

Rebuttal of Jutta Kill's anti Mai Ndombe REDD+ Case Study
In the Paper entitled "Unearned credit – why aviation offsets are doomed to fail"

Introduction

We feel it is important for context that we point out that Jutta Kill is a self-proclaimed enemy of REDD+ who has a history of being a hired gun for anti-REDD foundations who seek to discredit our work. This is not our first dealing with her. In fact this paper mostly references other prior papers written by Ms. Kill which we have previously discredited. FERN, the organization that published this report written by Ms. Kill is an NGO that has a clear anti carbon market position, because they believe that allowing any offsets to be sold in the market is delaying activity in reducing emissions in the industrial north. This is a philosophical position not specific to REDD+ offsets. We believe that there is no evidence to support this position, and in fact to the contrary studies have shown that companies that use offsets to achieve carbon neutrality are doing far more than the average company in their sector to reduce their own source emissions as well. Therefore both Ms. Kill and FERN have a longstanding record of looking for ways to discredit forest carbon offsets to support their view that they shouldn't be allowed to exist.

Many of the arguments Ms. Kill uses in this FERN paper are actually just her opinion based on her opposition to the concept of market based REDD+ and offsets. It is clear that the REDD+ industry has addressed all the criteria needed to support ICAO, and that REDD+ is in fact a great option to require the airlines to use their financial growth to support reductions in deforestation, while they simultaneously invest in new fuel technologies that will reduce their own emissions. Opposition from these ideologue NGOs based on an idea that markets are bad and forests should just be left alone, are at best naive and at worst completely counterproductive arguments that will prolong the real world status quo of forests disappearing rapidly everywhere.

Detailed rebuttal of 8 assessments in the Mai Ndombe Case Study

Criteria 1: Additionality - PASS

Ms. Kill references her own prior reports as the basis for her assessment here, and her argument contains the following fatal flaws:

- 1) The forest concession we took over in 2010 was not a new concession, it was an existing concession, that had been suspended pending settlement of tax issues and it was going to be reissued had we not intervened. We provided concrete evidence of this to two separate independent auditors of the project during the validation and verification audits. Ms. Kill in her prior attempts to discredit our work chose to make a wild speculation that the evidence did not exist, simply because she had not bothered to ask us to see it. The evidence contains sensitive documents which is why they are not part of the public record, but we at Wildlife Works have shared them with the auditors, our customers and anyone with a genuine interest in understanding the truth. Ms. Kill's claim that our concession wouldn't have been re-awarded due to the moratorium is absolutely false. In point of fact two other suspended concessions in the Mai Ndombe were re-awarded. Therefore our REDD+ project is clearly additional.
- 2) All avoided deforestation REDD+ carbon offset projects are based on an avoided deforestation premise, or they wouldn't exist, as clearly the forests we are protecting are still there, so to compare performance in protecting remaining forests you need to have a reference scenario or baseline to compare to of similar forests under similar threat that were recently deforested. Our



Mai Ndombe project followed this common approach of finding the most relevant reference area to demonstrate the most likely business as usual case for the forest we are protecting. See below for more details.

Criteria 2: Based on a realistic and credible baseline - PASS

Ms. Kill clearly chooses to present false statements as facts to support her argument ignoring how REDD+ actually works. The Mayombe reference area for the Mai Ndombe project is not supposed to look like the Mai Ndombe forest now. The point is that it should have been the most similar to the Mai Ndombe project area at the beginning of the historical baseline period, so that what happened to Mayombe can in fact be the most realistic and credible evidence of what would happen to Mai Ndombe in the absence of the REDD+ project. The fact is that Mayombe is almost the exact same distance from Kinshasa as Mai Ndombe, and two decades ago at the beginning of the historical baseline period, the reference area in Mayombe was not a mosaic of farmland and forest, it was an intact forest the same size and type¹ as the Mai Ndombe project forest (See White, 1983), and was a logging concession operated by the same logging company that was operating the Mai Ndombe project area concession prior to Wildlife Works taking it over.

The fact that the Mayombe forest became aggressively deforested over the past twenty years under the management of the exact same logging company is precisely what provides the most credible baseline for the Mai Ndombe project. The argument that the company's past behavior is the most likely predictor of future behavior is further supported by the fact that they owned two concessions in the Mai Ndombe, the one we took over and another immediately to the south of our concession that is now almost completely deforested.

