Title: Ethical carbon offsetting in the journey to a zero-carbon world

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Abstract

There is vigorous debate in the academic literature and in civil society on the role that carbon offsetting should play in mitigating climate change, including whether offsetting is used by organisations and individuals as a 'permit to pollute'. Here, interviews with carbon market stakeholders are used to explore this ethical criticism in a 'boutique' segment of the voluntary carbon market (VCM). The results suggest that buyers are sincere in seeking holistic carbon reduction strategies and are aware that offsetting is no substitute for emissions reductions, but rather a tool in the transition to a low-carbon world. Buyers were well-informed and committed to wider sustainability, yet it is recognised that this cannot be expected throughout the market and there is an onus on sellers of carbon credits to ensure ethical practice. Ethical practice in the VCM must be strengthened to protect against risks that come with an evolving

Introduction

Limiting global temperature rise to under 2°C, in line with the Paris Agreement, requires the virtual elimination of net anthropogenic carbon emissions by 2050 (Anderson, 2015). The Covid-19 crisis helps reveal the scale of this challenge. Global carbon emissions were 6.4% lower in 2020 than in 2019 (Tollefson, 2021). From 2025, reductions of around 10% per year are needed to meet the 2°C target; hence even a shock as profound as Covid-19 is unlikely to result in the necessary annual reductions.

What can individuals and businesses do to help in the essential transition to a net zero carbon world? Showing leadership by reducing their own emissions and advocating for systemic change is crucial, but until the economy is de-carbonised the conduct of daily life will still involve emissions. One response to this involves voluntary carbon offsetting, which is used by individuals and businesses to compensate, in whole or in part, for their carbon emissions. By purchasing carbon offsets, individuals or organisations can financially contribute to activities that commit to either removing CO₂ from the atmosphere, such as protecting or planting forests, or deliver projected emissions reductions, such as financing renewable energy initiatives, thereby compensating for emissions from activities such as driving, flying or manufacturing. The voluntary carbon market is distinct in size, character and regulation from the compliance carbon market. The latter applies to carbon-intensive industries required to partake in large scale programmes such as the EU Emissions Trading Scheme. Projects on the voluntary carbon market are typically smaller and include more nature-based solutions with a greater element of community engagement and additional co-benefits such as socioeconomic development or biodiversity gains. For this reason, voluntary carbon projects are generally more expensive to implement, per tonne of carbon sequestered, than compliance projects and demand a higher price for credits (Porras, Wells, Stephenson, and Kazis, 2016). The market traded over 42 Mt CO_{2eq}, worth \$282 M, in 2019 (Forest Trends Ecosystem Marketplace, 2020). Although this is only around 1% of the compliance market there has been strong recent growth and there is growing impetus to massively expand the market. For example, Mark Carney, the former Bank of England governor, recently launched a taskforce aiming to rapidly enlarge the market, perhaps by as much as 150 times (Foraise, 2020).

The policy landscape in which carbon offsetting lies is changing. Article 6 of the Paris Agreement, currently under negotiation, will dictate the rules for how countries can voluntarily cooperate through market and non-market approaches to achieve their emissions reductions commitments. One proposed framework, referred to as the 'Sustainable Development Mechanism', will replace the current Clean Development Mechanism (CDM). The CDM, the largest compliance market, has been widely criticised for failing to deliver claimed emissions reductions; Cames et al (2016) report that 73% of CDM credits are unlikely to be additional to what would have been achieved in the absence of carbon financing (i.e., they fail the 'additionality' test) and that total sequestration is likely to have been overestimated. There has been neglect of community engagement and misalignment with international human rights in some CDM projects (e.g., Schade and Obergassel, 2014). Article 6 will outline the rules for new carbon markets and legislate how they will operate alongside Nationally Determined Contributions (NDCs), the commitments that each signatory makes to reach the goals of the Paris Agreement. Regardless of the outcome of these discussions, a future voluntary carbon market must deliver carbon emissions that are additional to national-level efforts and emissions facilitated by the compliance market. It must ensure projects are based on robust science and are ethical, serving social as well as environmental goals, whilst effectively complementing national and international policy frameworks on climate and related policy such as biodiversity conservation.

Carbon offsetting has been criticised on the grounds of market failure, policy inaction and ethical hazards. Critics argue that the claims by project developers of additionality, nonleakage (meaning that projects do not simply displace problems, such as forest destruction, elsewhere) and permanence (meaning that carbon savings cannot be reversed over short time periods) cannot be proven and in some cases are unfounded (e.g., Thamo and Pannell, 2015). Others argue that the implied commodification of nature is inherently wrong or ineffective (e.g., Paton and Bryant, 2012) and that scientific uncertainties mean that unsubstantiated claims of emissions reductions are made (e.g., Dhanda and Hartman, 2011). Offsetting is also accused of distracting from bolder policy decisions, allowing emissions reductions to be delayed or avoided (e.g., Markusson, McLaren, and Tyfield, 2018). Monbiot (2006) goes as far as likening offsetting to the buying of indulgences in the Medieval Catholic Church, implying that offsetting is both corrupt and actively damaging in how it assuages guilt about pollution, allowing unsustainable (mostly Western) lifestyles to perpetuate. For these critics, corporate offsetting is seen as a form of greenwashing. These criticisms are debated in published literature (e.g., Hyams and Fawcett, 2013) and are countered by practitioners of carbon trading projects (e.g., Porras et al., 2016; Huxham and Sumner 2019). As the policy landscape of carbon offsets evolves with Article 6 negotiations, these criticisms must be addressed by policymakers, carbon standards and project developers to ensure that future carbon markets are scientifically and ethically robust, ensuring real and long-term emissions reductions that are achieved through socially-just projects and interventions. There is also an onus on the carbon buyer not only to select ethically robust projects with which to offset, but also to use offsetting responsibly, as part of an integrated strategy of carbon reductions, to ensure that offsets are not used to justify perpetuating high-carbon activities and lifestyles.

