

Submitted to: Verra

Project under public consultation: NaturAll Carbon Program – Conservation Agriculture and Land Management in Brazil (ID 3746)

Public consultation response

NaturAll Carbon Program – Conservation Agriculture and Land Management in Brazil

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 NaturAll Carbon Program. 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, Ecosecurities, Ekos Brasil, ERA Brazil, FAS, IDESAM, Impact Earth, MyCarbon, Permian Brasil, 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

There are no significant differences at the methodological level, the project used the V.02 final draft of the VM0041 methodology. The project did not present what would be the future scenario without the project and what are the barriers (whether through the analysis of barriers or investment) that the project will overcome to demonstrate additionality. Only a rationale of how the common practice scenario will be evaluated was demonstrated, and the additionality of the project was not demonstrated.

In addition, the additionality of the project must use data from the first instance of the project as a reference (grouped projects criterion) and the superficial description presented mentions a general context of Brazilian agriculture. The first instance of the project is a single farm in the state of Mato Grosso do Sul.

Regarding project longevity, the contracts are for 20 years, with the possibility of renewal for up to 100 years, which does not guarantee a project of at least 30 years, as required by the non-permanence risk tool.

Option 1 was used to calculate C removal. For N₂O emission and removal calculations, option 1 and 3 were used. There is no clarity as to the total area used for calculations of reduction and removal estimates. However, the carbon stock value per year is conservative: 78,085 tons of CO₂e or 1.61 t CO₂ e/ha.year. The project baseline is coherent.

Ownership and Project Proponents

The Project will only include private rural properties. In the PD it is mentioned that there are leased properties, however it is not clear how the issue of "ownership" will be addressed in this case.

The project is managed and implemented by the project proponent NaturAll Carbon Limited.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

The project is carried out on private rural properties where the owner voluntarily agrees to adhere to the agricultural practices suggested by the project.

No type of costs or risks that affect the communities or owners involved in the project were foreseen. The project will be developed on private properties where the owners voluntarily adhere to the agricultural practices suggested by the project, which tend to improve their production processes.

Other Comments

It is not clear how the project will calculate whether N₂O and CO₂ emissions from burning fossil fuels and applying nitrogen fertilizers will be controlled and verified for new instances and current instances, so that this emission source is considered minimal. The methodology requires that N₂O emissions from the use of nitrogen fertilizers must be included in case: they were used in the baseline or the use is higher in the project, when compared to the baseline. The justification for not including this emission source by the project is not based on any of these alternatives. The same occurs for fossil fuel emissions, considering that depending on the baseline of the project, for the implementation of new agricultural practices there is a possibility of increasing GHG emissions. In the PD it is not clear how the project will do this control.

Furthermore, it is unclear whether the project will use the tool required by the methodology (CDM A/R methodological Tool for testing significance of GHG emissions in A/R CDM project activities.5) to calculate the significance of these GHG sources.

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.