

UC Berkeley Carbon Trading Project

Sent to the Supervisory Body via email to A6.4mechanism-info@unfccc.int

13 May 2026

RE: [SBM021 - annotated agenda and related annexes](#), item *A6.4-SBM021-AA-A03 - Draft tool: Article 6.4 sustainable development tool*

Dear Article 6.4 Supervisory Body,

I and three colleagues at the University of California, Berkeley and University of California, Irvine are submitting comments on the proposed update to the Article 6.4 Sustainable Development Tool, version 02.0. In these comments, we draw heavily on our team's experience with stakeholder consultations for mangrove restoration projects in Mexico, Madagascar, and Nigeria.

These comments summarize a longer study on Article 6.4 safeguard policies, which we will release at the following website: <https://gspp.berkeley.edu/berkeley-carbon-trading-project/publications#policy-briefs>

Herein, we include a summary of our study findings and specific recommendations for updating the Article 6.4 Sustainable Development Tool.

Many of the recommendations we provide can be easily adopted. Specifically, many of the sub-criteria we recommend for the Tool's 11 overarching safeguard principles can be added to the [A6.4 Environmental and social safeguards risk assessment form](#) and the associated verifier (DOE) requirements. Several of our recommendations, and some of the most important ones, would require more significant changes to the structure of the Tool and the safeguard section of the UN PACM Standard.

The tool represents an important step forward in safeguard policy. Our objective is to strengthen the tool and enhance its effectiveness, ensuring that it is practical, accessible, and usable for all actors anticipating its implementation.

We would welcome the chance to discuss these recommendations and are happy to answer any questions

Most sincerely,

Barbara Haya, PhD, Director, Berkeley Carbon Trading Project, Senior Researcher, Center for Environmental Public Policy, Goldman School of Public Policy, University of California, Berkeley, USA, bhaya@berkeley.edu

Pamela Castell de Oro, Researcher, Berkeley Carbon Trading Project, Goldman School of Public Policy, University of California, Berkeley, USA

Ann Le, PhD Candidate, School of Social Ecology, University of California, Irvine, USA

Ando Rabearisoa, PhD, Postdoctoral Scholar, Berkeley Carbon Trading Project, Goldman School of Public Policy, University of California, Berkeley, US

Public Comments: Aligning Paris Agreement Crediting Mechanism Safeguard Policies with Best-practice Social Safeguards for Land-use Projects

Pamela Castell,¹ Ann Le,² Ando Rabearisoa,¹ and Barbara K Haya¹

¹ *Berkeley Carbon Trading Project, Goldman School of Public Policy, University of California, Berkeley, USA*

² *School of Social Ecology, University of California, Irvine, USA*

Summary - Analysis of A6.4 Sustainable Development Tool

Land-use and forestry activities carry inherent risk for the communities living within and around conservation project areas. Conservation projects, including those participating in carbon markets, commonly restrict access to ecosystems that support local livelihoods through fishing, fuelwood, and food production. Those restrictions disproportionately affect the most vulnerable populations,¹ while benefits and alternative livelihood programs often do not materialize as promised.² The most harmful projects have resulted in involuntary resettlement, forced evictions, and violations of Indigenous Peoples' rights.³ The right to free, prior, and informed consent (FPIC)—a legally binding obligation under the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and International Labour Organization Convention 169—is meant to mitigate some of these risks, yet it continues to be violated across jurisdictions actively engaged in conservation and carbon projects, including in Guatemala,⁴ Brazil,⁵ Colombia,⁶ and Mexico.⁷

Safeguard standards meant to prevent such outcomes have been difficult to enforce, evidenced by five decades of institutional safeguard policies that commonly fail to protect people.⁸ Safeguard policies typically include criteria and principles that all projects must meet, stakeholder engagement requirements, third-party verification of compliance, and grievance mechanisms that stakeholders can use when obligations are not met. Safeguard standards have failed largely because project developers and verifiers both have incentives to move projects forward, while the subjective nature of safeguard compliance makes it easy for conflicted parties to take and accept superficial actions

¹ Duker et al., 2019; Griffiths, 2008; Kansanga & Luginaah, 2019; Mutabazi et al., 2014; Poudel et al., 2015; Ratsimbazafy et al., 2011; Satyal et al., 2020; To et al., 2017

² Poudyal et al., 2016, 2018

³ Cavanagh & Benjaminsen, 2014; Counsell, 2023; Lachnitt et al., 2023; Luttrell et al. 2014; Marshall, 2023; Redvers et al., 2025; Sarmiento Barletti & Larson, 2017; Vanclay, 2017

⁴ Inter-American Commission on Human Rights, 2022

⁵ International Labour Office, 2019

⁶ Inter-American Commission on Human Rights, 2025

⁷ Due Process of Law Foundation , 2017

⁸ Rich, 1994; Wade, 1997, Haya et al., 2023, Larson et al., 2013, Obergassel et al., 2017

without real safeguard compliance. In carbon markets, including the Paris Agreement Crediting Mechanism, activity participants⁹ (referred to throughout this brief as project developers) who benefit financially from selling carbon credits are responsible for carrying out safeguard requirements. Meanwhile, third-party verifiers (called designated operational entities, or DOEs, under Article 6.4), the main enforcers of safeguard policy compliance, are directly hired by the project developers and thus have incentives to accept developer safeguard claims so they can be hired again. Subjectivity and the need for deep knowledge of the local context to assess compliance have resulted in safeguard policies becoming box-checking exercises. For example, while a third-party verifier can easily prove that a consultation happened, it is harder to verify what really matters for ensuring adequate safeguards are in place: whether all stakeholders knew about the meeting, and whether they were able to influence project design and implementation.¹⁰ A recent study of Verra's REDD+ offset methodologies, the project type with the most credits on the voluntary carbon market, found that Verra safeguard policies were practically meaningless because of poor enforcement.¹¹ Project developers commonly failed to meet safeguard requirements, while verifiers commonly approved projects even when non-compliance was blatant.