Carbon offsetting, together with other carbon-reduction strategies, offers opportunities for companies to gain competitive advantage as well as to support sustainability initiatives (Tolhurst and Embaye, 2012). Good Corporate Social Responsibility (CSR) projects can

enhance reputation and employee engagement although critics argue that much CSR is predominantly cosmetic (Phillips, 2006). CSR, alongside broader ethical reasons, have been cited as primary motivations for organisations to purchase carbon offsets (Ecosystem Marketplace and Bloomberg New Energy Finance, 2011). To safeguard against the risks of superficiality or insincerity, carbon offsetting as part of a CSR strategy must be used in a way that is socially and environmentally ethical and robust.

Here we investigate arguments against offsetting, in particular that it presents a 'moral hazard' - the charge that offsetting allows individuals and organisations to assuage guilt without reducing their carbon emissions and that corporations use offsetting as a cheaper alternative to reductions. Using interviews with individual and corporate buyers of carbon credits, carbon credit resellers and project developers, we explore stakeholder perspectives on the role of carbon offsetting alongside wider emissions reduction strategies. We bring particular focus on the stated reasons for offsetting and the implied sincerity of choosing offsetting as one response to the climate emergency. We consider factors that influence the selection of offsetting projects, the risks and benefits of offsetting, and the roles of carbon standards and project developers in ensuring ethical practice in carbon trading. The current literature on the use of carbon offsetting by business largely focuses on the travel and aviation industries (e.g., Zeppel and Beaumont, 2012; Lu and Wang, 2018), and the conceptual debate surrounding the moral hazard of offsetting is frequently framed in the context of allowing consumers to continue to take flights rather than reducing air miles. Aviation is perhaps the main activity for which voluntary carbon credits are bought; flights are discrete events with a discernible carbon footprint, and many 'carbon calculators' primarily or solely estimate the emissions from flights, as opposed to other activities or lifestyle choices such as diet, manufacturing or road travel. Here, we interview stakeholders from a range of sectors and industries, including but not limited to travel, in recognition that offsetting can be and is used to compensate for emissions from many activities in addition to air travel. This study aims to identify best practice by

consumers, providers and regulators within the voluntary carbon market and to suggest how the voluntary carbon market might most usefully respond to the new challenges and opportunities raised by Article 6 of the Paris Agreement.

Methods

Literature Review

A review of peer-reviewed and grey literature containing criticisms of the carbon market was conducted. This included literature on the voluntary market specifically, and of carbon markets in general. Criticisms were categorised and each argument summarised. The purpose of the review was not to produce a comprehensive collection of literature but rather to read and summarise all key criticisms; as such it was conducted until saturation in the list of (often overlapping) criticisms was achieved.

Interviews

Semi-structured interviews were conducted with stakeholders in the voluntary carbon market drawn from the following categories: project developers (n=3), individual carbon buyers (n=6), institutional (business, charitable organisations, universities and public sector) carbon buyers (n=5) (hereafter referred to as 'corporate buyers' with recognition of the diversity of organisations represented) and resellers of carbon credits (n=2).

Participant selection

Participants were invited by email to take part in a semi-structured interview exploring the motivations of buyers of carbon credits on the voluntary carbon market and how carbon offsetting can complement or hinder other strategies to address climate change. Carbon

buyers (individual or corporate) were selected by contacting buyers of carbon credits from the Mikoko Pamoja blue carbon project (Plan Vivo, 2020) in the last three years. The trading body for Mikoko Pamoja restricts sales of credits by scoring against ethical criteria; credits are not sold to highly-polluting organisations or buyers who do not take action to reduce their carbon footprint prior to offsetting (ACES, 2020). Project developers were selected by contacting the current certified blue carbon projects on the voluntary carbon market as well as uncertified projects that leverage donations based on a carbon benefit from the conservation of seagrass, mangrove and/or saltmarsh habitats (the so called 'blue carbon' habitats). If no response was received, invited participants were sent a follow-up email after two weeks. Of those contacted, 3/7 developers, 10/13 buyers and 2/3 resellers agreed to take part in an interview. Of the corporate buyers, 2 represented a business, 1 represented a charitable organisation, 1 represented a university and 1 represented a public body.

Data collection

Interviews (of 30-45 minutes duration) were conducted by video call and followed a semi-structured approach. A set of questions (provided in Appendix A) were developed between the three authors and were used to guide interviews, although follow-up questions were asked where appropriate to explore individual views. These questions were tailored to each stakeholder group. Interviews were recorded and fully transcribed using Otter (https://otter.ai/) and manual transcription. Data were anonymised following the interviews. Ethical clearance for this research was provided by the Edinburgh Napier University research ethics committee.

