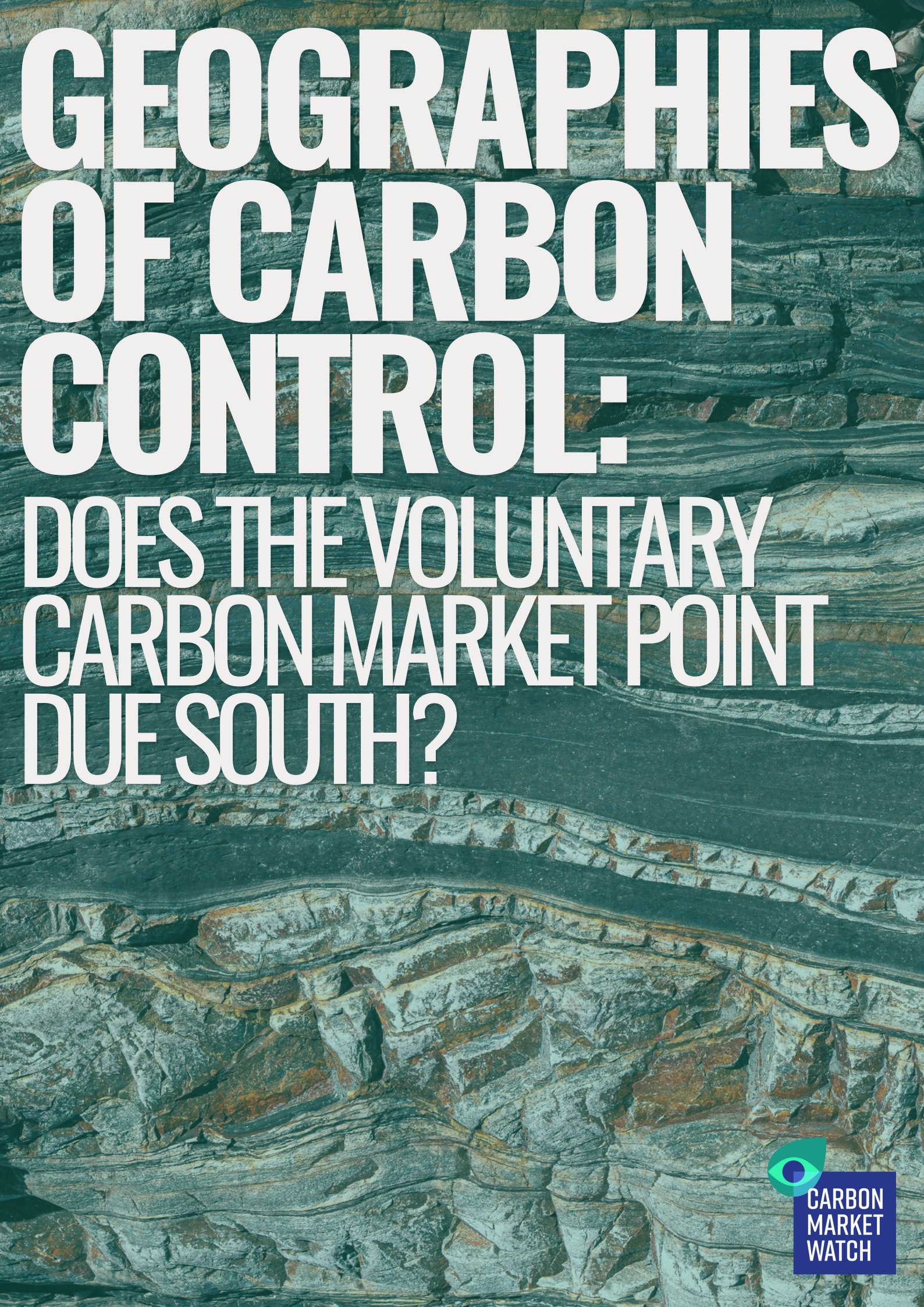
GEOGRAPHIES OF CARBON CONTROL:

DOES THE VOLUNTARY CARBON MARKET POINT DUE SOUTH?



CARBON MARKET WATCH

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EXECUTIVE SUMMARY

Carbon credit project developers and owners are predominantly based in high-income, highly developed countries, despite implementing projects in lower-income, less developed countries. Carbon Market Watch assessed 100 projects and found that less than one-third of them involve only regional participants, that is, from the region the project developer belongs to. Projects implemented in Africa have the highest levels of external management, as almost two-thirds of the sampled African projects are developed by entities headquartered outside the region. This creates an asymmetry of power in which those holding decision-making positions are far from the actual affected communities, raising additional concerns about how much of the financial benefits actually remain at the local level.

Information reported across project documentation is often vague and inconsistent, making it difficult to identify who actually participates and in what capacity. Carbon credit standards define unclear role categories for project participants, which is particularly evident in the catch-all 'other participants' designation. It ambiguously bundles consultants with implementation partners and investors.

Across the sample, a recurring network of project developers emerges in the Household & Community projects. This may limit opportunities for broader and equitable participation in this rapidly growing project category. These concerns are further amplified by the fact that many of these actors constitute multinational entities, raising questions about where financial benefits ultimately flow and who retains control over the projects.

Forestry & land use projects stand out for involving a large number of 'other participants', many of whom are based in countries of higher levels of development and income. The lack of clarity surrounding these actors' roles, coupled with their concentration in wealthier countries raises questions about the project value they capture and the power dynamics within these projects, particularly given that forestry projects are often implemented on Indigenous Peoples' or other forest dependent communities' territories.

To help address these issues, we have put together a set of recommendations for the carbon credit market, which include the following:

- Carbon market standards must
  - Strengthen transparency of reporting requirements for project participants in project documentation, particularly regarding their precise roles, responsibilities, and the locations of key decision-making entities, so as to eliminate broad and unclear categorisations of entities such as 'other participants'.
  - Mandate transparency in benefit-sharing arrangements, including by requiring developers to provide affected communities with upfront financial transparency on project costs and revenue distribution before any agreement is made. Developers must also update affected communities about costs and revenue distribution at least on a yearly basis once the project has started, which should be independently audited. If beneficiaries consent to it, the terms of benefit-sharing arrangements should also be disclosed (e.g. share of carbon credit revenue disbursed).
- The Integrity Council for the Voluntary Carbon Market (ICVCM) should adopt the recommendations of its sustainable development working group. These include, among other things, the need for communities to receive unbiased technical information and legal support and for project developers to provide full financial transparency to communities.
- Host countries of carbon credit projects should mandate transparent benefit-sharing, including by requiring the disclosure of all entities involved in a project and its cost structures to authorities, as well as requiring minimum revenue-sharing thresholds.

INTRODUCTION

The voluntary carbon market is projected to grow substantially by 2050. Many countries that have traditionally hosted large numbers of projects, particularly in Africa and Asia, are seeking to accelerate this expansion by developing governance frameworks and initiatives to become leading carbon market hubs.

Alongside these projections, the voluntary carbon market continues to be promoted as a mechanism capable of mobilising funds for climate action while supporting sustainable development in vulnerable and less affluent countries. While the environmental integrity of carbon credits has been a central focus of debates on the voluntary carbon market (VCM) since its emergence, increasing attention is now being given to the governance of carbon market projects and the networks of actors involved in their development and implementation. This sceptical examination is critical given the VCM's opaque financial flows and benefit-sharing mechanisms, weak grievance mechanisms and sometimes serious negative impacts on people.

This report builds on an earlier edition published in July 2024, 'Due South: Geographic disparity of project actors in the voluntary carbon market'. It examined the geographical distribution of project actors and their development and income profile across the VCM. It found a significant difference between the regions where the carbon projects for the VCM were located and the location of the headquarters of the companies leading them.

Building on a slightly larger and more regionally representative sample, this report enables a more granular analysis of regional participation patterns and differences across the selected project scopes. It examines the geographic allocation of key project participants and explores the broader range of functions performed by other entities involved in projects, often vaguely designated as 'other participants'.

Although most project documents do not disclose the distribution of revenues among participants and the underlying power dynamics, our analysis reveals a pronounced geographical and developmental mismatch between the locations where projects are implemented and those of the entities running them. Our report also uncovers a complex network of actors performing diverse yet important roles, many of which are described only superficially in publicly available documentation.

METHODOLOGY

For this study, the sample was constructed using data from the UC Berkeley Voluntary Registry Offsets Database (version v2026-02).

The sample consists of 100 high-credit-issuing active projects[1] within the Forestry & Land Use, Household & Community, and Agriculture scopes that issued credits between January 2020 and February 2026.

We selected projects from three scopes – Forestry & Land Use, Household & Community, and Agriculture – as they are among the most human-centred categories of carbon crediting projects. They rely extensively on interactions with Indigenous Peoples, local communities, landowners and small-scale producers. This report aims to examine participation patterns across project categories in which the involvement of local actors is not merely incidental but integral to the generation of credits. Therefore, these scopes provide a suitable setting for mapping the entities that play principal roles in project development and implementation in the VCM.

To strive for representativeness, the sample was constructed in two stages. First, the number of projects in each world region[2] was based on that region's share of total projects; i.e. the majority of projects are located in Africa, hence, our sample features proportionally fewer projects in Latin America. Second, within each region, the projects with the highest credit issuance[3] were selected. The resulting distribution across the three selected project scopes was then retained, as it roughly resembled the scope shares in the filtered population (for more information about the sample, please see the annex).

[1] Active projects are those that have issued credits between January 2020 and February 2026 and that were identified as being "registered" by carbon market standards through February 2026.
[2] We used the UN's classification of world regions, with two modifications: we split the Americas into "North America" and "Latin America and the Caribbean"; we then considered "North America and Europe" together as a new group.
[3] As of February 2026

Table 1: Project sample per region and scope

Region	Household & Community	Agriculture	Forestry & Land Use	Total
Africa	32	0	9	41
Asia	18	8	5	31
Latin America and the Caribbean	0	0	18	18
Europe and North America	0	3	6	9
Oceania	0	0	1	1
Total	**50**	**11**	**39**	**100**

In some regions, the share of projects within a given scope is so small that we did not include those projects in our sample. For example, the share of Agriculture projects in the African region is so small that we decided against artificially adding one to the sample.

The sampled projects originate from four carbon crediting standards: Verra, Gold Standard, the American Carbon Registry, and ART. They were not deliberately selected; rather, they emerged after selecting the highest-issuing registered projects across the selected regions and project scopes, as outlined above.

For each project, information was collected from publicly available documentation on the registries' websites regarding the entities involved, their locations, and the roles they performed. The analysis focuses on the entities directly involved in the implementation and management of the sampled projects, namely project developers, project owners and 'other participants'. Some of the analysed projects have undergone changes in project developers or owners, often due to the transition from the Kyoto Protocol's Clean Development Mechanism (CDM) or the bankruptcy of the original entities. In such cases, the initial developer or owner has been recorded for the purposes of the analysis. Validation and Verification bodies (VVBs) are excluded, as their role is limited to the assessment of projects rather than their implementation, and there is only a small pool of operating VVBs across the whole of the market, which are commonly concentrated in hubs in fixed places.[4] Monitoring bodies are also excluded, as this function is predominantly performed by project owners across the sample.

