

Maderacre's response to a web article published in

<https://ojo-publico.com/5873/perdida-bosques-proyectos-bonos-carbono-del-grupo-wong>

MADERACRE SAC is a company dedicated to the sustainable forest management of tropical forests in the Peruvian Amazon Rainforest. Our goal is to develop nature-based solutions that effectively conserve forests, contributing to the sustainable development of rural communities and mitigating climate change. In the province of Tahuamanu, Madre de Dios, we manage a forest management unit (FMU) of approximately 270,000 hectares. We carry out forest management with sustainable timber production under a highly selective, low-impact harvesting system based on natural regeneration. With an integrated, ecosystem-based management approach, two climate projects have been developed in this area to reduce greenhouse gas emissions under the REDD+ scheme. One of these is the Madre de Dios Amazon REDD+ Project, which has been implemented since 2009 on an area of nearly 100,000 hectares, and, since 2017, the Tahuamanu Amazon REDD+ Project, which occupies an area of more than 170,000 hectares. On the other hand, RECIFE SAC has been implementing the Iñapari Amazon REDD+ Project since 2023.

Regarding the quotes presented in the article published by

OjoPublico

Quote (A):

"The first of these initiatives is the Tahuamanu Amazon Redd Project, with more than 171,000 hectares of forest managed by Maderacre. In this case, the deforestation figures reported by the company differ from those shown in the satellite maps analyzed by this publication.

In its October 2024 monitoring report, Maderacre estimated a deforestation rate of 125 hectares within its project area (using 2017 figures); however, the maps show more than double that figure: 318 hectares."

Original Quote (A) in Spanish:

"La primera de las iniciativas es Tahuamanu Amazon Redd Project, con más de 171.000 hectáreas de bosque a cargo de Maderacre. En este caso, las cifras sobre deforestación declaradas por la empresa difieren de las que arrojan los mapas satelitales analizados por este medio.

En su reporte de monitoreo de octubre del 2024, Maderacre estimó una tasa de deforestación de 129 hectáreas dentro del área de su proyecto (con cifras al 2017); sin embargo, los mapas establecen más del doble: 318 hectáreas."

Our response:

The report is confusing concepts.

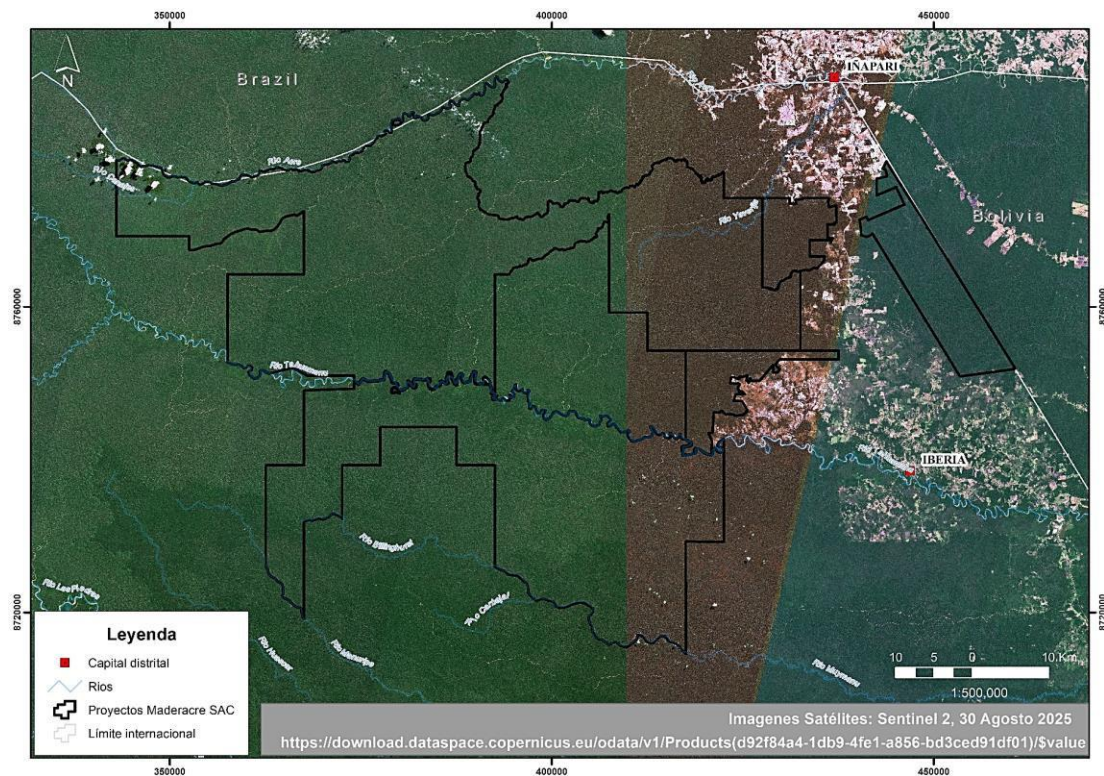
Deforestation means the loss of permanent forest cover, which involves a change in land use. This involves clearing forests through destructive methods and replacing them with rotational crops or livestock pastures (the most common practice in the Tahuamanu region), as well as for the development of illegal mining or the establishment of illicit crops. Deforestation activities typically remove all forest biomass through slash-and-burn methods, destroying the existing forest ecosystem and directly affecting biodiversity and habitats. This activity does so without respecting

fragile ecosystems or without following minimum environmental parameters. It even causes forest fires that spread to surrounding areas, increasing the magnitude of their impact and potentially causing highly significant damage.

On the other hand, degradation is the partial loss of forest cover, mainly linked to forest management operations. Temporary degradation due to low-impact forestry activities through selective logging (less than one tree per hectare, harvested every 30 years in the case of Maderacre), allows the structure and dynamics of forest ecosystems to be maintained. In other words, forests remain forests in perpetuity, maintaining healthy and viable populations of wild flora and fauna over time. It should be noted that, due to the rotational nature of forest management based on natural regeneration, areas degraded by management activities regenerate their forest cover in only a few years.

