

Submitted to: Verra

Project under public consultation: 413 REDD PROJECT (2586)

Public consultation response

413 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 413 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, Ecosecurities, 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 following aspects contained within the Project Description were seen as concerns:

Methodology and Baseline

The additionality of this APD project is based on the recurrent conversion of forest into pasture for livestock and the sale of wood. This conversion is being guided by the Brazilian Forestry Code, where the landowner can suppress the Legal Reserve surplus. In the case of the property in question, located in the Legal Amazon, up to 20% of the total area of the property can be removed, provided that it has the vegetation suppression license (LSV) approved. The process for obtaining this environmental license is still open, that is, the removal of vegetation has not yet been approved:

Informações do Processo	
Processo : 01.01.030201.002026/2021-82	Situação : Aberto
Assunto : 1330 - SOLICITAÇÃO DE LICENÇA AMBIENTAL	
Órgão/Entidade : IPAAM - INSTITUTO DE PROTEÇÃO AMBIENTAL DO AMAZONAS	

Interessado	
CPF : 016.232.028-09	Interessado : LUIZ ERNESTO PEREIRA DOS SANTOS

Data	Setor	Evento
23/06/2022	GCAP	239 - NOTIFICAÇÃO AO CONTRIBUINTE - PROTOCOLO VIRTUAL
15/03/2022	GCAP	59 - TRAMITANDO
27/02/2022	G700573	50 - CONHECIMENTO E PROVIDÊNCIAS, NOS TERMOS DO DESPACHO ANEXO
02/12/2021	GCAP	59 - TRAMITANDO
30/11/2021	G005803	50 - CONHECIMENTO E PROVIDÊNCIAS, NOS TERMOS DO DESPACHO ANEXO
25/11/2021	GCAP	245 - PARA ANÁLISE E PROVIDÊNCIAS
25/11/2021	G103142	245 - PARA ANÁLISE E PROVIDÊNCIAS
25/11/2021	GEPR	129 - REGISTRO NA CENTRAL DE ATENDIMENTO

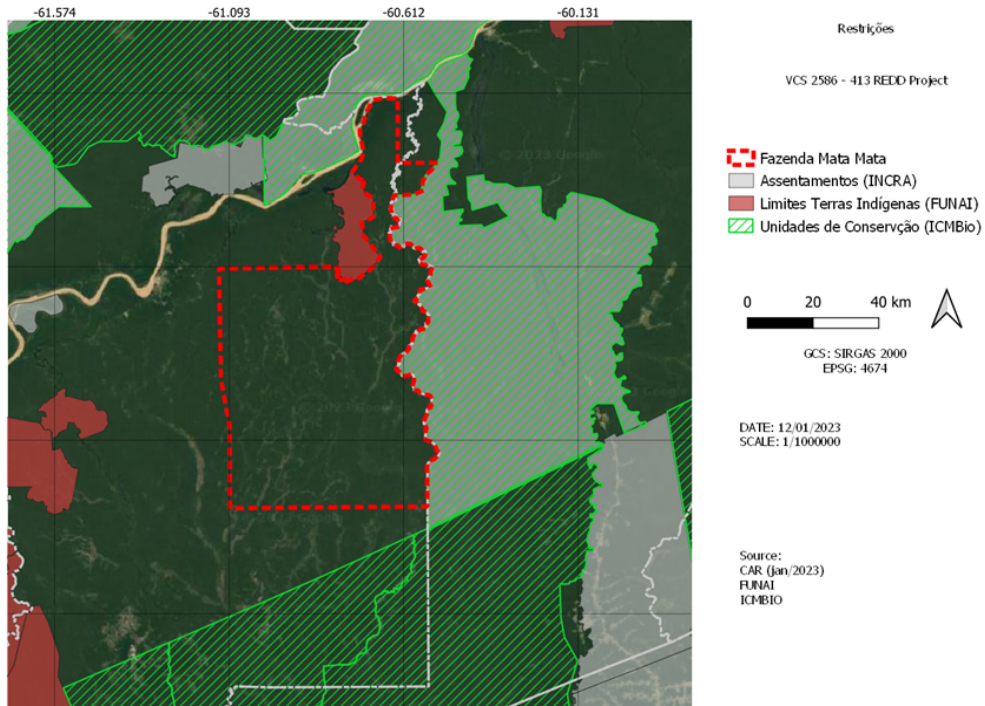
One of the items that is requested as a “Basic Requirement” for the vegetation suppression license by IPAAM (Amazon Environmental Protection Institute) is the receipt of the CAR (Rural Environmental Registry). The situation of the property in relation to the CAR will be explained in the section “Ownership and Project Proponents”.

