



Land Tenure Compliance Seals, v1.0
Certification Program
Tero Carbon Avaliações e Certificações S.A.



LAND TENURE COMPLIANCE SEALS

Certification Program

Version 1.0

TERO CARBON AVALIAÇÕES E CERTIFICAÇÕES S.A.

Dear Project Developers and Carbon Market Partners,

It is with great enthusiasm that we present the Land Tenure Compliance Seals for NBS Projects, a new milestone within the Tero Certification Program. Our mission goes beyond simple certification: we are committed to democratizing access to the carbon market, ensuring that Brazilian initiatives, regardless of their scale, can compete fairly and transparently on the global stage.

Land tenure security is one of the biggest challenges faced by Nature-Based Solutions (NBS) projects. Without a solid land tenure foundation, there is no guarantee of the permanence of environmental assets, which compromises the integrity of carbon credits and investor confidence. To address this reality, we have developed a seal system that classifies projects according to the regularity and consistency of their land compliance, promoting transparency, traceability and technical robustness.

Tero Carbon's Land Tenure Compliance Seals are a land tenure assurance mechanism, created to ensure the legal compliance of projects over time and differentiate those demonstrating a continuous commitment to land tenure regularity. These seals allow projects to be recognized for their credibility, legal security, and traceability, providing greater confidence to the market and investors, and allowing those who maintain compliance over time to be recognized for their credibility and legal security. The seals follow three progressive levels:

- **Bronze Seal:** Awarded to projects that prove, after one year, their land tenure documentation and territorial regularity.
- **Silver Seal:** Granted to projects that maintain three consecutive years of compliance with no identified irregularities.
- **Gold Seal:** The highest level of recognition, awarded to projects with five uninterrupted years of compliance, coupled with excellence in territorial and environmental management.

The implementation of the Land Tenure Compliance Seals reinforces Tero Carbon's commitment to ensuring that Brazilian projects meet the highest standards of the international carbon market. Additionally, it allows project developers to have a structured pathway to demonstrate their regularity, expanding their access to differentiated markets and attracting investors looking for initiatives with credibility and transparency.

Our Certification Program was designed to cater to both NBS projects and Technology-Based Solutions (TBS) projects, always adhering to the highest carbon market standards. We know that land tenure governance is one of the pillars for the stability and growth of this sector, and the Land Tenure Compliance Seals represent another step forward in building a solid, reliable, and accessible market for all. It is important to note that, in this first version, the seals apply only to land tenure compliance for rural properties located in Brazil.

We invite all project developers, investors, and carbon market partners to engage in this initiative, consolidating a new era of transparency and legal security for Brazilian environmental assets.

Manaus, February 10, 2025.

Yours sincerely,

A handwritten signature in black ink that reads "Francisco Higuchi". The signature is written in a cursive, flowing style.

Francisco Gasparetto Higuchi, PhD.
CEO, Tero Carbon

IDENTIFICATION

| | |
|-----------------------------------|---|
| DOCUMENT | Land Tenure Compliance Seals |
| VERSION | 1.0 |
| PROGRAM | Nature-Based Solutions (NBS) |
| SECTOR | Agriculture, Forestry, and Other Land Use (AFOLU) |
| TYPE | All Types |
| ASSETS | All Assets |
| MITIGATION | All Forms of Mitigation |
| GEOGRAPHY | Brazil |
| GOVERNANCE | Steering Committee |
| STATUS | In Public Consultation |
| PUBLIC CONSULTATION PERIOD | 02/10/2025 to 03/11/2025 (30 days) |