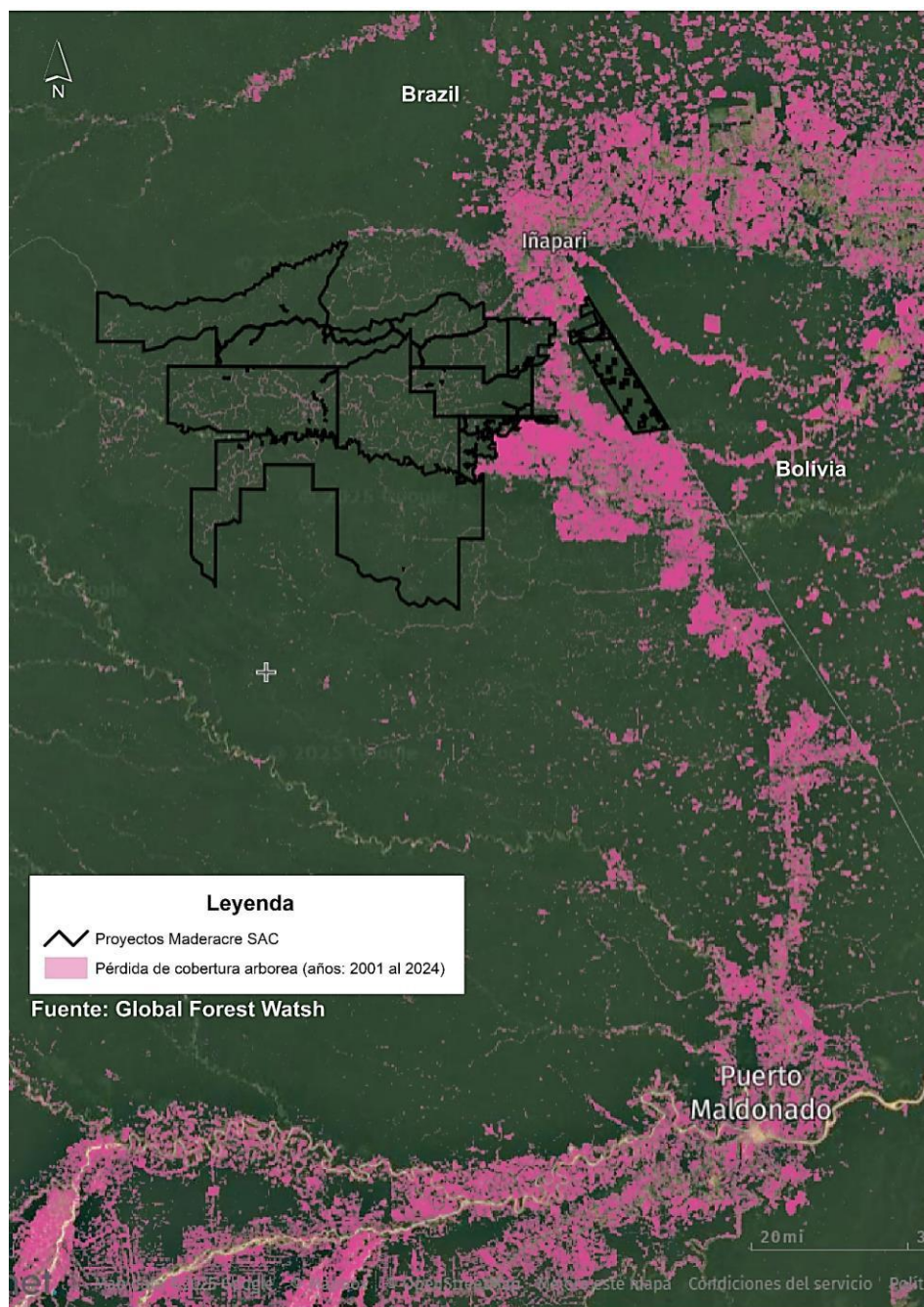
Below is a recent satellite image (August 2025) of the area of the projects developed by Maderacre and its surrounding areas. The difference between an area with conserved forests (like the one in Maderacre's projects) and areas deforested due to land use change can be clearly seen to the right of the image.

Figure 1: Satellite image of deforestation in the immediate vicinity of the projects. Maderacre carbon



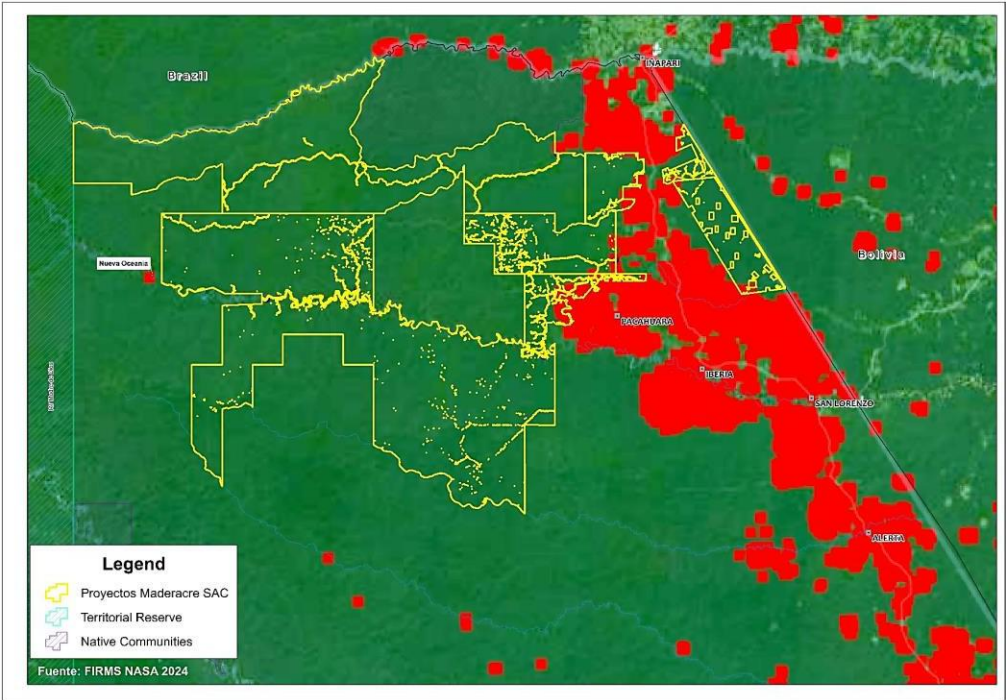
This obvious situation has not been highlighted in the OjoPublico report and its specialists, as the report does not show the immediate surroundings of the projects promoted by Maderacre, which are seriously affected by deforestation and wildfires. Figure 2 shows the forest loss in the vicinity of Maderacre's projects, using information from the Global Forest Watch (GFW) platform, the same source used by OjoPublico in its report.