For this APD (Avoiding Planned Deforestation) project, 10 proxy areas were chosen, but areas significantly smaller than the project property (496,342 ha). It is recommended to use larger areas, such as the project, so that the reality of the region is more accurately portrayed. The use of a sum of small areas can inflate the deforestation rate.

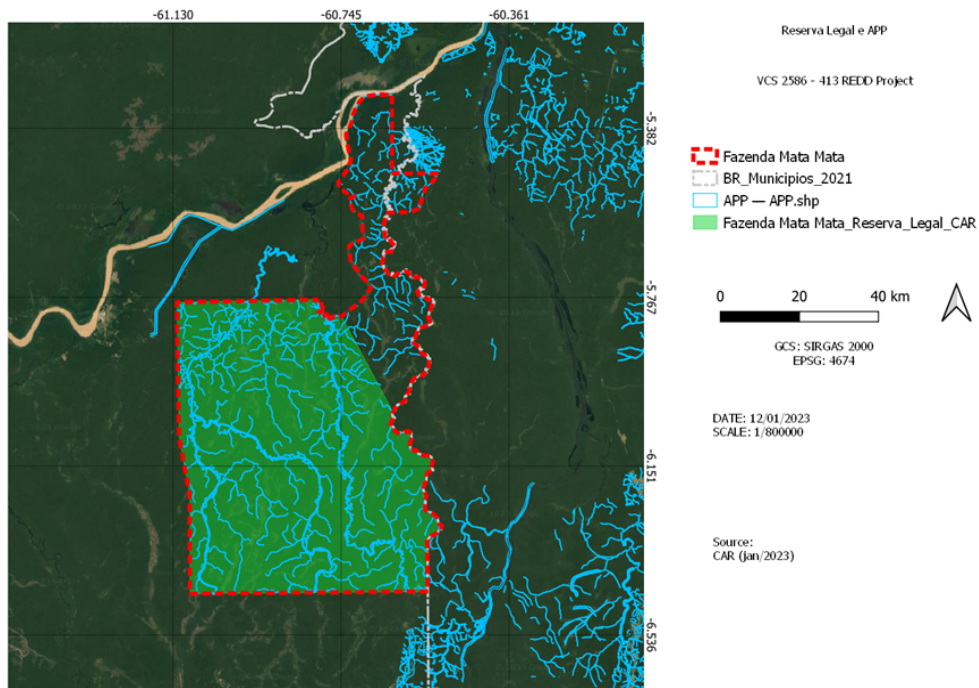
Proxy ID	Total Forest Area (ha)	Net Forest Area (ha)	Total Def (ha)	% Def	Years of Def	%Def/yr
P_1	13,615	12,932	2,736	21.2%	10	2.1%
P_4	61,270	59,796	17,282	28.9%	10	2.9%
P_5	32,771	32,114	2,206	6.9%	9	0.8%
P_6	32,784	31,680	5,910	18.7%	9	2.1%
P_8	118,477	118,468	35	0.0%	1	0.0%
P_9	19,970	19,735	2,761	14.0%	10	1.4%
P_10	17,575	16,386	4,910	30.0%	10	3.0%