Data analysis

Interview transcripts were analysed using a manual thematic approach to identify emergent themes within the stakeholder groups of individual buyers, corporate buyers, resellers and project developers of carbon offsetting. Interview transcripts were analysed independently by three members of the research team. Themes identified by the three research team members were then compared to one another to identify shared and emergent themes; a double-blind approach to analysis was applied to prevent bias and ensure confidence in the final thematic codes identified, with subsequent rounds of discussion, comparison and further refinement of themes that characterised the data as a whole (Braun and Clarke 2006). The agreed list of themes is presented below, and emergent issues discussed.

Results and discussion

Literature review

Criticisms of the carbon market, summarised and categorised, are shown in Table 1. Examples of references for these are provided; these are not exhaustive but give key sources. The arguments presented are categorised as being of primary relevance to the current study (shaded dark grey), meaning they are directly addressed by the research questions; of secondary relevance (shaded light grey), meaning they are discussed to a lesser degree in the context of our findings but are not comprehensively addressed; and of little to no relevance (unshaded/white), meaning that the arguments hold little to no relevance to the current study and are not addressed here.

Category	Argument	Description	Prediction/implication	Example source(s)
Moral hazard	Individual moral licence	Individuals buy offsets to assuage guilt and this permits them to continue with high emission lifestyles and/or to ignore political action i.e., prevents individual change and activism	Individual buyers of carbon offsets are less likely than others to engage in activism for a zero-carbon economy and more likely than others to persist with high emissions lifestyles	Monbiot (2006); Jaccard (2020)
	Corporate greenwash	Corporations that buy offsets do so in the knowledge that they are cheaper and/or less effective than cutting emissions in order to avoid changing behaviour	Corporations that buy offsets will use them prominently for public image and will not commit to zero carbon plans that involve emissions reductions	Greenpeace (2020)
Neo-	Commod - ification	By turning carbon into a commodity, offsetting projects imply there are no other arguments for conserving nature or act to undermine these other arguments	Carbon trading will undermine respect for natural areas and reduce perceptions of intrinsic value	Sandel (2012) p77
liberalism	Enabling Capitalist expansion	Environmental market instruments, such as PES, help foster the growth of capitalism, which is fundamentally antithetical to sustainability	Genuine sustainability cannot be achieved within a capitalist world economy and increasing use of market instruments will accelerate environmental crisis	Büscher and Fletcher (2020)
Neo- colonialism	Expropriation	Offsetting using nature-based solutions is a form of exploitation in which rich outsiders gain financially from the	Local people will resist offsetting projects and benefits from the projects will go largely to outsiders	Bachram (2004)

		resources owned or managed by local people in developing countries		
Market failure	Fraud	Offsetting project developers, accreditors and validators all have financial (and other?) interests in corroborating offset projects and there is an asymmetrical distribution of knowledge, since buyers cannot know what developers know	Offset projects should rarely fail accreditation and validation. Independent analyses should find evidence of fraud	Jaccard (2020); Dhanda and Hartman (2011)
	Scientific uncertainties	Some offsets, particularly involving Nature Based Solutions (NbS), involve assumptions about rates of sequestration and storage that are scientifically uncertain	There will be attempts to hide uncertainty and simplify science	Popkin (2019)
Known uncertainties in	Additionality	Offset projects would have proceeded anyway, with different sources of funding	Projects that use offsets as funding are similar to a suite of other similar projects in the same countries/locations that do not. There are few examples of innovative and unusual offsetting projects.	Cames et al (2016)
accreditation	Permanence	NbS especially involving forestry, do not achieve permanent sequestration and any achievements can be reversed by future events such as fires or droughts	All types of mitigation involving NbS, whether using offsets or not, are flawed; no efforts should be expended on them if this detracts from focus on emissions	Fern (2017)
	Leakage	Offset projects simply displace emissions elsewhere	In forestry this results in higher rates of cutting outside protected/project areas than before projects. In other sectors e.g., energy total emissions in the sector do not fall	Fern (2017)

Policy making in	Carbon price deflation	Offsetting allows the carbon price to remain lower than it would otherwise in cap-and-trade policy settings hence slowing real change	Large players in compliance markets push for offsetting and markets with offsetting have lower carbon price than those without	Jaccard, quoted in Fairley (2016)
bad faith	Policy procrastination	At national and international policy levels, offsetting is used as an argument to delay and avoid emission reductions	Countries with the largest emissions and those most influenced by fossil fuel interests will push hardest for offsetting in international agreements	Markusson et al (2018); Murphy (2020)

Themes identified in stakeholder interviews

The main emergent themes identified are listed below, according to the stakeholder groups.

Individual buyers

Buyers discussed using **offsetting as part of action for wider sustainability.** Among the individual buyers interviewed, offsetting was used in addition to (and in most cases, after) reductions or other actions to live a more sustainable lifestyle, such as driving electric vehicles, switching to electric heating systems or eating a plant-based diet:

"I think one has got to look at it as a transitional action, one's got to become much more energy efficient and basically the problem is that we're continuing to add carbon to the atmosphere. We are reducing the amount of carbon we're putting in still, but it's still already too much. And that's going to be hanging around for 100 years or so. So we've got to look beyond going to net zero, we've got to go to negative carbon, we've got to draw down. So, when you put carbon offsetting into that context, it's just a pebble in the ocean. There's got to be huge cultural changes and technological changes, to really get us back to... pre industrialization levels." [Individual buyer 2]