Figure 02: Forest loss in the Maderacre project surrounding area according to GFW



Although forest fires in the province of Tahuamanu have doubled during the 2022-2024 period, wildfires in the Maderacre FMU area are effectively controlled. The incidence of wildfires in the Maderacre project area has decreased from 4.3% in 2022 to 0% so far in 2025 (the proportion of the number of fires within the FMU area relative to the total number of fires in the province). This proves that the actions implemented by Maderacre to protect forests from external agents are working. Below is an image with information provided by NASA's FIRMS platform on the wildfires that occurred in the area surrounding the Maderacre projects in 2024.

Figure 3: Forest fires in the area surrounding the Maderacre projects for the year 2024 according to NASA's FIRMS platform:



Temporary and low-scale degradation caused by implemented forestry activities and custody by Maderacre's forest management operations represent less than 0.5% of the forest management unit's (FMU) area annually. Maderacre annually monitors the quality of its operations and quantifies the level of degradation in the area. This can be seen in Figures 4 and 5. Figure 4 shows the loss of cover due to forestry operations in 2018. The secondary roads and open stockpile yards are seen as a loss of forest cover, but it will only be temporary. Figure 5 shows that two years after harvesting (2020), the yards and secondary roads have forest cover again. This plot will not be intervened again in 30 years, due to the project's rotation cycle, so it will remain as a forest. There is no change in land use, and the ecosystem and its biodiversity are maintained. That is, it should not be considered or added as deforestation.

Figure 4: Harvest Plot Operations 2018

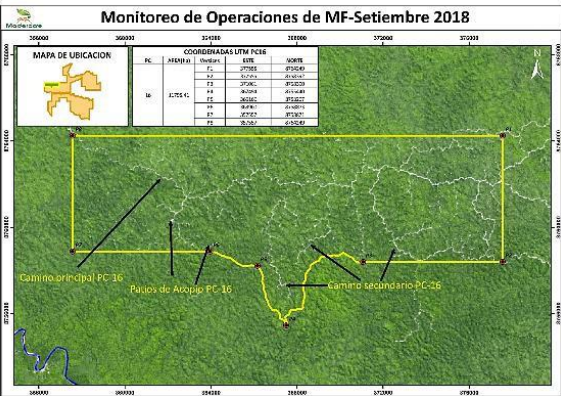


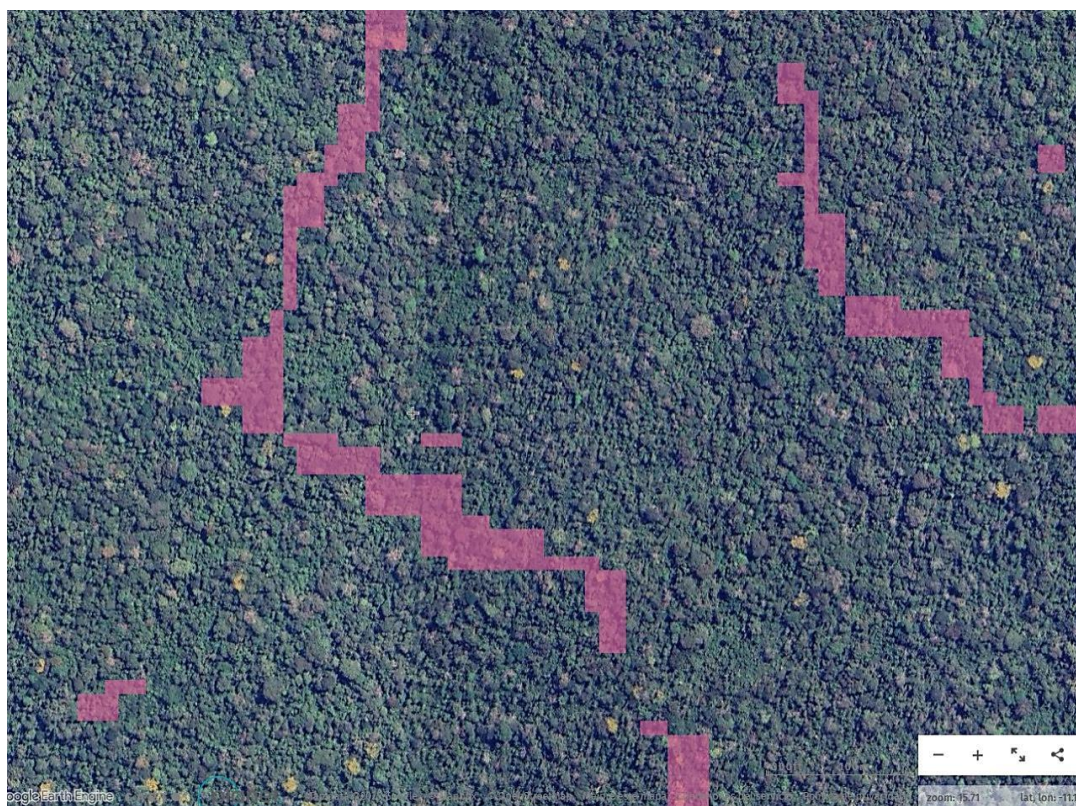
Figure 5: Harvest Plot 2 years later



Carbon emissions caused by the temporary, small-scale degradation of Maderacre are discounted from carbon credit calculations, which is taken into consideration in the methodologies established by the carbon project certification body, in this case VERRA.

