

Submitted to: Verra

Project under public consultation: Rio Branco Grouped REDD Project (ID 4089)

Public consultation response

Rio Branco Grouped REDD Project (ID 4089)

[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 Rio Branco 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, Ecorescurities, 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 Rio Branco Grouped REDD Project is a REDD+ project that includes AUD and APD methodologies.

The additionality of the APD project is based on the conversion of forest into pasture for livestock and the sale of wood. This conversion is being guided by the Brazilian Forestry Code, where the landowner can suppress the Legal Reserve surplus. In the case of the property in question, which is located in the Legal Amazon, you can suppress up to 20% of the total area of the property, provided that you have the license to do so approved.

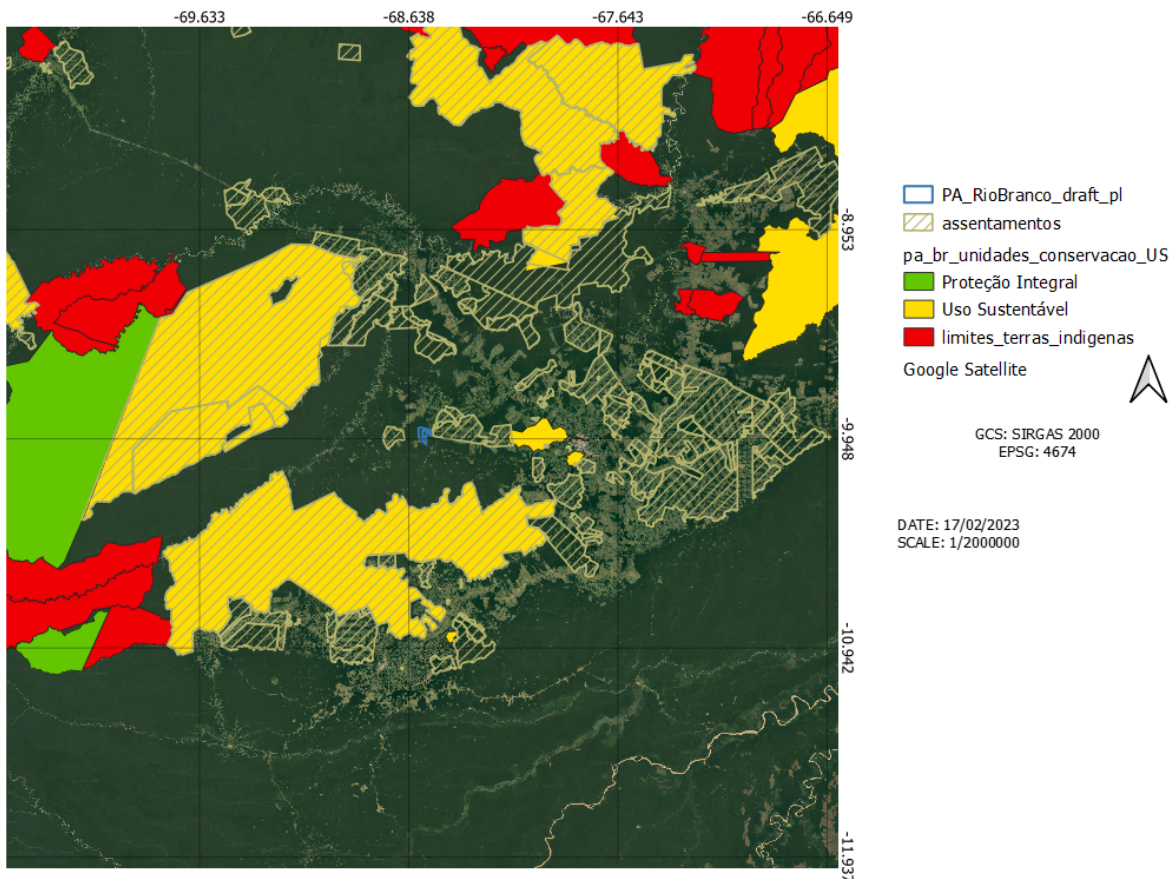
The Project Description mentions that the owner of the farm has the approved license, but it is not in the annexes for verification and evidence. One of the obligatory requirements for the vegetation removal license by IMAC (Instituto de Meio Ambiente do Acre) is the CAR (Rural Environmental Registry). The situation of the property in relation to the CAR will be explained in the next section.

