

Submitted to: Verra

Project under public consultation: Agropalma REDD+ Project (ID 4034)

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Public consultation response

Agropalma REDD+ Project

[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 Agropalma 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, Ecosecurities, Ekos Brasil, ERA Brazil, FAS, IDESAM, Impact Earth, MyCarbon, Radicle, Re.green, Rioterra, South Pole, Systemica, 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 observed:

Methodology and Baseline

The project methodology application section is complete and contains all criteria and requirements of VM0015. It does not present changes, the tools are justified and used properly with sufficient information. The additionality of the project is detailed according to the methodology step by step and presents activities relevant to the community and biodiversity, however the financial analysis was not presented because it is still being developed.

Approach 'b' was used, and the justification in section 3.1.4.3.2 is very well based on the data presented by the analysis of the dynamics of deforestation. The baseline was made from linear regression and has an R^2 of 0.96. There could be a clearer explanation of why the statistical method is being used in R and why the 2018 breakdown was chosen (item 3.1.4.3.3). The spatial allocation is very solid and with a very robust justification. The area of the PA is 50,519 ha. The generation of VCU for the first year of the project is estimated at 280,810 tCO₂e and for 2031 estimated at 978,312 tCO₂e. The net emission reduction by the end of the project is of 591,917.73 tCO₂e.

There is no PA overlap either with LB or PAs.

Ownership and Project Proponents

The Project is located on a farm owned by the Agropalma SA group. The description of land aspects is made indicating the rights of land use by the Agropalma Group, as well as the right of access to the natural resources existing therein, under the terms of the Federal Constitution of Brazil and the Civil Code. The documents proving the right to use and exploit the land will be provided for the audit. There is mention of the purchase and sale agreement and registration of the property. The company Agropalma therefore has legal responsibility for the project farm and for any conflict related to land use on site or illegal activities, as well as for the protection of the area. There is no indication of land irregularity and/or land conflict from reading section 2.5 - Legal Status and Property Rights. The project meets the legal requirements and is acting in accordance with the law. A governance structure and a plan to strengthen local governance were presented.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

As described in section 2.3, the project carried out a socioeconomic diagnosis with identified communities in the project region (living in the surroundings and working on the project farm), with support from the Peabiru institution. The diagnosis was carried out to verify direct and indirect impacts on the identified communities. The result of the diagnosis was presented at a meeting that invited 23 local communities and local institutions (government, secretariats, etc.), at the same meeting, activities that the project will carry out involving local communities were presented. The project has implemented ombudsman and activity monitoring mechanisms.

The project will implement activities of a social and economic nature for communities surrounding the project, mainly related to the promotion of sustainable production chains and qualifications/training. The project could provide more information about the sharing of benefits from the sale of credits with surrounding communities.

The consultation and research process with communities was described in section 2.3 to access possible impacts and risks. However, the project proponent could also provide more information on the methodology and stages for carrying out the identification of stakeholders, especially with regard to the presence of traditional communities in the surroundings, which influences the identification of project risks. With regard to the permanence of the project's CCB benefits, it is important that the proponent also brings more clarity to how the project's beneficiaries will be chosen.

Other Comments

In general, the PD presents in detail all relevant criteria for evaluating the integrity of the project and applying the methodology. The project intends to obtain the Gold Level CCB in the Biodiversity category due to the protection activities for the presence of endangered species in the AP.

The contract closing date of 07/26/2021 is mentioned as a possibility for defining the start date. The argument is valid according to the presentation of the minutes, evidence of the meetings, however, as observed in audits and experiences, field actions are more effective for proof of a start date. The methodology includes "implementing management or protection plans" in the scope to define the startdate.

In terms of Biodiversity, a few considerations:

- a) Reference to the Red Book of Endangered Flora needs to be reviewed. It was mentioned the text CNCFlora, 2018, but the list is from 2013 (CNCFlora, 2013);
- b) On pages 240/241, for the List of Threatened Species of Flora it is not clear/the origin of the reference "List of Threatened Species in the State of Pará" - Para, 2009 is not mentioned.
- c) On pages 240/241 the relationship between the data in the text and the data in the table is incorrect: "Regarding endangered flora species, 12 species are classified in some threat category according to the official federal list (MMA, 2014); 17 according to the Red list (CNCFlora, 2018) ; and 8 endangered species according to the List of Threatened Species in the State of Pará, 6 of them with confirmed occurrence in Agropalma area, as shown in Table XX below." Comparing with the table, it should be: "Regarding endangered flora species, 11 species are classified in some threat category according to the official federal list (MMA, 2014); 10 according to the Red list (CNCFlora, 2013); and 8 endangered species according to the List of Threatened Species in the State of Pará, 6 of them with confirmed occurrence in Agropalma area, as shown in Table 47 below.". About this:
- d) Review the text for the classification used for "threatened species". It is emphasized that endangered species are those considered within the VU, CR or EN category. The acronym NT refers to near threatened (not yet) - but in the count of "threatened species" the NT has been included.
- e) On page 241 the text could have more information on how the methodology for field sampling for fauna was carried out.

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**.