Participants also discussed feelings of guilt over previous and ongoing emissions, and the moral dilemma that they are unable to eliminate emissions from their lifestyle. They discussed the need to make trade-offs between making reductions and the costs and/or feasibility of steps or actions required to reduce emissions, and of the moral dilemmas in where and when these trade-offs should be made:

"I suppose the one word is guilt, really. When you get to my age, I'm 78, you look back at one's life and you see all the carbon dioxide you've produced. And you [feel] pretty guilty about it. We have sinned previously really, in putting all this carbon dioxide out. So, there is some way in which we can compensate. And then I think we have a moral obligation to [offset] really. But really, our contribution is so small. It's the big corporate organizations. They're the big, big polluters, you know. They ought to be doing far, far more, which is absolutely true, but, but I don't think that absolves the individual from doing something. Having said that we're all somewhat hypocritical really, including myself, because we don't do as much as we can. I mean, where do you stop?... We could look at all the aspects of our lives, the food we consume, the products we buy, and so on. And really, we should be offsetting a lot of that too... morality is on a sliding scale." [Individual buyer 3]

When selecting projects from which to buy offsets, participants discussed the importance of trust in the accreditation, reputation and scientific credentials of projects and the organisations and individuals involved in developing and operating the projects. These factors reassured buyers that the projects can be trusted to fulfil environmental and social commitments and were particularly important for buyers who did not feel qualified to conduct due diligence of projects themselves:

"[Accreditation] gives some sort of independent assurance. It goes beyond the claims because lots of charities or foundations could claim they're doing it." [Individual buyer 4]

"It matters to me having some kind of third-party confirmation that what they say is

In addition to trust in projects, a **personal connection** with projects emerged as an important factor when purchasing offsets. Participants felt a connection to projects through previous visits to project sites, geographic connection (for example, projects located in the buyer's home country), personal interest in the ecosystem(s) within the project or other co-benefits such as community development, and professional experience:

"I suppose It was important to [carbon offset] in a way that is beneficial to communities... As a professional I previously [worked in] Myanmar. And the mangrove swamps there [were] really significant during the huge cyclone Nargis that hit... and that the areas of coastline that were most protected were the mangrove ones.... My very superficial research tells me it's extremely efficient and absorbs a lot of carbon, much more efficient, and I think the alternatives... And it is exceptionally important to coastline communities and to protecting inland communities from the coastline." [Individual buyer 4]

Corporate buyers

Corporate buyers of carbon credits who participated in the research conducted **due diligence**of projects that they bought carbon offsets from and the standards by which they are
accredited. In some cases, participants felt a particular need to conduct this due diligence due
to an awareness of public criticisms of offsetting as a sustainability tool and of the credibility
(or lack thereof) of projects discussed in public literature:

"We looked at projects that were accredited with [carbon standard] for emissions reduction projects, and then the [carbon standard] for sequestration projects... And then we put that to a survey to staff because we want staff to weigh in on this and we want to buy offsets, that means something to our business. So, we've provided an option, we've done a one-page write up on each project, we've thoroughly reviewed all the documentation. And we've used Google satellite images to show where these projects are, here are the windmills and so on. So, people really know [that] these are real projects, here's where they are, here's how many people or communities they're supporting." [Corporate buyer 3]

Participants discussed **the value of accreditation** in the due diligence process; this was important not only for peace of mind but for corporate reasons including the ability to claim credible carbon reductions:

"[Lack of certification] would definitely put me off. Because there are so many projects around the world... if we don't know for sure that it is well carried out, well followed up and preferably long term, then yeah, it's like throwing the money out of the window not knowing who is going to pick it. So, it's also about justification. If people ask you what why did you choose that project? I can say, well, it's certified [and] there is a body that is going to check whether everything that is done is according to the rules." [Corporate buyer 3]

Participants also discussed their **ambitions in offsetting and for wider sustainability.** Some participants discussed going beyond the minimum when buying offsets, including offsetting more CO₂ than they emit and paying more for high-quality projects:

"This was about practicing what we preach and ensuring that we do the best that we can... this isn't something that we have to do, so maybe going a bit further and of course this isn't waving the magic wand and the emissions disappear the moment you offset them. It certainly doesn't let us off the hook, so we do see this as acknowledging our emissions rather than magically making them disappear. And we do our carbon footprint to see how we're performing; we get this number at the end which we offset but that's not the main purpose of this exercise. We consider it as the last resort when we can't effectively reduce our emissions." [Corporate buyer 5]

Seeking an **alignment with the vision and values of the company** was reported by most participants to influence their choice of offsetting project. For example, businesses that had a connection to the ocean discussed favouring 'blue carbon' credits, while businesses with a strong community focus identified community development co-benefits as a key project characteristic that they looked for in offsets:

"One of our main pillars in sustainability is [to] work together with local communities in everything we do [which is] why we decided to work together with [project] because we want to collaborate with partners that are in the same country as most of our trips are organised... we want to have local partners... and ideally community-run community based because it affects both of our pillars [of] sustainable community development and compensating our carbon." [Corporate buyer 2]

Resellers

Resellers of carbon credits discussed their clients using carbon offsets as a secondary component of sustainability. When developing clients' sustainability strategies, carbon

offsets are applied late in the process to address emissions that cannot be reduced. Resellers explained that clients are not encouraged to, and often do not want to, offset and instead favour reductions or 'insetting' (financing activities or interventions within their own processes that deliver carbon reductions):

