

Submitted to: Verra

Project under public consultation: Amazon Bluecarbon Grouped REDD+ Project (ID 4068)

Public consultation response

Amazon Bluecarbon Grouped 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 Amazon Bluecarbon 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, Ecoscurities, Ekos Brasil, ERA Brazil, FAS, IDESAM, Impact Earth, MyCarbon, Permian Brasil, 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

Mangroves are recognized coastal wetlands under tidal influence. So, the project shall adhere to REDD+ and WRC requirements.

If looking to the selection of the Management Area (LMA, Page 54) and Reference Region (RR, Figure 2, Page 68) it is evidence that the similarity criteria (e.g., similarities between ecosystems and therein forest composition) may not being respected and need to be re-evaluated. Also, the project area must be inserted within the project area, which was not applied.

The selected reference (Fearnside 1996, Table 1) did not use data from conserved/impacted mangroves. In this sense, the standard used to assess the loss of carbon stock in mangroves is mistaken. Also, the dataset used to calculate the average carbon stock values (Page 87) was not based on mangrove and any other blue carbon ecosystem with a similar burial/stocks/sequestration pattern.

The Reference Region (Page 99) is mainly composed of terrestrial ecosystems, e.g., Brazilian Cerrado, but mangroves are wetlands; so, the authors considered that mangroves could be removed by cutting and burning like land ecosystems, which is drastically wrong. By this, these topics do not correspond to the ecosystem of interest. In this sense, which

were the technical arguments for choosing these factors that are evidently mistaken? How will the developers justify data that does not correspond to mangrove ecosystems? How will the developers solve these critical problems (it needs to be clarified)?

The reference region was poorly designed once it needs to overlap the project area according to VERRA requirements. Also, the selected pressure has to be the same in the reference area, but all mentioned risks are too far from the project area or related to ecosystems completely different from mangrove ecosystems, such as the mining in Central Amazon; and/or are based on human population growth that is absent in the interest area according to the document (e.g., see Page 48, 58, and Tables 35 and 36). In this sense, how can the project assume that will avoid the future deforestation of 290.46 ha?

Ownership and Project Proponents

The developers submitted the project to the VERRA list without verifying the documents legality.

Other Comments

In general, this Blue Carbon project is controversial regarding the information presented throughout the document, as shown above. In addition, the document presents several conceptual problems about mangroves, as well as errors related to VERRA VCS requirements; which directly impact the development of the project.

Also, this PD was based only on secondary data analysis, and no collection was made within the project area.

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.