

Submitted to: Verra

Project under public consultation: Samaúma REDD+ Project (ID 3816)

Date: 03/29/2023

Public consultation response

Samaúma REDD+ Project (ID 3816)

[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 Samaúma 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: Agro cortex, Bioassets, Biofílica, 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:

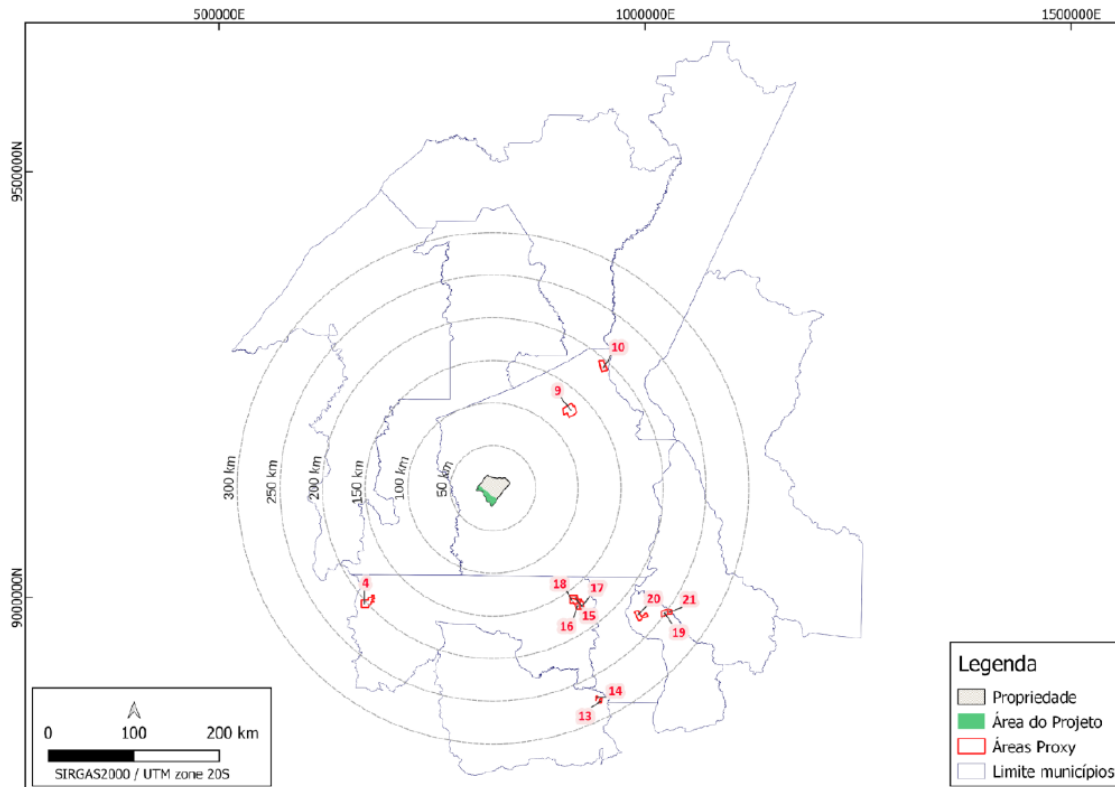
Methodology and Baseline

The Samaúma REDD+ Project includes AUD and APD using the VM0007 REDD+ Methodology Framework (REDD+MF) methodology, v1.6.

The additionality of the APD project is based on the conversion of forest into pasture for cattle raising and sale of wood. This conversion is being guided by the Brazilian Forestry Code, where the landowner can suppress the excess Legal Reserve, and in the case of the property in question, as it is located in the Legal Amazon, it can suppress up to 20% of the total area of the property, provided that have the license to do so approved. The Project Description does not cite or show evidence of the license before the state agency, for the suppression of the 20% allowed by law.

One of the items that are requested as a “Basic Requirement” for the vegetation suppression license by IPAAM (Amazon Environmental Protection Institute) is the receipt of the CAR (Rural Environmental Registry), which was not mentioned in the project description.

