Carbon done wrong

Controversial carbon credit project in Sierra Leone threatens people’s land rights

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A carbon credit project in the heart of Sierra Leone’s Port Loko district is raising significant concerns over land rights, lack of community consent, and potential social repercussions. The project, aiming for carbon offsetting through tree planting, risks threatening the livelihoods of communities in Port Loko while raising questions about transparency, accountability, and equitable distribution of benefits. This brief seeks to voice the concerns of people in the Port Loko District of Sierra Leone, namely in the Chiefdoms of Burreh, Kasheh and Maconeth, as they face the threat of land loss and livelihood disruption under the guise of carbon offsetting.

1. Summarizing the facts

In 2021, a Sierra Leonean company called Rewilding Maforki, initiated a carbon credit project in the district of Port Loko, in the northwest of Sierra Leone. The company is planning a tree plantation on at least 25,000 ha\(^1\), an area comparable in size to Manhattan, to store 12 million tonnes of carbon dioxide over 50 years and generate extensive profits through the sale of carbon credits\(^2\).

According to Rewilding Maforki, 60 villages will be targeted with this project\(^3\). A village in this area typically has 50-300 inhabitants, who depend greatly on subsistence agriculture. The project is still in its infancy, with only 1,400 ha planted by the end of 2023\(^4\). The trees planted are a selection of local tree species\(^5\).

People in affected communities in Port Loko allege that they did not consent in the required form to the planting of trees. Many of them neither know what carbon credits are, nor that their land will be forest-locked\(^6\) for decades. Moreover, little do they know how much money the companies will be making with their land. Additionally, concerns pertain about the effectiveness of the project in terms of greenhouse gas emission reductions. Given the information provided by the affected communities in Port Loko and key interviewed informants, the five NGOs behind this research\(^7\) are highly concerned that Rewilding Maforki has violated the people’s land rights as stipulated in the Customary Land Rights Act of Sierra Leone, as well as the principle of free, prior, and informed consent (FPIC)\(^8\).

Principally responsible for this project are three businesses. ‘Rewilding Maforki’ is the executive company that is on the ground planning the tree plantations and communicating with local people and authorities in Sierra Leone. Then there is the Canadian carbon trader ‘Carbon Done Right’, formerly known as Klimat X (here-
after referred to as Carbon Done Right), which is the “implementing partner” of the project, essentially finding and securing investments for the project as well as governing the future trade of the credits. The third actively involved business is the Swiss consulting company ‘Ecosecurities’, which plays an advisory role in the project. The Geneva-based consulting company is supporting Rewilding Maforki in the registration and certification process under the Verra Verified Carbon Standard (VCS). Additionally, a legal NGO called Namati is accompanying Rewilding Maforki during the project implementation process. Meanwhile, Carbon Done Right has already signed a 2.5 million USD funding agreement with BP Carbon Trading limited, a subsidiary of the British oil corporation BP. This deal grants BP Carbon Trading exclusivity over the project's first credits from 5,000 hectares of planted land.

The team of NGOs behind this research, based on the evidence in this report, has doubts as to whether the carbon credit project in the district of Port Loko meets the standards necessary to receive certification under the Verra VCS. Furthermore, they question the legality and integrity of the project. Above all, the team of NGOs is highly concerned about the land rights and livelihoods of the communities living in the affected areas in the Port Loko district. The team of NGOs has information that the company is engaging with communities at the time of writing, apparently to sign a land lease agreement (see 2b). This makes it even more crucial to lay out the current situation on the ground and ensure people’s rights are protected.

The team behind this research and methodology

For this research, a collective of five organizations conducted three main field visits in the Chiefdoms Burreh, Kasseh and Maconteh from March 2023 to March 2024: Sierra Leone Network on the Right to Food, United for the Protection of Human Rights, Women’s Network against Rural Plantation Injustice, Green Earth Sierra Leone (all Sierra Leone) and HEKS/EPER (Switzerland) (hereafter referred to as the team of NGOs).

The team of NGOs visited a total of 25 of the villages in which Rewilding Maforki claims to be operating. They held community meetings with men and women and interviewed key informants separately. In addition, the team talked to local government officials, Paramount Chiefs as customary authorities, company representatives from Rewilding, and representatives of the NGO Namati. The information in this report, unless otherwise indicated, derives from this fieldwork.

Except where individual quotes are cited, the information relies on interviews with at least two independent informants. While it does not bring forward particular cases, it is descriptive of the situation on the ground. The affected companies were given multiple opportunities to comment, and their statements were considered in the drafting of this report. Due to security concerns the interviewed people as well as the respective village names are fully anonymized.

The Sierra Leonean company called Rewilding Maforki is planning a tree plantation on at least 25,000 ha, an area comparable in size to Manhattan, to store 12 million tonnes of carbon dioxide over 50 years.
What are carbon credits?

Carbon credits are a form of tradable permit. One carbon credit is assumed to represent one tonne of carbon dioxide (CO₂) or an equivalent amount of other greenhouse gases. They are generated by projects that claim to reduce or remove emissions, such as reforestation or renewable energy projects. These credits can be bought and sold in carbon markets and used by the buyer to claim that their products are “carbon neutral”, and seemingly do not damage the climate even if fossil fuels were burned in the production process. Through the purchase of carbon credits, businesses may also claim that they are a “net zero emissions” company, because the credits offset their own greenhouse gas emissions. Carbon credits are therefore often used as a loophole for businesses to continue polluting while making only limited efforts to reduce their own emissions. Moreover, the effectiveness of carbon credits in achieving real emissions reductions is questionable, as the methodologies for calculating and verifying emissions reductions are complex and prone to manipulation and inaccuracies.

