**FAO: President and Interim CEO Judith Simon**
**Verra**
**1 Thomas Cir NW #1050,**
**Washington, DC 20005,**
**United States**

**Brussels, 15 September 2023**

Subject: Complaint related to the registration of - and issuance to - REDD+ projects under the VCS

Dear Judith Simon,

We are writing to present you with the findings of a research project which has uncovered severe shortcomings in a number of REDD+ projects registered under the Verified Carbon Standard (VCS). We hereby register a formal grievance to Verra regarding these projects, referenced below.

These findings are the result of research conducted by the University of California (Berkeley), commissioned by Carbon Market Watch, a not-for-profit watchdog organisation. This research focused on the integrity and the quality of carbon credits issued to a number of REDD+ (avoided deforestation) projects registered under the VCS. This research has identified major deficiencies in project integrity and rigour. Shortcomings should have been identified by Verra and flagged by VVBs, and these projects should have been denied registration and the ability to issue carbon credits.

This research also highlights faults in the activities conducted by validation/verification bodies (VVBs), which we consider to have failed to correctly undertake their duties to the standard expected from a third-party auditor. The integrity of these projects should have prompted a negative review from VVBs, and we conclude that Verra has not upheld its own rules and requirements by allowing these projects to register under their standard and effectively issued carbon credits that are not environmentally sound.

Overall, our findings reveal the lack of credibility and the absence of benefits to the climate of projects registered under the VCS and the poor quality of carbon credits. We believe that it is Verra's responsibility to take the necessary steps to resolve these short-comings.

We call on Verra to execute its grievance mechanism process to:

1. Re-evaluate the projects specified in this letter, and conduct an internal investigation into the rules and registration requirements that projects must meet before they are registered and eligible to be issued carbon credits.
2. Halt the issuance of carbon credits from these REDD+ projects until the conclusion of the internal investigation.
3. Purchase and cancel carbon credits equivalent to the volume of credits wrongfully issued to the projects.
4. Investigate the role of all VVBs specified in this letter to determine whether they fulfilled their obligations with respect to their validation and verification activities relevant to the listed projects.

The problems identified are summarised in the table in Annexes 1 and 2 to this letter.

Finally, although we take due note of Verra's complaints policy, we call on you to conduct the necessary investigation free of charge to the complainant. Requiring Carbon Market Watch to pay the associated costs of this internal investigation would be to restrict access to the grievance mechanism designed to address the concerns of civil society, vulnerable groups and marginalised communities. We do not accept to be held liable for any such payments should you decide to start the investigation. It is in the interest of your own integrity and the wellbeing of the climate and local communities that you take full financial and moral responsibility for this investigation.

Yours sincerely,

Sabine Frank

Executive Director

For enquiries:

Inigo Wyburd - Policy Expert, Global Carbon Markets

inigo.wyburd@carbonmarketwatch.org

Gilles Dufrasne - Policy Lead, Global Carbon Markets

gilles.dufrasne@carbonmarketwatch.org

# Annex 1

The below table summarises input from various researchers involved in the REDD+ methodological assessment project.

| Project Details | | | | | |
|---|---|---|---|---|---|
| **Project Name** | **Project ID** | **Project Proponent and Methodology** | **Validation/ Verification Body Validation** | **Validation/ Verification Body Verification** | **Short-comings** |
| Cajambre REDD+ Project | VCS1392 | Consejo Comunitario de Cajambre BC, Canada<br><br>Verra Search Page<br><br>VM0006 | Rainforest Alliance | Spanish Association for Standardisation and Certification (AENOR) | **Forest Carbon Accounting**<br><br>Choice of Allometric Equation: In Project Description Documents (PDD) citations for equations and model sources are given, but references are not included in the references list at the end of the PDD. Saldarriaga (2011), a research paper cited as the source of an allometric equation, actually is an equation that focuses on **nutrients in water** that is completely unrelated to tree allometry.<br><br>Lack of conservativeness: Excerpt from the study (Forest Carbon Accounting Chapter), regarding belowground carbon (BGC) estimation: "We found specific choices of BGC estimation methods that were not conservative. For instance, BGC estimates from projects VCS 1392 and VCS 1775 were much higher than the alternative estimates. While both projects used methods from peer-reviewed literature, they were not contrasted with other possible peer-reviewed methods to show that their choices were conservative." |

