

THE GREAT GREEN RUSH:

THE EXPONENTIAL RISE AND
SOCIAL IMPACTS OF FOREST
CARBON OFFSET PROJECTS
IN THE DRC

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Finally, we extend our deep gratitude to the frontline communities and organisations working tirelessly to defend tropical forests and human rights in the Congo Basin and beyond.



EXECUTIVE SUMMARY

The Democratic Republic of Congo (DRC), with its vast forests and peatlands that absorb more CO₂ annually than the Amazon, has positioned itself as a 'solutions country' in addressing global climate and biodiversity crises. Central to the government's New Climate Agenda is the effort to attract essential funding for forest protection through voluntary carbon markets (VCM). However, forest carbon offsetting schemes have faced mounting criticism regarding their environmental and social impacts, and concerns that they may delay urgently needed climate action in wealthier nations.

This study by Rainforest Foundation UK (RFUK) examines the rapid increase of forest carbon projects across the country from the perspective of local and Indigenous communities. The findings raise serious ethical and legal concerns, revealing widespread illegalities in project attribution, human rights violations and other impacts that undermine efforts to promote effective and participatory forest management.

Overall, the report finds that:

- An increasing amount of land across the DRC has been allocated for forest offsetting projects for the voluntary carbon market. We were able to identify **71 projects covering approximately 103 million hectares (See Figure 1)**¹ - almost half of the entire country area.² Tshopo, Mai Ndombe, Equateur, North Kivu and Tshuapa are the provinces with the highest number of projects. In addition, **other deals amounting to over 80 million hectares** have been
- signed between government authorities and private investors that are not area-based (meaning they are not based in specific geographies), many of which are likely to overlap with existing projects.³
- It is challenging to determine the exact status and surface area of carbon projects in the DRC due to the **lack of information online**, with most coming from informant networks and field documentation. The national carbon registry, which was published online only in October 2024, contains limited and fragmented information, despite this being a legal requirement under national legislation on carbon and REDD+ projects.⁴ The number and extent of carbon projects in the country are therefore likely to be higher.
- **Only 15 carbon projects appear to be validated at the national level to sell credits** in accordance with the homologation procedure as per Ministerial Order 047, based on the information provided by CN REDD representatives.⁵ Of these, only the Wildlife Works Carbon (WWC) project in Mai Ndombe is currently certified by the international offset standards body and registry Verra, following the withdrawal of the Isangi REDD+ concession in June 2023 amid allegations of irregularities. Together with the Gold Standard-certified Ecomakala reforestation and energy efficiency project in North Kivu, these are only three forest-based offset projects in the DRC to have sold credits in the VCM so far, based on available information.

1 This includes active and non-active projects whose status could not be confirmed.

2 This includes ongoing VCM projects, planned projects, ended projects and those whose status could not be confirmed. The Kanaka Management Services (KMS) National REDD project was also included because, albeit it has registration has been rejected by Verra, contracts signed with communities have not been cancelled yet.

3 This is a conservative estimate that covers the deal signed by the Congolese Environmental Agency with Blue Grace Energy Bolivia (see [article here](#)). Other non-geography-based deals also exist, such as the Memorandum of Understanding between the DRC government and the US-based firm dClimate, which was signed at COP28 in Dubai in 2023, for which we do not have information concerning the total area covered (See *dClimate Signs MoU With Democratic Republic of Congo to Protect the Congo Basin Rainforest and Peatlands*) and a jurisdictional REDD project in Equateur province to be implemented by the US-based firm Terra Global which has stated to have already signed an agreement with the provincial government at the 20th Session of the UN Forum on Forests (See [Équateur : La société Terra Global Capitol s'installe officiellement après un accord signé avec le Gouverneur de Province, Losako CD](#)). Furthermore, the American firm EQX Biome had also put forward a 400 USD million bid for 27 oil blocks in early 2023, with the aim to turn them into REDD+ projects (See [Interview: US firm bids to turn DRC oil blocks into green projects](#), Quantum Commodity Intelligence).

4 Ministerial Decree 047/2018 on Homologation of REDD project and its Annex I (Manuel de Procédure pour l'homologation de projets REDD+, pg. 12). The registry has now been published but it does not contain any information.

5 Based on information received from CN REDD in Kinshasa in August 2024, although RFUK and APEM researchers could not see the list of the validated projects. A carbon registry has now been published and is available at: <https://imadis-group.com/rdc/> but it contains limited and fragmented information.

- **Among the key players in the carbon offsetting industry in the DRC are many former logging companies** that have converted or are converting their concessions. Our findings indicate at least 36 conservation concessions covering approximately seven million hectares in the country.⁶ Many of these forests have already been logged, raising questions about the additionality of the projects.
- **The process of converting former timber concessions has been marred with irregularities.** Official information available from the Ministry of Environment shows that in many cases, contracts have either been terminated or companies have received a formal notice (warning) to regularise their situation within a strict timeframe.⁷ However, many of these companies are still operating illegally despite the government directives.
- **Systematic illegalities permeate newly created conservation concessions** with recurrent violations of the Forest Code and the 2011 Ministerial Order regulating the award of conservation concessions. These include allocations beyond the 500,000-hectare limit outlined in Article 92 of the Forest Code; allocation by a non-competent authority; and allocation without consultation of affected communities.
- **Secrecy and lack of transparency surround the carbon industry in the DRC.** There is limited information available on the companies implementing forest carbon projects, raising serious questions over the government's due diligence in awarding these concessions. The sparse information that we could obtain shows that most project developers have no track record in the industry, and some of them are not even legally registered at the time their concessions were awarded.

Our field research of carbon offset projects across four provinces found:

- **A striking lack of respect for Free, Prior and Informed Consent (FPIC) and insufficient consultations with affected communities**, especially women and youth, despite national guidelines and ministerial decrees mandating full and effective participation of all stakeholders in REDD+/carbon initiatives.⁸
- **Existing and planned forest carbon projects are causing social harms**, damaging social cohesion and exacerbating the risk of intra and inter-community conflicts, elite capture and human rights violations.
- **There is weak evidence of tangible benefits for local populations** in terms of revenues, economic opportunities or improved livelihoods (this is partly due to the lack of formal benefit-sharing regulations and the fact that most projects have not yet been validated at the national level). The complex structure of these projects and the number of intermediaries involved mean that promised funding rarely reaches the local level, especially as the price of carbon on the VCM has crashed in recent years.
- **The expansion of forest carbon projects is detrimental to collective land tenure**, preventing the development of right-based and community-oriented conservation alternatives such as community forestry (CFCLs). Carbon projects have halted, disrupted or co-opted ongoing CFCL initiatives, often preventing communities from obtaining their title and accessing their forest resources.

⁶ The exact figure may change due to discrepancies between the different sources of information including the Legal Review of Forest Titles (2024), the National Forest Atlas (2024) and other sources.

⁷ Final Report of the Legal Review of Forestry Titles of the Ministry of Environment and Sustainable Development (MEDD), January 2024.

⁸ Arrêté Interministeriel 026/2017 fixant le cadre des directives nationales sur le consentement libre, informé et préalable dans le cadre de la mise en œuvre de la REDD+ ; Ministerial Decree 047 on Homologation of REDD+ projects ; Law 2022 on the Promotion and Protection of Indigenous Pygmy People.

Overall, we found little evidence of climate impact:

- **It is nearly impossible to assess the actual impact of forest carbon projects in terms of avoided deforestation and/or emission reductions** due to the lack of reliable and accurate data from project implementers and the Congolese government.
- **The jury on high-integrity carbon markets is still out.** While proponents of carbon markets may argue that these findings highlight the need for high-integrity carbon offsets, previous research by RFUK and others reveals several weaknesses in leading certification standards. These include flawed carbon accounting methodologies, potential conflicts of interest between companies and certifying bodies, and price volatility. In countries like the DRC, characterised by weaker governance, this is likely to lead to a 'race to the bottom' effect, with lower-quality projects gaining market share. The continued emphasis on the VCM may be diverting attention and resources away from more proven rights-based and non-market-based approaches.
- **Some positive alternative models of payments for environmental services (PES) beyond carbon markets** exist in the DRC and could be scaled up. Upcoming research by RFUK shows that these models are most effective when rooted in enabling conditions such as secure community land tenure, strong local governance and simpler transaction costs.

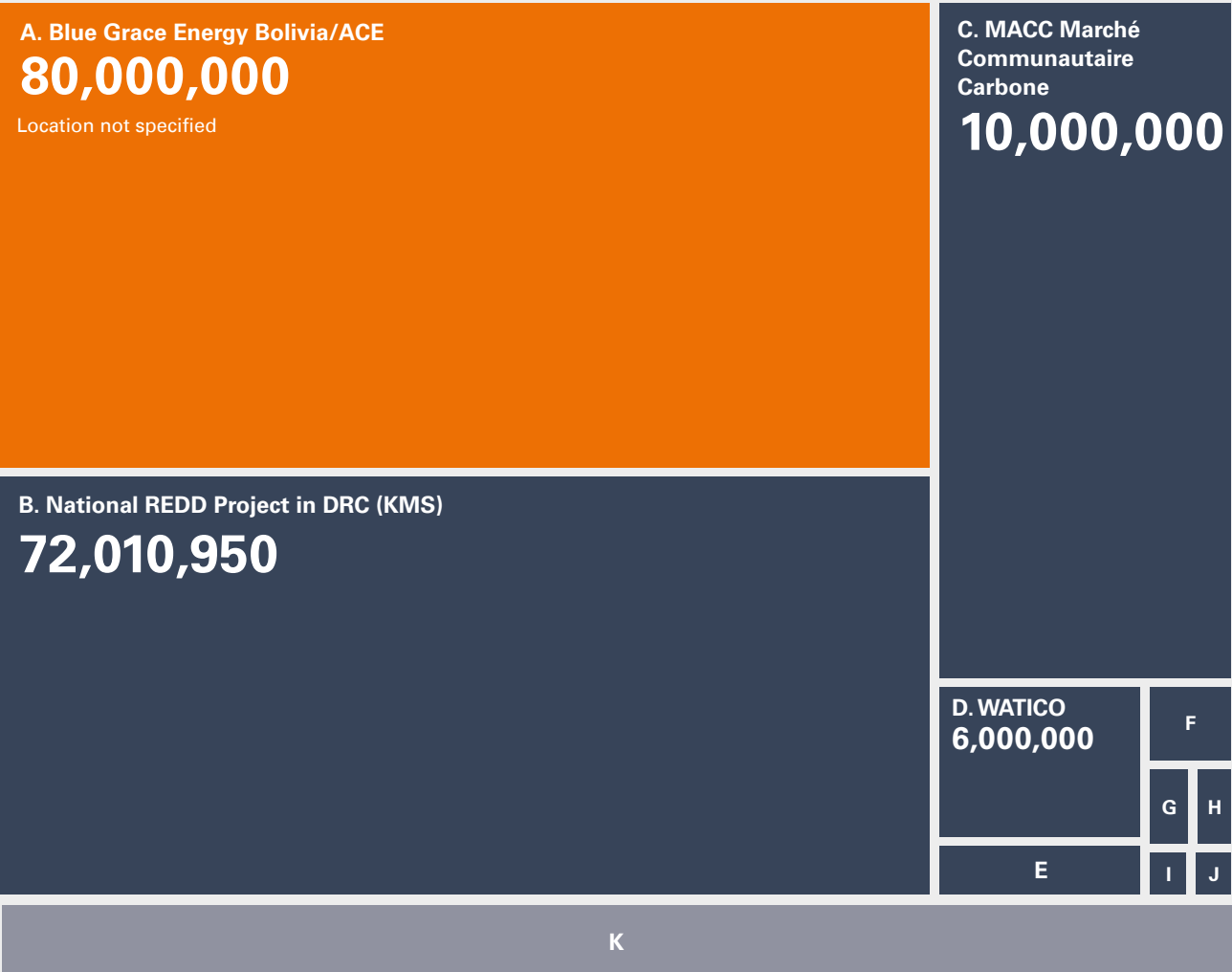
Our general recommendations include:⁹

- **The DRC government should place a moratorium on new voluntary forest carbon offset projects and conservation concessions until such time as it has adopted a robust legal and institutional framework to regulate such schemes, and in coherence with other laws and policies related to land and forest governance.**
- **The DRC's international partners and the private sector should invest in non-market and rights-based alternatives to carbon markets that channel funding more directly to local communities.**
- **Verra should conduct an independent and impartial verification of the DRC projects in its pipeline to assess and ensure their respect for social and environmental safeguards.**
- **Client companies should accelerate efforts to decarbonise their supply chains to reduce reliance on offsetting.**
- **Civil society and Indigenous organisations should conduct awareness-raising and capacity-building activities with forest communities so that they can better understand and exercise their rights in relation to offsetting projects.**

A synoptic table at the end of the report (Annex I) summarises the overall situation of the selected forest carbon projects in the DRC.

⁹ Full targeted recommendations are presented at the end of the report.

FIGURE 1: OVERVIEW OF FOREST CARBON PROJECTS IN THE DRC (IN HA)



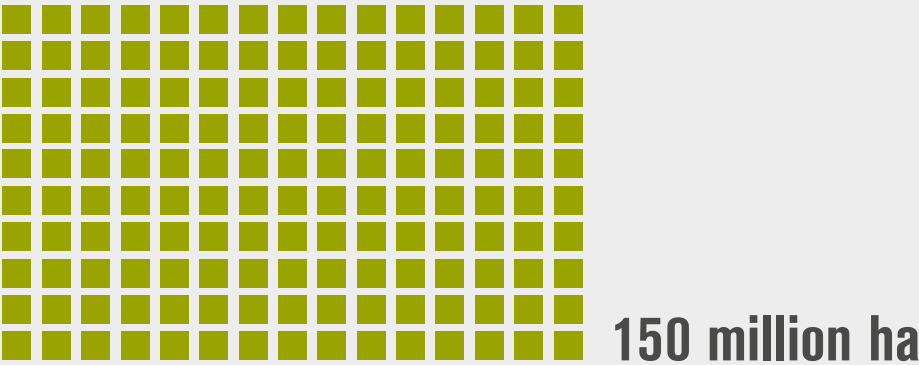
● Non geography-based deals ● Geography-based deals

	Project name	Surface (ha)
A	Blue Grace Energy Bolivia/ACE	80,000,000
B	National REDD Project in DRC (KMS)	72,010,950
C	MACC Marché Communautaire Carbone	10,000,000
D	WATICO	6,000,000
E	Sankuru Peace Forest Grouped REDD Project	2,190,831
F	DRC REDD Carbon Credit Harvesting Project	1,346,360
G	Tshopo Lomami Grouped REDD Project	717,665
H	Itombwe	648,989
I	Kokolopori bonobo peace forest grouped REDD project	421,000
J	NKUBA REDD project	408,778
K	62 Projects (see Annex 1 page 50 for details)	less than 294,014

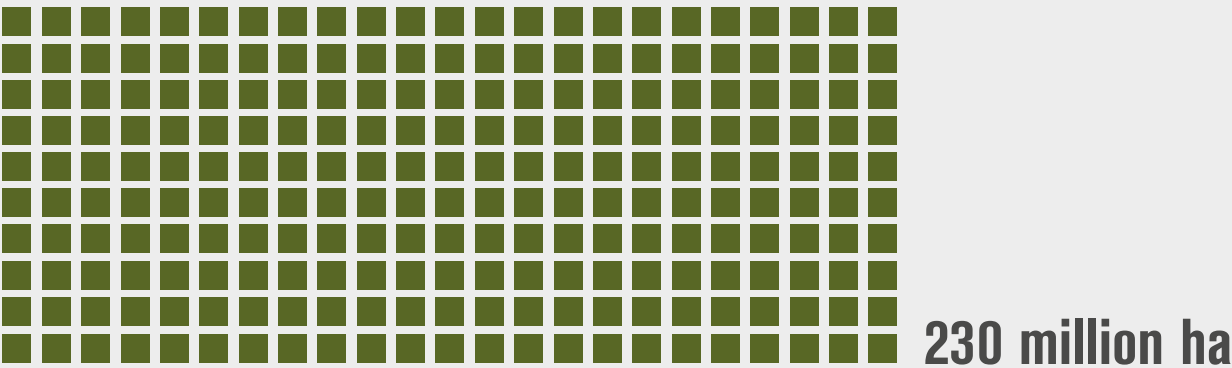
4 Non geography-based deals for which the area and location has not been specified

FIGURE 2: THE EXTENT OF FOREST CARBON PROJECTS IN RELATION TO DRC'S OVERALL SIZE AND FOREST

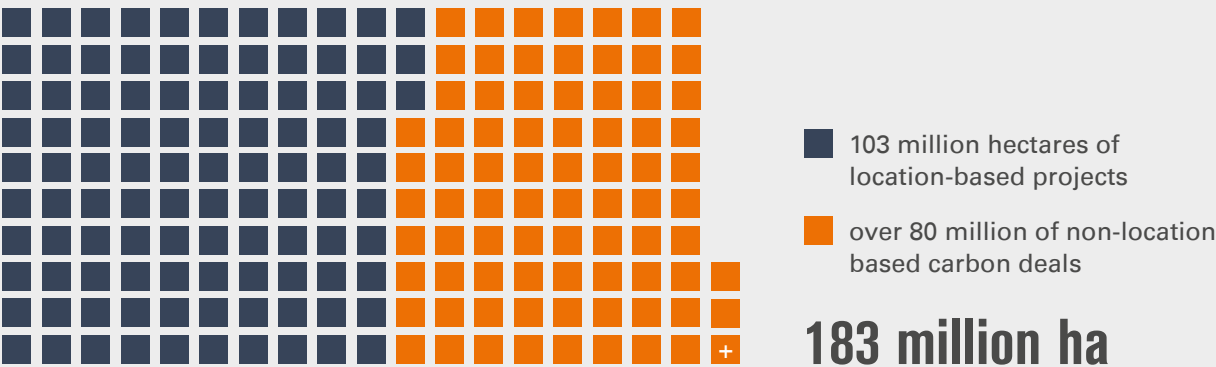
DRC Tropical Forest Area (approx.)



Total country area



Carbon Offset projects - geography and non-area based projects



Each box equals one million hectares

GLOSSARY

ARMCA	DRC Carbon Market Regulatory Authority
APEM	Actions pour la Promotion et Protection des Peuples et Espèces Menaces
CAFI	Central African Forests Initiative
CFCL	Local Community Forest Concession
CLD	Local Development Committee
CN REDD	National REDD Coordination
CSO	Civil society organisation
FONAREDD	Fond National REDD
FPIC	Free, Prior and Informed Consent
ICVCM	Integrity Council for the Voluntary Carbon Markets
IP&LC	Indigenous Peoples and Local Communities
MEDD	Ministry of the Environment and Sustainable Development
NDC	Nationally Determined Contributions
NMA	Non-market approaches (in the context of the UNFCCC/Paris Agreement)
PES	Payments for Environmental Services
REDD	Reducing Emissions from Deforestation and Forest Degradation
RFUK	Rainforest Foundation UK
tCO₂eq	Metric tonnes of CO ₂ equivalent
UNDP	United Nations Development Programme
UNFCCC	United Nations Framework Convention on Climate Change
UN-REDD	United Nations Programme for Reducing Emissions from Deforestation and Forest Degradation
VCS	Verified Carbon Standard
VCM	Voluntary Carbon Market
WWC	Wildlife Works Carbon

1. BACKGROUND

1.1 INTRODUCTION AND RATIONALE FOR THE RESEARCH

The Democratic Republic of the Congo (DRC) is home to the world's second-largest tropical forest and its largest terrestrial carbon sink. Spanning 150 million hectares, or over 60% of the Congo Basin, these forests are rich in biodiversity and vital to the lives of tens of millions of Indigenous and other forest-dependent people. Despite this, most communities lack rights to the lands they have inhabited and protected for generations. This lack of tenure security is exacerbated by weak governance, unclear legal frameworks and overlapping claims leading to disputes between communities and other land users such as logging companies and protected area managers.

With the DRC ranked among the bottom fifteen countries in the 2024 UNDP Human Development Index¹⁰ and approximately 90% of its population lacking access to electricity and basic services, the country faces the dilemma of balancing its pressing development needs while conserving its climate-critical forests and protecting the rights of its citizens.

Although historically lower than in other tropical forest countries, deforestation rates in the DRC have been rising in recent years, with 7.45 million hectares of humid primary forest lost between 2002 and 2024.¹¹ Most studies attribute this to population growth, fuelwood collection and 'slash and burn' agriculture. However, emerging research indicates that extractive industries and associated infrastructure development may pose a greater threat by opening up previously intact forest areas to new forms of exploitation, a phenomenon known as the 'cascade of deforestation'.¹² These complexities underscore the need for more nuanced deforestation analyses and policy prescriptions that consider historical trends and land-use planning needs.



¹⁰ See [Human Development Report 2023/2024](#), UNDP, 2024.

¹¹ [Global Forest Watch](#).

¹² See [Use it and lose it - Industrial logging and its role in deforestation in the Democratic Republic of Congo](#), Rainforest Foundation, UK, 2021.

The Congolese government has long pursued a development model based on the extraction of its vast natural resources, notably through its recent attempts to auction 30 oil and gas blocks¹³ and to lift a 20-year national moratorium on new logging concessions.¹⁴ At the same time, it has promoted itself as a 'solutions country' to the climate crisis due to its globally significant deposits of critical transition minerals, renewable energy potential and the vast carbon stored in its forests and peatlands.

The Congolese government has long sought to leverage forest carbon on the international voluntary carbon offset markets (VCM).¹⁵ 'Net-zero' commitments, corporate 'carbon neutral' claims and the finalisation of Article 6 of the Paris Climate Agreement establishing an international carbon trading regime have, in turn, all significantly increased demand for land for offset projects in recent years.

Fifteen years after the DRC embarked on the Reducing Emissions from Deforestation and Forest Degradation (REDD+) process, forest carbon offsetting has not yielded significant positive results in reducing deforestation or improving the lives of forest communities.¹⁶ Meanwhile, international voluntary carbon markets have faced increasing scrutiny from the media, environmental campaigners and researchers due to concerns over the quality of the credits sold¹⁷ and the social risks posed by such projects.¹⁸

The purpose of this report is to shed light on the exponential rise of forest carbon offsetting projects in the DRC and their impact on forests, forest communities and land governance. It aims to present the impacts of these projects from the perspective of Indigenous Peoples and other local communities (IP&LCs).

