of the underlying problems which challenge whether the project can legitimately issue any carbon credits at all.

It is thus a travesty of a review, which serves only to highlight the structural failure of Verra’s processes, including at the highest levels, such as the Section 6 review, where serious errors are supposed to be thoroughly addressed and reviewed.

Because of this failure Verra has allowed the project to continue, and for Verra itself to carry on collecting its commissions on the sale of NRT’s carbon credits. It will, however, do nothing to reassure the potential buyers of these credits that they in any way represent real and additional savings of carbon in the soils of northern Kenya, nor that the project has received the Free Prior and Informed Consent of the project area’s many Indigenous inhabitants.