

## **RESILIENT TARANGIRE ECOSYSTEM PROJECT - PROPOSED SOIL CARBON PROJECT**

### **SUMMARY OF CRITICISM IN DRAFT MISA REPORT FEB 2025 - SUMMARY OF TNC CORRECTIONS + PROOF**

The science is clear that climate action is disparately needed to avoid disastrous impacts of rural communities in Northern Tanzania, further there is an opportunity to mitigate climate change, increase climate resilience and generate revenues for communities for land management and livelihood improvements in this landscape through empowering community to improve rangeland management. The project recognises that while not our view and not borne of by scientific literate, some groups are not supportive of carbon markets ideologically. The issue of carbon markets ideology is distinct from concerns of human rights which this report confuses; yet there is agreement between the project and the authors that respecting human rights and social safeguard are paramount in any project.

Over the last 18months the project has directly engaged over 3,300 individuals in consultations, in addition to further consultations at village general assembly, ward and district level with individuals, subgroups of the community and office bearers. Of the 11 villages the report authors visited, only one is being engaged by the “TNC-led” carbon project. Therefore many of the report’s findings are not representative or relevant to the “TNC-led” project. Indeed, critical examples of the project are all in relation to the “Soil For The Future” project, or inaccurate understandings of the “TNC-led” project. The report contains a number of inaccuracies that we want to offer support and evidence to amend. The project is happy to share experiences and examples of project documentation including letters of interest and draft contracts to ensure there report accurately captures the facts and the situation. We’d also be interested to receiving constructive feedback and input into the project designs that strengthens the positive community impact all project stakeholders are hoping to generate. A summary of the reports claims and the projects responses to these claims is presented below.

Topic	Report Claims	TNC's Rebuttal	Rebuttal Proof Points
<b>Free, Prior, and Informed Consent (FPIC)</b>	<p>The FPIC process is flawed, with limited community participation, exclusion of women and youth, and non-transparent agreements.</p> <p>Carbon projects displace traditional land use practices and take land out of local control to place it in the hands of an outsider using Western science, dismissing Indigenous knowledge.</p>	<ul style="list-style-type: none"> <li>- Extensive community engagement and training sessions conducted, including a codesign phase where specific subsets of the community were specially targeted for consultation with women, youth, and marginalised groups, ensuring FPIC met.</li> <li>- Community consent documented and village councils approved participation</li> <li>- UCRT co-facilitated FPIC, following best practices in obtaining informed consent</li> <li>- No contracts have been signed - Letters of Intent signed with 36 villages</li> <li>- Contracts will be based on codesigned project features the community has provided feedback and input on. Further consultation planned prior to signing. Signing requires Village General Assembly vote to direct Village Council to sign the contract.</li> </ul>	<ul style="list-style-type: none"> <li>- Tanzania's Environmental Management (Control and Management of Carbon Trading) Regulations, 2022 (GN No. 636), mandate that FPIC must be obtained before carbon projects proceed.</li> <li>- Project partnership with UCRT as evidence of adherence to FPIC best practice standards</li> <li>- Community Consultation and Outreach Plan formed and followed: each village has been consulted at least twice over the last 18 months, with additional meetings held at district and ward level. In total project has engaged over 3,300 individuals, not including VGA where the project has been presented.</li> <li>- Village Councils are the legal rights holders in Tanzania.</li> <li>- Letters of Intent are non-binding agreements that set out that the village has discussed the carbon project opportunities and wishes to continue to explore project development. Over 45 villages were consulted and 35 expressed interest to continue project development at this time. Template LOI can be shared with the authors.</li> <li>- Draft community contracts shared for the authors, but these had not been signed with communities yet.</li> </ul>
<b>Impact on Traditional Pastoralist Practices and Mobility</b>	<p>Carbon projects will introduce rotational grazing systems that disrupt traditional Maasai grazing practices, leading to land-use restrictions and loss of control.</p>	<ul style="list-style-type: none"> <li>- Current rangeland health assessments show evidence of rangeland degradation</li> <li>- Project design supports improved rangeland management through community empowerment, which includes sustainable grazing practices rather than restricts pastoralists.</li> <li>- Rotational grazing is scientifically supported for improving pasture productivity and resilience with evidence from rangelands improvement in parts of the landscape</li> </ul>	<ul style="list-style-type: none"> <li>- International scientific expert studies (by the project and external groups) confirm perspectives from the community that rangeland health is degraded in the landscape.</li> <li>- UCRT/TNC's Holistic Planned Grazing (HPG) system does not restrict traditional Maasai grazing patterns and allows for joint grazing systems in villages that are adjacent to each other across several wards</li> <li>- Traditional grazing components e.g. dry, wet, and olokeri areas, sharing grazing with outsiders - are</li> </ul>

