

Submitted to: Verra

Project under public consultation: Arataú River REDD+ Project (ID 4084)

Public consultation response

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 Arataú River 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, 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

The criteria are adequate for the chosen methodology. However, it would be interesting if a link to the Social Carbon report was provided along with the VCS document (PD). In the text it says that Social Carbon is still in development, so many social aspects of the project are not clear in the PD. It is said that more details will be given in the Social Carbon which is not available for evaluation. It would be interesting to be able to evaluate this other document in order to better assess how the public consultations with the community took place or will take place, as well as to verify the non-overlap with other GHG programs.

One point to be questioned is the choice of carbon stock. The proponent uses the carbon stock for “terra firme” forests from Higuchi's thesis (2015). However, this study was carried out for the state of Amazonas and did not consider forests in the state of Pará, where the Arataú Project is being developed. In addition, the phyto physiognomy classification of the area, according to the PD, is Low Land Dense Tropical Forest (95% of the area), different from that of Higuchi. In the Fourth National Communication there is value for this specific typology, based on the broad and complete study carried out for the Amazon Biome region.

Comparatively, the study by Higuchi (2015) says that “terra firme” forests have the following stock values: $C^{\text{aboveground}} = 163.7 \text{ tC/ha}$ and $C^{\text{belowground}} = 39.29 \text{ tC/ha}$. The Fourth Communication, in turn, presents the following stock values for the Low Land Dense Tropical Forest (>90% of the phyto physiognomy of the project area): $C^{\text{aboveground}} = 128.3 \text{ tC/ha}$ and $C^{\text{belowground}} = 39.8 \text{ tC/ha}$.

Since the data from Higuchi (2005) are not local, specific and recent data, what would justify its use and consequent increase of 20% in the carbon stock, in relation to the use of the Fourth National Communication?

Ownership and Project Proponents

Few descriptions are given of the social aspects, saying that more details are found in the Social Carbon Project. Therefore, it is important to reinforce that it must be linked to the PD for greater social detailing of the project.

The credit goes to Future Carbon, the sole proponent of the project. As presented in the text, the agreement made with the owner of the area granted this right to Future but we do not have access to the contracts to validate the details.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

Public consultation is said to have been made. But it would be important for the proponent to clarify whether the project consultation and reporting was done with the 20% of the population within the 20km radius of the buffer (as required by the methodology).

In item 1.18 it is said that the Social Carbon Report will only be developed during the first monitoring period, which is not clear if it has already been incited. That is, as throughout the PD the proponent cites the Social Carbon Report as a source to clarify various processes, approach and relationship with communities, it is not possible to assess these points in depth.

There is also a lack of clarity about benefit sharing. The PD mentions, vaguely, that they will bring benefits and build a relationship with the communities, but without clarity.

Other Comments

It would be interesting for the proponent to show that the property has only 73% of its Legal Reserve forested, that is, 7% less than what is regulated by Brazilian forest legislation and what legalizes this situation or what will be done to make it legal.

According to the VM0015 methodology, 100% of the Leakage Belt at the beginning of the project must be forest area and, apparently in Figure 10, there are areas called leakage that are not classified as forest. A clarification or correction of the figure would be interesting.

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.