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ACRONYMS

| | |
|--------|---|
| AFOLU | Agriculture, Forestry, and Other Land Use |
| ANM | In English, National Mining Agency (<i>Agência Nacional de Mineração</i>) |
| APP | In English, Permanent Preservation Area (<i>Área de Proteção Permanente</i>) |
| CAR | In English, Rural Environmental Registry (<i>Cadastro Ambiental Rural</i>) |
| CCIR | In English, Rural Property Registration Certificate (<i>Certificado de Cadastro de Imóvel Rural</i>) |
| CDRU | In English, Grant of Real Right of Use (<i>Concessão de Direito Real de Uso</i>) |
| FSC | Forest Stewardship Council |
| ICMBio | In English, Chico Mendes Institute for Biodiversity Conservation (<i>Instituto Chico Mendes de Conservação da Biodiversidade</i>) |
| INCRA | In English, National Institute of Colonization and Agrarian Reform (<i>Instituto Nacional de Colonização e Reforma Agrária</i>) |
| INPE | In English, National Institute for Space Research (<i>Instituto Nacional de Pesquisas Espaciais</i>) |
| ITERPA | In English, Pará Land Institute (<i>Instituto de Terras do Pará</i>) |
| ITR | In English, Rural Land Property Tax (<i>Imposto sobre a Propriedade Territorial Rural</i>) |
| LI | Property Boundary |
| NBS | Nature-based Solution |
| PA | Project Area |
| PRAD | In English, Degraded Areas Recovery Plan (<i>Plano de Recuperação de Áreas Degradadas</i>) |
| PRADA | In English, Restoration Plan for Degraded or Altered Areas (<i>Plano de Recomposição de Áreas Degradadas ou Alteradas</i>) |
| RL | Legal Reserve |
| SICAR | In English, National Rural Environmental Registration System (<i>Sistema Nacional de Cadastro Ambiental Rural</i>) |

| | |
|-------|--|
| SIGEF | In English, Land Management System (<i>Sistema de Gestão Fundiária</i>) |
| SPU | In English, Secretariat of Union Heritage (<i>Secretaria do Patrimônio da União</i>) |
| TAC | In English, Terms of Conduct Adjustment (<i>Termos de Ajustamento de Conduta</i>) |
| TBS | Technology-Based Solutions |
| VVB | Validation/ Verification Body |

1. Introduction

Land tenure regularization is an essential element for the credibility and sustainability of Nature-Based Solutions (NBS) projects in the international carbon market. The Tero Carbon Certification Program sets rigorous standards to ensure land tenure compliance for certified projects, mitigating legal and environmental risks.

This document has been developed to serve as a clear and objective technical reference for project developers, Brazilian landowners, and validation/verification bodies (VVBs), ensuring that all parties involved understand the applicable requirements and criteria.

2. Goals and Objectives

This document aims to define the guidelines and requirements for obtaining, maintaining, and potential sanctions related to the Land Tenure Compliance Seals within the Tero Carbon Certification Program.

The goal is to establish a reference standard that allows Brazilian NBS project developers to ensure the necessary land tenure regularity for the safe and transparent trading of carbon credits.

The specific objectives are:

- Establish clear rules for obtaining and maintaining the Tero Carbon Land Tenure Compliance Seals (Bronze, Silver, Gold);
- Define the mandatory documents for the validation (pre-implementation) and verification (continuous monitoring) phases of NBS projects, segregated by property type (private and public); and
- Serve as a technical reference for developers, investors, and validation/verification bodies (VVBs), ensuring transparency and alignment with the requirements of the global carbon market.

3. Land Tenure Compliance Seals for NBS Projects

The Tero Carbon Land Tenure Compliance Seals were designed to provide a clear and objective indication of the land tenure regularity of an NBS project

over time. This seal system helps investors and carbon credit buyers assess the legal robustness of projects.

3.1. Seals Categories

| CATEGORY | REQUIREMENTS |
|----------|---|
| Bronze | 1 uninterrupted year of land tenure and documentation regularity after project validation |
| Talk | 3 consecutive years of compliance without violations |
| Gold | 5 consecutive years of compliance, in addition to good socio-environmental practices |

3.2. Progression Rules

| PROGRESSION | REQUIREMENTS |
|-----------------|---|
| Bronze → Silver | Three annual audits with no non-compliances |
| Silver → Gold | Five consecutive years of land tenure compliance and adoption of good socio-environmental practices |

3.3. Commercial Advantages of the Seals

The land tenure compliance seals can offer strategic benefits for NBS project developers, landowners, and asset holders, facilitating access to the market and increasing attractiveness to investors and carbon credit buyers.

| CATEGORY | SUGGESTED COMMERCIAL ADVANTAGES |
|----------|--|
| Bronze | Access to basic markets |
| Silver | Access to premium markets and reduced due diligence costs |
| Gold | Price premium, greater credibility and preference by international investors |

3.4. Criteria for Losses or Downgrades

The maintenance of the seal is subject to the continuous observance of compliance rules. Depending on the severity of the irregularities, a project may be downgraded in category or lose the seal.

