

Submitted to: Verra

Project under public consultation: Marauí Program - Grouped Project (ID 3050)

Public consultation response

Marauí Program - Grouped 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

The draft states that "the baseline scenario for a project activity shall be determined for each designated geographic area", but this information does not follow the general rule of the Standard. According section 3.5.9 of the VCS Standard V4.2, "Determination of baseline scenario and demonstration of additionality are based upon the initial project activity instances. The initial project activity instances are those that are included in the project description at validation and shall include all project activity instances currently implemented on the issue date of the project description".

The draft does not mention the approach chosen. It only mentions that Boqueirão Farm is anchored in the G-U1 type baseline and does not provide information on how this baseline type was determined. However, for the quantification of emissions and removals at the baseline, Biomass Emissions (BEM), Soil Emissions (SEM), Decay Emissions (DEM) and Leakage Emissions Model (LEM) models were used. It was justified that the underlying mechanics of the VM0009 methodology uses these four types of emissions models. The calculations were not presented, only the equations and their aforementioned explanations. **The document presents the estimation of 200,000 tCO₂e of average annual emissions reduction over the project's lifetime, totaling 4,000,000 tCO₂. However, it does not indicate the expected generation of VCU.**

Ownership and Project Proponent

Land owner is not a proponent/other entity. For this reason, it is important to pay attention to how this can affect project permanence. It is worth mentioning that for the other PAIs specific documents will be required, including a contract between the Proponent (OnePlanet Ltda) and the Landowner. Also, for a new area to join the Marauí Program, land ownership must not be involved in land disputes. In the Safeguards section, the requirements of the PAIs on risks, mitigation plan, consents (free, prior and informed) and ongoing communication are presented. **However, besides not giving details, it also mentions that the guidelines for resolving possible conflicts between stakeholders are found in the contract between the Proponent and the Landowner, which is not publicly available.**

In section 1.7, it is stated that the project is owned by One Planet, **but there is no information on the division and sale of assets.**

Local Stakeholder Consultation and AFOLU-Specific Safeguards

There will be continuous communication for all PAIs, through periodic meetings. As for Boqueirão Farm, the interested parties (families surrounding the Project Zone and the landowner) were contacted for collaboration on the project design. However, **the aforementioned document does not mention any type of consultation about the consents (free, prior, and informed) about the development of the projects in the visits and/or meetings.** Only in the Safeguards section were these consents briefly mentioned, as per the previous item ("Details about the risks to local stakeholder resources due to project implementation and how the project will mitigate such risks, including plans to ensure that the project will not affect the property rights of local stakeholders without free, prior, and informed consent.)

It is not mentioned how the benefits will be distributed among the interested parties. Furthermore, the document mentions that the resolution of potential conflicts between the Proponent and the landowner will be solved according to the contractual procedure, which is not publicly available.

Other considerations

The PD does not contain enough information to substantiate the generation of credits - which is very high.

The document does not provide much information about AFOLU Specif Safeguards and the DRAFT PD does not make it clear whether the project will have an additional certification or not. Assuming that it doesn't, it's not necessary to identify these terms at this stage.

Also, the project developer has included sections that are not part of the template provided by the VCS Standard.

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), Rio Madeira Project (ID 2878) and Feijó REDD+ Project (ID 2980) 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.