| | | | | | |
|---|---|---|---|---|---|
| Isangi REDD+ Project | VCS1359 | SAFBOIS, SPRL PA, United States<br><br>www.congoemissions.com<br><br>Verra Search Page<br><br>VM0006 | Rainforest Alliance | Rainforest Alliance | **Forest Carbon Accounting**<br><br>Lack of conservativeness: Non-conservative choice of allometric equation by the Project Developer. They chose an equation in Djomo et al. (2010) that led to much higher above ground biomass (AGB) estimates than other possible equations provided in the same Djomo et al. 2010 study. Also, like a few others, this project is not clear about which root-to-shoot ratio or equation to calculate the BGB was used. This project stated that the BGB was estimated based on the root-to-shoot ratio for tropical forests (table 4.4 of the IPCC GPG for GHG Inventories), which includes mean values ranging between 0.20 and 0.56 with a large range in uncertainty as well. Project root-to-shoot ratio seems to be 0.37 based on AGB/BGB in Table 23 of PDD. |
| Rio Pepe y ACABA REDD+ Project | VCS1396 | Multiple Proponents<br><br>Verra Search Page<br><br>VM0006 | Rainforest Alliance | Spanish Association for Standardisation and Certification (AENOR) | **Forest Carbon Accounting**<br><br>Lack of consistency: Used different root-to-shoot ratios depending on the project document reviewed: 0.20 - 0.56 (PDD); BGB = 0.489 * AGB^0.89 (Monitoring report) (Saatchl et al. 2011) |
| The Russas Project | VCS1112 | Multiple Proponents<br><br>Verra Search Page<br><br>VM0007 | Environmental Services Inc. | Environmental Services, Inc. (2014 verification), Rainforest Alliance (2017 verification), Environmental Services, Inc. (2019 verification) | **Safeguards**<br><br>The Project Proponent is Ilderlei Souza Rodrigues Cordeiro**, a local politician for the PPS - AC** and **Vice-Mayor of Cruzeiro do Sul**, and later Federal Congressman for Acre. He has been convicted of abuse of political and economic power in 2016 state-held elections (Militãoet al, 2017, Amazonas Atual et al, 2016), sentence was upheld in 2019 (A Gazeta do Acre 2019).<br><br>Inconsistent and confusing language regarding land tenure issues: Excerpt from the study (Safeguards Chapter), "the Russas 2019 Verification Report (2019) for example. The AFOLU risk report notes that the project *'has begun the CAR* (rural land registration) *process and is working with the adjacent landowner to resolve the overlapping* (property) *claim*' (page 36 [of the 2019 Verification Report]), whereas in justifying compliance with the CCBS (Indicator G1.6 [of the 2019 Verification Report]), the VVB[1] cites the project description document and the monitoring report to conclude that there are *'no land tenure disputes'* (p. 60)." The PD claims to have full |

[1] Environmental Services Inc.