Now that the Mayombe area has been completely deforested, the next frontier for forests is the Mai Ndombe. Our Mai Ndombe project is more than 50% of the frontier of the Congo Basin Forest closest to Kinshasa, and the population in our area is not at all sparse.

These actual facts were presented to the two independent audit reviews the project has undergone, and the auditors visited the reference area in Mayombe and reviewed all of the documentation and both came to the conclusion that our baseline was the most realistic and credible scenario.

Criteria 3: Quantified, Monitored Reported and verified - PASS

Ms. Kill's only argument here is to suggest that because the auditors didn't reach the same conclusion she did they must not be credible. In fact the auditors who are tropical forest experts did perform an exhaustive review of the additionality and the baseline scenario including visiting the reference area and the project area and examining all the factual evidence Ms. Kill chooses to overlook. Both of the independent audits were conducted by international firms that are accredited under international environmental auditing standards, including being qualified under the United Nations to audit climate projects. Furthermore, Wildlife Works is a conservation company that is making a 30-50 year commitment to these project communities where our goal is to mitigate climate change, create green economic development and enhance biodiversity. Our team of over 100 people in the Mai Ndombe are all Congolese working hard to support these rural forest communities of over 50,000 people. For Ms. Kill to suggest we would collude with the auditors to cheat is offensive.

Criteria 4: A clear and transparent chain of custody - PASS

¹ According to the DRC's forest classification at the end of the 20th century, the Mayombe forest is categorized as a moist lowland forest, the same class as the Mai Ndombe forest. The Luki Man and Biosphere reserve in Mayombe features a remnant of this forest that shows the same physiognomic characteristics as the Mai Ndombe forest.

Ms. Kill again presents an untruth as a fact and then draws an invalid conclusion to support her argument.

The project does in fact make publicly available the information to allow public monitoring of the carbon credits chain of custody. The Markit registry for the Mai Ndombe project does in fact track every single credit issued to the project by unique serial number from issuance to retirement, and double selling is impossible under this system.

Criteria 5: Represent permanent emission reductions - PASS

Once again Ms. Kill presents a fact and then draws her own flawed conclusion to support her desire to discredit REDD+. It is certainly true that REDD+ projects have to deal uniquely with the concept of permanence, because of course protecting a forest for one year and then seeing it destroyed means you just delayed emissions. That is why REDD+ projects must run for at least 30 years and must have a system in place to deal with reversals during that time period. That system for VCS REDD+ projects is an insurance buffer pool into which every project has to place a significant number of credits that cannot be sold, based on the independently assessed risk of each project so that if one project suffers a subsequent loss of forest that would negate emission reductions previously issued, those credits can be canceled and replaced by still valid credits from another project, maintaining the environmental integrity of any credits bought under the VCS system as a whole.

To quote EDF, an international NGO highly respected for their work at the UN climate level:

“Producing an equivalent output with less emissions than in a prior baseline scenario constitutes a permanent reduction in any economic sector. The UNIPCC Special report on Land Use, Land Use Change and Forestry, in discussing permanence of REDD+ results, notes that permanent emission reductions – whether they are from fossil or biological carbon – do not mean that a particular carbon stock is left underground or sequestered in a forest forever. The IPCC report states “...suppose that a homeowner replaces an incandescent bulb with a compact fluorescent, avoiding one ton of emissions over the life of the compact fluorescent. The benefit is not reversed even if an incandescent bulb is installed at the end of the compact fluorescent’s useful life.” Similarly, REDD+ programs that reduce the flow of carbon dioxide emissions to the atmosphere from the forest sector achieve benefits even if emissions increase later.

To address the possibility that emission reductions might be later reversed, REDD+ programs take additional steps, such as the establishment of diversified buffer reserves (i.e. reserves of reductions which are not transferred but which can be accessed to compensate for any reversals). Consequently REDD+ programs achieve greater CO₂ benefits than other programs which do not establish such buffers.”

Ms. Kill presents a graph of deforestation in the Mai Ndombe project area as evidence that we have not been able to control deforestation, but there are a few problems with her presentation:

- 1) She doesn’t show the project’s historical emissions baseline as a comparison of whether these emissions still represent a dramatic reduction against the baseline (they do)
- 2) That the process of deforestation in a commercial logging concession begins slowly with roads and selective harvest of the merchantable timber, and then increases rapidly through a well understood process called the cascade of deforestation with illegal logging, fire and farming following the loggers into the concession, and this was an early stage concession with only 28,000 hectares having been logged before we took over
- 3) Most importantly, that the two spikes in deforestation in 2010 and 2013 are the result of fires that spread into the concession and the whole Mai Ndombe province as a result of a massive cyclical drought that happened during these years. Such an event is difficult to predict. However, recovery



is more likely to happen in protected forests as shown in recent deforestation analysis results that were not presented by Ms. Kill. In fact recent land use and land cover change from the same source shows net regrowth in the project area. Nonetheless, we are working with the communities to find ways to stop fire damage to the forest as well as to address all other drivers of deforestation in the project area and its surroundings.