The Article 6.4 Sustainable Development (SD) Tool (“the Tool”),¹² the safeguards instrument of the Paris Agreement Crediting Mechanism, and its proposed revision¹³ do not do enough to overcome these structural challenges. The Tool takes a risk-based approach, requiring project developers to assess project risk across 11 safeguard elements (e.g., human rights, land acquisition and involuntary resettlement). Activity participants must develop mitigation plans for all identified risks at the start of the project for monitoring throughout the project life.¹⁴ Our assessment of the Tool, based on published literature and our own expertise with mangrove restoration projects in Nigeria, Madagascar, and Mexico, highlights five overarching design failures:

- 1) Even though the Tool requires compliance with international human rights standards, the Tool's compliance is still structured around risk identification, avoidance, and mitigation rather than rights protections;
- 2) Core protections such as FPIC, participation in project design, and benefit-sharing apply only if the developer identifies a relevant risk at the start of the project, rather than as universal obligations enforced throughout the project lifetime;¹⁵
- 3) Guiding questions use vague language without elaboration of what constitutes compliance, such as how “meaningful” participation should be judged, which can easily become box-checking exercises rather than enforceable protections;

⁹ [Draft Article 6.4 Sustainable Development Tool, A6.4-SBM021-AA-A03, Version 02.0, Section 5, paragraph 21\(d\)](#)

¹⁰ Giles & Coglianesse, 2025; Haya et al., 2023

¹¹ Haya et al., 2023

¹² [Article 6.4 sustainable development Tool, A6.4-TOOL-AC-001, Version 01.1](#)

¹³ [Draft Article 6.4 Sustainable Development Tool, A6.4-SBM021-AA-A03, Version 02.0](#)

¹⁴ [Article 6.4 Sustainable Development Tool, A6.4-TOOL-AC-001, Version 01.1, Table 2, paragraph 28](#)

¹⁵ [Draft Article 6.4 Sustainable Development Tool, A6.4 SD Tool, Version 02.0, paragraph 85 \(E9.2\), 88 \(E9.5\), 89 \(E9.6\)](#)

- 4) Risk is assessed at the project level, with no requirement to take into account the underlying risks associated with governance weaknesses, histories of human rights abuses and land conflict, or the human rights track record of implementing parties; and
- 5) Verification operates under the same structural conflicts of interest that have weakened third-party verification across other carbon crediting programs, with no requirement for independent sources, independent stakeholder outreach, or ongoing participatory monitoring of substantive community outcomes.

The result is a framework where a developer acting in bad faith can satisfy the requirements as easily as one acting in good faith.

We find that for mangrove restoration projects across our three study regions (Mexico, Madagascar, and Nigeria), the SD Tool's reliance on procedural compliance and narrow triggers of mitigation action could easily fail to safeguard community rights. In each context, mangrove restoration projects are being layered onto pre-existing patterns of marginalization, contested tenure, and, in some cases, decades of state-complicit harm—contextual conditions that the Tool does not require to be considered. By focusing risk assessment at one point in time during the project registration process, the Tool overlooks the gradual loss of land access, which has happened with forest projects in Mexico. Further, by setting no minimum criteria for who counts as a stakeholder, the Tool allows marginalized groups, such as fishing households and women in subsistence roles in Mexico, to be left out of stakeholder recognition. In Madagascar, current regulations could be considered sufficient to meet land tenure-related safeguard requirements, even though in practice, delays in their implementation, incomplete village mapping, and lack of transparency in how community complaints are addressed have resulted in insecure tenure and unrecognized livelihood losses from past forest conservation projects. In Nigeria, the Tool's shortcomings are most pronounced, operating within a context characterized by compounding risk factors spanning legal, governance, socioeconomic, and institutional dimensions, that each independently warrant serious concern and collectively establish a baseline of harm that the Tool's current procedural framework is fundamentally ill-equipped to address. The Tool's safeguard policies are undermined from the outset by a governance environment in which state actors simultaneously occupy the roles of land authority, environmental regulator, implementing agency, and financial beneficiary of the industries responsible for the very degradation those projects are designed to address—a structural conflict of interest for which the Tool contains no detection mechanism prior to project registration. In this context, the Tool's reliance on government-certified baselines, self-reported due diligence, and conformity with host country legal frameworks does not merely fall short; it actively misrepresents the level of protection afforded to affected communities.

Together, these cases point to what is needed instead for meaningful safeguard enforcement: stakeholder engagement that runs throughout the project lifecycle, from design through implementation, and engagement conducted by actors with deep knowledge of local land tenure, community dynamics, and regional histories of human rights—the only basis on which safeguards can be meaningfully enforced. Achieving this type of stakeholder engagement requires a fundamental shift in how the Tool is structured. It requires a move toward enforceable and

outcome-oriented safeguard requirements capable of operating independently of state interests, including clear and enforceable obligations for developers grounded in a rights-based approach, and a verification system redesigned as a credible enforcement mechanism. A shift to a rights-based approach means a shift from mainly avoiding negative impacts on beneficiaries to treating affected communities as holders of legally enforceable rights. It also means enforcing developers' obligations to respect, protect, and uphold those rights, as well as more specific obligations for effective enforcement. Operationally, this requires shifts in developer obligations in four project phases. ***Before project design begins***, risk assessment should extend to the governance context, including tenure rights and histories of human rights abuses, and must be conducted as a precondition for registration. ***Stakeholder engagement*** should occur throughout the project life, from design through implementation. Those conducting consultation must have the trust of the engaged communities; affected stakeholders must be mapped before consultation begins to give the verifier a concrete reference point; and FPIC must be treated as a continuous, staged process extended to all communities with customary relationships to land, not a one-time event limited to formally recognized Indigenous Peoples. ***During implementation***, access to land and resources must be monitored over time, disaggregated by gender, wealth, and membership status, and with predefined thresholds that trigger corrective action. Affected communities must have a formal role in designing what gets monitored and reviewing compliance data, and benefit-sharing must be governed by formal written agreements with time-bound, transparent commitments. ***After the crediting period closes***, the UN must maintain a regulatory accountability channel, particularly for removal projects where harm can take decades to materialize.

These developer obligations are only enforceable if the verification system can credibly check them. The DOE's role under this framework is to confirm through independent inquiry (not only review of developer documentation) that the contextual risk assessment was conducted, but that consultation actors also met substantive standards, that FPIC was implemented continuously and inclusively, and that access-tracking and benefit-sharing arrangements are operating as committed with corrective triggers in place. To do this credibly, we recommend restructuring DOE hiring to remove the developer-DOE financial relationship, mandating local and sectoral expertise on every verification team, expanding the verification protocol with specific assessment questions for each safeguard element, and requiring DOE to consult independent published sources, interview local experts with no financial interest in the project, and conduct independent stakeholder outreach.