"I think of [offsetting] as one component. I think that reductions just need to be at the heart of everything that we do. That's obviously much more difficult, but I think that we have to cut our reliance on fossil fuels, and we have to reduce our impact and then the offsetting component is that last push to bring about neutrality if you can. But I think it's really, really important but it's only one component and to me, probably a smaller component next to actually reducing our emissions." [Reseller 2]

The themes of due diligence in projects, the value of accreditation, ambition in offsetting and wider sustainability, and alignment with the vision and values of the company, all discussed by corporate buyers, were also identified as themes within reseller interviews. This was the case for both the reseller's own opinions and the opinions that they observe among clients; for example, resellers valued credible certification and reported that this was often a factor in clients' decisions-making when selecting a project from which to purchase offsets.

Project developers

Project developers who participated in the research were mostly (and in the case of developers of certified projects, all) **discerning of offset buyers.** The project developers who applied criteria to who can purchase their carbon offsets discussed refusing sales of offsets to clients who do not first reduce their carbon footprint, and/or to high-polluting industries such as oil and gas:

"We really try and find organizations or brokers that share our values... that we really believe in, and we kind of like hold very close to our hearts, so trying to find organizations that align with those values... We have sold to brokers, but I think going forward, we're going to try and find organizations to sell to ourselves, so we've just got a better idea of where those credits are actually ending up because we're trying to only sell to companies which are using that these offsets... to offset their unavoidable emissions... that have other strategies to bring down their company's emissions more generally, and then for this set of unavoidable emissions they're using offset." [Project developer 2]

Project developers also discussed the uncertainty of the future of the voluntary carbon market. Project developers described the effects of current and projected instability in the carbon market caused by changes in politics, finance and public perceptions:

"I think the uncertainties... regarding how voluntary offset projects fit into a country's and NDCs and national accounting, there's a lot of uncertainty around that... The CDM never lived up to the expectations and everything like that, you know, and I do think there is a potential for a real global compliance market in the future which may or may not make the voluntary market redundant. But in the interim, there's... a real opportunity for voluntary offsets. But the uncertainty is what's killing it. If we wanted to do a [large] project that would be a big investment and a big commitment and for those bigger projects you really need investors to help you do it, you need that investment commitment in order to be able to go ahead and one thing that investors hate is uncertainty and the slow speed at which the Paris Agreement is moving forward and materializing, and now with COVID over everything." [Project developer 2]

Project developers also discussed **alternatives to carbon** as a source for funding conservation. Project developers are aware of the value of ecosystem services other than carbon (such as coastal protection and fisheries enhancement) and hope to explore or are exploring how these can be incorporated into project design and funding. Participants discussed how the current major focus on carbon in Payments for Ecosystem Services (PES) markets is not beneficial and can be a risk to projects:

"This kind of myopic focus on carbon, if you will, I think it's detrimental to an extent on the larger conversation and then financing. [Blue carbon ecosystems] wave attenuation property properties... from an actual measurable perspective, you know, how much are these systems actually protecting us and can we assign a value to that? Yeah. And I think from a PES perspective [it's best] to move beyond carbon. I really would like to see us move more in the direction of the resilience credits that are being developed right now... really trying to think about what are some of the other benefits, and can we add additional value." [Project developer 1]

Carbon standards

Carbon standard representatives discussed the **transitional role of carbon** in funding naturebased solutions to climate change. They suggested that carbon trading may not, or even should not, exist in the medium to distant future; however, for now, it serves a purpose:

"I see [carbon offsetting] as a shorter-term solution – something that in 10 or 15 years
I hope we don't have carbon offsetting because I hope we've moved on past that. Right
now, it's something that can help get financing to projects on the ground, at this
moment, that need financing to make a climate impact. So that's how we see it at this
stage, it's obviously not the full answer to addressing climate change because

ultimately it is allowing people to offset emissions rather than fully reduce their emissions, but it is helping to finance activities that otherwise wouldn't be able to occur and need to occur now because of the trajectory that we're on toward global warming."

[Carbon standard 1]

Although carbon offsetting was seen as a transitional mechanism, participants from carbon standards discussed the **challenges of diverging from carbon** under PES frameworks. Although pathways exist for accreditation against non-carbon ecosystem services, these are rarely used by projects due to technical and market challenges:

"The main reason we have this focus on carbon crediting is it's the easiest way to accredit a project right now, there's an existing carbon market, it's a very quantifiable unit of [carbon dioxide] that is fundable across different project types and areas, so it's just easier to do a carbon project and have this carbon credit and then there are these other benefits that are equally important, or in cases more important, but they're just automatically associated with this very quantifiable unit." [Carbon standard 1]

"I think that [lack of methodologies for ecosystem service beyond carbon] puts people off a lot. If you had methodologies in place for water quality or whatnot, I imagine you're going to be more likely to get projects to come in because it's less of a hurdle to make that happen.... I think [the market] is just incredibly carbon centric right now." [Carbon standard 1]

Participants from carbon standards also discussed the **policy sensitivity of carbon trading**, demonstrating an awareness of the current policy context and horizons and the (potential) implications of new developments for the voluntary carbon market:

"Another big challenge that we've identified is that there is a lot of uncertainty around how blue carbon activities will be included in NDCs or national accounting, and that's making it difficult for projects to be developed now. Broadly for forestry projects, they're going to be required to align with national accounting of projected deforestation rates, and the idea is that certain types of wetlands may be included in that in certain cases, but it's unclear when wetlands will be included or when mangroves are included, because they are considered forests. But other types of blue carbon ecosystems like seagrass aren't included there [there's] this uncertainty over whether blue carbon activities will be within or outside of national accounting, and that has impacts on whether there is a potential for double-counting between the voluntary project and national accounting. So, because of the uncertainty, it's making it difficult for projects to be developed right now." [Carbon standard 2]

Synthesis, analysis and implications of themes

Here we outline the key messages revealed by our themes and consider some of their implications for arguments around offsetting in the voluntary market.

