

Submitted to: Verra

Project under public consultation: The Atlantic Forest Biodiversity Conservation Limeira  
Project REDD+ (ID 2950)

## Public consultation response

### The Atlantic Forest Biodiversity Conservation Limeira Project REDD+

[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: Agro cortex, Bioassets, Biofilica, BR Carbon, BVRio, Carbonext, Eco securities, 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:

#### Ownership (VCS)/Legal Status and Property Rights (CCB)

The project area is owned by the company Limeira Indústria e Comércio S/A, according to the document records and the social contract of the project proponent, which will only be available during the audit. However, the property is entirely within the Guaratuba APA, a sustainable use conservation unit, with part of the area also belonging to the integral protection units (National Parks) Guaricana and Saint-Hilaire/Langue.

It is important that all project actions are in accordance and aligned with the management plan of the conservation units and the respective management bodies. **In relation to the National Parks, it is extremely important to verify that there are no overlapping areas, since they are public areas.**

#### Local Stakeholder Consultation and AFOLU-Specific Safeguards

In the Safeguards Section, the PD only identifies the stakeholders and mentions that the project brings socio-environmental benefits to the region but does not specify how. In addition, it states that for participation in project activities, community members will be consulted based on their social representation to verify those interested in participating in

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project initiatives but it doesn't bring details and how they will be involved and how the project will benefit these stakeholders.

### Other Comments

A lot of inconsistencies were presented in the PD:

- Net GHG and VCU values change a lot throughout the document:
- Project cites that the calculations and analyses refer to the first phase of the project first baseline, which runs from 2017 to 2026 (perhaps because of the legal insecurity in operating/developing the project in UC?) "The protection/conservation activity through monitoring is consistent with the uses defined by the APA de Guaratuba management plan and with the uses allowed in national parks according to Law No. 9985/2000, since the mentioned national parks do not have their own management plan. According to the 1st paragraph of article 11 of this law, the lands of national parks are in the public domain and the private areas, including in their boundaries, will be expropriated.", which is strange, since the period for reassessing the baseline in REDD projects has changed to 6 years.
- Divergence between tables 23 and 28 (net GHG of 126mil, but VCUs of 505mil);
- In section 6 (pdf page 108) they present the Baseline Reassessment (2017 to 2021 - 5 years), which also brings strange values. In 10 years, they talked about 125mil tCO<sub>2</sub>, 112mil, 505mil VCUs and in Section 6, 125mil tCO<sub>2</sub> or 111milVCU in only 5 years (2017 to 2021).

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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](mailto:nbs@nbsbrazilalliance.com).

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