Specific Recommendations for Updating the Sustainable Development Tool

Shifting from a risk-based to a rights-based framework

The Article 6.4 SD Tool primarily adopts a risk-based approach by structuring safeguard compliance around developer-led risk assessments at the project's inception. This framework relies on the developer to identify potential harms and propose mitigation measures, which then serve as the

main basis for ongoing monitoring. However, this approach positions local communities mainly as passive beneficiaries or recipients of “do no harm” protections rather than partners in project decisions with enforceable rights. There is now a growing consensus that a rights-based approach is better adapted to avoiding detrimental outcomes in diverse and complex socio-cultural, historical, and political contexts across the Global South.¹⁶ A rights-based approach positions individual and collective rights, including the right of affected communities to participate in decisions affecting their lands, livelihoods, and futures, as the central pillar of project development through the full project lifecycle: planning, design, implementation, and outcomes.¹⁷ This transition reframes the relationship between stakeholders from one of “implementers” and “beneficiaries” to one of “duty-bearers” and “rights-holders.”¹⁸ This redefinition establishes a strong accountability obligation based on the argument that a rights entitlement requires a matching obligation to guarantee those rights are respected.¹⁹

Our specific recommendations for amending the tool are all aligned with a shift to a rights-based approach, promoting empowered participation at every stage of the project, non-discrimination (prioritizing vulnerable and marginalized groups), benefit sharing, accountability, and grounding rights in domestic and international legal frameworks.

Developer Requirements

1. Create significantly more specific sub-criteria for complying with each principle

To date, the greatest challenge to the effectiveness of safeguard policies is in their enforcement. A recent study of Verra’s safeguard policies for REDD+ (avoided deforestation) offset projects, which are very similar to the SD Tool’s requirements, found that it is common for developers not to meet policy requirements, and for verifiers to positively verify projects nonetheless.²⁰ Part of the enforcement challenge is that verifiers must assess the quality, not just the presence, of safeguard processes (e.g. stakeholder identification and community engagement), which involves judgment. Developers benefit financially from moving projects forward quickly. Verifiers, who are hired directly by developers, have a financial incentive to be lenient so they can be hired again. In these contexts, weak enforcement is common practice.²¹

Recommendations: We strongly recommend expanding the safeguard requirements to more substantially specify criteria for each principle. Many of our recommendations that follow are examples of how the current tool is vague, and ways the UN could provide greater specificity in how

¹⁶ Sarmiento Barletti et al., 2023

¹⁷ Sarmiento Barletti et al., 2023

¹⁸ Nelson & Dorsey, 2018

¹⁹ Broberg & Sano, 2018

²⁰ Haya et al., 2023

²¹ Giles & Coglianese, 2025; Haya et al., 2023; MSI Integrity, 2020

developers can meet safeguard principles. Carefully expanded criteria will instruct verifiers in how to enforce the principles and help prevent safeguard policies from being box-checking exercises.

2. Mandate a contextual risk assessment of the governance environment as preconditions for registration, including mandatory land tenure mapping and resolution of tenure conflicts.

In assessing project risk, The Tool does not explicitly require an assessment of the governance conditions within which the project will operate. This is especially important in contexts characterized by overlapping and unresolved tenure regimes, land conflicts, weak enforcement of environmental law, and national frameworks that undermine customary land rights. When governance and tenure conditions are assessed only through developer characterization, safeguards may fail to identify who holds rights, who faces displacement risk, which tenure claims overlap, and which communities are excluded from consultation altogether. For example, in Madagascar, management transfer contracts have been delayed for years due to incomplete rights documentation, resulting in prolonged uncertainty over who holds decision-making authority and who must be included in consultation and benefit-sharing processes. In Nigeria, the Land Use Act of 1978 denies formal recognition to the customary tenure systems on which Niger Delta communities depend, despite overlapping formal, informal, and customary claims governing intertidal and coastal areas. In each context, tenure mapping and governance assessment are necessary because the absence of tenure mapping may leave overlapping claims and exclusion from consultation outside the scope of safeguard review altogether. These gaps are reinforced by the SD Tool itself. **Element 8** (Land Acquisition and Involuntary Resettlement) of the Tool requires the developer to “conduct a census and a socioeconomic baseline survey to identify all affected individuals, groups or communities” only upon identification of physical or economic displacement,²² allowing the risk analysis to overlook actors the developer has incentive not to recognize particularly communities with informal or undocumented tenure, whose inclusion would expand the developer’s safeguard obligation. The same pattern appears in **Element 9** (Indigenous Peoples), which requires recognition of indigenous land rights without requiring independent mapping or verification of those rights before registration.²³

Recommendation: The tool should require a baseline assessment of the governance environment based on independent data sources as a binding precondition for project registration, particularly regarding land tenure. Such an assessment can be prepared by a party with no financial interest in project approval, or by the developer drawing on independent sources such as UN Special Procedures reports, regional human rights body findings, or documented histories of land conflict in the project area.

The assessment must, at minimum:

²² [Article 6.4 sustainable development tool, A6.4-TOOL-AC-001, Version 01.1, Section 8.4, paragraph 75](#)

²³ [Article 6.4 sustainable development tool, A6.4-TOOL-AC-001, Version 01.1, Section 9.4, paragraph 81](#)

- Map all tenure regimes applicable to the activity area (including formal, communal, federal, customary, protected-area claims) and identify where those regimes' conflicts remain unresolved;
- Document the recorded history of land conflicts, forced eviction, and resource disputes in the activity area; and
- Assess the institutional track record of project developers and their implementing partners with respect to prior consultation, tenure obligations, and human rights.
- Where projects are unable to demonstrate that material tenure conflicts have been resolved through a process that includes community participation in the design of that resolution, they should not be eligible for registration.

The quality of community participation in this design process should be evidenced through participation records and independent observation by a civil society organization, legal observer, or human rights monitor with no interest in project approval. Documentation of community participation should also include a sign-off on process design documentation, where communities formally confirm what has been agreed upon by all involved entities, and confirm that there is a clear mechanism to flag discrepancies before resolution processes can proceed. Conflict-of-interest disclosures should additionally be released by all facilitators, technical advisors, and government representatives engaged in the design phase.

3. Ensure inclusive and meaningful consultation processes.

a. Set a standard for who runs the consultation and how it is conducted.

Who runs the consultation profoundly shapes what it produces. Across our three study regions and the broader carbon offset literature, the pattern is clear: consultations routinely fail to reach the most affected groups, while the actors conducting them are typically those with the strongest incentive to avoid surfacing objections. Meaningful consultation depends on three conditions operating together: the consulting actor must be free of financial or institutional incentives to approve the project; they must possess deep knowledge of the local social, ecological, and political context; and they must hold the trust of the affected community—a relational asset built over years that cannot be transferred or substituted by formal credentials. Where any one of these conditions is absent, consultation tends to surface what communities are willing to say to outsiders rather than what they actually need to communicate.