| | | | | | |
|---|---|---|---|---|---|
| | | | | | ownership over project areas, although later audits by the VVB revealed they did not have proper rural land titles and some areas of land were actively contested.<br><br>**Leakage**<br><br>Inconsistency and poor wording: In the PDD, the Russas project states that "one of the 19 communities [inconsistent language this should be households] surveyed was an immigrant community." This was then subsequently used to estimate ex-ante leakage projections. However, the monitoring report which followed after the project implementation, did a separate survey of "15 households" with none of them being recent migrants, therefore quantifying leakage outside the leakage belt as 0. This illustrates the inconsistencies between documents, which were flagged by VVBs but were eventually accepted by the VVBs because the latter was the most up to date sample. |
| The Valparaiso Project | VCS1113 | Multiple Proponents<br><br>Verra Search Page<br><br>VM0007 | Environmental Services, Inc. (2014 validation) | Environmental Services, Inc. (2014 verification, 2019 monitoring report). Rainforest Alliance (2017) | **Safeguards**<br><br>Opaque and ambiguous: Excerpt from the study (Safeguards Chapter): "The Valparaiso Project provides a clear example of poorly justified risk assessments that are inconsistent across reports, and of VVBs failing to follow up on risks identified in prior verifications (Table 6.2). The developer's risk report claimed that '*100% of local communities have been consulted*' and the auditor agreed (2014 Verification Report, p. 28). The project description document identified '*35 communities*' (in later documents referred to as '*households*') living on the project property, but provided little information about how or when consultation was carried out (2014 Project Description, p. 4). The developer later clarified and the auditor positively validated that '*no communities live within the project area, rather they live within the boundaries of the land ownership*' (2014 Validation Report, pp. 82–83).<br>At second verification, Rainforest Alliance found evidence of '*85 households*' in the project area (and 35 more in the 13 belt), far more than the developer had listed. This increased the community engagement risk to 10, which was offset by 5 points due to the fact that the project had been previously validated and verified under CCBS (2017 Verification Report, p. 63). That CCBS was used to offset risk is questionable because, for the monitoring period in question, VCS and CCB verifications were conducted simultaneously, using the same data, and were reported together on the CCB template. In other words, the vague and contradictory information about the number of affected households and consultations was the same |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | information submitted for review under CCBS. Instead of the additional certification raising standards (and theoretically offsetting risk), it simply accepted the same, low standard. Had this 'risk offsetting' not occurred, the combined risk would have exceeded the accepted threshold for external risk (20%), and the project would not have been eligible for verification. By the third verification, the higher community engagement risk in the 2017 verification, the extensive issues raised in FARs, and the sloppy or misleading information provided by the developer would provoke a close assessment by the next auditor. However, the 2019 verification, conducted again by EnviroServices, Inc., seemed to ignore new evidence of a larger number of affected families. The auditor accepted the developer's claim (repeated from the first monitoring period) that '*100% of local communities have been consulted*' (p. 36). Despite evidence to the contrary from both the previous audit and the developer's own monitoring report, EnviroServices referred to '*about 20 families in the Valparaiso communities*' and commented '*this indicator was adequately addressed in the (2014) project description document and does not need to be re-examined during this verification process. Item closed*' (2019 Environmental Services Inc Verification Report, p. 71). The auditor approved a community engagement risk of -5, again citing CCBS." |
| Cordillera Azul National Park REDD Project | VCS985 | CIMA, Cordillera Azul Miraflores, Peru<br><br>Verra Search Page<br><br>VM0007 | SCS Global Services (Verra database profile, validation report) | SCS Global Services (2013 verification), AENOR (2015, 2016, 2018 verification), Aster Global (2023) | **Forest Carbon Accounting**<br><br>Inappropriate Allometric Equation: Issues related to how the project implements the methods provided in the REDD+ methodologies. VCS985 used the same allometric equation for live trees across all forest types and does not show the DBH range of the trees included in this carbon stock estimation using allometric equations. This is problematic because it disregards the inherent structural and compositional differences among forest types. Excerpt from the study (Forest Carbon Accounting chapter): "This project also used a single wood density value of 0.62 g/cm3, based on Baker et al. 2004, for all trees." The rationale for this choice was not transparently shown in the project documents.<br><br>**Safeguards**<br><br>Lack of credibility: Excerpt from the study (Safeguards chapter): "The Cordillera Azul National Park Project is an example of a project that, although verified as compliant with VCS requirements, nonetheless gave rise to community allegations of lack of prior consultation. |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | The estimated 321,000 community members living outside the park, but described as having access to the park for subsistence hunting and fishing, were defined as secondary stakeholders by the developer and not consulted prior to validation; instead, the developer described an intention to have monthly visits '*to communities*' to provide information and get feedback (2012 Project Description, p. 190; 2013 Validation Report, p. 25). This is permissible under the standard, as the developer is responsible for defining who project stakeholders are. However, affected Kichwa communities—whose land claims were never referenced explicitly in any project documents—have filed suit against the government and the National Park for lack of FPIC and for blocking access to ancestral lands (Forest Peoples Programme [FPP], 2021). They also denounced the developer for exclusionary and nontransparent practices (FPP, 2023). Even so, Verra issued credits to the project in April 2023, following a positive verification by VVB Aster Global in July 2022 (2022 Verification Report)." |
