

Submitted to: Verra

Project under public consultation: Amazon Biome Conservancy Grouped REDD + Project (ID 4016)

Public consultation response

Amazon Biome Conservancy Grouped REDD + Project (ID 4016)

[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 Amazon Biome Conservancy Grouped 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: Agrocortex, Bioassets, Biofíllica, Biofix, BR Carbon, BVRio, Carbon Credits Consulting, Carbonext,, Conservação Internacional Brasil, 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 methodology was rigorously applied, in accordance with VM0007 and the associated modules, except for carbon stock sources (field data x literature sources). The PDD is complete and well organized, with all information for the analysis. The project is additional according to criteria and the methodology applied.

Baseline in accordance with the baseline scenario that involves pools and gases, previous and final carbon stocks, project area, annual planned deforestation area, and eligibility criteria. The total estimated ERs is 2,937,792.88, in 30 years of project, resulting in average annual ERs of 97,926.43. Carbon stock, taken from secondary data, is slightly higher than that published in the Fourth Communication from Brazil to the UNFCCC for the same phyto physiognomy and biome. Forestry inventory is needed to validate the carbon stocks.

Ownership and Project Proponents

There is very little information regarding ownership. The project proponent merely mentions that the landholder has all required legal documents to prove land title and ownership, without mentioning the local land registry numbers, rural environmental registry code or the INCRA proceedings, which is generally seen as good practices in Brazilian projects.

Also, Systemica is the project proponent, but it is not clear who has the rights to commercialize the credits.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

The proponent conducted a stakeholder consultation and thoroughly described it in the PDD.

The proponent claims there are no direct stakeholders (only stakeholders living outside the project area), and that the project does not infringe on private, stakeholder, or government property or relocate people off their lands, and neither does the landowner face any land tenure or resource access and use disputes. These claims are not supported by any evidence that can be verified at this point, for as mentioned, the landholder does not provide many land registry documents in section 1.7.

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.