| TYPE OF VIOLATION | EXAMPLES | ACTION |
|-------------------|---|---|
| Severe | Land grabbing, document fraud, illegal deforestation, concealment of information | Immediate loss of seal and exclusion/ banishment from Tero Carbon for 5 years |
| Moderate | Delay in document renewal for more than 90 days, unreported changes to property boundaries, unattended complaints | Seal downgrade or temporary loss |
| Mild | Delay in delivery of monitoring documents, unintentional errors in vector files (<i>shapefiles</i>) | Seal suspension for 90 days |

4. The Certification Process and Land Tenure Analysis

As presented in Tero Carbon's Certification Program, the certification process for NBS projects follows two main stages:

- **Validation:** Initial analysis of land tenure documents and an independent audit to ensure project eligibility.
- **Verification:** Periodic audit of the project's land tenure status, ensuring continuous compliance with the criteria.

The certification process for a project at Tero Carbon follows a sequential flow of macro-activities, as illustrated in **Figure 1**, indicating the stages where land tenure analysis takes place.

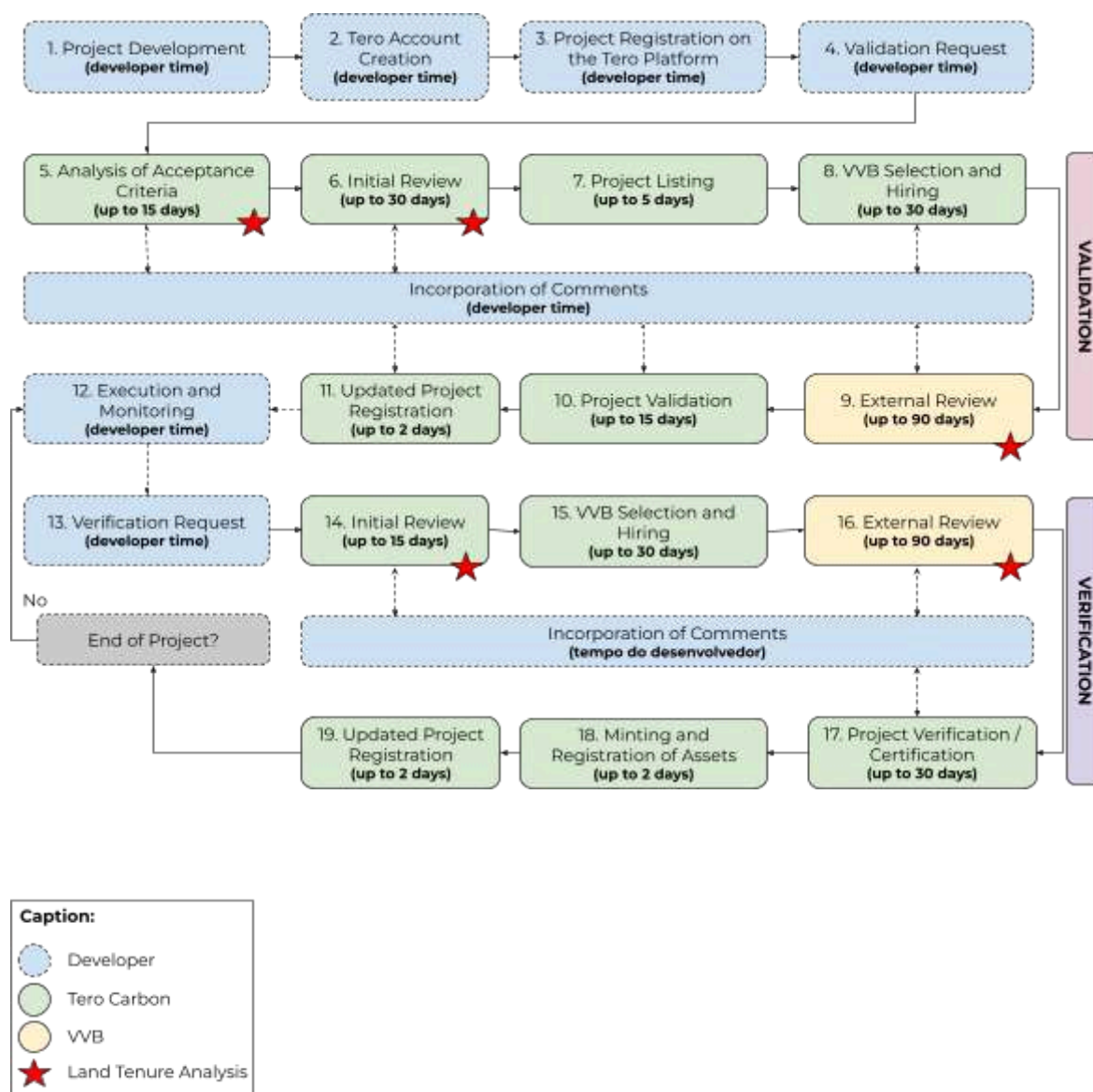


Figure 1: Flowchart of the steps and processes required for project certification at Tero Carbon with indication of land tenure analysis.

