

Carbon Credits Under Fire

Myanmar, Crimes Against Humanity, and the Crisis of Credibility Facing the UN's "High-Integrity" Carbon Markets



On 1 February 2021, Myanmar's military staged an attempted coup in an effort to seize power across the country and overthrow the democratically elected government, which had been voted into power just three months earlier. This triggered nationwide mass demonstrations which were violently suppressed by the armed forces, and escalated longstanding conflicts into a full-blown and bloody civil war that has so far claimed the lives of **nearly 100,000 people** and displaced **almost four million**.

The conflict has been characterised by **brutal war crimes and crimes against humanity**, and the actions of the military junta have compounded an **existing human rights and humanitarian crisis**. An arrest warrant has been **issued by the International Criminal Court** against Senior General Min Aung Hlaing, the head of the junta, for crimes against humanity committed against Myanmar's Rohingya Muslim minority, and a case has also been **brought to the International Court of Justice** against the junta over charges of genocide.

Many things have changed in Myanmar since the attempted coup, but one thing has not: one month before it happened, a carbon

offsetting project led by the South Korean NGO Climate Change Center (CCC) began generating credits for the UN's new international carbon offsetting scheme, and has continued to do so ever since. The project distributed improved cookstoves to households, allowing it to generate carbon credits by claiming that more efficient stoves reduce firewood consumption and therefore emissions, allowing those estimated reductions to be sold through UN-linked carbon market platforms. However, implementation occurred in some of the country's most conflict-affected regions, and through a government department now under the illegal control of the junta.

In fact, not a single reference is made to the attempted coup, the military junta, or the conflict in any of the project's monitoring reports in the past five years. Whilst the junta attacked civilians, **companies such as** Korea Electric Power Corporation, SK Group, and Industrial Bank of Korea, offset their emissions by purchasing credits generated by households literally in the firing line.

As the world condemned the horrific human rights abuses perpetrated by Myanmar's military junta, imposed sanctions on key figures, and sought to bring aid to impacted civilian populations, CCC quietly kept working with the Ministry for Environment and Natural Resources (MONREC) as if

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nothing had happened. MONREC is the project implementation partner,¹ responsible for distributing stoves and monitoring their use. It has answered to the military junta since the attempted coup, and has operated under international sanctions over its role in bringing in resources and revenue that have sustained the junta's atrocities.

The military has **systematically used the blockage of aid, food and other resources** to control civilian populations and punish them for their opposition to the coup. The UN's Special Rapporteur on the situation in Myanmar has **pointedly stated that** "...the junta has chosen to use aid as a weapon", and numerous civil society

groups **have also warned** about the junta's weaponisation of aid.

Whilst it handed out cookstoves with one hand, the junta forced hunger on its civilian populations with the other. Rather than addressing the structural causes of deforestation and carbon emissions, CCC's project, with the financial backing of South Korean corporations, reinforces the structures of abuse—including **sexual and gender-based violence**—and lends legitimacy to the military junta, which further emboldens it to commit atrocities.

Now, more than five years on from the attempted coup, the project is the **very first to be cleared for crediting** under

the Paris Agreement's flagship international carbon market system, designed to allow corporations and governments to offset their emissions through purchasing so-called "high integrity" carbon credits.

This briefing explores the serious governance concerns surrounding CCC's cookstoves project, including its implementation in areas affected by civil conflict, links to institutions operating under Myanmar's military junta, and the use of credits in international compliance systems. It asks the question: if this is the first project to be credited, what can we expect from the thousands more in the pipeline?

Taking off(sets): The Paris Agreement Crediting Mechanism (PACM)

Global carbon offset markets are rapidly expanding as governments and corporations increasingly rely on carbon credits to meet global climate targets and corporate climate commitments, which are already totally insufficient and unenforceable as it is. As Article 6.4 of the Paris Agreement—the section of the agreement which governs international carbon offset markets—moves from negotiation to implementation through the PACM, the integrity and durability claims of carbon crediting mechanisms must be closely scrutinised.

