

Submitted to: Verra

Project under public consultation: SIMflor Programme 2 (ID 3332)

## Public consultation response

### SIMflor Programme 2

[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

It provides a descriptive historical analysis of the conversion of forested areas in the region to pasture and agriculture, the illegal timber trade, the loosening of Brazilian environmental laws, and the weakening of environmental enforcement. It does not present tables with the values of deforestation projections (baseline) either for RR, PA or LK or graphs illustrating historical trends in the increase of deforestation rates. The estimated reduction of Net GHG is 357,782 tCO<sub>2</sub>eq in 30 years, which means an annual average of 11,541 tCO<sub>2</sub>e. The project does not present VCU values that it intends to generate per year.

#### Ownership and Project Proponents

The one clustered project area will initially consist of 8 private landowners, constituting a first instance of the Project. No information is provided on the ownership of these areas, only details are provided on how the consultation process worked, review of the documents in general, and signing of the contract between the farmers and SIMFLOR 2.

The Alliance strongly recommends that this information be provided from the public consultation phase of the project.

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## Other Comments

The draft is incomplete as it fails to present various information that is requested in the template. There is no information about latitude and longitude, nor map of location of the properties. There is also no delimitation of the project zone, reference area and other relevant information.

Although it is still a draft, information such as the total estimate and the calculation of the emission estimate should be contained in detail. Where did the estimated value of generation of 1 million tonCO<sub>2</sub>eq/year come from? There is no calculation that shows any estimate of ton CO<sub>2</sub>eq generated. Some factors especially caught Alliance's attention: the legislation informed does not mention the specific decree created for CRA nor the articles of the forest code that deal with CRA and/or PES, which may be a strategy to make it easier for VCS to visualize the additionality of the project or the attempt to insert CRA as a REDD+ activity, justifying the APD project.

The generalizations for calculating emissions present in the description of the baseline and the maps of the areas with limits of the farms (the old version counted with separation of the RL area and excess vegetation area while the new version contains only the total area of the farms without specifications) need to be improved. In Alliance's opinion, in general terms, the initiative of making it possible to verify the emission of GHG by cattle ranching due to the proximity of the radius of existence of the slaughterhouses is good, however the project is very generalist in wanting to approach this estimate of GHG for the entire Amazon without carrying out a regionalization or better description of the methodology adopted. Regarding the methodologies (VM0007 and some items of VM0006v1.3), specifically the methodology of VM0006v1.3 I could not find on the VERRA site.

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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).

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