Sincerity of buyers

The 'moral hazard' argument against offsets is summarised by Sandel (2012, p77) as the danger 'that those who buy them will consider themselves absolved of any further responsibility for climate change...carbon offsets will become... a painless mechanism to buy our way out of the more fundamental changes... required'. There was no support for that argument here; individual and corporate buyers of carbon credits described a wide range of

actions they were taking to achieve holistic carbon reductions. Sandel's use of 'absolved' implies that guilt is one motivation for offsetting and that was certainly reflected in comments from our interviewees:

"I could choose not to [fly to visit family] but that would have quite a big impact on my relationships with people. So, I choose to make that indulgence of flying around the world. But I want to be able to offset that. Otherwise, I'm deeply hypocritical." [Individual buyer 1]

Whilst guilt at emissions was a motivation, buying offsets was not 'painless' for our interviewees, neither by removing the need for other material changes nor by removing the difficult emotions experienced when grappling with this issue. Whilst critics often allege hypocrisy against those who purchase offsets, the quote above illustrates how most of our respondents would see ignoring offsetting as a greater hypocrisy, and how people and organisations are wrestling with genuine ethical trade-offs felt by climate-conscious individuals trying to do their best in a globalised world. Context is key here; the interviewee in question referred to an annual international flight taken to their home country, arguably an essential trip without which relationships - and the health, happiness and quality of life implications that come with them - would suffer. The 'permit to pollute' argument is frequently framed in the context of superfluous flights taken by frequent fliers. This example of an 'ethical trade-off', in which serious consideration is given to the balance between the positive and negative impact of emissions-generating choices, was also voiced by other interviewees, several of whom expressed appreciation that offsetting was an option to mitigate the emissions of a flight, or other activity, that was deemed genuinely necessary to the individual or organisation involved.

A sincere commitment to sustainability was also expressed by corporate buyers of carbon

credits. Corporate buyers discussed a range of commitments that showed sincere engagement with sustainability. These included reducing operational carbon emissions, more sustainable work practices such as plastics reduction and buying a greater number of offsets than were needed to compensate for their own emissions. A willingness to pay a higher price for high quality offsets was also expressed by several individual and corporate buyers. One corporate buyer said:

"We're buying twice as many offsets as we need and also... we're not picking offsets based on price, all of... the offset projects we identified are well above the average price." [Corporate buyer 3]

These statements of commitment towards sustainability should be scrutinised; 'greenwashing' is always possible. However, interviewees gave evidence of a range of commitments that suggest sincerity. In many cases, action was taken by buyers to conduct due diligence of projects (see 'Buyers need guidance' below) to assess the project's merits and fit with the organisation's or individual's values and principles. For example, one corporate buyer discussed that their organisation did not see sequestration (as opposed to emissions avoidance) offsetting projects as appropriate to utilise to offset ongoing emissions; these projects, the organisation believed, should be implemented regardless of ongoing emissions mitigation programmes to compensate for 'legacy' carbon already released. This organisation therefore doubled its offsets purchased; half in emissions-avoidance offsetting projects (to compensate for ongoing emissions) and half in sequestration (to fund environmental restoration and partially compensate for legacy carbon).

Buyers also emphasised the importance of trust in and personal connections with projects and project developers when choosing offsets, suggesting a genuine commitment to supporting

high-quality projects rather than a 'quick fix' of a cheap offset. Most participants felt that despite the actions they were already taking towards sustainability, more could and should be done by themselves and wider society if the climate crisis is to be addressed; offsetting was not viewed by these participants as an excuse to delay further action, but rather one component of a transition towards a low-carbon world. Hence our findings support the results of previous research focused on larger corporations that found businesses that invest in offsets are those most likely to engage in serious carbon reductions in their own operations (Tucker, 2019). Rather than acting as a signifier of greenwash, this work and our own suggests that buying offsets is a marker of sincerity.

A preference for projects that aligned with the buyer's personal and professional experiences and values emerged as a theme among individual and corporate buyers; this was expressed alongside a view of carbon offsetting having a dual purpose of emissions mitigation and supporting worthwhile causes such as biodiversity conservation and socio-economic development. In some cases, this 'additional benefit' was a more influential factor in the purchase of credits than the offset value itself; one corporate buyer, who had expressed a discomfort with offsetting but used it as part of a transitional model towards zero carbon emissions, said:

"It's not really about net zero for us... it's about supporting good projects." [Corporate buyer 3]

Others expressed guilt over 'legacy' emissions - over the individual or organisation's lifespan or beyond - and felt an obligation to sequester these emissions and support those most affected by climate change. One individual buyer said:

"We all have been part of the problem and are implicated, whether we like it or not, and all the NGOs and government agencies, environment agencies to have made and continue to make, with the best will in the world, mistakes, and get it wrong and see and with hindsight can see how it would have been better done things differently. It's not easy... there's no time [and] we have to learn so fast and really get things right this

Hence our findings do not support the predictions of the 'moral hazard' argument, either in its individual or corporate versions. Participants did not feel 'absolved' or seek cheap fixes. Rather they wrestled will trade-offs, sought out projects they felt they could trust (which were often more expensive), chose to buy more credits than needed and to consider legacy carbon and discussed a wide range of other actions in addition to offsetting.