In the following image you can see the regeneration, using the same source as the used by OjoPublico. In translucent pink you can see an area that was once designated for a logging road has now recovered all its forest cover. However, OjoPublico's analysis considers this deforestation. Note in the recent satellite image that the forest cover is intact beneath the coverage of forest loss in the translucent pink colour.

Figure 6: Forest road sections that have recovered their forest cover a few years after intervention.



Even the source and technology used by OjoPublico in its report have a level of precision that can only be considered referential, and its use for calculating deforestation or forest loss is questionable, and this would have led the author to make errors in making his estimates. OjoPublico source also considered deforestation in sectors that actually correspond to river beaches within the MADERACRE project area, even in spaces that have in fact always had forest cover and have never experienced a change in use or degradation. These cases can be seen in the images in Figures 7 through 10. What the report erroneously considers deforestation can be seen in transparent pink.

Figure 7: Natural beaches misidentified as forest loss and intact forest wrongly considered as loss of forest cover.



Figure 8: Natural beaches misidentified as forest loss and intact forest mistakenly considered as loss of forest cover



Figure 9: Natural beaches misidentified as forest loss and intact forest mistakenly considered as loss of forest cover



Figure 10: Forest mistakenly considered as loss of forest cover



On the other hand, in the case of Maderacre, all monitoring reports, which include deforestation reports, are audited by an independent international certification body. The certification body's report is also reviewed and ratified according to the international standard Verra. The reported deforestation information is validated by independent third parties.

Therefore, it is **FALSE** that Maderacre has declared less deforestation.

Quote (B):

“The company also noted that in 2020, there was no deforestation within the second project they are promoting, the Madre de Dios Amazon REDD+ Project (which has been operating in concessions owned by Maderacre and Maderera Río Maderyja since 2009), but our analysis identified that at least two hectares of forest were lost that year.”

Original Quote (B) in Spanish:

“La compañía también señaló que, en 2020, no hubo deforestación dentro del segundo proyecto que impulsan, Madre de Dios Amazon REDD+ Project (que opera en concesiones de Maderacre y de la empresa Maderera Río Maderyja desde 2009), pero nuestro análisis identificó que se perdieron al menos dos hectáreas de bosques ese año.”

Our Response:

There was no deforestation nor any activities that impacted the forest ecosystem. We have been able to identify less than 1 ha of forest cover loss according to records from the GFW platform (source also used by OjoPublico), which are due to natural factors. These records show natural tree falls due to probable hurricane-force winds that occasionally occur in the southern Amazon, and which are part of the forest's ecological succession process. We have also been able to identify that they consider the loss of biomass found in the Acre River, whose flow during the rainy season carries away the surrounding biomass and causes it to be lost. The same logic explained in Quote (A) applies, which can be seen in Figures 7 through 10. The Madre de Dios Amazon REDD+ Project has almost 100,000 hectares under forest management and stewardship, so 2 hectares of cover loss due to the factors indicated above (not deforestation) represents 0.00002% of the area.

Therefore, it is **FALSE** that Maderacre has declared less deforestation.

Quote (C):

“Although the Maderacre report does not provide data prior to 2020, OjoPublico found that, in the area where the project is located, approximately 1,300 hectares of primary forest have been lost since 2009. 2015 marked the record for that period: 543 hectares deforested.

Since each of these projects began, this medium's analysis identified that in the Madre de Dios Amazon REDD+ Project, 1,579 hectares of forest were lost; and in the Tahuamanu Amazon REDD+ Project, 1,739 hectares.”

Original quote (C) in Spanish:

“Aunque el informe de Maderacre no proporciona datos previos al 2020, OjoPúblico detectó que, en el área donde se ubica el proyecto, desde el 2009 se perdieron alrededor de 1.300 hectáreas de bosque primario. El 2015 marcó el récord de ese periodo: 543 hectáreas deforestadas.

Desde que comenzó cada uno de estos proyectos, el análisis de este medio identificó que en Madre de Dios Amazon REDD+ Project se perdieron 1.579 hectáreas de bosque; y en Tahuamanu Amazon REDD Project, 1.739 hectáreas.”

Our response:

As mentioned in the responses to Quotes (A) and (B), the author of the article and his specialists are not using the correct definition of deforestation, generating confusion and misinforming their audience. Deforestation involves a change in land use with a permanent loss of the forest. In this case, Maderacre carries out sustainable forest

management, applying a productive conservation model. This model seeks to conserve the forest through responsible management and, from there, generate local development. To date, there are more than 140 direct formal jobs in the Iñapari district and a broad chain of local enterprises promoted by the company. This is a significant contribution in rural jungle regions where informality can reach up to 95%. This productive conservation model maintains 10% of the area as strictly conservation forests, representing approximately 27,000 hectares. In the remaining 90%, under low-impact management, a 30th of the forest is cleared every 30 years, and the remainder is maintained under a natural regeneration process. This allows areas affected by selective logging, secondary roads and yards to regain their forest cover, as seen in Figure 4. In one out of 30 blocks, Maderacre harvests approximately one tree every two hectares. To do this, main roads are maintained, and secondary roads and storage yards are opened temporarily (for one year). Degradation is only equivalent to 0.5% of the area, thanks to which the forest remains healthy. Its structure, composition, dynamics and resilience are maintained, fulfilling its biological and ecosystem functions, and habitats and biodiversity are respected.