5. Land Tenure Compliance in NBS Project Validation

Land tenure compliance is a fundamental requirement for the viability and credibility of Nature-Based Solutions (NBS) projects in Brazil. In this context, unequivocal proof of ownership and land tenure regularity is essential to mitigate legal, environmental, and reputational risks. Aware of these

challenges, Tero Carbon establishes rigorous criteria to ensure that projects not only comply with Brazilian legislation but also meet international integrity standards.

To obtain initial certification, projects must submit documentation proving the legality of land ownership or possession.

5.1. Mandatory Documentation by Property Type

5.1.1. Private Properties

The regularization of private properties requires proof of ownership history, as well as fiscal and environmental compliance.

Table 1. Proof of ownership or possession.

| DOCUMENT | DESCRIPTION | WHO ISSUES | EXAMPLE LINK |
|--|---|-------------------------------|---|
| Final Title | Document proving property ownership | State Land Institute or INCRA | ITERPA or INCRA |
| Complete Ownership Chain | Full history of property transfers (also known as "soul") | Property Registry Office | Contact your local registry office |
| Acquisition Title (if the owner is not the original one) | Document proving the legal acquisition of the property | | |

Table 2. Certificates.

| DOCUMENT | DESCRIPTION | WHO ISSUES | EXAMPLE LINK |
|--|---|-------------|-----------------------|
| CCIR (Rural Property Registration Certificate) | Registration of the rural property with INCRA | INCRA/SIGEF | SIGEF |

Table 3. Certificates.

| DOCUMENT | DESCRIPTION | WHO ISSUES | EXAMPLE LINK |
|---|--|--|---|
| Updated Property Registration Certificate (Full or Narrative Version) | Certificate issued within the last 6 months, containing at least 15 years of ownership history | Land Registry Office | Contact your local registry office |
| Encumbrance Certificate (Negative Lien Certificate) | Indicates whether there are any encumbrances on the property | | |
| Certificate of Real and Personal Reipersecutory Actions | Indicates whether there are any real or personal legal actions affecting the property | | |
| Certificate of Ownership Legitimacy | Confirms valid ownership of the property | State Land Institute | ITERPA |
| Negative Rural Land Tax (ITR) Certificate | Proves the settlement of the Rural Land Tax | Federal Revenue Service | Federal Revenue Service |
| Negative Environmental Certificate | Declares the absence of environmental fines and/or legal proceedings | State and Municipal Environmental Agencies | Contact local environmental departments |

Table 4. Declarations.

| DOCUMENT | DESCRIPTION | WHO ISSUES | EXAMPLE LINK |
|------------------------------------|--|-------------------------|---|
| ITR Declaration | Proof of the last Rural Land Tax declaration | Federal Revenue Service | Federal Revenue Service |
| CAR (Rural Environmental Registry) | Updated status, without pending issues or overlaps (ideally already approved by the regional environmental agency) | SICAR (Federal) | SICAR Systems |

Table 5. Others (Supplementary, Non-Mandatory).

| DOCUMENT | DESCRIPTION | WHO ISSUES | EXAMPLE LINK |
|---|---|---|--------------------------------|
| Terms of Conduct Adjustment (TACs) | Agreement for environmental regularization (mandatory submission if applicable) | Public Prosecutor's Office and/or Regional Environmental Agency | Varies by state |
| PRAD/PRADA | Approved Degraded Areas Recovery Plan | Regional Environmental Agencies | Varies by state |
| Lease/Lending Agreement | Formal authorization for use of private property | Involved Parties | N/A |
| Bank Financing Agreement | Document proving that the property is subject to a bank loan or financing agreement | Financial Institutions | Varies by institution |
| Environmental Licensing | Required for activities such as forest management or other land uses | Regional Environmental Agencies | Varies by state |
| Third Party Certificates (FSC, Organic) | Proof of previous sustainable practices | Certification Organizations | Ex. FSC Brazil |

