

Submitted to: Verra

Project under public consultation: Harpia Grouped Project REDD+ (ID 3451)

Public consultation response

Harpia Grouped Project 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 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, Biofillica, 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 421 tCO₂-eq/ha is coherent for a region in the north of the state of MT, and the physiognomy of the area. However, as the area has been managed, this value may be a little overestimated. **Since the values used for the calculations were not presented and the area was managed, NBS Brazil Alliance would like to emphasize the importance of conducting a forest inventory to quantify the biomass, or at least, a detailed and auditable study of the managed values in order to quantify how much was effectively removed from the area.**

Ownership and Project Proponents

Not much information for in-depth analysis on land issues.

It is not clear in the DP how the credits are divided between the proponent and the other entities. It is unusual that the land owner is only "other entities" and not co-proposer, considering the fact that they are claiming retroactive credits.

As the sole proponent for the project is Future Carbon one would think that they have already been preserving the area since Dec/2019 (start date). However, if it is the owners of the area that have been preserving it for almost 3 years, without the credit resource, it would be interesting to be clear in the PD who will assume (or continue) the responsibility of

applying the actions of the carbon project from now on (now with VCU resources) since the owners are presented only as other entities: "land owners".

Local Stakeholder Consultation and AFOLU-Specific Safeguards

No information was provided about the communities involved in the project (internal and/or external). Furthermore, it was not reported or described any kind of contact or effort that has been or will be made to establish a relationship of the community(ies) with the Harpia project.

When dealing with the subject in the DP, the SOCIALCARBON® Methodology was mentioned as the tool chosen to apply and measure the benefits of the project (social included). **NBS Brazil Alliance believes that it is of utmost importance that the projects inform how the public consultation process took place.**

It would be very important to have a description of these benefits and how they are intended to be applied in the area to bring positive impact.

Other Comments

Item 1.11 states a project duration period of October 2019 to October 2049, different from the period presented throughout the project (Dec 2019 to Dec 2049), it would be interesting to clarify.

The draft is very incomplete, making it difficult to assess the quality of the project, especially with regard to the project's emission calculations and mitigation actions.

The summary states that the projected deforestation is 3,681 ha, which is equivalent to 1,552,613 tCO₂e in emission reductions over the 30 years of the project's life (09-December-2019 to 08-December-2049), with an annual average of 51,753 tCO₂e . But the information needed to validate these claims is not available.

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.



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