

Submitted to: Verra

Project under public consultation: Altamira Grouped REDD+ Project (ID 4094)

Date of submission: 03/21/2023

Public consultation response

Altamira Grouped REDD+ Project (ID 4094)

[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 Altamira 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, Ecosecurities, Ekos Brasil, ERA Brazil, FAS, IDESAM, Impact Earth, MyCarbon, 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 methodology applied is eligible for the presented scenario. The additionality became plausible owing to the selected project area and all the information disclosed during the Project Description.

The principal drivers of deforestation are cattle ranching and timber harvesting. The deforestation rate in the reference period seems to be high (3.54%/year).

Map Biomes is the baseline database, however it is claimed that the mapping has been refined through algorithms in Google Earth Engine. Consistent with the data presented, they opted for the historical average approach in the baseline.

The secondary data were used for the carbon stock (Higuchi, 2015) are not local, specific or recent data. The inventories conducted by that source are from 2005 to 2010. This thesis was carried out for the state of Amazonas and did not consider forests in the state of Pará, where the Altamira Grouped Project REDD+ is being developed. The same issue was found in project ID 4084: the total carbon stock is too high (744 tCO₂/ha), due to the reference used.

The Altamira REDD+ Project includes trees between 5 and 10 cm DBH in the above-ground biomass estimate, increasing its value by 11%.

The Project also ignores the belowground biomass estimate reported by Higuchi (2015), in favor of a default value, increasing the belowground biomass estimate by 66%.

The Altamira REDD+ Project ignores the dry biomass-to-carbon conversion coefficients reported by Higuchi (2015), in favor of a default value, inflating the aboveground carbon estimates by 3% and belowground by 7%.

Dead wood carbon stock was not included.

Ownership and Project Proponents

The land ownership of the six properties included at the PD (Fazenda Fazenda Bedin I, Fazenda Bedin II, Fazenda Bedin III, Fazenda Bedin IV, Fazenda Bedin V and Fazenda Bedin VI) is attributed to Idivar Eugenio Bedin and Ilceu Jose Bedin. There is no mention to the document that demonstrates land ownership (CAR, SIGEF, Title) - which should be available only for the VBB involved. Without this information is not possible to understand if the land tenure is solid. **The Alliance strongly recommends that this information be provided from the public consultation phase of the project.**

As for the Proof of Title, regarding carbon credits ownership, it is defined by an agreement signed between Mr. Idivar Eugenio Bedin / Mr. Ilceu Jose Bedin and Future Carbon Holding.

As there are no local or traditional communities inside the project area, only the Project Proponent and the landowners will have the right to commercialize and possess the carbon credits.

The only clarity refers to an agreement between the landowner and Future Forest, which indicates that Future Forest has some kind of ownership of at least part of those credits, even though the right proportion to each part is not clear.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

The local stakeholders consultation activities have not been carried out, only the shallow description of future consultations. The future activities are described in a generalist way, non specifying or describing important factors to the social development of the communities affected.

The project proponent describes slightly the settlement of communication channels with the stakeholders, describing the project's own email like the main communication channel. But did not describe other communication channels, nor how they will implant communication channels with internet and technology destitute stakeholders.

The process of Identification, Description and Benefit Permanence of stakeholders was not carried out, although the procedures for that to happen in the future are briefly described in the PD.

No benefit sharing mechanism has been proposed yet. The methods of action from the point of view of communication, mitigation of impacts and safeguards are described superficially and generically. No photo, image, evidence or reference of applied methods is presented.

Other Comments

- a. The Project Description cites the creation of an ecological corridor but did not bring any specificity of how, where or when it will be applied.
- b. The VMD0015, v1.1. methodology has been applied, but VERRA already has newer and more advanced methodologies.
- c. All land documentation should be already available for the project planning and description, it brings a lot of uncertainties about the continuity of the project.
- d. 1.8 Project Start Date - The documents supporting the project start date will be made available to the auditors during the validation process. Therefore, we cannot analyze the consolidation of the project and the existence of the necessary documentation.

In general, the descriptions are superficial and generic, lacking analysis, data and more robust references. The PDD does not present an image in loco, only maps.

Finally, we emphasize the need to conduct data collection and primary studies in the project design phase, not just after obtaining revenue from carbon credits.

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**.