For this APD (Avoiding Planned Deforestation) project, 07 proxy areas were chosen, but a map of these areas with their respective locations was not shown.

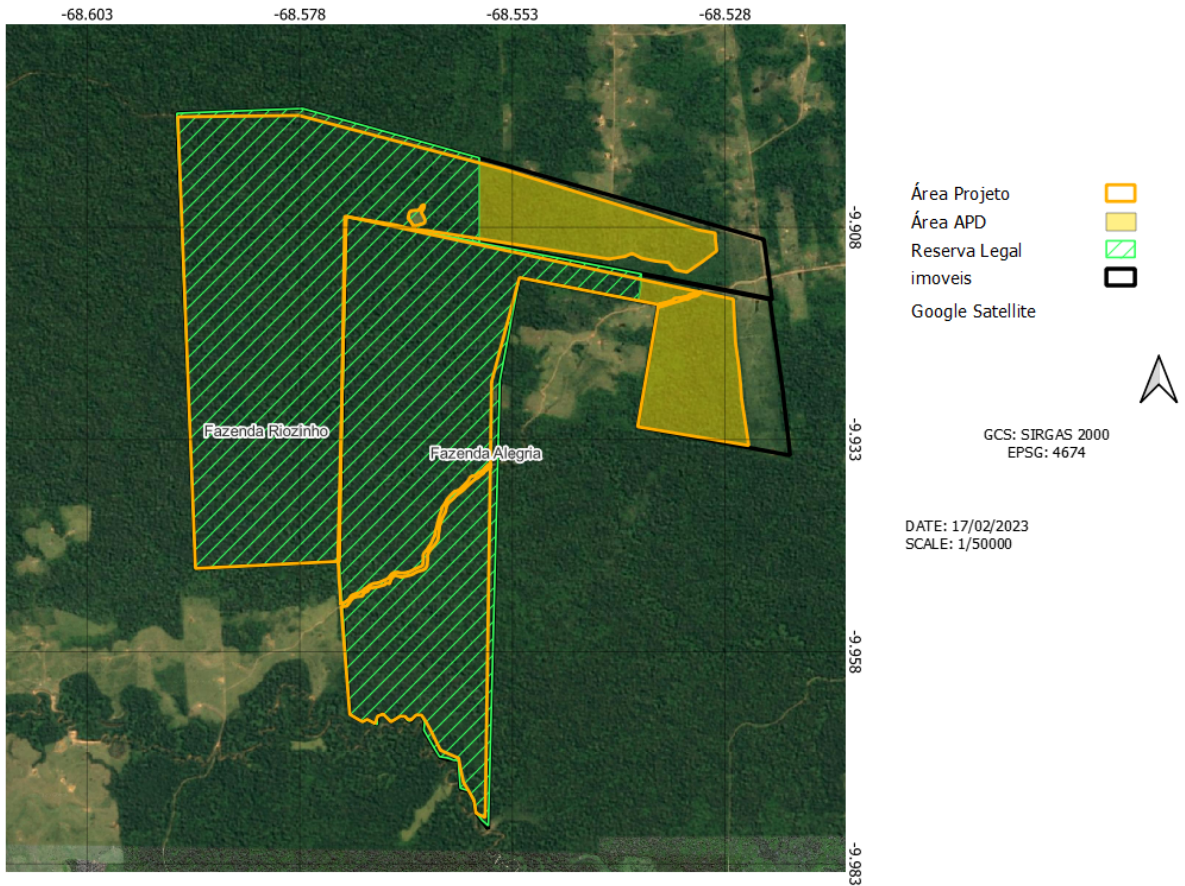
Ownership and Project Proponents

The Rio Branco Grouped REDD Project is a grouped project with two properties (instances), we did not have access to analyze the property registrations and certificates.