Checklist for Private Properties:

- ☐ Authenticated Final Title;
- ☐ Ownership Chain covering at least the last 15 years;
- ☐ Authenticated Acquisition Title (if the owner is not the original);
- ☐ Updated Property Registration Certificate (Full or Narrative Version) (≤ 6 months);
- ☐ Valid CCIR;
- ☐ Certificate of Ownership Legitimacy;
- ☐ Certificate of Real and Personal Reipersecutory Actions;
- ☐ Negative Certificates (ITR, Encumbrances, Environmental);
- ☐ Proof of the latest Rural Land Tax (ITR) declaration;
- ☐ Active CAR with no pending issues; and

- ☐ Valid supplementary documents, if applicable (TACs, PRAD/PRADA, Contracts, Bank Financing Agreement, Licenses, Third-Party Certifications, etc.).

5.1.2. Public Properties

Projects in Public Areas Require Specific Authorizations and Proof of Compliance with Sustainable Use Policies.

Table 6. Authorizations.

| DOCUMENT | DESCRIPTION | WHO ISSUES | EXAMPLE LINK |
|-------------------------------------|---|---------------------------------------|---------------------|
| Concession of Real Use Right (CDRU) | Authorization for sustainable use of public lands | SPU or managing agency (e.g., ICMBio) | SPU |

Table 7. Certificates.

| DOCUMENT | DESCRIPTION | WHO ISSUES | EXAMPLE LINK |
|--|---|-------------|-----------------------|
| CCIR (Rural Property Registration Certificate) | Registration of rural property with INCRA | INCRA/SIGEF | SIGEF |

Table 8. Certificates.

| DOCUMENT | DESCRIPTION | WHO ISSUES | EXAMPLE LINK |
|---------------------------------------|---|--|----------------------------|
| Negative Certificate of Property Debt | Confirms the absence of financial pending issues with the Secretariat of Union Heritage | SPU | SPU |
| Certificate of Property Status | Certifies the current status of the property regarding occupancy | | |
| Non-Expropriation Certificate | Confirms absence of expropriation processes | Municipalities/ State Governments | Varies by location |
| Negative Environmental Certificate | Declares absence of environmental fines or legal proceedings | State and Municipal Environmental Agencies | Contact local secretariats |

Table 9. Others (Supplementary, Not-Mandatory).

| DOCUMENT | DESCRIPTION | WHO ISSUES | EXAMPLE LINK |
|---|--|--|--------------------------------|
| Terms of Conduct Adjustment (TACs) | Agreement for environmental regularization (mandatory if applicable) | Public Prosecutor's Office or environmental agency | Varies by state |
| PRAD/PRADA | Approved Degraded Area Recovery Plan | State Environmental Agency | Varies by state |
| Lease/Commodatum Agreement | Approved Degraded Area Recovery Plan | Managing public entity (e.g. ICMBio) | ICMBio |
| Environmental Licensing | Required for activities such as forest management or other land uses | State Environmental Agency | Varies by state |
| Third-Party Certifications (FSC, Organic, etc.) | Proof of prior sustainable practices | Certification Organizations | Ex. FSC Brazil |

Checklist for Public Properties:

- ☐ Valid CDRU or Use Contract;
- ☐ Negative Expropriation Certificate (all three government levels);
- ☐ Negative Debt Certificates (CNDs);
- ☐ Valid CCIR; and
- ☐ Valid Supplementary Documents, if applicable (TACs, PRAD/PRADA, Contracts, Environmental Licensing, Good Practices Certifications).

5.2. Mandatory Geographic Information

Mandatory geographic information is essential to ensure transparency, accuracy, and integrity in NBS carbon projects. Data such as central coordinates, detailed vector files (Shapefiles), and land use history allow for the clear identification of property boundaries, preventing overlaps with protected

areas (Indigenous Lands, Conservation Units, etc.) or land tenure conflicts. Additionally, these data facilitate continuous monitoring of Legal Reserves (RL) and Permanent Preservation Areas (APP), ensuring compliance with the Forest Code and the permanence of carbon stocks.

