

Submitted to: Verra

Project under public consultation: Floresta Verde REDD+ Project (project ID 1953)

Public consultation response

Floresta Verde REDD+ Project (project ID 1953)

[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 Floresta Verde 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, Biofílica, Biofix, BR Carbon, BVRio, Carbon Credits Consulting, Carbonext,, Conservação Internacional Brasil, Ecoscurities, ERA Brazil, FAS, IDESAM, Impact Earth, Instituto Ekos Brasil, MyCarbon, Permian Brasil, Radicle, Rioterra, South Pole, Sustainable Carbon and Volkswagen Climate-Partner, it is great to see new carbon projects being developed.

The NBS Brazil Alliance submitted comments at the PDD and MR public consultation in August 2022, and the comments in this document are intended to verify that the contributions made at that time were met. The following aspects contained within the “MR draft ARC 2019 to 2022_ProofRead_finalv4.pdf” were seen as concerns:

Methodology and Baseline

Comment submitted on 8/4/2022 by NBS Brazil Alliance:

1. 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.

The document MR brings the reason why leakage is considered zero:

“The reason the Leakage is Zero is because there are 450 staff that live in the community of the Leakage Monitoring Area, and these 450 staff have families with over 2,000 members, via training programs and requests these people would normally be drives of destruction in these leakage area, however they are not, as they have jobs, and with jobs they are not driven into extractive activities”.

However, other aspects to consider leakage could be analyzed and evaluated, in addition to the explained reason. Methodology VM0015 allows considering zero leakage in certain cases, as explained in section 9.2 Calculation of ex-ante estimation of total net GHG emissions reductions of Methodology VM0015.

Ownership and Project Proponents

Comment submitted on 8/4/2022 by NBS Brazil Alliance:

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.

In the previous comment sent by Aliança NBS Brasil, on 08/04/2022, it was noted that section 2.2.4 Project Description Deviations of the original MR document did not indicate the implications of the name change that the project underwent. However, in the current version of the MR, the project brings the implications of this change in section 2.2.4 Project Description Deviations, especially for credit buyers, and also explained the reason for the change due to the change of proponent and entities involved.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

Comment submitted on 8/4/2022 by NBS Brazil Alliance:

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.

In the current MR, information was added on the frequency of meetings with stakeholders, but no dates or evidence that these meetings took place were included. It could have been indicated that evidence of minutes of these meetings was presented to the audit and is available, for example.

There was no feedback or update on the following comment submitted by NBS Brazil Alliance:

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.

The updated version of the MR did not mention the relationship between “planting trees” activities and project activities.

Other Comments

Comment submitted on 8/4/2022 by NBS Brazil Alliance:

Biodiversity Activities

1. 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.

The Biodiversity 5.0.2 Mitigation Actions section of the MR presents a Fauna and Flora monitoring report for the CCB.

Comment submitted on 8/4/2022 by NBS Brazil Alliance:

Monitored Parameters

1. Regarding the monitored parameters, the ones presented in the PD where 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 tradables VCUs presented at at Table 6 (150,367; 269,688; 313,087)

The MR presents new numbers in Table 6, but it is not possible to assess why there was a difference between one MR and another.

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.