BRIEFING: Over 70% of all carbon credits recently retired in Brazil are problematic

Major international corporations across sectors utilizing problematic offsets from Brazil-based projects

In June 2025, Corporate Accountability released its assessment of the world's largest carbon offset projects in 2024 in its report "Built to Fail?".[1] The research revealed that despite ongoing "reforms" of the voluntary carbon market (VCM), more than 47.7 million problematic offsets credits were retired through 43 of the world's largest offset projects in 2024—a volume that represents nearly one-quarter of the entire VCM in 2024.

This research provided a critical snapshot into the VCM and its effectiveness in a moment of great urgency. Carbon markets and carbon offsets continue to be consistently promoted and utilized by world policymakers and the private sector as a central pillar of climate action. This remains the case even though the VCM has failed to correlate with a decrease in global greenhouse gas (GHG) emissions for decades.[2] [3] Independent research from various experts around the world continues to repeatedly expose the flaws, failures, and harm associated with the voluntary carbon market.[4]

At the time of this research release, COP30 (the current round of U.N. climate talks that began on November 10, 2025 in Belém, Brazil) recently came to a close. Before it even began, the stage had already been set for carbon markets and related schemes to feature heavily in the various developments expected out of COP30,[5] [6] while meaningful forms of public climate finance continue to be systematically withheld by Global North countries and other actors that are refusing to pay their climate debt. Similarly, progress on justly phasing out fossil fuels is not even close to reflective of the urgency that science and lived experience clearly shows is needed.

This briefing expands upon the findings of "Built to Fail?" and looks specifically at the largest carbon offsets projects located in Brazil, the host country of COP30, and what publicly available information from VCM industry actors suggests about these projects' ability to meaningfully reduce GHG emissions. Many of the largest offsets projects in Brazil

are also some of the largest offsets projects in the VCM globally. For example, last year, Pacajai REDD+ was the world's seventh largest project by credits retired[7]— so whether they can be counted on to meaningfully reduce emissions has great import on regional and global climate action. In addition, this research reveals some of the largest and most internationally recognized corporate buyers of offsets from these projects.

As this research underscores, the majority of the largest carbon offset projects located in Brazil are not a reliable way to decrease global GHG emissions, and therefore should not be used by corporations or other actors as a means to achieve their emissions-reducing pledges and activities.

Nearly 75% of credits from top 50 carbon offsets projects in Brazil are "problematic" and should not be relied upon to deliver emissions cuts

As of November 2025, Brazil is home to nearly 300 active carbon offset projects that range from forestry and land use, renewable energy, and waste disposal, to energy efficiency, carbon capture, and others.

According to data on AlliedOffsets Database,[8] 136 of these active projects in Brazil retired a total of 22.2 million credits between Jan 2024–June 2025. This research focuses on the top 50 of these projects by volume of credits retired, which make up 95% (21.2 million) of all credits retired in Brazil during this period.

Of these top 50 projects, 32 projects (or 64%) are problematic, meaning that they should not be relied upon to reduce their promised emissions reductions. These projects and their associated offsets are deemed problematic because they are rated by the VCM industry-aligned BeZero ratings agency to have a "moderate," "moderately low," "low," "very low," or "lowest" likelihood of "achieving 1 tonne of CO2e avoidance or removal,"[9] and/or because they were assessed and rejected by the Core Carbon Principles[10] (see Methodology). Table 1 below lists these 32 problematic projects located in Brazil and the number of credits retired from them between Jan 2024–June 2025. Collectively, these projects retired 15.7 million offsets during this period, representing 71% of all offsets retired in Brazil during that period.

Table 1: Thirty-two of top 50 carbon offset projects in Brazil issued problematic credits that should not be relied upon to reduce emissions

