

Submitted to: Verra

Project under public consultation: Canindé Grouped REDD+ Project (ID 4082)

Public consultation response

Canindé 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 Canindé 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, Biofílica, 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

Figure 14 indicates a leakage belt, which seems to cover both forest and non-forest areas. It would be interesting to include a description of the area (in hectares) for each land use, in order to identify whether it complies with the requirements of the methodology.

The project indicates that the eligible areas have been defined as forest for at least 10 years, however it does not include evidence to support this assertion.

In the table in section 3.2 (eligibility criterion B) it is indicated that logging does not occur in the baseline and project scenarios. However, in the additionality analysis (section 3.5) and in other sections of the PD it is indicated that the areas have a Sustainable Forest Management Plan (PMFS) and this would be executed in the baseline and will be executed in the project scenario.

One of the initial instances is not located within the Grouped Project Area (which is defined as the Reference Region).

AUD: Initially, the project indicates that it will use the C approach: *"During the reference period, the deforestation rate in the Reference Region has consistently increased. In this context, the deforestation rate used in the projections was the Modeling ("c") approach (pg. 103)".* However, in another section of the PD he indicates that the A approach was used: *"the Historical Average (Approach A from the applied methodology) was chosen as Baseline*

Approach, since deforestation rates measured in different historical sub-periods in the reference region reveal a low increasing trend and therefore, in order to be conservative, a constant historical average deforestation rate trend was utilized to project future deforestation (pg. 116)". Furthermore, the document indicates that the database used was MapBiomass, however the included map (Figure 22) comes from Global Forest Watch.

APD: The project indicates that the deforestation rate was determined in accordance with the vegetation suppression plan. However, the document does not indicate the rate adopted or documentation to support it.

The carbon stock value adopted comes from a study carried out in the state of Amazonas. The study estimated the carbon stock for Terra Firme forests, based on a forest inventory. The PD equates the stratum identified in the project (Dense Lowland Tropical Rainforest) to the stratum found in the study (Forest of Terra Firma) and thus adopts the carbon stock value of the same.

The project estimates an average of 50,701 ERs/year for AUD activities and 5,448 ERs/year for APD.

Ownership and Project Proponents

The project area consists of 3 private properties. The PD indicates that the documentation (CAR, Registration and Incra Certificate) will be provided to the validators, however it does not provide information about them.

Future Carbon Holdings is the holder of the right to the credits, since a contract was signed between it and the owners.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

The PD describes the consultation process very superficially, so it is not clear whether it was carried out or not. The document does not include a list of identified/consulted stakeholders, a description of the communication process and invitation to the consultation, information about the consultations (date/place), comments received, etc. This issue is extremely important and requires further development and transparency in the PD, since the project area borders both a settlement and an indigenous land.

The project currently does not include CCB certification, and the properties included are private. Therefore, there is no distribution of benefits. The project indicates the risks and forms of mitigation (superficially and generically). However, as there is insufficient information about the local consultation, it is not possible to confirm that all risks related to local communities and close to the project area were considered.



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**.