

Submitted to: Verra

Project under public consultation: Boa Esperança Grouped REDD+ Project (ID 3304)

Public consultation response

Boa Esperança Grouped 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:

Baseline and Additionality

Overall, both the eligibility, baseline and additionality arguments deserve some attention, for the following reasons:

- This is private property and **the mention of CAR could be clearer throughout the project, including when addressing compliance (Section 1.14).**
- There is no solid argumentation as to why the most likely alternative is to continue the previous use of the project.
- **The analysis of common practice is shallow.** The query of other projects is limited to the mention of 24 other projects registered with Verra in the State of Amazonas, **but with none in the municipality of Presidente Figueiredo.** The conclusion states that the development of carbon projects is not common in the area and states that the projects that do exist "present essential distinctions between the project presented", but does not elaborate on what these distinctions are.

At other times in Section 3 of the project, there is relevant information that is incomplete or missing, such as:

- Several times the project mentions that aerial image evaluations were made to check that the existing forest has been forest for at least 10 years, however, **no maps of any kind are presented to evidence this claim, for better visualization of the information.**
-

- Regarding the reference areas, Section 3.3 lists the criteria selected to define them, but the section ends by stating that the reference areas will be selected. **That is, the reference areas, their sizes, characteristics and location are not listed, in order to verify similarity with the project area, relevant information for the completeness of Chapter 3.**

- **In the project description, still in Section 1.1, there is the information that 678 ha is the area whose deforestation will be avoided. However, this information does not appear in the boundary definition or in any other section to justify how this number was arrived at.**

Local Stakeholder Consultation and Free, Prior and Informed Consent

Not informed, given that the relevant Section (2) of the DP has not yet been completed, and there are no other mentions of mapping processes and engagement of local stakeholders. **It is worth noting the fact that this is one of the main points of analysis of AUD type projects and the absence of such information at the public analysis stage is a problematic aspect.**

When addressing Contributions to Sustainable Development (Section 1.17), there is a statement that "part of the revenue from the sales of the credits will go towards education and sustainable development of the communities present in the project's reference region", however, without further details.

Other Comments

The PD has formatting and typing errors, and does not present annexes and sections 2, 4 and 5, which are essential for an in-depth analysis. However, the non-presentation of these sections is allowed by Verra for the Under Development status, which in itself is already object of criticism.

A relevant point of attention is Section 1.8, referring to the "Project Start Date". **This section is a direct copy of the "Green Valley Grouped REDD+ Project", also developed by Ecológica Assessoria, with the Verra, under ID number 2871. The "Green Valley Grouped REDD+ Project" itself is confusing, since although it has this name in the registry (<https://registry.verra.org/app/projectDetail/VCS/2871>), when downloading the PD Draft, it is named as "Arca REDD+ Project".**

What happens in the PD evaluated here (Boa Esperança) is that the whole narrative of Start Date is based on actions of Arca S/A, which is not even one of the proponents or participants of the project, but responsible for the ID2871 project mentioned above. In other words, the real basis for the start date of this project was not presented.

In general, the version of the PD made available for public comment is very similar to other PDs developed by Ecológica Assessoria, some of them still under construction in the Verra



platform. **This practice hinders the effective technical contribution by other parties, since the few filled out sections have little relevant technical information.**

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.