Project rank by volume of credits retired	Project name	Credits Retired (Jan 2024-June 2025)	BeZero rating	CCP rejected?	Problematic?
1	The Envira Amazonia Project - A Tropical Forest Conservation Project in Acre, Brazil	3,131,638	BBB		Yes
2	Pacajai REDD+ Project	2,294,674	C		Yes
4	Brazilian PoA for NAMA incentivized NCRE Projects	1,162,266	No	Rejected	Yes
5	BAESA Project	1,133,284	C	Rejected	Yes
6	Foz do ChapecÃ³ Project	1,089,300	C	Rejected	Yes
7	Grid connected electricity generation from renewable source: Windfarm Complex UniÃ£o dos Ventos, Serveng Civilsan S.A.	1,039,155	No	Rejected	Yes
8	VTRM Renewable Energy	778,937	No	Rejected	Yes
9	Manoa REDD+ Project	688,154	BBB		Yes
11	UNITOR REDD+ PROJECT	590,873	BBB		Yes
15	VTRM Renewable Energy 2	365,812	B	Rejected	Yes
16	Ecomapua Amazon REDD Project	335,405	C		Yes
17	ABC Norte REDD Project	294,821	BB		Yes
18	FLORESTAL SANTA MARIA PROJECT	291,476	C		Yes
19	JARI/AMAPÃ REDD+ PROJECT	272,228	B		Yes
22	Cikel Brazilian Amazon REDD APD Project Avoiding Planned Deforestation	208,428	BB		Yes
23	Avoided Conversion Cerrado	204,108	BBB		Yes
25	The Valparaiso Project	189,552	B		Yes
28	RMDLT Portel - Para REDD Project	166,612	C		Yes
29	ARAPUtanga Centrais ELÃ©tricas S. A. - ARAPUCEL - Small Hydroelectric Power Plants Project	156,341	No	Rejected	Yes
31	Cenol and Telha Forte Ceramics Switching Fuel Project	153,538	No	Rejected	Yes
33	Agrocortex REDD Project	133,796	C		Yes
34	The Serra do Amolar REDD+ Project	129,131	BB		Yes
35	Rio Anapu-Pacaja REDD Project	113,597	BB		Yes
36	Jirau Hydro Power Plant	110,750	No	Rejected	Yes
37	The Russas Project	110,698	B		Yes
38	Engenheiro Ernesto Jorge Dreher and Engenheiro Henrique Kotzian SHPs VCS Project (JUN1120)	104,615	No	Rejected	Yes
40	Curva dos Ventos Wind Farms	98,896	No	Rejected	Yes
42	Delta do ParnaÃba Wind Power Plant Complex CDM Project Activity.	80,816	No	Rejected	Yes
43	FundÃ£o-Santa Clara Energetic Complex Project (FSCECP)	78,743	No	Rejected	Yes

45	Electricity generation from renewable sources - Windfarms Santa Clara I, Santa Clara II, Santa Clara III, Santa Clara IV, Santa Clara V, Santa Clara VI and Eurus VI	70,298	No	Rejected	Yes
46	MaÃsa REDD+ Project	69,087	D		Yes
50	ESTRE Pedreira Landfill GÃ¡s Project (EPLGP)	60,145	No	Rejected	Yes
	Total	**15,707,174**			

Source: Analysis by Corporate Accountability using data from AlliedOffsets Database, BeZero Ratings, and Core Carbon Principles. Ratings accurate as of November 2025.[11]

Verra hosts majority of problematic projects, but is not alone

Verra, the world's largest carbon offsets registry, hosts the majority (23) of these 32 problematic projects (see Table 2), accounting for 12.8 million carbon offsets retired between Jan 2024–June 2025. Verra continues to receive significant criticism for repeated integrity concerns[12] [13] [14] [15] despite recent attempts to assure investors that loopholes are being closed.[16]

The remainder of the nine projects (accounting for 2.9 million offsets retired in this period) are hosted by the Clean Development Mechanism (CDM). The CDM has a notorious history of hosting projects that lack real, measurable, and additional emissions reductions and has even been estimated to actually increase global emissions by 6.1 billion tonnes of carbon dioxide through its approval of empty offsets.[17]

Table 2: Verra and CDM share hosting of the 32 problematic projects based in Brazil

	Credits Retired (Jan 2024-June 2025)
Verra	**12849764**
Forestry and Land Use	**9224278**
REDD	9020170
The Envira Amazonia Project - A Tropical Forest Conservation Project in Acre, Brazil	3131638
Pacajai REDD+ Project	2294674
Manoa REDD+ Project	688154
UNITOR REDD+ PROJECT	590873
Ecomapua Amazon REDD Project	335405
ABC Norte REDD Project	294821
FLORESTAL SANTA MARIA PROJECT	291476
JARI/AMAPÃ REDD+ PROJECT	272228
Cikel Brazilian Amazon REDD APD Project Avoiding Planned Deforestation	208428
The Valparaiso Project	189552
RMDLT Portel - Para REDD Project	166612

Agrocortex REDD Project	133796
The Serra do Amolar REDD+ Project	129131
Rio Anapu-Pacaja REDD Project	113597
The Russas Project	110698
MaÃsa REDD+ Project	69087
AcoGS	204108
Avoided Conversion Cerrado	204108
Renewable Energy	**3471948**
Hydro	2327199
BAESA Project	1133284
Foz do ChapecÃ³ Project	1089300
Engenheiro Ernesto Jorge Dreher and Engenheiro Henrique Kotzian SHPs VCS Project (JUN1120)	104615
Wind	1144749
VTRM Renewable Energy	778937
VTRM Renewable Energy 2	365812
Energy Efficiency/Fuel Switching	**153538**
(blank)	153538
Cenol and Telha Forte Ceramics Switching Fuel Project	153538
Clean Development Mechanism	**2857410**
Renewable Energy	**2797265**
Wind	1289165
Grid connected electricity generation from renewable source: Windfarm Complex UniÃ£o dos Ventos, Serveng Civilsan S.A.	1039155
Curva dos Ventos Wind Farms	98896
Delta do ParnaÃba Wind Power Plant Complex CDM Project Activity.	80816
Electricity generation from renewable sources - Windfarms Santa Clara I, Santa Clara II, Santa Clara III, Santa Clara IV, Santa Clara V, Santa Clara VI and Eurus VI	70298
Solar, Wind	1162266
Brazilian PoA for NAMA incentivized NCRE Projects	1162266
Hydro	345834
ARAPUtanga Centrais ELÃ©tricas S. A. - ARAPUCEL - Small Hydroelectric Power Plants Project	156341
Jirau Hydro Power Plant	110750
FundÃ£o-Santa Clara Energetic Complex Project (FSCECP)	78743
Renewable Energy, Waste Disposal	**60145**
Biomass Energy, Landfill Gas	60145
ESTRE Pedreira Landfill GÃ¡s Project (EPLGP)	60145
Grand Total	**15707174**

