

Submitted to: Verra

Project under public consultation: Alto Xingu Grouped REDD+ (ID 3152)

Public consultation response

Alto Xingu Grouped 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: 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 PD does not indicate the area and boundary of the farms to allow comparison between farm boundaries and forest area within the farms that make up the project. It also does not show the comparison between the project area and the area of the farms and reference region.

The PD states that the most appropriate approach for defining the baseline will be "Model c" - because during the analyzed reference period, deforestation has steadily increased. However, due to the lack of definition of RR in the DP, it is not possible to verify this increase, in quantitative terms (deforestation rate).

The annual estimate of VCU generation or a table projecting the values for baseline is not presented. No estimate of carbon stock is presented either.

Ownership (VCS)/Legal Status and Property Rights

The DP does not provide information about land issues or proof that the properties have all the documents proving ownership of the land. It is extremely important that the audit pay attention to these points.

No governance structure for the project was described.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

No information available

Other Comments

Despite providing information about studies in the Project Reference Region to define the "drivers" of unplanned deforestation (section 3.4), **the PD still does not provide a definition of the project Reference Region (section 3.3)**, and the farms that make up the project border the Parque do Xingu (TI) Conservation Unit - therefore, it does not allow for a comparison between the location of the RR and the project area, and whether it is allocated within the Xingu National Park. **This type of analysis would make a difference in terms of stakeholder engagement and consultation, and overall safeguards processes, since the area is so close (border) to an important Conservation Unit.**

The project is incomplete in the safeguards and monitoring plan sections.

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.