The "**more rigorous requirements**" of the Article 6.4 mechanism were designed to operationalise a new generation of international carbon markets through improved oversight and accountability, following the failure of the Kyoto Protocol's Clean Development Mechanism (CDM) and earlier offset systems to live up to expectations. Whilst international carbon markets have created vast opportunities for profit-making, the **primary beneficiaries** are polluters and market makers rather than communities at the frontlines of climate change.

Thousands of CDM projects are now eligible to issue credits under the PACM, raising concerns about whether tweaks to accounting methodologies will be sufficient to resolve longstanding problems surrounding overcrediting, transparency, monitoring and accountability, and their **tendency to replicate structural inequities** that result in gender and socio-ecological impacts.

Initial results do not look good: **Carbon Market Watch estimates that** for the first batch of carbon credits set to be released under Article 6.4, only one in every 26 is likely to represent real emission reductions. This means that the vast majority of credits will not offset the emissions from fossil fuels and other sources that they are intended to. Rather, carbon markets allow continued pollution elsewhere, and incentivise profit-making over genuine emissions reductions.

¹ Another department also under the control of the military junta, the Ministry of Agriculture, Livestock and Irrigation (MOALI) is also listed as the implementation partner in some documentation.

From Sagaing to Seoul: Improved cookstoves credits generated in Myanmar, traded in South Korea

In February 2026, the UN issued the first carbon credits under the Paris Agreement Crediting Mechanism (PACM), generated by an improved cookstove project in Myanmar (PoA 10471) that had transitioned from the CDM. The project involved the distribution of hundreds of thousands of ceramic cookstoves that are intended to replace traditional three-stone cooking methods.

According to the project's developers, the logic is simple: the improved ceramic stoves are more efficient than traditional methods, so households will burn less wood as a consequence, resulting in lower emissions. As co-benefits, less fuel use improves the lives of women and girls by improving indoor air quality and reducing the burden of fuel collection. The reality, however, is far more complex.

The project's coordinating entity is South Korean NGO Climate Change Center (CCC), which operates two international carbon credit projects, one in Myanmar and one in Ghana. According to CCC's 2024

Sustainability Report, the project in Myanmar is being carried out with the collaboration of three large South Korean multinationals: SK Group, Industrial Bank of Korea and Korea Electric Power Corporation. Credits generated by the project under the CDM were previously traded on the South Korean Emissions Trading System (K-ETS), and **analysis conducted by Plan 1.5** and Carbon Market Watch found that the project had overcredited at a rate of 14 to one. In other words, 14 times more credits were issued by the project than should have been.

The project is being implemented across 54 sites in nine regions, clustered in the Irrawaddy Delta and central Dry Zone. The project's first six implementation sites cover 27 townships in Sagaing, Magway and Mandalay Regions in the central Dry Zone, and the remaining 48 implementation sites cover numerous townships in Ayeyarwady Region, Yangon Region, Bago Region, Mon State, Nay Pyi Taw Union Territory and Shan State in southern and eastern parts of the country.

The project was authorised by the Government of Myanmar before the attempted coup under the National

A ceramic cookstove similar to the type distributed by the project. These stoves are around 27% efficient under laboratory conditions. **Myanmar Policy Institute**

