

Submitted to: Verra

Project under public consultation: Reforestation Grouped Project at Pratigi Environmental Protection Area (ID 1317)

Public consultation response

Reforestation Grouped Project at Pratigi Environmental Protection Area (ID 1317)

[The Nature-based Solutions Brazil Alliance](#) aims to promote and stimulate an agenda to discourage deforestation and forest degradation through the creation of guidelines and good practices, generating a safe and reliable business environment. The NBS Brazil Alliance appreciates this opportunity to share input on the Reforestation Grouped Project at Pratigi Environmental Protection Area (ID 1317). The open consultation process and the possibility to participate actively is an opportunity to improve the integrity of the carbon credits.

As a non-profit association of project developers whose members are: Agrocortex, Bioassets, Biofilica, Biofix, BR Carbon, BVRio, Carbon Credits Consulting, Carbonext, Centro de Estudos Rioterra, Ecosecurities, ERA Brazil, FAS, IDESAM, Impact Earth, Instituto Ekos Brasil, MyCarbon, Permian Brasil, Radicle, South Pole, Sustainable Carbon and Volkswagen Climate-Partner, it is great to see new carbon projects being developed.

The following aspects contained within the Project Description were seen as concerns:

Methodology and Baseline

The most relevant point of the analysis is found here. It would be interesting for them to present a little more detail about the additionality of the project.

It is possible that this has been more detailed in previous stages of the validation and verification process, however with the addition of the new areas (PA2), it would be interesting to present a new detailed and updated analysis. They say that the evaluation of the baseline and additionality tools must follow the same pattern as that presented in the already validated document of the Grouped Project, however the result was not presented in this report. It would be interesting and important to have this record in this document.

Ownership and Project Proponents

There is a clear and well-established agreement that grants the right to sales and the proceeds from the sales of credits. There are both private areas and settlements in the projects, and both types have the right to use the resources in their areas guaranteed.

However, the evidence to support these arguments is only available to auditors and cannot actually be verified in the public consultation process. It is also not clear in the project who gets the carbon credits and who has the right to trade them.



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The NBS Brazil Alliance appreciates this important opportunity to record our comments. We welcome the project proponents to reach-out directly with any questions or follow-up requests related to the comments shared above by contacting **NBS Brazil Alliance Coordinator, Victor Ferraz**, at **nbs@nbsbrazilalliance.com**.