[4] Preliminary findings also indicate disparity in the geographic distribution of VVBs: for instance with Africa relying primarily on international or non-African VVBs for potentially as much as 90% of verification activities, according to Perspectives Climate Group.

We classified the countries according to two internationally recognised indicators: the United Nations Human Development Index (UN HDI) and the World Bank Income Group classification. Under the UN HDI, countries were categorised as having very high, high, medium or low human development, while the World Bank classification distinguishes between high, upper-middle, lower-middle and low-income economies[5].

The findings presented below examine the geographic, developmental, and income disparities between the entities performing central project roles and the locations where projects are implemented. We also assess the consistency and completeness of the project participants' documentation. Our analysis raises the question of which participants are likely to retain the largest share of the project's revenues, and whether there is a geographical trend.

[5] The UN HDI measures a country's overall level of human development based on three key dimensions: health and life expectancy, access to education, and standard of living. The World Bank's classification of economies into income groups is based on the previous year's Gross National Income (GNI) per capita, calculated in US dollars using the Atlas method.

DEFINING PROJECT PARTICIPANTS

To maintain consistency with the 2024 analysis, this report adopts the same definitions of project participants. We did not assess Monitoring Bodies or VVBs.

Project Developer: The project developer is an individual or organisation primarily responsible for planning, executing, and completing a project. It manages day-to-day operations, coordinates various aspects, and ensures the project meets its objectives.

The role also involves overseeing project design and implementation, creating project documentation, and ensuring compliance with regulatory and quality standards.

Project Owner: The project owner is the organisation or entity that holds legal ownership of the carbon assets generated by a project.

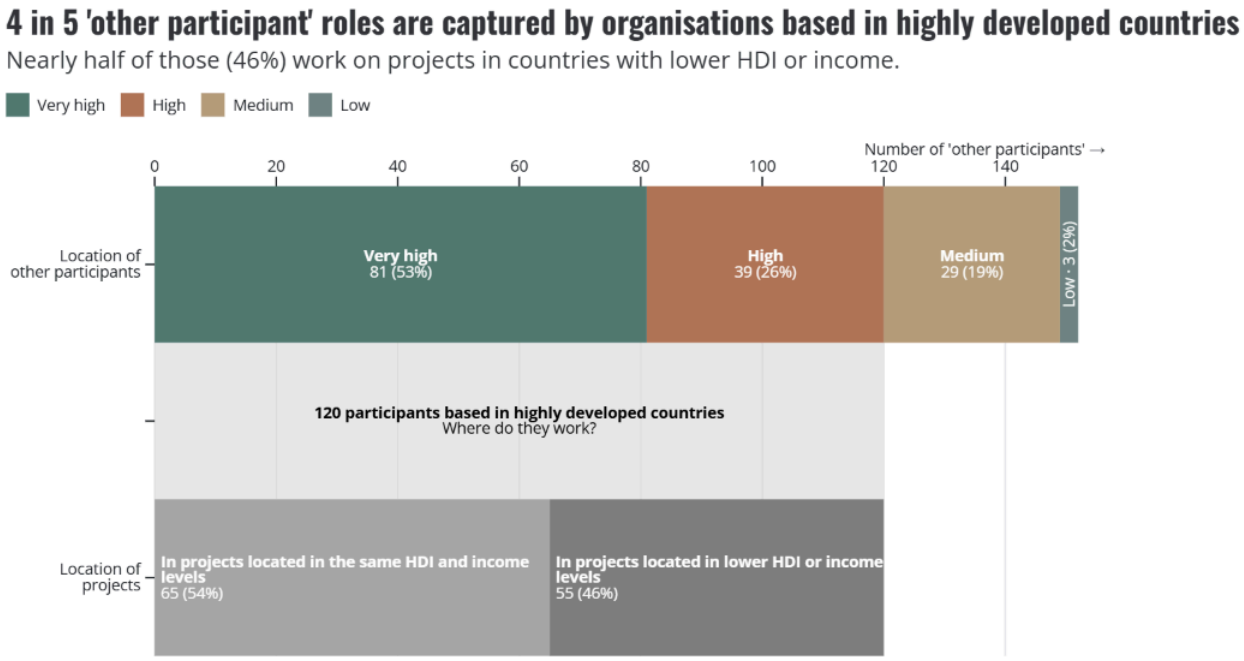
Other Participant: These are organisations or entities which assist in the development of the project. They can provide technical, strategic, or administrative support. They are typically involved as external consultants in the project.

FINDINGS

Beyond developers and owners: Who are the 'other participants'?

In most projects, 'other participant' roles are captured by organisations based in highly developed countries, not the local countries where projects are implemented. The majority of the 152 instances of 'other participant' roles identified in the sample are performed by entities headquartered in countries classified as having a very high or high Human Development Index (HDI). Moreover, almost half of the roles performed by very high or high HDI entities are associated with projects implemented in countries with lower HDI and/or income levels. Figure 1 illustrates this pattern.

Figure 1: Allocation of 'other participant' roles



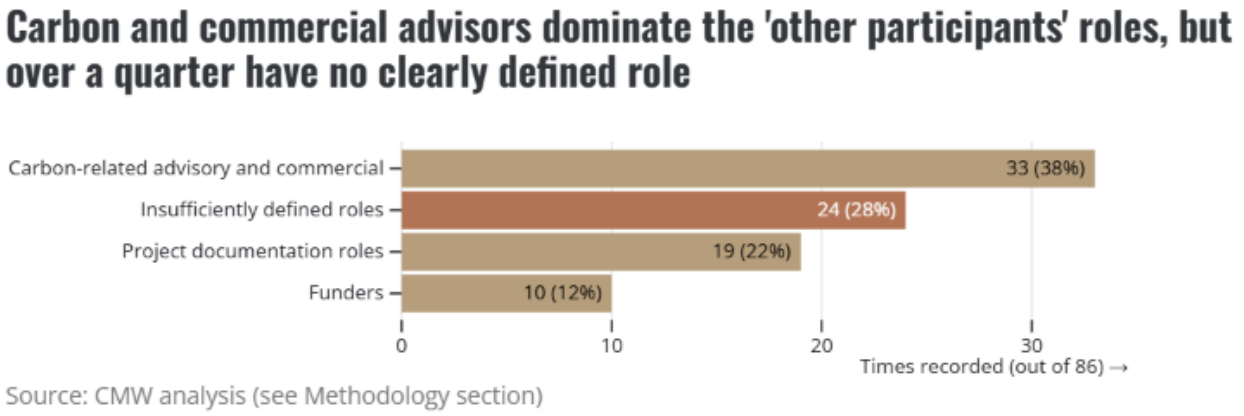
Source: CMW analysis (see Methodology section)

Identifying the roles of 'other participants' proved challenging. Although registry standards provide a dedicated section for reporting 'other entities involved', this section was frequently left incomplete. Instead, references to additional participating entities were scattered throughout project documentation, often accompanied by only limited or general descriptions of their functions in the project. As a result, determining the precise role of all project participants was often difficult, raising broader concerns around accountability and the opaque distribution of decision-making power within projects.

Unpacking the 'other participants' category

A notable finding is the considerable diversity of roles grouped under the umbrella category of 'other participants'. The absence of consistent terminology across project documentation made it difficult to establish clear role categories. Nevertheless, recurring keywords and descriptions enabled the identification of several broad functional groupings.

Figure 2: Frequency of most prevalent 'other participant' types



Note: Figure 2 includes only the most frequently identified categories of 'other participant' roles in the sample. However, the project documentation revealed a much broader range of functions, including legal advisory, security and anti-poaching roles, cookstove manufacturers, recruitment staff and others. Many of these roles appeared only sporadically across the sample, and others were specific to particular project scopes; therefore, they are not included in this figure.

Insufficiently defined roles

Insufficiently defined roles occur frequently enough to merit attention. Several participants were assigned only broad or generic role descriptions, such as 'consultant', 'programme partner', 'support in development', or 'technical assistance', making it difficult to determine the precise functions they perform. These role descriptions were identified 24 times across the sample.

Carbon-related advisory and commercial services

One prominent category is comprised of entities that provide carbon-related advisory and commercial services, including roles described as 'carbon consultant', 'carbon accounting', 'offset developer', 'carbon advisor', 'carbon trading', 'development and management of the carbon component of the project', 'baseline development', 'selling and marketing of carbon credits', and 'advice on methodological review'. Across the sample, these functions were recorded 33 times.

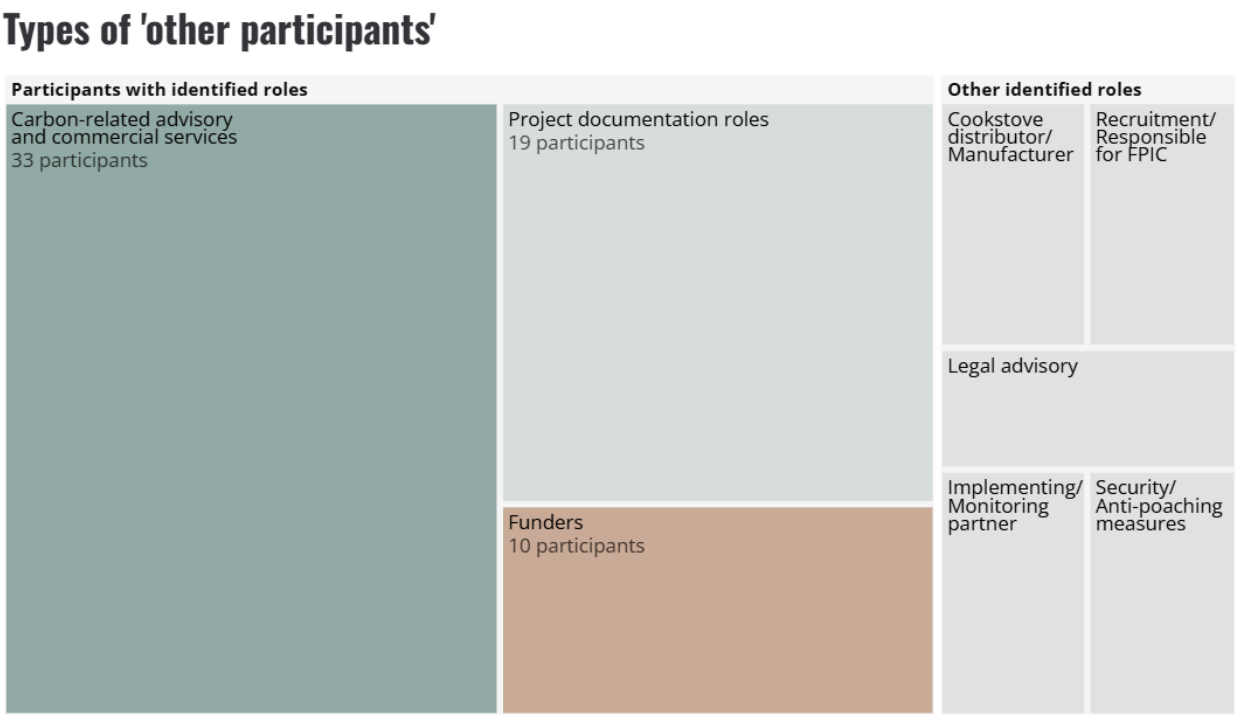
Drafting/reviewing/designing project documentation

Another category of roles identified comprises entities involved in the drafting, design or review of project documentation that are not the project developer or project owner. Our sample suggests that these key technical duties are frequently done by organisations based in wealthier countries. Across the sample, these roles were recorded 19 times.