The SD Tool fails on all three counts. Appendix 2 of the Activity Standard places nearly every procedural decision in the project developers' hands, from identifying and inviting stakeholders to determining which comments are ultimately incorporated (Paras 2, 3, 10, 13).²⁴ The Tool sets no requirements on who conducts the consultation, what contextual knowledge they must hold, or what relationship they must have with the community. In Mexico, this translated into the systematic exclusion of fishing households, women in subsistence roles, and non-ejido settlers from stakeholder

²⁴ [Article 6.4 activity standard for projects, A6.4-STAN-AC-002, Version 01.1](#)

recognition. In Madagascar, incomplete village mapping left entire communities outside the consultation perimeter. In Nigeria, where the government is a project developer, consultations were conducted by the very state actors whose conduct they are meant to evaluate. Still, the primary complaint channel routes grievances also to the host country government (the agency designated as the Designated National Authority).²⁵

Recommendation: We recommend that the Tool set substantive standards on both the actor conducting the consultation and the consultation process.

Standard on the actor. Whether the consultation is conducted directly by the project developer or through a third party engaged for this purpose, the responsible actor must demonstrate:

- A track record of community engagement in the region or jurisdiction of the project.
- Local knowledge of the social, ecological, and political context.
- Established relationship or familiarity with the affected communities.
- Trust from the community, evidenced by community-reported acceptance of the actor's role.

This approach also strengthens the broader ecosystem of safeguards. Community-based organizations, regional NGOs, and other actors who already carry out this work in practice—and who often struggle to obtain stable funding for it—gain the institutional recognition that makes their continued operation viable. Recognizing local labor rather than substituting it with parachuted-in facilitators is not only a benefit-sharing principle, but a precondition for safeguards that function over time. The actors with the contextual knowledge and community trust required for meaningful consultation are precisely those already embedded in these regions.

Standard on the process. The tool should require the following sequence:

- Upfront stakeholder mapping. The universe of affected stakeholders must be mapped using methodologies that combine participatory community mapping, key informant triangulation across diverse social positions (including gender, age, ethnicity, and tenure status), and iterative validation with affected groups, rather than relying solely on lists provided by community authorities. This mapping serves a dual function: it defines who must be consulted, and it provides the DOE with a concrete reference point against which to verify whether the consultation actually reached affected individuals.
- Disclosure of who facilitated the consultation, along with any current or recent contractual, institutional, or financial relationship with the developer
- Documentation of how community objections were raised, recorded, and responded to.

b. Establish FPIC as a continuous, staged, and substantively inclusive process.

²⁵ [Article 6.4 activity standard for projects, A6.4-STAN-AC-002, Version 01.1, Appendix 2, paragraph 14](#)

Free, Prior, and Informed Consent (FPIC) is too often reduced to a procedural requirement rather than a substantive and ongoing process, and it routinely fails in practice. It dictates that consent be genuinely free, given before project decisions, fully informed, and treated as an actual decision that the community can refuse. Communities may be formally “consulted” without influence over decisions: information about project risks, alternatives, or long-term implications is often partial, presented in technical formats inaccessible to affected groups, or delivered after key decisions are already made. Broad references to “participation” can also obscure whether communities were actually informed, whether their concerns were incorporated, or whether they could shape or refuse project outcomes.²⁶ When FPIC is treated as a one-time exercise at project approval rather than a continuous process throughout implementation, communities lose their ability to respond to evolving project conditions and design changes.

Under the Tool, FPIC obligations apply only to Indigenous Peoples (Element 9), and only when activities affect territory, land, or resources, cultural heritage, or sacred sites (Element 9.5). As a result, non-Indigenous communities with customary relationships to land fall outside the scope. Where FPIC does apply, the Tool defines consent only in general terms as full and effective participation (Element 9.2) and engaging in negotiations that shape the design, implementation, monitoring, and evaluation of the activity (Element 8.2, footnote 47).²⁷ It does not operationalize what these require in practice. Once consent is documented at registration, there is no requirement to renew it when design changes, activities expand, or benefit-sharing arrangements shift.

Recommendation: The Tool should establish FPIC as a continuous, staged, and inclusive process, supported by clear and verifiable documentary requirements.

To make FPIC operational, the Tool should require, at minimum:

- **Application of FPIC to all affected communities with customary relationships to land and resources**, not only to those formally classified as Indigenous Peoples.
- **Disaggregation of “participation” by stage of engagement.** Project documentation must disclose the specific role held by community representatives, women, and other marginalized groups for each stage (consultation, communication, negotiation, and consent). Lumping these stages under a single label conceals whether communities actually contributed to project decisions or were merely informed.
- **Renewal of consent across the project lifetime.** Consent should be renewed before major design changes, expansions, contract renewals, and changes to benefit-sharing arrangements supported by ongoing dialogue with affected communities.
- **Technical support for communities.** The “informed” element of FPIC can depend on communities having access to independent technical assistance to understand carbon markets, their legal rights, and the contracts they are asked to sign. Where the

²⁶ Dunlap, 2018; Fontana & Grugel, 2016

²⁷ [Article 6.4 sustainable development tool, A6.4-TOOL-AC-001, Version 01.1, footnote 47](#)

documentation requirements above are met in substance, this support tends to emerge as part of the process; where it does not, it should be provided before key consent moments.

- **Documentation of FPIC compliance against concrete sub-criteria.** At minimum, the Tool should require project developers to provide: (1) consultation materials in local languages with a defined minimum period before any decision; (2) an independent observer's report confirming that the community had dedicated space and time to deliberate internally and separate from consultation meetings with the developer, and before reaching a decision no project developers were present during community deliberation; (3) disaggregated attendance records showing women and other marginalized groups met a defined minimum threshold; (4) all inputs raised by the community and the documented response to each, including which were incorporated into project design and which were not with reasons; and (5) confirmation that communities were explicitly informed of their right to refuse the project entirely before consent was requested and that this refusal would be honored.

c. **Treat access to land as an ongoing obligation, not a one-time check.**

Communities can experience gradual erosion of land access through project activities, exclusion zones, or new resource pressures without any single event meeting the threshold for “displacement.” For example, in Mexico, communities retained legal rights to land or resources but progressively lost the practical ability to use them, as overlapping tenure regimes (ejido, federal marine zones, protected areas) introduced competing claims on resource access.