Geographic traceability is also crucial for independent audits and the validation of credits in the international market, where investors require technical proof and compliance with strict standards. Without this information, projects face risks such as legal disputes, credit invalidation, and loss of credibility, which can compromise both environmental outcomes and financial returns.

Table 10. Geographic Requirements.

| ITEM | DESCRIPTION | FORMAT/DETAILS |
|---|---|--|
| Central Coordinate | Latitude and longitude of the property's geographic center | Coordinate system: SIRGAS 2000 and WGS84 |
| Vectorial Files (<i>Shapefile</i>) | Georeferenced file containing: Property Boundary (LI); Legal Reserve (RL); Permanent Preservation Area (APP); Project Area (PA); Relevant Hydrography (rivers, springs) | Formats: .shp, .dbf, .shx, .prj (SIRGAS 2000), .kml/kmz (World Geodetic System WGS84- Google Maps) |
| Land Use History Maps (Property and Surroundings) | Georeferenced map image (15 years) with a visual representation of the boundaries mentioned above (rural property) and surroundings. Recommended sources: MapBiomas, INPE, or platforms with auditable data. | Format: GeoTIFF or georeferenced PNG - SIRGAS 2000 (minimum resolution of 30m/pixel - LandSat) |

Geographic Information Checklist:

- ☐ Central coordinate of the rural property (SIRGAS 2000 and WGS84);
- ☐ Vector files (Shapefile) with LI, RL, APP, PA, and hydrography (SIRGAS 2000) of the property;
- ☐ Images (maps) showing the land use history (last 15 years) in a georeferenced format for the property and its surroundings; and
- ☐ Compatibility with Google Earth (KML/KMZ).

5.3. Additional Land Tenure Compliance Criteria

In addition to the documentation required during the validation phases, certain additional criteria must be observed to ensure that the project complies with best land tenure and environmental practices. These criteria complement the basic requirements and provide an extra layer of legal and environmental security for projects certified by Tero Carbon.

5.3.1. Overlap Analysis

Overlap analysis is a critical step in preventing land tenure conflicts and ensuring that the project does not encroach upon protected areas or third-party territories. A project is only eligible if no overlaps are identified.

The use of geospatial tools enables the detection and correction of potential irregularities before certification. For this purpose, the CAR (Rural Environmental Registry) will be analyzed to confirm no overlaps with:

- ☐ Indigenous Lands (Law nº 6,001/1973);
- ☐ Conservation Units (SNUC - Law nº 9,985/2000);
- ☐ Quilombola Territories (Decree nº 4,887/2003);
- ☐ Rural settlements (INCRA);
- ☐ Registered carbon credit projects;
- ☐ Other private properties; and
- ☐ Mining processes at ANM.

5.3.2. Land Use History (last 15 years)

Assessment of land use history for at least the last 15 years is essential to ensure that the project area has not been subject to activities that could compromise its eligibility for certification. Past activities that compromise the project:

- Illegal mining;
- Cultivation of prohibited crops (drug trafficking);
- Deforestation in RL areas after 2008; and
- Any illegal or unlicensed activity.

Satellite image records and monitoring data of the rural property and its surroundings are essential for this verification. will be analyzed:

- ☐ Maps based on satellite images dating back at least 15 years, using official data (such as MapBiomas and INPE), to represent the area of the property and its surroundings; and
- ☐ Proof of absence of illegal deforestation post-2008.

5.4. Land Tenure Information Validation Flow

The flow of land information validation follows a structured process to ensure that all requirements are met in a rigorous and transparent manner. This methodology allows for a detailed assessment of the land regularity of projects from the initial phase to periodic verification. The step-by-step process includes:

1. **Pre-Analysis:** Initial documentation verification.
2. **Due Diligence:** Analysis of overlaps and legal compliance.
3. **Auditorium (VVB):** Verification by an independent body.
4. **Validation:** Land tenure validation after approval.

6. Land Tenure Compliance in NBS Project Verification

The monitoring phase of Nature-Based Solutions (NBS) carbon projects is not limited to the measurement of carbon stocks or the verification of environmental results. It is equally crucial to ensure the maintenance of land compliance throughout the project lifecycle. Land documents with limited validity, changes in legislation, or new territorial overlaps can compromise the project's continuity and the integrity of the credits generated.

To mitigate these risks, Tero Carbon requires that projects undergo periodic audits to ensure the continuous regularity of land documentation and the adequacy of geospatial records. This process strengthens the credibility of the carbon credits issued and ensures legal security for investors and other stakeholders.