Ownership and Project Proponents

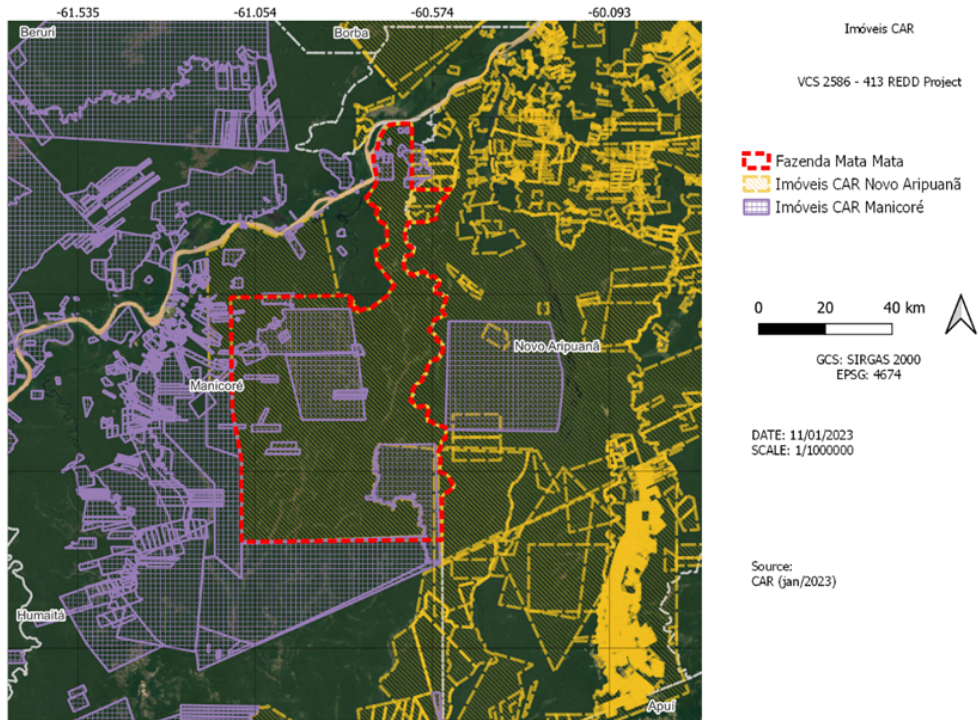
Ownership of the land is given to Luiz Ernesto Pereira Taranto through land regularization carried out at the Registry Office of the municipality of Novo Aripuanã, as presented by the project. In spatial analysis, the project property does not intersect with settlements, Conservation Units, Indigenous Lands and Quilombolas. They only share boundaries with these protected areas as shown in the map below:



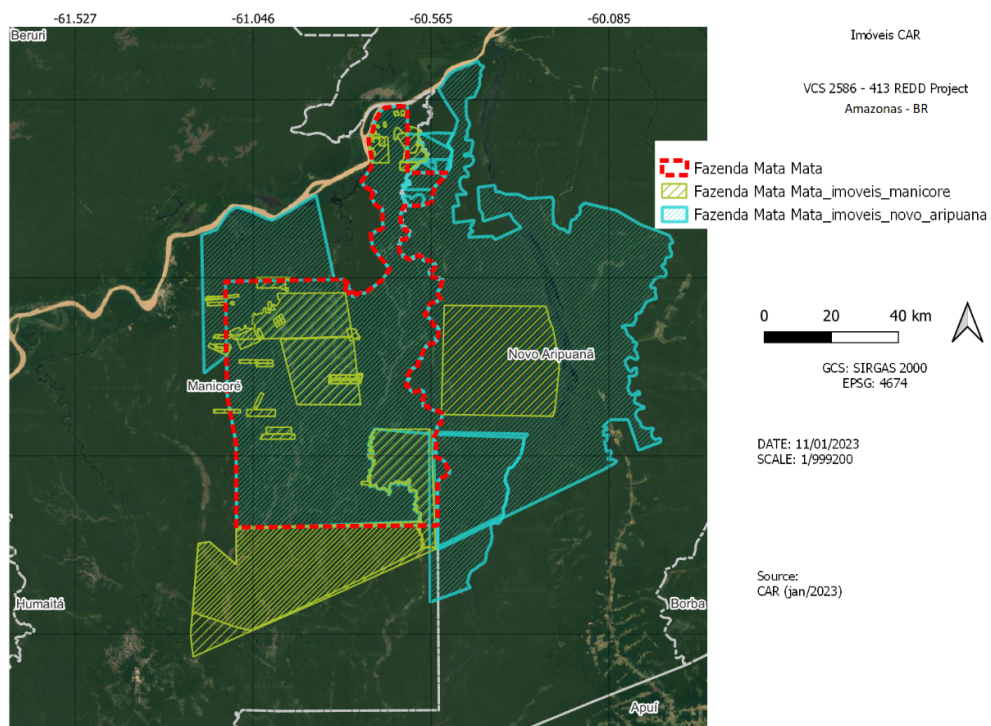
Below we have the representation of self-declared CAR data referring to the Legal Reserve and APP (Permanent Preservation Area) present on the property. The Legal Reserve Area corresponds to the 80% required by law, as shown in the map below.



