

Submitted to: Verra

Project under public consultation: ARCA REDD+ Project (ID 2871)

Public consultation response

Arca 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 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

The only explanation regarding the baseline was that it used a modeling "c" approach. However, we found it alarming that no calculation was presented. The projection of future deforestation is not available. In addition, the calculations regarding the estimation of VCU's that will be generated as well as the carbon stock values were not made available. It would be important to understand how the project estimated these values to evaluate their accuracy.

Ownership of the land

The properties composing the project area are owned by Arca S/A Agropecuaria. However, it is important to prove ownership. Arca has stated that the legal documents proving the land title and ownership of the properties will be made available to the auditors during the validation process. It is essential these documents be made available also during the public consultation phase to understand their veracity. Especially in the case of the Amazon it is important to take into account land disputes and land grabbing, and it is necessary, especially for large extensions of rural areas, the research and detailed study of the ownership chain of properties. It is also important to

request the certificates of the sale and purchase deeds referred to in the certificate to try to identify the origin of each title of predecessors.

Safeguards

The most problematic part of the document are the many missing elements within the safeguards section. Specifically, the sections on local stakeholder consultations and AFOLU-specific safeguards are left completely blank. We find it impossible to assess, and are left to assume, that the proposed project would not implement the appropriate safeguards needed.

Start date

According to VCS Standards, page 26, AFOLU projects shall initiate the pipeline listing process (as set out in the VCS Program document Registration and Issuance Process) within three years of the project start date. The project start date was set to 01/08/2018. Was the pipeline listing process started before this date?

Reference Period

In page 30, the project proponent mentions the reference period as being from November/2010 to November/2020. However, this reference period has its last date more recent than the proposed start date. According to the methodology, the reference period must be set before the start date. On page 32, another reference period is mentioned (this latter should be correct).

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**.