Funders

Our analysis also finds that several other actors are involved in financing carbon crediting projects, in addition to the developers and owners. In our sample, explicitly identified finance providers are overwhelmingly entities based in highly developed countries. Across the sample, 10 projects identified an actor whose role description was referred to as the provision of 'financing' or 'funding'.

Figure 3: Types of 'other participants'



Source: CMW analysis (see Methodology section)

Vague category of 'other participants' obscures accountability and scrutiny.

The findings above add important nuance to the understanding of project participation in the voluntary carbon market. Discussions of project governance typically focus on project developers and project owners as the principal actors. However, the diversity of roles

identified under the umbrella category of 'other participants' suggests that a broader network of actors perform specialised technical, commercial, financial, and advisory functions that likely play a significant role in the development and operation of carbon credit projects.

The fragmented and inconsistent reporting of these actors makes it difficult to determine the precise nature of their responsibilities and, consequently, the extent to which they benefit monetarily from these projects. This lack of transparency regarding the relationships and financial arrangements between project participants has been repeatedly highlighted as a major governance challenge for the voluntary carbon market.

Against this backdrop, the findings presented in this section have broader implications.

First, the inconsistent and incomplete reporting of 'other participants' obscures a network of actors whose involvement appears considerably more significant than the publicly available project documentation suggests. Without clear records of who the actual participants involved in a project are and what their respective roles entail, it is very challenging to verify whether participants have the relevant expertise or if there are any conflicts of interest. It can also hamper efforts to hold stakeholders to account for a project's outcomes, especially if things go wrong. Overall, the unspecificity around the 'other participants' label creates significant accountability gaps.

Second, when participant documentation is scattered, the real power dynamics within the projects are unknown. The lack of clarity regarding 'other participants' functions makes it difficult to track which actors influence decisions, profit financially, and control the project's direction.

Recent research examining global value capture in voluntary carbon markets provides additional insights into the potential economic significance of some of the roles identified in the sample. According to the study, entities providing carbon market services capture a fifth to over a third of project carbon revenues, a share often comparable to that received by project owners. The same study also indicates that project funders may receive a share of carbon revenues, although the proportion varies by entity type and is insufficiently documented.

Therefore, the relative concentration of these 'other participants' specialised technical, advisory, and financing roles headquartered in countries with high levels of development raises important questions. Primarily, what share of the revenue generated by these projects is allocated to local stakeholders, or is it concentrated within these international entities?

While the available evidence from the literature and our analysis does not allow definitive conclusions regarding the actual distribution of revenues, the findings cast doubt on whether enough of the carbon revenues are reaching the countries with lower development and income levels where the projects are located, due to the concentration of key project actors outside these countries.

Lastly, as previously stated, carbon crediting standards provide a specific section for the documentation of 'other participants'; however, it was scarcely filled in, and most of the relevant information was scattered across the documents. This lack of compliance suggests either weak enforcement mechanisms or intentional opacity.

Global trends

How dispersed are the project participants?

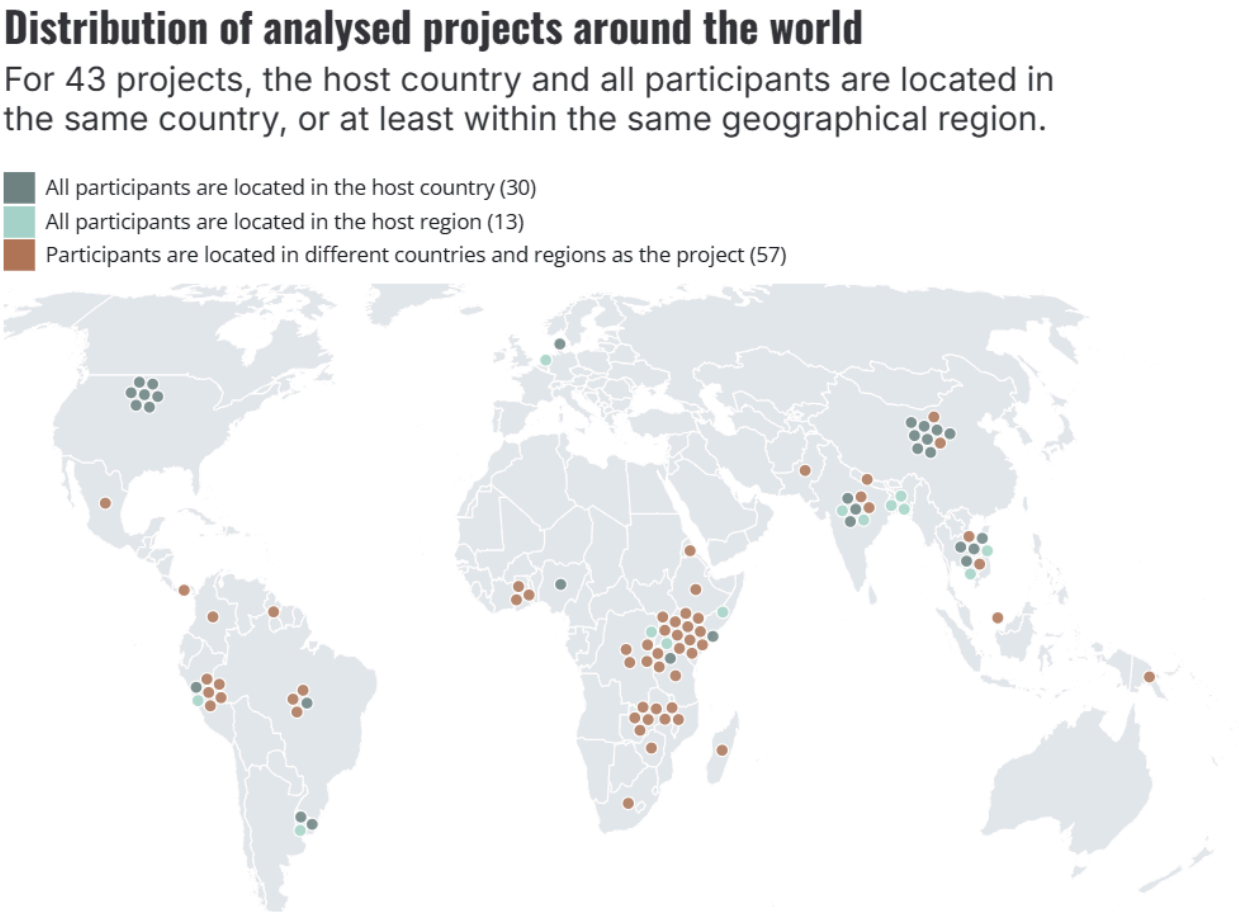
Nearly half of the projects we analysed are regionally concentrated. That means all project participants come from either the host country or at least the region where the project takes place. This is illustrated by the fact that for 43 projects, the host country and all participants are located in the same country (30), or at least within the same geographical region (13), as Figure 4 below shows. However, it is worth examining where this regional or country-level concentration is most pronounced.

The majority of projects that are concentrated in the same country or region are located in very high or high human development territories. For example, of the 30 all-domestic projects, 8 are located in China, 7 in the United States, 4 in Latin American countries with a higher development classification, 1 in Europe, and only 6 are located in countries with medium/low HDI or lower-middle/low World Bank income grouping. The remaining 4 projects are located in Vietnam, which forms an exception as it is classified as having high HDI but lower-middle income.

13 projects have their participants headquartered in their implementation region, but not in the same country, only in 4 cases are both the project's and the participants' locations of lower development and income level. These projects are found in Somalia, Uganda, and Bangladesh. Notably, of the 7 projects implemented in Asian countries, 5 have at least one participant headquartered in Singapore, a country with a very high HDI and high income, while being implemented in countries with relatively low HDI and World Bank income levels, such as Cambodia, Bangladesh, and India.

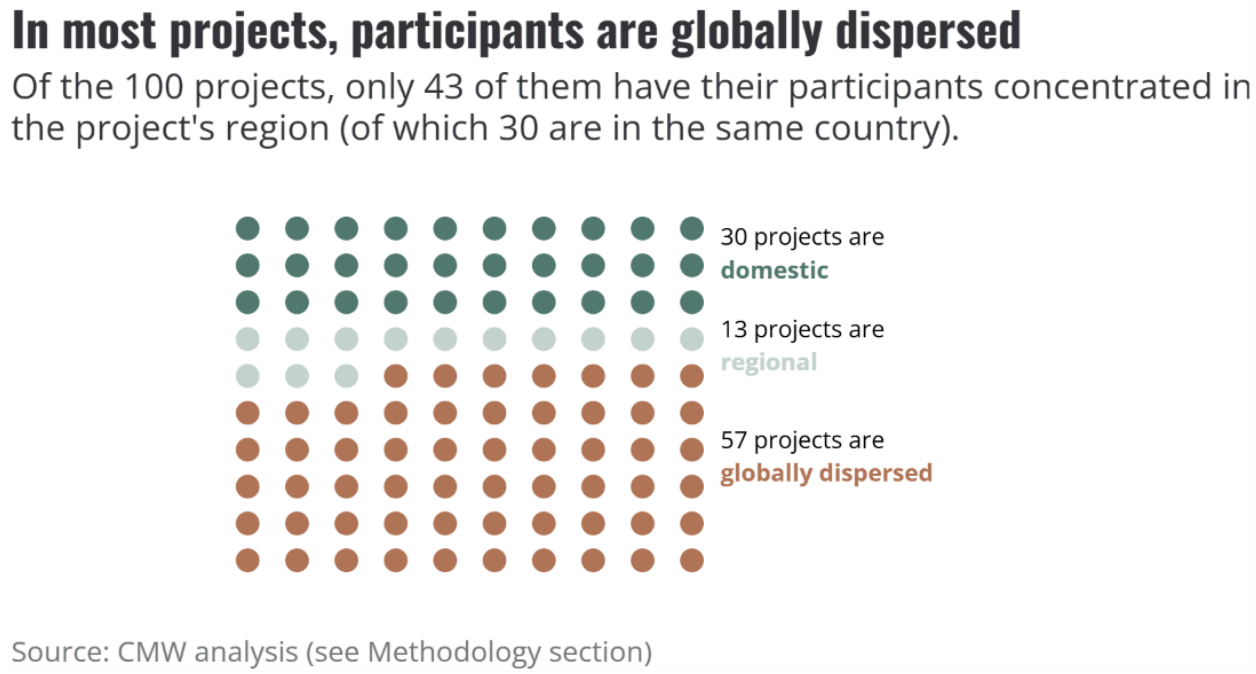
For the remaining 57 projects, participants are located in different countries and regions than the projects, a pattern that will be explored in greater detail in the following sections.

