

Submitted to: Verra

Project under public consultation: THE ENVIRA AMAZONIA PROJECT (ID 1382)

## Public consultation response

### THE ENVIRA AMAZONIA PROJECT

[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 Arca REDD+ Project. 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, Biofillica, BR Carbon, BVRio, Carbonext, Ecosecurities, ERA Brazil, FAS, IDESAM, Instituto Ekos Brasil, Mirova Natural Capital – Althelia Funds, Permian and South Pole, it is great to see new carbon projects being developed.

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

#### Baseline

The project's baseline is not plausible. Based on observed deforestation in proxy areas and property boundaries, the PP sets an annual deforestation rate of 16% and projects the planned deforestation of more than 30,000 hectares in the first year of the project's life alone. Furthermore, it later assumes (arbitrarily and "conservatively") deforestation of 8,000 ha for the first 4 years.

There are a number of problematic issues with this approach: (i) The PP does not present or reference suppression permits issued by Imac (Environment Institute of Acre) for the project area. (ii) The PP infers that the monitored deforestation in the proxy areas is planned (legally sanctioned by the environmental agency) without presenting evidence to support this assertion (suppression permits for the proxy areas) and (iii) deforestation above one thousand hectares requires EIA RIMA (Environmental Impact Study and Environmental Impact Report) to be approved in the state. These documents were not referenced or presented.

In addition it is important to note that one of the agents of deforestation was identified as one of the proponents of the project, JR Agropecuária e Empreendimentos EIRELI. The company was created in 2009 with the plan to clear 20% of the Envira Amazônia Property, harvesting all the commercially valuable timber and then deforesting the land to establish a large ranch.

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## Free, Prior and Informed Consent (CCB)

The landowner, who is also a project proponent, is the full owner of the project area and has full resource access/use rights, which are not shared with anyone. The property was georeferenced and officially registered in the Rural Environmental Registry, a process that involved on-the-ground assessment of all property boundaries and consultation with neighboring landowners and resolution of any existing boundary disputes. There is a FPIC process described in documentation, although this analysis is not sufficient to conclude anything about its sufficiency and compliance to the CCB standard.

## Safeguards

The project applies to the gold level in communities and for this it should show a functional and effective benefit sharing mechanism. This is not done. What you find in the Monitoring Report is a transcript of the Project Description section.

## Other Comments

It is not clear from the project profile on the Verra website what the current verification scope is and what document is in the public consultation process. Apparently, the last period of monitoring and verification was from 2016 to 2018 (for this one there are already representation documents, the audit process is finished). We could not find any monitoring reports covering the period 2019 to 2021, either for the VCS standard or for the CCB standard.

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](mailto:nbs@nbsbrazilalliance.com).

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