| KARIBA REDD+ PROJECT | VCS902 | Carbon Green Investments (Guernsey)<br><br>Verra Search Page<br><br>VM0009 | Environmental Services, Inc. | Environmental Services (2013), SCS global services (SCS) (2015, 2017), Aster Global (2020), AENOR (2022) | **Forest Carbon Accounting**<br><br>Lack of transparency: In reporting the allometric equation and the minimum DBH of trees included in the forest carbon stock estimation. In the 2020 Monitoring Report, it is stated that "A list of allometric equations and densities of tree species was provided separately to the auditor at validation stage." They did reference equations by number but didn't list the equation itself, so it is not possible to see which allometric equation was actually used by this project.<br><br>**Safeguards**<br><br>Lack of adequate consultation: Excerpt from the study (Safeguards chapter) "The Kariba Project is an example of community consultation being justified through pure conjecture. The Kariba Project includes communities in four districts across different provinces in rural Northwestern Zimbabwe, an area home to more than 330,000 people (VCS 902, 2013, *Project Description,* p. 94). The developer, Carbon Green Investments (CGI), located in the United Kingdom, alleged zero engagement risk, claiming that '*locals have been informed about project details through the newsletter published by CGI. Therefore it can be assumed that more than 50% of households living within the project area who are reliant on the project area have been consulted*' (VCS 902, 2014, *AFOLU Non-Permanence Risk Assessment*, p. 9, emphasis added). Project documents prepared by Switzerland-based South Pole Carbon provided no evidence to demonstrate households had received the newsletter, that people could read and understand information about the project, |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | or that the newsletter provided any avenue for concerns to be voiced. The verifier raised two nonconformance requests, but ultimately accepted this approach to consultation, along with the developer's assumptions (VCS 902, 2012, *Validation Report*, p. 138)." |
| The Mai Ndombe REDD+ Project | VCS934 | Wildlife Works Carbon LLC<br><br>Verra Search Page<br><br>VM0009 | Det Norske Verita (USA), Inc. | DNV Climate Change Services AS (DNV) (2012, Epic Sustainability (2017), SCS global services (SCS) (2022) | **Forest Carbon Accounting**<br><br>Lack of conservativeness and transparency: Project choice of allometric equation is non-conservative. Excerpt from the study (Forest Carbon Accounting chapter): " VCS 934 used the general equation of Chave et al. (2005), which is not forest-type-specific. Unsurprisingly, we found a 60% difference between the project's AGC estimate and the mean of the six better alternative estimates for that project. We also found issues related to how the allometric equations are used."<br><br>**Safeguards**<br><br>Lack of Consultation: Excerpt from the study (Safeguards chapter): "Reports from NGOs and community-based organizations highlighted very low levels of understanding of REDD+ and problems with consultation practices. One report highlighted a '*botched awareness campaign*' by developer Wildlife Works Carbon (WWC), noting,<br><br>'*Confusion around the creation of an 'air market' and 'air sequestration' has made communities believe that they would be deprived of the air they breathe. The lack of information available in a community-friendly format is a major obstacle to the free and prior informed participation of communities in a process directly impacting their lands and livelihoods*' (Gauthier, 2018, p. 58)<br><br>Another report found the following:<br><br>'*Although WWC claims that project activities were 'selected in consultation with the local communities,' 47 Bolukiluki observers found that 70 percent of respondents had never heard of REDD+. Of the remaining 30 percent that had, only 8 people responded they felt their community had the opportunity to provide their opinion on the project's establishment.... In some cases, it appears WWC failed to consult entire villages in its concession.'* (Berk & Lungungu, 2020, p. 17) |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | Although reports such as these were readily available when auditors conducted verification, the project was approved for verification under VCS v4.2, which requires the developer to '*take all appropriate measures to communicate and consult with local stakeholders in an ongoing process for the life of the project*' (Verra, 2022d, p. 42). It appears the verifier did not review this available external information, nor did it request additional evidence from the developer to justify their consultation claims.<br>The term *consultation* appears only twice in the verification report [2022] by SCS Global (VCS 934, 2022), with a brief justification of the developer's compliance:<br><br>'*The verification team interviewed both project personnel and local community members regarding their understanding of potential costs, risks and benefits to communities.... The verification team agrees that in all cases stakeholders were aware of the projects [sic] effect on the communities and all decisions are made after consultation with stakeholders.*' (p. 18)<br><br>According to the report, the 172 '*local community members*' who were interviewed over the course of one week were individuals the auditor claimed were '*not associated with the project proponent*' (p. 7). However, all 172 were affiliated with ERA Congo (p. 7), the entity that owns the land concession and is listed as a joint project proponent alongside WWC (VCS 934, 2012, *Project Description*; 2012, *Monitoring Report*) until it became a direct subsidiary of WWC, in 2013 (VCS 934, 2022, *Monitoring Report*, p. 30)." |
| Luangwa Community Forests Project | VCS1775 | Multiple Proponents<br><br>Verra Search Page<br><br>VM0009 | SCS Global Services | AENOR (2020, 2022) SCS global services (SCS) (2019) | **Forest Carbon Accounting**<br><br>Lack of conservativeness: Excerpt from the study (Forest Carbon Accounting chapter): "We found specific choices of BGC estimation methods that were not conservative. For instance, BGC estimates from projects VCS 1392 and VCS 1775 were much higher than the alternative estimates. While both projects used methods from peer-reviewed literature, they were not contrasted with other possible peer-reviewed methods to show that their choices were conservative." |
| Ecomapua Amazon REDD Project | VCS1094 | Multiple Proponents<br><br>Verra Search Page | TÜV Rheinland (China) Ltd (Designated Operational Entity) | RINA Services SpA | **Forest Carbon Accounting**<br><br>Inconsistencies between reports: Excerpt from the study (Forest Carbon Accounting chapter): "VCS 1094 used different methods across reports: although the project documents did not include an explicit reference to root-to-shoot ratios, a ratio of 0.2055 was used based on the |