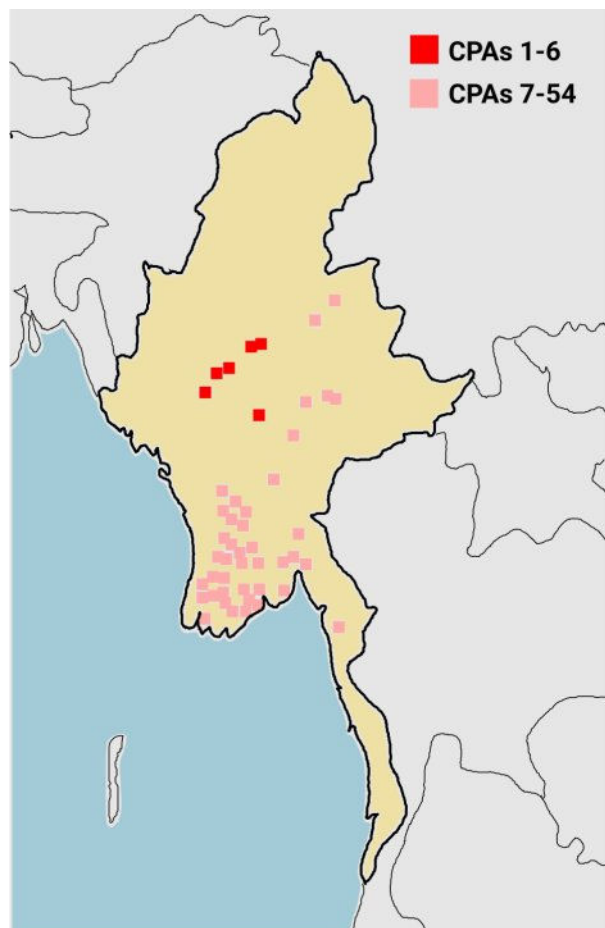


Figure 1: Map of project implementation sites.

An implementation partner under international sanctions

On the day after the attempted coup, Colonel Khin Maung Yi was appointed minister for MONREC, having been Permanent Secretary in the department under the democratically elected government. MONREC is responsible for the management and exploitation of Myanmar's natural resources, playing a crucial role in the exploitation and trade of resources such as gemstones, other mineral resources, and forestry.

In June 2021, the European Union (EU), alongside a number of countries, **imposed sanctions** on Khin Maung Yi and a number of state-owned enterprises falling under MONREC's control, for contributing "to the funding of the military regime" and therefore being "responsible for undermining democracy and the rule of law in Myanmar/Burma". Colonel Khin Maung Yi was replaced in April 2026, having served as MONREC minister for all but one month of the cookstove project's full programme of activities.

Justice for Myanmar spokesperson Yadanar Maung described how "MONREC is a ministry under the control of the sanctioned junta, led by sanctioned war criminals. It is a major income earner for the junta, bringing in foreign currency and revenue it needs to sustain its nationwide terror campaign. MONREC plays a crucial role in the junta's illegal trade of timber, minerals, gems and pearl, among other resources. Partnering with MONREC in a project tied to international carbon market mechanisms lends false legitimacy to the military junta and whitewashes its international crimes."

League for Democracy government, and lists the Dry Zone Greening Department (DZGD) as the local implementation partner in sites in the central Dry Zone, and government departments more generally in other implementation sites. DZGD falls under the Ministry of Natural Resources and Environmental Conservation (MONREC), which has been under the illegal control of the military since the attempted coup.

The recent issuance of credits under PACM covers the project's second

monitoring period (1st January 2021 to 31st May 2022), which began one month before the attempted coup, and includes all 54 implementation sites. The full "program of activities" for which credits will be issued under subsequent monitoring periods runs from 1st January 2021 to 31st December 2025, although the first six implementation sites in the Dry Zone have not been included in subsequent monitoring reports, suggesting that the project was discontinued there, or could not be effectively monitored or verified.

However, CCC's **2024 Annual Report** includes interviews with both Mr. Ba Kaung, Deputy Director General of the Dry Zone Greening Department (DZGD) and Dr. San Win, Director General of the Ministry of Environment Conservation Department (ECD) under the Ministry of Natural Resources and Environmental Conservation (MONREC), suggesting ongoing implementation in the Dry Zone beyond June 2022.

Crediting under CDM	Crediting under PACM		
31 Aug 2019 - 31 Dec 2020: First monitoring period for all 54 implementation sites, credited under the CDM.	01 Jan 2021 - 31 May 2022: Second monitoring period for all 54 implementation sites, credited under the PACM. First PACM credit issuance relates to this period.	01 Jun 2022 - 31 May 2023: Third monitoring period for sites 7-54 only, likely to be credited under the PACM in future.	01 Jun 2023 - 31 Dec 2025: Anticipated fourth monitoring period for sites 7-54 only, likely to be credited under the PACM in future. Documentation not yet publicly-available.



Figure 2: Timeline for project PoA 10471 monitoring and crediting periods.