Following this introduction, **Section 2** provides an overview of the international architecture of REDD+ and carbon offsetting and of their historical and political context in the DRC, including an analysis of the efficacy of existing national laws, regulations and safeguards. **Section 3** gives a stocktake of the forest carbon initiatives in the DRC and then presents a selection of case studies which have been documented through field and desk-based research. **Section 4** offers

possible alternatives to carbon markets which can better respond to the need for more effective, stable and direct funding for IP&LCs. **Section 5** concludes with recommendations to duty-bearers such as the Congolese government, its international partners and certification bodies.

1.2 RESEARCH METHODOLOGY

The study was realised through desk-based research, including a review of official documents, academic and 'grey' literature and other relevant sources, such as the project documents contained in the Verra registry, together with fieldwork and semi-structured interviews with community members, civil society and government representatives, researchers and forest carbon project implementers themselves. Three field missions were also carried out by national and international researchers in Equateur, Tshopo and Mai Ndombe, selected due to the high number of forest carbon projects in these provinces. Other field sites in North Ubangi and Tshopo provinces could not be visited due to logistical or security reasons, but first-hand testimonies and information were gathered through interviews and exchanges with informants and grassroots organisations in these provinces and in Kinshasa.

The field missions took place between May and August 2024. Several affected communities were consulted based on their accessibility and proximity to forest carbon projects. The research team visited fifteen villages: three in Bikoro territory (Equateur province), seven between Banalia and Bafwasende territories (Tshopo province) and five in Inongo territory (Mai Ndombe province). In each community, semi-structured interviews were conducted through community meetings and focus-group discussions with specific segments, including women, Indigenous Peoples and youth. A female researcher led the focus group with women to provide a safe space for them to express themselves freely. Individual interviews were also held with members of Local Development Committees, village elites, school directors and teachers, provincial authorities and local civil society representatives to ensure a diverse range of perspectives and to triangulate information. Quotes from informants have mostly been anonymised for security reasons.

13 [In Congo, a carbon sink like no other risks being carved up for oil](#), Mongabay, 2022.

14 See RFUK and APEM, [DRC Forest Concession Compliance Portal](#).

15 See [Carbon Markets in the Democratic Republic of Congo, Conference Report](#), Katja Biedenkopf and Anastasia Steinlein, 2023.

16 See [The context of REDD+ in the Democratic Republic of Congo: Drivers, agents and institutions](#), 2nd edition, Kengoum, F.; Pham, T.T.; Moeliono, M.; Dwisatrio, B.; Sonwa, D.J., 2020.

17 See [Action needed to make carbon offsets from forest conservation work for climate change mitigation](#), *Science*, 2023, and [Quality Assessment of REDD+ Carbon Credit Projects](#), Berkeley Public Policy, The Goldman School Berkeley, Carbon Trading Project, 2023.

18 See [Delta Air Lines faces lawsuit over \\$1bn carbon neutrality claim](#), The Guardian, 2023.

The findings from both field and desk research were shared with the companies involved where contact details were provided. Their responses have been incorporated into the case studies where supporting evidence was provided, and full responses are included in the annex at the end of the report.

To assess the socio-economic impact of forest carbon projects from the perspectives of local communities, the research team evaluated them against internationally recognised standards such as the REDD+ Cancun Safeguards established by the UNFCCC. These safeguards aim to prevent and mitigate potential negative impacts on the rights, lands and lives of IP&LCs. Although their efficacy has been questioned due to their broad formulation and the discretion they afford to states regarding implementation, they nonetheless provide a useful framework for assessing the socio-economic impact of carbon projects. The DRC has also developed a document interpreting these safeguards in the national context and has reported on its progress against them in its submission to the UNFCCC (2009–2021).¹⁹

Additionally, this study aims to determine the conformity of forest carbon projects with the rule of law in the DRC by examining these projects against several key legislative and regulatory texts. These include the 2002 Forest Code (Law No. 011/2002), the 2011 Ministerial Decree on the Attribution of Conservation Concessions (Ministerial Order 011/27), the 2018 Ministerial Order for the homologation of REDD+ projects (Ministerial Order 047/2018), the 2017 Ministerial Order on Free, Prior and Informed Consent (FPIC) in the context of REDD+ Projects (Ministerial Order 026/2017) and the 2022 Law on the Promotion and Protection of Indigenous Pygmy People (Law 22/030). This list is non-exhaustive, and other legal texts have been consulted as necessary and referenced throughout the study.

Drawing on this analysis of existing legislation, the study also assesses the legal and regulatory challenges to ensuring the accountability of forest carbon projects. Where information was available, we also sought to assess the environmental credentials of the projects in terms of emission reductions and mitigating forest loss.

According to this document, all REDD+ and forest carbon projects in the DRC should:

1. Promote transparency and good forest governance (Cancun Safeguard 2).
2. Promote the emergence of new economic opportunities, access to employment and income-generating activities and access to capital for local and Indigenous communities (Cancun Safeguard 3).
3. Ensure the effective participation of all stakeholders, including local and Indigenous communities, ensure the respect for FPIC, strengthen social cohesion of riparian communities and ensure participation of women and other vulnerable groups (Cancun Safeguard 4).

¹⁹ First DRC submission to Safeguard Information System (SIS), *Premier résumé d'information de la RDC sur la prise en compte et le respect des sauvegardes REDD+*, 2022.

2. THE LEGAL AND POLITICAL CONTEXT OF CARBON OFFSETTING IN THE DRC

2.1 THE CONCEPT OF CARBON MARKETS, ITS EVOLUTION AND ITS CRITICISM

The concept of carbon credits originated with the 1997 Kyoto Protocol, which introduced carbon offsetting as a key component of international climate policy. This mechanism allows polluting countries and companies in the Global North to finance conservation projects in the Global South to ‘cancel out’ their carbon emissions. Since then, market-based REDD+ has evolved into a multibillion-dollar industry, promoted by governments, international conservation organisations and corporations to limit global CO₂ emissions to 1.5°C above pre-industrial levels, as outlined in the 2015 Paris Agreement.²⁰

The concept of ‘net-zero’ is based on the idea that an entity can continue polluting – or even increase its emissions – by supporting emissions reduction efforts elsewhere, notably through offsetting. This approach is rooted in the logic that nature must be given an economic value through the functions and ‘ecosystem services’ it provides to human society. Avoided deforestation projects, which prevent emissions by conserving forests, became the first and largest type of carbon offset projects, representing over 40% of the current voluntary market.²¹

Over time, the carbon market has been beset with problems, including a lack of oversight and regulation, human rights abuses and greenwashing, with numerous media reports, NGO investigations and academic studies finding that most of such projects have done little to curb carbon emissions.²² For instance, a recent article published in *Nature Communications* journal found that out of one billion tonnes of credits sold in the voluntary carbon market,

less than 16% represented real emissions reductions, with forest offset projects fairs particularly poorly.²³ Another analysis of 4,000 VCM projects by the rating agency MSCI Carbon Markets found that only 5% represented genuine emissions reductions and positive social and environmental outcomes.²⁴ Amid such concerns, major firms such as Nestlé and EasyJet have abandoned the market,²⁵ while several others have faced lawsuits over their use of offsets to meet green commitments.²⁶

Carbon offsetting has thus been criticised for perpetuating an extractive economic system that prioritises profit over environmental and human welfare, particularly in vulnerable regions. The steady rise in global carbon emissions from deforestation and land-use change since the Kyoto Protocol sadly supports this claim.²⁷ The criticisms of voluntary forest carbon market projects are well known, but include:

Diverting attention from real climate action: They allow big polluters and industrialised economies to continue with ‘business as usual’.

False equivalence: They rest on a false equivalence between the presumed temporary avoidance of emissions from activities like REDD+ and the known permanent fossil fuel-related greenhouse gas emissions.

20 See [Corporations invested in carbon offsets that were ‘likely junk’, analysis says](#), The Guardian, 2024.

21 See [A guide to rating forestry projects in the Voluntary Carbon Market](#), BeZero Carbon, 2023.

22 See [Revealed: top carbon offset projects may not cut planet-heating emissions](#), The Guardian, 2022.

23 Probst, B.S., Toetzke, M., Kontoleon, A. et al. Systematic assessment of the achieved emission reductions of carbon crediting projects. *Nat Commun* 15, 9562 (2024). <https://doi.org/10.1038/s41467-024-53645-z>

24 See [State of Integrity in the Global Carbon-Credit Market](#), MSCI, 2024.

25 See [EasyJet to stop offsetting CO₂ emissions from December](#), The Guardian, 2022.

26 [Greenwashing Exposed: A Close Look at the Existing Case Law \(Part 1\)](#), Oxford Business Law Blog, 2023.

27 [Annual carbon dioxide emissions worldwide since 1940 until 2024](#), Statista, 2025 and [Global Forest Watch](#).

Reducing forests to carbon values: They commodify forests and overlook the multitude of social, cultural, economic and ecological functions they provide.²⁸

Inherent carbon accounting issues: These include perverse incentives to inflate deforestation baselines, difficulty in demonstrating the additionality of projects, ensuring the permanence of ‘avoided carbon emissions,’ and properly assessing ‘leakage’ (emissions shifting elsewhere). There is also a heavy reliance on counterfactuals, which cannot be disproved once the project has started.

Price volatility: The market experiences huge price fluctuations, with an oversupply of credits and increasing concerns over their quality leading to a price crash in recent years. The low price of carbon means that communities are even less likely to benefit once companies and intermediaries take their cut.

Conflicts of interest: Carbon project developers select and pay for the services of independent verification/validation bodies, who often charge a commission on the credits they certify, leading to potential conflicts of interest.

Social impacts: These projects can lead to land grabbing, food insecurity and human rights abuses, especially in countries where collective land tenure is not sufficiently protected.

In recent years, there have been several attempts by private and intergovernmental bodies to address such concerns by developing standards for ‘high integrity’ schemes, such as the industry-dominated Integrity Council for the Voluntary Carbon Market’s (ICVCM) Core Carbon Principles Assessment Framework.²⁹ Yet concerns persist. An RFUK analysis of the leading REDD+ and offsetting protection and jurisdictional-level schemes, including Verra and the Forest Carbon Partnership Facility (FCPF), called into question their environmental and social credentials.³⁰

BOX 1 – TWO CARBON MARKETS

Voluntary carbon markets (VCMs) emerged in the early 2000s, driven by the private sector in response to criticisms of the Kyoto Protocol’s Clean Development Mechanism (CDM) and demand for flexible, market-driven approaches. The 2015 Paris Agreement introduced a UN framework for international carbon trading under Article 6, which includes market mechanisms (Articles 6.2 and 6.4) and non-market approaches (Article 6.8). Article 6.2 enables bilateral agreements to trade “Internationally Transferred Mitigation Outcomes” (ITMOs), while Article 6.4 establishes a centralised mechanism for crediting emission reductions and removals under UN oversight.

COP29 in Baku (November 2024) resulted in an agreement on methodological requirements for Article 6.4, including rules for removals.³¹ Despite safeguards like downward adjustments to crediting baselines, there remain unresolved issues around removals and permanence, potentially allowing low-integrity credits.³² While VCMs are firmly established, the influence of Article 6.4 standards on the voluntary space is uncertain. However, given credibility concerns about many VCM projects, some standards and developers may seek alignment or authorisation under Article 6.4, potentially enhancing system integrity.

28 [Trade in Ecosystem Services](#), World Rainforest Movement.

29 Assessment Framework, [The Integrity Council for the Voluntary Carbon Market](#)

30 [Credits where they are not due: a critical analysis of the major REDD+ schemes](#), Rainforest Foundation UK, 2023.

31 In contrast to avoided deforestation, carbon removals in forest carbon markets involve projects that physically remove carbon dioxide from the atmosphere, like afforestation and reforestation, and store it long-term in forests and soils.

32 See [COP29: Complex Article 6 rules pave way to unruly carbon markets](#), Carbon Market Watch, 2024.

BOX 2 – BIODIVERSITY CREDITS: NEW FRONTIER OR NEW FACADE?

In recent years, nature markets have emerged as a purported solution to stopping and reversing nature loss, particularly in biodiverse-rich countries such as the DRC. According to the Biodiversity Credit Alliance, a biodiversity credit is *“a certificate that represents a measured and evidence-based unit of positive biodiversity outcome that is durable and additional to what would have otherwise occurred.”*³³ Biodiversity gains can be achieved through activities such as ecological restoration, avoided loss or the implementation of conservation management plans. Biodiversity offsets, achieved through the exchange of credits, are often described as voluntary, private-sector investments in nature conservation.

However, the development of open voluntary markets for biodiversity credits faces fundamental challenges. Unlike carbon, which in theory has a clearly defined unit of trade – a metric tonne of carbon dioxide – biodiversity lacks a single, standardised unit and cannot be easily measured. The ‘asset’ being traded is inherently diverse, as ecosystems can vary significantly in their composition, structure and dynamics over short distances and periods. Establishing any form of ‘equivalence’ between an ecosystem that is lost or destroyed and one that is protected or created elsewhere is extremely difficult.

Additionally, biodiversity offsetting suffers from many of the same problems as carbon offsetting, including issues with establishing additionality, the risk of over-crediting, skewed baselines, leakage and non-permanence.

BOX 3 – JURISDICTIONAL PROGRAMMES IN THE DRC

Jurisdictional approaches to REDD+ (J-REDD) aim to address the limitations of project-based models by ensuring comprehensive, large-scale forest governance. Unlike standalone projects, J-REDD operates at the level of an entire administrative unit – such as a province, state or country – integrating REDD+ activities and ‘nested’ carbon projects into broader land-use policies and governance frameworks.

Proponents argue this approach aligns climate, conservation and development goals across a larger geographical scale, ensuring consistency in benefit-sharing, policy implementation and carbon accounting, addressing issues such as leakage and over-crediting that affect voluntary offset projects. J-REDD is often seen as more credible because it is tied to official policies and set on a national or regional scale.

However, jurisdictional approaches can be subject to drawbacks of their own. For example, deforestation baselines can vary widely over such large geographies, leading to flawed policy prescriptions. Policies can also change with shifts in government or public opinion, and a centralisation of power may lead to state capture of community resources.³⁴

33 See [Definition of a Biodiversity Credit Issue, Paper No. 3](#), Biodiversity Credits Alliance, 2024.

34 See [Credits where they are not due: a critical analysis of the major REDD+ schemes](#), Rainforest Foundation UK, 2023.

2.2 CARBON MARKETS IN THE DRC: THE OFFSET ELDORADO

2.2.1 A short history of REDD+ in the DRC

The DRC has been involved in the REDD+ process since 2008, adopting several legislative and policy instruments, including the National REDD+ Strategy in 2012 and the creation of a REDD National Fund and the REDD+ Investment Plan in 2015. While there have been some legal and policy reforms since, the development of the national framework for REDD+ and carbon markets has been piecemeal, and gaps in coordination and implementation persist.

An analysis by CIFOR found that many promises associated with REDD+ have remained unfulfilled, with issues such as unmaterialised funding, lack of inclusiveness in decision-making, limited national data on forest degradation and weak capacity for monitoring, reporting and verification (MRV) of emissions reductions.³⁵ The World Bank's REDD+ Readiness programme has seen limited success, and REDD+ is still largely perceived as an international initiative.³⁶

Despite these challenges, REDD+ and carbon offsetting remain central to the DRC government's policy. Forest-related emissions through REDD+ constitute the largest component of its Nationally Determined Contribution (NDC) under the Paris Agreement, representing a supposed 35 to 40% of the total emissions reduction potential by 2030.³⁷ Reflecting a broader push for carbon markets in Africa,³⁸ President Félix Tshisekedi has called for a minimum price for carbon credits among Congo Basin countries, while Environment Minister Eve Bazaiba urged for international investments in the country's emerging carbon market.

This has led to a wave of carbon deals in the DRC covering vast areas. For example, a deal signed in August 2024 between the Congolese Environment Agency (ACE) and Blue Grace Energy Bolivia³⁹ covers 80 million hectares of non-geographically specified forests, an area roughly the size of Scandinavia. Another company, Kanaka Management Services Limited (KMS), secured rights to a further

70 million hectares (see case study 3.2.4). These two deals alone would cover the entire tropical forest estate of the DRC.

The recent establishment of a Carbon Credits Investment Bank, intended to invest and trade in credits derived from Congolese forests, risks fuelling such large-scale land speculation and dispossession of local communities in the absence of sufficient safeguards.⁴⁰

2.2.2 The legal and regulatory framework of carbon markets in the DRC and its challenges

Overall framework

The DRC must ensure that activities under the REDD+ mechanism align with international agreements, particularly the 2015 Paris Agreement. Projects aimed at enhancing carbon stocks linked to REDD+ must receive state approval. The legal framework for the DRC's NDC was established through Ordinance-law no. 23/007, adopted on March 3, 2023, which amends existing environmental protection legislation and incorporates the carbon market issue, including through the creation of the Carbon Market Regulatory Authority (ARMCA) (Article 17 bis).

The central legal instrument regulating the carbon market in the DRC is Ministerial Order 047 of 2018, which governs the homologation of REDD+ projects. Key requirements include:

- **Registration:** Projects must be listed in the national registry managed by the National REDD Coordination (CN REDD).
- **Approval Conditions:** Projects must comply with procedures set forth in Annex I, including technical and socio-economic studies, obtaining Free, Prior and Informed Consent (FPIC) of affected communities, adherence to an international voluntary carbon market (VCM) standard and proof of the proponent's capacity.

35 [A decade of REDD+ in a changing political environment in the Democratic Republic of Congo](#), CIFOR, 2020.

36 [REDD-MINUS: The Rhetoric and Reality of the Mai Ndombe REDD+ Programme](#), Rainforest Foundation UK and APEM, 2020.

37 [Contribution Déterminée à l'échelle Nationale révisée](#), République démocratique du Congo, Vice-Présidence Ministère de l'Environnement et Développement Durable, 2021.

38 See [African countries scramble for carbon credit eldorado](#), Africa Intelligence, 2025.

39 The company has been accused of falsely claiming UN endorsement to push Indigenous communities in Brazil into carbon ventures. See [False claims of U.N. backing see Indigenous groups cede forest rights for sketchy finance](#), Mongabay, 2024.

40 As above. See [False claims of U.N. backing see Indigenous groups cede forest rights for sketchy finance](#), Mongabay, 2024.

Institutional overlaps and procedural transparency

The implementation of the DRC's regulatory framework has drawn criticism for a lack of inclusivity, transparency and consistency. In 2023, Ministerial Order 23/22 created ARMCA, granting it authority over the national carbon registry and other responsibilities currently managed by CN REDD. However, ARMCA is not yet operational, leading to institutional overlaps and unclear mandates. Furthermore, key environmental regulatory texts, including Ministerial Order 23/22 and the amendment to the 2011 environmental protection law (Law No. 11/009) through Ordinance Law no. 23/007, have been pushed through without due parliamentary process or proper consultation with civil society, Indigenous Peoples or local communities.

Formal benefit-sharing mechanisms

The DRC has made some recent progress through reforms like the 2023 Ordinance-Law promoting greater participation of IP&LCs in carbon credit production and sale through ARMCA and the 2022 Indigenous Pygmy Law which recognises the right of Indigenous Peoples to benefit from ecosystem services in their territories.⁴¹ However, transparency, equity and community involvement issues persist. While Ministerial Order 047 requires REDD+ project developers to negotiate a benefit-sharing agreement with stakeholders, it offers no guidance on assessing or enforcing these agreements, leaving communities highly vulnerable in negotiations with carbon project developers.⁴² This issue is further compounded by Interministerial Order 006/120 of September 2023 on the repartition of State quotas from carbon revenues, which does not specify a minimum share for IP&LCs.⁴³ This has raised widespread complaints in Congolese civil society for preventing socio-economic development for affected communities and recreating the negative patterns observed in the extractive industries.

Community carbon rights

Community carbon rights are not formally recognised in the DRC legislation. According to the Land law, the state owns the forests and their carbon stocks. However, it is also argued that carbon rights resulting

from a REDD+ investment belong to all those investing in the project, such as project proponents and communities themselves.⁴⁴ This creates confusion and insecurity, which can only be addressed by recognising the inherent connection between land and carbon rights and integrating this aspect into future land tenure and related reform processes.

Free, Prior and Informed Consent (FPIC)

Under international law, Free, Prior and Informed Consent (FPIC) is a collective right of Indigenous Peoples to give or withhold consent to any project affecting the lands and resources they traditionally own, occupy or use. The Cancun Agreements establish FPIC as a non-negotiable safeguard for all forest communities, making it a fundamental requirement for access to carbon markets. FPIC is crucial in the context of REDD+ in the DRC as reducing emissions from deforestation may require changes in customary land use, potentially threatening the rights and livelihoods of IP&LCs. It is integrated into the national framework in the following ways:

- **Ministerial Order 047/2018:** Article 12 requires the holder of a REDD+ investment to develop a plan to obtain FPIC as part of the necessary requirements for validation of the REDD+ project, whilst Article 25 requires the project developer to comply with existing national legislation with regards to FPIC.
- **Ministerial Decree 026/2017:** This decree established a national framework for obtaining FPIC in REDD+ projects. The holder of any REDD+ investment is legally required to follow these FPIC guidelines.
- **Safeguard Information System (SIS):** Validated in April 2022, the SIS provides a mechanism for monitoring and reporting on REDD+ safeguards. The DRC submitted its first Summary of Information on REDD+ Safeguards to the UNFCCC in May 2022.

Additionally, the Law on Indigenous Pygmy Peoples and several sectoral policies – particularly in land-use planning – explicitly recognise the obligation to obtain FPIC from IP&LCs before implementing projects on their customary lands. However, the recent Ordinance-Law 23/007, which amended the Law on the Protection

41 See [REDD+ benefit sharing mechanisms in the Democratic Republic of the Congo Legal and institutional frameworks, policy implementation, and project experiences](#), CIFOR and World Agroforestry, 2024.

42 See above, [REDD+ benefit sharing mechanisms in the Democratic Republic of the Congo Legal and institutional frameworks, policy implementation, and project experiences](#), CIFOR and World Agroforestry, 2024.

43 The current breakdown of carbon revenues is 50% for the Public Treasury, 15% for Provincial Government, 10% for the Territorial Administration (EDT), and 25% for the National Environment Fund (including FONAREDD).

44 See [Examining Support for the rights of Indigenous Peoples and local communities in the context of REDD+ in the Democratic Republic of Congo](#), CIFOR and World Agroforestry, 2022.



of the Environment, does not refer to FPIC or other social safeguards, such as benefit-sharing mechanisms and grievance mechanisms. This omission likely stems from the non-participatory nature of the legislative drafting process, which failed to involve IP&LCs and civil society stakeholders. Consequently, the legal framework risks undermining rather than protecting community rights in the carbon market.

