

Submitted to: Verra

Project under public consultation: The Cauaxi REDD+ Grouped Project (ID 4042)

Date: 04/05/23

Public consultation response

The Cauaxi REDD+ Grouped Project (ID 4042)

[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 The Cauaxi REDD+ Grouped 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, Biofílica, 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, 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

Historical deforestation data were not presented, making it impossible to verify the correct application of methodological rules, such as the project's option for the modeling approach and not for the historical average.

In the reference area, deforestation in the last two years (2021 and 2022) was approximately 24,000 hectares. In the modeling, the estimated deforestation for the first year of the project will be 184,496.58 hectares, which represents 600% more than what happened recently. Also, we do not understand why the GHG Emission Reductions estimation was calculated only for the next 10 years.

The value of 9.24 VCUs/hectare seems quite high for a REDD project.

Other Comments

In general, more precise information on the calculation of avoided emissions is lacking, especially with regard to deforestation data in the region and the model chosen for calculating the generation of VCUs.

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**.