

Submitted to: Verra

Project under public consultation: Xingu-Araguaia Grouped REDD+ Project (ID 3666)

Public consultation response

Xingu-Araguaia Grouped 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 Xingu-Araguaia Grouped 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 Brasil, Ecosecurities, Ekos Brasil, ERA Brazil, FAS, IDESAM, Impact Earth, MyCarbon, Permian Brasil, Radicle, Rioterra, South Pole, 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

The methodology chosen is eligible for the situation presented. The project seems to be additional, for the information disclosed and the area in which it is inserted. Deforestation rates direct numbers should be more available and transparency.

When defining the drivers of deforestation, on Section 3.4, letters "a" and "b" are identical, representing "cattle ranching", with the same content.

Ownership and Project Proponents

Land ownership of the two properties included at the PD (Fazenda Marcélias and Fazenda Luciano) attributed to Célia Regina da Costa. There is no mention to the document that demonstrates land ownership (CAR, SIGEF, Title), which should be available only for the VBB involved. Without this information is not possible to understand if the land tenure is solid.

As for the Proof of Title, regarding carbon credits ownership, it is defined by an agreement signed between Mrs. Célia Regina da Costa and Future Forest.

The only clarity refers to an agreement between the landowner and Future Forest, which indicates that Future Forest has some kind of ownership of at least part of those credits, even though the right proportion is not clear.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

The stakeholder consultation has not been carried out for the project yet. Sections 2.2 and 2.5 explain how the procedures will happen, respecting stakeholders. However, as this is a PD "under validation", this process, specially for a project in which START DATE is October 2020, this type of action should already have happened, as those stakeholders need to be included at the project activities and monitoring.

The stakeholders consultation was not carried out, although the procedures for that to happen in the future are briefly described in the PD. No benefit sharing mechanism has been proposed yet, neither mitigation strategies.

Other Comments

- i. The tables from items 1.5 and 1.6 seem to be the same (project proponent and project participant). Clarify if Future Forest is the only participant in the project.
- ii. It is not 100% clear what is the activity carried out to justify the chosen start date of December 14, 2020. Is it the increasing of the monitoring, some type of contract with a service provider?
- iii. Although Section 1.8 defines the Project Start Date on December 14, 2020, in many sections the crediting period appears as being October 15, 2020.

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.