

Submitted to: Verra
Project under public consultation: SIMFlor1 (ID 3451)

Public consultation response

SIMFlor1

[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

Apparently it meets the requirements of the methodology, but the draft is incomplete to state this with certainty.

One point that can be questioned, however, is the following:

Even if the proxy shows that the pattern in the area is to deforest the allowed 20% of the area of the properties, what is the evidence that the owner has the intent to deforest. That is, even if it is the most likely scenario, if a landowner already has a history of conserving his land for many years, what is the guarantee that he would clear the 20% he is entitled to now? Some additional evidence should be provided to indicate the reason for this break in the pattern, especially with respect to areas that are historically preserved even though they are in the arc of deforestation.

The baseline is well structured, but an analysis of the possibility of the "forest-soybean" conversion scenario would be interesting. The conversion of PA to cattle was detailed, however it would be valid to evaluate what percentage of the total programmatic area is converted from forest to soybean. Even if this demonstration would only serve to justify its exclusion as a baseline scenario, it is important that it be evaluated. The same should be done for the analysis of private forest areas in the project area that are kept standing through use for forest management, since this brings resources to the area.

Ownership and Project Proponents

Legitimacy of ownership of the area is presented as a prerequisite for entering an area into the project, but unfortunately it is not clear what evidence is available to evaluate the two initial properties when ownership. Not much information has been described or presented about.

Furthermore, the criteria for evaluating the entry of new areas are a bit vague. Considering the reality of the Amazon region regarding the legitimacy of ownership, in the item 'Inclusion of New PAIs 3.5.16: "Grouped projects provide for the inclusion of new project activity instances', it would be very important to require the evaluation of the dominal chain of ownership in order to increase the assurance of its legality.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

No information was given on this subject. As the project aims to act in a very wide area, it would be extremely important for the proponent to present a clear proposal on how the identification, communication, consultation and interaction with so many local stakeholders will be done.

Other Comments

Regarding the type of vegetation, it was mentioned only in item 1.13 that the dense ombrophilous forest is dominant in the region of the project. However, the project proposes to work in very diverse regions of the Amazon, which makes a more specific recognition of the forest typology of each specific property included in the project important. Unfortunately the methodology that will be used for the quantification of biomass was not presented, but, as this is a determining point in a carbon project perhaps it is worth raising the following point:

The project is aiming to act in a significantly diverse area within the Amazon biome, so at the time of quantification of the stock in each property it is important to evaluate (1) the specific phytophysiognomy of the site (do not consider dense ombrophilous forest as default) and, (2) evaluate and account for the occurrence of forest management within the areas, since this is a common practice that directly affects the stock. Determination of the stock based on forest inventories for each new property is strongly recommended.

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.