2. Land rights concerns

The starting points of this research were Carbon Done Right’s announcement that they would become active in the region16, as well as concerns by activists from Port Loko who indicated that business activities in the region were started without consent from the local communities and were threatening the community’s land rights. Rewilding Maforki states that it respects Sierra Leonean laws15 and Ecossecurities confirms in the project documentation prepared for Verra that “project activities are based on a robust FPIC strategy, employing a participatory, inclusive, and collaborative approach”19. The statements from the interviewees as well as the information gathered during the field visits, however, point to the contrary. This is why the team of NGOs is highly concerned that Sierra Leonean land laws as well as the principle of FPIC are not being respected in the carbon credit project in Port Loko. This concern is shared by two external Sierra Leonean lawyers17.

a. No family consent for the project

The Customary Land Rights Act (CLRA) states that at least 60% of the adult members of the land-owning families – both men and women, young and old – must give their consent before their land can be given away. The consent must be informed, given in written form, witnessed by the Paramount Chiefs and registered with authorities18. Importantly, the responsibility to ensure that these steps are followed also rests on the invest-
Rewilding Maforki states that “the project team encouraged every community member, including women, ... to be involved in every part of the decision-making process.” However, interviewed people from the communities reported that, with a few exceptions, most women were either not involved at all or participated in meetings as mere listeners and were never asked for their consent. While women generally often have been excluded from decisions on land, they now enjoy the same rights to land according to the Customary Land Rights Act. This is confirmed by interviewed landowners present, many of which said that the procedures during these events were held in a hurry. This setting may suggest that the consent was not entirely free. Most interviewed landowners reported that they did not know or understand what they were signing. They neither received an explanation, nor were given a copy of the document. Many of the landowners cannot read English documents (as English is not the local language), which significantly raises the importance of a proper explanation. Some landowners understood that what they signed was a land lease agreement but had little knowledge of what exactly the terms were. Others insisted to have understood that they were signing receipts for the money received. “For the payment, they asked us to sign a document without clearly explaining it. We assumed it was for the money, not realizing it was an agreement,” a landowner says.

b. Lack of information and legal ambiguities

Rewilding Maforki seems to have started its activities in Port Loko, including the use of land, without sufficient legal basis, since it initiated surveying the land and clearing the first areas before any document was signed by community members. The Customary Land Rights Act states that the investor shall sign a lease agreement before the start of the investment. According to the information gathered during the field visits, the first agreements were signed in September and October 2023. At the same time, in October 2023, Carbon Done Right announced the completion of the second year of planting.

Eventually, some community members asked for surface rent for their land, which Rewilding Maforki then paid to a few individuals from landowning families. After negotiations, the surface rent was fixed at 14 USD per ha per year. Most payments were based on land mapping processes that Rewilding Maforki conducted in the villages. Rewilding Maforki claims to have done these mappings in a participatory way, guaranteeing FPIC, but has not provided evidence of this to the team of NGOs at the time of writing.
Indeed, there seems to be a lot of confusion around the nature and legality of this document, and not only among community members. The team of NGOs received conflicting information about the document titled "Individual Landowner Lease Agreement". Ecosecurities writes in the project documentation submitted to Verra: "Binding lease agreements were signed with landowners and with the consent of Paramount and section Chiefs". Rewilding Maforki confirms that these signed documents are the legally binding land lease agreements, but that soon an "overarching" land lease on the Chiefdom level will be signed. Namati, on the other hand, stated that this "Individual Landowner Lease Agreement" was a pre-agreement done by Rewilding Maforki. It would "promote FFIC" but will be "surpassed" by the lease arrangement on Chiefdom level.

According to both Rewilding Maforki and Namati, this overarching lease agreement was apparently being finalized at the time of writing and the communities were being consulted. The consultations are concerning due to the unclear nature of the 'Individual Landowner Lease Agreement' at all levels. Realizing an agreement with necessary consent will require significant time and effort, as indicated by the research findings.

Furthermore, Carbon Done Right provides inconsistent information about the project area. There are "individual landowner agreements" as well as so-called "multi-stakeholder agreements", which should cover a total area of 25,000 ha. In a press release of Carbon Done Right, 57,000 ha were "secured" for the Rewilding project (at least mainly in Port Loko). Rewilding Maforki stated that currently the project plan is for 25,000 ha, while 5,000 ha have already been surveyed and covered by the "Individual Landowners Lease Agreement".

c. Substantial concerns

To shed light on the legality and nature of the "Individual Landowner Agreement" as well as the legality of the processes leading up to the document, the team of NGOs consulted two external Sierra Leonean lawyers. While they had slightly different understandings of the document, they were both very concerned that the Customary Land Rights Act was not respected. They highlighted that there is no evidence or documentation showing that the necessary informed and written consent of at least 60% of the landowning family members had been obtained or the stipulated procedures had been followed. This consent is precedent to any binding agreement. The lawyers suggested that, if the Customary Land Rights Act was found to be violated, any documents signed by community members would be invalid. The lawyers of the company rendered a different legal opinion.

On top of that, according to the Customary Land Rights Act, any lease agreement for a land project must include a "detailed, specific description of the investment", including risks. Rewilding Maforki did commission an Environmental and Social Impact Assessment and shared a copy. However, the team of NGOs could find no evidence that the people were aware of the possible impact, nor are they stipulated in the "Individual Landowners Lease Agreement". Beyond impacts, many community members report that the operations of the company were never explained to them, they were only told that Rewilding Maforki wants to plant trees for the environment and the climate. Among the interviewees, none knew what carbon credits are and how the mechanisms of the voluntary carbon market function.