		<ul style="list-style-type: none"> <li>- Program developed with input from local pastoralists and specifically design to empower communities.</li> <li>- Strengthens community governance and resource management, avoiding conflicts by strengthening transparency and ownership by communities.</li> </ul>	<p>included in the Improved Rangeland Management practices.</p> <ul style="list-style-type: none"> <li>- Improved rangeland practices based on traditional practice build soil carbon and rangeland health leading to more productive and resilient grass availability for livestock.</li> <li>- Examples globally and regionally from other improved rangeland management projects have reportedly improved pasture conditions.</li> </ul>
<p><b>Regulatory and Legal Framework Concerns</b></p>	<p>The voluntary carbon market is poorly regulated, and Tanzanian laws do not adequately protect Indigenous land rights. Additionally, contracts are structured to favor carbon proponents, making it difficult for villages to withdraw.</p>	<ul style="list-style-type: none"> <li>- Only LOI signed with communities which is a nonbinding consent to proceed with project developing. Communities can withdraw at any point, but the LOI sets of the roles and expectations on all parties as part of project development.</li> <li>- Contracts have not been signed, but draft contracts comply with Tanzanian carbon trading regulations and is pending communities review, inputs before finalization. In Meeting with TNC and MISA delegation, TNC offered to MISA delegates that we share contracts for inputs as an approach to widen stakeholder engagement and participation</li> <li>- Benefit-sharing arrangements transparently negotiated and exceed regulatory requirements.</li> <li>- Villages have legal recourse if they wish to exit agreements</li> <li>- Agreements include grievance and dispute resolution mechanisms</li> <li>-An Special Purpose Vehicle (SPV) will be formed to implement the carbon project will be initially part owned by the community transition to full community ownership at specific milestones. Key</li> </ul>	<ul style="list-style-type: none"> <li>- Tanzania's National Carbon Monitoring Centre (NCCMC) coordinates all carbon projects</li> <li>- Amendments to Tanzania’s Carbon Trading Regulations (GN No. 721 of 2023) require clear benefit-sharing agreements between carbon proponents and managing authorities - The regulations include sections emphasizing community engagement to ensure human rights protection e.g. 17 (c), 21, 24 (f) (g), 34, and 36 (d).</li> <li>- Dispute resolution mechanisms included in draft contract, allowing for fair negotiations.</li> <li>- Draft contracts available for review.</li> </ul>

		revenue sharing decision are made by community in the project.	
<b>Legitimacy and Effectiveness of Carbon Credits</b>	Soil carbon credits do not effectively mitigate climate change but instead provide corporations with a justification to continue emitting CO <sub>2</sub> . There is no scientific evidence that these projects will lead to meaningful carbon sequestration.	<ul style="list-style-type: none"> <li>- Methodologies approved by Verra and other international certification bodies endorse soil carbon sequestration, and same standards applied to forest carbon projects.</li> <li>- Strengthens community capacity to mitigate climate change on their land and sustain livelihoods.</li> <li>- Climate change impacts most likely to fall on rural communities' in Africa who are particularly dependent upon nature and natural resources. Healthy and resilient rangelands are the best adaptation measure to climate change. Improve rangeland management requires long term financing support; carbon markets are only one tool but the most viable our disposal today to generate resources to support improve rangeland management.</li> <li>- Project contributes to global carbon reduction efforts and aligns with conservation goals.</li> <li>- No truth to claims the project amounts to land grabbing or a false climate solution.</li> </ul>	<ul style="list-style-type: none"> <li>-UNFCCC and other global climate experts show land degradation contributes ~10% to global carbon emissions; and the nature removes around ~30% of anthropogenic global carbon emissions. Nature based projects are an effective and efficient solution for climate action, and produce significant co benefits to people and nature.</li> <li>- Article 6 of the Paris Agreement established clear framework for carbon market to drive global climate action.</li> <li>- Verra's certification standards and Tanzania's National Carbon Trading Guidelines (2022) outline approved methodologies for verifying carbon sequestration.</li> <li>- Verra's VM0042 methodology supports improved rangeland management practice as a means to increase soil carbon soils. TNC assessments show the accounting methodology is one of the most robust and rigorous approaches for measuring climate impact.</li> <li>- Similar soil carbon sequestration projects have been validated under international frameworks</li> </ul>