

Submitted to: Verra

Project under public consultation: **Marajó REDD+ Project (ID 3334)**

Date: April 24, 2023

## **Public consultation response**

### **Marajó REDD+ Project (ID 3334)**

[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 Marajó 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, Conservação Internacional, Ecoscurities, Ekos Brasil, ERA Brazil, FAS, IDESAM, Impact Earth, MyCarbon, Radicle, Re.green, Rioterra, South Pole, Systemica, 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**

VM0037: Methodology for the implementation of REDD+ Activities in Landscapes Affected by Mosaic Deforestation and Degradation.

The project report mentions the existence of a high risk of deforestation due to illegal logging practices and slash-and-burn subsistence agriculture that characterize the main vectors. To reduce deforestation, the project provides for reinforcement of patrolling activities, generation of new sources of income, installation of community biodigesters and water treatment.

Calculation of annual deforestation is presented in the project through the DETER system, which consists of a database of deforestation alerts. However DETER's purpose is to determine short-term trends to direct command and control actions. It is important that the proponent presents an alternative assessment that offers accuracy for the deforestation mapping calculation.

Agents and vectors analysis are descriptive but lack important information – no quantitative assessments, trend analysis, or baseline influences are presented. An evaluation of deforestation trends in relation to a historical period is also not included, as well as an evaluation of the influence of deforestation vectors for future projection.

Demonstration of baseline emission calculations is superficial. Spatial modeling was not presented, which is important since Verra has already widely announced that such simplification of the baseline will no longer be allowed.

It is not possible to interpret the description of the quantification of reduced and removed emissions in order to evaluate the results in the baseline scenario.

### **Ownership and Project Proponents**

The project intends to cover the territories of Ilha Grande do Pacajaí, Taucú, Acangatá and Alto Camaragí. The description in the Legal Status and Property Rights section is insufficient and lacks detailed information.

The proponent does not describe how the process for authorizations will be carried out with the state of Pará or Incra since they are public territories. Such territories present land issues related to the allocation of public areas and overlapping between conservation units and settlement projects.

Even considering that the riverside people have the right to own the areas, the process of land rights would take place by assigning lots to each family. That is, the communities do not have the right to the entire territory delimited as the project area.

The proponent relies on the right to ownership of areas by local communities, which is fragile. It is not demonstrated whether a broad consultation was carried out with the entities responsible for the territory, since apparently the communities do not have a legitimate right to the entire territory of the project area.

It is of paramount importance that the auditor checks whether the associations related to the project actually have the legitimate right to own and manage the entire territory delimited for the project area.

### **Local Stakeholder Consultation and AFOLU-Specific Safeguards**

The project focus on CCB certification and is claiming the three gold seals.

Associations of extractive residents are listed as interested parties. It is stated that the identification of interested parties was done with the support of IRAMA - Instituto Ribeirinhos da Amazônia.

The PDD contains a description of a broad process of identification, stakeholder consultation and FPIC process. The proponent lists an extensive stakeholder consultation process, however the description lacks information and presents little on how the work was done in practice, such as through photos, fieldwork results, etc. In addition, the representativeness of the consultation in relation to the total number of communities living in the territory is not mentioned.

Attention is drawn to the description in the sections related to Training, Work and Safety, given that the project proposes to generate 200 jobs and carry out 1200 training sessions and there is not enough information about it.

### Other Comments

Project foresees ARR activities through the planting of 1000 hectares of forest from 2023. However, the information is not presented on Verra's registration page.

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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**, at **[nbs@nbsbrazilalliance.org](mailto:nbs@nbsbrazilalliance.org)**.