

Submitted to: Verra

Project under public consultation: Floresta Verde REDD+ Project (ID1953)

Public consultation response

CCB Verification| Floresta Verde REDD+ 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, Biofilica, BR Carbon, BVRio, Carbonext, Ecosecurities, ERA Brazil, FAS, IDESAM, Instituto Ekos Brasil, Mirova Natural Capital – Althelia Funds, Permian, South Pole, Sustainable Carbon, Radicle 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:

Consistency between what is proposed in the DP and what is presented in the present RM

Overall, it is possible to notice a coherence between what was proposed during the validation process and what it is being presented in this monitoring report. Some specific (and critic) points of doubts are presented below:

1. It should be interesting to **provide an explanation on why the baseline GHG emission, presented on table 6 of this MR, is different from the baseline GHG emission presented in the Table on page 175 of the PD.** Considering that the present monitoring is under the same baseline as presented in the PD (under 6 years, so no revalidation needed) it should have equal values.
 2. When assessing the leakage in the current monitoring, it was important to check it on the PD. **It should be interesting to justify why the leakage value in the Project Description is considered zero, since considering VM0015 leakage cannot be considered zero in the baseline scenario.**
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Project Description and Methodology Deviations

1. Change of name from ARC REDD+ Project to Floresta Verde REDD+ Project is presented as PD deviation. However, no detail is provided about this change. Are there any implications of this change to the project?
2. It is not listed as project deviation, however there was a change in the Project Proponent from the PD (Amazon Reforestation Consortium) to the second MR (Floresta Verde Serviços Ltda). More details should be given to assess if there is any implication of this change to the relationship of the local stakeholder with REDD+ Project (employability, communication...).
3. It is not listed as project deviation, however, it should be provided an explanation why the landowner (Transportadora Floresta do Araguaia Ltda.) listed in the PD as Other Entities Involved in the Project is not listed in this MR anymore.

Social Activities

1. It is not quite clear how often the Informational Meetings with Stakeholders (2.3.3) happened. It could be interesting to present the dates where the meetings with local stakeholders that do not work in the farm were held.
2. In 2.3.14 it is said that most jobs created by the project are related to planting trees. However, reforestation is not included as a Project Activity. More detail should be given to better explain the correlation between the Project Activities and its employability.

Biodiversity Activities

Regarding the biodiversity activities, it is said that the biodiversity monitoring is implemented as part of the regular patrolling conducted by the patrol staff. It is important to assess if these measures are enough to provide an overview of the local biodiversity and the project impacts over it, especially considering it has a CCB standard. It may be important to carry a proper fauna and flora inventory to assess the presence of endangered species, key species and overall local biodiversity.

Monitored Parameters

Regarding the monitored parameters, the ones presented in the PD were monitored in the MR02 as expected. However, there is an incoherence with the values presented under the item 'Number of Verified Carbon Units (VCUs) to be made available for trade at time t' (997,614; 1,163,611; 1,142,927) and the final numbers of tradable VCUs presented at Table 6 (150,367; 269,688; 313,087)

Other Comments

1. On item 5.0.3 it is found "*such patrols which have been on-going since project start date of 2009 onwards* ' ', however the project Start Date is January 2016.
2. It should be interesting to provide the website where information about the project are being published (As said in the MR)

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.