CCC's **financial reports** indicate that in 2021, the year of the attempted coup, income from its Myanmar cookstoves project totaled 1.3 million Euros, accounting for 37% of its total income. By 2024 (the most recent available figures), it received an annual income of **six million Euros** from the project, accounting for almost 80% of its total income that year. Whilst the value of carbon credits in the South Korean K-ETS has fluctuated, it is expected that they will trade at higher rates under the PACM due to the "high integrity" label, making it likely that income from this project will increase. There is no

publicly available information on what proportion of CCC's income from this project has been transferred to MONREC, its subdivisions, or other

departments under the control of the military junta, and CCC has failed to respond to requests to provide this information.

Year	Myanmar project income (millions of Euros)	Total income (millions of Euros)	Proportion of total
2021	1.23	3.35	37%
2022	1.67	3.51	48%
2023	6.03	7.98	76%
2024	5.95	7.56	79%

Figure 4: Income reported by CCC from Myanmar CDM project compared to the organisation's total income. Source: **CCC financial reporting**.

Is SK Group profiting from selling sanctioned Russian oil in Myanmar?

SK Group's support for CCC's clean cookstoves project dates back to 2019. In the same year, the company **bought a 35% stake** in one of Myanmar's biggest oil distribution companies, valued in its **2024 Annual Report** at 127 million Euros. In 2022, Best Oil was **one of four private companies** involved in a 10-member committee set up by the military junta to facilitate the purchase, storage and distribution of sanctioned Russian oil, and the military junta recently **signed a new oil agreement** with Russia, in April 2026. In other words, at the same time as SK Group has been offsetting its emissions using carbon credits generated by the cookstoves project, it is very likely to have been profiting from the sale of Russian oil in Myanmar, which was under international sanctions for war crimes committed following the invasion of Ukraine.

A bombing in a Myanmar Township. **Chun Nrein/Wikimedia Commons**



Communities in the firing line: Conflict rages in the Dry Zone

Although violence and conflict as a result of the junta's actions has impacted the country nationwide since the attempted coup, the central Dry Zone has been one of the worst hit. Sagaing Region, in particular, once known for its agricultural heartlands and relative peace, has borne the brunt of the military's violence.

The region has witnessed intense armed resistance by anti-coup forces against the military junta, and the junta has responded with airstrikes, arson attacks, and mass killings. From February 2021 to April 2024, Sagaing Region recorded more than 17,000 security incidents involving anti-coup forces, including armed attacks and demonstrations that have been brutally repressed, the highest number across Myanmar. While attempts have been made to set up alternative

governance and security forces to control areas in Sagaing, most regions are still contested and lack functional public services and stability.²

Data provided by **ACLED (Armed Conflict Location & Event Data)**, an independent, impartial global monitor that collects, analyses, and maps data on conflict and protest, shows the extent to which the project implementation areas in the Sagaing, Mandalay and Magway Regions of the

Dry Zone have been impacted (see Figure 2). In the 27 Dry Zone townships during the year-and-a-half monitoring period for which the UN has just agreed issuance of credits (1st January 2021 to 31st May 2022), there were 1,153 acts of political violence involving armed groups,³ 298 of which were perpetrated by the military junta against civilians. There were 41 instances of artillery fire and missile strikes, and nine air or drone strikes, such as on 26th February