Element 8 (Land Acquisition and Involuntary Resettlement) addresses “physical displacement (relocation, loss of residential land or loss of shelter) and economic displacement (loss of land, assets, or access to assets, leading to loss of income sources or other means of livelihood).”²⁸ Access conditions are evaluated only at registration (and treated as fixed thereafter), not as something that needs to be monitored over time. Once a project is registered, the Tool does not require ongoing tracking of access. Section 6.2 obliges project developers to describe monitoring procedures for “activity-level environmental and social indicators”²⁹ that are verified by the DOE at each issuance request, but the structure leaves four gaps that together creates a process that fails to surface gradual access erosion: (1) the choice of indicators is left to the project developer; (2) no indicator specifically addressing access is required; (3) disaggregation by wealth group, gender, or membership status is not required; and (4) no defined threshold triggers corrective action when conditions deteriorate. The same gaps apply to the mitigation measures themselves: the Tool requires the project developer to describe monitoring procedures for indicators “relevant to mitigation strategies and measures” (Section 6.2), but does not require those indicators to track whether the mitigation actually addressed the underlying harm, only that the project developer continued to report on them. This architecture is blind to the form of harm most likely to occur in nature-based mitigation projects: gradual erosion of communities’ practical ability to use land and resources, accumulating over years rather than registering as any discrete event.

²⁸ [Article 6.4 sustainable development tool, A6.4-TOOL-AC-001, Version 01.1, Section 6.4.5, paragraph 71](#)

²⁹ [Article 6.4 sustainable development tool, A6.4-TOOL-AC-001, Version 01.1, Section 6.2, paragraph 25](#)

Recommendations: The Tool should be revised to require monitoring and demonstration of effective access to land and resources over time as a condition of ongoing compliance, not only at the point of registration.

To make this operational, the Tool should require, at a minimum:

- **A disaggregated baseline of access conditions.** Developers must establish baseline access conditions disaggregated by wealth group, gender, and membership status, covering the full population in the activity area, not only those already identified as physically or economically displaced. Without disaggregation, exclusion patterns affecting women, non-titled community members, or marginalized subgroups remain invisible from the start.
- **Continuous monitoring of access indicators,** including resource use across all actors, livelihood activities, and exclusion patterns across different social groups. The assessment should be updated throughout the project lifecycle to track changes in access conditions and incorporate new resource users as they emerge.
- **Tracking of mitigation effectiveness, not just implementation.** Monitoring should verify not only that planned mitigation measures were implemented as described in the Environmental and Social Management Plan, but also whether they actually addressed the risks they were designed to mitigate. Where access continues to erode despite mitigation measures in place, this should trigger reassessment of the mitigation plan rather than be treated as acceptable residual harm.
- **Predefined compliance thresholds and triggers, which obligate developers to take corrective action when declines in access are detected.** These actions may include revising mitigation measures, accelerating benefit delivery, or suspending project activities.

d. Establish participatory Monitoring, Reporting, and Verification (MRV) across all safeguard components.

In carbon offset programs, as well as in the SD Tool's structure, monitoring, reporting, and verification of safeguard compliance is typically designed and conducted by the project developers themselves—the same parties whose conduct is being evaluated. Affected communities are given no formal role in defining what gets measured or reviewing what the data show.³⁰ Without participatory MRV, the people whose rights and livelihoods the safeguards are meant to protect have no way to flag harm that the developer's own indicators fail to capture, and the gap between what the documentation shows and what is happening on the ground remains invisible until grievances surface, often years after consent was originally given.

The Tool's monitoring architecture has two structural gaps. First, communities have no role in designing what gets measured: under Section 6.2, paragraph 25, developers must describe “the monitoring procedures for activity-level environmental and social indicators relevant to mitigation

³⁰ Lasheras et al., 2024, Saeed et al. 2017

strategies and measures to avoid or minimize identified risks,”³¹ with no requirement for disaggregation by gender, wealth group, or membership status. Second, the DOE's verification under paragraph 27 is limited to confirming that monitoring of those indicators took place during each issuance request.³² Section 3.3, paragraph 17 establishes a “continuous engagement mechanism” through which stakeholders can “comment on compliance,”³³ but this opens only after the project is registered, and only on a monitoring system the project developer has already designed. Commenting is not the same as designing.

Recommendation: The Tool should be revised to require participatory MRV as a transversal principle across all safeguard components.

To make this operational, the Tool should require:

- **Participatory design of monitoring indicators across all safeguard components.** Affected communities must have a formal role in defining what gets monitored, not only access to land and resources, but also FPIC compliance, benefit-sharing delivery, gender-disaggregated outcomes, and grievance mechanism effectiveness. The Tool should specify minimum indicators for each safeguard component and require project developers to document how communities, including women and marginalized groups, contributed to indicator selection.
- **Community review of monitoring data and the right to initiate adaptive management.** Affected communities must have ongoing access to monitoring data in usable formats and a formal mechanism to initiate corrective action through the grievance system when their experience diverges from what the data show. Compliance review cannot be a one-way disclosure to the DOE.
- **Independent verification of MRV design, not only of MRV documentation.** The DOE's verification should extend beyond confirming that monitoring took place to assessing whether the indicators selected actually capture the impacts most relevant to affected communities. Where indicators were selected without community input, or where monitoring data systematically diverge from community-reported outcomes, validation should be withheld until the gap is addressed.

4. Implement clear and effective accountability mechanisms

- a. **Require formal written agreements between the developer and affected communities.**

Even when FPIC has been obtained and benefit-sharing arrangements have been formally established at project registration, communities frequently find that the commitments made to them

³¹ [Article 6.4 sustainable development tool, A6.4-TOOL-AC-001, Version 01.1, Section 6.2, paragraph 25](#)

³² [Article 6.4 sustainable development tool, A6.4-TOOL-AC-001, Version 01.1, Section 6.2, paragraph 27](#)

³³ [Article 6.4 sustainable development tool, A6.4-TOOL-AC-001, Version 01.1, Section 3.3, paragraph 17](#)

are not honored. Commitments are commonly made as verbal assurances, generalized commitments to equitable benefit-sharing, and aspirational language rather than enforceable obligations. When benefit-sharing lacks specific terms (including defined amounts, governance structures, timelines, and dispute resolution mechanisms), developers retain effective discretion to adjust commitments as project conditions evolve, while communities are left without legal recourse. In Madagascar, this pattern has played out across more than a decade of forest conservation projects, where promised benefits failed to materialize and grievance mechanisms proved unable to compel resolution³⁴. So often, community members pay the greatest project costs through offering use of their land and through restricted access to resources and livelihoods, while developers and community elites capture most carbon profits and other project benefits with little recourse for community members.³⁵ To minimize costs, developers are also incentivized to adopt the lowest acceptable levels of social safeguards and benefit-sharing, setting precedents that other developers may follow, undermining safeguard principles and exacerbating inequities.³⁶