Figure 4: Distribution of analysed projects and their participants around the world.



The identification of projects with a concentration of participants at the domestic or regional level in higher development and income levels might suggest that retaining central project functions within the region is a privilege largely reserved for countries with greater technical expertise in carbon markets and greater financial resources. At the same time, these patterns raise the possibility that projects implemented in smaller or less resource-rich countries may reinforce existing economic and power imbalances, allowing entities headquartered in stronger economies to dominate central project functions, thereby marginalising local actors.

Figure 5: Extent of domestic, regional and intercontinental participation in projects



Source: CMW analysis (see Methodology section)

Development and income profiles of project participants

Project-managing actors are predominantly located in very high or high human development and income countries. Among the 96[6] distinct project developers identified, 42 are headquartered in countries with very high human development, and 20 are based in high human development countries. Together, they account for approximately 65% of all project developers. The same trend is also reflected in income classifications, with nearly two-thirds of project developers headquartered in high- or upper-middle-income countries.

Likewise, of the 94 entities identified as project owners in the sample, approximately 70% are headquartered in countries with very high or high HDI and high or upper-middle income.

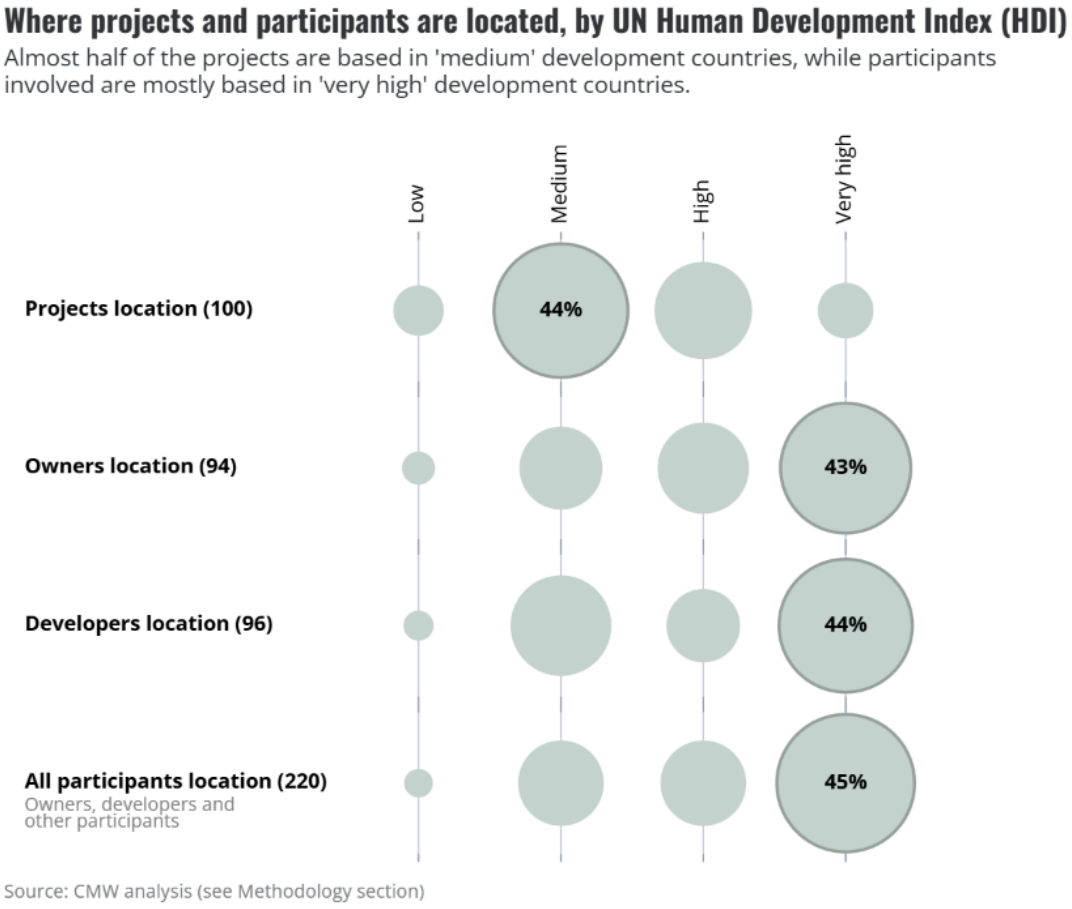
'Other participants', covering a wide range of tasks and profiles, predominantly come from very high or high human development and income countries. More than 76% of the 126 distinct entities identified as 'other participants' across the sample are headquartered in countries classified as having very high or high human development and high or upper-middle income.[7]

[6] Our sample consists of 100 projects, which were developed by 96 different project developers.
[7] The 'other participant' roles identified in the sample are highly heterogeneous, encompassing a diverse range of functions, profiles and responsibilities. More on the "Beyond developers and owners: Who are the 'other participants'?" section.

While project participants are concentrated in high-development and high-income countries, most projects are implemented in countries with lower development and income levels. In the project sample, 44 projects are in medium human development countries and 12 in low human development countries, together representing 56% of all sampled projects.

The figure below illustrates the disparity between the countries where projects are developed and where participants' headquarters are located. While most projects are implemented in medium HDI countries, participants across all categories predominantly come from very high HDI countries.

Figure 6: Overall development level of countries where participants and projects are located



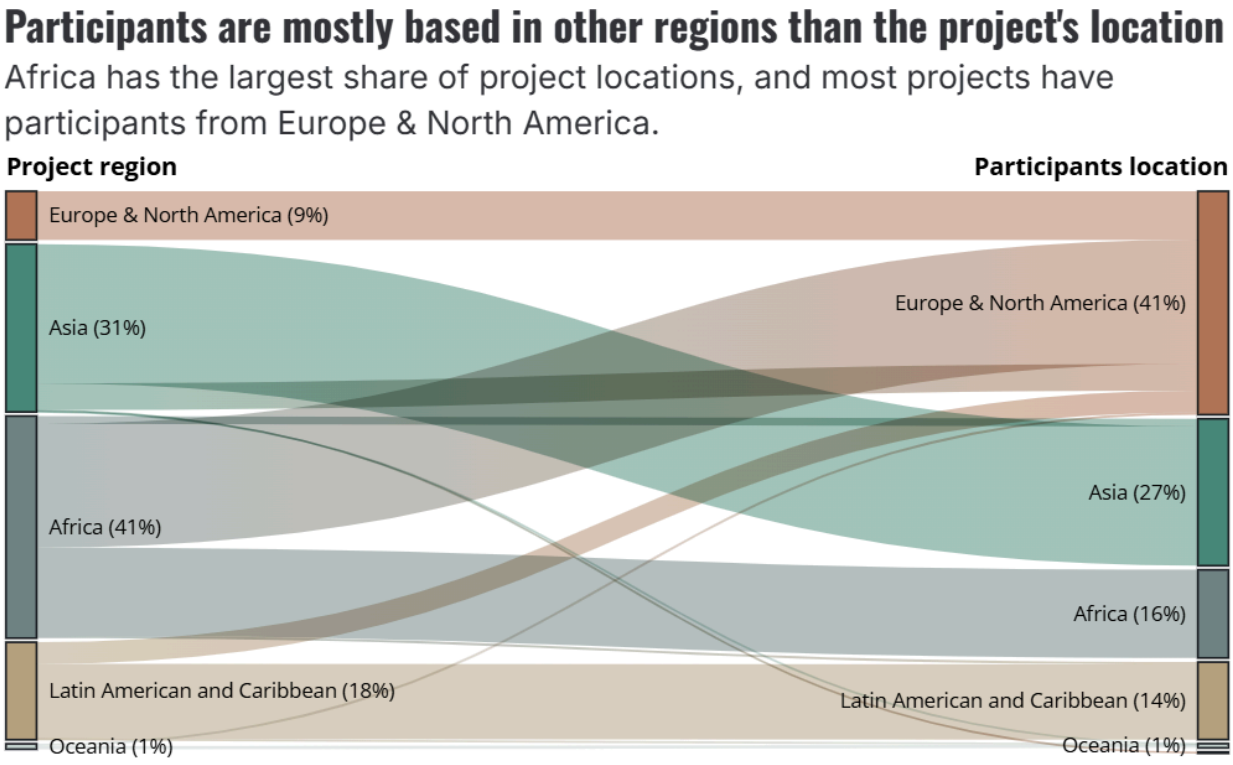
Regional trends

Having examined the development and income profile of project host countries and participating actors, we now explore where participants are based in relation to the projects themselves, and whether there are variations across the regions analysed.

Each region shows distinct project participation patterns. For instance, in Africa, projects are largely managed by entities based outside the region, whereas in Europe and North America, the project managers and implementers are always based there. Where participants remain within the same region, we assess whether disparities exist in development and income levels between host countries and participants. This reveals top-down project management trends.

A recurring pattern emerged in which actors from higher-development and income countries implement projects in countries with lower levels of development and income, and never vice versa. This asymmetry likely reflects differences in technical expertise, institutional capacity, and financial resources, which can limit the ability of entities from less affluent countries to participate in projects in more resource-rich countries.

Figure 7: Geographic allocation of projects and project participants



Source: CMW analysis (see Methodology section)

These patterns do not, in themselves, provide insights into the distribution of the economic value generated by the projects, but when paired with opaque project documentation, they do signal an oversight problem. The general lack of transparency in financial flows raises concerns about whether Global North-led VCM projects truly mobilise meaningful levels of finance for developing country projects, as is often advertised. While it is possible that developers and owners direct a large share of revenues to the project and people on the ground, the lack of transparency suggests that this may not be happening equitably, if at all.

Africa

There is a pronounced discrepancy between the countries in which projects are implemented and those where the entities occupying central project roles are headquartered. Africa hosts the largest number of projects within our sample and has the lowest overall levels of human development and income. The continent also records the highest number of project participants headquartered outside the region, most often in the United States and Europe, as shown in Figure 8 below.