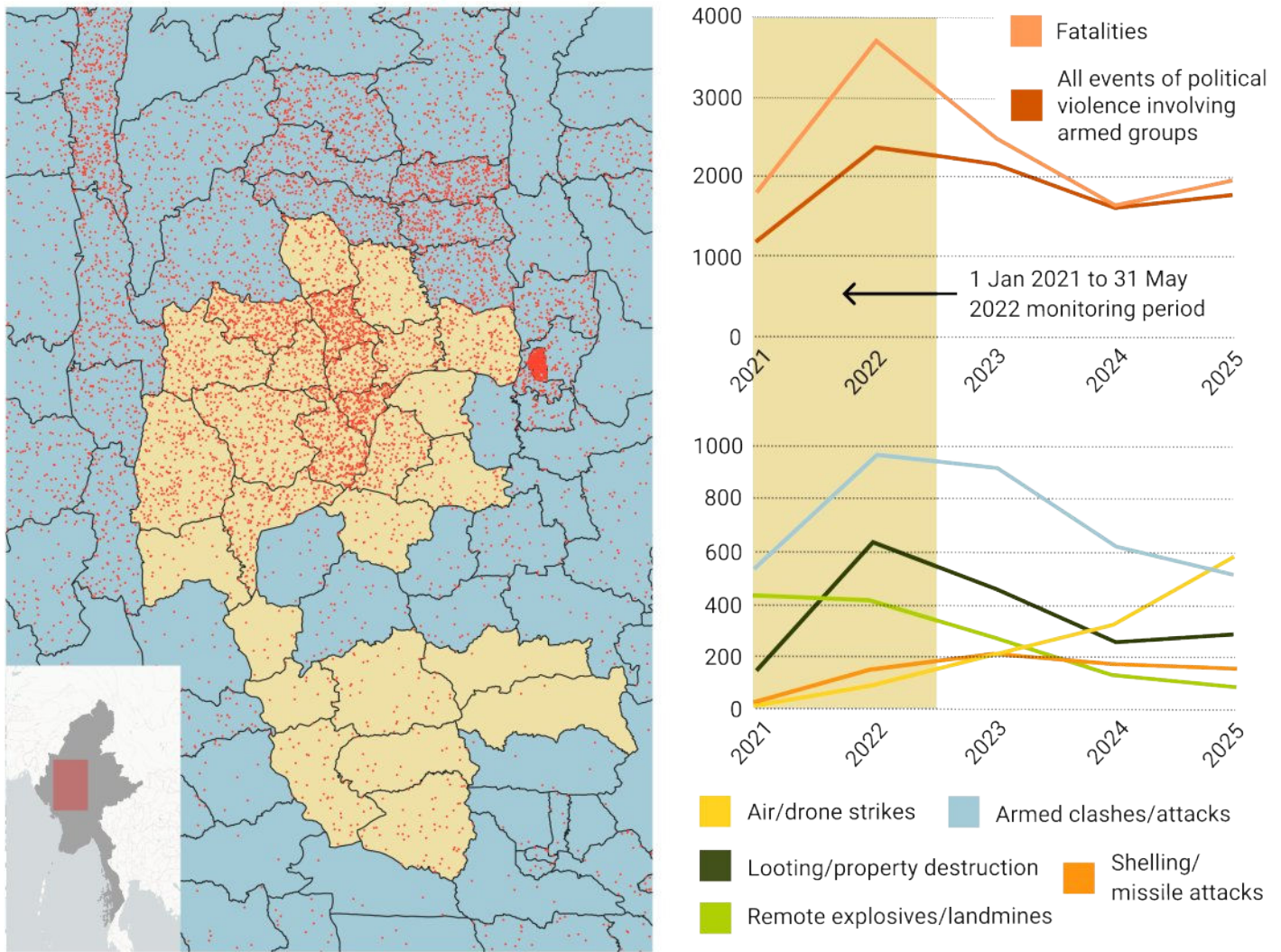


Figure 5: Political violence involving armed groups in the 27 townships (yellow) included in CPAs 1-6. The map on the left shows the locations of events of political violence (red dots) during the 01 Jan 2021 to 31 May 2022 monitoring period. Event locations are randomised within the townships due to a lack of specific location data. The graphs on the right show the number of events of political violence per year for the project's whole "Program of Activities", 2021-2025, with the 01 Jan 2021 to 31 May 2022 monitoring period highlighted in yellow. Source: **ACLED conflict data**. Map created by Will Roper.

² Myanmar Policy Institute (2024), Political & Security Analysis and Stakeholders Mapping of Sagaing Federal Unit.

³ Categories of conflict type included in this figure: Abduction/forced disappearance, Air/drone strike, Armed clash, Attack, Grenade, Looting/property destruction, Remote explosive/landmine/IED, Shelling/artillery/missile attack.

2022, when the Myanmar military forces carried out airstrikes using four Mi-35 Helicopters in a village in Yinmarbin Township in Sagaing Region.