2.2.3 Conversion of logging concessions: a revolving door to keep exploiting forests

Faced with widespread illegalities in the forestry sector, the DRC introduced in 2002 a national moratorium on new industrial logging concessions which covers any exchange, relocation or rehabilitation of old titles. This was reinforced by a Presidential Decree in 2005, which specified the conditions for converting forest titles into forest concession contracts, as well as the technical criteria required to lift the moratorium.⁴⁵

The combination of this concession allocation ban, challenging market conditions and the depletion of high-value timber species from logged forests has prompted many logging firms in the DRC to convert their logging titles into conservation concessions aimed at generating carbon offsets. Of the 71 carbon projects we documented, at least 36 fall under this category, including converted and newly attributed concessions.

However, this trend is occurring without a robust legal framework. Current regulations, such as Ministerial Order No. 84 of October 2016, address industrial timber exploitation, while Ministerial Order No. 011/27 specifies rules for allocating conservation forest concessions. Yet, there are a lack of clear laws or provisions to regulate the conversion of industrial logging concessions to conservation concessions.

This legal gap has fostered an environment that lacks clear oversight and compliance. Without clear requirements, companies can continue to maintain

control over large expanses of land without any competitive process, assessment of their capacity or review of their social clauses with impacted communities. According to the legal review of forestry titles carried out by the Ministry of Environment (MEDD) in February 2023, out of 26 conservation concessions assessed, 17 belonged to former timber companies whose contracts have been either cancelled or have received a formal notice to regularise their situation.⁴⁶

This is the case of the timber company Norsudtimber which in 2020 transferred its logging concessions to its subsidiary, Kongo Forest Based Solutions (KFBS), established to pursue carbon credit initiatives. This conversion, spanning over 2.5 million hectares – an area roughly the size of Belgium – reportedly contravened multiple legal regulations.⁴⁷ A MEDD legal review of forest concessions in February 2023 led to the company receiving a formal notice.⁴⁸

Similarly, in Tshopo province, the Blattner-owned logging firm Société Africaine de Bois (SAFBOIS) converted 348,000 hectares of its logging concessions in the Isangi territory into a REDD+ project in partnership with Jadora, an American sustainable land and resource management company. Since its inception in 2009, the Jadora-SAFBOIS ISANGI REDD+ project sold approximately 1.3 million carbon credits to international buyers until it was removed from Verra's registry in 2023, after its contract was terminated by MEDD following the legal review.⁴⁹

In sum, it appears that when industrial logging became commercially unviable, SAFBOIS converted its concession into a carbon project to continue profiting without substantial on-the-ground efforts. When illegalities surrounding SAFBOIS resurfaced, they abandoned the project and shifted their focus to the conservation business in Opala territory, Tshopo province (see case study 3.2.1).

45 Decree No. 05/116, October 2005, 'Establishing the procedures for converting former forest titles into forest concession contracts and extending the moratorium on the granting of forest exploitation titles'.

46 Ministry of Environment, [Legal review of forestry title, Final Report](#), January 2024.

47 See above, Ministry of Environment, [Legal review of forestry title, Final Report](#), January 2024.

48 It is unclear whether the company provided the necessary information to continue its activities.

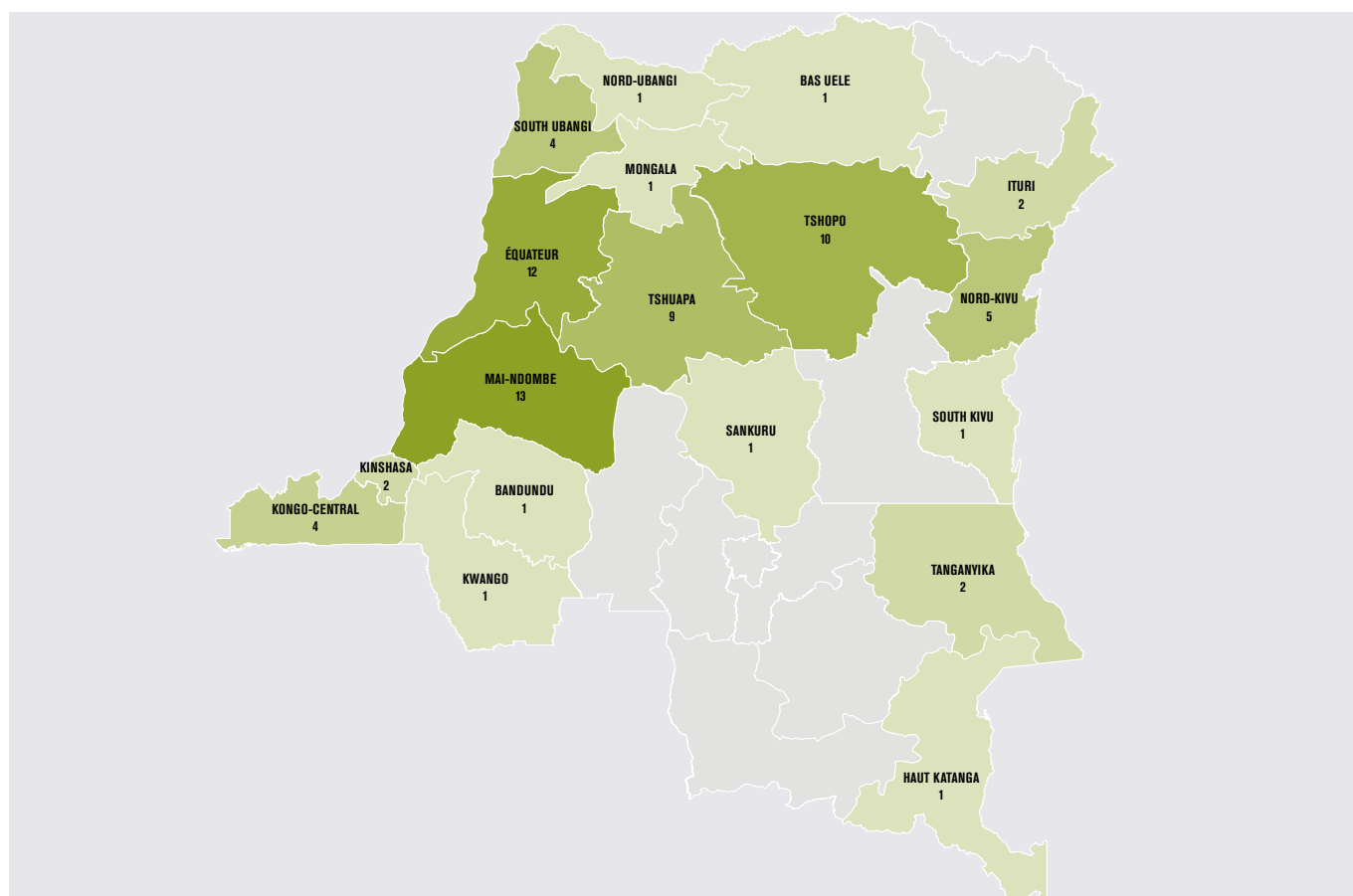
49 See [General Carbon Credits in the Congo: The Cost of Capture, Part 1](#), Africa Uncensored, 2025.

3. CASE STUDIES: CARBON MARKET PROJECTS IN THE DRC

3.1 OVERVIEW OF FOREST CARBON PROJECTS

This research has attempted to map carbon forest projects in the DRC using official documents, fieldwork and information from various sources, including civil society organisations, local communities, authorities, researchers and carbon project developers themselves. Our findings reveal a significant discrepancy between the documented initiatives and those officially registered at the national level. As of April 2025, we identified 71 carbon projects and conservation concessions covering approximately 103 million hectares, though the status of most remains unverified due to a lack of information. According to CN REDD, there are currently only 15 projects in the national registry, comprising private, jurisdictional and community-led initiatives. Despite multiple requests, we were unable to access the registry to verify which projects have been validated. This leaves more than 50 projects that have either never undergone any homologation process or for which the process is either incomplete or undocumented.

FIGURE 3: LOCATION OF CARBON PROJECTS IDENTIFIED IN THE DRC



3.2 PRESENTATION OF CASE STUDIES

In order to capture the breadth of the research into carbon projects in the DRC and the depth of the socio-economic and legal challenges they pose, the case studies below have been selected based on several criteria: 1) accessibility and availability of first-hand information and testimonies; 2) certification by Verra or other standards; 3) documented presence of overlapping land tenure systems; 4) size of the project; and 5) profile of the project developer.

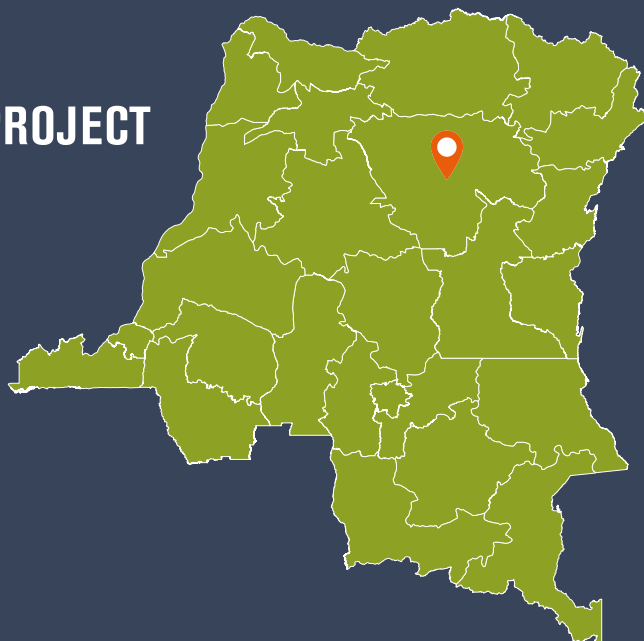


3.2.1 CASE STUDY:

TSHOPO LOMAMI GROUPED REDD+ PROJECT

KEY FACTS AND ISSUES

- Composed of 3 concessions covering over 930,000 hectares, exceeding the 500,000-hectare limit.
- Formal notice for one of the concessions (RESO) from MEDD due to irregularities in the conversion process.
- ‘Under validation’ by Verra.
- Issues: irregularities in the attribution of the concession, lack of respect for FPIC, exacerbation of social conflicts, rights abuses.



OVERVIEW – THE MAKING OF A CARBON DYNASTY

In the lush forests of the Opala territory in Tshopo province, a consortium of four companies – Future Carbon Holding SA, Green Initiatives LTD (GRIN), Biodiversity Development LTD (BIODEV) and Renewable Solutions LTD (RESO) – initiated a REDD+ project aimed at avoiding deforestation through the creation of the Lomami Conservation Corridor. Officially called the Tshopo Lomami Grouped REDD+ Project, it is widely known to the local population simply as ‘GRIN BIODEV’. The Verra registry currently shows the project as ‘under validation’.⁵⁰

The project aims to reduce over 88 million tCO₂e emissions over its 30-year span, with an annual average of 2.9 million. It also purports to contribute to several Sustainable Development Goals (SDGs) by implementing educational programmes, improving agricultural practices to boost productivity, enhancing access to water sources, hiring local workers and promoting better health and sanitation practices.⁵¹ Although the project documentation does not explicitly mention the number of communities impacted, exchanges with local civil society members indicate

it concerns seven territorial entities (chiefdoms and sectors) of the Mbole community in Opala territory: Mongo, Balinga Lindja, Kembe, Yeyango, Yapandu, Yalingo and Yawende Loolo.

A closer examination of the documents submitted to Verra suggests that three of the four entities involved – GRIN, BIODEV, and RESO – are owned by the same individual, Blandon Blattner. He is listed as the contact person for all three entities in the project documentation, and all are registered at the same address in Florida.⁵² In response to our findings, a company representative stated that these companies are held by multiple shareholders, though no further details about the ownership structure were provided. Blattner is a member of a well-known American family that has built a business empire in the DRC, reportedly managing several million hectares of forests through timber companies such as SAFOBOIS (later converted into conservation concessions) and SIFORCO.⁵³

Although there are some inconsistencies with the figures presented in the latest project description

50 According to the Tshopo Lomami Grouped REDD+ Project – Document project. However, the methodology for this was updated in December 2023 and is being phased out in favour of VM0048 as part of Verra’s drive to consolidate its REDD+ rules. According to Verra’s guidelines, projects using VM0015 must complete validation by March 19 2025. If not finalised by that date, the project will be required to re-submit under VM0048, a shift that could significantly affect its timeline and eligibility. As of now, the project remains listed as “under validation” on the Verra registry, with no publicly available information indicating a transition to the new methodology. Blattner responded to RFUK’s request for clarification in writing on 2 July 2025, confirming that the project did not receive validation from Verra prior to the 19 March deadline. A company representative further stated that any future updates to the methodology will align with Verra’s evolving requirements. Additionally, they clarified that the documents currently available online are draft versions and do not reflect the most recent or complete information regarding the project.

51 See [Verra registry: Tshopo Lomami Grouped REDD Project](#)

52 See above.

53 See [Exporting Impunity](#), Global Witness, 2015.

document from October 2022, the three companies collectively occupy a surface area of over 930,000 hectares, which appears to be a violation of Article 92 of the Forestry Code. In reply to RFUK, the company representative confirmed that the project area presented in the document corresponds to preliminary documentation, and the current figures and boundaries presented should not be considered final.⁵⁴ Renewable Solutions – was placed under a formal notice (warning) from MEDD in January 2024 following a legal review and given three months to resolve its situation.

The final member of the project consortium, according to the draft project description document on the Verra register, is Africa Climate Investments LLC. The company lists an address in Miami, although we were not able to find any record of this in the Florida State corporate register.⁵⁵ It also appears to be involved in the Bonobo Conservation Initiative's 'Kokolopori Bonobo Peace Forest Grouped REDD Project', another forest carbon project currently under development with Verra.⁵⁶

LACK OF FREE, PRIOR AND INFORMED CONSENT

The project document states a commitment to conducting a comprehensive Free, Prior and Informed Consent (FPIC) process with local communities to understand their needs and aspirations. However, it does not provide a clear or detailed explanation of how this process should be carried out in practice.⁵⁷

While project representatives have assured RFUK via email that the FPIC process was conducted in accordance with the relevant legal and regulatory frameworks in the DRC, reports from local residents and grassroots organisations suggest otherwise. These accounts indicate that FPIC procedures were not adequately followed, raising concerns about the legitimacy and inclusiveness of the consultation process.

Although the project cites September 2020 as its official start date, community members reported that the first engagement only occurred in November 2022, during an awareness-raising session on carbon markets. The FPIC process, as outlined in the National Guidelines, was rushed. There was insufficient sensitisation and information sharing. Crucially, no

participatory mapping was conducted to identify customary land rights and uses. Consultations were partial and inconsistent, often involving payments to customary authorities, while the broader community was largely excluded from meaningful decision-making.

One of the community members hired by GRIN BLODEV to support project implementation confirmed to the research team that “*things were not done in due form*” and that in most villages, signatures for the *cahier des charges*⁵⁸ were obtained from local elites in exchange for sums of money or other benefits. Community members and local civil society organisations (CSOs) interviewed put the figure at 250,000 to 300,000 CF (90 to 100 USD). Similar concerns were raised concerning the lack of a procedure for selecting local project workers. This malpractice soon attracted villagers’ attention, leading to widespread complaints and fears among the population.

“If you want to do something for me, and without me, then – it is not for me. The cahier des charges should have been done together with the community, not in a hidden corner.”

– Community informant

HUMAN RIGHTS CONCERNS

Poor consultation and communication by GRIN BLODEV agents soon led to conflict between residents and the project. The imposition of the *cahier des charges* agreement and top-down approach prompted communities to organise a peaceful protest from 31 January to 2 February 2023, coinciding with the official signing ceremony.

Video footage obtained clearly shows how this protest was brutally suppressed by security forces, including the Congolese army (FARDC) and police (PNC), using gunshots and physical assaults to disperse protesters. The crackdown resulted in the arbitrary arrest and detention of seven people, including a woman, who

54 Email correspondence between RFUK and the Tshopo Lomami Grouped Redd+ project dated 2 July 2025.

55 [The Florida State Corporate Register](#)

56 See [Verra registry](#).

57 See [Tshopo Lomami Grouped REDD+ Project document description](#)

58 *Cahier des charges* is a common term in DRC used to indicate the ‘social development plan’ that a private concession holder or any company holding an exploitation permit (logging, conservation or mining) commits to undertake for the communities living within the concession. Normally it includes specific projects and initiatives, such as infrastructure development, agricultural support, job creation and training programmes, which should be tailored to the specific needs and priorities of the communities.

were eventually released more than 48 hours later thanks to the efforts of local civil society representatives.

In Kisangani, we spoke with two of the victims: *“We spent more than 48 hours in solitary confinement, undergoing cruel treatment; we were repeatedly beaten, and our personal belongings were extorted by force. My telephone and electoral card were taken from me during captivity,”* said one of them. A declaration issued by CSOs in February 2023, addressed to the Provincial Governor, strongly condemned the abuses committed by security forces in the name of GRIN BIODEV⁵⁹ and called for the government to punish the perpetrators and support the communities in negotiating with the company.

In response to RFUK, the company representative claimed that the February 2023 protest was unrelated to the Tshopo Lomami Grouped REDD+ project and occurred in a different area. He stated that after three days of peaceful demonstrations, all parties signed the cahier des charges. However, evidence gathered by RFUK and APEM clearly shows that the protests targeted GRIN and BIODEV.

To date, no follow-up has occurred, likely due to the absence of company representatives in the area. Although a GRIN BIODEV agent confirmed that staff were assigned to address community concerns, inhabitants seemed to be unaware of any grievance and redress mechanism.

LACK OF BENEFITS, EMPLOYMENT AND ECONOMIC OPPORTUNITIES

As of today, the GRIN BIODEV project has not carried out any activities in the area, and none of the commitments set out in the *cahier de charges* (Article 9), including the construction of three primary schools and three health posts, have been fulfilled. As one of the local chiefs stated in August 2024, *“not even a stone has been placed.”*

Additionally, no monetary benefits repartition was included in writing in the contract. However, some local authorities reported that during the *cahier des charges* ceremony, the company verbally promised that the sale of carbon credits would be divided as follows: 50% for the government, 37.5% for the project developer and 12.5% for the community. The company representative denied this claim, saying in his reply that talking about a ‘benefit sharing agreement would be premature at this stage’. We are not aware of any credits sold by the GRIN BIODEV project, nor of any monetary benefits distributed to the communities, perhaps because the project has yet to be validated.



59 [Indignation profonde de la jeunesse d'OPALA par REDD+](#)

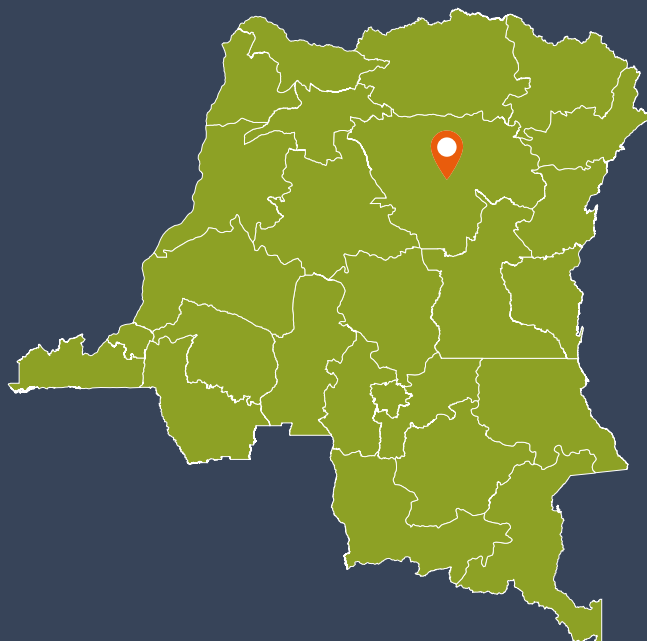


3.3.2 CASE STUDY:

SOCIÉTÉ DE CONSERVATION ET DÉVELOPPEMENT (SOCODEV)

KEY FACTS AND ISSUES

- Newly formed conservation concession.
- Exceeding the 500,000-hectare size limit.
- Homologation pending but not yet certified by an international body.
- Issues: lack of community FPIC and consultations; illegal attribution of the concession; disruption of CFCL process.



OVERVIEW – FROM THE JET-SET TO CONSERVATION

In July 2023, Société de Conservation et Développement (SOCODEV) obtained a concession in Banalia, Baboro and Bamanga sectors in Tshopo province.⁶⁰ Little information is publicly available about SOCODEV or its track record in the conservation industry, and the company does not even seem to have a website. Its owners appear to be two French nationals: a music video producer, who is also CEO of RMC Mining, a small mining company operating in Lualaba province, and a former professional footballer, with a third Congolese representative owning 20% of the company shares.

Illegality in the awards of the concessions

Despite the questionable profile of SOCODEV and its associates, the company appears to have received preferential treatment from MEDD. The two concessions were awarded without the company being required to pay the bank guarantee and were allocated without any prior public enquiry involving the affected parties as mandated by the 2011 Ministerial Decree. They also cover a total area of over 517,000 hectares, exceeding the limit established by Article 92 of the Forest Code.

Communities left in the dark

In the four communities visited by researchers in the Banalia sector within the SOCODEV concession, residents shared a familiar story: only one awareness-raising meeting was held to discuss the advantages of carbon markets. This was followed by a brief canvassing of community priorities and needs to form the basis of the *cahier des charges*. Residents noted, however, that the information provided by SOCODEV representatives about how the carbon market works and what they could expect from the project was very vague. Documents provided were only in French, and the meetings were rushed, leaving insufficient time for them to fully understand the project and its implications. Many believed it was merely an 'attendance list' rather than a set of specifications and the company did not leave a copy with the community, preventing residents from seeking technical or legal support.⁶¹

In a focus group discussion with female residents of the villages, they lamented that they had never been involved in any discussions or meetings regarding the project, nor did they know what 'carbon offsetting' was or what it had to do with their land.

⁶⁰ See [Journal Officiel de la RDC](#), no. 19, October 2023.

⁶¹ One SOCODEV representative in Kisangani explained to RFUK and APEM that the reason the *cahier des charges* agreement had not been left with the communities was because none of the agents deployed during the sensitisation mission had the necessary authorisation to sign on behalf of the company.

Absence of income, employment and economic opportunities

More than one year after the signature of the *cahier des charges*, little appears to have been done in the villages within the concessions in terms of socio-economic or livelihood activities. In some cases, small amounts of money and other in-kind gifts such as TV satellite kits and footballs were donated to village chiefs and a few other community members. However, these were not the requests made by the local inhabitants themselves. The director of the primary school in the village of Libombo reported that even the company's promise to 'mechanise the schools' (an expression meaning paying transport fees for teachers, given the logistical challenges for them to reach the schools) had yet to materialise.

