

Submitted to: Verra

Project under public consultation: IPOÁ REDD+ Project (ID 3324)

## Public consultation response

### IPOÁ 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 area seems eligible for REDD+ projects. The DP does not make it clear how it defined the project area respecting the conditions of application of the methodology and applicable modules, which areas were excluded from the project area either because they do not constitute forest, or because they are not legally deforestable (APP, areas with a slope greater than 45 degrees, etc.). On the contrary, the project baseline is based on cutting 20% of the existing forest cover, but this is not technically possible (EX.: "The APD component is regarding a 3.595,72 ha subsection (20%) of the Maanaim and Campos property, which has documented forest clearing plans"). The combination of AUD and APD activities appears to increase the deforestation rate and a deforestation risk supported exclusively by a clear-cut permit of 20% in five years in the absence of the project.

Even though the baseline scenario seems plausible in the context in which the project is developed, the PD does not provide enough information to allow the reader to reconstruct the baseline analysis and estimates. The DP does not present how the methodology steps were followed in order to define the APD baseline, does not present all the relevant formulas, and does not show how data were used to generate estimates. Also, there is a lack of analysis of proxy areas or financial viability conditions to demonstrate the possibility of planned deforestation in the project area and zone.

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Regarding the project start date, the proponent states that APD activities started in May 2022, when the project owner submitted a request to the official organ, IPAAM, to obtain permission to deforest the legal proportion of the project area. However, the Local Stakeholder Consultation (LSC) was conducted before, in March. The proponent should explain why legal deforestation's intention appeared just after the LSC, if it was never considered (or requested to the local authority).

### Ownership (VCS)/Legal Status and Property Rights (CCB)

**The Campos Farm has a title issued by the municipality of Novo Aripuanã over a State Gleba, which is a strong indication of irregularities.** The property registration number appears to belong to two different applicants. See evidence consulted below:

Código do(a) Credenciado(a)

Credenciado(a) responsável técnico(a) pela parcela.

Código do Vértice

Código de um dos vértices que compõe a parcela.

Código do Imóvel (SNCR/INCRA)

Código SNCR do imóvel.

[Pesquisar](#)

**Resultados: 2**

Nome	Área (ha)	Detentor(a)	CNS	Matrícula	Ações
Fazenda Campos - Parcela 1	4796,0277	XXXXXX de Oliveira XXXXXX	00.477-0	2.584	
Fazenda Grupo Leão - Gleba 04 - Parte 1	57124,5958	XXXXXXo Matias daXXXXXX	00.477-0	1818	

**Mensagens**

Remetente	Mensagem	Data
ANDERSON DE OLIVEIRA ALEXANDRE	Boa tarde Senhores, estou aguardando o informe de registro. Se for preciso alguma documentação adicional, peço que me informem por aqui para que eu envie.	12/12/2018
Analista (INCRA SR-15)	Analista (INCRA SR-15) De acordo com a solicitação do requerente, tenho a solicitar alguns documentos para a validação do Registro: a) Certidão de Inteiro Teor atualizado do Estado, pois como é Título do Município e esta fora da área de atuação da mesma, a SPF tem conhecimento, pois trata-se de TD com o reconhecimento do estado. b) Atender o Memo Circular Nº 14/DF/INCRA , onde esclarecer sobre a atualização cadastral ( espelho atualizado da parcela onde consta todas as informações	11/01/2019
ANDERSON DE OLIVEIRA ALEXANDRE	Solicito nova análise do requerimento de Informação de registro da atualização da matrícula em cartório. Solicito ainda, alteração da Matrícula atual para a atualizada 2.819 do mesmo CRI. Documentos solicitados no anexo.	29/01/2019

Anexos

Nova Matrícula Faz Campos	Matrícula 2.819	matricula-faz-campos.pdf
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### Local Stakeholder Consultation (VCS)/Free, Prior and Informed Consent (CCB)

The FPIC process appears very poorly described in the PD and is not sufficient evidence of social safeguarding. The PD actually advocates that the FPIC process is not applicable.

### Other comments

Some of the points presented above have already been clarified by Carbonext. It was mentioned that the other points will be corrected / addressed in the Post-draft.



NBS BRAZIL ALLIANCE  
NATURE BASED SOLUTIONS

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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](mailto:nbs@nbsbrazilalliance.com)**.

