

Submitted to: Verra

Project under public consultation: Andrade Sun Farms REDD+ (ID 3281)

Public consultation response

Andrade Sun Farms 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 Andrade Sun Farms 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, Biofíllica, Biofix, BR Carbon, BVRio, Carbon Credits Consulting, Carbonext, Centro de Estudos Rioterra, Ecosecurities, ERA Brazil, FAS, IDESAM, Impact Earth, Instituto Ekos Brasil, Permian Brasil, Radicle, South Pole, Sustainable Carbon and Volkswagen Climate-Partner, 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 has some inconsistencies:

- 1) The project is not within the Cerrado biome domain, but within the Atlantic Forest, although there are savanna phyto physiognomies in the area;
- 2) Two of the four phyto physiognomies present are not classified as forests, according to FAO criteria: Cerrado Stricto Sensu and Campo Cerrado, therefore, they are not eligible for VM0007. Proponent needs to explain how he is applying this to the grassland vegetation classes.

The part of the project that represents the enrichment of previously exploited or degraded vegetation, that is, application of the methodology VM0005: Methodology for Converting Low Productivity Forest into High Productivity Forest, v1.2 in the legal reserve area, may not have additionality if the owner has explored this area for the last 10 years. There is no information about this in the PDD.

The part of the project that was classified as REDD, areas exceeding the legal reserve with the application of VM0007, may not have additionality if these areas do not have agricultural aptitude, such as, for example, the existence of a slope greater than 25%. There is no information about this in the PDD.

There are no eligibility sections for applying the VM0005 and VM0017 methodologies.

The expected generation of VCU's/year is 14,693.65. Design time is 20 years.

The baseline scenario indicates degradation of native vegetation in the absence of the project, although estimates have been made for avoided deforestation. There is no information on the annual area that would be deforested for the application of VM0007 in the REDD project. Furthermore, there is not enough information about the common practices in the region that led to the design of the baseline.

Considering our analysis, we understood that the project has 8.3 tonnes per hectare/year of removals. This removal rate per year seems too high. How many trees are being planted to support this claim?

Ownership and Project Proponents

There is no information regarding the legal status or property rights of the land. Although not mandatory, it is good practice to list the main land registry documents. Also, there is no information about rights or sharing of credits has been mentioned.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

The information is not available. It seems like no stakeholder consultation was undertaken.

There are no clear parameters for monitoring the socio-environmental benefits. There is only a brief description under section 1.19 of a social project regarding the capacitation of local teachers from the public school network.

Other Comments

Generally, the PDD is very vague and lacks some main pillars of REDD+ and IFM projects. As mentioned, although this is not mandatory for the initial PDD submission and registration, it is good practice to provide more detail about project specificities, especially regarding sensitive factors such as land ownership and stakeholder consultation.

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**.