| | | | | | |
|---|---|---|---|---|---|
| | | VM0015 | (according to 2015 verification report pg 2 in pdf), TÜV Rheinland Brazil Ltd. (2013 validation report) | | ratio between AGB and BGB estimates in the project description document, whereas a ratio of 0.24 was used in the monitoring report (for tropical rainforest with AGB values above 125 Mg/ha)."<br><br>**Safeguards**<br><br>Discrepancies in land ownership: Excerpt from the study (Safeguards chapter): "The 2013 project description and validation report noted that the owner, Lap Chan, had legal title over all project lands. However the next year, the project's risk assessment noted that, in 2005, the government had issued a decree to acquire two of the five properties for extractive reserves; Mr. Chan justified his ownership by stating that he was never paid, and therefore the government's land claim had expired (VCS 1094, 2014, *Non-Permanence Risk Assessment*, p. 7). It is unclear whether the auditors flagged this in the first round of verification, but their report makes no mention of the issue (VCS 1094, 2015, *Verification Report*). The 2020 report, however, raised land ownership as a possible concern, citing federal law from 2000 that established an extractive reserve overlapping approximately 74% of the project area (VCS 1094, 2020, *Verification Report*, p. 39).[2] The VVB consulted the institution responsible for managing the reserves, which responded that it had '*already denied support to the project, because of legal conditions*,' and the auditor found that five project properties were listed as pending in the Pará state rural land cadaster (p. 39). With legal rights to the project area unclear, the VVB issued a CAR, which was resolved and converted to a forward action request. The project was verified, and the VVB simply noted, '*This issue must be re-evaluated in the next monitoring period*' (pp. 79–80). In April 2022, The Association of Residents of the Mapuá Extractive Reserve (AMOREMA) took legal action against the project developers, alleging the companies are selling credits for private gain on land in the public domain, and for false claims about using the sale of credits to contribute to traditional populations. AMOREMA is calling for the credits to be nullified, and for both civil and criminal action to be taken against the developers (Publica, 2022; Quantum Commodity Intelligence, 2022). The developer continued to actively sell credits on the voluntary market, and as of August 1, 2023, a third verification had not occurred. From a safeguards perspective, the VVB did not ensure that '*discrepancies with regard to land ownership*' were resolved prior to verification, as the policy requires. Moreover, the auditor did not assess the implications of this overlap in relation to the risks for affected communities." |