"The first time SOCODEV came here, we knew nothing about it; we'd never heard of the carbon market before. They talked to us about the advantages of carbon markets, but we still don't understand what it's all about. We signed the *cahier des charges* without really understanding because they gave us a small amount, more or less 100,000 Congolese Francs (roughly 35 USD) as a meal for the whole village. After that, nothing has been done. We are tired of this; we don't want this project any more in our land."

– Inhabitant of Bomgumbulu village

Social tensions

The presence of SOCODEV risks exacerbating tensions between neighbouring communities, as some refused to sign the *cahier des charges* due to concerns over the company's approach.

"The forest is our heritage and our life. SOCODEV are not development actors. They are interested in the authorities, not the communities. We won't accept this type of project in our forest."

- Member of the Bonjala community

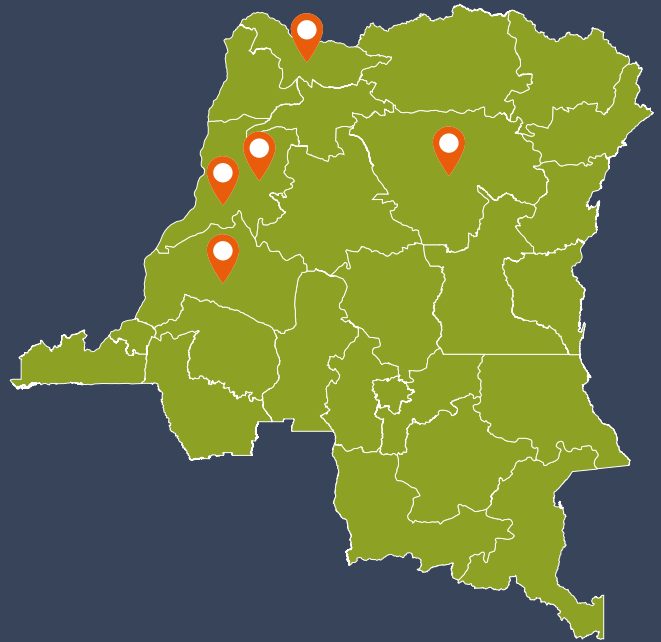
It remains uncertain what will happen to the communities that have not signed the *cahier des charges* agreement, given that the award of the concession subjects them to a contract they did not accept and prevents them from doing certain activities and pursuing other processes, such as establishing a community forest concession. There was no evidence of a complaints mechanism established by the company to address such situations, nor did the inhabitants seem aware of any existing channels or contacts for raising their concerns.

3.2.3 CASE STUDY:

WILDLIFE WORKS CARBON (WWC)

KEY FACTS AND ISSUES

- 5 concessions belonging to WWC and its subsidiaries.
- Concessions exceeding 500,000-hectare limit.
- Contract signed before the creation of the company.
- Issues: irregularities in concession allocation, lack of FPIC, mixed benefits from carbon revenues.



OVERVIEW – A CARBON EMPIRE

Wildlife Works Carbon (WWC) is a San Francisco-based conservation company specialising in the sale of carbon credits for wildlife protection, with projects active in Colombia, Kenya and the DRC, and under development in Brazil. In March 2012, WWC entered a joint venture with the Canadian firm Ecosystem Restoration Associate (ERA)⁶² for the carbon rights to two former logging concessions in Mai Ndombe province, becoming the sole shareholder in 2013 after acquiring ERA's shares.

WWC is one of the few companies, along with Jadora/Safbois and Co2 Logic, to have sold credits in the international voluntary markets for a DRC project. According to its website, WWC develops forest conservation projects in partnership with communities who are safeguarding the most biodiverse ecosystems on Earth and uses economic solutions to lift forest communities towards their development goals.⁶³

WWC/ERA Congo is often viewed as a carbon pioneer in the DRC with its Mai Ndombe REDD+ project

having sold more than 20 million tonnes of credits.⁶⁴ In this vein, in March 2023, MEDD awarded Congolese subsidiaries of the company⁶⁵ four conservation concessions, including one in Minister Bazaiba's electoral district of Basoko in Tshopo province, two in Equateur province (Basankusu and Bikoro territories) and one in North Ubangi province. According to information and maps obtained from local sources, two additional concessions have reportedly been awarded to WWC in South Ubangi province⁶⁶ although the company denies this claim.

Irregularities in the awards of the new WWC concessions

In recent months, this acquisition of large swaths of Congolese forests has led to controversy.⁶⁷ Based on official information, the four concessions were awarded to two of WWC's Congolese entities, WWC Congo and the Société de Restauration Forestière et Aménagement (SORFA), totalling over 800,000-hectares.⁶⁸ Together with the 300,000-hectare project in Mai Ndombe province, the company and

62 WWC is still largely referred to in DRC as ERA, the name of the company it acquired over a decade ago.

63 See [Wildlife Works](#).

64 According to WWC DRC representatives, see Forêt : [Crédits carbone, ERA CONGO a vendu 20 millions de tonnes sur le marché international](#), Environews DRC, 2024. However, the [VERRA registry reports](#) that over 34 million credits have been sold in total through the REDD Mai Ndombe project.

65 Journal Officiel de la RDC, Novembre 2023. However, the contract for the WWC Businga Concession was not published in the Journal.

66 Maps of WWC concessions in [Kungu](#) and [Budjala](#), South Ubangi province.

67 See for instance, [DRC Environment Minister implicated in carbon credit land grab](#), Greenpeace, 2022.

68 There are inconsistencies regarding the exact size and location in the Official Journal, with one of SORFA's concessions being manifestly erroneous. Also see, <https://www.greenpeace.org/africa/en/press/55297/drc-greenpeace-denounces-the-illicit-allocation-of-a-million-hectares-of-forest-to-an-american-company/>, Greenpeace, 2024.

its affiliates' holdings appear to exceed by far the 500,000-hectare limit outlined in Article 92 of the DRC Forest Code.

WWC claims the companies are separate legal entities, each holding under 500,000 hectares with distinct shareholders. However, Article 92 of the DRC Forest Code limits forest concessions to 500,000 hectares per person, including through multiple holdings. This suggests the cap applies to beneficial control, not just legal structure – and WWC appears to be the majority shareholder in all three entities.

Another concern relates to the attribution process. Although the contracts awarding the concessions were signed on 4 March 2023, SORFA, the recipient of one conservation concession in Bikoro Territory (Équateur Province) and another in Basoko Territory (Tshopo Province), was only officially registered on 16 March 2023. This raises questions about the validity of the contracts and the due diligence exercised in allocating 400,000 hectares of land to an entity that was not yet legally established at the time of signing.⁶⁹ WWC has claimed that the discrepancy in dates stems from an error at the level of the *Guichet Unique de Création d'Entreprise* (GUCE), the official body responsible for company registration in the DRC, and that the company had opened the bank account and transferred funds before the contract was signed. However, it did not provide any supporting documentation to substantiate these assertions.

The location of one of these concessions is also noteworthy. In 2022, MEDD issued a mission order authorising a WWC team to 'wrestle' local community consent for the project in Basoko.⁷⁰ However, the concession overlaps with the existing but suspended Tradelink concession, prompting concerns from Greenpeace and others.⁷¹ WWC has responded that the new project was on hold pending the definitive cancellation of the Tradelink concession.⁷²

Community resistance in North Ubangi

In March 2023, WWC was awarded a conservation concession covering nearly 300,000 hectares of intact tropical forest in the remote Businga Territory of North Ubangi Province, home to many forest communities, including the Indigenous Ngbandi people.

In September 2023, a coalition of CSOs, led by the Association pour le Développement du Nord Ubangi (ADENU) and Congo Terre d'Asile Climatique (CATC), along with representatives from five territorial entities, filed an administrative appeal against WWC and MEDD demanding the immediate cancellation of the contract.⁷³ The plaintiffs accused MEDD of awarding the contract in violation of several norms of the DRC forestry legislation. They claimed that MEDD lacked the authority to sign such a contract as forestry legislation falls under provincial jurisdiction and that the company was exempted from paying the required security deposit. They also argued that the contract authorised a private sale without reasonable justification or a public enquiry and was not published in the *Journal Officiel de la République Démocratique du Congo*, the Official Journal of the DRC, as per Congolese law.⁷⁴

The group found no evidence that local communities and Indigenous Peoples were involved in the assessment of WWC's offer despite this being a requirement under the Ministerial Order 011/27 (Article 16). Like other case studies, the company reportedly held only one brief meeting with a few local chiefs, during which benefits were promised and the contract was signed. The communities complained they did not participate in the elaboration of the *cahier des charges* and were not informed about the concession until after the contract was signed.

Similar concerns were raised by the Association Culturelle Mbiya (ACM), which represents the Indigenous Ngbandi people. ACM alerted ADENU and CTAC to WWC's activities, prompting a series of peaceful protests, legal action against the project and the submission of a memorandum to the DRC President calling for the cancellation of the concession contract.

69 Société de Restauration Forestière et Aménagement (SORFA), Statut 2022.

70 See [RDC : La ministre de l'Environnement impliquée dans un projet d'accaparement des terres au profit de crédits carbone](#), Mongabay, 2022.

71 See [Implication d'Eve Bazaiba dans l'affaire Tradelink : le document qui accable la ministre](#), Greenpeace, 2021.

72 Ibid.

73 [Mise en Demeure](#), WWC North Ubangi.

74 [Assignation et annulation d'un contrat de concession forestière](#).

“People were unaware of what WWC had been doing in our land. None of the required steps were respected. They bought their FPIC. But things cannot be done in this way.”

- Association Culturelle Mbiya

One year after the administrative appeal, the coalition has not received any acknowledgement or response from MEDD, and no follow-up action has been taken. However, the judicial process continues, with a hearing expected before the end of 2025. The future of the WWC concession remains uncertain, while discontent grows that no economic or development activities have occurred. The lengthy process of validating and verifying the project and selling credits in the international voluntary market leaves little hope of this changing soon.

Social upheaval in Equateur

In Basankusu territory, Equateur province, WWC's subsidiary ERA Congo obtained a conservation concession of 188,835 hectares in March 2023. However, already prior to the concession award, the communities living in Lifumba, a Groupement within the concession boundaries, addressed a letter to WWC in August 2022 expressing their opposition to the project. They accused the project of creating tensions among communities that had lived in peace for generations by excluding six out of the ten villages from the project.⁷⁵

The letter, signed by over 100 community members, criticised the process as neither inclusive nor participatory, stating that WWC limited its engagement to local chiefs who lacked the legitimacy to represent the entire community. The letter also complained that the company ignored their demand to invest in rehabilitating local roads and imposed its own priorities as part of the *cahier des charges*.

Denial of Community Self-Determination

A field investigation in Equateur in May 2024 found that inhabitants of Lifumba felt coerced into signing the agreement, and that FPIC was not adequately sought or obtained from them. RFUK partners also reiterated that the forest area granted to WWC/ERA interfered with the ongoing process of attributing ten community forests in the sectors of Waka-Bokeka and Lac Ntumba, whose application files had already been submitted to the Provincial Governor's office for approval.⁷⁶

The encroachment of conservation concessions on community forest initiatives denies local communities' rights to self-determination, reducing their capacity and autonomy to make decisions regarding their forests and lands.

WWC'S MAI NDOMBE REDD+ PROJECT – A DECADE ON

In contrast to the wave of new carbon projects in the DRC, WWC has been implementing a REDD+ project in Mai Ndombe province since 2012,⁷⁷ allowing us to assess its impacts over time.⁷⁸ The WWC Mai Ndombe REDD+ project spans over almost 300,000 hectares, with roughly 50,000 people living inside the concession. The Verra-certified project's climate goals focus on reducing Co2 emissions by tackling deforestation, illegal logging, charcoal production and 'slash-and-burn' farming. The project has been praised by government and non-government actors in the DRC as a successful model to be replicated nationwide, alongside a PR campaign by a marketing agency and a subsidiary of WWC, emphasising its environmental and economic benefits.⁷⁹

Mixed benefits

After more than a decade of activity in the DRC, WWC claims to have sold around 20 million tonnes of avoided deforestation credits from the REDD+ Mai Ndombe project to companies including British Airways, Eni, Shell, Nespresso and PetroChina.⁸⁰ Taking an average price of 7 USD per tonne⁸¹ this would equate to approximately 140 USD million in revenues, making the company a leading global supplier of carbon credits.

75 [Memo du Groupement Lifumba](#), August 2022.

76 [Rapport sur l'empiètement des concessions forestière de conservation ERA Congo et SORFA sur les initiatives CFCL a l'Equateur](#).

77 Marine Gauthier, Mai Ndombe: Will the REDD+ Laboratory Benefit Indigenous Peoples and Local Communities? Rights and Resources Initiative, 2018.

78 [REDD-MINUS: The Rhetoric and Reality of the Mai Ndombe REDD+ Programme](#), Rainforest Foundation UK and APEM, 2020.

79 See [Wildlife Works Launches Everland To Accelerate High Impact Forest Conservation Projects That Fight Climate Change](#), Greemoney, 2017.

80 See [Verra registry Issuance record](#).

81 See [Mai-Ndombe : Era Congo a coulé de plus 20 millions de tonnes de crédits carbone sur le marché international](#), Actualité CD, 2024.

According to a WWC country representative, 25% of carbon revenues are allocated to local communities through local development committees (CLDs) for the construction of community infrastructure and support for other development activities.⁸² However, the 2011 *cahier de charges* does not specify community payments as a percentage of profits whilst the Memorandum of Understanding with the DRC government signed in the same year stated that WWC would provide local communities with a minimum of 0.50 USD per net tonne of emissions reductions for the first three years through in-kind contributions, increasing to 1.50 USD per tonne thereafter, subject to independent third-party verification.⁸³

Previous field research by RFUK and APEM from 2020 found that most residents within the project boundaries were unaware of its existence, and only a small fraction of promised benefits had been realised, often in a fragmented manner.⁸⁴ Since then, WWC claims to have made significant progress,⁸⁵ including the creation of 300 local jobs; 30 new or renovated schools with paid teachers; 2 new hospitals; 18 mobile clinics; paid healthcare workers and vaccination programmes; 28 (including 11 solar-powered) wells to provide safe drinking water; and 25 new fishponds and enhanced agriculture techniques to strengthen local food security and reduce pressure on forests; as well as royalties for customary authorities.⁸⁶ A follow-up mission to five communities within the WWC concession in August 2024 allowed for a partial assessment of these claims (not all the villages in the concession could be visited due to logistical and security reasons):⁸⁷



Ntuku Village: a school with six classrooms has been built, the teachers are paid monthly and school supplies are provided. However, the building is still unfinished, lacking concrete flooring, benches, a school management office or even sufficient school latrines. WWC has stated that this delay was because the children had already started to use the building, making it difficult to complete the interior work and that the finishing works will be completed in the coming months, as has been done in other villages such as Lokanga, Mbale, Ikita, Nsongo, Nselenge, Lobeke, Inunu, Mpili and Mbwe Nzey.

One of the eleven solar-powered water wells has been built in the village. At the time of the field mission, the borehole was not working, although WWC confirmed in its reply that it is now functioning properly.

82 See [REDD+Mai-Ndombe : les communautés locales bénéficient 25% de plus 20 millions de tonnes de crédits carbone vendues par Era Congo](#), DeskNature.com, 2024.

83 [Forest Conservation Concession Contract](#).

84 [REDD-MINUS: The Rhetoric and Reality of the Mai Ndombe REDD+ Programme](#), Rainforest Foundation UK and APEM, 2020.

85 See above [REDD+Mai-Ndombe : les communautés locales bénéficient 25% de plus 20 millions de tonnes de crédits carbone vendues par Era Congo](#), DeskNature.com, 2024.

86 See [Mai Ndombe, Democratic Republic of the Congo](#), Wildlife Works.

87 WWC has responded to the findings presented in this research by RFUK. The full response on the REDD+ Mai Ndombe project is available at the end of this report (Annex I).

“They study on the floor if the parent doesn’t have a chair to give them! Another thing is that without a latrine, they cannot study in adequate conditions.”

- A local teacher

Bobolampinga Village: as with Ntuku, the school built by WWC remains incomplete, lacking a management office, latrines and ceilings. The health centre is unequipped, and local care conditions are poor, although WWC reportedly does cover surgery costs.

WWC reportedly enforces strict restrictions on livelihood activities here, leading to fines and arrests for activities such as timber harvesting to build doors or coffins. Community members also reported that access to a part of the forest known locally as Loteke, where WWC has installed some infrastructure, is strictly prohibited.

Loombe village: WWC constructed a school, some fishponds and a modern latrine. However, the latrine is reportedly reserved for WWC visitors, leaving local inhabitants without access. According to the company, the construction of the school latrines is planned and will be completed in the coming months.

Ibali village: the village has a primary school, where teachers receive financial support and school supplies. However, an agreement to build a secondary school has not yet been fulfilled.

A hospital has been built and community members receive free care there, which represents an improvement, even if the building and some of the wards remain unfinished. The research team was, however, prevented from speaking with patients and forced to leave the village.

Reports from other villages: although the research team was unable to visit more communities, we have received several reports of issues from local NGOs operating in the area, notably related to the lack of promised community infrastructure in the communities of Mekiri, Ntumbe, Kutu Moke and Epoko Fonga and non-payment of customary royalties, among other issues.

In its response to RFUK, WWC stated that these initiatives are still ‘works in progress’. In the meantime,

it noted that benefits, such as the construction of schools, have already been carried out in other villages, including Lokanga, Mbale, Ikita, Nsongo, Nselenge, Lobeke, Inunu, Mpili, and Mbwe Nzey, with some supporting evidence provided.

Lack of community consultations, representation and redress

The failure of WWC to obtain the FPIC of local communities has been widely documented in previous reports.⁸⁸ At the project’s inception, agreements were signed by customary representatives without a proper understanding or legitimacy, leading to suspicions about the project’s aims and tensions between communities. We found no evidence of further consent processes with communities by WWC, which seems to rely on the initial documents as proof of compliance.

Residents in all villages visited expressed growing frustrations over the legitimacy of local development committees (CLDs), local governance bodies established through the cahier des charges to act as the community interface with the project.⁸⁹ These are generally perceived as being untransparent, unaccountable and representing the needs of WWC over those of the community.

WWC maintains that CLDs are managed independently from the company, whose involvement is limited to some consultations and technical follow-up, and that it has been informed of recent leadership changes in some CLDs, including those of Lokanga and Lobeke.

“The CLD mandates are long overdue, and no one dares say so because they are at the service of WWC. We cannot go against them. Nobody has control over their actions.”

- A village member

88 See, for example, [REDD-MINUS: The Rhetoric and Reality of the Mai Ndombe REDD+ Programme](#), Rainforest Foundation UK and APEM, 2020.

89 [Cahier de Charges d’un Contract de Concession Forestiere de Conservation, ERA](#).

WWC reported to RFUK that it has implemented a multi-tier grievance mechanism comprising: 1) Local Development Committees (CLDs), responsible for transmitting complaints from villages; 2) an “open phone line,” with direct access to company representatives and NGO partners; and 3) additional channels recognised by the Ministry of Environment. WWC claims that this system has successfully resolved several disputes, including one between the villages of Ilee and Mankaba. However, during the field visit, none of the interviewed residents appeared to be aware of any formal mechanism for raising concerns.

All of this leads to the conclusion that the project has not fostered a sufficiently strong sense of ownership among local residents. Many reported that WWC presents itself as a benevolent organisation coming to help the most vulnerable, but there is insufficient communication about the distribution of profits made by the company and about what they should receive. Only after meetings with the research team did some people understand that these benefits should belong to them and that they should be seen as equal partners in the project.

Questionable climate credentials

The WWC project is one of the very few in the DRC to have generated carbon credits from ‘avoided deforestation activities’ for sale in the international carbon market.⁹⁰ According to its website, the project has reduced Co2 emissions by an average of 3.8 million tonnes annually by protecting 300,000 hectares of forest from deforestation.⁹¹ It is claimed this has been achieved by stopping industrial logging and associated road building, as well as investing in community development activities that reduce pressures on forests from farming and local timber felling.⁹²

The independent rating agency Renoster gave the project a 0.15 score (on a scale of 0 to 1), indicating that for each credit issued only 15% represented real emissions reductions. This is attributed to several factors, including the use of a baseline skewed towards near-total deforestation without significant evidence, flaws in the accounting methodology, underreporting of actual deforestation rates and the lack of deductions for leakages. Additionally, it found little evidence of positive impact on communities living within the project boundaries.⁹³

WWC has rejected Renoster’s assessment, accusing the ratings body of factual inaccuracies, incorrect assumptions and overstatements. Yet other analyses have cast further doubt on the project’s environmental credentials. In April 2023, the independent ratings agency BeZero Carbon reaffirmed its ‘BB’ rating for the project, indicating a moderately low likelihood of achieving one tonne of CO2e avoidance or removal.⁹⁴

Verra should have identified the issues highlighted in this report. However, its business model may present a potential conflict of interest, as it receives financial incentives for issuing credits from the projects it certifies. Receiving 0.10 USD per credit until the new fee schedule was adopted in October 2024, the certification body could have earned up to 3 million USD from the project’s operations.

90 See [Verra registry](#).

91 Ibid.

92 See [Mai Ndombe REDD+ Project FAQs](#), Wildlife Works, 2024.

93 [DocSend](#), Renoster rating.

94 See <https://bezerocarbonmarkets.com/projects/VCS934>

3.2.4 CASE STUDY:

THE SCRAMBLE FOR THE CUVETTE CENTRALE PEATLANDS

KEY FACTS AND ISSUES

- Multiple VCM and conservation concession projects.
- Issues: Lack of adequate consultations & respect for FPIC; irregularities in the attribution of the concessions; disruption of community forest processes; exacerbation of inter-communal conflicts.