With this evidence presented above, it seems very likely at the time of writing that most community members, including landowning families, did not give their free, prior, and informed consent, and neither was the 60% consent margin required under the Customary Land Rights Act respected. It appears very likely that Rewilding Maforki started its business activities without respecting Sierra Leonean land laws, including FFIC. Therefore, the team of NGOs is concerned that the carbon credit project in Port Loko is not meeting the Verra Standards required for receiving certification. More importantly, the team of NGOs is highly concerned about the situation regarding respect for the land rights of the people in the Port Loko district.

3. A history of land rights struggles and community resilience

It is not the first time that Port Loko’s land is being in demand. Ecosecurities and Carbon Done Right write that the land today within the project area is "degraded" because, apart from other human activities, it has formerly been used as a palm oil plantation that was later abandoned. Indeed, in 2009 the palm oil company Sierra Leone Agriculture Ltd (SLA) – directed by the current president of Carbon Done Right – had already taken those lands to establish a palm oil plantation. Recently, this also occurred under circumstances that put into question the free, prior, and informed consent of community members. Within a few years the company – by then under a new owner and management – ceased operations and several community members went to court to ask for the return of their lands. In 2018, the High Court of Sierra Leone ruled in favour of the plaintiffs, giving them back their land titles, and ordered that the company owed villagers about 250,000 USD in surface rent. This sum is still outstanding today.

Where the palm oil plantations perished, the communities eventually started to use parts of the land again for their own purposes. Recently, however, they found that their land was in demand again, by Rewilding Maforki, whose co-founder and majority shareholder is again the current president of Carbon Done Right, who was involved in the initial palm oil land deals for SLA.
Carbon Done Right currently owns 100% of the rights to the planned carbon credits and is in charge of securing funding to the project as well as finding buyers for the credits, once they are certified.

Other parts of the oil palm plantations were still in good condition after SLA left. For these parts, another company named ‘Sierra Organic Palm’ signed contracts with the Chiefdom Councils and landowners as early as in 2021 to use these oil palm plantations again. ‘Sierra Organic Palm’ is also linked to the president of Carbon Done Right, but these connections are complex due to the convoluted organizational structure of the company. After operating for merely two years, ‘Sierra Organic Palm’ informed landowners that they were going to surrender the land, purportedly due to high deficits.

As an important figure when SLA acquired land for oil palm plantations in 2009 and 2010, Carbon Done Right’s president remains known among individuals in the community involved in land-related decision-making in the area. Several of the interviewed landowners state that the companies were introduced to them through the same contact persons in the communities, who were and remain influential. “These companies are children from the same mother,” one elder summarized.

While Port Loko has a history of land right struggles, Rewilding Maforki is today operating under very different legal circumstances than SLA 15 years ago, as, since 2022, Sierra Leone has land legislation that entitles local communities to rights over their lands.

4. Unproductive lands?

The project documents describe the area in which the tree plantations are foreseen as “low-intensity and unproductive”, as well as “degraded” lands. The people from the communities however allege that part of their livelihood depends on these lands. Interviewed people from the villages reported to have used the land that Rewilding Maforki is now claiming for annual crops, including cassava, groundnut, pepper and cucumbers. *We used to grow groundnut, cassava, and millet. Currently, we are not farming there because Rewilding has taken over the land and doesn't allow us*, an elder woman reported.

The people in the communities clearly stated that there are no unproductive lands. They previously used parts of the productive savannah land – that Rewilding Maforki has now taken – for their farming activities. In contrast, Rewilding Maforki claims to ensure the land they are mapping is not being used by the community. They further state that if it is there would be many ways for the landowner *to object, raise a grievance or similar*.

An agronomist from the Ministry of Agriculture in Port Loko confirmed that the so-called ‘savannah land’ is fertile, and is used for agriculture, including growing cassava and vegetables. In one community, the land is also used by herders who bring their animals for grazing, particularly during the dry seasons. This is common for savannah land, as the agronomist confirms. Rewilding Maforki’s project could jeopardize access to this grazing ground.

A farmer showing her crops growing on savannah land. An agronomist from the Ministry of Agriculture in Port Loko confirmed that the so-called ‘savannah land’ is fertile, and is used for agriculture, including growing cassava and vegetables.
5. Duration of the project

A further major concern for the people in Port Loko is the project duration. The team of NGOs found yet again conflicting information about the length of the project. Most concerning is that people from the communities reported not to be informed about the fact that their land might be forest-locked for up to five decades.

Carbon credit afforestation projects only effectively absorb carbon dioxide from the atmosphere when they last several decades, since only big, mature trees absorb significant amounts of carbon dioxide from the atmosphere and store it in their trunk and the soil. If a tree is cut down or burned it releases most of the stored CO₂ back into the air. While there are no strict ‘permanence’ criteria for carbon credits, an international practical consensus indicates that carbon must be stored for at least 100 years. This benchmark reflects practical and operational project constraints rather than scientific ones, as every tonne of emitted CO₂ remains in the atmosphere for 300-1000 years. Most carbon credit afforestation projects, including those certified under Verra, must guarantee that the forest remains for several decades, ideally over 50 and up to 100 years. In this context, Ecosecurities writes in the project documentation that the “project crediting period is 50 years”.