[2] On the same page, the VVB states again (although with different statistics) that "it's worth mentioning for legal purposes (land ownership, land management and VCUs titularity) that around 60% of the Project area is overlapping two Federal conservation unities (RESEX)" (VCS 1094, 2020, Verification Report, p. 39).

| | | | | | |
|---|---|---|---|---|---|
| | | | | | **Permanence**<br><br>Underestimation: This project scored a natural risk score of 0%. However, in the REDD+ report, the researchers conducted an "observational analysis using remote-sensing data for 100 year stand clearing disturbances (i.e., all natural disturbances, including fires)", giving it a natural risk score of 11%. This shows that this project's risk estimation is unrealistic and not conservative enough with natural risk ratings. |
| Lacandon ‚Äì Forest for life REDD+ Project | VCS1541 | Multiple Proponents<br><br>Verra Search Page<br><br>VM0015 | AENOR (project description pg 7, 2016 validation report) | AENOR (2016 verification), S&A Carbon LLC (2021 verification) | **Forest Carbon Accounting**<br><br>Lack of specificity in allometric equation choice: The project specifies distinct forest strata but uses the same allometric equation for estimating carbon stocks in three forest types. Rationale for this approach is not transparently reported. Also, lack of transparency in reporting the minimum DBH of trees included in the forest carbon stock estimation.<br><br>**Permanence**<br><br>This project severely underestimates its natural risk score, they quantified 7% natural risk score, however external analysis by Anderegg et al. (2022) found a natural risk score of 80.8% which is above the >35% natural risk rating threshold for project failure (Table 3). |
| Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary | VCS1650 | Royal Government of Cambodia (RGC), Ministry of Environment<br><br>Verra Search Page<br><br>VM0015 | SCS Global Services/SCS (2014 validator report) | Environmental Services Inc. (2017 monitoring report, 2018 verification report), SCS Global Services (2017 verification report) | **Permanence**<br><br>This project severely underestimates its natural risk score; they quantified 5% natural risk score, however external analysis by Berkeley University found a natural risk score of 81.8% which is above the >35% natural risk rating threshold for project failure (Table 3). |
| Jari Pará REDD+ Project | VCS1811 | Multiple Proponents | RINA S.p.A (RINA) | RINA S.p.A (RINA) | **Safeguards** |