This has been demonstrated by independent specialists, such as studies conducted by WWF and the San Diego Zoo, which have shown that the forests we manage in Tahuamanu are home to the second-most-dense jaguar population in the world, surpassed only by the Brazilian Pantanal. This is an indicator of the health of biodiversity and of our forest under sustainable forest management. These independent studies and monitoring have been maintained continuously since 2014. Fernando Angulo, an ornithologist with CORBIDI, conducted a study in 2021 on the composition of birds present in our FMU and demonstrated that the species that make up the bird diversity correspond to that of an untouched forest, demonstrating the health of the forests we manage.

Additionally, forestry operations have been FSC-certified since 2007, the world's leading international standard for proving the legal origin of wood and responsible forest management practices.

Furthermore, Maderacre is ranked Top3 among the 100 most representative forestry companies in the world for its transparency and sustainability policies, according to the Zoological Society of London's SPOTT ranking.

On the other hand, the following images show how the technology and tools used by OjoPublico exaggerate the extent of forest loss caused by the logging roads our operation uses to manage our concession and implement its surveillance system. Note how the pinkish translucent coverage of alleged forest loss substantially exaggerates the width of our logging roads and therefore overestimates the forest loss estimates presented by OjoPublico in its report. This false information is further exacerbated by distorting the concepts of deforestation, temporary degradation, and forest loss, thus misinforming the general public.

Figure 11: Forest roads within the Maderacre concessions.



Figure 12: Forest roads within the Maderacre concessions.



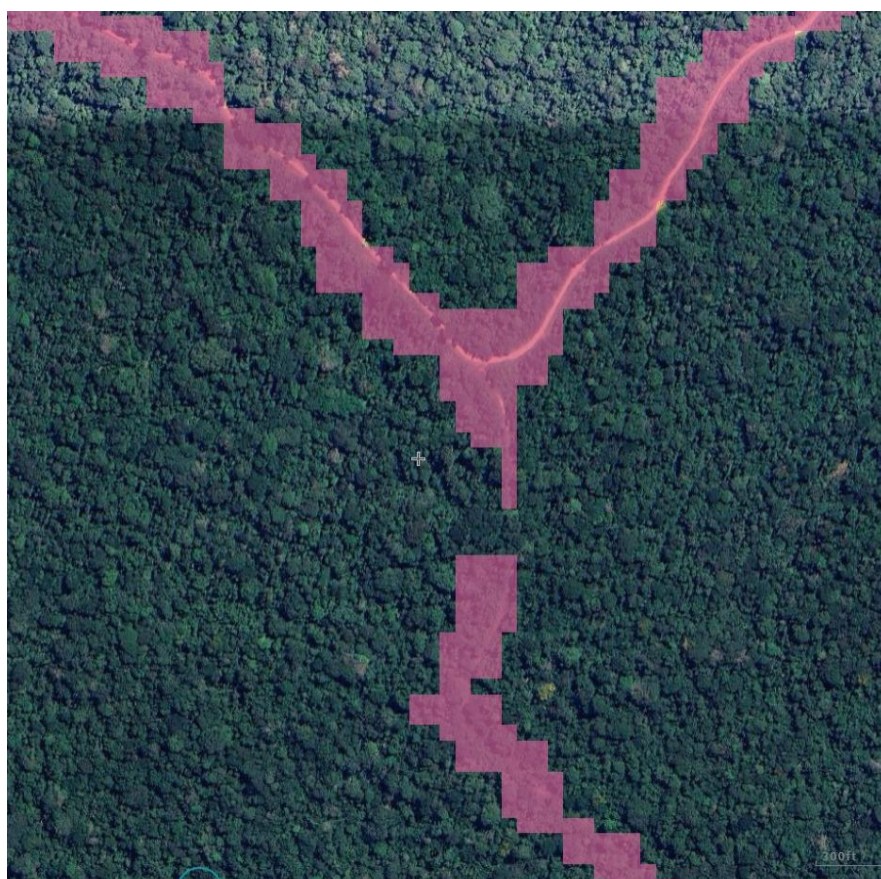
Figure 13: Forest roads within the Maderacre concessions.



Figure 14: Forest roads within the Maderacre concessions.



Figure 15: Forest roads within the Maderacre concessions.



Therefore, it is **FALSE** that Maderacre has declared less deforestation.

Quote (D):

“The Iñapari Amazon REDD+ Project is the third such project led by Erasmo Wong's business group, Corporación Mercantil Recife. Unlike the previous projects, this one is in the development stage for certification; that is, it has not yet marketed carbon credits.

The project is being developed across more than 20,000 hectares of forest located in the Tahuamanu district, also in Madre de Dios. Our team's analysis identified that, in this area, 454 hectares of primary forest have been lost since 2022.”

Original Quote (D) in Spanish:

“Iñapari Amazon REDD+ Project es el tercer proyecto de este tipo dirigido por el grupo comercial de Erasmo Wong, Corporación Mercantil Recife. A diferencia de los anteriores, este se encuentra en etapa de desarrollo para su certificación; es decir, aún no comercializa bonos de carbono.

El proyecto se desarrolla en más de 20.000 hectáreas de bosques ubicados en el distrito de Tahuamanu, también en Madre de Dios. El análisis de nuestro equipo identificó que, en esta área, desde el 2022, se han perdido 454 hectáreas de bosque primario”

Our response:

The project is in the design stage. We have no reported figures. REDD+ projects are protecting forests from surrounding deforestation, with monitoring actions, as well as the development and financing of actions that contribute to narrowing social gaps and

promote preservation of forests, reduce deforestation, and promote the recovery of degraded areas.

Quote (E):

“To resume offering carbon offsets, Maderacre requires the renewal of its Verra-issued certificate.”

Original Quote (E) in Spanish:

“Para volver a ofrecer bonos de carbono, Maderacre requiere la renovación de su certificado emitido por Verra”.

Our response:

Maderacre has an active Verra registration to offer and transfer carbon credits.

Therefore, it is **FALSE** that Maderacre requires the renewal of a certificate issued by Verra to offer carbon credits.