For calculation and definition of the baseline, 12 proxy areas were used, which are in other municipalities and not much detail was given about them to compare the similarities with the project areas, in addition to being significantly smaller areas. It is recommended to use larger areas, such as the project, so that the reality of the region is more accurately portrayed. The use of a sum of small areas can inflate the deforestation rate.



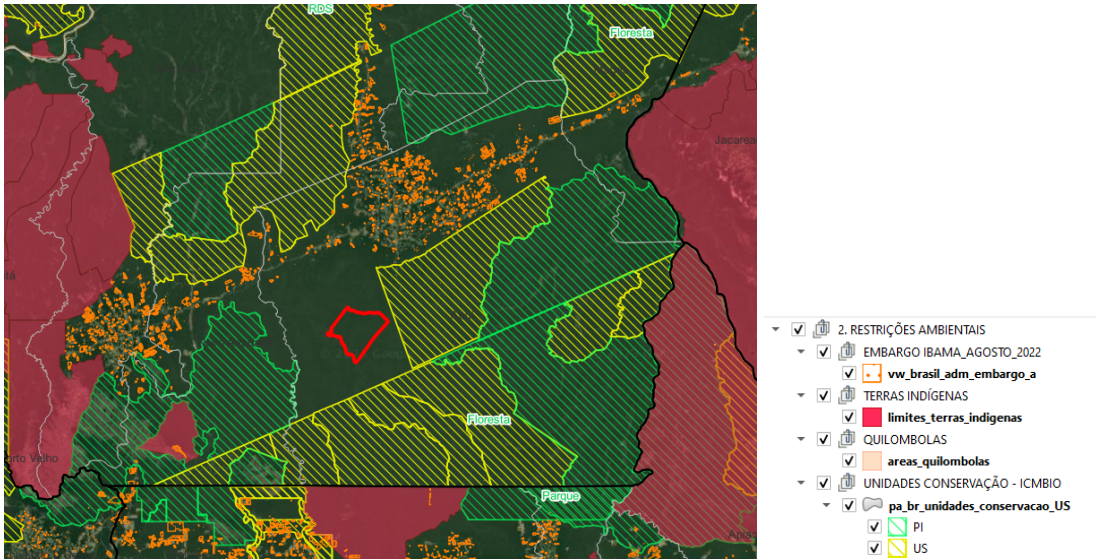
A graphic representation that reinforces the similarity of the proxy areas with the project area was not verified in the PD. In addition, even reporting statistical variables used for the accuracy of choosing these areas as parameter D%, level of confidence and uncertainty, these values were not discretized both in relation to the physical variables used (similarity between forest classes, soil classes, slope classes and elevation), and comparatively in relation to the project area. It is recommended to use a table to facilitate the visualization and comparison of these data.

Another point of attention is the possible interference of legally protected limits in relation to the reference areas. Even if the reference areas have similar physical characteristics to the project area, areas protected by law such as conservation units can impact different deforestation behavior in a given region.

Ownership and Project Proponents

The SAMAÚMA REDD+ PROJECT is a grouped project, but only in one area, in the project description, does it make clear the possibility of adding more areas according to the eligibility criteria and similarity with the pioneer area. We did not have access to analyze the registrations and full content certificates of the properties that make up the project. **We suggest Verra make this a mandatory information.**