6.1. Land Documentation for Periodic Verification

6.1.1. Private Properties

Documents with limited validity or subject to changes must be resubmitted at each monitoring cycle.

Table 11. Proof of property or possession maintenance.

| DOCUMENT | DESCRIPTION | VALIDITY | WHO ISSUES |
|--|---|----------|--------------------------|
| Updated Property Registration Certificate (Full Text or Narrative) | Property registration certificate issued within the last 3 months | 3 months | Property Registry Office |

Table 12. Proof of absence of debts or liabilities.

| DOCUMENT | DESCRIPTION | VALIDITY | WHO ISSUES |
|---|--|----------|--|
| ITR Negative Debt Certificate | Proves payment of the Rural Territorial Tax | 6 months | Federal Revenue |
| Real Encumbrances Certificate (Negative of Pledge) | Absence of real encumbrances on the property | 3 months | Property Registry Office |
| Certificate of Real and Personal Actions (Reipersecutory) | Absence of real or personal actions on the property | 3 months | Property Registry Office |
| Environmental Negative Certificate | Declares absence of environmental fines or processes | 1 year | State and Municipal Environmental Agencies |

Table 13. Maintenance of CAR without liabilities.

| DOCUMENT | DESCRIPTION | VALIDITY | WHO ISSUES |
|------------------------------------|---|----------|-----------------|
| CAR (Rural Environmental Registry) | Updated status, without liabilities or overlaps | Ongoing | SICAR (Federal) |

Table 14. Others (Supplementary, Non-Mandatory).

| DOCUMENT | DESCRIPTION | VALIDITY | WHO ISSUES |
|---|---|-------------------|---|
| TAC/PRAD Compliance Report | Proof of environmental goal compliance | 1 year | Environmental Agency or Public Prosecutor |
| Lease/Comodato Agreement | Formal authorization for private property use | 3 months | Involved Parties |
| Environmental Licensing | Renewal, if applicable | Varies by license | Competent Environmental Agency |
| Third Party Certificates (FSC, Organic) | Renewal, if applicable | Varies by license | Certification Organizations |

Checklist for Private Properties:

- ☐ Updated Property Registration Certificate (Full Text or Narrative) (\leq 3 months);
- ☐ ITR Negative Debt Certificate (\leq 6 months);
- ☐ Real Encumbrances / Negative of Pledge Certificate (\leq 3 months);
- ☐ Real and Personal Actions Certificate (\leq 3 months);
- ☐ Environmental Negative Certificate (\leq 1 year);
- ☐ CAR without new liabilities;
- ☐ TAC/PRAD Compliance Report (\leq 1 year, if applicable);
- ☐ Lease/Comodato Agreement (\leq 3 months, if applicable);
- ☐ Renewal of Environmental Licenses (if applicable); and
- ☐ Renewal of Third-Party Certifications (if applicable).

6.1.2. Public Properties

The maintenance of authorizations and any contracts is essential for NBS projects on public lands.

Table 15. Proof of maintenance of use authorizations.

| DOCUMENT | DESCRIPTION | VALIDITY | WHO ISSUES |
|--------------------------------|---------------------------------------|--------------------|---------------------------------------|
| Real Right to Use Grant (CDRU) | Renewal or proof of contract validity | Varies by contract | SPU or managing agency (e.g., ICMBio) |

Table 16. Proof of absence of debts or liabilities.

| DOCUMENT | DESCRIPTION | VALIDITY | WHO ISSUES |
|--|--|----------|---|
| Certificate of No Expropriation | Certifies absence of expropriation processes | 1 year | Federal, State, and Municipal Governments |
| Certificate of Property Situation | Certifies the current status of the property regarding its occupancy | 1 year | Union Heritage Secretariat (SPU) |
| Negative Certificate of Property Asset Debts | Confirms the absence of pending issues with the SPU | | |
| Negative Environmental Certificate | Declares absence of environmental fines or processes | 1 year | Regional Environmental Agencies |

Table 17. Others (Supplementary, Non-Mandatory).

| DOCUMENT | DESCRIPTION | VALIDITY | WHO ISSUES |
|---|--|-------------------------|---|
| TAC/PRAD Compliance Report | Proof of Compliance with Environmental Goals | 1 year | Environmental Agency or Public Prosecutor |
| Lease/Comodato Agreement | Proof of renewal or contract validity | Varies by contract | Public managing entity |
| Environmental Licensing | Renewal, if applicable | Varies by license | Competent Environmental Agency |
| Third-Party Certifications (FSC, Organic) | Renewal, if applicable | Varies by certification | Certification Organizations |