Though the project period appears to be 50 years, some of the landowners in Port Loko as well as the Rewilding Maforki representative stated that the ‘Individual Landowner Lease Agreement’ would last for 20-30 years, depending on the family. The interviewees consistently and strongly rejected the idea that the period of use could be 50 years. This proved to be an emotional question, as they expressed surprise and anger. Only a few reported conversations where the company had mentioned a period of 50 years, and they added that this was rejected by landowners who were only ready to talk about 20-30 years. Many stated that 50 years would put future generations at risk: “Generations yet unborn, and our ancestors too, they will blame us if we fail to protect this land”, a landowner said.

Additionally, the trees which have already been planted do not seem to be in a very good condition. The team of NGOs noted during their visit to the Rewilding Maforki project site that although some of the knee-high trees appeared healthy, others already appear dead. When questioned about the reasons, people from the communities consistently stated that the timing of planting was poorly chosen, occurring towards the end of the rainy season. One landowner found it very problematic to witness how the company has taken all their lands, only to neglect the proper planting of trees. Rewilding Maforki named several possible reasons such as rodent and termite activity and claimed that these were only trials with local trees.

Another continuous threat to the survival of the trees and the project duration stems from wildfires, which often occur in dry savannah lands mainly due to farming practices or other human activities, but also due to climatic causes. To prevent such fires, the company has established fire crews. These are teams of local employees that monitor and fight fires, raise awareness on fire prevention, and create fire belts around the plantations. Some local people alleged that these fire crews have already prohibited them from farming and accessing their own lands near the tree plantations due to concerns about fire spreading from neighbouring fields. Ironically, and while the project documentation prepared by Ecosecurities highlights fires as a key risk for the forest, it also states that in order to prepare the land for the tree plantation, “grasses will then, in some cases, be burned”. This implies that, initially, fires are employed to clear the land for Rewilding Maforki’s tree plantation, only for them to subsequently advise local people against using fires.

In summary, information about the duration of the project is inconsistent and the community appears not to be well informed about Rewilding Maforki’s long-term plans in the region. Some of the plantations already seem to be set up for failure.

6. Benefits for whom?

Apart from surface rent, Rewilding Maforki promised the communities ‘development’. The company has reportedly pledged to construct schools, hospitals, and boreholes for water. However, according to the documents the team of NGOs has received, none of these commitments are formalized in written agreements. The company did establish a Community Development Plan and some activities have started. These include some boreholes, which have already been constructed, and scholarships, which some selected children received. However, according to the Customary Land Rights Act in Sierra Leone, such infrastructural project benefits for communities always need to be stipulated in a written agreement with the community.

Rewilding Maforki employs local people, mostly for fire service, brushing and planting. Rewilding Maforki states to have employed 50 permanent staff members and to have “a payroll of over 200 staff” monthly. In the project documentation Ecosecurities wrote that the project hired “hired 300 people from the community as permanent employees”. Interviewees alleged that the employment is not permanent, and, with few exceptions, on a casual basis only. However, the Customary Land Rights Act has a clear provision regarding employment: “If jobs are to be provided, details concerning the percentage of the overall workforce” must be included in a lease agreement. Yet, the ‘individual landowners lease agreement’ that the team of NGOs saw, only states “employ-
ment opportunities will be granted (…) as and when they arise”.

A further promised benefit for the communities is a “10% share of the profit” for landowning families from the sale of the carbon credits, as stated in the ‘Individual landowners lease agreement’. However, no information is provided as to how this distribution of profit will be put into practice. As mentioned earlier, nearly no community member has ever heard of carbon credits. A member of the Port Loko District Council speculated that the company does not want the people to know that a lot of money will be made with this business model.

It is highly unclear how exactly the people from the communities will benefit from the sale of the carbon credits generated on their lands. The expectations range from fresh air to shade or better water availability, from jobs on the plantations to being entitled to harvest fruits to eat. In contrast, in their official reports, Carbon Done Right states that it has rights over 51% of the “biological asset rights and revenues” coming from these plantations, including timber. This could imply that the people would have no rights to the products of these trees. Once more the fact that these promised benefits were communicated orally and not stipulated into an agreement, is not in line with what the Customary Land Rights Act requires for a lease agreement.

7. Profits for whom?

Although the landowning families in Port Loko apparently remain misinformed about the activities on their own land and did not consent to most of them, millions of dollars in cash and shares have already been exchanged between the companies involved in the corresponding carbon deals for this project. Among other transactions, Carbon Done Right has already received 1.5 million USD out of a 2.5 million USD funding agreement with BP Carbon Trading limited, a subsidiary of the British oil corporation BP. This deal grants BP Carbon Trading exclusivity over the project’s first credits from 5,000 hectares of planted land.

Whereas many investments were made to start the project, Carbon Done Right expects to make 300-450 million USD from carbon credit sales of the Rewilding Maforki project over the lifespan of the project. While Carbon Done Right foresees revenues of up to 360 USD/ha per year, they negotiated a yearly surface rent of 14 USD per ha with the landowners.

For now, Carbon Done Right reports not to have made any profit yet and has reported no income from operations. Until the end of Sept 2023, the company had accumulated a deficit of over nine million USD since its foundation. Despite these deficits, they are paying hundreds of thousands of dollars in salaries and payments to directors and companies controlled by them. These initial deficits are typical for venture capital, as investments
are made in projects without the immediate option to sell the carbon credits, due to the lack of certification and the time required to generate revenue.

For the future, Carbon Done Right announced plans to “expand operations in Sierra Leone (...) and will transfer the same model to other countries across Africa, starting in Ghana and Liberia. Approximately half of all land suitable for restoration in Africa is held by smallholders.”

