

Submitted to: Verra

Project under public consultation: Re.green Atlantic Forest Reforestation/Restoration Project (ID 3743)

Date: 03/25/2023

## Public consultation response

### Re.green Atlantic Forest Reforestation/Restoration Project (ID 3743)

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 Re.green Atlantic Forest Reforestation/Restoration 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, 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

This is an ARR project, whose main objective is the restoration of degraded areas in the Atlantic Forest biome. It is a grouped project and the argument is logical.

About removal estimates and calculations, as much as the estimates are ex-ante, it is noted that the values used are the same for regions of the Atlantic Forest with much lower biomass, also included in the Project Zone. It would be better to make clear the phyto physiognomies where the proponent intends to act, excluding those that have less biomass and are within the project area.

Even if at the end of the crediting period of the project the restoration and stock of a restored forest is reached, projects with harvesting activities must apply the long-term average if they exceed the defined values. In this way, we would like to recommend applying the long-term average for situations in which there will be forest harvesting.

Regarding the application of the AR TOOL 16, it is necessary to consider some disturbance of the soil caused by the machines in the harvests, even if it is smaller than the disturbance of the soil in the planting.

## Ownership and Project Proponents

According to the PD, Regreen itself bought the two farms that represent the initial instances of the grouped project. The project makes no mention of a registration number or deed. We see it as good practice to present these documents at the public comment stage, and we suggest Verra make this a mandatory information.

## Local Stakeholder Consultation and AFOLU-Specific Safeguards

The PD mentions that the stakeholders were identified and consulted, but the project could be more detailed in numbers, responses and feedback obtained, propositions to mitigate risks and specific actions, for the participation of these stakeholders in the project.

It is not described how the stakeholders were mapped within the 20km radius of the PAIs (in the field?). There are also no further details on how the stakeholders were identified and characterized.

We wonder why meetings were held individually and not with all mapped stakeholder groups, and if there is any specific reason for not conducting a plenary.

For communication with the Project Proponent, we suggest re.green to detail on PD the internal operational procedure shared with all stakeholders, like other channels available (a physical one, for example), considering the particularity of certain community members.

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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**.