The Tool relies on procedural compliance for benefit-sharing, but lacks enforceable requirements to prevent downward pressure on social standards and inequitable benefit-sharing. While it acknowledges the importance of ensuring equitable benefit-sharing to Indigenous Peoples (Element 9), the tool does not specify how such benefits should be identified, assessed, verified, or distributed in practice. Moreover, it does not establish comprehensive or mandatory requirements for benefit-sharing arrangements, unlike some other registries or standards.³⁷

Recommendation: We recommend that the tool introduce mandatory, binding, and outcome-oriented provisions for benefit-sharing and social safeguards. In particular, the Tool should require formal written agreements between the developer and affected communities as a condition of project approval, based on transparent disclosure of carbon revenue agreements and ensuring fair distribution of proceeds between the developer and communities. These agreements should clearly define: expected monetary and non-monetary benefits, including livelihood support and capacity-building; who will be eligible; how those benefits will be distributed; delivery timelines; and reporting requirements throughout the project lifecycle. Agreements should also specify governance structures for managing benefit distribution. The Guatecarbon REDD+ Project offers a model for how agreements should be structured: a governance body oversees strategic decisions, a benefit distribution committee ensures compliance with agreed procedures, and a fund manager is responsible for financial administration.³⁸ Financially, benefit-sharing arrangements should be designed so that higher-than-expected carbon price revenues are shared with communities.³⁹ Finally, agreements should be established prior to project implementation and remain adaptive, with predefined periodic reviews to maintain ongoing social consent.

³⁴ Poudyal et al, 2016, 2018, Favretto et al, 2020

³⁵ Persha & Andersson, 2014; Poudyal et al., 2016, 2018

³⁶ Grislain & Kubitzka, 2025

³⁷ Healy et al., 2023

³⁸ Asociación de Comunidades Forestales de Petén, 2026

³⁹ Carbon Market Watch, 2025

b. Establish a regulatory accountability mechanism that operates beyond the developer-community contract and the crediting period.

Carbon projects can generate impacts that take decades to fully manifest, especially in removal projects where ecological recovery and community livelihood adjustments unfold over long timelines. Yet, the safeguards architecture under the Tool and the Article 6.4 Activity Standard (A6.4-STAN-AC-002) it works within is designed as a temporally bounded obligation of the project developer: once the crediting period ends, the formal channels through which communities can raise concerns about the project's ongoing impacts ends with it,⁴⁰ and post-crediting monitoring obligations under Section 10, where they exist at all, are limited to GHG reversal verification and do not include social or grievance mechanisms.⁴¹ Affected communities can be left without recourse, as serious impacts materialize, but credits have already been issued and sold.

Recommendation:

We recommend that the UN Article 6.4 Grievance mechanism should be accessible beyond a project's last crediting period and for a period that reasonably covers the potential for harms to materialize.

Verifier Requirements

The DOEs (Article 6.4 verifiers) are the primary enforcers of safeguard compliance. Safeguard policies will only ensure rights are protected, harm is avoided, and promises are kept if the verification process independently assesses whether developers have implemented them. Here, we recommend specific updates to the verification process that, when paired with more specific safeguard requirements (Recommendation #1 for developer requirements above), can overcome conflicts of interest and better ensure effective safeguard policy enforcement:

- 1. Restructure verifier hiring to remove the developer-DOE financial relationship.** A structural change may be most important to repairing the verification process. We recommend that DOEs be hired by an independent body, such as an expert body that is part of the Paris Agreement Crediting Mechanism, rather than by the developer. The carbon credit registry, Isometric, runs a verification process designed to eliminate conflicts of interest at multiple points: Isometric—not the project developer—selects and engages the verifier, bears the cost of verification, and charges buyers a flat fee independent of the number of credits issued.⁴² This model removes the direct financial relationship between the developer and verifier that creates incentives for lenient verification.

⁴⁰ *Article 6.4 activity standard for projects*, A6.4-STAN-AC-002, Version 03.0, Section 7.1, paragraph 94,

⁴¹ *Article 6.4 activity standard for projects*, A6.4-STAN-AC-002, Version 03.0, Section 10, paragraphs 171–172

⁴² *Isometric Standard*, Version 2.0, Sections 1.2.2 (Incentive Alignment) and 4.4 (Conflicts of Interest). Available at <https://registry.isometric.com/standard>

2. **Require local and sectoral expertise on every DOE team.** At least one member of the DOE team assigned to a project should have local and sectoral knowledge sufficient to assess project and contextual risk, stakeholder maps, the quality of community engagement, and the sufficiency of mitigation measures in that specific context.
3. **Expand the verification protocol to include specific assessment questions for each safeguard element.** We recommend that the verification protocol be expanded for each of the eleven safeguard elements to include a set of sub-questions for each one. These should include: what evidence supports the developer's claims, what independent sources confirm or contradict those claims, and how impacts differ across gender, ethnicity, tenure statuses, and income groups.

For Element 4 (Human Rights), the DOE should be required to consult UN Special Procedures, regional human rights findings, and civil society reports, rather than relying only on developer-provided due diligence. For Element 8 (Land Acquisition and Involuntary Resettlement), the DOE should explicitly verify that overlapping tenure systems were fully mapped and that no forms of access-based displacement were left undocumented. For Element 9 (Indigenous Peoples), the DOE should independently verify FPIC against clear substantive criteria (see Recommendation 3b), rather than relying solely on documentation provided by the developer.

4. **Require DOEs base their assessment on a range of independent sources.**
 - a. **Require DOEs to search for independent written sources.** DOEs should be required to search for independent written sources to examine risk, stakeholder maps, consultation effectiveness, and project outcomes related to safeguard principles, including news articles, NGO reports, and academic studies.
 - b. **Require DOEs to interview individuals with a deep understanding of the local context and with no financial interest in the carbon project or market.** Perhaps one of the most important findings across our case studies is the importance of trustful relationships with communities. This may be especially important in high-risk locations where project success and harm avoidance rely heavily on relationships, agreements, and processes developed over time to address the specific livelihood, land tenure, and resource access risks of the region. DOEs should be required to consult independent experts, including those from local NGOs, international human rights organizations, and research institutions working in the region, to gain independent assessments of whether the project and project developer met the safeguard principles. This is especially critical in any area with a history of human rights abuses, involuntary resettlement, and land tenure disputes. Failure to consult or reconcile independent evidence should constitute incomplete verification. The verification protocol should require DOEs to document consultation of independent sources.