Businesses need guidance

time." [Individual buyer 2]

Individual and corporate buyers within the study were generally well-informed about projects and conducted due diligence; in some cases, the certification was taken as a sufficient sign of quality assurance, although other buyers went above and beyond this to appraise projects themselves. Buyers (both corporate and individual) and resellers of carbon credits expressed a demand for high-quality offsets that deliver co-benefits beyond carbon. Several participants stated that price was no factor, or a lesser factor, in selecting a project and that a high-quality and trustworthy project was of far greater importance. One corporate buyer said:

"We're not picking offsets based on price... all of the offset projects we identified are well above the average price. We're not interested in buying cheap offsets. And

actually, I'd be happy to buy the more expensive credible offsets because it's just too cheap. It needs to be more expensive. We're tentatively having talks about whether or not we need like a minimum offset price in the public sector to bolster some of these quality projects that are more expensive." [Corporate buyer 2]

This preference for high-quality offsets was in cases accompanied by expressions of difficulty in assessing projects' credentials. Some participants used carbon standard accreditation as an indicator of quality, although many conducted due diligence at a project level in addition to this and expressed an inclination to learn more about, and assess, the projects themselves. This additional due diligence not only adds confidence to quality assurance, but may serve to enhance buyer engagement in environmental practices beyond offsetting, as expressed by participants including an individual buyer:

"Being interested in offsetting has opened up lots of new connections and networks for me in terms of local environmental initiatives." [Individual buyer 1]

The results suggest a desire among voluntary carbon buyers to engage with the projects that they support, beyond simply claiming the carbon offset. There is therefore an onus on project developers and carbon standards to make project information accessible to buyers to facilitate this engagement. This could increase consumer knowledge of the offsetting process and market and encourage more mainstream engagement with carbon markets by the general public and businesses. Third-party, independent guidance on the assessment of projects and standards may benefit consumer due diligence of projects and carbon standards. One individual buyer expressed trust in the endorsement of well-known and respected institutions; third-sector organisations independent from the carbon market may therefore play a role in

supporting due diligence conducted by individuals, businesses and other organisations. An individual buyer said:

"A lot of my charitable giving, I do through the [tax-free government scheme] ... and because a lot of these carbon offsetting schemes, because they're out of the country, they aren't on those schemes. But I understand why they're not. So, it is a little bit of a quandary. I would be more likely, if somebody like WWF, a big legitimate organisation, put their stamp on it, I would probably be more prepared to support it." [Individual buyer 6]

market actors, to provide guidance and due diligence on carbon offsetting projects; a recent example is the 'Oxford Principles for Net Zero Aligned Carbon Offsetting' (Allen et al, 2020).

The voluntary carbon market has been criticised in the past for its lack of central (national or international) regulation in comparison to the compliance market (Dhanda and Hartman, 2011). However, the numerous examples of strongly-criticised Clean Development Mechanism projects suggests that central regulation is not a guarantee of quality assurance in the voluntary carbon market; indeed, one of the strengths of the market is the range of projects it can support, with different sectors, locations and forms of governance. The absence of a single regulatory authority in the VCM does not mean there is no regulatory scrutiny. Projects accredited by one of the VCM standards (such as Plan Vivo or the Verified Carbon Standard) must undergo rigorous inspection and auditing, during establishment and running. Projects also need to report to the charity regulator (for those bodies operating as charities), to governmental stakeholders and undergo public scrutiny from civil society and academia; this scrutiny and governance is not always recognised or acknowledged in criticisms of offsetting. Dhanda and Hartman (2011) refer to a lack of technical literacy on the part of carbon

There may therefore be an opportunity for third-sector organisations, independent of carbon

offset buyers which makes it difficult for them to assess projects. There is therefore an opportunity and also a need for guidance on ethical practice in using offsets as part of wider carbon reduction strategies.

Onus on sellers to ensure ethical practices

Carbon offsetting is complex and poorly understood. Carbon projects and standards have a collective interest in helping buyers navigate the market and understand what offsetting can and cannot achieve for sustainability. This should include helping to educate and guide buyers towards sustainability and exercising discretion in making sales; cynical greenwashing by buyers would threaten systemic reputational damage for all stakeholders in the VCM. For example, the Environmental Defense Fund (2020) organised a stakeholder consultation that included a range of project developers and project standards and produced recommendations on how the sector can work collectively to ensure ethical practices, increased ambition and synergy with international policy.