In spatial analysis, the project's Property does not intersect with Settlements, Conservation Units, Indigenous Lands and Quilombolas. They only share boundaries with a settlement as shown on the map below:



Below we have the representation of self-declared CAR data referring to the boundaries of the properties and the Legal Reserve, with the Project Area and the area for APD on the map below.

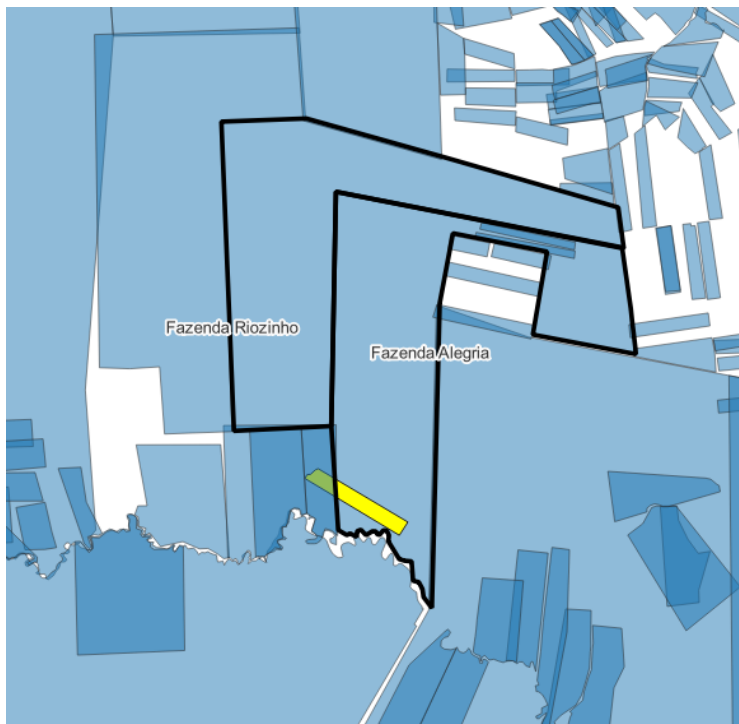


CAR EVALUATION

Both the limits of Fazendas Alegria and Riozinho are registered in the CAR respecting the proportion of Legal Reserve for the location of the Amazon Biome (80%). CAR property codes and information are listed below:

Name	COD_IMOVEL	Area (ha)	Status	SICAR Registration Date	SICAR Analysis Date
Fazenda Alegria	AC-1200401-9B67C502E4A945F9B30766960853306C	17,505	Analyzed with pendencies, awaiting presentation of documents	30/05/2014	14/10/2020
Fazenda Riozinho	AC-1200401-7A078C01C6C47318D6566D184766E74	17,498	Analyzed with pendencies, awaiting presentation of documents	02/06/2014	14/10/2020

There are no overlaps of other properties registered in SICAR, with the exception of a property (yellow) to the south in Fazenda Alegria with code: AC-1200401-9B67C502E4A945F9B30766960853306C.



Local Stakeholder Consultation and AFOLU-Specific Safeguards

The local bodies and entities that are mapped as beneficiaries and interested parties were presented, but they do not have evidence or comments on how the process went or on the meetings.

The plan for mitigating the risk of Non-Permanence is not clear. It is mentioned that educational work will be done with local communities, mainly in the area of leakage, but it does not make it clear exactly how it will be carried out.

Other Comments

It is not clear in the project who will commercialize the credits, it being understood that it will be the proponent (Future Carbon Group).

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.