Quote (F):

“Esteban Morales Cama, a REDD+ project specialist on the technical team of the Inter-Ethnic Association for the Development of the Peruvian Rainforest (Aidesep), explained to OjoPúblico that these projects should not result in forest loss. “If there are concessions that involve deforestation, then they are obviously not meeting their objective,” he maintains.”

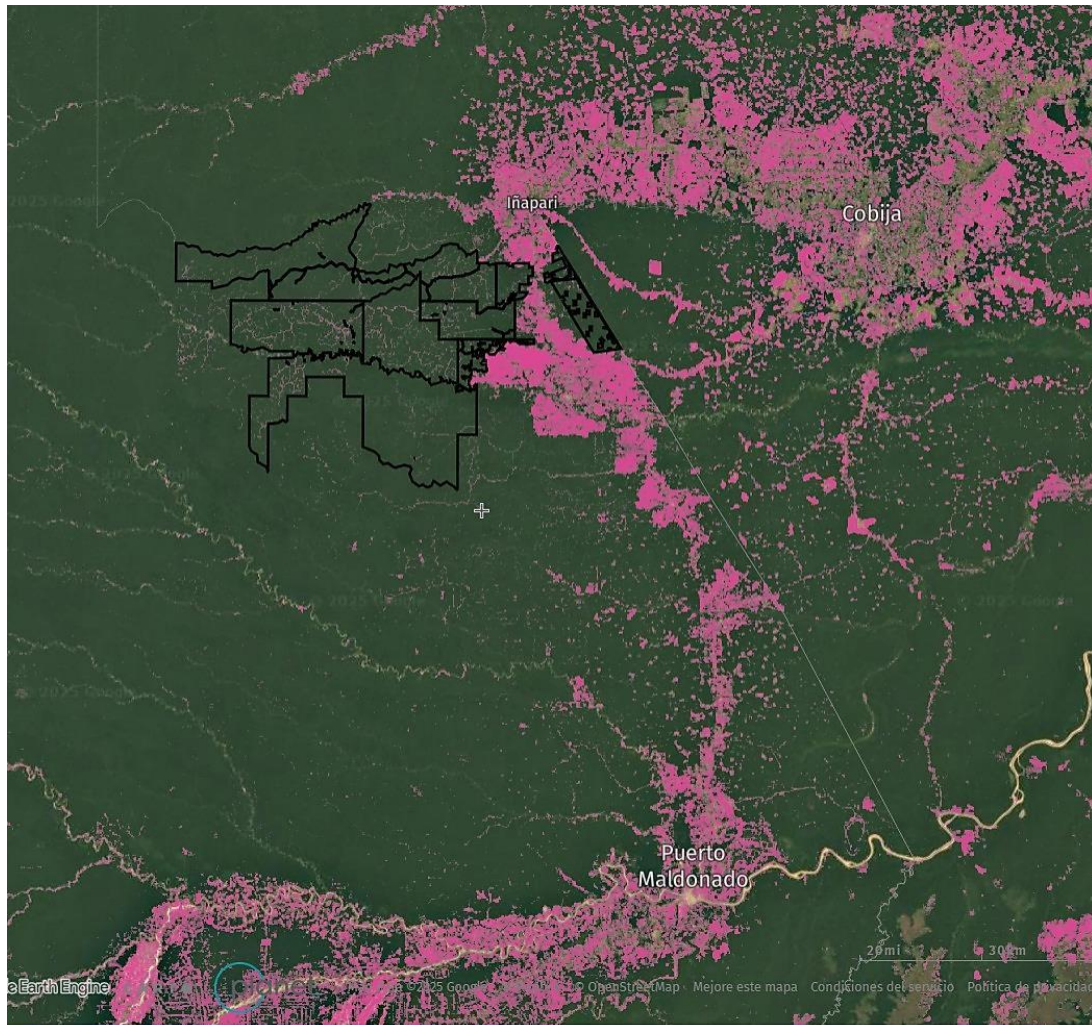
Original Quote (F) in Spanish:

“Esteban Morales Cama, especialista en proyectos REDD+ del equipo técnico de la Asociación Interétnica de Desarrollo de la Selva Peruana (Aidesep), explicó a OjoPúblico que en estos proyectos no deberían presentarse pérdidas de bosques. “Si hay concesiones que tienen deforestación, entonces obviamente no están cumpliendo su objetivo”, sostiene”.

Our response:

