

Submitted to: Verra
Project under public consultation: RE.GREEN AMAZON FOREST
REFORESTATION/RESTORATION PROJECT (ID 3772)

Public consultation response

Re.green Amazon Forest Reforestation/Restoration Project (ID 3772)

[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 AMAZON FOREST REFORESTATION/RESTORATION PROJECT 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 with 27 members including Agro cortex, Bioassets, Biofílica, Biofix Consultoria, BMO Radicle, BR Carbon, BVRio, Carbonext, Conservação Internacional, Eco securities, Ekos Brasil, ERA Brazil, Fundação Amazônia Sustentável, Geonoma, IDESAM, Impact Earth, Infrapar Sustainability, MyCarbon, Mombak, Redda+, Re.green, Rioterra, Systemica, South Pole, Sustainable Carbon, Volkswagen Climate-Partner and WayCarbon, it is great to see new carbon projects being developed.

The following aspects contained within the Project Description were observed:

Methodology and Baseline

It is a large-scale pooled ARR carbon project that has the Amazon biome as its operating area and aims to restore (ecologically) 181,500 ha over 100 years. The estimate is 1,072,442 tCO₂e.

Since the project area comprises the entirety of the Amazon biome, which represents 49% of Brazil, the level of detail necessary for the eligibility criteria might be underrepresented. For that reason, it is necessary to have more clarity on how the VCS Standard criteria, that requires the baseline scenario and the rationale for additionality to be applicable for all areas, will be met.

The PDD presents only one instance of 8,826.16 ha and an estimate of 101,185 tCO₂e/year (50 years). The area is located in Maracaçumé, MA.

Environmental characterization was carried out for the "ARR project zone" and for the Maracaçumé instance.

The additionality analysis was carried out for the Amazon biome (project zone), mainly covering the identification of alternative land use scenarios, barrier analyzes and common practice. The arguments that support the previous items are referenced with scientific

publications and public data from Brazilian institutions and are, therefore, sources that can be consulted and investigated by the reading public and stakeholders.

The project areas will be restored based on the following restoration techniques: assisted natural regeneration and planting (intermediate and total with seedlings or seeds). Restoration techniques will be adopted and implemented according to land use history; topography and relief; availability of inputs and local labor; between others. The mixture of restoration methods in the same instance is mentioned in the text as well as the possibility of selective cutting of some species (1 rotation), with the aim of making restoration actions economically viable, depending on the planning of each area.

In the PDD, the following baseline scenarios are presented in the absence of the carbon project: livestock farming and soybean production. The baseline scenario is a bit generic and could have more information to bring more transparency.

To estimate the baseline scenario, there is a simple decision tree that directs the VCU calculations having as a driving factor the presence/absence of trees/shrubs isolated or not in the middle of the landscape (current land use scenario)

It is considered mathematical restoration models for each type of method, whether or not including forest cutting/harvesting. It is important to mention that the mathematical models consider the growth curve of Poorter et al. (2021), average annual increment and AGB/ha stock for the first 20 years and between 20-60 years. Bibliographic references are from scientific publications, IPCC and the methodology itself. It is important to mention that estimates of total removals for the area of 181,500 ha were made for 60 years, despite the project's credit period being 100 years.

The estimated LTA (long-term average) for areas that include forest cutting/harvesting was 9,969,809 tCO₂e. And the buffer is 10%.

To estimate forest carbon in the field, two methods are considered, census and stratified random sampling, which are in line with the A/R-ACM0003 methodology and good forestry engineering practices. They consider the above- and below-ground carbon pools of trees and shrubs; dead wood and litter; organic carbon in the soil.

Monitoring will include field activities (census and/or forest inventory, use of drones and UAVs) and remote activities (remote sensing techniques using satellite images, among others).

It is not recommended that a single reference for biomass is adopted for the whole project area, considering the existence of different physiognomies in the Amazon.

One important point to consider is that there were references used to studies which are specific to the Atlantic Forest. It is recommended that specific references of the Amazon are used. For example, the reference for calculating biomass enhancement to Lindner and Satler (2012), which is specific for growth in the ombrophylous dense forest of the Atlantic Forest in Rio de Janeiro. It is known that the Amazon biome grows and enhances biomass in a very different way than the Atlantic Forest, for which the reference use is inadequate.

Ownership and Project Proponents

According to the PD, Re.green itself owns the property that represents the initial instance of the project. The future project instances will be bought or leased by Re.green. It presents the possibility of partnerships with individuals and legal entities throughout the project, highlighting legal due diligence as a negotiation stage.

However, there is no reference to the registration number or any further information regarding the land tenure aspects of the project. As such, it is not possible to assess the associated risks.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

In the PDD, the safeguards and the stakeholder consultation process are designed at a general level for the "project area" and specific to the Maracaçumé instance in a brief and non-detailed way.

Re.green claims the stakeholders were consulted, but does not specify who, how many, how the consultation was conducted, which concerns were raised, how such concerns were considered in the project etc. The release of such information would be especially important, considering the project area represents 49% of the country's territory and the entirety of the Brazilian Amazon. Therefore, there is a considerable amount and diversity of potential stakeholders.

Re.green listed in a little more detail the activities that will be developed in the first instance, where consultation with stakeholders will also be conducted. Stakeholders were identified within 20 km, but there is no clarity on the details of the consultation. As such, it is not possible to assess the associated risks.

It is mentioned that the company Synergia Consultoria Socioambiental LTDA, which will conduct the consultation, and which until now has been identifying communities within a 20km radius of the Maracaçumé project area (PAI-001) as well as characterizing the surroundings.

The benefits of restoration actions at the local and biome level were listed.

Other Comments

The project is robust in terms of removal estimates and writing based on scientific evidence, however, the project area is considerable and information necessary to meet the methodology criteria might be underrepresented.

The project is also still incipient in the distribution/sharing of benefits, socio-environmental activities, for example.

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, Carla Zorzanelli**, at nbs@nbsbrazilalliance.com.