- c. **Require DOEs to talk to a diversity of project stakeholders.** DOEs should speak individually to a range of stakeholders to assess whether they have been adequately engaged in project design and implementation from the start, whether there have been negative outcomes over time, and compliance with benefit-sharing arrangements and other safeguard policy requirements. It is important to talk to individuals from all stakeholder classes to understand the impacts on different groups, and to avoid hearing more from elites. Interviewee choices should be data-based, drawing on the data collected through stakeholder maps, land tenure maps, grievance mechanisms, and other independent data sources. It will be important for the developer not to know when consultations occur and whom the verifier plans to speak to, which has hampered open communication in the past. In line with sound research methods, DOE representatives should present themselves as independent evaluators not connected with the developer team.

References

Asociación de Comunidades Forestales de Petén (ACOFOP) & Rainforest Foundation US (RFUS). (2026). Guatecarbon jurisdictional REDD+ case study. <https://rainforestfoundation.org/wp-content/uploads/EN-Guatecarbon-Case-Study.pdf>

Broberg, M. and Sano, H. O. (2018). Strengths and weaknesses in a human rights-based approach to international development – An analysis of a rights-based approach to development assistance based on practical experiences. *The International Journal of Human Rights* 22(5), 664–680. <https://doi.org/10.1080/13642987.2017.1408591>

Carbon Market Watch. (2025). Sierra Leone Carbon market demonstrates more equitable benefit sharing is possible. <https://carbonmarketwatch.org/2025/12/03/sierra-leone-carbon-market-project-demonstrates-more-equitable-benefit-sharing-is-possible/>

Cavanagh, C., & Benjaminsen, T. A. (2014). Virtual nature, violent accumulation: The 'spectacular failure' of carbon offsetting at a Ugandan National Park. *Geoforum*, 56, 55–65. <https://doi.org/10.1016/j.geoforum.2014.06.013>

Counsell, S. (2023, March). Blood carbon: How a carbon offset scheme makes millions from Indigenous land in Northern Kenya. Survival International. <https://www.survivalinternational.org/news/13659>

Due Process of Law Foundation (DPLF). (2018). Institutional Report 2012-2017. <https://dplf.org/en/who-we-are/annual-reports/>

Duker, A. E. C., Tadesse, T. M., Soentoro, T., de Fraiture, C., & Kemerink-Seyoum, J. S. (2019). The implications of ignoring smallholder agriculture in climate-financed forestry projects: Empirical evidence from two REDD+ pilot projects. *Climate Policy*, 19(sup1), S36–S46. <https://doi.org/10.1080/14693062.2018.1532389>

Dunlap, A. (2018). "A Bureaucratic Trap:" Free, Prior and Informed Consent (FPIC) and Wind Energy Development in Juchitán, Mexico. *Capitalism Nature Socialism*, 29(4), 88–108.

<https://doi.org/10.1080/10455752.2017.1334>

Favretto, N., Afionis, S., Stringer, L. C., Dougill, A. J., Quinn, C. H., & Ranarijaona, H. L. T. (2020). Delivering climate-development co-benefits through multi-stakeholder forestry projects in Madagascar: opportunities and challenges. *Land*, 9(5), 157.

<https://doi.org/10.3390/land9050157>

Fontana, B., & Grugel, J. (2016). The politics of Indigenous participation through "Free Prior and Informed Consent." *World Development*, 77(1), 249–261.

<https://doi.org/10.1016/j.worlddev.2015.08.023>

Giles, C., & Coglianese, C. (2025). Auditors can't save carbon offsets. *Science*, 389(6756), 107-107.

<https://doi.org/10.1126/science.ady4864>

Griffiths, T. (2008). Seeing 'REDD'? Forests, climate change mitigation and the rights of Indigenous peoples and local communities. Forest Peoples Program.

<https://www.forestpeoples.org/en/topics/redd-and-related-initiatives/publication/2010/seeing-redd-forests-climate-change-mitigation-a>

Grislain, Q. & Kubitza, C. 2025. Global Carbon Markets and Rural Development in Madagascar. *GIGA Focus Africa*, 3.

<https://doi.org/10.57671/gfaf-25032>

Haya, B. K., Alford-Jones, K., Anderegg, W. R. L., Beymer-Farris, B., Blanchard, L., Bomfim, B., Chin, D., Evans, S., Hogan, M., Holm, J. A., McAfee, K., So, I. S., West, T. A. P., & Withey, L. (2023). *Quality assessment of REDD+ carbon credit projects..* Berkeley Carbon Trading Project.

<https://gspp.berkeley.edu/research-and-impact/centers/cepp/projects/berkeley-carbon-trading-project/REDD+>

Healy, S., Pietschmann, M., Schneider, L., & Karki, A. (2023). Assessing the transparency and integrity of benefit sharing arrangements related to voluntary carbon market projects. *Öko-Institut eV*.

<https://carbonmarketwatch.org/wp-content/uploads/2023/11/Assessing-transparency-and-integrity-of-benefit-sharing-arrangements-related-to-voluntary-carbon-market-projects.pdf>

Inter-American Commission on Human Rights (IACHR). (2022). Annual Report of the Inter-American Commission on Human Rights 2021. OEA/Ser.L/V/II, Doc 64 rev. 1. General Secretariat, Organization of American States.

<https://www.oas.org/en/iachr/docs/annual/2021/Chapters/IA2021-Intro-en.pdf>

Inter-American Commission on Human Rights (IACHR). (2025). Annual Report of the Inter-American Commission on Human Rights 2024. OEA/Ser.L/V/II, Doc. 39 rev. 2. General Secretariat, Organization of American States.

https://www.oas.org/en/iachr/docs/annual/2024/IA2024_ENG.pdf

International Labour Office (ILO). (2017). Annual Report 2016. International Labour Office. https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_emp/%40emp_ent/documents/publication/wcms_866320.pdf

Kansanga, M. M., & Luginaah, I. (2019). Agrarian livelihoods under siege: Carbon forestry, tenure constraints and the rise of capitalist forest enclosures in Ghana. *World Development*, 113, 131–142. <https://doi.org/10.1016/j.worlddev.2018.09.002>

Lachnitt, J., Tilianaki, M., & Baldon, C. (2023). Carbon offsetting at the cost of human rights? The case of TotalEnergies' BaCaSi project in Congo. Secours Catholique - Caritas France. https://www.secours-catholique.org/sites/default/files/03-Documents/BACASI_EN-Web_0.pdf

