

Submitted to: Verra

Project under public consultation: REDD Carbonflor (ID 4117)

Date: May 12, 2023

Public consultation response

REDD Carbonflor

[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 **REDD Carbonflor** 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, Redda+, Re.green, Rioterra, South Pole, Systemica, 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 observed:

Project credits are under the management of ECCON (sole proponent), since the owners of the areas are not seen as proponents. The project is grouped in a region that encompasses the Amazon and Cerrado biomes. It is said that there is no dispute over the territory and that the owners of the three project areas have legitimacy over the area. Evidence has not been confirmed.

As for social actions, although some of the projects started in 2021, apparently few actions were carried out with the communities, only project presentation meetings and the beginning of an action development plan. It lacked a lot more details (clarity, methodology, processes, inventories, etc.) about the biodiversity plan. It would be very interesting for the proponent to include more details about all these aspects.

A relatively critical point to be evaluated is the argument of the Start Date. For example, in case the PA1 is the same for the APD scenario. The AUD must be revised, since the letter of intent to carry out the REDD+ project does not guarantee that actions to preserve unplanned deforestation (AUD) are actually being developed (only the intention was presented). That is, the use of the same start date for the APD and AUDD scenario should be

better justified and mainly evidenced with the occurrence of actions in the field for the preservation of forest integrity.

Finally, despite the methodology demonstrating that an assessment of the historical use of the area can be an indication that justifies the APD in areas with the possibility of legal deforestation, it is worth questioning this point. Historical pattern analysis may not be sufficient to guarantee that the area would be deforested (legally). An analysis of the financial and legal viability (in addition to the forest code) is needed to see whether this area could actually be deforested. We can mention, as an example, the logistical infeasibility of opening the area for cattle or agricultural cultivation. In addition, the area may be in a buffer zone of public preservation areas that limit commercial activity in the locality. In other words, it would be very interesting if the owners actually have a license or pre-project document that shows their clear intention to deforest. In the case of relying only on the historical pattern of use of the area, the proponent should broaden his analysis deeply into legal issues and financial viability of the proposed action in the baseline scenario since the information presented is superficial, which leaves space for a lot of questions.

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**.