OVERVIEW – CARBON OFFSETTING IN EQUATEUR: CHAOS, COMPLEXITY, CACOPHONY

In the heart of the Equateur Province is the recent ‘discovery’ of the world’s largest tropical peatlands, commonly referred to as the Cuvette Centrale. This vast ecosystem, which spans roughly 145,000 square kilometres across the DRC and neighbouring Republic of Congo, is estimated to store 30 billion tonnes of carbon, making it one of the world’s largest terrestrial carbon sinks storing the equivalent of three years’ worth of global fossil fuel emissions.⁹⁵

This has lured many carbon companies to these swamp forests looking to secure cheap land to establish offset projects on. Among those, the Indian firm **Kanaka Management Service (KMS)** in 2021 attempted to set up projects here and across several other provinces including Tshopo, Sankuru, Tshuapa, Equateur, Bas-Uele and Maniema to conserve 70 million hectares of forest – an area twice the size of Germany.⁹⁶ The project was initially listed with Verra under the name of *National REDD+ Project in the DRC* and, according to the information contained in the Verra registry website, had obtained “all relevant formal written approvals of different levels from the National Ministry of Environment and Sustainable Development of Kinshasa... including a ruling on the sharing of carbon credits income among the stakeholders.”⁹⁷

However, it soon became apparent that KMS had misled communities with community forests (CFCLs), including at least 10 in Bikoro and Lukolela territories alone, into signing agreements ceding rights to these areas for 100 years and subjecting them to severe livelihood restrictions. Despite KMS’s claims to the contrary, subsequent field missions by GASHE, APEM and RFUK to the communities in early 2022 confirmed the company’s predatory approach. Community testimonies and copies of the contracts obtained by the researchers revealed a familiar pattern: communities were lured into signing contracts in English, a language they did not understand, without adequate information or time to comprehend the implications – a clear contravention of national FPIC guidelines. Additionally, many of the communities did not yet have the necessary governance structures in place for their community forests to enter into such agreements.⁹⁸ With the support of GASHE and APEM, eight of the communities successfully lobbied MEDD, which eventually suspended the KMS contracts in all the localities where these were signed, which in turn led to Verra rejecting the project.

95 See <https://www.nmbu.no/en/research/true-size-worlds-largest-tropical-peatland-revealed-first-time>, NMBU, 2023.

96 See [Verra registry](#).

97 See above [Verra registry](#).

98 Ministerial Order 025 of February 2016 on the modalities of management and operation of CFCLs.

Now other carbon players have surfaced in the Cuvette Centrale, including **Ledya Group**, a Congolese firm with a history in the logging and oil industries.⁹⁹ Recently, the company has sought to acquire a large portion of forest along National Road 8 to generate carbon credits, an initiative reportedly supported by local officials acting as ‘facilitators’ for the company. Earlier in 2024, Ledya agents had brought some community representatives to an hour-long meeting in the village of Buya 3, where they were promised 10% of the carbon revenues and made to sign contracts they did not understand, according to local sources.

In Basankusu territory, a little-known company named **Berlinia** is reportedly in the process of acquiring a 164,000-hectare concession for a carbon offset project. Although no official information has been released to date, the project has raised serious concerns for the neighbouring Ekolo ya Bonobo Community Reserve. Local residents claim that the concession allegedly grants “private hunting rights” – a provision that could threaten the local bonobo population, hinder the expansion of the Ekolo reserve and jeopardise its long-term viability¹⁰⁰

While company representatives have stated that all necessary documents were obtained and that Free, Prior and Informed Consent (FPIC) was secured during a ten day mission in March 2025, evidence suggests otherwise. Consultations with the Buya community, which borders the reserve, appear to have been limited. Local sources report that only a few individuals were informed about the project, and some community members allege they were pressured into signing an unspecified document. No copies of any FPIC forms or agreements were left with the community.

Another project in the area is **Marché Communautaire Carbone (MACC)**, an initiative led by Congolese and international entrepreneurs. This project spans Equateur and four other provinces (North and South Ubangi, Tshuapa and Mongala), covering 6-10 million hectares. The project focuses on conservation and reforestation, primarily through local community forest concessions. According to available information and discussions held with the project developers, negotiations have taken place at the provincial level and contracts have been signed with some Governors.

The company has stated that communities are direct shareholders in the project and that a second phase will involve consultation and engagement with them, adhering to international standards and national FPIC procedures. It claims 30% of the dividends will be allocated to communities through Community Development Funds, 25% to the investor, 22.5% to the project developer and 22.5% to government entities. However, many questions remain about the effectiveness of community participation, particularly in areas where community forest governance bodies have not yet been established or are not fully operational.

Threats to peace and social cohesion

The commercial potential of the carbon stored in Équateur’s peatlands has heightened social tensions in the region. These tensions are further exacerbated by unclear land tenure rights, which have led to competing claims and growing resentment among some communities. For instance, friction has emerged between the Indigenous ‘Pygmy’ people of Lokolama and their Bantu neighbours in Penzele. Although these communities have historically coexisted peacefully, the increasing involvement of carbon market actors has deepened mistrust. The boundaries of their community forest concessions are now being contested due to the rising value of the peatlands. As a result, efforts to co-manage their community forestry concessions have stalled, placing additional strain on inter-community relations.

99 In 2019, the company obtained an exploration permit for the Yema and Matamba-Makanzi oil blocks in Kongo Central province, see [Leyda Groupe](#).

100 Information provided by representatives of the association Friends of Bonobo (ABC) who manages the Ekolo ya Bonobo Community Reserve in Equateur province and other independent journalists operating in the area.

Lack of Free, Prior and Informed Consent

The communities of Bikoro territory are no strangers to carbon cowboys. Not long had KMS's opportunistic plans been unmasked, a Consortium composed of three companies – namely Bioeconomy, Blattner family-owned Société Environnementale de l'Équateur (SEE) and an Australian firm **Western Australian Trade and Investment in Congo Pty Ltd (WATICO)** – signed a contract with the Provincial Governor for a jurisdictional-scale REDD+ project covering roughly six million hectares in the form of conservation concessions and community forests. The contract, which was negotiated without any involvement of the affected communities or local civil society, granted the company exclusive rights to carry out biodiversity protection activities, securing it 60% of the net profits, leaving local communities with a mere 15%.¹⁰¹

The agreement was short-lived due to internal disagreements between consortium partners, resulting in litigation before the Tribunal de Grande Instance de Kinshasa. Bioeconomy eventually withdrew from the consortium, citing the ongoing revision of the Verra methodology that would not authorise projects on wetlands and peatlands.¹⁰² The three parties settled the judicial proceedings, leaving WATICO as the sole project implementer.

However, the inhabitants of the community forests visited were unhappy with this arrangement, feeling it was imposed on them by the Provincial government without their consent. During exchanges, they lamented that WATICO representatives had only visited their villages once, promising to build roads, houses and hospitals. Yet, after more than a year, nothing had been done, and the representatives had never returned to their forests.

“Since the discovery of the peatlands and the arrival of all these [carbon] players, the community has become even poorer. WATICO adopted a very brutal approach and imposed itself through the presence of the local authorities, who didn't allow community members to express themselves freely. They forced us to sign a contract under pressure and left with no copies for the community.”

- Local chief

Representatives from WATICO also visited the neighbouring community forest of Penzele, promising to help the village enter the carbon market. During the only awareness-raising meeting, many participants did not speak up for fear of retaliation due to the presence of local authorities, although a few did denounce the lack of respect for their customs. The inhabitants of Penzele refused to sign the *cahier de charges* with WATICO, as they had not been consulted or involved in any preliminary activities and did not understand carbon markets. Following this resistance, WATICO reportedly adopted a new strategy, bringing a small group of community representatives to Mbandaka, the provincial capital, to continue negotiations away from scrutiny.

Months later, the reality for the communities of Bikoro remains grim. Nothing has been done on the ground, and many fear that carbon projects will continue to be imposed on them through force and manipulation. Throughout our visit, inhabitants lamented the lack of sensitisation around carbon markets, which makes them vulnerable to scams and prevents them from managing their forests for their own benefit.

¹⁰¹ See [Public Service Delegation Contract for the Development and Implementation of a Jurisdictional and Nested REDD+ Programme \(Forests, Peatlands, and Biodiversity\) in the Province of Équateur](#) (*Contrat de délégation de service public pour l'élaboration et la mise en œuvre d'un programme juridictionnel et imbriqué REDD+ (forêts, tourbières et biodiversité) dans la province de l'Équateur*).

¹⁰² Letter sent to Bioeconomy to the Provincial Governor of Equateur to withdraw from the Consortium following the revision of Verra methodology for peatlands and wetlands.

“Because of all these carbon market players, our villages have become like airports, with lots of people arriving, taking our resources and leaving without leaving us anything.”

- Inhabitant of Ekele

Legal, governance and equity issues

According to information now in possession of RFUK, WATICO has now been dissolved,¹⁰³ raising the question as to how a company which is no longer legally active is able to operate in this way. This might be a reason why in February 2025, the provincial government signed an agreement for what seems to be yet another jurisdictional scale project with the US-based firm **Terra Global Capital**, with the aim to support the production and sale of carbon credits in CFCLs across the province.¹⁰⁴

The multitude of actors and initiatives vying for control over Equateur’s carbon-rich peatlands exemplifies the broader trend occurring across the DRC. This alarming yet unsurprising pattern sees private and public interests seeking quick profits while leaving local communities – the true custodians of the Congolese forests – in a state of uncertainty and unfulfilled promises.

The sheer scale of these projects, if they ever come to fruition, means they are certain to overlap with other ongoing or planned forest carbon initiatives (leading to possible double counting of credit generation), logging concessions, protected areas and other land uses. These projects, often planned in ecologically sensitive and socially complex areas, also risk denying communities’ right to self-determination and, in some cases, their hopes of establishing community forests. In a context of weak governance, competing interests and an unclear land-use planning regime, this could fuel land conflicts and compromise forest protection efforts in the country.

3.3 LESSONS FROM THE CASE STUDIES

The case studies and overview table depict a ‘wild west’ picture of the carbon industry in the DRC, where firms and individuals, often with minimal background in the sector, are acquiring vast tracts of forest land ostensibly for conservation purposes. Few if any carbon projects currently underway or planned in the country can be labelled as ‘high integrity’, and most are unlikely to be certified by international verification bodies, which have themselves faced heavy criticism. Similarly, these projects should not be validated at the national level unless developers take serious steps to adhere to the Cancun Safeguards and the criteria set forth in the homologation process.¹⁰⁵

3.3.1 Illegalities and compliance issues

Our investigation reveals systemic and widespread irregularities within the carbon industry in the DRC. These issues stem from inadequate legislation on carbon markets, weak oversight and enforcement by regulatory bodies and corrupt practices among government actors. Consequently, tens of millions of hectares of intact forests are being misappropriated under the guise of being conserved.

The DRC lacks a clear and well-defined framework for regulating the conversion of logging concessions into conservation ones. Logging firms exploit these loopholes to circumvent the national logging moratorium and continue their operations. Conservation concessions are frequently allocated in violation of the Forest Code and the regulations established in the 2011 ministerial order, as seen in the cases of WWC and SOCODEV.

Additionally, MEDD’s allocation of carbon projects and conservation concessions highlights a persistent conflict of competencies between central and provincial governments. According to Article 204,20 of the DRC constitution, provincial governments have exclusive legislative authority over forest issues.

¹⁰³ Company Database Orbis, information accessed on 4 November 2024. Also, the Australian Business Registry shows that the company Western Australia Trade and Investment in Congo Pty LTD has been cancelled on 17 January 2024.

¹⁰⁴ Interview with Michael Cullen, Terra Capita LLC, see Eve Bazaiba on X: «En marge de la 20ème session du Forum des Nations-Unies sur les forêts, la #RDC a fait savoir son ambition climatique et écologique à travers un side event organisé le 07 mai 2025. Retour en images sur cet événement de la diplomatie environnementale du Pays-Solution.

¹⁰⁵ See Annexe 1 of the Ministerial Order 047 on the REDD homologation process.

3.3.2 Lack of stakeholder engagement and inclusive decision-making

According to the DRC's interpretation of the Cancun Safeguards, REDD+/carbon initiatives must ensure full stakeholder participation, respect for FPIC and inclusion of marginalised groups. However, interviews with community members reveal a stark disconnect between these standards and actual practice. Fuelled by weak governance, corruption and land tenure insecurity, companies and elites have acquired vast land holdings through highly opaque means.

FPIC processes were often reduced to token exercises, involving village chiefs coerced through manipulation or bribes. Even when consent was formally obtained, it was neither "free" nor "prior," as local authorities often suppressed genuine participation. Consultations, when they occurred at all, were brief and insufficient for communities to grasp the complex implications of carbon projects. Among the dozens of people researchers spoke with, very few could explain carbon markets or what their contracts entailed. Women were particularly marginalised, while youth expressed frustration over processes being dominated by local elites. Additionally, most villages lacked copies of the agreements they had signed, leaving them without a legal basis for future recourse.

3.3.3 Impacts on social cohesion and human rights

The carbon offset projects studied have both exacerbated social tensions within communities and increased the risk of inter-communal conflict. By favouring some groups over others, they have reinforced power imbalances and marginalised vulnerable groups. Incidents of violence have been reported in some cases, with members of the security forces assaulting, arresting and arbitrarily detaining peaceful protesters.

The lack of inclusive community participation has led to divisions and tensions between villages that had traditionally coexisted in harmony. This was evident in the WWC concession in Basankusu and the neighbouring community forests of Penzele and Lokolama. Similarly, in the Tshopo Lomami Grouped Project, the inclusion of communities without customary ownership of forest land sparked resentment among those who were excluded.

3.3.4 Negligible socio-economic benefits for local and Indigenous communities

Despite promises of improved incomes and economic opportunities, most REDD+/carbon projects in the DRC have failed to deliver tangible benefits. Many remain inactive for months or even years after their launch. With most projects still awaiting national validation and a lengthy process to verify and sell credits in the international market, communities are left in limbo, facing uncertainty and economic vulnerability.

The DRC government encourages such projects, raising unrealistic expectations and offloading its responsibilities onto companies to provide basic services like schools and healthcare, as the WWC Mai Ndombe case shows. Communities lack basic information on the credits being generated in their name and the unreliable nature of carbon markets makes them ill-suited for sustainable rural development.

The absence of clear and transparent benefit-sharing rules is a particular source of frustration and mistrust. The jurisdictional Mai-Ndombe Emissions Reductions Programme (which includes the private WWC concession as a nested project) appears to be the only one to have a benefit-sharing plan explicitly including IP&LCs.¹⁰⁶ However, the verification of the emissions reduction credits is still ongoing years after the agreement was signed.¹⁰⁷

3.3.5 Lack of conflict resolution mechanisms

This multitude of issues is compounded by the near-total absence of effective and accessible grievance and redress mechanisms for local communities. In all the villages visited, people were unaware of whether such mechanisms existed, how to access them or whom to contact. Furthermore, there is no national-level mechanism, despite reference to this in the National REDD framework strategy.

106 [Mai Ndombe Emission Reduction programme, DRC, Benefit Sharing plan](#), Forest Carbon Partnership Facility, 2022.

107 [DRC 1st ER-MR GHG accounting July 17-2023](#) in ER Monitoring Report (ER-MR) Forest Carbon Partnership Facility (FCPF), 2023.

3.3.6 Lack of transparency

The DRC's interpretation of the Cancun Safeguard on transparent and effective national forest governance structures requires that REDD+/carbon initiatives promote access to information, justice, gender equality, respect for land rights and effective monitoring and verification mechanisms. However, the lack of transparency and accountability in the carbon industry is alarming. Little information is available about the companies involved in offset projects, raising questions about the government's due diligence in awarding concessions. The absence of a functioning online carbon registry¹⁰⁸ prevents the verification and cross-checking of information necessary to ensure corporate accountability.

In summary, no one in the DRC government seems to have a complete picture of who is selling what in the Voluntary Carbon Market, how much profit carbon agents are making or the revenues that the government and communities should receive. Like extractive industries in the country, the lack of clear regulation, opacity and weak governance enables officials and elites to generate private gain rather than public income. The opaque and complex nature of the forest carbon market makes it particularly vulnerable to fraud.

3.3.7 Denial of self-determination and disruption of Community Forest processes

Forest carbon projects can interfere with collective land tenure systems, limiting the opportunity for rights-based approaches to forest protection. They are restricting access and use of forests, undermining communities' right to self-determination and preventing communities from obtaining community forest titles (CFCLs) to their ancestral lands.

Another trend is emerging whereby project developers and officials are attempting to co-opt existing CFCLs to enter the carbon market, as the KMS case shows.

While some view carbon markets as a much-needed source of revenue for communities, there remains limited understanding of how such markets function and communities can be misled about their rights and obligations, fostering unrealistic expectations, especially in the short term.

3.3.8 Scarce or unknown results in terms of climate action

It is nearly impossible to assert that forest carbon initiatives in the DRC are contributing to the fight against climate change. Most projects in the country have not yet commenced their activities, and for the few claiming to reduce deforestation, there are few documents available to analyse projected avoided emissions, nor data on the current risk of deforestation in the project areas.

Available information suggests that the impact has been very limited. For WWC's Mai Ndombe REDD+ project, independent rating agencies have flagged a high risk of over-crediting. In the case of the Isangi REDD+ project, the only monitoring report available – covering the period from 2009 to 2013 – shows mixed results, but no independent verification or third-party ratings have been conducted to date.

As numerous studies have shown, verifying the impact of emission reductions from carbon projects is inherently challenging. Over-crediting can be a structural fault in certification systems like Verra and occurs even in countries with stronger governance and technical means, thus increasing overall carbon emissions by allowing purchasing companies to continue business-as-usual activities.

Finally, the ongoing ineffectiveness of forest carbon offsetting in reducing emissions raises serious doubts about the DRC's ability to meet its Nationally Determined Contribution (NDC) to the 2015 Paris Accord targets and its credibility as a self-proclaimed 'solutions country' to the climate and biodiversity crises.

¹⁰⁸ The registry has now been made available but contains limited and fragmented information.

4. ALTERNATIVES AND GOOD PRACTICES

Greater funding and support are urgently needed in the Congo Basin to stem and reverse deforestation and support sustainable development for the tens of millions of people who depend on these forests, especially considering recent foreign aid budget cuts. A 15-year fixation on voluntary carbon markets in the DRC and other regions has not yielded the desired results and has diverted attention from potentially more effective strategies, which must be more seriously explored.

Alternative sources and channels of funding

It seems unlikely that voluntary carbon markets—given their inherent price volatility, complexity, and vulnerability to creative accounting—can deliver widespread and lasting benefits for the climate, the DRC's forests, and its people. Instead, **non-market approaches (NMAs)**, as outlined in Article 6.8 of the Paris Agreement, should be prioritised. These approaches offer the potential for more predictable, equitable, and sustainable outcomes, better aligned with the long-term needs of both ecosystems and communities.

As highlighted in the *Beyond Offsets* report by RFUK, FERN, and Forest Peoples Programme, there are numerous sources of non-market funding that could be mobilised – including progressive taxation, the redirection of harmful subsidies and debt cancellation – provided there is sufficient political will. In addition, targeted philanthropic support and responsible private-sector engagement can play a complementary role in supporting sustainable forest protection and climate action.¹⁰⁹ There could potentially also be a role for new mechanisms such as the **Tropical Forest Forever Facility (TFFF)**, which aims to provide significant, steady and simple funding to tropical forest countries and IP&LCs based on standing forests, if sufficient social and environmental safeguards can be built in.¹¹⁰

Crucially, NMAs must be channelled more directly to forest communities and their representative organisations through simple accounting methods, thus reducing transaction costs and the need for financial intermediaries.¹¹¹



¹⁰⁹ See [Beyond Offsets: People and Planet-centred Responses to the Climate and Biodiversity Crisis](#), Rainforest Foundation UK, FERN and Forest Peoples Programme, 2024.

¹¹⁰ See [Briefing note on the Tropical Forest Forever Facility](#), RFUK et al., 2025.

¹¹¹ Article 6.8 mandates a web-based platform to facilitate the identification, development and implementation of such projects.

Table 1: Concerns about carbon offset markets and how could NMAs offer a different model¹¹²

CARBON OFFSET MARKETS		NMA MODEL
Are emissions reduced?	No: Offsets and markets are central to the idea of 'net-zero' emissions, which means that overall, the emissions balance is zero (no significant reductions).	NMAs can deliver real emissions reductions, not misrepresented through offsets or trading. And they should accrue in the landscapes where the action takes place.
Who (historically) has been doing the emitting?	Markets fail to recognise historic carbon debt. Instead, they represent an economic loophole through which historic emitters can continue emitting while they at the same time argue that they are addressing their disproportionate contribution to historic global emissions.	If finance is not centred on a transactional system, payments or other support can be given recognition of the fact that the peoples most affected by climate change did least to cause it.
Who owns the carbon in a forest?	Secure ownership of the asset, i.e. land (and forest) is essential to the market. But land tenure is insecure and entrenched power imbalances use this to justify land grabs.	NMAs can create the space for changing the power balance in favour of self-determination by customary landowners. They can help secure land rights without furthering state and corporate land grabs.
How much carbon is there?	Measuring carbon in natural ecological systems is very complex and a vast and convoluted system has arisen to measure and trade carbon in an attempt to meet the accuracy a market requires. This requires many intermediary actors and significantly raises transaction costs.	If finance is not centred on a transactional system, it can de-link carbon measurements from conservation and mitigation actions; and potentially increase net local benefits for forest owners.
Where does the money come from?	This is unpredictable: countries, companies and traders enter the market, based on business decisions, offset plans or regulations.	In 2021, US\$1.7 billion was promised by 22 governments and philanthropists to advance tenure rights and support guardians of forests. Other commitments have since come on stream. Other possible sources of finance are carbon taxes, debt cancellation and corporate payments.
What are the transaction costs?	International traders and speculators are likely to take the largest share of the carbon value as they seek to do deals early and 'buy low, sell high'. They presume carbon prices will go up as pressure to meet net zero emissions increases.	If there is no trading element there is no risk of market speculation that significantly increases costs whilst doing little to drive real action. The greater part of any investment is able to go to those doing the most to protect forests.
Who sets the price?	Market forces determine the price of carbon as a commodity, which so far has both fluctuated hugely and decreased dramatically, failing the UN criteria for predictable funding.	If support for forests and people is de-linked from the price of carbon it can be more predictable and secure, although some costing of mitigation actions may still be needed.
Under what laws?	Market-based deals are being negotiated prior to legislation to govern them, denying customary owners their legitimate property rights and their fundamental rights to self-determination, free, prior and informed consent and right to information.	The legal frameworks for non-market finance and other support are largely in place and can include further progressive legal reform for example on collective tenure rights.
Who claims the emissions?	Claims are recorded through NDC reporting, but there is a risk of double-counting, in both the offset buying and selling country. There may also be competition between companies and governments, utilising Article 6.4 versus 6.2.	100% of the mitigation effort of a NMA is recorded on the NDC of the country where the mitigation actions take place, thereby raising social and environmental integrity and true ambition.
What about biodiversity, what about adaptation?	Other than the 5% adaptation levy under Article 6.4 (but not 6.2 or the voluntary market), trading is only in terms of carbon emissions. Biodiversity credits assume all biodiversity is either equal or can be quantified.	NMAs have the flexibility to help address multiple needs, linking protection and recovery of ecological integrity and resilience through 'Joint Mitigation Adaptation' and can include policy, legislative, technical and legal assistance, for example.

