

Submitted to: Verra

Project under public consultation: Corridors for Life ARR Grouped Project (ID 3727)

Public consultation response

Corridors for Life ARR Grouped 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 Corridors for Life ARR Grouped 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, Ecosecurities, ERA Brazil, FAS, IDESAM, Impact Earth, Instituto Ekos Brasil, 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 PD is complete, with all its sections filled in. The AR-ACM0003 methodology was correctly applied for your eligibility criteria. The additionality is valid, bearing in mind that, even if areas legally protected by the Forest Code (as is the case of APP and Legal Reserve) need to be conserved, this is not what happens in practice in Brazil, which proves its additionality, against a baseline of degraded area.

In AR-ACM0003 there is no such distinction of approach (a, b or c). The baseline assumes that, in the absence of the project activity, the areas, mostly composed of unmanaged and degraded pasture, remain without management and/or improvement initiatives (and, in this sense, without practices of use and management and receipt of inputs. The stratification processes, both for the baseline and for the project, are clear and with methodologies compatible with the methodology and with market practice, for Brazil. The expectation of generating credits is 29,218,937 tCO₂e, for a period of 20 years, totaling 584,279 tCO₂e per year. Thinking about the total project area (75,000), the simplified average is around 390 tCO₂e/ha, which makes sense with the existing estimates for Brazil, for the biome Atlantic forest.

Ownership and Project Proponents

The properties are private and had their ownership confirmed via Property Title Registries. The project does not mention having carried out a more in-depth research on the Domain Chain, which would reinforce the ownership of the area, in addition to the registration. With regard to property rights, other than the land itself, but over the credits, the project states that contracts were signed between the project participants. With the information presented, it is not possible to confirm whether there is evidence of land irregularity. Section 2.5.6 states that "there are no ongoing conflicts or disputes that have not been resolved, either with respect to ownership or existing remedies". Furthermore, the project reports in a transparent manner two discriminatory actions related to some of the properties n° 777/85, which were processed in the district of Teodoro Sampaio – SP; n° 68/72, in the district of Mirante do Paranapanema). However, these have been resolved.

The project has two proponents: IPÊ and Biofíllica Ambipar Environmental Investments. There are signed agreements for the transfer of owners' rights. IPÊ and Biofíllica will share the credits, with Biofíllica as the marketer.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

The PD indicates that the FPIC approach is part of the project and that the owners were incorporated into the project through an agreement signed in an FPIC manner. Workshops were held with rural landowners to talk about the benefits and importance of reforestation, about how the project works and a reading of the contract. In addition, four face-to-face public consultations were held. Two of them addressed discussions on stakeholder profiles and their adherence to the project. The third meeting included a validation of stakeholders and communities by the IPÊ field team, focusing mainly on the characteristics and relationships of communities and stakeholders with the project.

A consultation was carried out with communities and stakeholders, with a presentation on the project, the results of which are very well presented, especially in the table that begins on page 8, indicating all the notes, doubts and suggestions, as well as the dealings. The project informs that its governance will guarantee the involvement of the participating rural producers, who will sign agreements that include all the terms of responsibility, rights and informed consent.

The PD does not contain information about the benefit distribution process, nor does it indicate that it will happen. The project does not foresee risks on natural resources since it does not limit access to natural resources for any actor originally dependent on these resources, which makes sense since the activities will be implemented in private areas of degraded pasture or annual cultivation (mainly sugar cane). Finally, the project does not foresee negative impacts on stakeholders, this is consistent considering that the activities will be implemented in private areas and the stakeholders involved are service providers, nurseries and rural/technical extensions.

Other Comments

The project is well written, consistent. It needs formatting adjustments, such as table numbering and corrections in the Portuguese version, which still has excerpts in English (e.g. page 9). However, this is something that will likely be seen by the validation.

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**.