CAR Analysis: The following figure shows the layout of the CAR (Rural Environmental Registry) properties close to the Mata Mata I Farm polygon used in the 413 REDD Project of December 13, 2022:




The next figure illustrates the CAR of properties in the municipalities of Novo Aripuanã-AM and Manicoré-AM that intersect with the polygon of the property under study:



As seen on the map, there are several overlapping properties registered with the CAR, showing the following number of intersections, totaling 65 intersections of other properties.

City	CAR properties with polygonal intersection Mata Mata I
Manicoré	55
Novo Aripuanã	10
TOTAL	65

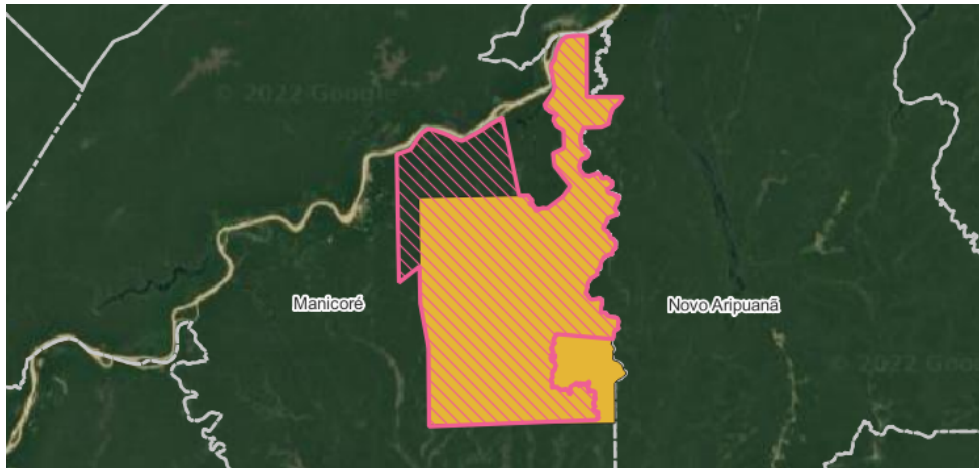
The limit with geometric and area equity present in the project under analysis is represented by the CAR code **AM-1303304-8BB9.A244.F3C6.4D17.9341.4B90.65A7.F896**, which presents the following registered information:

CAR code	AM-1303304-8BB9.A244.F3C6.4D17.9341.4B90.65A7.F896	
Polygonal		
Registration	Suspended	
Condition	Analyzed with pendencies, awaiting rectification and/or presentation of documents	
Date of registration in SiCAR:	09/28/2019	
CAR analysis date:	11/30/2021	
Date of last rectification:	08/21/2020	
Property area	501,355.94	
Native vegetation	98,963.51	19.74%
Proposed Legal Reserve	401,964.55	80.18%
Situation	Not analyzed	
APP	11,937.50	2.38%
APP in consolidated area	2,429.57	0.48%
APP in native vegetation	2,429.57	0.48%
Embargoed area overlap	0.005	0.00%
Indigenous land	28.9333	0.01%
Infraction: cutting or turning hardwood into charcoal.	-	



As noted in the table above, the property rectified in August 2020 has its registration suspended on condition that it is analyzed with pending issues, awaiting rectification and/or

presentation of documents. An erroneously presented point is the amount of Native Vegetation (98,963.51 ha) that would occupy 19.74% of the size of the property.

