

Submitted to: Verra

Project under public consultation: Itaúba REDD+ Project (ID 3055)

Public consultation response

Itaúba 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:

Methodology and Baseline

The project uses approach "B" and mentions that the historical analysis of deforestation showed periods in which there was a considerable increase in the deforestation rate. The expected generation of credits is 28,655 VCUs/year, considering a crediting period of 30 years. The biomass data were obtained from the literature, which contains data regarding the total carbon stock in these forests (Lower Montane Semideciduous Forest and Wooded Savanna). According to the PD: the above and below ground biomass averages were used for the calculations, since an official source was applied and therefore the average is statistically representative.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

The identification of local communities was done using remote sensing and the database of the following organizations: FUNAI, ICMBio, IPHAN and INCRA. The only community identified was the Gleba Cafezal settlement, but due to its location and lack of interaction with the properties, it was not considered a stakeholder. Thus, the stakeholders identified include governmental organizations (city halls and secretaries), universities (UFMT) and NGOs (ICV). The areas that comprise the project are private properties and the owners were included as proponents of the project. According to section 2.3.3 a consultation with prior

consent was carried out. The section also mentions a public consultation report, but this was not included in the document.

Thus, the project opted to have three schools in the municipality as beneficiaries. However, no information was found in the PD about previous conversations and consultations with these beneficiaries, nor any further details about how the activities will be carried out, being necessary further clarification since they are applying for CCB.

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**.