| | | | | | |
|---|---|---|---|---|---|
| | | Verra Search Page<br><br>VM0015 | | | Lack of evidence: Excerpt from the study (Safeguards chapter): "The developers identified 98 communities in the project zone and described '*interviews and meetings* (and) *participatory workshops*' (VCS 1811, 2019, *Project Description*, p. 35) but had '*consulted*' with only six communities (VCS 1811, 2019, *Validation Report*, p. 97). Validation was carried out simultaneously for VCS and CCB by VVB RINA, and the auditors noted issues with stakeholder consultation from the outset, flagging consultation in CARs. RINA explained the requirement for all relevant stakeholders to be consulted, defined for the developer what '*full and effective participation*' means, and reminded the developer of the need to carry out FPIC for validation under CCBS (p. 96). In response, the developers did a new round of outreach, inviting representatives of 53 communities to a meeting, but RINA's review found that only 13 of the 53 were located in the project area, and only five new communities attended the event (pp. 96–97). Nevertheless, the auditor was ultimately conciliatory and supportive, concluding it was '*satisfied that the developer is committed to expand even further the participation to institutions recognised by all communities identified in the Project Zone*' and noting that,<br><br>'*Even considering that the PPs did not conduct a consultation with 100% of the traditional communities in the area, it is evidenced that there is no kind of restraint, impediment or conflict over access to resources between the Jari Group and the communities*. (pp. 97–98)'<br><br>The VCS verification report, conducted simultaneous with validation, included no further comments regarding stakeholder consultation and only noted concerns in a forward action request, claiming that '*effective communities [sic] consultation…is not in the VCS standard and therefore is to be resolved by the first verification of the CCB Standard*' (VCS 1811, 2019, *Verification Report*, p. 14). RINA's trust in the developers is striking, given that during the years covered by the first audit (2014–2017), the landowner and one of the proponents (Jari Group) were under active investigation by the Brazilian government, and subsequently by the Forest Stewardship Council (FSC), for a series of illegal actions, including the violation of traditional and human rights in forestry operations. These findings prompted the FSC to suspend Jari Group's certification in September 2017, and in March 2019, the FSC board of directors decided to disassociate from Jari Group. These serious allegations of illegal actions were never mentioned by the developers or RINA and did not affect Verra certification. The project was registered in 2020 and issued credits from 2019 to 2021. (No further VCS monitoring or verification reports have been published, however, and as of August 1, 2023, the project is on hold while it undergoes a quality control review by Verra.)<br>The Jari/Pará REDD+ Project is one of many we reviewed in which developers cited outdated or incorrect information about local communities, consulted with only a small (and unspecified) |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | number of households, and provided superficial and self-referential justifications in response to CARs. Nevertheless, these issues were largely overlooked by VVBs. In other words, the *VCS Standard* was insufficient to ensure developers conducted effective household consultation, and when independent audits documented substandard practices and sought corrective action, this did not lead to substantive change. In fact, auditors uniformly accepted the developers' responses and approved projects despite the absence of clear evidence the safeguard standard had been met."<br><br>Concerns over land ownership: Excerpt from the study (Safeguards chapter): "Whereas Jari identified 98 communities, the Brazilian public prosecutor identified 150 and was investigating the company's use of violence against community members claiming land tenure rights (FSC, 2019). This investigation prompted the FSC to conduct its own inquiry into the Jari group. The FSC found that the first stakeholder allegations were brought against the company in 2012 and increased starting in 2015. The FSC concluded that evidence existed beyond a reasonable doubt that Jari Group had violated community rights within its forest management area, as well as conducted illegal logging and timber laundering." |
| GuateCarbon REDD+ Project | VCS 1384 | Consejo Nacional de Áreas Protegidas (CONAP)<br><br>Verra Search Page<br><br>VM0015 | AENOR International S.A.U. | AENOR International S.A.U | **Safeguards**<br><br>Land tenure issues: Excerpt from the study (Safeguards chapter): "The reserve is a protected area, created before the signing of Guatemala's Peace Accords, at a time when an estimated 1 million people had been displaced, including in the Petén, where the reserve was created. Today, dozens of communities have unclear land titles in this region; tenure disputes are prevalent; and the government (including CONAP) has repeatedly used evictions, often with violent force, to 'manage' the reserve (Inter-American Commission on Human Rights [IACHR], 2017).[3] The VCS project has multiple goals, including to increase enforcement of the protected area (VCS 1384, 2017, Project Description, pp. 2, 8). The AFOLU risk report, validated in 2015 and cited again in the June 2017 verification report, noted, |