- 4) That we reported all emissions from fire in our concession and deducted those emissions from our performance against the baseline during our verifications, and the net benefit of our activities against the baseline were still dramatic.

Criteria 6: Safeguard against a potential increase in emissions elsewhere - PASS

Ms. Kill suggests that we don't define how we will ensure deforestation is not displaced. This is simply untrue. We do define it, and it was supported by the independent auditors. There was at the time we began our project and there still is in fact a moratorium on NEW logging concessions. This is why the logging company was so aggressively trying to get this concession back. Without the logging company activity opening up the forest, the cascade described above cannot happen, therefore the moratorium was the basis for the fact that our emission reductions would not move elsewhere.

Criteria 7: Only counted once towards a mitigation obligation - PASS

Ms. Kill uses the same untruth that was used in her argument to Criteria 4 to make the argument that our emission reductions could be counted more than once against a mitigation obligation. They are tracked for their lifetime in an independent registry and cannot be double counted or double sold. Of course we all support an increase in scale to sub-national, national and global REDD+ to allow for an aggregation of site specific activity like our Mai Ndombe REDD+ project into the international climate accounting. In fact our project is at the heart of the world's first sub-national program for the province of Mai Ndombe that Ms. Kill has also tried to stop as part of her ongoing war against REDD+.

Criteria 8: Do no net harm - PASS

Ms. Kill is again selectively reporting to suit her arguments. It is true that a majority of the forest concession overlaps customary forest ownership, but the REDD project does not deny the communities any access to forest for any reason. They are just told the benefits they can receive from the project if they avoid further deforestation, they are taught how to make more productive use of the land they have already cleared and they make their own decisions. Wildlife Works has no enforcement in the Mai Ndombe whatsoever. As a result of this approach we received legal written approval from all of those customary chiefdoms to operate our REDD+ project in their forest. This is not at all what led to conflict. In fact there was some opposition and even violence directed toward our REDD+ project in the early stages of the project from some elements in the communities Ms. Kill cites, but we have repeatedly demonstrated that this violence was financed by the logging company who had lost the concession to us, in an attempt to destabilize our project and see us fail so they could get the concession back. As time has passed and the communities throughout the project area have seen the benefits of the REDD+ project such as schools being built in other villages and the benefits being shared as promised, the logging company has stopped their efforts and the tensions have disappeared. It is important to note that to the best of our knowledge Ms. Kill has never set foot in our project area. On the other hand, contrary to her claim, the audit teams did in fact go to Kesenge (Ntomb'e Nzale), Mbale (Bolia) and Mpili (Basengele). They have heard community members expressing their initial concerns, based on the many false rumors they were told by representatives of the logging company, including our favorite, that we were stealing the oxygen from the forest to send to Canada, and that realizing they were being misled they now fully embrace the project. All communities in the Mai Ndombe REDD+ Project Area are in grave need of economic development. Their first priority is always to have a school built in their village. The Mai Ndombe REDD+ project is a decades long project, so clearly we cannot build a school in every village all



at once, but we have enacted a schedule that fits with our financial ability. This inevitably causes some minor discontent in some communities that the Project has not yet been *more* active in their area.

Summary

Wildlife Works Mai Ndombe REDD+ project represents the best of the potential of REDD+ to solve a very difficult problem of stopping deforestation while providing real sustainable economic development alternatives to one of the most impoverished communities in the world. We have been independently audited on multiple occasions over the past 7 years by highly respected international audit firms, and we are held accountable to extremely high scientific standards. We and other REDD+ programs around the world could benefit enormously from the sort of larger scale stable market for forest carbon offsets that access to ICAO's CORSIA program might provide. Reports like this that use pseudoscience and opinion to thinly disguise an ideological opposition to any form of carbon offsets care nothing for the collateral damage they do to the very forest communities they pretend to represent, and are in our opinion disgraceful.

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On behalf of the Wildlife Works Mai Ndombe REDD+ project team