The carbon markets column responds directly to the questions in the first column. NMAs do not directly correlate to the same questions as they represent a different paradigm from pricing and transactions.

¹¹² See [Beyond Offsets: People and Planet-centred Responses to the Climate and Biodiversity Crisis](#), Rainforest Foundation UK, FERN and Forest Peoples Programme, 2024.

Good practices and enabling conditions¹¹³

This report has highlighted significant issues with land-based carbon offsetting in the DRC. Key problems include insecure land ownership, leading to land grabs and exploitative deals; lengthy monitoring, reporting and verification (MRV) and certification processes that delay benefits to forest communities; and a lack of investment in projects or capacity building due to insufficient upfront financing. Addressing these issues is crucial for reimagining the financial architecture for forest protection in the country.

Clarifying and strengthening community tenure, including through the DRC's innovative **community forest framework**, is essential. With their perpetual rights, internal governance structures and multi-uses, CFCLs can under the right conditions provide an ideal mechanism for channelling direct, non-market-based payments for environmental services (PES) investments into forest areas. Indeed, Congolese legislation, through Ministerial Order 025 of 2016, allows communities to dedicate part of their concession for activities such as carbon sequestration and biodiversity protection. During fieldwork, several instances were documented of communities engaging in conservation and reforestation activities outside of the voluntary carbon markets.

With already more than 240 CFCLs covering over 4.5 million hectares in the country,¹¹⁴ there is significant potential to develop NMAs at scale. For community forests to be able to benefit effectively and equitably from non-market payments for environmental services, several enabling conditions are necessary:

Strong community leadership: Effective local governance bodies such as Councils of Elders, Community Assemblies, Local Management Committees and Local Committees of Control, Monitoring and Evaluation are essential to maintain social cohesion, gender equity and effective implementation of PES activities.

Community mapping and inclusive land-use planning: Participatory maps and simple management plans are crucial to ensure community forests reflect community tenure systems and development visions.

Capacity to monitor threats: Strengthened community capacities to monitor PES activities and to enforce and monitor local rules concerning access and use of forests.

Support for community entrepreneurship: PES should be perceived as part of a broader mix of green economic activities in CFCLs. Hence, strengthening informal producer groups and forming cooperatives can facilitate peer-to-peer learning, build economies of scale, attract responsible buyers and increase access to finance.

Awareness and capacity building for PES schemes: Sensitisation and training so that communities can ensure transparent and accountable implementation of PES activities.

Proximity support and long-term commitment from NGOs: Partnerships should be based on equality rather than a paternalistic approach, recognising that CFCLs are a relatively new form of governance needing time to mature.

More support for local administrations: Local administrations must be supported to play their role in supporting and monitoring PES schemes, including through the development of fiscal measures.

¹¹³ A second report in this two-part series will explore in more depth the enabling conditions for effective and equitable community-led payment for environmental services in the Congo Basin.

¹¹⁴ See the DRC [Community Forest Database](#).

5. CONCLUSION AND RECOMMENDATIONS

Despite the government's positive rhetoric, the poor quality of carbon projects in the DRC, combined with a lengthy verification process, huge surplus and low price of credits on the international market means that they are unlikely to deliver benefits for forests and people anytime soon. On the ground, forest carbon initiatives are proliferating chaotically and without sufficient safeguards. There is a troubling pattern of power abuse, corruption and impunity emerging, mirroring the exploitative and exclusionary practices seen in the extractive industries. Without urgent action, this trend poses significant risks for local communities and forest governance in the country.

5.1 RECOMMENDATIONS TO THE DRC GOVERNMENT

- Overhaul the regulatory and institutional framework for nature markets and payment for environmental services to ensure due process and protect local and Indigenous communities' rights, aligning with Cancun safeguards, the Safeguard Information System (SIS) and national legislation.
- Urgently review all carbon offset projects and conservation concessions and suspend or cancel those which do not conform to relevant legislation.
- Enforce a moratorium on new carbon projects and conservation concessions until a new legal and institutional framework is developed in coherence with other laws and policies related to land and forest governance.
- Ensure timely and effective operationalisation of the Regulatory Authority on Carbon Markets, avoiding duplication with CN REDD.
- Make the national register of carbon projects fully accessible and up to date.
- Adopt a new national community forest strategy to expand and consolidate CFCLs, incorporating payment for environmental services and more direct funding for IP&LCs.
- Strengthen the capacity and autonomy of local and provincial administrations to oversee and administer carbon and payment for environmental services projects.

- Develop a robust and transparent system for analysing deforestation levels and risks in REDD+ and offsetting project areas.

5.2 RECOMMENDATIONS TO THE DRC'S INTERNATIONAL PARTNERS

- Refrain from using carbon offsets as part of 'net zero' commitments and channel investments to non-market-based financial alternatives that provide more direct and reliable funding for forest protection and local communities.
- Formally request a detailed explanation from MEDD regarding the legal and procedural basis for allocating conservation concessions.
- Support the DRC government in establishing robust MRV and financial management systems for REDD+ and carbon offset projects to ensure transparency, accountability and equitable distribution of benefits.
- Increase support to local civil society organisations to play a watchdog role and to assist local communities.

5.3 RECOMMENDATIONS TO CARBON PROJECT DEVELOPERS

- Uphold the principle of 'do no harm' and ensure full compliance with national legislation and the Cancun Safeguards on FPIC, benefit sharing and accountability by:
 - Drafting contracts and cahier des charges agreements in local languages and incorporating termination and renegotiation clauses.
 - Committing to a fair share of community benefits regardless of company profits and ensuring full financial disclosure.
 - Establishing accessible and responsive grievance and redress mechanisms.

5.4 RECOMMENDATIONS TO VERRA

- Suspend the Tshopo Lomami Grouped REDD+ Project certification pending an independent investigation of rights abuses and redress for impacted communities.
- Review the DRC projects in the Verra pipeline for compliance with social and environmental safeguards and take prompt remedial actions where needed.

5.5 RECOMMENDATIONS TO CLIENT COMPANIES

- Share concerns with carbon project developers and verification bodies, urging them to address identified failings and take remedial actions.
- Explore non-market approaches that directly support local communities.
- Enhance efforts to achieve real emission reductions within supply chains to lessen reliance on offsetting.

5.6 RECOMMENDATIONS TO CIVIL SOCIETY ORGANISATIONS

- Support IP&LCs in understanding and exercising their rights in relation to carbon projects and to negotiate fair terms if they decide to proceed.
- Ensure inclusive participation of IP&LCs, women and other marginalised groups in key negotiations and decision-making processes related to carbon offsetting and forests in general.
- Support local communities with tools and training to quantify environmental action costs and make informed decisions.
- Continue supporting community governance bodies to increase their effectiveness, accountability and inclusion.



Rice mill, CFCL village Batikambema.

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ANNEX 1: LIST OF CARBON PROJECTS IN THE DRC BY HECTARES*

Project name	Location (territory)	Location (province)	Proponents/proj.developers	Surface ha	Project status	Registration standards
National REDD Project in DRC (KMS)	Multiple provinces	Equateur	Kanaka Management Services (KMS)	72010950.00	Ongoing	Rejected from Verra
MACC Marche Communautaire Carbone	Different territories	Equateur, North Ubangi, South Ubangi, Mongala, Tshuapa	MACC Earth	10000000.00	Contract signed in North Ubangi and Equateur	No data avilable
WATICO	7 territories	Equateur	Bioeconomy, Watico and Société Environnementale de l’Equateur	6000000.00	Contract signed	No data avilable
Sankuru Peace Forest Grouped REDD Project	Sankuru	Sankuru	Bonobo Conservation Initiative (BCI), Future Carbon International LLC, Future Carbon Holding S.A., Fanfare-verte Inc.	2190831.00	Planned	Under validation with Verra
DRC REDD Carbon Credit Harvesting Project	Several locations in former Equateur province	Equateur	R.E.D.D. Carbon Credit Harvesting L.P, GEC Communities II Inc., Global Treaty Corporation (GTC)	1346360.00	Planned	Under validation
Tshopo Lomami Grouped REDD Project	Isangi, Opala	Tshopo	Africa Climate Investments LLC, Renewable Solutions LTD, Green Initiatives LTD, Biodiversity Developments LTD, Future Carbon Holding S.A., Fanfare-verte Inc.	717665.00	Ongoing	Under validation with Verra
Itombwe	Itombwe reserve	South Kivu	MEDD, WCS	648989.00	Cannot be confirmed	No data avilable
Kokolopori bonobo peace forest grouped REDD project	Kokolopori bonobo reserve	Tshuapa	Future Carbon International	421000.00	Planned	Under validation with Verra
NKUBA REDD project	Nkuba conservation area	North Kivu	Dian Fossey Gorilla Fund + WWC	408778.00	Started	Registration and verification approval requested
ETS MOTEMA	Ingende/Monkoto	Tshuapa	Motema	389720.00	Formal notice	No data avilable
Tayna / Kisimba-Ikobo REDD+ project	Tayna and Kisimba-Ikobo Nature Reserves, Lubero and Walikale, Nord-Kivu Province	North Kivu	Conservation International; Walt Disney	330000.00	Cannot be confirmed	No data avilable
WWC-Congo (WWC)	Businga	North Ubangi	WWC-Congo (WWC Group)	299995.00	Contract signed	No data avilable
The Mai Ndombe REDD+ Project (WWC)	Inongo territory	Mai Ndombe	WWC-Congo (WWC Group)	299640.00	Ongoing	Yes (Verra)
TOBATELE LA REDD+	Inongo territory	Mai Ndombe	SOMICONGO Forest Conservation SARL	294014.00	Started	No data avilable
SOMICONGO	Inongo	Mai Ndombe	SOMICONGO	294014.00	Contract validated with recommendations	No data avilable
KFBS 046/20	Inongo /Bikoro	Mai Ndombe	Kongo Forest Based Solutions (KFBS)	292283.00	Formal notice	No data avilable
SOCODEV 2	Banalia/Baboro	Tshopo	SOCODEV	291046.00	Contract signed	No data avilable
ERA Congo	Budjala	South Ubangi	ERA Congo	291046.00	Planned	No data avilable
Tradelink 015/20	Isangi/Opala	Tshopo	Tradelink	288978.00	Suspended	No data avilable

* This information is correct to the best of our knowledge at the time of publication. Please contact us for more information on our sources.

Project name	Location (territory)	Location (province)	Proponents/proj.developers	Surface ha	Project status	Registration standards
KFBS 056/20	Isangi/Yahuma	Tshopo	Kongo Forest Based Solutions (KFBS)	288652.00	Formal notice	No data available
KFBS 045/20	Oshwe	Mai Ndombe	Kongo Forest Based Solutions (KFBS)	288452.00	Formal notice	No data available
KFBS 055/20	Bomongo, Kungu	South Ubangi	Kongo Forest Based Solutions (KFBS)	286752.00	Fomal notice	No data available
SORFA 1 (WWC)	Bikoro	Equateur	SORFA (WWC group)	282295.00	Contract signed	No data available
SORFA 2 (WWC)	Yamandundu/Wahanga (Basoko)	Tshopo	SORFA (WWC group)	282295.00	Contract signed	No data available
ERA Congo	Kungu	South Ubangi	ERA Congo	277584.00	Planned	No data available
Tradelink 14/20	Basoko	Tshopo	Tradelink	256562.00	Suspended	No data available
SODEFOR	Oshwe	Mai Ndombe	SODEFOR	253570.00	Contract signed	No data available
Tradelink 10/20	Befale	Tshuapa	Tradelink	242495.00	Suspended	No data available
KFBS 058/20	Kutu	Mai Ndombe	Kongo Forest Based Solutions (KFBS)	238297.00	Formal notice	No data available
Tradelink 11/20	Befale	Tshuapa	Tradelink	237482.00	Suspended	No data available
SOCODEV 1	Banalia/Bamanga	Tshopo	SOCODEV	226125.00	Contract signed	No data available
Forest Credit	Befale	Tshuapa	Forest Credit	220000.00	Cannot be confirmed	No data available
KFBS 48/20	Inongo/Lukolela	Equateur	Kongo Forest Based Solutions (KFBS)	218927.00	Formal notice	No data available
Mitshosi- Kabobo	Ngamikka Park	Tanganyika	ICCN, Wildlife Conservation Society	218228.00	Cannot be confirmed	No data available
KFBS 53/20	Kutu	Mai Ndombe	Kongo Forest Based Solutions (KFBS)	213983.00	Formal notice	No data available
KFBS 52/20	Oshwe	Mai Nbombe	Kongo Forest Based Solutions (KFBS)	211238.00	Formal notice	No data available
Tradelink 13/20	Boende	Tshuapa	Tradelink	210043.00	Suspended	No data available
Isangi REDD+ Project	Isangi territory	Tshopo	Jadora and SAFBOIS	201731.00	No more active	Withdrawn from Verra
KFBS 51/20	Oshwe	Mai Ndombe	Kongo Forest Based Solutions (KFBS)	101913.00	Formal notice	No data available
ERA (WWC)	Basankusu	Equateur	ERA Congo (WWC Group)	188835.00	Contract signed	No data available
Bernilia Conservation	Basankusu	Equateur	Bernilia	163943.00	Planned	No data available
KFBS 050/20	Bolomba	Equateur	Kongo Forest Based Solutions (KFBS)	156757.00	Formal notice	No data available
KFBS 054/20	Lisala	Mongala	Kongo Forest Based Solutions (KFBS)	150703.00	Formal notice	No data available
Tradelink 12/20	Befale	Tshuapa	Tradelink	140818.00	Suspended	No data available

Project name	Location (territory)	Location (province)	Proponents/proj.developers	Surface ha	Project status	Registration standards
Mt Hoyo pilot REDD+ project	Irumu territory	Ituri	WCS	135701.00	Ended	No data available
Haut Katanga Reforestation Project	Kasenga	Haut Katanga	Carbon Ventures Africa	125986.00	Planned	Under development with Verra
Baulu Project	Befale	Tshuapa	Industrie Forestiere du Congo / FRM Commitment, KinCongo Nature Carbon Company (KNCC)	116181.00	Planned	Under development with Verra
KFBS 047/20	Bolomba	Equateur	Kongo Forest Based Solutions (KFBS)	110668.00	Formal notice	No data available
SOCIETE AFRICAINE DE BOIS (SAFBOIS)	Isangi	Tshopo	SAFBOIS	73278.00	Contract terminated	No data available
CPDH	Bafwasende (Barumbi Tshopo)	Tshopo	CPDH	49150.00	Contract signed	No data available
Forets Arbres Plus (FAB)	Walikale	North Kivu	FAP	41252.00	Cannot be confirmed	No data available
KWANGO RIVER PROJECT, DEMOCRATIC REPUBLIC OF CONGO	Bateke Plateau	Kongo Central	FRM Commitment ;e KinCongo Nature Carbon Company (KNCC)	25699.00	Planned	Under validation with Verra
DR CONGO MANGROVE BLUE CARBON PROJECT	Moanda	Kongo Central	ClimeTrek Ltd / Groupement Malela/ Groupement Kinlau	23684.00	Planned	Under validation with Verra
KFBS 50/20	Oshwe	Mai Ndombe	"Superposition avec Groupe Service CCF 011/20"	21922.00	Formal notice	No data available
KFBS 49/20	Oshwe	Mai Ndombe	"Superposition avec Groupe Service CCF 011/20"	15485.00	Formal notice	No data available
N'situ Pelende	Kenge	Kwango	Colruyt Group	14430.00	Planned	Listed with Gold Standard
Jatropha Cultivation in the Democratic Republic of Congo	Kikwit	Bandundu	No data	14000.00	Cannot be confirmed	No data available
South Kwamouth REDD+ integrated agroforestry pilot project	South Kwamouth	Mai Ndombe	Novacel	10000.00	Cannot be confirmed	No data available
Integrated REDD+ Luki	Mayombe forest	Kongo central	WWF Belgium	9999.00	Ended	No
Geographically Integrated REDD+ Pilot: Mambasa	Mambasa	Ituri	Wildlife Conservation Society	9999.00	Ended	No
PERMACULTURE INITIATIVE THROUGH COMMUNITY PARTICIPATION	Moba	Tanganyika	ALLCOTT AG	9400.00	Planned	Under development with Verra
CEDIM	Bikoro	Equateur	CEDIM	9150.00	Contract signed	No data available
Reforestation project using native species in Maringa-Lopori-Wamba region / BONOBO PEACE FOREST	Luo Scientific Reserve and Kokolopori Bonobo Reserve	Tshuapa	BCI, AVSI, University of Florence, Woods Hole Research Center	5000.00	Planned	No data available
Ibi Bateke degraded savannah afforestation project for fuelwood production	Maluku territory	Kinshasa	Novacel/ WB Bio Carbon Fund , CASCADE Africa	4129.00	Ongoing	No data available
Ekomakala	Virunga National Park (Nyragongo, Masisi, Rutshuru)	North Kivu	WWF Belgium/WWF Congo	3000.00	Ended (first phase)	Registeredwith Gold Standard

Project name	Location (territory)	Location (province)	Proponents/proj.developers	Surface ha	Project status	Registration standards
SCIRESS	Aketi territory	Bas Uele		NA	Cannot be confirmed	No data avilable
Lukenie REDD pilot project	Lukenie, Bandundu	Congo Central	Agritrop, SODEFOR , FMR	NA	Ended	No data avilable
Societe Conservation Forestiere (SCF)	Budjala	South Ubangi	Societe Conservation Forestiere	NA	Cannot be confirmed	No data avilable
ECOWOOD	Walikale/Beni/Lubero	North Kivu	EcoWood	NA	Contract signed	No data avilable
PGAPF Kinshasa	Kinshasa	Kinshasa	NA	NA	Cannot be confirmed	No data avilable
Ledya Group	Baboro (Ekele)	Equateur	Ledia Talk	NA	Planned	No data avilable
Societe Conservation Forestiere (SCF)	Budjala	South Ubangi	Société de Conservation Forestière	NA	Cannot be confirmed	No data avilable
KNCC SAS	Befale	Tshuapa		NA	Cannot be confirmed	No data avilable
Greenipath		Mai Ndombe. Equateur		NA	Cannot be confirmed	No data avilable

NON GEOGRAPHY-BASED DEALS

Project name	Location (territory)	Location (province)	Proponents/proj.developers	Surface ha	Project status	Registration standards
Blue Grace Energy Bolivia/ACE	VCM certification scheme	country wide		80000000	No data available	
dClimate	MoU for carbon credits	country wide		N.A	No data available	
EQX Biome	offer for carbon credits	27 oil blocks		N.A	No data available	
Terra global	Jurisdictional project	Equateur		N.A	No data available	

ANNEX 2: BLATTNER RESPONSE

De : [REDACTED]

Envoyé : 02 July 2025

À : [REDACTED]

Objet : Re:TSHOPO LOMAMI GROUPED REDD PROJECT - Request for information

Hello [REDACTED] -

Please see my responses inline below, and please let me know if you have any further questions.

Best Regards,

[REDACTED]

On Jun 24, 2025, [REDACTED] wrote:

Dear [REDACTED]

Dear [REDACTED],

Over the past months, Rainforest Foundation UK and its Congolese partners have conducted a field documentation and research work on carbon offsetting initiatives in the Democratic Republic of Congo (DRC), with the aim to understand the socio-economic impact of these projects from the perspectives of affected Indigenous People and local communities, and as well to understand the potential additionality in terms of climate action of such projects and their conformity with Congolese and international laws and standards.

As part of this research, we have investigated, among others, the Tshopo Lomami REDD Grouped project in Opala and Isangi territories in the DRC Tshopo province, which is implemented by Africa Climate Investments LLC and by three companies belonging to Brandon Blattner, namely Renewable Solutions LTD, Green Development LTD and Biodiversity Development LTD, and which is currently 'under validation' with the Verra Carbon Registry.

The result of this research will be soon published in the form of a written report and a short film documentary.

For this reason, we would like to share with you a summary of our key findings and some questions concerning the Blattner-owned concessions ahead of the publication of our research, in order to give you the possibility to provide feedback or to correct or contest information that we have been able to collect through our field research and interviews. **We would be grateful if you could provide us with your answers or clarifications by Friday 4 July 2025. We intend to publish your response in full.**

Please find below a summary of the results of our investigations and the questions we would like for you to answer:

1. Compliance with DRC Legislation and Methodological Standards

a. Outdated Methodology

The Tshopo Lomami Grouped REDD+ Project uses Verra's VM0015 methodology, which is being phased out in favour of VM0049 under the consolidated REDD+ rules. Projects relying on VM0015 must complete validation by March 19, 2025. Failure to do so would require re-submission under the updated methodology, posing a significant risk to the project's viability. Could you clarify whether you obtained the validation from Verra before the deadline of March 19?

No, we did not obtain validation from Verra before the deadline of March 19. The project applied the Verra-approved methodology (VM0015) that was in effect at the time the drafts currently available for public consultation on the Verra platform were prepared, in accordance with the applicable rules and procedures.

Any future updates to the methodology shall be made in line with Verra's evolving requirements. It is important to note that these documents are *draft* versions and do not reflect complete or up-to-date information on the project.

b. Inconsistencies in Project Area

The project documentation reports a total area of 930,000 hectares (October 2022 document version), but discrepancies exist in the figures presented in different documents, raising questions about the accuracy of the stated boundaries. Could you possibly clarify the exact location and surface of the project concessions?

The project area reported in the October 2022 version to which you are referring corresponds to preliminary documentation prepared for the purpose of project listing, initiating the validation process. As such, the figures and boundaries presented in the drafts currently available on the Verra platform are not final. These figures are subject to adjustment and technical refinement following the validation process conducted by the VVB and the review by the Standard. As indicated on the Standard's platform, the document is considered a draft.

c. Violations of the Forestry Code

Three of the four project proponents (GRIN, BIODEV, and RESO) are reportedly owned by the same individual, Blandon Blattner, belonging to the Blattner family who also owns other conservation concessions in the country, including SAFBOIS. The aggregation of these concessions may contravene Article 92 of the Forestry Code, which prohibits any person (whether moral or physical) to own more than 500,000 hectares of land (<https://www.leganet.cd/Legislation/Droit%20economique/Code%20Forestier/rdc-loiforets.pdf>). What is your position in this regard?