Much of the discussion on the ethics of offsetting focuses on consumer behaviour (i.e., whether or not consumers of carbon credits use offsets alongside emissions reductions) and the implication of this for the future of the carbon market. Less has considered the role that sellers of carbon credits, and carbon standards, can play in ensuring ethical practice. Two of the three project developers (both accredited to carbon standards) interviewed here stated that they apply eligibility criteria to buyers when accepting sales, avoiding or restricting sales to organisations with high emissions and no demonstration of carbon reductions prior to using offsets. Many resellers of credits act in a similar way, working to assess, reduce and mitigate organisations' emissions as well as providing offsets. One 'carbon standard' participant also saw a role for standards in ensuring that the sale of offsets influences the behaviour of buyers to reduce their emissions.

Arguments beyond moral hazard

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Of the criticisms listed in table 1, moral hazard (in both individual and corporate forms) is the most relevant to the current work and we refute it for the sample considered here. Other arguments are less relevant or harder to assess. The dangers of fraudulent trading (market failure) and difficulties arising from scientific uncertainties around the scale and permanence of carbon sequestration are acknowledged in the emphasis given by buyers on the need for trust and credibility, which is closely associated with third party accreditation. The concern about neo-colonialism, or the expropriation of resources used by people in the global south by powerful outsiders, is largely irrelevant for smaller scale voluntary market projects, which must work with the owners and users of the resources and show local benefit in order to achieve accreditation. Critiques of commodification of nature apply beyond carbon offsetting; they raise fundamental issues of values and politics mostly beyond the scope of this paper. However, we note how all our interviewees emphasised the co-benefits - to people and nature - of the offsetting projects they supported and there was no evidence here that a multidimensional conception of values had been flattened into a single metric of price. Instead, people can balance and maintain values that are different and sometimes incommensurable. The final set of arguments labelled 'policy making in bad faith' in Table 1, are vitally important at an international scale. They apply mostly to the compliance market or to very large-scale corporate offsetting, although the voluntary market may help set norms and expectations that influence broader policy (and is certainly in turn influenced by this wider context). The project developers, standards and resellers (along with some larger corporate buyers) interviewed here understood the importance of this broader context, although have limited influence on it. A crucial opportunity to help shape this will come in the negotiations over article 6 of the Paris agreement, which need to ensure large scale, compliance offsetting is not used to undermine emissions reductions policies.

Article 6: policy context for offsetting

New market mechanisms under Article 6 of the Paris Agreement, currently under negotiation, will supersede the carbon trading mechanisms of the Kyoto Protocol. Although the voluntary market operates independently of the compliance markets established and regulated under Kyoto the outcome of these negotiations is likely to impact the way that the voluntary carbon market will be able to operate.

The Clean Development Mechanism (established under Kyoto) has been plagued by accusations of ineffectiveness (e.g., Cames et al, 2016) and malpractice (e.g., Schade and Obergassel, 2014), particularly in relation to human rights. It is widely recognised that Article 6 must improve upon the CDM; however, the details of how this will be done are proving controversial. With nations such as Brazil and Australia campaigning for projects and credits to be carried over from the CDM, there is a risk of weakening new mechanisms and repeating past mistakes.

While the voluntary market is not governed by Article 6, it is implicitly linked to the compliance market as Article 6 mechanisms will set out how governments can claim and trade carbon alongside (and potentially within) the scope of their Nationally Determined Contributions (NDCs) - the national-level commitments to reaching their emissions reductions to limit global warming to 2 degrees or less. It is not clear how or if credits traded on the VCM will be linked to NDCs and what mechanisms will be in place to avoid 'double counting' in which internationally traded credits are 'claimed' by more than one party. Whilst expansion of the carbon market under Article 6 may bring opportunities for the voluntary market, it might also threaten the removal of autonomy and local control and the loss of flexibility and innovation. Even without formal links between them, developments in the compliance market will affect the voluntary market since distinctions between them are not widely understood by the public. The most cogent criticisms of carbon offsetting, such as policy making in bad faith (Table 1), apply solely or predominately to the compliance market, yet failings here threaten to taint voluntary market activities by association.

This reputational risk is already evident under the CDM; it could become worse if Article 6 does not enact sufficient improvements to the compliance market. It is therefore imperative that robust protocols and safeguards are embedded into Article 6; if these do not materialise, the voluntary carbon market must act to distinguish itself to avoid further reputational damage. The results presented here present guidance to carbon project developers and standards in ensuring ethical practice in carbon trading and give an insight into the decision-making taken by carbon credit buyers in a 'boutique' segment of the voluntary carbon market defined by a strong emphasis on co-benefits, higher than average offset prices and existing "ethical buyer" criteria.

682 Conclusion

The 'moral hazard' criticism of offsetting is best seen as an hypothesis about how people might behave. Here, we find no evidence in support of it; rather the choice to offset is a sign of personal and corporate engagement with the challenges of sustainability. These findings may not represent the whole carbon market. We recognised that the study participants represented a niche market segment of small-scale, high-quality projects (and buyers of credits from these projects). However, the findings do highlight that offsetting practices by organisations and individuals may be more diverse than public discourse regarding offsetting might suggest. The carbon market is novel and complex. Project developers, carbon sellers and carbon standards therefore have a responsibility to guide buyers not only in transparent communication of projects and offsets, but also in the role of offsets in the transition to a low-carbon world. International climate policy is progressing, but corresponding governmental action still lacks the ambition and headway needed to limit global temperature rise to 2°C, as set out in the Paris Agreement. Voluntary carbon offsetting must support this broader goal. When it does it presents opportunities for the private sector and individuals to be part of this transition to zero carbon, and to strengthen global action above and beyond governmental action.

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