Submitted to: Verra
Project under public consultation: Gairova REDD+ Project (ID 2870)

Public consultation response

Gairova 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, Biofílica, 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 assumptions

We understand that the choice of "C" modeling is used. The PD states generally that there is a correlation between agents and drivers with the occurrence of current deforestation, as well as a trend in the increase of deforestation in the coming years. For example, there are plans for constructing new hydroelectric dams within the region which could affect the project area and increase deforestation due to a large displacement of people.

However, the PD presents no evidence (graphs, tables, or maps) or a mathematical model that proves the direct or isolated influence of one or more agent/drivers and the increase in the rate of future deforestation following a different dynamic from the past. It only provides a descriptive analysis of the conversion of forest areas in the region to pasture, the loosening of Brazilian environmental laws, and the weakening of environmental surveillance. It does not present tables with the values of deforestation projections (baseline) either for RR, PA or LK. Net GHG is estimated at 1,297,696 tCO2eq in 30 years, which means an annual average of 43,257 tCO2e (please note the project does not display values of VCUs expected to be generated per year).

If RR is not yet defined, how was it possible to estimate GHG emission reductions?

Section 1.11 states about plans to build hydroelectric plants in the region but it doesn't describe how it is going to affect the project (and no further comments are made about this subject).

Safeguards

As we have previously commented to Verra, we think it would be important to consider making this section mandatory during the time of public consultations. The Gairova REDD+ Project, for example, has left the sections on safeguards blank. It is difficult for other stakeholders, such as ourselves, to comment on whether safeguards are being properly implemented if this type of information is not expected at this point of the process. We urge Verra to reconsider this process.

Other comments

It would also be good to have more clarity on certain aspects of the project. In particular, the monitoring plan, indicators to be evaluated, safeguards, among other relevant information, were not informed. Specific social and environmental activities the project proponents intend to develop following the SocialCarbon label are also not made explicit.

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.**