8. Conclusion: A risky bet on shaky grounds?

The companies Carbon Done Right, Rewilding Maforki, and the advisory Ecosecurities all seem to be making a risky bet that these carbon credits can be sold. However, the carbon credit project initiated in Sierra Leone’s Port Loko district is embroiled in controversy over alleged land rights violations and lack of community consent. The project aims to offset carbon emissions through extensive tree planting, potentially disrupting local livelihoods and raising concerns about transparency and equitable benefit distribution. Affected communities allege infringement of their land rights, emphasizing inadequate consultation and understanding of carbon credits, jeopardizing their rights and interests.

There are doubts over the project’s adherence to Sierra Leonean laws, including the principle of free, prior, and informed consent (FPIC). Conflicting information about lease agreements and project duration further complicate matters, fuelling scepticism about the project’s legality and long-term impacts.

Despite millions of dollars invested, doubts persist regarding the project’s legitimacy and its actual benefits for local communities. Carbon Done Right anticipates substantial profits from carbon credit sales, yet community members remain marginalized and misinformed about the project’s implications, casting doubt on the project’s ethical and legal foundations. This is why the team of NGOs is highly concerned about the legality and integrity of the carbon credit project conducted by Rewilding Maforki and Carbon Done Right in the Port Loko district of Sierra Leone. Based on the evidence of this report, the team of NGOs has doubts as to whether the project meets the criteria for obtaining certification under the Verra Verified Carbon Standard. Yet above all, the team of NGOs is highly concerned about the land rights and livelihoods of the communities living in the affected areas in the Port Loko district.

Annex: Methods

Staff involved in this research have been engaging with the affected communities for many years, prior to the start of the project of Rewilding Maforki. They already worked with the communities when Sierra Leone Agriculture (SLA) was operating. When these organizations learned – both from affected communities and from investor information – that carbon companies are interested in these lands, they conducted two exploratory field visits (three days in total) to the area in March and April 2023. The team of NGOs, together with lawyers, then conducted a ten-day field visit in the communities, including nineteen community meetings. This field visit was explorative and aimed at finding out which carbon company operates where and under what conditions. During the entire time of the research, the staff visited the communities on a regular basis.

These research visits laid the ground for the main field visit in January 2024. A team of fourteen people carried out a ten-day field research, targeting twenty-three communities affected by Rewilding Maforki. Over the course of all field visits, a total of 25 villages was visited, some of them more than once. In the communities, the team held extensive meetings, with men and women separately. Such community meetings had approximately fifteen to forty people present. In addition, the team carried out interviews with key informants relevant to land acquisition processes, of whom some were from the communities, and others were local government officials, Paramount Chiefs as customary authorities, company representatives from Rewilding Maforki, and representatives of the NGO Namati. These findings were again corroborated in a nine-day field visit in February/March 2024 in six communities, complemented by 13 key informant interviews. In addition, the team of NGOs took short videos of selected persons from the communities during the February/March 2024 visit. The team also took pictures to document the situation on the ground.

In addition, the team sought to triangulate information by accessing relevant documents, e.g. in corporate registries as well as from people in the communities and the companies involved. The team also conducted desktop research, including company databases. The team took notes during all interviews and community meetings in 2024. All affected companies were involved through questionnaires and given an opportunity to comment on the main conclusions presented in this report. All relevant notes and further data are stored at HEKS/EPER.

Our report is based on the information and the sources available at the time of research. Recent or future developments cannot be covered in this report.
Endnotes

1 Project documentation prepared by Ecosecurities for Verra Carbon Standard, issued on 16th Dec 2022, (accessed 17th March 2024); Information confirmed in interview by representative of Rewilding Maforki, 28th Feb 2024.

2 Project documentation prepared by Rewilding Maforki ‘INTRODUCTION TO THE REWILDING MAFORKI PROJECT’, received upon request from Rewilding Maforki on 16th March 2024. Clarification on calculation of carbon credits in response to questions received by HEKS/EPER from Rewilding Maforki on 17th April 2024.

3 List of villages part of the Rewilding Maforki project, received upon request from Rewilding Maforki on 20th Dec 2023.

4 Email from Rewilding Maforki, received by HEKS/EPER on 13th March 2024.


6 Forest-locked means that the land will be used for tree plantations or forests for carbon credits and will no longer be usable for the local communities.

7 See explanatory box below: “The team behind this research and methodology”.

8 On the principle of FPIC see explanatory box below: “The Customary Land Rights Act and FPIC”.

9 Verra is a certification and standard-setting organization for carbon credit projects which reviews and certifies projects according to its standards. Usually, carbon credits are traded once certification is complete (accessed 14th March 2024).

10 Namati’s role in the project is supposed to be “the legal representative of chiefdom communities” [Source: Project documentation prepared by Ecosecurities for Verra Carbon Standard, issued on 16th Dec 2022, p.10; further: Klimat X, press release of 16th Oc. 2023].

11 Under the pre-purchase financing structure, the investment is repaid in tonnes of carbon credits issued by the project at a pre-agreed price. Klimat X press release on 15th June 2023 and press release of 18th Dec 2023, (accessed 18th March 2024); Klimat X Condensed Interim Consolidated Financial Statements for the three and six months ended June 30, 2023 and 2022, p. 13-14 (accessed through www.sedarplus.ca/).

12 A detailed methodology can be found in annex 1.

13 HEKS/EPER has contacted Ecosecurities, Carbon Done Right (also as Klimat X) as well as Rewilding Maforki. The former two were not responsive to questions, while there have been several exchanges with Rewilding Maforki. The people the team interacted with for Rewilding Maforki are all listed as part of Carbon Done Right team on their website, as well (accessed 19th April 2019).