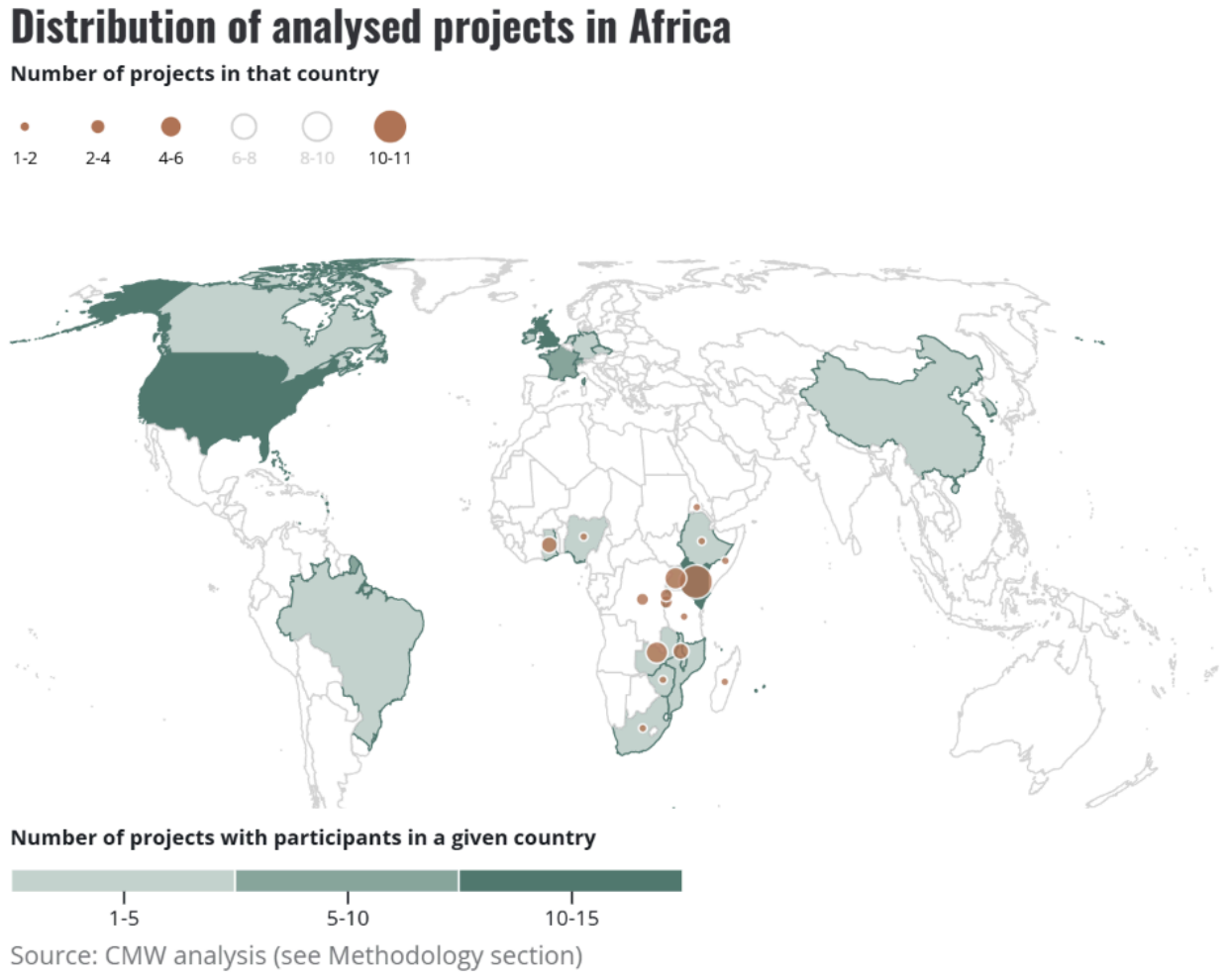
More than half of the African projects have developers and owners headquartered in countries outside the continent with higher levels of human development and income. Of the 41 African projects included in the sample, 24 have project developers, and 25 have project owners headquartered outside of Africa, in countries classified as having very high HDI and high income.

In the remaining 16 projects, where these central roles are performed by entities headquartered within Africa, no marked disparity is observed between the development profiles of the project locations and those of the participating entities. These projects are implemented in countries classified as having medium or low human development and involve project developers and owners headquartered in countries with comparable levels of human development.

'Other participants' are mostly headquartered outside Africa, with almost every project having at least one from a different region. Of the 19 African projects which had 'other participant' roles, 18 have at least one of them based outside the continent, mainly in countries with very high HDI[8].

[8] Of the 'other' entities headquartered outside Africa, one is in Brazil (high HDI - upper-middle income) and the rest in countries with very high HDI and high income.

Figure 8: Distribution of African projects and their project participants



Note: For example, in the figure above, there are 11 African projects in Kenya, and 15 African projects have participants based in the United States.

Asia

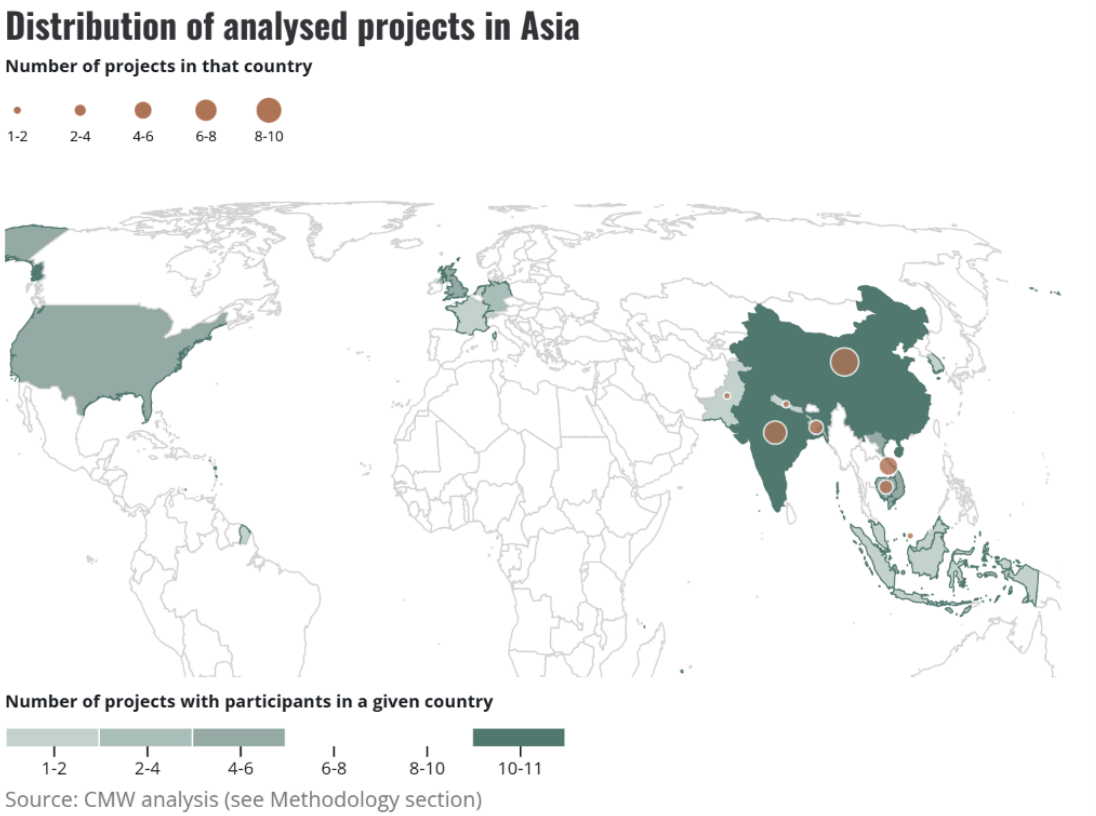
The sampled projects in Asia exhibit a more balanced regional distribution of participating entities, reflecting the wider range of development and income levels across the countries hosting projects. Of the 31 projects included in the sample, 25 have both project developers and owners headquartered in Asia, while only 6 involve at least one project developer and owner headquartered outside the region.

A further notable finding is the balanced development profile of both the project locations and the central project participants. Of the 31 projects, 16 are in countries classified as having high or very high HDI, while the remaining 15 are located in countries with medium or low HDI. A similar balance is observed among project developers headquartered in Asia, with approximately half in countries with high or very high HDI, and the other half in

countries with medium or low HDI. A similar pattern is broadly reflected among Asian project owners: approximately 60% of whom are headquartered in countries with high or very high HDI, and the remaining 40% in countries with medium or low HDI.

This overall balance in the HDI levels of the participants in Asian projects can be observed in Figure 9 below. The countries with the biggest participation in Asian projects are India and China, which are both located on the continent and have different HDI and income levels. India has a medium HDI and lower-middle income, while China has a high HDI and upper-middle income.

Figure 9: Distribution of Asian projects and their project participants



Note: For example, in the figure above, there are 10 Asian projects located in China, while there are 11 Asian projects with participants based in China and 5 Asian projects with participants based in the United States.

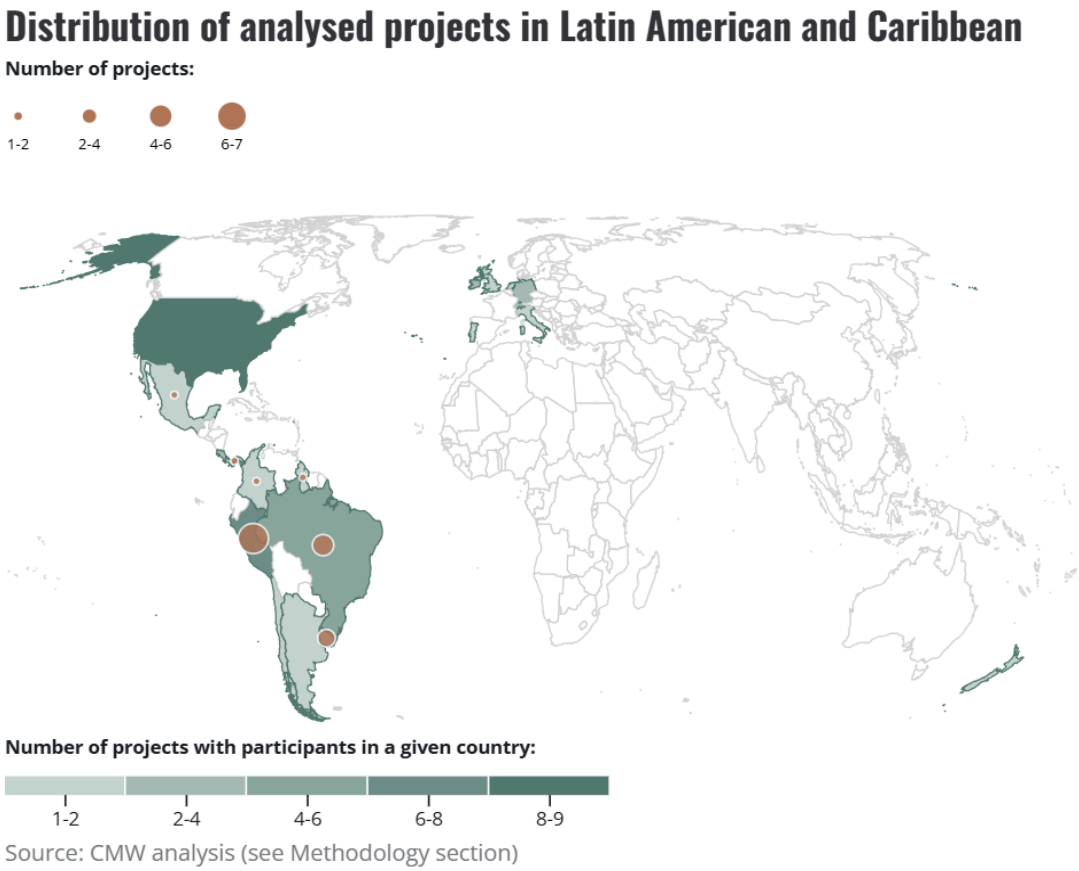
Latin America & Caribbean

The findings from the sampled Latin American & Caribbean projects indicate a relatively high degree of regional participation, and a relatively high number of participants from the United States, as shown in Figure 10 below. Around two-thirds of projects have project developers and owners headquartered in the region.