[3] Specifically, human rights bodies describe

> A pattern of human rights violations in the execution of evictions, including the violation of the right to consultation and the failure to provide advance notice, which is usually carried out in summary fashion and with violence by members of the National Civilian Police, the Army and the National Council of Protected Areas (CONAP), and involve burning and destruction of homes, food, animals, without any arrangement for return or relocation or any real chance for due process or access to justice. (IACHR, 2017, p. 115)

| | | | | | |
|---|---|---|---|---|---|
| | | | | | '*The Candelaria area has also been identified as an area with potentially illegal occupation, however this area is estimated to be less than 5% of the project area…Technically there are no disputes over the legal recognition of land ownership….because any known areas of land use disputes are illegal in nature…and have either been excluded from the project area or they are less than 5% of the project area*.' (VCS 1384, 2015, AFOLU Non-permanence Risk Assessment, pp. 7–8)<br><br>Labeled as '*occupiers*' rather than affected communities, these families in the Candelaria were never referenced in any reporting on safeguards. No clarification requests or CARs were requested by VVBs to better understand the history of land claims in the Candelaria region or to assess the potential risks the project could pose to families in the area. On June 2, a few weeks before the verification report was published (June 23, 2017), 111 families (about 450 people, mostly children) comprising the community of Laguna Larga in the Candelaria region were violently evicted from their homes (Morales et al., 2017). Approximately 1,800 police and military, along with representatives of the state agency for protected areas, oversaw the eviction in violation of international standards. The families' belongings were destroyed, along with at least 77 homes; the local school was reappropriated as a military base. The trauma of the eviction caused many to relive experiences of wartime persecution. The IACHR (2017) reviewed the case and granted precautionary measures to the community, but the government has since done little to comply, and the families continue to live in tenuous conditions at the Guatemala-Mexico border. The eviction made national news and was denounced by international human rights bodies, yet the updated project description produced in October 2017 made no mention of the Candelaria region or the community of Laguna Larga.<br>As of August 2023, no further verification reports had been posted, although the Verra website noted the project was registered in 2020 and was validated and verified under CCBS. As of June 2023, this project had not issued any credits. Mention of this eviction may never appear within project reporting, yet the affected families continue to experience negative impacts. Here, the 'do no harm' protections of VCS policy excluded from consideration, at the outset, some of the most vulnerable communities in the project area." |
| Ntakata Mountains REDD | VCS1897 | Carbon Tanzania Kent, United | Epic Sustainability | 1: Epic Sustainability (2020), 2: Aster | **Permanence**<br><br>Low fire risk score: In its 2022 verification report, auditors issue a CAR about the risk |

| | | | | | |
|---|---|---|---|---|---|
| | | Kingdom<br><br>Verra Search Page<br><br>VM0007 | | Global LLC (2022) | assessment for fires. Despite a low fire risk score, auditors describe observing multiple fires without anyone trying to put them out or mitigate during their site visit. The CAR is ultimately resolved without any change to the risk score. |

# Annex 2

Projects that have a natural risk score of 0% compared to external analysis by Anderegg et al. (2022) (supplementary material) natural risk score

| Project ID | Natural Risk Score (%) in project documentation | External analysis Natural Risk Score |
|---|---|---|
| VCS1094 | 0% | 11.3% |
| VCS1622 | 0% | 37.4% |
| VCS1503 | 0% | 10.7% |
| VCS844 | 0% | 23.1% |
| VCS818 | 0% | 23.2% |

Reversal risk scores for projects which were found to have >35% natural risk based on external analysis by Anderegg et al. (2022) (supplementary material), this is the risk of project failure that is attributable to natural phenomena.

| Project ID | Natural Risk Score (%) in project documentation | External analysis Natural Risk Score |
|---|---|---|
| VCS1360 | 1% | 62.5% |
| VCS1689 | 2% | 56.9% |
| VCS1650 | 5% | 81.8% |
| VCS1541 | 7% | 80.8% |
| VCS977 | 1.75% | 36.6% |
| VCS1622 | 0% | 37.4% |

| | | |
|---|---|---|
| VCS1654 | 4% | 65.3% |
| VCS1953 | 1.75% | 62.5% |
| VCS1118 | 3% | 47.6% |
| VCS1325 | 3% | 41.5% |
| VCS1477 | 2% | 58.3% |
| VCS875 | 3% | 81.9% |
| VCS832 | 1.5% | 44.2% |
| VCS1900 | 3% | 90.2% |
| VCS1326 | 3% | 36.9% |
| VCS1403 | 2.5% | 36.1% |