As has been the case across contested areas of Myanmar since the attempted coup, there has been systematic targeting of civilian infrastructure and property destruction in the central Dry Zone. Examples from townships where the project was implemented include:

- On 12 April 2021, in Taungdwingyi Township, Magway Region, military troops entered three villages - Pat Lal Gyi, Pyin Chaung and Si Thar - and opened fire to intimidate locals. They also raided around 1,000 homes in the three villages, burning one to the ground, and

forcing more than 3,000 residents to flee.

- On 7 June 2021, in Zee Taw Sanpya village in Yesagyio Township, Magway Region, a fire broke out at the school in the village, following a pattern of arson attacks on educational facilities at the time.
- On 14 May 2022, in Chaung U village, Pale Township, Sagaing Region, the military set fire to the Basic Education Middle School.
- On 19 February 2023, in Nwe Inn village, Pale Township, Sagaing Region, the Myanmar military set fire to the shelters of internally displaced peoples (IDPs) and a rural health clinic.

A consequence of the conflict has been a humanitarian crisis, with millions of people having had to flee.

According to UN data, there are now almost four million IDPs in Myanmar, with Sagaing Region, where the project had distributed some 73,000 cookstoves, having the highest number, accounting for 35% of all of Myanmar's IDPs. Magway, where the project had distributed another 73,000 stoves, is the region with the third highest number of IDPs.

Alongside the refugee crisis, hunger has reached alarming levels in Myanmar, with the situation still worsening. According to the UN's World Food Programme (WFP), 15 million people were expected to face hunger in 2025. Those living in active conflict areas, particularly in Sagaing, are experiencing the highest levels of food insecurity in the country.

Top left: An IDP camp in Sagaing Region (Myanmar Policy Institute). Top right: Fires caused by a military junta air strike (MPATV/Wikimedia Commons). Bottom: A rifle held by a rebel soldier (Wotchit/Wikimedia Commons).



Another grim consequence of the attempted coup is the huge rise in brutal acts of conflict-related sexual violence, particularly in Sagaing and Magway Regions, as documented in a [report by Legal Action Worldwide](#).

These acts are predominantly being committed by military junta soldiers, military intelligence officers, and pro-military militias, as well as the notorious “Ogre Column” operating in Sagaing. According to the report:

- Conflict-related sexual violence, especially gang rape with extreme cruelty, is systematically used as a weapon of war in Myanmar, notably in Sagaing and Magway. These regions have seen a concerning rise in such violence, reflecting an expanding tactic of war and repression.

- Military checkpoints, particularly those controlled by the junta and pro-military militias, are hotspots for sexual abuse against women and girls—including assault, rape, verbal abuse, and intimidation. The Zalote checkpoint in Monywa City, one of the townships where the cookstoves project was implemented, has become especially notorious since 2022, instilling widespread fear.

- This pervasive threat has severely restricted the movement of women and girls, forcing them to avoid markets, schools, and clinics, deepening their economic dependence, and reinforcing patriarchal control. Families confine women for “protection,” creating a climate of fear and

silence around sexual and gender-based violence.

It is clear that since the attempted coup, the military junta has **systematically targeted civilians**, particularly in the central Dry Zone, leading to many thousands of deaths, millions of people forcibly displaced, rampant hunger, and horrific acts of sexual violence. Women and girls will have been disproportionately impacted through gender-based violence and food insecurity in particular. It is therefore ironic that CCC and its implementation partners would claim to be improving the lives of women and girls through the distribution of simple cookstoves, when so much harm is being done to all other aspects of their lives.

Selling carbon credits relies on exploiting women’s unpaid labour

There are clear parallels between the exploitation of women and girls through conflict-related gender-based violence and their exploitation for income-generation by carbon offsetting projects. Fundamentally, CCC’s Myanmar cookstoves project relies on women’s unpaid labour and time to generate carbon credits, and this is exploitative given that they do not receive a direct share of the financial benefits. The project treats women as unpaid beneficiaries rather than decision-makers, reinforcing existing patriarchal structures and unequal gender roles.