15 Interview with representative of Rewilding Maforki, 28th Feb 2024; response to questions received by HEKS/EPER from Rewilding Maforki on 17th April 2024; see also Project documentation prepared by Ecosecurities for Verra Carbon Standard, issued on 16th Dec 2022, p.19.


17 See subchapter 2c for their analysis. The respective lawyers work closely with the Sierra Leone NGOs involved in this research.

18 Sections 11 and 12 CLRA.

19 Sections 11(5), 12(1) and (3) CLRA.

20 Please note that section 11 CLRA speaks about landowning families, not households. According to the Sierra Leone Census of 2015, a household is ‘group of persons who normally eat and live together and recognize a particular person as the head’ [Sierra Leone 2015 Population and Housing Census Analytical Report]. “Family” is defined in the CLRA as “group of persons tracing descent from a common ancestor on the paternal or maternal side or persons who have married into the family”. Families are, hence, typically significantly larger than households.

21 Namati confirmed its presence in these large meetings, together with paramount chiefs, regent chiefs and their representatives. Namati also states that this happened after ‘privately meeting with the landowners’ (email received by Namati on 20th March 2024). Rewilding Maforki provided pictures of meetings and states they have many more such pictures [response to questions received by HEKS/EPER from Rewilding Maforki on 17th April 2024]. It is not contested that such meetings were held.

22 ‘Individual Landowner Lease Agreement’, between Rewilding Maforki and landowner. Copy sent to HEKS/EPER upon request by Rewilding Maforki, received on 17th April 2024.

23 Response to questions received by HEKS/EPER from Rewilding Maforki on 17th April 2024.

24 Ibid.

25 The team went to the Administrator General’s office in Port Loko District who orally said that they have no documents on Rewilding Maforki (20th Feb 2024). The team also visited the Chief Administrator of Port Loko District Council (District Registry) who said that, to his memory, the company never came to register (27th Feb 2024). The Senior District Officer and the District Council confirmed this information (27th Feb 2024).

26 Interview with member of the District Council, 20th Feb 2024.

27 HEKS/EPER, 2024, Questions sent to Ecosecurities, 26th Feb 2024. HEKS/EPER, 2024, Questions sent to Carbon Done Right/ Klimat X, 7th March 2024; in a response to questions received by HEKS/EPER from Rewilding Maforki on 17th April 2024, the company provided a description of the process, but no proof in any of the email communications.


29 See section 28 of Customary Land Rights Act; or for example an article by the Land Portal of 9th Aug 2022 (accessed 25th March 2024)

30 FAO UN, 2016. Free, prior, and informed consent, Manual for Practitioners, (accessed 17th March 2024). While as an international standard FPIC refers more to indigenous communities, both the Sierra Leonean law as well as the Verra standards extend it to all affected communities [Source: Verra, 2023, VCS Standard, v 4.5. (accessed 17.03.2024), p. 43; Section 28 Customary Land Rights Act].


32 Response to questions received by HEKS/EPER from Rewilding Maforki on 17th April 2024; photos provided in this email by Rewilding Maforki do show women present in meetings, but do not provide proof of participation.

33 The few women who participated in the meetings with Rewilding Maforki do show women present in meetings, but do not provide proof of participation.

34 Namati also states that this happened after “privately meeting with the landowners” (email received by Namati on 20th March 2024). Rewilding Maforki provided pictures of meetings and states they have many more such pictures [response to questions received by HEKS/EPER from Rewilding Maforki on 17th April 2024]. It is not contested that such meetings were held.

35 The Senior District Officer and the District Council confirmed this information (27th Feb 2024).

36 Interview with member of the District Council, 20th Feb 2024.

37 FOA UN, 2016. Free, prior, and informed consent, Manual for Practitioners, (accessed 17th March 2024). While as an international standard FPIC refers more to indigenous communities, both the Sierra Leonean law as well as the Verra standards extend it to all affected communities [Source: Verra, 2023, VCS Standard, v 4.5. (accessed 17.03.2024), p. 43; Section 28 Customary Land Rights Act].

38 FAO UN, 2016. Free, prior, and informed consent, Manual for Practitioners, (accessed 17th March 2024). While as an international standard FPIC refers more to indigenous communities, both the Sierra Leonean law as well as the Verra standards extend it to all affected communities [Source: Verra, 2023, VCS Standard, v 4.5. (accessed 17.03.2024), p. 43; Section 28 Customary Land Rights Act].

39 Ibid.

40 Interview with member of the District Council, 20th Feb 2024.

41 Community meeting with women on 21st Feb 2024.

42 Section 31 CLRA.

43 This information by interviewed community members was not contested by Rewilding Maforki in the interview on 28th Feb 2024. It is also confirmed by a signed copy of an ‘Individual Landowners Lease Agreement’, received by Rewilding Maforki response to questions received by HEKS/EPER from Rewilding Maforki on 17th April 2024.


45 Rewilding Maforki, 2024, Principles of Participatory Mapping Activity, document provided to HEKS/EPER, p. 1. Additional photos provided to the team show pictures of meetings, email from Rewilding Maforki received by HEKS/EPER on 3rd July 2023. 
Interview with representative of Rewilding Maforki, 28th Feb 2024.

“Individual Landowner Lease Agreement”, btw. Rewilding Maforki and landowner. Copy sent to HEKS/EPER upon request by Rewilding Maforki, received on 17th April 2024.


