

Submitted to: Verra

Project under public consultation: [Rio Madeira grouped REDD+ Project \(ID 2878\)](#)

Public consultation response

Rio Madeira grouped 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 Brazil, 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

Modeling approach ("C") was selected in the draft document to quantify the future deforestation, according to the conclusive evidence in the increase of the rate of deforestation. However, it does not present evidence (graphs, tables or maps) or a mathematical model that proves the direct or isolated influence of one or more agent/driver and the increase in future deforestation rate following a different dynamic from the past. It brings only a descriptive analysis of the conversion of forested areas in the region to pasture, the illegal timber trade, the loosening of Brazil's environmental laws, and the weakening of environmental enforcement.

Also, the delimitation of the reference region and eligible area is not defined, therefore it can not verify how was calculated *ex - ante* estimations (5,344,693 tCO₂e during the crediting period). In addition, the project does not present VCU values that it intends to generate per year.

The analysis of agents, drivers and underlying causes of deforestation does not present a clear causal sequence of the chain of events leading to deforestation thus it is not possible to corroborate if the project activities actually contribute to the reduction of deforestation.

When **identifying** agents of deforestation, no bibliography is given to support the argument that cattle ranchers are a treat in that specific region.

Project Proponents and Ownership

The document does not describe the type of information that is used as support to prove landowner rights (deed, purchase agreements or others). No detailed information on the land aspects or any governance structure was presented. Also, there is no information about rights or sharing of credits has been mentioned.

Safeguards

This information is not available in the draft document. For projects with additional certifications such as Rio Madeira grouped REDD+, where [Social Carbon standard](#) it will be applied, preliminary information related to stakeholder identification, social characterization and prior consent should be requested.

The only information available on social topics is related to some data in the municipalities of projection of the cultivation of soybean and corn and heads of cattle.

Other comments

The project is incomplete because it fails to present several informations that are requested in the template. Besides those already mentioned, the monitoring plan, the indicators to be evaluated, safeguards, the limit of the reference region, among other relevant information, were not informed. Moreover, they do not describe how the social and environmental activities that they intend to develop following the determinations to achieve the Socialcarbon seal will be developed.

Eligible area: the draft document does not present the eligible area for the project. Also, it is not available the process and sources of information to quantify it.

Project activities: lack of detail in the description of project activities. It is necessary to clarify how project activities will contribute with the reduction of deforestation according to the analysis of chain of events leading to deforestation.

Estimated GHG Emission Reductions: It is not clear how is estimate the reduction in deforestation of 17,720 ha, which is expected to reduce 5,344,693 tCO₂e for the credit period.

Project Boundary: The reference region, leakage belt and project area (forest at start date) are not defined.

Project Start Date: the activity considered for to project start date does not explain how it contributes to reducing deforestation. In addition, if the activities are related to control and surveillance, how can the project ensure that invaders do not displace of deforestation and generate leakage?

Carbon rights: It is not clear what is the role of Carbon Asset (the project proponent company) in the project.

VCS standard: In section 1.4 the criteria of the VCS standard version 4.0 are taken into account and in section 1.8 the VCS standard version 4.2 is referenced. It should check which version applies.



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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**.