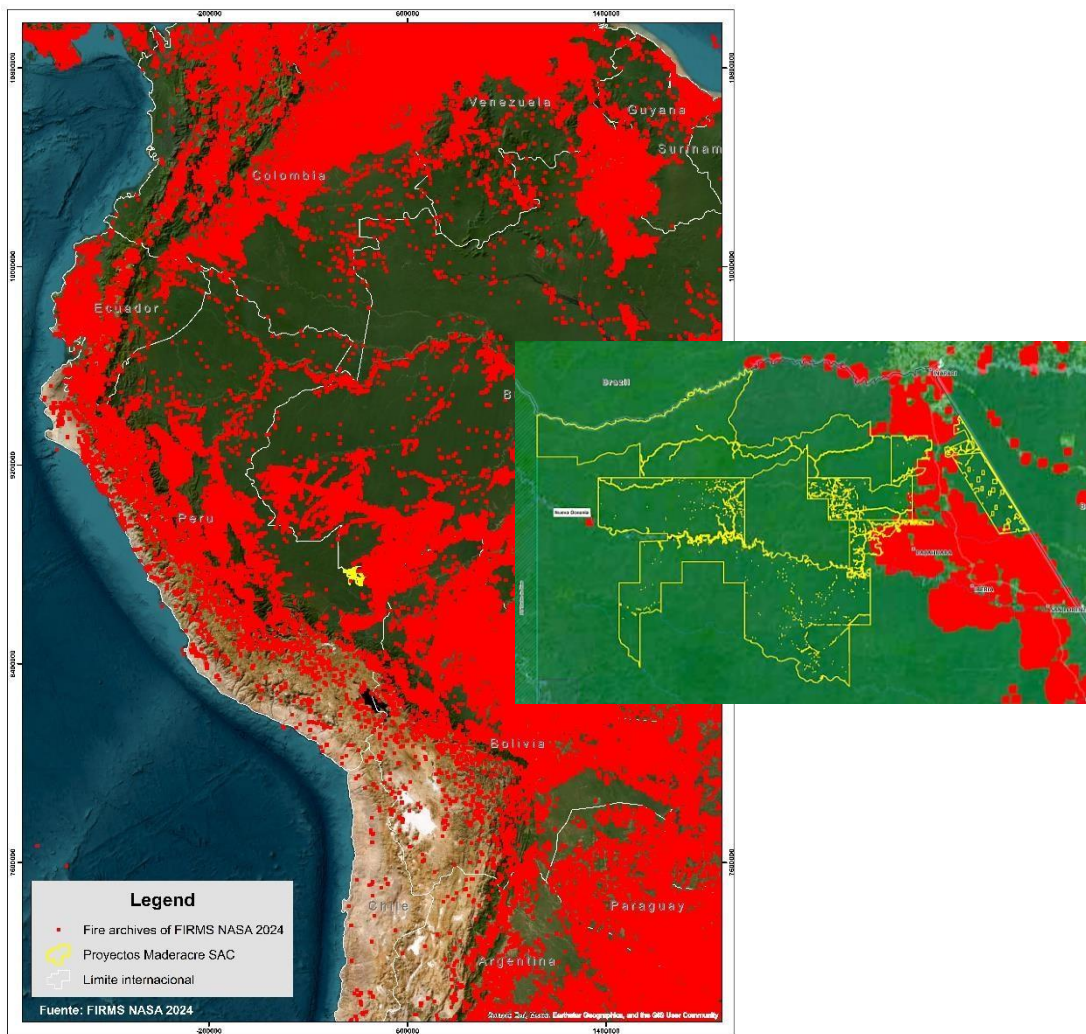
Maderacre's REDD+ projects have been successful in reducing the advance of deforestation in the province of Tahuamanu, Madre de Dios. Figure 16 shows the deforestation that occurred between 2001 (prior to the granting of Maderacre's first concession) and 2024 in pink. This shows the progress of deforestation in the region and on the Brazilian and Bolivian sides of the border. The map clearly shows how Maderacre's forest concessions have been able to reduce the advance of deforestation with its productive conservation model. Maderacre has 13 operational checkpoints and conducts annual river and land patrols, covering an average of 1,800 kilometers of annual patrols.

Figure 16: Forest loss in the years 2001-2024 in the Madre de Dios region, Acre (Brazil) and Pando (Bolivia).



Beyond deforestation, Maderacre has also served as a shield against the uncontrolled forest wildfires of 2024 in the Amazon. Figure 17 shows the record of forest wildfires that occurred in 2024, throughout Peru and neighboring countries. Outlined in yellow, Maderacre's forest concessions can be seen. Zooming in on that area, you can more clearly see how the fire reached the border of our concessions, but our actions stopped it. Patrols also allow us to take immediate action to stop any further fire spread, illegal logging, poaching, and illegal forest occupation. We are the only forestry operation in Peru that has invested in the development of 130 km of firebreaks in the areas directly adjacent to our FMU and the private properties where the fires originate. This level of investment can be done due to the revenue coming from the sale of carbon credits.

Figure 17: Forest wildfire maps 2024 in Peru, according to NASA FIRMS.



Therefore, it is FALSE that Maderacre's carbon projects have not met their objective.

Quote (G):

“The expert (Esteban Morales Cama) says that the loss of forest in concessions could correspond only to “forest camps” or “trails for extracting wood” which are “very small facilities”, but should not represent more than 20 hectares.”

Original Quote (G) in Spanish:

“El experto (Esteban Morales Cama) dice que la pérdida de bosque en concesiones podría corresponder solo a “campamentos forestales” o “trochas para sacar madera” que son “instalaciones muy pequeñas”, pero no deberían representar más de 20 hectáreas.

Our response:

The 20 hectares of forest loss mentioned above, would be equivalent to a primary forest road of 14 km long. To take care of a 270,000-hectare FMU, the main road to reach the farthest border is around 160 km long. And this doesn't include yards, guard posts, and camps, among others. The figure is inconsistent.

Therefore, it is FALSE that forest infrastructure should not represent more than 20

hectares.

Quote (H):

“In the OjoPublico questionnaire sent to Maderacre, it was asked about the reasons for the reduction of its capital, considering the sales of carbon credits recorded in recent years and the possible effects of the money laundering process that the firm is facing on carbon projects and their buyers.”

Original Quote (H) in Spanish:

“En el cuestionario de OjoPúblico enviado a Maderacre, se le preguntó sobre los motivos en la caída de su capital teniendo en cuenta las ventas de bonos de carbono registradas en los últimos años y posibles efectos del proceso de lavado de activos que enfrenta la firma en los proyectos de carbono y sus compradores”.

Our response:

Maderacre's capital has experienced solid growth, increasing by 82% between 2011 and 2025. This sustained investment in the Madre de Dios region has not only generated formal jobs but also promoted sustainable practices in a region where economic informality exceeds 95% in rural areas.

Within the framework of a corporate reorganization process, the company carried out a nominal capital reduction by redeeming two (2) shares with a nominal value of S/1.00 each (equivalent to less than \$0.30 each). This does not affect the company's financial health.

We categorically reject any association with illegal activities. Maderacre is not, nor has it ever been, involved in any money laundering investigation. Legality and transparency are pillars of our operations and our commitment.

Quote (I):

“Maderacre and Maderyja are linked to fiscal investigations for alleged money laundering and organized crime involving timber trafficking.”