Larson, A. M., Brockhaus, M., Sunderlin, W.D., Duchelle, A., Babon, A., Dokken, T., Pham, T.T., Resosudarmo, I. A. P., Selaya, G., Awono, A., & Huynh, T.B. (2013). "Land Tenure and REDD+: The Good, the Bad and the Ugly." *Global Environmental Change*, 23(3), 678–689. <https://www.sciencedirect.com/science/article/abs/pii/S0959378013000447>

Lasheras, T., Barletti, J. P. S., & Larson, A. M. (2024). Safeguards at a glance. Are the Monitoring, Reporting, Verification, and Grievance Redress Mechanisms of voluntary standards supporting community rights in REDD+? CIFOR. https://www.cifor-icraf.org/publications/pdf_files/Flyer/REDD-safeguards-8.pdf

Luttrell, C., Resosudarmo, I. A. P., Muharrom, E., Brockhaus, M., & Seymour, F. (2014). The political context of REDD+ in Indonesia: Constituencies for change. *Environmental Science & Policy*, 35, 67–75. <https://doi.org/10.1016/j.envsci.2012.10.001>

Marshall, C. (2023, November 9). Kenya's Ogiek people being evicted for carbon credits - lawyers. BBC News. <https://www.bbc.com/news/world-africa-67352067>

MSI Integrity. (2020). Not fit-for-purpose: The grand experiment of multi-stakeholder initiatives in corporate accountability, human rights and global governance. <https://www.msi-integrity.org/not-fit-for-purpose>

Mutabazi, K. D., George, C. K., Dos Santos, A. S., & Felister, M. M. (2014). Livelihood implications of Redd+ and costs-benefits of agricultural intensification in Redd+ pilot area of Kilosa, Tanzania. *Journal of Ecosystem & Ecography*, 4(2), 1000144. <https://doi.org/10.4172/2157-7625.1000144>

Nelson, P. J., & Dorsey, E. (2018). Who practices rights-based development? A progress report on work at the nexus of human rights and development. *World Development*, 104, 97-107. <https://doi.org/10.1016/j.worlddev.2017.11.006>

Obergassel, W., Peterson, L., Mersmann, F., Schade, J., Hofbauer, J. A., & Mayrhofer, M. (2017). "Human Rights and the Clean Development Mechanism: Lessons Learned from Three Case Studies." *Journal of Human Rights and the Environment* 8(1), 51–71. https://epub.wupperinst.org/frontdoor/deliver/index/docId/6662/file/6662_Obergassel.pdf

- Persha, L., & Andersson, K. (2014). Elite capture risk and mitigation in decentralized forest governance regimes. *Global environmental change*, 24, 265-276. <https://doi.org/10.1016/j.gloenvcha.2013.12.005>
- Poudel, M., Thwaites, R., Race, D., & Dahal, G. R. (2015). Social equity and livelihood implications of REDD+ in rural communities: A case study from Nepal. *International Journal of the Commons*, 9(1), 177. <https://doi.org/10.18352/ijc.444>
- Poudyal, M., Jones, J. P., Rakotonarivo, O. S., Hockley, N., Gibbons, J. M., Mandimbiniaina, R., ... & Ramamonjisoa, B. S. (2018). Who bears the cost of forest conservation?. *PeerJ*, 6, e5106. <https://doi.org/10.7717/peerj.5106>
- Poudyal, M., Ramamonjisoa, B. S., Hockley, N., Rakotonarivo, O. S., Gibbons, J. M., Mandimbiniaina, R., Rasoamanana, A., & Jones, J. P. (2016). Can REDD+ social safeguards reach the 'right' people? Lessons from Madagascar. *Global Environmental Change*, 37, 31-42. <https://doi.org/10.1016/j.gloenvcha.2016.01.004>
- Ratsimbazafy, L. C., Harada, K., & Yamamura, M. (2011). Forest conservation and livelihood conflict in REDD: A case study from the corridor Ankeniheny Zahamena REDD project, Madagascar. *International Journal of Biodiversity and Conservation*, 3(12), 618–630. <https://doi.org/10.5897/IJBC.9000062>
- Redvers, N., Chan, J., Odochao, S., Pratt, V., Sim, J., Gougsa, S., Kobei, D. M., & Willetts, L. (2025). Carbon markets: A new form of colonialism for Indigenous Peoples? *The Lancet Planetary Health*, 9(5), e421–e430. [https://doi.org/10.1016/S2542-5196\(25\)00086-5](https://doi.org/10.1016/S2542-5196(25)00086-5)
- Rich, B. (1994). *Mortgaging the Earth*. Earthscan Publications. <https://doi.org/10.1002/sd.3460030309>
- Saeed, A.R., McDermott, C., & Boyd, E. (2017). Are REDD+ community forest projects following the principles for collective action, as proposed by Ostrom? *International Journal of the Commons*, 11(1), 572–596. <https://doi.org/10.18352/ijc.700>
- Sarmiento Barletti, J. P., & Larson, A. M. (2017). Rights abuse allegations in the context of REDD+ readiness and implementation: A preliminary review and proposal for moving forward. Center for International Forestry Research (CIFOR). <https://doi.org/10.17528/cifor/006630>
- Sarmiento Barletti, J. P., Prouchet, L., & Larson, A. M. (2023). Rights-based approaches and Indigenous peoples and local communities: Findings from a literature review. *CABI Reviews*. <https://doi.org/10.1079/cabireviews.2023.0028>
- Satyal, P., Corbera, E., Dawson, N., Dhungana, H., & Maskey, G. (2020). Justice-related impacts and social differentiation dynamics in Nepal's REDD+ projects. *Forest Policy and Economics*, 117, 102203. <https://doi.org/10.1016/j.forpol.2020.102203>
- To, P., Dressler, W., & Mahanty, S. (2017). REDD+ for Red Books? Negotiating rights to land and livelihoods through carbon governance in the Central Highlands of Vietnam. *Geoforum*, 81, 163–173. <https://doi.org/10.1016/j.geoforum.2017.03.009>

Vanclay, F. (2017). Project-induced displacement and resettlement: From impoverishment risks to an opportunity for development? *Impact Assessment and Project Appraisal*, 35(1), 3–21.

<https://doi.org/10.1080/14615517.2017.1278671>

Wade, R. (1997). Greening the Bank: The struggle over the environment: 1970–1995. In Kapur, D., Lewis, J. P., & Webb, R. C. (Eds.), *The World Bank: Its first half century* (pp. 611–734), Brookings Institution.

<https://documents.worldbank.org/en/publication/documents-reports/documentdetail/313081468322727631>