Checklist for Public Properties:

- ☐ CDRU or valid use contract;
- ☐ Negative Certificate of Expropriation (≤ 1 year);
- ☐ Negative Certificate of Property Asset Debts - SPU (≤ 1 year);
- ☐ Certificate of Property Situation - SPU (≤ 1 year);
- ☐ Renewed environmental licensing (if expired);
- ☐ TAC/PRAD compliance report (≤ 1 year);
- ☐ Maintenance of Lease/Commodatum Agreement (if applicable);
- ☐ Renewal of Environmental licenses (if applicable); and
- ☐ Renewal of Third-Party Certifications (if applicable).

6.2. Additional Monitoring Criteria

Maintaining land tenure compliance requires continuous checks to identify changes that might compromise the project's regularity. This process includes analyzing new territorial overlaps and monitoring the land use history to ensure that the project remains within the standards required by the Tero Carbon Certification Program.

6.2.1. Analysis of New Overlaps

Continuous geographic monitoring of project areas is important to detect and correct any new overlaps, especially with private properties. Through geospatial tools and updated databases, it is possible to verify if new land records or territorial changes impact the project's compliance. In this regard, the following is performed:

- CAR Review: Verification for new overlaps with:
 - ☐ Indigenous Lands;
 - ☐ Conservation Units;
 - ☐ Private Properties; and
 - ☐ Mining processes at ANM.
- Shapefile Update: Including changes in the property boundaries or project areas.

6.2.2. Ongoing Land Use Evaluation (Monitored Period)

After analyzing the historical land use, it is essential that monitoring continues annually to ensure that no changes occur that could compromise the project's compliance. The continuous update of maps obtained through satellite imagery geoprocessing allows for the identification of deforestation, environmental degradation, or other changes that may impact certification. This annual monitoring measure ensures the permanence of carbon stocks and the credibility of the generated credits. This stage requires:

- ☐ Set of land use maps based on satellite images updated with the monitored period, using official data (such as MapBiomas and INPE);
- ☐ Proof of absence of illegal deforestation during the monitored period.

6.3. Land Tenure Information Validation Flow

In the verification phase, projects must demonstrate that they have maintained compliance over time by resubmitting updated documents periodically. The step-by-step process of this verification includes::

5. **Pre-Analysis:** Initial documentation verification.
6. **Due Diligence:** Analysis of overlaps and legal compliance.
7. **Auditorium (VVB):** Verification by an independent body.
8. **Validation:** Land tenure validation after approval.

7. References

Brazilian Legislation and Standards

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Websites and Platforms

National Mining Agency (ANM). Consultation on mining processes: [ANM](#).

IBAMA – Environmental Licensing. Information about assessments and processes: [IBAMA](#).

ICMBio – Conservation Units. Data on federal conservation units: [ICMBio](#).

INCRA – SIGEF System. CCIR issuance and consultation of rural properties: [SIGEF](#).

MapBiomass. Land use monitoring platform: [MapBiomass](#).

Prodes (INPE). Land use monitoring platform. [INPE/PRODES](#).

SPU – Secretariat of Union Heritage. Issuance of negative certificates: [SPU](#).

SICAR – National CAR System. Rural Environmental Registry: [SICAR](#).

International References

Paris Agreement (Article 6). Guidelines for carbon markets under the UNFCCC. Available at: [UNFCCC](#).

ICROA – Code of Best Practices. Integrity standards for carbon credits. Available at: [ICROA](#).

Guides and Technical Publications

Land Guide – Applied for Carbon Project Developers in Brazil. Published by Aliança Brasil NBS, this guide offers practical guidance on land regularization and territorial management for NBS projects. Available at: [Brazil NBS Alliance](#).

Tero Carbon

Tero Programs. Certification Programs, Methodologies and Registration and Use of Assets. Available at: [Tero Carbon](#).

Tero Methodologies. Published NBS and TBS methodologies. Available at: [Tero Carbon](#).



Version History

| VERSION | DATE | NOTES |
|---------|------------|--|
| 1.0 | 02/10/2025 | Initial version approved by Management and released for public consultation. |