- They are not owned by Brandon Blattner; those companies are corporations that are held by multiple shareholders, not a single owner. The provision states that:
- *Sans préjudice des droits acquis, aucune personne ne peut bénéficier des concessions forestières dont la superficie totale dépasse cinq cent mille hectares, qu'il s'agisse d'une seule étendue ou d'étendues morcelées.*
- Furthermore, the project areas were allocated by the Congolese authorities, following the applicable legal procedures and in accordance with the requirements established by the DRC government for the implementation of such initiatives. The entities responsible for the project engaged with the Direction des Inventaires et Aménagement Forestiers (DIAF) to ensure full compliance with the DRC Forest Code. As part of the official land allocation process, DIAF decided to divide the areas into separate instances, in accordance with the legal framework. This structure was defined and approved by the competent governmental authority.

d. Conservation Concession Warning

Renewable Solutions (RESO), one of the project proponents, has been placed under formal notice by the Ministry of Environment and Sustainable Development (MEDD) for failing to comply with the 2011 Ministerial Decree on Conservation Concessions. The company has been given three months to rectify the situation or risk losing its concession. Could you provide us with an update on this situation?

- We are not aware of this.

2. Free, Prior, and Informed Consent (FPIC) Process:

It would appear from your communication that the process of obtaining CLIP with the communities involved has already been completed. Would it be possible to receive more details on the steps and methods taken to obtain this consent? In particular, we would like to understand how they complied with current Congolese legislation, including the national guidelines for REDD+ projects (<https://www.forestcarbonpartnership.org/sites/fcp/files/2015/March/Directives%20nationales%20sur%20le%20CLIP%20dans%20le%20cadre%20de%20la%20REDD%20%20RDC.pdf>) and the ministerial order 026/2017 setting the framework for national guidelines on FPIC in the context of REDD in the DRC (<https://www.leganet.cd/Legislation/JO/2018/JO.15.02.2018.pdf>)

The process of obtaining Free, Prior, and Informed Consent (FPIC) was conducted in accordance with the applicable legal and regulatory framework in the Democratic Republic of Congo. This includes Ministerial Order No. 026/CAB/MIN/EDD/AAN/KTT/04/2017, which establishes the national guidelines for FPIC in the context of

REDD+; Ministerial Decree No. 047/CAB/MIN/EDD/AAN/MML/05/2018, which sets out the approval procedure for REDD+ investments; the Procedure Manual for Mandatory National Certification of REDD+ Investments (2nd Edition, May 2017); and the Best Practice REDD+ Private Sector Project Implementation Framework for the DRC, developed by The Nature Conservancy. We, as project proponents, acted in full compliance with these directives.

3. Community peaceful demonstration

We have received reports of a peaceful protest occurred between January 31 and February 2, 2023, where community members gathered to express their grievances about the project, in coincidence with a ceremony to finalise the "*Cahier de Charges*" (specification agreement) which seemed to have been met with repression from security forces, including the Congolese army (FARDC) and police (PNC). Could you please provide your perspective on this event and on the steps and measures taken by the Tshopo Lomami Grouped project representatives to resolve this issue? Has a grievance mechanism been established to report any issue?

- The demonstration to which you refer did not relate to the Tshopo Lomami REDD+ project. It took place in a different area - within the territory of Isangi - and was directed against a company that has no connection whatsoever with the carbon project or the entities involved in its development. Our perspective, as you said, was that it was a peaceful demonstration, and there remains a total harmony between the project and the community members. Once the misunderstanding was identified, clarifications were provided to the individuals involved, explaining that the company targeted by the protest had no affiliation with the REDD+ project. After 3 days of peaceful protest they all signed the "*cahier de charges*" freely and willingly.
- Yes, a grievance mechanism has been established.

4. *Cahier de Charges* and community benefits

Could you clarify what has been built so far in accordance with the "*Cahier de Charges*" signed with the communities? Also, could you clarify whether a benefit sharing agreement has been included as part of the *cahier des charges*?

This question is premature; nothing has been built because we are still waiting for documents from the Minister of Environment before moving forward. The same goes for the benefit sharing agreement.

We would be very grateful for taking the time to provide any feedback or clarifications to the findings presented in this letter to allow us to take your reply into account in our research.

With best regards,

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

ANNEX 3: WWC RESPONSE

De : [REDACTED]
Envoyé : 13 July 2025

À : [REDACTED]

Objet : RE: Re: Requête d'information autour des projets REDD+ et concessions de conservation de l'entreprise WWC en RDC

Bonjour [REDACTED],

Vous voyez la courbe de la déforestation que nous avons pris en 2013 a plus de 5000 hectares pour la réduire a moins de 20000, avec des remontées lorsque l'investissement est faible.

[REDACTED],

Nous vous remercions sincèrement pour le temps que vous avez consacré à répondre de manière aussi détaillée à nos questions concernant les concessions forestières et les projets liés à Wildlife Works et ses filiales en RDC. Nous apprécions votre disponibilité et votre ouverture dans le cadre de cette recherche en cours et nous ferons de notre mieux pour intégrer votre récit par rapport aux observations et résultats contenus dans notre rapport préliminaire.

Nous souhaitons préciser tout d'abord que notre recherche ne se focalise pas uniquement sur vos projets, mais elle vise à analyser de façon plus large et globale la prolifération et l'impact des initiatives de crédits carbone à l'échelle nationale.

Notre objectif est d'évaluer les dynamiques actuelles en matière d'allocation des concessions, de conformité réglementaire, de transparence, ainsi que les effets concrets sur les communautés locales et les écosystèmes.

Nous savons qu'il y a eu attribution des concessions de conservation dans le pays, conversion des titres d'exploitation vers la conservation etc. Mais, comme scientifique, j'essaie toujours de peser mes mots. Parler de « prolifération », pendant qu'il n'y a pas 3 millions d'hectares mis dans la conservation sur 150 millions d'hectares total des forêts, est quand même assez fort. Pourtant, il y a près de 20 millions d'hectares de forêts légalement ou illégalement attribuées à certains concessionnaires, bien connus. Mais, vous savez également qu'aucune de ces concessions ne peut prétendre avoir un statut, dans le cadre du processus REDD. Bien plus, aucune d'entre elles n'est sur le chemin de la certification. Entre-temps, ceux et celles qui ont acquis des concessions d'exploitation illégalement continuent à dévaster la forêt sans que les ONG de conservation ne s'en émeuvent. Dans ce contexte, c'est comme disait Gandhi, « Ce qui me fait peur ce n'est pas la méchanceté des méchants mais le silence des justes ».

Compte tenu du rôle central joué par WWC et ses filiales dans la mise en œuvre des projets REDD+ en RDC, nous reconnaissons que notre descente au Mai Ndombe a été effectuée il y a plus de 10 mois et nous sommes heureux d'entendre les améliorations des infrastructures annoncées dans le cadre du projet REDD Mai Ndombe depuis notre dernière visite.

Dans ce sas, donc nous souhaiterions obtenir si possible des documents justificatifs ou soubassements concernant les réalisations en matière d'infrastructures et le fonctionnement du mécanisme de gestion des plaintes et de résolution des conflits, ou peut-être de toute évaluations ou audits indépendants attestant des résultats obtenus, idéalement d'ici la fin de cette semaine, afin de pouvoir les intégrer à vos réponses ?

Je vous informe que presque chaque acheteur envoi son auditeur avant la vente des crédits. Mais personne ne rend public son audit. Je ne peux donc pas vous les envoyer. Vous pouvez venir et je vais vous accompagner pour que vous puissiez voir nos réalisations de vos propres yeux. Vous verrez la fausseté des rapports qui vous sont transmis. Nous vous montrerons les dossiers des plaintes que nous recevons et la manière dont nous avons résolu chacune d'entre elles.

Aussi, nous comprenons qu'il s'agit de « work in progress » et que vous ne pouvez pas tout réaliser en même temps. Quand même, nous souhaiterions avoir aussi si possible des précisions sur les revenus liés à la vente de crédits carbone et leur répartition. Pourriez-vous donc confirmer ou nous indiquer où nous pouvons avoir des éléments concernant ;

- Le montant total généré par ces ventes ?
- Vous savez bien que le système de vente de crédits est transparent, de la génération des crédits auprès de Verra à la vente auprès du registre. Vous pouvez le voir !
- La distribution de ces revenus (part dédiée aux opérations, aux communautés locales, aux investissements dans les projets, aux taxes, etc.) ?
- Je ne crois pas que vous puissiez vouloir auditer nos comptes ! Les opérations sont financées par les fonds d'investissement du projet et auditées à la fin de l'année par la DGI qui certifie les coûts du projet. Vous pouvez faire un effort de recherche car, nous ne payons que la taxe de superficie et la taxe sur le bénéfice des subsidiaires locaux. Le reste est réglée par le partage de bénéfices avec les institutions de l'Etat qui ont reçu de bénéfices jamais payés par une société forestière depuis la FORESCOM. Etant couvert par la confidentialité, nous ne pouvons vous donner le montant précis. Puisque vous faites de recherche, vous pouvez vous approcher des administrations qui vont vous donner l'information. Aussi, les communautés locales reçoivent 25% des produits de vente. Pour les investissements, vous savez que nous recourons aux emprunts pour la mise en œuvre des projets avant même la certification. Vous comprenez que je ne peux vous dire ce que nous avons fait pour chaque projet, cela prend énormément de temps. C'est à la fin de l'année fiscale que nous le faisons lorsque tous les comptes sont clôturés. Pour l'instant, les résultats consolidés de l'audit ne sont pas encore disponibles.
- Les modalités de partage des bénéfices avec les communautés concernées, si de tels accords existent ?
- Vous avez le Cahier de Charge et le protocole d'accord. L'Etat n'accepte pas un partage monétaire de bénéfices. Le paiement aux chefs est défini dans le Cahier de Charge. Les fonds des communautés sont définis dans le Cahier de Charge. Ils sont gardés dans le Fonds Local de Développement qui y est défini.

Nous aimerions aussi avoir donc des clarifications sur la structure juridique des sociétés impliquées et sur leur conformité avec le Code forestier, par rapport aux autres concessions obtenues en 2023, en particulier :

- Des précisions sur la date d'enregistrement officielle de SORFA Congo ? Vous mentionnez des erreurs de datation au niveau du guichet unique, pourriez-vous nous confirmer la date exacte d'enregistrement, et nous transmettre un soubassement ?
- De la maison où je travaille actuellement, je ne peux pas vous donner la date de création du SORFA. Comme je vous ai dit précédemment, le compte bancaire avait déjà été ouvert et les fonds transférés au mois de février, si ma mémoire est correcte. Je ne fais aucun cas des élucubrations de alias Arnaud Labrousse. Je ne traite pas avec des anonymes.
- Toute information complémentaire sur la relation entre les sociétés et leur actionnariat, afin de mieux comprendre dans quelle mesure le contrôle effectif est exercé par Wildlife Works.
- Alias Arnaud Labrousse avait aussi parlé des actionnaires des trois sociétés à partir des informations obtenues au Journal Officiel. ERA-Congo et WWC ont chacun deux actionnaires tandis que SORFA en a trois.

Meilleures salutations

[Redacted signature block]

From: [REDACTED]
Sent: 08 July 2025
To: [REDACTED]
Subject: RE: Re: Requête d'information autour des projets REDD+ et concessions de conservation de l'entreprise WWC en RDC

Bonjour [REDACTED],

J'avais oublié de mettre un paragraphe-réponse en rouge. Je viens de mettre les écrits en vert pour montrer la différence. Il était initialement en noir.

Meilleures salutations,

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

From: [REDACTED]
Sent: Friday, July 4, 2025
To: [REDACTED]
Subject: Re: Requête d'information autour des projets REDD+ et concessions de conservation de l'entreprise WWC en RDC

Chere [REDACTED],

Je vous remercie pour votre message et surtout pour votre intérêt dans nos différents projets. Les voix discordantes respectueusement et objectivement exprimées contribuent à l'amélioration du travail humain qui ne peut en aucun cas être exempt d'écueils. C'est pourquoi, nous avons pris le temps de vous lire et de vous répondre point par point entre vos lignes en rouge.

1. Projet REDD+ de Mai Ndombe

Du 14 au 24 août 2024, une mission de documentation des activités du projet REDD Mai Ndombe s'est déroulée dans la province de Mai Ndombe. L'équipe de la mission a visité cinq villages, et s'est rendue plusieurs fois au bureau du WWC à Inongo, mais le directeur et son équipe n'ont pas voulu nous recevoir. Du 17 au 18 août 2024, les portes du bureau du CME ont été fermées.

De retour du terrain, l'équipe insiste à nouveau, mais sans succès. La mission a cependant organisé des discussions et des entretiens semi-structurés avec les habitants de et d'autres représentants de la société civile par le biais de réunions communautaires, de groupes de discussion avec des segments de la population tels que les femmes et d'entretiens individuels. Certaines informations ont été filmées et photographiées avec le consentement préalable des personnes concernées. Les informations recueillies sont résumées ci-dessous.

1. Village de Ntuku.

L'équipe de recherche a noté que, contrairement à ce qui s'était passé lors de notre précédent rapport REDD Minus[2], certaines infrastructures ont été construites, en particulier un bâtiment abritant l'école et un puits d'eau. L'équipe a discuté avec les membres de la communauté pour comprendre comment ils percevaient ce qui avait été réalisé et l'étendue de leur implication dans le travail.

1. L'éducation : Comme mentionné ci-dessus, un bâtiment scolaire avec 6 salles de classe a été construit et les enseignants sont encouragés par une prime mensuelle que WWC leur donne pour que l'enseignement soit gratuit, ainsi que des fournitures scolaires et des frais pour les examens d'État pour les finalistes. Cependant, le bâtiment n'est pas encore terminé, il n'y a pas de pavage, de plafonds, de bancs ou de bureau de gestion de l'école.

C'est ce qu'on appelle chez-vous: « Work in Progress »? Si "vos" équipes étaient à la hauteur de l'honnêteté, ils auraient pu vous dire que la fondation du bâtiment du bureau était terminée au moment de leur passage. Les élèves qui étudiaient sous les feuilles de rameaux n'ont pas attendu la finalisation des travaux pour se mettre dans le bâtiment, ce qui complique la finalisation de la construction à l'intérieure. Mais nous ne pouvons pas les blâmer pour cela. On attend les vacances pour avancer. Un peu de patience, nous allons terminer cette école (pavement, plafond, portes, bancs, etc.) comme les autres à Lokanga, Mbale, Ikita, Nsongo, Nselenge, Lobeke, Inunu, Mpili, Mbwe Nzey, etc. D'ailleurs pour votre information, la finalisation du bâtiment du bureau est pour bientôt. De même que le pavement, les plafonds, etc. Les portes et fenêtres sont déjà en place.

2. *Santé* : Le village de Ntuku n'a pas encore de centre de santé construit. Une infirmière a mis en place un centre de base où les patients dorment sur des bancs. De nombreux habitants des villages environnants dépendent de Ntuku ; leurs patients viennent s'y faire soigner et leurs enfants vont à l'école.

Le village de Ntuku n'a jamais eu d'infirmerie prévue par la Zone de Sante d'Inongo. Nous ne sommes pas une institution de planification de la Sante Publique. Nous ne décidons pas de la localisation des Centre de Santé, c'est le Ministère de la Santé qui a établi un réseau de dispensaires à travers les zones de santé. La Zone de Sante d'Inongo a prévu un Centre de Sante a Bobola Mpinga pour desservir Ntuku. Aussi, ni le Cahier de Charge, ni les Projets Locaux de Développement (PLD) soumis par la population n'ont prévu la construction d'un centre de santé à Ntuku. Si la Zone de Santé avait prévu ce dispensaire, nous l'aurions construit ou prévu la construction. Les patients seront dirigés vers Bobola Mpinga ou les travaux pourront commencer dans les mois qui viennent.

3. *Forage d'eau* : un forage avec une fontaine d'eau qui ne fonctionne qu'avec des piles. Pendant la mission, les deux batteries sont tombées en panne et nous avons dû attendre que les techniciens du WWC les réparent ou les changent. La communauté a demandé un forage manuel plutôt qu'un forage à piles car les piles ne fonctionnent pas et il n'y a pas de mesures alternatives.

Nous n'avons aucun forage qui fonctionne avec des piles, que je sache. Nos forages fonctionnent à l'énergie solaire. Actuellement, tous les forages sont fonctionnels, y compris à Ntuku et à Bobola Mpinga. Notre société dispose suffisamment de produits de maintenance pour tous les forages. Plusieurs de nos forages fonctionnent depuis plus de 3 ans sans trop de problèmes. La preuve est qu'aujourd'hui, une année après votre passage, le forage de Ntuku fonctionne encore parfaitement. Le changement des convertisseurs et de batteries n'est qu'un processus normal qui est pris en compte dans la maintenance. Le forage manuel installé par Rain Forest à Ibali n'a fonctionné que pendant quelques semaines et ne garantissait pas la qualité de l'eau, n'ayant pas atteint une nappe de profondeur supérieure à 15 mètres. On ne suit pas l'exemple de ce qui ne marche pas.

Jusqu'à présent, aucun emploi permanent n'a été créé dans le village de Ntuku et aucun mécanisme de gestion des plaintes n'a été mis en place dans le village.

Aucune société privée ni même une ONG peut garantir des emplois permanents dans chaque village. Nous avons 599 employés dans l'ensemble de la concession dont plusieurs originaires de Ntuku et Bobola Mpinga travaillent à Loombe dans les étangs, les cultures pérennes et l'intensification agricole. Notre stratégie pour l'amélioration du vécu quotidien des communautés locales est centrée actuellement sur une augmentation de la productivité agricole. C'est de cette manière que les mamans des organisations de base de Ntuku ont eu cette année une production record de manioc, prête à être vendue sur le marché.

Nous avons actuellement le meilleur mécanisme de plainte et recours avec plusieurs rideaux. 1. Par les CLD's : Nous recevons chaque jour les plaintes qui nous sont transmises par les CLD's à partir de tous les villages. 2. Avec le Téléphone ouvert, (y compris le mien) les responsables de la société et des ONG participant à ce mécanisme sont contactés à tout moment. A Bobola Mpinga, plusieurs conflits d'utilisation de terre ont été résolus à l'amiable. 3. Les mécanismes prévus par le Ministère. Depuis le début de nos activités, il y a eu énormément de plaintes et de conflits dans la zone du projet, lesquelles ont été résolues habilement par les responsables de ce projet et des médiateurs, les CLD's et les responsables des communautés ; dans l'étonnement de vos partenaires dont l'un m'a posé la question de savoir comment avons-nous pu régler le conflit entre Ilee et Mankaba par exemple. Ce qui n'a pas marché, c'est la boîte à suggestion, à cause du niveau d'instruction de la population dont la majorité est non instruite. Les lettres collectives et les appels téléphoniques sont très appropriés et efficaces.

2. Village de Bobolampinga

a. *L'éducation* : Un bâtiment scolaire a été construit avec des bancs et des portes, mais il est encore incomplet car il n'y a pas de bureau de gestion, pas de latrines scolaires et pas de plafonds. WWC soutient les enseignants avec une prime mensuelle, mais ce paiement est effectué de manière irrégulière, avec des retards pouvant aller jusqu'à 3 mois.

C'est ce qu'on appelle chez-vous « Work in Progress » n'est-ce pas ? Ici, il n'y a pas encore de de plafond, mais il y a déjà des bancs et des portes. Et si vous passez par là aujourd'hui, vous verrez que le bureau est déjà construit et que les plafonds sont déjà placés. Encore une fois, l'honnêteté aurait pu reconnaître que la fondation du bureau était déjà achevée au moment du passage de vos collègues.

Plus de 1200 enseignants sont sur notre liste de paie pour un cout total mensuel de 200.000 dollars US. Nous payons les salaires chaque mois sauf pendant les vacances car l'objectif est de soulager la souffrance des enseignants, agents de l'Etat non payés et non mécanisés. Nous ne pouvons pas nous substituer à la Fonction Publique pour payer des enseignements pendant qu'ils sont en vacances. Si c'est cela qu'ils appellent retard, ces derniers ne seront jamais rattrapés. Par ailleurs, ils auraient également pu vous dire que la rémunération en question vaut entre 1.5 ou 2 fois celle de leurs collègues rémunérés par l'Etat dépendamment du taux de change. Logiquement, nous ne rémunérons pas les enseignants au mois d'août lorsque « vos équipes étaient sur le terrain ».

b. *Santé* : Le centre de santé de Bobolampinga n'a pas encore été construit ni équipé. Les patients locaux y sont soignés dans des conditions encore précaires. On note cependant que le CME a pris en charge des opérations chirurgicales et quelques cas d'enterrement.

Nous ne pouvons pas construire tout et partout au même moment. Il viendra un moment où le Centre de Sante de Bobo Lampinga sera construit. C'est dans la programmation du Grand CLD après la construction de l'Hôpital de Lokanga en cours et de celui de Mbale. Néanmoins, nous avons pris en charge TOUS les enterrement (et pas quelques enterrements comme vous le prétendez) dans la zone du projet et tous les malades qui sont présentés par les CLD's sont pris en charge à Ibali, Inongo, Lokanga, Mbale, Lobeke, Vanga et même Kinshasa. Ce ne sont pas quelques cas des enterrements mais plutôt TOUS LES CAS DES ENTERREMENTS.

4. *Accès aux ressources* : L'équipe a été informée que des activités telles que la pêche et la chasse sont autorisées, mais que couper du bois, même pour fabriquer des portes ou des cercueils, est interdit et peut conduire à des amendes ou même à l'arrestation. L'équipe a observé plusieurs habitations sans portes ou avec des portes en bambou.

Pouvons-nous dire ici que Rainforest UK encourage la déforestation ? Pour notre part, nous savons en tant que forestiers que les communautés locales ne manquent pas de bois de construction pour les portes et les fenêtres dans les zones réservées à leurs activités communautaires (Article 38-39 du Code Forestier), dès lors que nous prenons en charge TOUS les cercueils. C'est pour cela que nous avons défini la zone de comptabilité du projet (PAA) en exclusion de la zone communautaire généralement localisée près des villages et ce, en accord avec le Code Forestier. Par ailleurs, nous ne nous sommes jamais substitués à l'Etat et ne prélevons aucune amende auprès de ceux qui coupent les bois. Nous portons plainte contre les exploitants commerciaux artisanaux qui coupent les bois dans la zone PAA pour la vente d'ailleurs, en dehors de notre zone de projet. Nous ne pouvons pas prendre la responsabilité d'offrir des portes et des fenêtres aux membres de la communauté qui ont encore des portes et fenêtres en bambou. Jusque-là, aucun des CLD's ne nous a proposé une telle activité dans leurs Plans Locaux de Développement.

5. *Activités agricoles et autres* : un jardin expérimental qui existait en 2019 a été détruit et rien n'a été fait depuis. Aucun emploi permanent pour les membres de la communauté de Bobolampinga n'a été signalé. Les revenus coutumiers sont versés au chef coutumier de Mbale.

