

Three key omissions, ten lies and misrepresentations in NRT's statement

24th March 2023

This is the Survival response to the [Northern Rangeland Trust \(NRT\) response](#) to our report [“Blood Carbon: how a carbon offset scheme makes millions from Indigenous land in Northern Kenya”](#).

General comments:

1. NRT's response fails to address most of the key concerns raised in Survival's report. In particular, it does not address our view that the project lacks a basis of 'additionality' and has no empirical baselines, as fundamentally required by carbon offset projects. The NRT response further fails to address the issue that the project is demonstrably non-compliant with the Verra-approved methodology under which the project was developed – especially in terms of its inability to control the project's borders – and should never have been validated and allowed to generate carbon credits on each of these grounds.
2. NRT's response indicates that it has very little understanding of its own project, or of the content of its own project documentation that is publicly available due to the validation and verification of this project through the Verra system.
3. NRT's response includes multiple blatant and demonstrable misrepresentations of what Survival's report actually says.

Specific responses to NRT's responses:

1. “The report suggests that NRT is financially benefiting from the project, when in fact NRT does not take any profit.”

At no point in its report does Survival use the term "profit" to describe NRT's take of the proceeds of carbon credit sales. The report merely points out that, according to the project's own documents, NRT directly takes 40% of these proceeds. As NRT has never published any audited accounts, it is not possible to know how much 'profit' is retained from this, or rather spent on NRT's own priorities, such as arming rangers held responsible for human rights abuses or building more fences which disrupt pastoralists' migration routes.

2. **“The report suggests that minimal Free Prior and Informed Consent (FPIC) occurred, in fact a detailed and extensive FPIC process was followed, conducted in local languages, and the project has massive and widespread community support”.**

Survival’s report points out that the issue of consultation and consent was never clearly resolved during the validation and verification processes. Auditor reports suggest that NRT provided photographic ‘evidence’ of consultation that was questioned by auditors in terms of its validity, and was anyway incomplete and unconvincing in terms of whether this evidence actually showed proper consultation had been undertaken and free prior and informed consent obtained.

3. **“Their report fails to correctly identify the project developers, its purchasers, its location and does not even provide correct population data, despite this information being available on NRT’s website and the project website”.**

Survival’s report draws all the above information from the project’s own ‘validated’ project information and the subsequent verification report.

4. **“The report falsely claims that NRT has provided them data, when in fact Survival International has never once contacted NRT or the NKRCF to request this data”.**

At no point does our report claim that we have been “provided” with information by NRT. Information has been obtained entirely from NRT documentation that was available to the project validators and verifiers. The sources of this are referenced in our report.

5. **“The report claims that the carbon credits are directly based on satellite imagery, when in fact this is not the case. The NDVI data are used only to identify areas that were grazed in accordance with the project activity and those that were not - for purposes of excluding the latter from crediting for the applicable monitoring period. NDVI data are not an input to the accrual quantification model.”**

The Survival report does not claim this; it points out that the use of satellite imagery has been a part of the method of developing the project’s putative monitoring system, and that, along with the monthly grazing reports and livestock movement maps, these were demonstrably faulty and inadequate for project monitoring.

6. **“The report claims that leakage is not accounted for, when in fact every animal that is unaccounted for or moves off the project site is automatically assumed to be causing degradation where they are, a conservative approach adopted to reduce the number of credits otherwise to be issued from the project. Credits are issued only with respect to livestock counts and movements for which there is reliable data”.**

The report notes that ‘leakage’ of carbon has to some extent been acknowledged by the project. However, it makes the key point that the evidence provided by NRT that it has the means of *accurately calculating* this (livestock movement maps and grazing reports) is demonstrably inadequate for this purpose. If the leakage from the project cannot be properly calculated within a reasonable tolerance, then neither can the net amount of credits issuable to the project.

7. “The report suggests that soil testing is not being conducted, when in fact direct soil sampling has been conducted at the beginning of the project and then during our validation and verification site visits in 2021. Results of the 2021 sampling are currently going through verification and provide support for the robustness of the model and effectiveness of the project activity.”

The report points out that, as yet, no empirical soil carbon content data based on actual testing has been published, either before the project was established (i.e, as the ‘baseline’) or subsequently. Hence all the carbon credits issued for the first eight years of the project (nearly seven million of them) have been based entirely on a theoretical model of what NRT claims *might* have happened in terms of increased soil carbon storage, according to its theoretical models, rather than what has *actually* happened.

8. The report knowingly repeats long discredited claims of land grabbing and human rights abuses, all of which have been investigated and disproved by both the Kenyan National Government, Kenyan County Governments, and a recent independent report.

The reports of human rights abuses relating to NRT’s rangers have been [well-documented](#). The ‘review’ of these cases as implemented by NRT’s donors has been [comprehensively dismissed](#).

9. The report falsely claims that a conservancy has withdrawn from the project.

The Namunyak Conservancy, one of the original participants in the carbon project, withdrew from NRT and the project in early 2022. Its withdrawal letter is available [here](#).

10. The report incorrectly reports the revenue sharing agreements of the project, despite this information being publicly available.

The report re-states what is stated in the project’s own documentation.