However, Latin America & the Caribbean is predominantly composed of countries with relatively higher levels of development and income. Of the sample, all project developers and owners are headquartered in countries classified as having a very high or high HDI and high or upper-middle income.

'Other participant' roles were identified a total of 64 times in 16 of the sampled Latin American & Caribbean projects. Of these 16, 9 have at least one 'other participant' headquartered outside the region. However, role-level analysis reveals a higher concentration within the region than the project-level figure 10 below suggests. Of the 64 'other participant' roles, only 17 are performed by entities headquartered outside the region. As with project developers and owners, it is worth noting that all the 'other participant' roles are headquartered in countries classified as having very high or high HDI and high or upper-middle income.

Figure 10: Distribution of Latin American and Caribbean projects and their participants



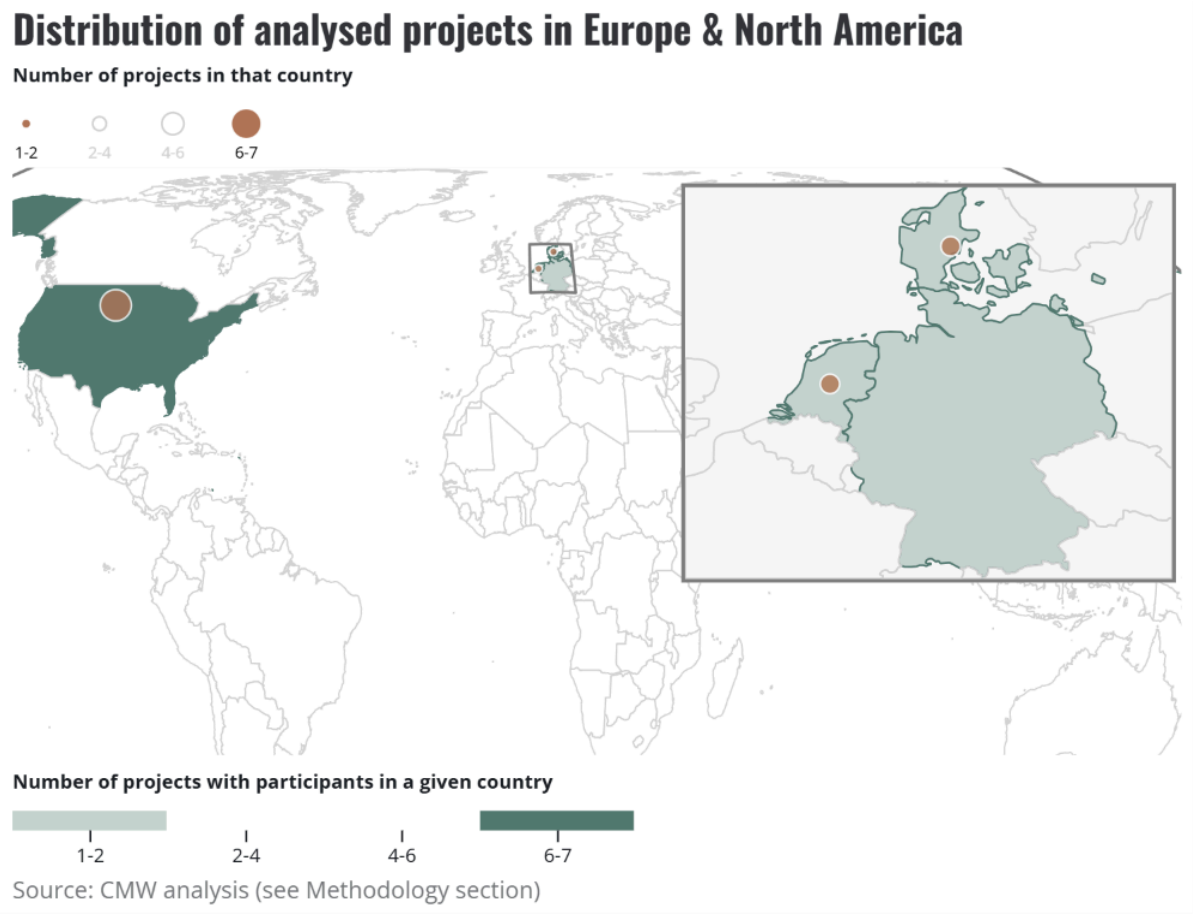
Note: For example, in the figure above, there are 7 projects in Peru, and 9 projects with participants based in the United States.

Europe & North America

The sampled projects in Europe & North America exhibit a complete concentration of the central project roles within the region, as illustrated in Figure 11. All the projects and their respective developers, owners, and 'other participants' of this region are headquartered in countries classified as having very high HDI and high income.

While entities headquartered in countries with very high HDI and high income commonly occupy central roles in projects implemented in countries with lower levels of human development and income, the reverse pattern never occurs in our sample. Figure 7 above illustrates this trend, as it depicts that European and North American participants (very high HDI, high income) are present, in one way or another, across the whole sample, while African participants (Medium/low HDI, lower-middle/low Income) are exclusively concentrated within the African region.

Figure 11: Distribution of European and North American projects and their project participants



Note: For example, in the figure above, there are 7 projects in the United States, all with participants based there.

Scope Specific Findings

Our sample provides insight into the participation patterns in Forestry & Land Use and Household & Community projects.

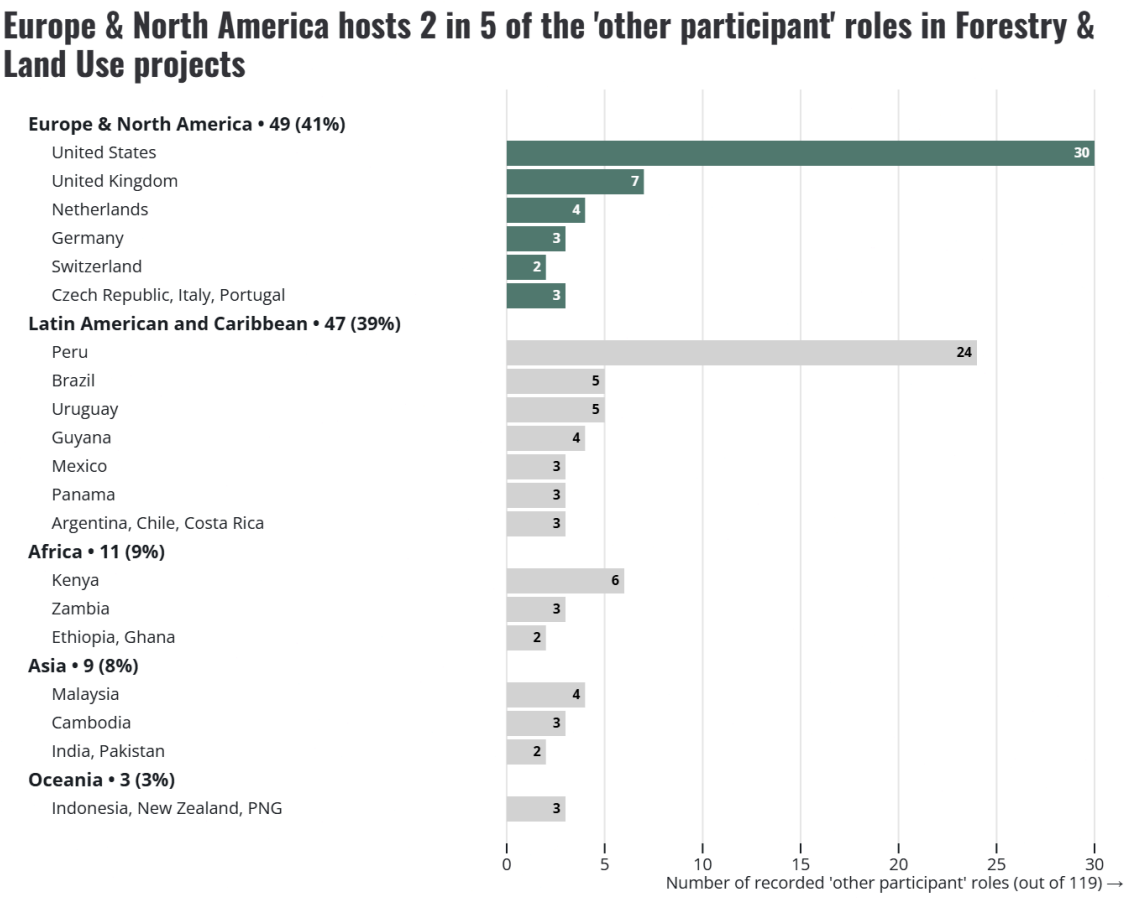
Forestry & Land Use

Forestry & Land Use projects were included in the sample as they are among the most established types of voluntary carbon market projects and involve a significant human dimension in their implementation. They aim to mitigate climate change by increasing carbon storage in forests and soils while avoiding emissions from land-use change through activities such as forest conservation, reforestation, and afforestation. Our sample includes 39 such projects[9], distributed across Latin America and the Caribbean (18), Africa (9), Europe and North America (6), Asia (5) and Oceania (1).

This scope contained the highest number of 'other participants'. While the majority of the entities in these roles are headquartered in countries with very high or high HDI, examining the specific countries where they are based provides further insight into this concentration.

[9] The 39 Forestry & Land Use projects consist of 22 REDD+ projects, 1 Jurisdictional REDD+ project, 7 Afforestation/Reforestation, 6 Improved Forest Management projects, 2 Wetland Restoration projects, and 1 Sustainable Grassland Management project.

Figure 12: Geographic allocation of ‘other participants’ in Forestry & Land Use projects



Source: CMW analysis (see Methodology section)

A notable tendency among Forestry & Land Use projects is the frequent involvement of ‘other participants’ headquartered in countries with higher levels of development and income than the countries where projects are implemented. As illustrated in the figure above, entities headquartered in the United States and Peru dominate this category, appearing 30 and 24 times respectively as ‘other participants’ in Forestry & Land Use projects. Every recorded case of ‘other participants’ in the Peruvian samples are from projects based in Peru, a country classified as having a high HDI and being upper-middle income. This reflects the high concentration of domestic participants observed across Latin American projects.

