

Submitted to: Verra

Project under public consultation: Feijó REDD+ Project (ID 2980)

Public consultation response

Feijó 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 Feijó 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, South Pole and Sustainable Carbon it is great to see new carbon projects being developed.

The following aspects contained within the Project Description were seen as concerns:

Baseline

In section 3.4 Baseline Scenario, it is mentioned that "The weight of available evidence conservatively suggests that the overall trend in future baseline deforestation rates will be "Increasing". During the reference period, the deforestation rate in the reference region has consistently increased. In this context, the deforestation rate used in the projections was the Modeling approach ("c") (see step 4.1.1 of methodology VM0015: Selection of Baseline Approach)."

However, **no calculation of baseline emissions was presented** (section 4.1 Baseline Emissions), **as well as no deforestation rate or projection for baseline**. No estimates of emissions reductions (tCO₂Eq)/VCUs or carbon stock were presented or commented on.

Also, the Section 4 Quantification of GHG Emission Reductions and Removals is totally empty/blank

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

The project area is located on three farms in the municipality of Feijó/AC - Fazenda Cachimbo, Fazenda Escanteio and Fazenda Porto Brasil, which are owned by the company Universal Timber Resources do Brasil LTDA (UTRB). The PDD mentions that the documents proving the land title will be made available for the project audit. It is worth mentioning that NBS Brazil Alliance prepared a “Protocol for prior analysis of REDD+ projects” that should serve as a guide for audits and verification institutions as the minimum criteria to be presented by project proponents for Brazilian projects to ensure documentary regularity and quality.

The draft does not provide information about who owns the credits and who has the right to commercialize them, nor about benefit sharing.

There is no clear governance structure presented. The Alliance strongly recommends that the governance structure be elaborated and presented to guarantee transparency and integrity.

Safeguards and Local Stakeholder Consultation

There is no information in the draft about Safeguards or Stakeholders - these sections are completely blank. Considering that in the contextualization about the use of the area/farms, it is implied that surrounding communities use the project area for some activities such as fishing, it is important to involve these communities and further elaboration on this section.

As we have previously commented to Verra, NBS Brazil Alliance strongly recommends considering making this section mandatory during the time of public consultations. We understand that this information is not required at this point, however we urge Verra to reconsider this process in order to make public consultations more transparent and efficient for all entities involved.

Other Comments

There is no information about protected or public areas surrounding the project area. As already mentioned, the Safeguards section is blank, as well as no information about stakeholders. The Monitoring Section/Monitoring Plan is also totally empty.

Despite being highly relevant information for the evaluation of the project area and land use dynamics, the session 3.3 Project Boundaries presents practically nothing about the

geographic boundaries of the project beyond the boundaries of the properties that compose the project area.

There is no definition of Leakage Belt, Leakage Management Area for the AUD approach. Degradation was not considered on the PD.

The PD mentions SOCIALCARBON and CCB standard guidelines, but it does not indicate which specific project indicators or project activities will be carried out to meet these two standards.

In general, the PD is quite incomplete, with many missing parts, including essential sections for public evaluation of methodological aspects such as Baseline. There are comments on the Reference Region for the AUD approach, and how it was selected, according to the basic criteria for defining RR, but it is not clear what methodology was used for this and no maps were presented to visualize the Reference Region.

NBS Brazil Alliance strongly recommends considering making some information such as Safeguards aspects mandatory during the time of public consultations. The Alliance commented on all the latest projects in Brazil and most of them have the same problems: lack of information to analyze. Arca REDD+ Project (ID 2871), ARR Cerrado Carbon Project (ID 2790), Gairova REDD+ (ID 2870) and Rio Madeira Project (ID 2878) were analyzed and all had the safeguards section in blank.

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.
