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Malagasy Civil Society Organisations

To

**VERRA,
BIO
and FINNFUND**

Subject: Request for clarification regarding the SATROKALA ARR Grouped Project - Id 5755 - by JTF Tozzi Green in the Ihorombe region of Madagascar.

Ladies, Gentlemen,

It is with deep concern that we recently learned from our international partners working on carbon credits about the progress of the certification process for the SATROKALA ARR Grouped Project carbon credit.

We would therefore like to ask you three sets of questions.

1. Context and existence of conflicts

As already mentioned in various documents (1) (2), the majority of the population has never agreed to lease land to Tozzi Green in the Ihorombe region since 2012, but has been forced to do so by the authorities. The majority of the inhabitants, livestock farmers and farmers, continue to demand

* that the company leave the land it currently occupies,

* that the State not allocate additional land to it for lease or sale,

* and that the planned expansion of tree plantations, which currently cover 4,000 hectares, to 6,000 hectares be halted.

Did you know that a large part of this area consists of grazing land for the Bara community's livestock, inherited from their ancestors for generations? It is important to note that the culture and customs of these Bara communities are closely linked to cattle farming, which gives this land great historical, cultural and social value.

Did Tozzi Green inform you of these conflicts during your discussions?

Due to land grabbing and the failure to respect the rights of local communities, we have taken action with the OECD (3).

2. Regularity of procedures and accountability of stakeholders

We wrote to the Italian government and banks in May 2024, pointing out that the company had not invited important associations from the municipality of Ambatolahy to participate in the consultation (4).

During a meeting with the raiamandreny (elders) in May 2024 in the meeting room of Ambatolahy Municipality, all participants confirmed that the inhabitants were opposed to the tree planting project for various reasons, the main one being increased insecurity.

Our second set of questions will therefore be:

- * If you are well informed about this project, have you checked that the procedures have been followed correctly?
- * Which of the inhabitants of Ambatolahy approved the tree planting project, thereby enabling the company to obtain an environmental permit? And when?
- * Do you think that the minority group known to have agreed to cede land to the company for various reasons (pressure, fear, etc.), invited to meetings in Satrokala, corresponds to the local communities to be consulted in order to verify the company's good relations with the affected populations, according to the code of conduct of your respective institutions?
- * When do you verify this point before financing or evaluating a company in the context of carbon credits?
- * Do you believe that your role as public funders of Tozzi Green is not also to monitor how the land that was the focus of the project you funded is being used?
- * Do you not think it is necessary to hold a new consultation to obtain the consent of the population regarding the transformation of an agricultural project into a carbon credit project?
- * Have you asked Tozzi Green to present the procedures carried out to you?

3. Details of the latest assessment survey

Our third set of questions relates to the December 2025 survey.

Some residents were informed in writing that an assessment survey would soon be conducted.

We would like to ask:

- * Are you aware of this?
- * What were the criteria for selecting the people invited/surveyed?
- * Is only one municipality concerned by this survey, even though the tree plantations cover three municipalities?
- * It would appear that no survey was conducted in the municipalities of Andiolava and Ambatolahy?

We, Malagasy civil society organisations, BIMTT, Collectif pour la défense des terres malgaches - TANY, Fiantso, Komity Miaro ny Tany Tampon'Ihorombe, Comité National pour l'Agriculture Familiale, Solidarity of Land Stakeholders (SIF), who have been supporting local communities in the Ihorombe region whose land has been

seized by JTF Tozzi Green for over a decade, hope to receive a response from you before 31 January 2026 and send you our respectful greetings.

19 December 2025

BIMTT,
Collectif pour la défense des terres malgaches - TANY,
Comité National pour l'Agriculture Familiale,
Komity Miaro Ny Tany Tampon'Ihorombe,
ONG Fiantso,
Solidarité des Intervenants sur le Foncier (SIF)

On behalf of the 6 organizations

Mamy Rakotondrainibe
Chairwoman of Collectif TANY

References :

(1) Land grabbing in Madagascar – Echoes and testimonies 2013:

<https://www.recommon.org/en/land-grabs-madagascar-voices-ground-2013-report-launch/>

(2) Entraide et Fraternité, La Belgique, complice d'accaparement de terres à Madagascar ? https://www.entraide.be/etude2022_tozzi-green

(3) Des associations déposent une plainte contre la société italienne JTF Tozzi Green:

<https://www.foncier-developpement.fr/actualite/des-associations-deposent-plainte-contre-la-societe-italienne-jtf-tozzi-green-pour-ses-activites-menees-a-madagascar/>

(4) Lettre ouverte à Tozzi Green, aux banques BIO et Finnfund et au gouvernement italien:

<https://farmlandgrab.org/post/32230-open-letter-to-tozzi-green-bio-finnfund-and-the-gouvernement-of-italy>