A woman carrying wood in Myanmar. [Soneva Foundation/Flickr](#)

On top of this, women are likely to lack the household decision-making authority to actually accept and use improved cookstoves, even though their gender roles mean that they are doing the work and, as a consequence, disproportionately suffer the health consequences of indoor air pollution, and face physical risks while gathering wood. This is reflected in the [responses to the oral survey](#) conducted as part of the project’s monitoring strategy: of the 231 households surveyed, 80% of the recorded household leader names are male.

Although the project claims to address gender injustices by reducing fuel wood consumption, and therefore reducing the burden of fuelwood collection and improving air quality due to the fact that less wood is being burned, it locks women into these domestic roles by making them more “efficient”, rather than challenging systemic inequalities. The improved stove efficiency that is the basis of this project should actually be seen as improving the efficiency of the women who use the stoves—without their labour, the stoves would not generate carbon credits.

Tweaking something fundamentally flawed: Methodological issues with cookstove projects

Improved biomass cookstoves have been **attracting development finance** for several decades and, more recently, climate finance. They also play a significant role in carbon offset markets, constituting **almost 8%** of all projects on the voluntary carbon market.

They aim to reduce the amount of wood burned for household cooking in the Global South, and, at the same time, to reduce household air pollution to protect the health of women and young children in particular—although it should be noted that the Myanmar cookstoves project does not monitor indoor air quality; it merely assumes a positive impact.

The problems which improved cookstoves projects seek to address are real and urgent. However, there is **very little evidence of successful** biomass cookstove projects which have reduced pollution levels to within safe levels, and estimates of fuel use reduction are often wildly overestimated due to incorrect assumptions and inadequate monitoring. In fact, **according to the UN's own publications**, most cook

stove distribution programs have failed in the past in Myanmar.

At the heart of improved cookstoves projects is a fundamental flaw in carbon accounting for biomass combustion, which lies in the inconsistent treatment of emissions. Industrially sourced “modern” biomass is deemed “renewable,” so its combustion emissions are ignored. In Europe, North America, Japan, and South Korea, energy companies burn millions of tonnes of wood, considered “carbon neutral” and generously subsidised as renewable energy. Meanwhile, fuelwood burned by households in Myanmar and elsewhere in the Global South is labeled “non-renewable biomass,” and its emissions are counted—enabling cookstove projects to claim emissions reductions and carbon credits.

This creates a situation where state-owned enterprise Korea Electric Power Corporation (KEPCO), running large-scale biomass co-firing facilities,⁴ offsets its emissions from other operations through purchasing Myanmar cookstove credits. Emissions from its biomass power plants are ignored and subsidised, even though there is **strong evidence** that wood pellets imported by South Korea and burned in power stations such as KEPCO's are strongly linked to the destruction of carbon and wildlife-rich forests. At the same time, household cooking emissions in Myanmar are counted. This double standard in carbon accounting exposes a significant climate injustice.

⁴ KEPCO subsidiaries operate biomass power plants with a combined installed capacity of 1.27 GW.

A woman using an improved cookstove in Myanmar. **Soneva Foundation/Flickr**



This briefing does not offer a comprehensive assessment of the methodological flaws⁵ in the way that emissions reductions are accounted for by the project, but causes for serious concern include:

- Analysis published by South Korean NGO Plan 1.5 with a research team at the University of Berkeley in the United States and Carbon Market Watch found that the CCC cookstove project in Myanmar was overcredited by 14 times, leading CCC to respond publicly to the analysis. More recent analysis by Carbon Market Watch shows that even with the supposedly more robust emissions calculations applied under the PACM, the project is still likely to be over-credited by a

factor of seven in its second monitoring period, for which credit issuance was recently approved.

- The project's monitoring reports (CPAs 1-6 and CPAs 7-54) for the second monitoring period show that minimal monitoring of stove use is undertaken, relying almost exclusively on a basic oral survey with a very small sample size of stove users. The stove users are asked to answer the yes/no question "is the stove still in use after two years", and estimate wood consumption themselves. Furthermore, the methodology applied allows project implementers to report with such high flexibility and low accuracy that much more favorable results are achieved on paper than in reality.