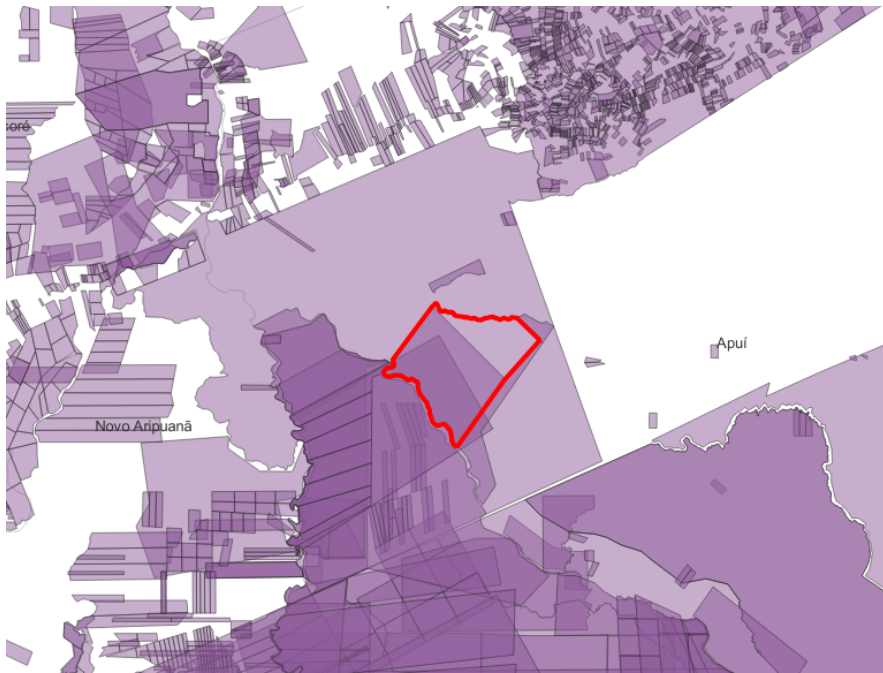
In spatial analysis, the project's Property does not intersect with Conservation Units, Indigenous Lands, Quilombolas, IBAMA Embargo Areas and non-allocated Public Areas.



However, the project area intersects with the PAE Aripuanã-Guariba settlement, created on 12/23/2005, covering 792,166 hectares, and described as a Settlement under Installation. It is important to prove the non-existence of this settlement with INCRA and to present evidence, such as documents and certificates. Here is a map of the settlement:



Despite mentioning the registration of the two properties present in the project area with INCRA and CCIR, the situation of the properties with the CAR (Rural Environmental Registry) was not mentioned in the PDD. Below is the representation of self-declared CAR data referring to the boundaries of properties close to the project area:



As noted, we noticed several overlapping property boundaries registered with the CAR, with 4 boundaries intersecting with the project area:

cod_imovel	Property Status	Criation Date	Area	Status	State	City	Cod_City_IBGE	m_fiscal	Property Type
AM-130330 4-D36D089 A9AED4A82 972B702B0 A502E34	SU	17/12/2019	794.183	Waiting for analysis	AM	Novo Aripuanã	1303304	992.728	AST
AM-130014 4-2419F738 8AA949B7A 20D56C70C 29DF5C	AT	01/12/2022	2.862	Waiting for analysis	AM	Apuí	1300144	286.168	IRU
AM-130014 4-A11A8791 A0EA48D09 C88302F1F A34441	AT	24/02/2023	145.199	Waiting for analysis	AM	Apuí	1300144	14.519.881	IRU
AM-130014 4-12800B7F 7F9240F4A E9C707E58 A2B7A4	AT	02/03/2023	51.033	Waiting for analysis	AM	Apuí	1300144	5.103.306	IRU

The boundary of the polygon attached via kml of the project has an area of 71,696.18 ha, being constituted as described in the PDD by the Samaúma Farms (50,984 ha) and Samaúma Remanescente (20,873 ha). As verified in the table of CAR properties that intersect with the project area, there is no property with a limit close to 20,000 hectares corresponding to the Samaúma Remanescente Farm declared in the PDD, and it is necessary to verify its registration with the CAR.

There is a property code AM-1300144-12800B7F7F9240F4AE9C707E58A2B7A4 with an area of approximately 50,000 ha, and it is necessary to confirm whether it is in fact the same as that reported in the document (Samaúma Farm). The Legal Reserve limits registered on the CAR property of approximately 50,000 hectares are in compliance with the legislation.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

In the project, all stakeholders were described, meetings and meetings for engagement were mentioned, but the minutes were not made available and not even if all representatives of each stakeholder group were present.

Other Comments

It is not clear in the project who will commercialize the credits, it being understood that they will be the proponents themselves.

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**.