Original Quote (I) in Spanish:

“Maderacre y Maderyja están vinculadas a investigaciones fiscales por los presuntos delitos de lavado de activos y crimen organizado por tráfico de madera.”

Our response:

Maderacre does not maintain any operational or corporate relationship with Maderyja SAC. The only relationship between the two companies is the legal acquisition of the rights to a forestry concession that Maderacre carried out in 2022. This operation, carried out through a transfer of contractual position, was fully endorsed by the competent authorities, including OSINFOR and the Regional Government of Madre de Dios.

Until the transfer, Maderyja SAC's concession, as part of the Madre de Dios Amazon REDD+ project, implemented actions in its area to prevent deforestation. These activities have been verified and certified by an international certification body and according to the Verra standard. To date, Maderyja SAC is no longer part of the Madre de Dios Amazon REDD+ project, as it has transferred the concession, which is part of the project, to MADERACRE.

Finally, we refute the accusations linking Maderacre to tax investigations for alleged money laundering and organized crime involving timber trafficking. Maderacre is not

subject to any investigation for these crimes.

Quote (J):

“Erasmus Wong Lu Vega, general manager of Maderacre, faces an investigation for the alleged crime of money laundering.”

Original Quote (J) in Spanish:

“Erasmus Wong Lu Vega, gerente general de Maderacre, enfrenta una investigación por el presunto delito de lavado de activos.”

Our response

The money laundering investigation against Mr. Erasmus Wong Lu has been seriously compromised due to serious procedural flaws and inconsistencies. Despite a judge ordering the investigation to be closed in April 2023, the Prosecutor's Office continued to collect evidence outside the established legal deadlines.

The main anomalies that weaken the viability of the case are:

- **Expert Contradiction:** The Prosecutor's Office's own experts contradicted the thesis of the equity imbalance by confirming that Erasmus Wong Lu's finances actually reflected a surplus.
- **Absence of Crime Source:** The Prosecutor's Office failed to identify a prior crime that generated the allegedly illicit funds, which weakened the basis of the accusation. Furthermore, the Public Prosecutor's Office ruled out the existence of a tax crime.
- **Withdrawal of the Charge for Criminal Organization:** The Public Ministry admitted that he did not have sufficient evidence to prove the existence of a criminal organization.

The case has now been referred to the Ninth Preliminary Investigation Court, and the serious flaws in the investigation seriously call into question the viability of the case.

Quote (K):

“In 2023, a group of people from the Iberia district (Madre de Dios) accused Erasmus Wong, on Exitosa radio, of appropriating a forest concession in a national reserve for logging purposes. Maderacre, in a statement published on its website, indicated that the information was false and that it was a transfer to Corporación Mercantil Recife that “has not yet been completed.”

Original Quote (K) in Spanish:

“En 2023, un grupo de personas del distrito de Iberia (Madre de Dios) acusó, en radio Exitosa, a Erasmus Wong de apropiarse de una concesión forestal en una reserva nacional para la actividad maderera. Maderacre, en un comunicado publicado en su página, indicó que la información era falsa y que se trataba de una transferencia a favor de Corporación Mercantil Recife que todavía “no se ha completado”.

Our response

The forest conservation concession was legally acquired by Corporación Mercantil Recife SAC, with the sole purpose of preserving the ecosystem and developing an ecosystem services project.

- **No logging:** No company of the E. Wong Corporation, including Maderera Rio Acre SAC, has logged trees in this area.

- **Protection activities:** The only activities carried out by Corporación Mercantil Recife SAC have been protection activities, focused on preventing illegal invasions by building checkpoints, installing signs, and patrolling the area.
- **Inspection results:** A police inspection, carried out from the 12th to the 15th of December 2023, concluded that there is no evidence of productive activities in the forest conservation concession.

You can access the full response here:
<https://maderacre.com/assets/files/Response-towebnews.pdf>

In conclusion, it is false that Maderacre or any company within the E. Wong Corporation is attempting to illegally appropriate a conservation concession or intends to use it for logging activities.

Quote (L):

"OSINFOR, through its press department, informed OjoPúblico that there are currently no specific regulations governing the carbon offset market. When asked what happens to logging companies that also generate income from the carbon offset market and whether this information should be included in Forest Management Plans, they suggested contacting the National Forest Service (SERFOR)."

Original Quote (L) in Spanish:

"El Osinfor, a través de su área de prensa, señaló a OjoPúblico que hoy no existe una normativa específica para regular el mercado de bonos de carbono. Al ser consultados sobre qué ocurre con las compañías madereras que también generan ingresos por el mercado de bonos de carbono y si esta información debería ser consignada en los Planes de Manejo Forestal, sugirieron contactar al Servicio Nacional Forestal (SERFOR)".

Our response

The Forestry and Wildlife Law grants the right to include ecosystem services in the forest management, including carbon offsets, within the framework of forest concession contracts.

To this end, Maderacre has included the development of ecosystem service projects as part of the objectives of its General Forest Management Plan (GFMP). This plan has been approved by the Regional Forestry Authority of the Madre de Dios Regional Government and audited by OSINFOR.

Quote (M):

"From the tax perspective, there's also no certainty about the obligations of companies engaged in this sector. To date, there's no requirement for companies to report to the National Tax Authority (SUNAT) that their activities include carbon offsets."

Original Quote (M) in Spanish:

"Desde el lado tributario, tampoco hay certezas sobre las obligaciones de las empresas dedicadas a este rubro. A la fecha no hay una exigencia para que las compañías reporten a la Sunat que entre sus actividades también se desempeñan en el mercado de bonos de carbono"

Our response

Maderacre reports all of its sales to the tax Authority (SUNAT), including transactions related to the sale of carbon credits.

We strictly comply with all current regulations in the country, which ensures the legality and transparency of our operations.

In addition to national regulations, our operations are backed by international certifications that demonstrate our commitment to the highest standards of quality and sustainability.

Maderacre is up to date with its annual payments for the right to use its concessions.