- Emissions reductions calculations are based on flawed assumptions, such as assuming that all distributed cookstoves replace old three-stone stoves entirely, and that households don't keep using old stoves alongside new ones. This key question isn't even part of the oral survey. The methodology also relies on the Water Boiling Test being carried out in laboratory conditions in order to calculate stove efficiency, which means that efficiency is not measured during actual use of the cookstove. The Clean Cookstove Alliance says that "In order to confirm desired impacts (whether it is fuel conservation, smoke reduction, or other impacts), stoves must be measured under real conditions of use."

⁵ The following CDM methodology has been applied to the project: AMS-IL.G Energy efficiency measures in thermal applications of non-renewable biomass, version 09.

Verification via video call: No on-site verification took place due to security concerns

Verification reports (CPAs 1-6 and CPAs 7-54) compiled by Indian certification company Earthood Services Private Limited for the second monitoring period describe how "political tension/security concerns in the host country" meant that mandatory site visits could not be conducted as part of the verification process. The verification team only traveled to the capital Yangon, and did not visit any of the project implementation sites at all. Instead, the process consisted of a total of 22 online video interviews with "stove users", only two of whom were women—a tiny sample size given that emissions calculations for the second monitoring period relied on the distribution of nearly a million stoves.

The verification team did not travel to Myanmar at all as part of the verification process for the first monitoring period under the CDM due to the COVID-19 pandemic, meaning that at no point was the project's implementation in the Dry Zone verified in person. The fact that site visits could not be undertaken due to security concerns seriously questions the likelihood that the project could have been implemented and monitored properly, and casts real doubt over the rigour of the verification process.



Conclusion: Root climate action in climate justice

Closer analysis of CCC's Myanmar cookstoves project reveals a deeply troubling intersection of market-based climate finance, governance failure, gender impacts and ongoing human rights abuses. At its core, the project illustrates the risks inherent in treating emissions reductions as commodities removed from their social and political context.

Despite being implemented in regions ravaged by conflict, displacement, and state-sponsored violence, the project was still granted the first-ever issuance of carbon credits under the Paris Agreement's Article 6.4 mechanism. This endorsement signals a profound disconnect between the lofty rhetoric of "high integrity" carbon markets and the complex, often devastating realities on the ground.

The project's operation in Myanmar's central Dry Zone—an area marked by systematic military violence, mass displacement, sexual and gender-based violence and the deliberate targeting of civilians—raises serious ethical and practical concerns. The fact that credits generated in such conditions are used to offset emissions by corporations and governments abroad, often with little to no acknowledgment of the political environment in which they were produced, undermines the credibility of the PACM and broader international climate action. It is particularly disturbing that the same authorities orchestrating violence against civilians are also ultimately responsible for implementing these so-called climate solutions, blurring the line between aid and complicity.

Methodologically, the project is beset by problems that have long plagued cookstove initiatives, including overestimation of emissions reductions, lack of robust monitoring and verification, gender exploitation and questionable assumptions about real-world stove usage. The persistent double standard in carbon accounting, whereby industrial biomass burning in the Global North is deemed "carbon neutral" while small-scale fuelwood use by women and girls in Myanmar is

penalised, exposes the deep inequities at the heart of the carbon market system. This not only facilitates greenwashing for major polluters but also perpetuates climate injustice, rewarding those least affected by climate change while shifting the burden onto the most vulnerable communities.

As global carbon markets expand under the Paris Agreement, the case of the Myanmar cookstoves project

should serve as a cautionary tale. Through projects such as these, carbon markets become tools to further violence and exploitation of vulnerable communities. True climate solutions cannot be market-based. Climate solutions must be led by communities, rooted in context, and hold all actors—governments, corporations, and intermediaries—accountable for their actions and impacts.

Recommendations

In light of the findings of this analysis, the authors of this briefing call on the PACM Supervisory Body to:

- Immediately suspend any further issuance, transfer, or use of credits associated with PoA 10471.
- Conduct an independent review of the project's compliance with all applicable methodological, environmental, and social requirements.
- Revoke all credits issued under PoA 10471 and disqualify it from future issuances under PACM if the review determines that the project has failed to meet PACM requirements and safeguards, or that issued credits do not represent genuine and verifiable emissions reductions.