Interview with Rewilding Maforki representative, 28th Feb 2024; email received on 13th March 2024; response to questions received by HEKS/EPER from Rewilding Maforki on 17th April 2024. The team of NGOs did not obtain any copy of the overarching agreement by Rewilding Maforki as it is still being worked on.

Discussion with Namnati in Port Loko, 28th Feb 2023; email received from Namnati on 20th March 2024.

Interviews with representative of Rewilding Maforki and with Namnati on 28th March 2024, response to questions received by HEKS/EPER from Rewilding Maforki on 17th April 2024.

In detail, the document claims that Rewilding Maforki “has entered into individual landowner agreements with the applicable landowners for over 25,000 hectares of land”. [Source: Prepayment Agreement among Rewilding Maforki Limited and Earl Resources Limited and Aristeus Projects Limited, dated 25th Feb 2022, p.1. Please note that Earl Resources Limited is the former name of Klimat X (now Carbon Done Right), Aristeus Projects Limited is the former name of Godlington Holdings.]

In detail, the document claims that Rewilding Maforki “has entered into related multi-stakeholder agreements with such chiefdoms for approximately 25,000 hectares of land. … [and has also entered into agreements … (“Individual Landowner Agreements”) for approximately 8,000 hectares of land.” [Source: Klimat X Condensed Interim Consolidated Financial Statements for the three and six months ended June 30, 2022, and 2022, p.12-13]

Video by Carbon Done Right; Klimat X, Projects and Operations, documents for Rewilding Project 1 and Rewilding Project 2; Klimat X press release of 17th April 2023 (all accessed 15th March 2024).

Interview with representative of Rewilding Maforki, 28th Feb 2024; response to questions received by HEKS/EPER from Rewilding Maforki on 17th April 2024. Regarding the 57,000ha, Klimat X, named “by HEKS/EPER from Rewilding Maforki on 17th April 2024. The team of NGOs did not obtain any copy of the overarching agreement by Rewilding Maforki as it is still being worked on.

Discussion with Namnati in Port Loko, 28th Feb 2023; email received from Namnati on 20th March 2024.

Interviews with representative of Rewilding Maforki and with Namnati on 28th March 2024, response to questions received by HEKS/EPER from Rewilding Maforki on 17th April 2024.

In detail, the document claims that Rewilding Maforki “has entered into related multi-stakeholder agreements with such chiefdoms for approximately 25,000 hectares of land. … [and has also entered into agreements … (“Individual Landowner Agreements”) for approximately 8,000 hectares of land.” [Source: Klimat X Condensed Interim Consolidated Financial Statements for the three and six months ended June 30, 2022, and 2022, p.12-13]

Video by Carbon Done Right; Klimat X, Projects and Operations, documents for Rewilding Project 1 and Rewilding Project 2; Klimat X press release of 17th April 2023 (all accessed 15th March 2024).

Interview with representative of Rewilding Maforki, 28th Feb 2024; response to questions received by HEKS/EPER from Rewilding Maforki on 17th April 2024. Regarding the 57,000ha, Rewilding Maforki stated that there “may be further project development in the future but no firm plans … in place yet” (email received by HEKS/EPER on 13th March 2024).

Legal opinion provided to HEKS/EPER by Rewilding in an E-mail on May 2nd, 2024.

Stipulated in paragraphs 2, 5, 10 and 11 of the Second Schedule to the CLRA (quote from paragraph 2).

Email received by HEKS/EPER on 16th March 2024.

Project documentation prepared by Ecoservices for Verra Carbon Standard, issued on 16th Dec 2022, p.13.; see also Carbon Done Right, 2024, Sierra Leone, Rewilding Project 1 (accessed 18th March 2024).

Ryan, Caitlin, 2018, Large-scale land deals in Sierra Leone at the intersection of gender and lineage, Third World Quarterly, 39:1, pp. 189-206 (accessed 18th March 2024).

Ruling C.C. 156/18 of the High Court of Sierra Leone Land and Property Division, between the plaintiff Kasseh (formerly Burreh Kasseh Maconteh) Chiefdom Council and the 1st defendant Sierra Leone Agriculture Limited, the judgement has the full force of the law.

The majority of Rewilding Maforki is currently held by the president of Carbon Done Right, Kevin Godlington (holding at least 26% of the shares of Rewilding Maforki, together with his wife and people with his surname through Godlington Holdings Ltd (former Aristeus Projects Ltd), based in the UK), and Neil James Passmore (owning at least 25% through 662 Ventures Ltd, based in the UK). The structure of the companies around Rewilding Maforki is convoluted and the other 49% of ownership remain opaque. [Sources: Letter by solicitors, Sierra Leone Corporate Registry, dated 19th June 102023; Confirmation statement, Companies House, UK, dated 4th Sept 2023; Confirmation statement, Companies House, UK, dated 7th July 2023.]

When Rewilding Maforki was registered, a Sierra Leonean citizen was the force of the law. [Source: Memorandum and Articles of Association, dated October 2021, Sierra Leone Corporate Registry]. Because 49% of the current ownership of Rewilding Maforki is unknown, it is uncertain if the Sierra Leonean citizen still holds shares. He does have a holding together with Godlington, based in the UK [Certificate of Incorporation, dated 7th July 2023, Companies House].

The Oakland Institute, 2011, Understanding Land Investment Deals in Africa – Country Report: Sierra Leone; Baxter, Joan, Billionaires at play in the fields of the poor (part 5): Chinnakan-nath Sivasankaran, published on website on 4th Sept 2013, Deed of surrender, signed on 24th April 2010, for the lease agreement in question is signed by Kevin Godlington (this document surrendered a first lease from 22nd April 2009 and was followed by another lease with an identical area on 14th May 2010).

