

Submitted to: Verra

Project under public consultation: Itamarati Grouped REDD Project (ID 4141)

Public consultation response

Itamarati Grouped REDD Project (ID 4141)

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 Itamarati 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

In section 1.6 Project Eligibility it is described that "The project activity involves the conservation of native mangrove forest. This activity is eligible under the Brazilian law according to conditions set out in sections 1.14 and 3.5." However, there are obviously no mangroves in the region.

The criteria for including new instances are very generic. It is not clear the delimitation of the area of possible occurrence of new instances.

Approach (a): Historical Average was selected. According to the project proponents, this decision resulted in obtaining conservative values, as the regression analysis revealed a slight trend of increasing deforestation rate.

The baseline is consistent, but we have the following caveats:

1) The work that the project is based on to estimate carbon stocks (LUNARDELLI, Caroline. Influence of environmental and anthropic factors on the estimation of aboveground tree biomass in southern Amazonia. UFMT, 2016. Available at https://ppbio.inpa.gov.br/sites/default/files/Lunardelli_C_Dissertacao_2016.pdf) only presents final results.

2) That same work used a very generic allometric equation that uses only DBH to estimate tree biomass. Although this equation was developed for the region in 2008 (Nogueira et al. 2008), the use of specific equations (even if based only on DBH, if it is the only variable collected in the Lunardelli study) would give more accurate results than a generic equation of the same level.

Ownership and Project Proponents

Usinas Itamarati S/A is the owner of the 4 farms that make up the first instance. Documentation will be made available to auditors during validation. Based on the available documentation, we do not have subsidies to assess land irregularities.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

The document only lists the potential actors. It does not give details about the process and if it has already been carried out. Nothing that references an FPIC.

The PD does not cite the distribution of benefits and the risks and mitigation measures were described in a very generic way.

Other Comments

In general, the PD is quite generic, even making a mistaken allusion to mangroves, something that does not occur within the boundaries of the project.

Also, it is lacking specific information about consultation with stakeholders and addressing risks, for example. The reference source for carbon stocks is a master's thesis, where the data are closed and we were unable to do a cross-check.

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**.