Nous n'avons jamais eu un jardin de démonstration de 2m X 2m à Bobola Mpinga ni construit une école en paille comme avait prétendu votre rapport antérieur. La preuve est que dans votre présent rapport, vous reconnaissez que nous n'avons pas d'employés à Bobola Mpinga. En général, ce sont nos employés communément appelés « agronomes locaux » qui mettent en place les jardins de démonstration sous la supervision des Ingénieurs Agronomes. Comme nous n'avons jamais eu d'agronomes locaux à Bobola Mpinga, nous ne pouvions donc pas mettre en place un jardin de démonstration. C'est une pure et simple invention de vos équipes. Ce que nous

avons fait à Ntuku, c'est le soutien à l'Organisations de Base (OB) qui a mis en place des champs de manioc pour servir de Parc à bois pour de boutures qui vont être diffusés ensuite à Bobola Mpinga et ailleurs. Je vous invite de venir voir la production de manioc à Ntuku.

3. Village de Loombe

Lors de la visite de l'équipe de la mission dans ce village, il a été noté qu'une école avait été construite et qu'un étang à poissons avait été créé avec le soutien du CME. Des latrines modernes ont également été construites, mais les personnes interrogées ont déclaré qu'elles n'étaient réservées qu'aux invités de marque.

Nous n'avons pas construit un étang mais plutôt plusieurs étangs qui produisent du poisson local (clarias, etc.). Pour l'école qui n'aurait pas de latrines, j'espère que vous avez également vérifié que dans les écoles de Kinshasa et d'ailleurs, il existe des latrines modernes. Pour ce qui nous concerne, nous avons programmé la construction des latrines dans notre prochaine liste. C'est aussi « work in progress ». Les latrines qu'on a trouvées à Loombe sont localisées à presque 1 kilomètre de l'école, dans notre site de campement. Pensez-vous qu'ils ont été construites pour l'école ? Si vous êtes allé à Mbale, vous alliez expérimenter une école déjà finalisée avec des latrines. Pour les autres établissements, la construction des latrines est programmée pour les prochains mois.

4. Village d'Ibali

a. *Secteur de la santé* : La mission a noté qu'un hôpital équipé a été construit et que les membres de la communauté y reçoivent des soins gratuits. L'équipe de recherche a apprécié l'évolution de ces réalisations depuis la publication de REDD Minus. Cependant, l'équipe de recherche s'est vue refuser l'accès à l'hôpital, ce qui l'a empêchée de s'entretenir avec les patients.

Un adage Ntomba dit ceci : « Chez autrui, il faut vivre avec autrui ». Les Ekonda disent également : « Dans un village étranger, il faut vivre comme une poule et non comme un coq » car un coq, même étranger, réveille le village aux petits matins lorsqu'ils ont besoin de sommeil. « Si vous arrivez devant la porte de la maison d'autrui, vous devez apprendre à frapper » disent également les Bolia. La propension de votre institution à vouloir forcer les portes d'autrui, est un mépris inacceptable que vous avez notamment expérimenté à Kesenge . C'est ce qui explique le refus de vous faire accéder à nos installations. Personnellement, je ne peux pas me présenter dans un hôpital que vous avez construit et demander l'accès pour m'entretenir avec des malades sans votre autorisation ni celle du Médecin Directeur. Je ne pense pas qu'un seul hôpital de la Grande Bretagne puisse permettre cela.

b. *L'éducation* : Ibali dispose d'une école primaire construite par la société forestière qui opérait dans la région, et le WWC apporte son soutien en prenant en charge les enseignants et en distribuant des fournitures scolaires. Le cahier des charges prévoyait la construction d'une école secondaire, mais rien n'a encore été fait. A la demande du WWC, la communauté a collecté des matériaux de construction tels que du sable et des briques, mais attend toujours leur livraison.

La construction de l'école d'Ibali est prévue dans le Cahier de Charge. Néanmoins, le Chef du village, en accord avec les membres de la communauté, a demandé la construction de l'hôpital avant la construction de l'école. Comme nous ne pouvons pas tout construire au même moment, la population d'Ibali attend patiemment son tour pour l'école . **Par ailleurs, prétendre que la population d'Ibali a collecté des matériaux de construction pour l'école, est une autre fausseté. Nous ne nous souvenons pas non plus avoir demandé à la population de collecter de matériaux pour l'école.**

c. *Redevances coutumières* : Les Ibali ont demandé une augmentation des redevances pour leurs bénéficiaires coutumiers. Selon les informations reçues, WWC paie 1 000 000 fc (l'équivalent de 357 USD) par an pour l'ensemble de la communauté. La répartition de cette somme est cependant jugée insuffisante pour la communauté et provoque des divisions entre les habitants.

Le village d'Ibali ne reçoit pas l'équivalent de 357 dollars. Ce sont les forêts d'Ibali, Mpata Mbalu et Ngha gérés par le Chef d'Ibali qui sont rémunérées à hauteur de six mille dollars l'an dont 3000 dollars pour chacun des deux clans princiers. De plus, un autre clan d'Ibali (Clan Mbale) reçoit 1000 dollars annuellement. Votre réclame est donc fausse.

d. *Emplois permanents* : Au moins 6 personnes d'Ibali sont employées par WWC de manière permanente.

A Ibali, nous avons 3 animateurs locaux, 3 agronomes locaux, 11 infirmiers, deux médecins et une dizaine d'enseignants pris en charge. Cela contribue tant soit peu au rayonnement de l'économie locale.

e. *Un forage alimenté par batterie est également installé, avec les mêmes difficultés que les autres forages mentionnés ci-dessus.*

Notre forage d'Ibali a fonctionné sans arrêt depuis son installation soit à l'énergie solaire ou avec le groupe électrogène de l'hôpital. C'est plutôt le forage manuel installé par Rain Forest ou un de ses supplétifs qui n'a fonctionné que pendant quelques semaines. Il fallait que les enquêteurs puissent vous le faire savoir. Comme dit plus haut, nous ne pouvons pas suivre l'exemple de ce qui ne marche pas.

6. *Gouvernance* : les habitants ont exprimé leur frustration croissante face au manque de responsabilité des CLD (Comités Locaux de Développement) dont le mandat a expiré et qui sont perçus par certains comme une structure imposée de l'extérieur ne représentant pas les intérêts des communautés. Les habitants ont déploré de ne pas être suffisamment informés ou consultés sur les réunions des CLD avec l'entreprise.

Le CLD, n'est pas le fait de notre société. Ses membres ont été élus par la communauté elle-même. Les membres tiennent des réunions dans les villages en notre absence et prennent des décisions telles que la prise en charge des salaires des enseignants et des infirmiers, l'élaboration des PLD's qui nous sont transmis. Nous n'avons que quelques séances de concertation et des réunions en rapport avec la résolution des conflits et l'analyse de l'opérationnalisation des PLD's, les rapports d'avancement des travaux, etc. Il revient donc aux membres de respecter les textes légaux qui ont présidé à la création de ces CLD's. En ce qui concerne le renouvellement des mandats, nous avons notamment été informé des changements des équipes de direction dans plusieurs CLD's dont ceux de Lokanga et Lobeke.

5. *Rapports d'autres villages* : nous avons reçu plusieurs rapports de non-conformité de la part d'ONG locales opérant dans la région. Ceux-ci concernent, entre autres, l'absence des infrastructures communautaires promises dans les communautés de Mekiri, Ntumbe, Kutu Moke et Epoko Fonga, les restrictions d'accès à la forêt à Lobalu pour faire place à une brigade de protection des Bonobos, et le non-paiement des redevances coutumières.

Nous comprenons le fait que tout le monde veuille que nous puissions construire la prochaine école dans son village. Néanmoins, nous ne pouvons pas le faire sur le plan opérationnel et personne d'ailleurs ne peut le faire. Voici les villages qui attendent encore les constructions : Ngeleko, Bakele, Mpongo Boli, Mekiri, Kutu Muke, Epokofunga, Bopambo. Ils attendent patiemment leurs tours. C'est aujourd'hui le tour de Ntumbe, Iyanza, Ngongo, Bosando, Kundo, Wania, Lobalu, Bamboka, à côté de 25 autres bâtiments qui sont finalisés ou presque finalisés. C'est un record dans l'industrie. C'est véritablement un plus dans la REDD.

En ce qui concerne les restrictions d'accès à la forêt à Lobalu, ce n'est qu'une pure et simple invention. Notre société n'a d'écogardes que la population elle-même. D'ailleurs, « le sanctuaire » des bonobos n'est pas dans la forêt de Lobalu pour que celle-ci puisse avoir des restrictions d'accès.

Mécanisme de gestion de plaintes

Ce mécanisme n'existe toujours pas dans toutes les communautés visitées, personne n'a jamais entendu parler d'un mécanisme indépendant et impartial de gestion des plaintes dans la concession. Une ONG a récemment été engagée comme consultant pour élaborer un document relatif à un mécanisme de gestion des plaintes, mais il semble que ce document soit encore dans une phase préliminaire et qu'il ne soit pas encore disponible pour les communautés.

Nous avons bel et bien dit que les mécanismes de plainte et recours existent. Nous avons effectivement commissionné un travail auprès d'un consultant dans le but d'améliorer le système de gestion de plaintes et recours. Le travail est en cours. Néanmoins, il est important de souligner que vos équipes ont visité trois villages qui se suivent et qui ne peuvent donc pas être représentatifs de la concession.

2. Concessions d'ERA Congo et de SORFA dans les provinces de la Tshopo, de l'Équateur, du Sud-Ubangi et du Nord-Ubangi

En plus de Mai Ndombe, les filiales de WWC ont obtenu quatre autres concessions le 4 mars 2023 selon les informations officielles disponibles dans le Journal Officiel de la RDC, qui sont énumérées ci-dessous. Deux autres concessions auraient été attribuées dans le Sud-Ubangi, bien qu'aucun numéro de contrat ne soit disponible.

- 001/23, 282 295 hectares, Localisation : Yamandundu et Wahanga, Basoko (province de la Tshopo)
- 002/23, 188 835 hectares, Localisation : Waka-Bokeka, Basankusu (province de l'Équateur)
- 003/23, 299 995 hectares, Localisation : Businga (province du Nord Ubangi)
- 004/23, 282 295 hectares, Localisation : Wahanga et Yamandundu, Basoko (province de la Tshopo)
 - 568 630 hectares, Localisation : Kungu et Budjala (province du Sud Ubangi) - pas de numéro disponible

Je ne crois pas que vous puissiez avoir tiré les éléments ci-dessus des informations officielles du Journal Officiel comme vous le prétendez et ce, pour de raisons ci-après :

1. Les concessions 001/23 et 004/23 ont la même superficie et la même localisation. Il doit probablement s'agir d'une seule et même concession ou alors d'une erreur. « Les filiales » de WWC n'ont pas deux concessions dans la province de la Tshopo.
2. Aucune filiale de WWC ne dispose d'une concession dans le Sud Ubangi, que ce soit à Kungu ou à Budjala.

Vos informations ont probablement été obtenues auprès du fameux « pseudo nommé Arnaud Labrousse » en réalité fonctionnaire de l'Agence Française de Développement.

Nos recherches ont permis d'identifier plusieurs problèmes dans le processus d'attribution de ces autres concessions :

Les problèmes que vous soulevez à partir de « vos recherches » ont été en réalité soulevé par ce personnage obscur sous pseudonyme et repris notamment par Green Peace il y a quelques temps. Les clarifications ont été faites par les journalistes locaux à la suite d'une conférence de presse de la Société Civile Environnementale du Congo (GTCRR) qui avait accompagné le processus. Quelques liens vers ces publications vous sont présentés ci-contre.

<https://lequotidienrdc.com/greenpeace-un-concurrent-masque-et-de-mauvaise-foi/>

https://www.mediacongo.net/article-actualite-135946_rdc_foret_le_bicephalisme_de_greenpeace_afrique_devoile_richard_bondembe_analyste.html

<https://www.opinion-info.cd/societe/2024/04/14/bassin-du-congo-lacharnement-injustifie-de-green-peace-contre-la-ministre-detat>

<https://congoprofond.net/forets-du-congo-lacharnement-deloyal-et-scandaleux-de-greenpeace-mis-a-nu111/>

- Les concessions de WWC dépassent la limite légale fixée par le Code Forestier (article 92) puisque l'ensemble de leur surface couvre plus d'un million d'hectares alors que la législation stipule qu'aucune personne physique ou morale ne peut posséder plus de 500 000 hectares de terres

Comme dit précédemment, vous devez d'abord revoir votre liste des concessions de « WWC » pour rétablir la vérité sur ce sujet.

Par ailleurs, l'Article 82 du Code Forestier sur base de laquelle vous vous referez dans votre question suivante, ne reconnaît pas le droit d'acquérir une concession forestière à une entreprise étrangère puisqu'elle stipule in extenso que :

« Toute personne désirant obtenir une concession forestière en République Démocratique du Congo doit remplir les conditions suivantes : 1. Être domiciliée en République Démocratique du Congo pour les personnes physiques ou être constituée pour une personne morale, en vertu de la Loi et être domiciliée en République Démocratique du Congo ».

Wildlife Works Carbon LLC de droit américain dont vous faites allusion, n'est pas une entité légale en République Démocratique du Congo puisqu'elle n'est pas constituée en vertu des lois de la République Démocratique du Congo. Elle n'a donc aucune concession forestière en RDC. WWC-Congo, SORFA Congo et ERA-Congo dans lesquelles WWC LLC est actionnaire majoritaire sont chacune titulaires de moins de 500.000 hectares de concession. Ces trois entités de droit congolais (constituées en vertu des Lois de la RDC) sont très distinctes puisque constituées des actionnaires différents même si WWC reste l'actionnaire majoritaire. C'est comme qui dirait : KLM, Air France et Kenya Airways sont toutes une seule et même société, en vertu de l'actionnariat majoritaire commun. Même chez-vous en Grande Bretagne, je ne pense pas que WWC est une entité qui peut transactionner et acquérir des droits d'exploitation.

- Les contrats ont exempté WWC du paiement du dépôt de garantie exigé des concessionnaires par le code forestier sans fournir aucune justification

La justification est fournie par la Loi elle-même. C'est pourquoi je doute que vous ayez effectué des recherches. Nous devons savoir correctement interpréter la Loi qui stipule dans son article 82 alinéa 2 que **« l'exploitant est tenu de déposer un cautionnement auprès d'une institution financière établie en République Démocratique du Congo, en vue de garantir le paiement de toutes indemnités si les travaux sont de nature à causer un dommage ou s'il est à craindre que ses ressources ne soient pas suffisantes pour faire face à sa responsabilité »**. Le « Si » est important dans l'interprétation de la loi.

Ainsi, comme l'a si bien dit le Quotidien RDC, la bonne compréhension de la Loi est celle-ci en ce qui concerne le cautionnement : **« si les travaux [de l'exploitant] sont de nature à causer un dommage ou s'il est à craindre que ses ressources ne soient pas suffisantes pour faire face à sa responsabilité, l'exploitant est tenu de déposer un cautionnement auprès d'une institution financière établie en République Démocratique du Congo, en vue de garantir le paiement de toutes indemnités »**. Le but du cautionnement est donc de garantir le paiement des indemnités pour les sociétés susceptibles de causer des dommages au tiers ou pour des sociétés ne disposant pas de moyens suffisants pour faire face à leurs responsabilités ». Or, au moment de la signature des contrats, chacune des entreprises dont je viens d'énumérer avait 200.000 USD en compte dans une banque de la RDC comme preuve des ressources suffisantes pour faire face à leurs responsabilités, étant entendu que les concessions de conservation ne sont pas susceptibles de causer des dommages au tiers. Ceci permet également de balayer du revers de la main, la réclame selon laquelle SORFA aurait été constituée après la signature du contrat de concession puisque ce dernier ne pouvait pas avoir un compte bancaire avant son existence légale.

- Le contrat de l'une des concessions (Businga) n'a jamais été officiellement publié au Journal officiel.

Si cela était le cas, ou avez-vous trouvé des informations la concernant ? La responsabilité de chaque société est de se conformer à la réglementation, en déposant ses documents au Journal Officiel et en payant les frais de dépôt et de publication. Il ne nous revient pas d'imposer la publication. Pour notre part, tout a été déposé et payé en bonne et due forme. Il revient au Journal Officiel de publier. Nous prenons cependant acte de votre remarque et allons contacter le Journal Officiel pour nous enquérir de la situation.

- Les contrats de la filiale SORFA de WWC ont été signés deux semaines avant l'enregistrement légal de l'entreprise, le 16 mars 2023, selon le statut de SORFA et les documents officiels obtenus auprès du registre des entreprises de la RDC.

Ceci est absolument faux, les journalistes ont pu vérifier la fausseté des allégations de « alias » Arnaud Labrousse. SORFA Congo, à l'instar des autres filiales, ne pouvait pas ouvrir un compte bancaire et présenter à la commission, avant sa formation. Nous savons cependant contacté le Guichet Unique qui a reconnu des erreurs de datation dans l'enregistrement du document avec plusieurs dates différentes dans un même document. Comme je viens de le dire, la preuve est que les comptes bancaires avaient été ouverts avant la signature des contrats et les fonds transférés.

- Il semble que le WWC cofinancera la construction du bâtiment du Programme National de Surveillance des Forêts du MEDD[3] suite à l'attribution de ces quatre concessions de conservation. Pourriez-vous confirmer cette information et connaître le montant de sa contribution dans ce cas ?

C'est une allégation contenue dans des courriers envoyés par alias Arnaud Labrousse auprès de certaines universités aux Etats Unis. **Pour votre information, il s'agit d'une donation conjointe de notre société et du Ministère de l'Environnement (qui co-finance avec nous) un ouvrage appartenant à l'Université de Kinshasa et non au Ministère de l'Environnement.** Cet ouvrage sera constitué d'une batterie de laboratoires d'analyse spatiale pour la surveillance de l'environnement à l'instar des labs de l'INPE, de l'UCL, de l'UMD, etc. Vous ferez œuvre utile de ne pas sous-traiter vos « recherches » à un anonyme du WEB.

- Aussi, Pourriez-vous confirmer si l'Institut Congolais pour la Conservation de la Nature (ICCN) a donné son feu vert à ces concessions, comme l'exige l'arrêté ministériel de 2011 sur l'attribution des concessions forestières ?

Madame, nous vous recommandons de vous rapprocher de votre Conseiller Juridique pour une meilleure interprétation du texte. **Le Décret n° 011/27 du 20 mai 2011 fixant les règles spécifiques d'attribution des concessions forestières de conservation ne prévoit nulle part que l'ICCN puisse donner un feu vert avant l'attribution d'une concession forestière de conservation !**

Consentement libre, préalable et éclairé (CLIP)

- Serait-il possible d'obtenir plus de détails sur les étapes et les méthodes utilisées pour obtenir le CLIP (consentement libre, informé et préalable) des communautés vivant dans ces concessions nouvellement attribuées à WWC ? En particulier, nous aimerions comprendre comment ils se sont conformés à la législation congolaise actuelle, y compris les lignes directrices nationales pour les projets REDD+[4] et l'arrêté ministériel 026/2017 fixant le cadre des lignes directrices nationales sur le CLIP dans le contexte de la REDD en RDC.[5]

Même si nous avons obtenu la signature du contrat qu'en 2023, nous avons en réalité commencé le travail en 2021 avec l'identification et la délimitation de la zone d'étude et les contacts avec les populations locales. A cette occasion, nous avons pu identifier et délimiter grossièrement les terroirs pour chacun des villages dans la zone de travail. Ceci était d'autant plus évident que le travail a été fait de village en village et ce, dans chaque village de la concession. Toujours à cette occasion, les villageois ont été informés de notre intention de mettre en œuvre un projet de conservation forestière et que ce projet devait être rémunéré en utilisant le mécanisme REDD+ qui a également été expliqué aux membres de la communauté locale. Pour votre information par exemple, les limites proposées initialement pour la concession de Businga ont été modifiées à la demande des membres de la communauté qui ont reconnu l'existence d'une réserve provinciale vers le nord. Les communautés ont à cet effet donné leur accord verbal pour la réalisation du projet.

Nous avons ensuite travaillé avec les Chefs de Groupements pour valider les noms des chefs de terre qui sont les représentants des villages sous leur administration. Il s'en est suivi des réunions publiques au niveau de chaque village pour parvenir à la reconnaissance publique des représentants de ces villages par la population. Des réunions publiques au niveau des groupements ont ensuite été organisées avec les représentants des villages pour valider les limites entre les voisins. A ce stade, une cartographie participative n'a pas été organisée, étant donné que notre société ne disposait pas encore des droits légaux sur la concession. Ce travail devait être réalisée plus tard, lors de la signature du Cahier de charge, juste avant la grande réunion de signature organisée dans chaque chef-lieu du territoire.

Une étude socio-économique a ensuite été commissionnée dans chaque zone de projet ainsi qu'une étude d'impact environnementale qui sera sanctionnée par un Certificat délivré par l'Agence Congolaise de l'Environnement pour chacune des concessions. L'étude socio-économique (qui devait également appuyer les offres techniques et financiers) ayant révélée la solidité du système de tenure de terre et surtout l'absence des conflits sur l'utilisation des terres, nous avons procédé à des réunions publiques en vue de la signature du document de consentement village par village, lequel document a été rédigée en Lingala, langue qu'on pratique dans toutes nos nouvelles concessions. Des réunions de validation ont été finalement organisées au niveau de chaque groupement, au cours desquelles, nous avons discuté de la mise en place des mécanismes de plainte, recours et résolution des conflits. A cet effet, le projet Businga était pédagogique, du fait qu'il a nécessité d'actionner ce mécanisme avant même la signature du contrat de concession forestière, du fait de la nature hétéroclites des communautés vivant dans cette zone (cinq différents groupes tribaux).

En l'absence des avocats conseils et des ONG locales, tous les documents ont été signés en présence des représentants de GTCRR, Organisation Non Gouvernementale représentant la Société Civile Environnementale. C'est pour cette raison qu'elle avait réagi lorsque Green Peace avait repris à son compte, les allégations de alias Arnaud Labrousse. Ces documents signés par village et par groupement avec l'accompagnement de GTCRR sont disponibles pour consultation.

Vous pouvez vérifier mon récit et le conformer ou non cadre de directives Nationales sur le Consentement Libre Informé Préalable que je n'ai pas relu depuis longtemps.

[REDACTED],

J'ai pris la peine de vous répondre ligne par lignes sur base de votre promesse de publier intégralement notre récit par rapport aux allégations contenues dans votre rapport préliminaire. J'espère que vous êtes d'honneur et respecterez votre promesse écrite.

Meilleures salutations,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



The Rainforest Foundation UK

Suite 201, Pill Box Studios, 115 Coventry
Rd, London E2 6GG, United Kingdom

Tel: +44 (0) 20 7485 0193

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