Apart from holding a majority in Rewilding Maforki together, both Godlington and Passmore also hold at least 10% of carbon trader Carbon Done Right and are part of the executive team [Source: Carbon Done Right. 2024. Our Team. (accessed 18th March 2024), Information Circular by Klimat X, dated 6th April 2023 (accessed through www.sedarplus.ca, 15th March 2024)],

Klimat X Condensed Interim Consolidated Financial Statements for the three and six months ended June 30, 2023 and 2022, p.11, Prepayment Agreement among Rewilding Maforki Limited and Earl Resources Limited and Aristeus Projects Limited, dated 25th Feb 2022; p.1. response to questions received by HEKS/EPER from Rewilding Maforki on 17th April 2024]

Lease agreements between land owning families of the Chief doms, Port Loko District, and Sierra Organic Palm Ltd from December 2021. Obtained by HEKS/EPER.

Sierra Organic Palm is directed by Kevin Godlington [Source: Memorandum and Articles of Association of Sierra Organic Palm Ltd, dated 8th October 2019, Sierra Leone corporate registry]. Also, 25% of it is owned by Sierra Palm B.V. [Source: Memorandum and Articles of Association of Sierra Organic Palm Ltd, dated 8th October 2019, Sierra Leone corporate registry]. Sierra Palm B.V. in turn is owned fully by Planting Naturals B.V., both registered in the Netherlands [Source: data retrieved from Orbis, June 2023]. Planting Naturals B.V. is executive directed by Kevin Godlington [Source: data retrieved from business register of the Netherlands, 2023; website of Planting Naturals (accessed 26th March 2024)].

Letter to a landowner by Sierra Organic Palm Ltd, Subject: Notice to Surrender Lease Agreement, Dec 2023. Obtained by HEKS/EPER.

Statement in a community meeting on 21st Feb 2024.

See Box: Customary Land Rights Act and FPIC.

Project documentation prepared by Ecoservices for Verra Carbon Standard, issued on 16th Dec 2022, pp.4, 12, 13, 25; see also Carbon Done Right, 2024, Sierra Leone, Rewilding Project 1. (accessed 18th March 2024).

Interview on 22nd April 2024.

While the men were very clear on that in the community meetings, some women said they did not use these lands. It needs to be considered that women were often not aware of the lands claimed by Rewilding Maforki.

Response to questions received by HEKS/EPER from Rewilding Maforki on 17th April 2024.

Interview by phone, Ministry of Agriculture in Port Loko, 1st March 2024.

Community meetings on 21st Feb 2024.
Interview with Rewilding Maforki representative, 28th February 2024.

Ibid. on 17th April 2024.

Interview with Port Loko District Council member, 20th February 2024.

Klimat X, Condensed Interim Consolidated Financial Statements for the three and six months ended June 30, 2023, and 2022, p. 13. It remains unclear who owns the remaining 49% of rights over all biological asset rights and revenues, but regarding carbon produced Carbon Done Right holds 100% [Response to questions received by HEKS/EPER from Rewilding Maforki on 17th April 2024].

A total of 3'505'000 USD is given with the following transactions alone: 1,500,000 USD paid by BP Carbon Trading [Source: Klimat X press release of 8th Jan 2024], 1,000,000 USD more to follow [Source: Klimat X press release on 15th June 2023 and press release of 18th Dec 2023], an advance of 1,195,000 USD [see following footnote], shares of Klimat X for Rewilding Maforki valued at 810,000 USD at the time of the transaction [Source: Klimat X Consolidated Financial Statements for the year ended December 31, 2022 and 2021, from Canadian Dollars to USD, conversion with exchange rate of Oanda, 24th June 2022, p. 5]. This makes a total of 3'505,000 USD with these transactions alone.

In the prepayment agreement between Rewilding and Klimat X, they state the estimated costs of the project at 40,000,000 USD [Source: Prepayment Agreement among Rewilding Maforki Limited and Earl Resources Limited and Aristeus Projects Limited, dated 25th Feb 2022]. Carbon Done Right gave an advance of 1,195,000 USD to Rewilding Maforki to help start the project in Port Loko [Source: Klimat X Condensed Interim Consolidated Financial Statements For the three and six months ended June 30, 2023 and 2022, p. 12].

Assumption: The life span of the project is to be 50 years here. This is the number given on the project documentation on the Klimat X website (accessed 26th March 2024). Over the lifespan of the project, it has purportedly the potential to produce 15 million tonnes of credits from the entire area. Carbon Done Right expects a pricing of 20-30 USD/t, resulting in sales of 300-450 million USD. Divided by the number of hectares (25,000 ha) and the assumed lifespan, this leads to the expected revenue per ha and year. [Calculation based on: Klimat X Condensed Interim Consolidated Financial Statements for the three and nine months ended September 30, 2023 and 2022, pp 15, 18]

Klimat X spent almost 1.5 million USD in 2022 on related party transactions, means payments that incurred "with directors and companies controlled by Directors of the Company" [Source: Klimat X Consolidated Financial Statements for the year ended December 31, 2022 and 2021, from Canadian Dollars to USD, conversion with exchange rate of Oanda, 30th Sept 2023].

Klimat X spent almost 1.5 million USD in 2022 on related party transactions, means payments that incurred "with directors and companies controlled by Directors of the Company" [Source: Klimat X Consolidated Financial Statements for the year ended December 31, 2022 and 2021, from Canadian Dollars to USD, conversion with exchange rate of Oanda, 31st Dec 2022, p. 28, confirmed with simplywall database]