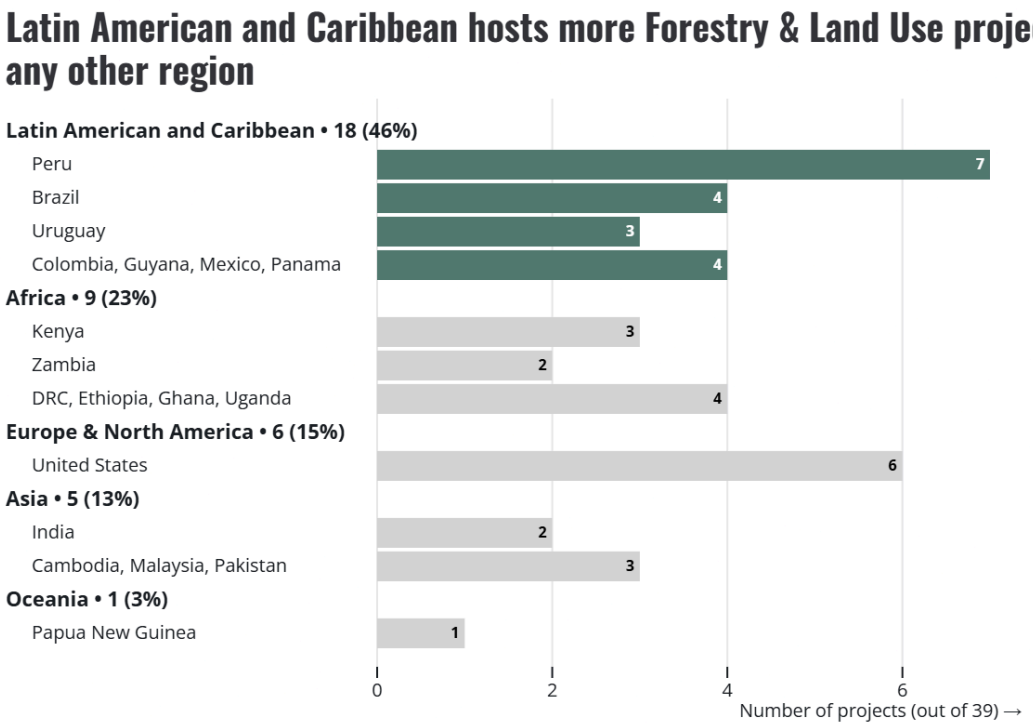
Notably, in 20 of the 30 instances where a United States-based entity was identified as an ‘other participant’, the project was implemented in a different country with at least one of the two indicators (HDI or income) lower than that of the United States. Similarly, all 18 occurrences involving European entities relate to projects implemented outside Europe, in

countries with at least one of these two indicators lower than that of the participant's headquarters country.

This distribution stands in marked contrast to the geographical locations of the projects themselves (see figure below), as the majority of Forestry & Land Use projects in the sample are implemented outside Europe and North America.

These findings suggest that specialised functions are geographically concentrated in a limited number of countries. The prominence of 'other participant' entities headquartered in the United States, Peru, the United Kingdom and European countries indicates that technical, advisory, and other supporting roles are not evenly distributed across the regions where projects are implemented, but instead remain concentrated in a relatively small number of established carbon market hubs.

Figure 13: Locations of Forestry & Land Use projects



Source: CMW analysis (see Methodology section)

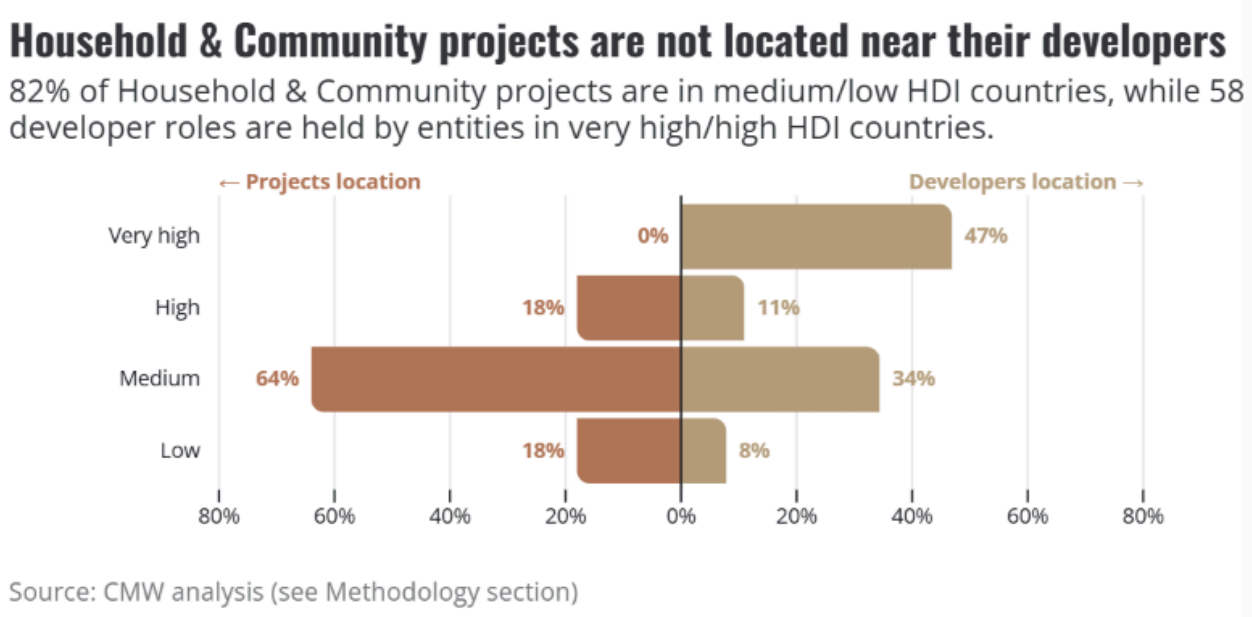
Household & Community

Household & Community projects aim to reduce greenhouse gas emissions by introducing cleaner household technologies that provide local communities with other benefits, like improved water and energy access. Replacing inefficient cookstoves with cleaner, more

efficient ones is one of the main project types within this scope. Household & Community projects account for half of the projects in the global sample, reflecting the rapid expansion of the scope, particularly in Africa.

Of the 50 Household & Community projects analysed, 41 were implemented in countries with medium or low HDI, and 46 were located in lower-middle-income or low Income countries. There were 64 project developer roles identified and 42 distinct entities in these roles, either as Coordinating and Managing Entities (CME) or Voluntary Project Activity (VPA) Implementers.[10] 37 of the 64 project developer roles were held by entities headquartered in countries with very high or high HDI, while 33 were headquartered in high or upper-middle-income countries.

Figure 14: Project locations vs Participants' locations in Household & Community projects

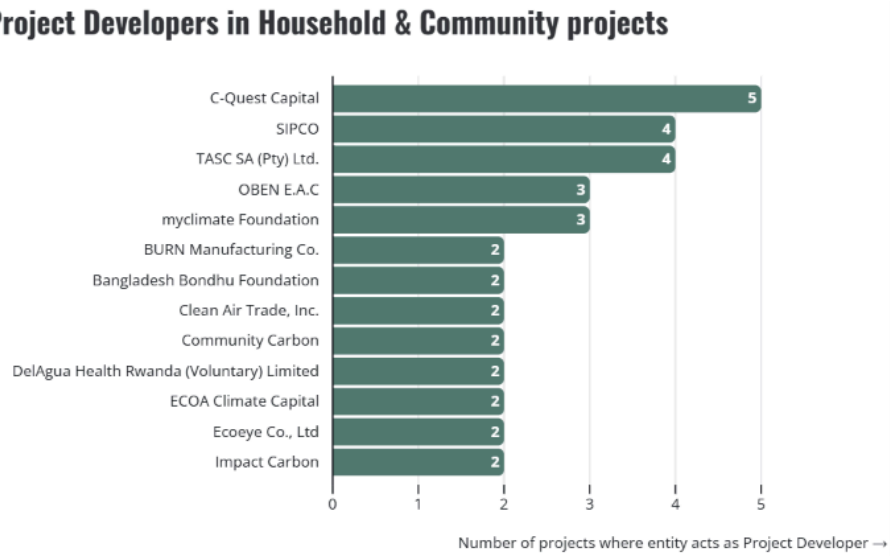


Source: CMW analysis (see Methodology section)

In addition, a small number of entities develop most Household & Community projects in our sample. As shown in the figure below, 13 entities, out of the 42 distinct entities that have been identified as project developers in this scope, have developed more than one project in our sample. Among them, C-Quest Capital appears most frequently, having developed 5 projects, followed by The African Stove Company Ltd. and Sustainability Investment Promotion and Development Joint Stock Company (SIPCO), each of which developed 4 projects. The majority of the projects developed by these recurring entities are clean cookstove distribution projects. There are only 5 exceptions: four clean water projects and one bundled energy efficiency project.

[10] The CME is the entity that communicates with the registry on all matters related to the project, while the VPA implementer is the entity responsible for the management and operation of the Voluntary Project Activity.

Figure 15: Recurring developers in Household & Community projects



Determining where these entities are ultimately headquartered, however, proved considerably more complex. In many cases, the location listed as the entity's address in project documentation differs from the official company's address or reflects only one entity within a broader corporate structure.

This complexity is illustrated by several of the largest project developers identified in the sample.

- C-Quest Capital, which filed for bankruptcy in a US court in 2025 following a string of controversies involving many of its projects, is identified in all project design documents of the 5 projects it developed in our sample as being located in Malaysia, whereas the company's headquarters were located in the United States.
- Likewise, The African Stove Company Ltd. is listed by a Gold Standard project in Kenya as being based in Jersey, United Kingdom, while a Verra project in South Africa lists the company's South African department as the project developer.
- Similarly, BURN Manufacturing Co. is listed in a Gold Standard project in Somalia as being located in the United States, whereas the company's website maps its headquarters in Kenya.
- In addition, recurring project developers appeared to be connected through corporate affiliations that were not always clearly identifiable. For instance, ECOA Climate Capital, recorded as a project developer in 2 projects in our sample, is listed[11] in the Gold Standard Registry as based in Mauritius, and has been identified as the "carbon financing arm" of BURN Manufacturing Co.

[11] See the document entitled "Required (09JUNE2023_V4.8-Project-Design-Document- BURN 5642 transition_CL.pdf)" on the linked page.

The inconsistent disclosure in project documentation regarding the headquarters of a company versus its subsidiary or partner does not suggest that wrongdoing occurred in the cases of C-Quest Capital, the African Stove Company, or Burn. The inconsistent information can be due to differing procedures between carbon market standards, or insufficient guidance regarding disclosure of project developers. Ultimately, this makes it difficult to get an accurate understanding of the main developer involved in a project, especially when it's a multinational company with subsidiaries and partner organisations spread across the globe.

The repeated presence of the same project developers within the Household & Community scope, predominantly across multiple cookstove distribution projects, shows that project development is concentrated among a relatively small group of companies. This appearance of well-established developers in many projects is a recognised feature of the VCM. Although the Household & Community subset analysed comprises only 50 projects, it nevertheless reflects this broader market trend.

This concentration of the same developers is particularly pronounced in the rapidly expanding cookstove project category. While this pattern may be explained by the specialised technical and operational expertise required to implement clean cooking technologies at scale, it also raises questions about the extent to which opportunities to develop these projects are solely consolidated among a relatively small group of companies.