Another point of alert in relation to the CAR refers to the possible conflict of another registered property (AM-1303304-2FF3.9DE4.AB1F.4EF9.9C58.CD84.7560.A6F4) which has a great overlap with the property under study and contemplates the REDD project area in the northern portion of the site:



Below is a comparative table of the two properties registered in the CAR:

CAR code	AM-1303304-8BB9.A2 44.F3C6.4D17.9341.4B 90.65A7.F896	AM-1303304-2FF3.9D E4.AB1F.4EF9.9C58.C D84.7560.A6F4
Polygonal		
Final code	F896	A6F4
Registration	Suspended	Suspended
Condition	Analyzed with pendencies, awaiting rectification and/or presentation of documents	Awaiting analysis, not subject to data revision
Date of registration in SiCAR:	09/28/2019	04/24/2020
CAR analysis date:	11/30/2021	02/16/2022
Date of last rectification:	08/21/2020	07/07/2021

Property area	501,355.94		549,826.32	
Native vegetation	98,963.51	19.74%	545,132.14	99.15%
Proposed Legal Reserve	401,964.55	80.18%	441,315.52	80.26%
Situation	Not analyzed		Not analyzed	
APP	11,937.50	2.38%	8,730.83	1.59%
APP in consolidated area	2,429.57	0.48%	8,635.58	1.57%
APP in native vegetation	2,429.57	0.48%	8,635.58	1.57%
Embargoed area overlap	0.005	0.00%	0.005	0.000%
Indigenous land	28.9333	0.01%	0	0.000%
Infraction: cutting or turning hardwood into charcoal.	-		3.1273	0.001%

There is a conflict regarding the dates, in which the final property A6F4 was registered and rectified after the property F896 used in the project. It is noteworthy that the analysis of the CAR was also carried out later (02/16/2022), 10 months after the publication of the REDD+ project document.

The proportion of native vegetation on the property is more coherent in the property A6F4 covering 99.15% of the total area. Briefly analyzing the Property Chain Certificate (Appendix 1), the area in the document (549,495.1868 ha) is different from that described in the project's PD (496,342 ha).

The project has a governance structure, as described in Appendix 2, but there are not many details about how the local governance of the property will be to ensure its conservation. Also, it is not clear in the project who will commercialize the credits, it being understood that it will be the proponent (413 Environmental, LCC).

Local Stakeholder Consultation and AFOLU-Specific Safeguards

Three Public Consultations related to the project were documented: Novo Aripuanã-AM, Manaus-AM and Rio Maripaua-AM, respectively. All local public consultations were monitored by FAS (Sustainable Amazon Foundation), according to the documentation in Appendix 3.

As the table below shows, 82.41% of the project credits are estimated to be issued in the first 10 years of the project, which raises concerns about the permanence of the project for the next 20 years, as a cash flow to maintain all the actions that are promised in PD for the 30 years of the project.

Year	Estimated GHG reductions or removals (tCO ₂ e)	emission % per emission
2021	3,123,313	7.10%
2022	3,236,221	7.36%
2023	3,346,986	7.61%
2024	3,457,750	7.86%
2025	3,568,515	8.12%
2026	3,679,279	8.37%
2027	3,790,044	8.62%
2028	3,900,808	8.87%
2029	4,011,573	9.12%
2030	4,122,337	9.37%
2031	2,500,973	5.69%
2032	954,002	2.17%
2033	85,066	0.19%
2034	747,318	1.70%
2035	643,976	1.46%
2036	540,634	1.23%
2037	437,291	0.99%
2038	333,949	0.76%
2039	230,607	0.52%
2040	127,265	0.29%
2041	70,358	0.16%
2042	62,936	0.14%
2043	55,513	0.13%
2044	48,091	0.11%
2045	40,668	0.09%
2046	33,246	0.08%
2047	25,823	0.06%
2048	18,401	0.04%
2049	10,978	0.02%
2050	3,556	0.01%
Total estimated ERs	43,973,073	100.00%
Total number of crediting years	30	
Average annual ERs	1,465,769	

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.