Source: Analysis by Corporate Accountability using data from AlliedOffsets Database, BeZero Ratings, and Core Carbon Principles.

Major international corporations across sectors utilizing problematic offsets from Brazil-based projects

Some of the world's largest corporations and major industry players have retired offsets from these problematic projects in 2024 and 2025. Table 3 summarizes some of the most internationally recognized "household name" corporations and the volume of offsets they retired between Jan 2024 –June 2025 to count towards their respective emissions reductions.

Multiple oil and gas industry frontrunners made vast use of these problematic projects. Petrobras retired nearly 200,000 credits from these problematic projects in Brazil during this period. Shell retired approximately 66,500 credits, and Equinor nearly 21,000. Multiple consulting firms also utilized these problematic offsets, including EY (nearly 179,000 credits), BCG (around 90,000 credits), and KPMG and Deloitte (both retiring around 5,500 credits).

Table 3: Sample of major corporations that utilized problematic credits from Brazil-based projects between January 2024 and June 2025.

Name of corporation	Sum of credit volume retired (Jan 2024-June 2025)
Petrobras	199718
EY	178978
BlackRock	137039
BCG	90393
Shell	66484
Barilla	33555
Philip Morris	28232
Equinor	20933
Uber	15913
SWIFT	14786
Mastercard	11447
S&P Global	8000
KPMG	5585
Deloitte	5453
Engie	2485
Yamaha Motor	1947
Dell	1388
Grand Total	**822336**

Source: Data from AlliedOffsets Database

Bottom line: Why are problematic offsets in Brazil and elsewhere still being relied upon for something they cannot deliver?

This briefing reinforces the key message of the "Built to Fail?"[18] report released earlier this year: that evidence shows that carbon offsets and the VCM continues to be an unreliable form of climate action. Though the VCM has gone through multiple rounds of "reforms" and "updates," research and data by global experts continues to show that they are not enough to plug the hole in a sinking ship.

Whether in Brazil or elsewhere in the world, evidence continues to suggest that the top carbon offsets projects are not a proven, meaningful, and permanent pathway to global emissions reductions.

Coming out of COP30, VCM investors and supporters must reckon with critical questions to find the way forward through the climate crisis, such as:

- Why are so many projects that even VCM industry actors assess as unlikely to deliver emissions reductions still so popular?
- Why are VCM buyers and policymakers taking on such liability to participate in the VCM?
- Who is responsible for the repeated failure of 'checks and balances' within the VCM?
- Why try to solve a global crisis with a framework that inflicts further inequity and harm?

Methodology

1) The top 50 offsets projects by volume of credits retired based in Brazil for the period Jan 2024 –June 2025 were determined using data on AlliedOffsets Database.
2) Projects that, at the time of research (November 2025), had public BeZero ratings of BBB or less had a "moderate," "moderately low," "low," "very low," or "lowest" likelihood of "achieving 1 tonne of CO2e avoidance or removal,"[19] according to BeZero.[20] These projects and associated offsets were determined to be "problematic," as they are unable to ensure that compensation of emissions actually occurs. For more detail on this methodology and rationale, as well as limitations and assumptions of this approach, please consult the Methodology on page 36 of "Built to Fail?".[21]
3) For this briefing, projects that have also been assessed and rejected by the industry's Core Carbon Principles[22] were also considered "problematic." While this is not an endorsement of the Core Carbon Principles, or BeZero's methodology, both are frequently used by a variety of VCM industry actors and, in our experience, are generally acknowledged across VCM stakeholders to be among the more respected industry assessments of offsets performance.

Communicating directly with the actors listed in this publication was outside the scope of this research and, in our experience working with a multitude of civil society allies, is not a common, standardized practice for civil society writ-large, though we do encourage any press covering this research to do so. We also welcome those listed in this publication to share with us any information or evidence that can clarify exactly how the efficacy and environmental integrity of these voluntary carbon market offsets are assured; or to provide verifiable information that sheds light on the questions and concerns posed in this research.

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