The examples presented above illustrate only part of the complexity involved in mapping the relationship between different project owners, developers, and their partners or subsidiaries involved in managing Household & Community projects. They also demonstrate that relying exclusively on registry documentation may obscure the corporate relationships between participating entities. This makes it considerably more difficult to determine where decision-making authority, carbon rights, and the economic value generated by these projects are concentrated.

Summary of findings

- Domestic participation is infrequent in the sample and is predominantly observed when the project is located in a region with higher income levels and development. Fewer than one-third of our sampled projects involve participants solely from the project implementation country, and most of those are in countries with higher development and income levels.
- Most project developers and owners are headquartered in countries with higher levels of development and income. For both types of actors, slightly less than half are headquartered in countries with very high human development and high income.
- The geographical and socio-economic characteristics of central project participants differ markedly across regions. African projects are characterised by a predominance of entities headquartered outside the region. Whereas the sampled European & North American projects, located in countries with the highest levels of Human Development and Income, are exclusively implemented by entities headquartered in the same region (all entities are even based in the same country except for one Dutch project involving two German consultants). The sampled Latin American & Caribbean and Asian projects also exhibit high levels of regional participation.
- The carbon credit standards enforce unclear project role categories, with the 'other participants' category covering a problematically wide range of actors, from implementing partners and project investors to carbon consultants. Across the sampled projects, the reporting of these roles is fragmented and often vague throughout the project documentation.
- Forestry & Land Use projects record the highest number of 'other participant' roles among the sampled projects. Whereas the Household & Community projects are characterised by a relatively small number of developers repeatedly participating across multiple sampled projects.

Recommendations

Carbon crediting standards

Carbon crediting standards, such as Verra, Gold Standard, ART Trees, and many more, define the rules and procedures for project activities. They should:

- Establish standardised reporting requirements for project participants, requiring clear descriptions of each entity's role and consistent documented disclosure of its registered location. In addition, actors currently categorised in the broad 'other participants' category should instead be clustered by mode of participation, for example in the following non-exhaustive manner:
    - Commercial roles
        - Funders and investors
        - Commercial services
    - Project development related roles
        - Project owner and project developer
        - Drafting, designing, and review of project documents
        - Legal advisory
        - Responsible actor for FPIC and social safeguards
    - Project implementation-related roles
        - Technical support (i.e. for monitoring)
        - Security
        - Manufacturing

- Require complete reporting in project documents. This could be supported with the introduction of training programmes and improved model project documentation and associated guidance to help entities draft project documents. In the case of incomplete reporting, specifically the non-disclosure of key roles of project participants – including the exact partners, subsidiaries, departments and individuals involved – standards should require a correction. Failure to do so should result in penalties or other appropriate measures.

- Improve transparency regarding benefit sharing arrangements. Project developers must be required to provide affected communities with upfront financial transparency on project costs and revenue distribution before the project starts and at least annually thereafter. In addition, if beneficiaries consent, the terms of benefit-sharing arrangements (e.g. share of carbon credit revenue disbursed)

should be disclosed. The terms of the arrangement should be closely reviewed by validation and verification bodies. Moreover, project documentation should require the clear disclosure of:

- who holds carbon rights;
- how benefit-sharing is addressed, including whether it occurs via monetary and/or non-monetary means as well as whether communities received unbiased and independent third-party support;
- how revenues are, and are foreseen to be, shared among the diverse range of technical, advisory, commercial, validating, verifying, and administrative actors as well as communities affected by the project (for communities, disclosure of precise details of the benefit sharing arrangement should be subject to their consent).

ICVCM

The Integrity Council for the Voluntary Carbon Market (ICVCM), a body that sets non-binding yet influential principles for the voluntary carbon market, can play an important role in raising the bar of current practice.

The ICVCM should adopt the recommendations proposed by its working group tasked with assessing sustainable development and safeguards.[12] Key recommendations on benefit sharing from this working group include:

- requiring project developers to provide full financial clarity for affected communities on project cost structures and percentage revenues before agreeing to benefit sharing, since full financial transparency enables affected communities to see a project's costs (recommendations 4.2.4 & 4.2.8);
- requiring that communities receive unbiased technical information, expert advice and legal support (recommendation 4.2.6);
- distinguishing between direct and indirect benefits that are shared with project communities (recommendation 4.2.5).

Governments

Government regulators, both those in host countries as well as those with authority over project developers and other actors, hold a strong lever in shaping carbon crediting projects.

[12] The ICVCM is not required to adopt the recommendations of its working groups.

Host countries of carbon credit projects should:

- Mandate transparent benefit-sharing in carbon credit projects. It should include the disclosure of all entities involved in a project and of project cost structures to authorities, as well as requiring minimum revenue-sharing thresholds. This is done in Kenya, where the law requires 15%-25% of aggregate earnings to be set aside for benefit-sharing purposes depending on the project type.

Countries hosting project managers, such as project developers and project owners, should

- Mandate transparent benefit-sharing in carbon credit projects developed or owned by entities headquartered in the country (e.g. a French project developer operating projects in Kenya), including by requiring the disclosure of all entities involved in their project(s) and their project cost structures to national authorities (e.g. France and Kenya). Additionally, they should deliver minimum revenue-sharing thresholds in the projects, which are audited and evidenced through annual reporting.

Annex: Project Sample

Building on the information provided in the methodology section, this annex provides additional details on the project sample, which is accessible here.

Sampling approach

The data for the sample was drawn from the UC Berkeley Voluntary Registry Offsets Database (version v2026-02).

The overall project population consisted of projects that met all of the following criteria:

- they are classified as Forestry & Land Use, Agriculture or Household & Community projects;
- they are listed as registered[13] in the database;
- they have issued credits between January 2020 and February 2026.

Limiting the selection to projects whose credit issuance occurred in 2020–2026 allows the analysis to focus on more recent voluntary carbon market projects. Since the market includes many different types of projects that are unevenly distributed across global regions,[14] this study uses a stratified purposive sampling approach. In this way, regions are represented proportionately according to their share of the filtered project population, while purposefully selecting the highest-issuing projects across the aforementioned project scopes, within each region.

Project sample

Refining the overall project population to the final sample then followed three steps. First, projects were grouped by region to determine the proportional attribution of projects. Second, within each region, they were proportionally allocated according to a 100-project sample. Third, the highest issuance projects per region were selected, which were slightly adjusted in order to cap the representation of the biggest project scope and improve the representation of the smallest project scope.

[13] Or, in the case of the Gold Standard, the projects were listed as "Gold Standard certified".
[14] We used the UN's classification of world regions, with two modifications: we split the Americas into "North America" and "Latin America and the Caribbean"; we then considered "North America and Europe" together as a new group.

Filtering by region

Projects were first grouped into the following regions:

- North America and Europe
- Africa
- Asia
- Latin America and the Caribbean
- Oceania

These groupings served as the primary strata for the sample. We then followed a proportional design that mirrors the global distribution of projects.

In a filtered[15] population of 2,276 registered Forestry & Land Use, Agriculture and Household & Community projects that have issued credits in the period 2020-2026, we have the following distribution:

- Europe and North America: 213 projects, 9.36%
- Africa: 942 projects, 41.39%
- Asia: 716 projects, 31.46%
- Latin America and Caribbean: 400 projects, 17.57%
- Oceania: 5 projects, 0.22%

Adjusting for proportional representation

Next, within each regional grouping, projects were ordered according to the total amount of issued credits recorded in the database. We then limited the final sample size to 100 projects, in order to have a workable sample to analyse each project's documentation, which were allocated proportionally by region as follows:

[15] We filtered for 'Registered' and 'Gold Standard Certified Project' in the 'Voluntary Status' column, then filtered for 'Forestry & Land Use', 'Agriculture' and 'Household & Community' in the 'Scope' column. In the column "P", "Total credits issued", the option "0" was unchecked, to exclude projects that have not issued any credits. In the column "DU", "ARB/WA Status", the option "Active ARB Project" was unchecked.

Region	Total projects (share by region)	Proportional conversion to 100-project sample	Final number of projects in sample
Europe and North America	213 (9.36%)	100 x 0.0936	9.36 -> 9
Africa	942 (41.39%)	100 x 0.4139	41.39 -> 41
Asia	716 (31.46%)	100 x 0.3146	31.46 -> 31
Latin America and Caribbean	400 (17.57%)	100 x 0.1757	17.57 -> 18
Oceania	5 (0.22%)	100 x 0.0022	0.22 -> 0 -> 1[16]

Scope representation adjustments

Initially, the highest-crediting projects within each region were selected, without taking into account the relative shares of the different project scopes, resulting in 52 Household & Community projects, 39 Forestry & Land Use projects and 9 Agriculture projects. Then, to limit Household & Community projects from accounting for more than half of the sample, we deducted two projects from this scope and added two Agriculture projects, one in Asia and one in Europe and North America, as these regions were found to record the highest numbers of Agriculture projects.

Specifically, the adjustments were carried out as follows: In the region of Asia, the two lowest-issuing Household & Community projects were replaced by one Forestry & Land Use project and one Agriculture project, which were also both from the region. Another adjustment was made in Europe and North America, where the lowest-issuing forestry project was replaced by the next highest-issuing Agriculture project. The final sample comprised of 50 Household & Community projects, 39 Forestry & Land Use projects, and 11 Agriculture projects, as shown in the table below.

[16] We rounded up to 1 in order to have 1 project from Oceania in our 100-project sample.

Region	Forestry & Land Use projects	Agriculture projects	Household & Community projects
Europe and North America	7 (-1) -> **6**	2 (+1) -> **3**	**0**
Africa	**9**	**0**	**32**
Asia	4 (+1) -> **5**	7 (+1) -> **8**	20 (-2) -> **18**
Latin America and Caribbean	**18**	**0**	**0**
Oceania	**1**	**0**	**0**
Total	***39***	*9 (+2) -> **11***	*52 (-2) -> **50***

Overall, from a filtered population of 2,276 registered Forestry & Land Use, Agriculture, and Household & Community projects that issued credits in the period 2020-2026, our final sample of 100 projects is proportionally distributed across regions and focuses on the most significant projects by issuance. By selecting projects with the highest issuance volumes, the study focused on those likely to be most influential in the market and most relevant for analysing the geographical distribution of actors.

We acknowledge that a sample of 100 projects from three scope categories cannot be fully representative of the entire voluntary carbon market. We also recognise that focusing on projects with high credit issuance may not necessarily reflect the broader market. Nevertheless, our findings from this sample have given us important insights into the patterns of actor distribution across world regions of some of the biggest projects across key project scopes.

CARBON MARKET WATCH

Author

Christoforos Zisis
Policy assistant, Global Carbon Markets

Benja Faecks
Policy expert, Global Carbon Markets

Editors

Greta Hirschberg
Communications specialist

Jonathan Crook
Policy lead, Global Carbon Markets

Design

Greta Hirschberg
Communications specialist

Meili Vanegas Hernandez
Researcher and data analyst

Image source

Canva images

CONTACT

Jonathan Crook
jonathan.crook@carbonmarketwatch.org