

Submitted to: Verra

Project under public consultation: Fazenda Boa Vista Afforestation Project (ID 4072)

## Public consultation response

### Fazenda Boa Vista Afforestation 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 Fazenda Boa Vista Afforestation 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, 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

In Title and Reference of Methodology, it is important to refer to the version of the VCS standard followed by the project.

It was not possible to verify whether the project is located in a wetland, as the figure referred to in the PDD does not exist.

The proponent used linear emission removal estimates. It seems that for eucalyptus a sigmoid growth curve would be more appropriate.

The additionality analysis is insufficient to demonstrate the additionality of the project, where the proponent justifies that without the carbon project the most likely scenario would be the maintenance of areas as pastures. Also, there are not enough alternative land use scenarios and the consistency of the alternative land use scenarios with regulatory requirements is not fully explained. The barrier analysis does not provide documented evidence and it seems fragile, as there are credit options for small and medium-sized producers in the market, in addition to public policy support (Pronaf, for example).

As the additionality analysis resulting from the application of the “Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM Project activities” is insufficient, the baseline scenario proposed in the document is not justifiable.

## Ownership and Project Proponents

The landowner of the Fazenda Boa Vista II property is Brazilian Forestry Empreendimentos Florestais Ltda. In accordance with the PDD, ownership is evidenced by a title deed (“Certidão de Propriedade”) issued by the Cartório Registro de Imóveis (“CRI”) of Jequitinhonha, Minas Gerais. However, the land documents were not provided for the review.

The project proponent is Carbon Credits Consulting SRL and the other entities involved are Carbon Credits Consulting Brazil as project developer and Brazilian Forestry Empreendimentos Florestais LTDA as landowner and forest owner.

The PDD mentions that the rights to the credits are defined by the Collaboration and Partnership Agreement (“Contratto di Collaborazione e Partnership per L’ottenimento di VCUs”), but it does not specify whether this is between the proponent and the participating entities, or who has the right to commercialize the credits.

The evidence of the agreement is cited in the PDD, but it wasn't provided for the review.

## Local Stakeholder Consultation and AFOLU-Specific Safeguards

Stakeholder consultations were held with institutional stakeholders such as the Instituto Estadual de Florestas and the Secretary of Public Services and Environment, and with community stakeholders including internal farm workers (employees at Fazenda Boa Vista II) and neighboring farmers.

The consultation process has been described in the PDD, but the communication of the risks, costs and benefits of the project, as well as compliance with all relevant laws and regulations on the rights of workers, is still pending, as this must be completed before the project is validated.

There is not a FPIC document.

Participants in the local stakeholder consultation did not report any negative impacts on local resources, and according to the PDD, if well managed, forest plantations can have a positive impact on the environment, especially in degraded ecosystems. The social safeguards are very general and it would be important to better detail the group, the impact, the type of benefit, and what is the change in the well-being of the employees.

The PDD identifies the risk of forest fires and describes the preventive measures to be developed to reduce the impact on the plantation.

It does not describe the beneficiaries or the distribution of the benefits.

According to the VCS Standard, Safeguards Section, the project shall justify the use of non-native species over native species, and explain the possible adverse effects of non-native species, which was not addressed in the PDD.

## Other Comments

Eligibility: The VCS standard states that “activities that convert native ecosystems to generate GHG credits are not eligible” and “the project area shall not be cleared of native ecosystems within 10 years of the project start date”. As the project area is located in savanna/seasonal forest, the project needs to clarify whether the project pastures are native ecosystems, as the argument given in the eligibility of the project: “it is evident that already in 2008 the land of the project area was characterized by degraded pasture and before the start date the activity practiced was still cattle rearing” is not sufficient to demonstrate that the savanna ecosystem has not been affected by the project.

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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.com**.