

Submitted to: Verra

Project under public consultation: Serenity Valley Project (ID 4142)

Date: 03/23/2023

Public consultation response

Serenity Valley Project (ID 4142)

[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 Serenity Valley 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.

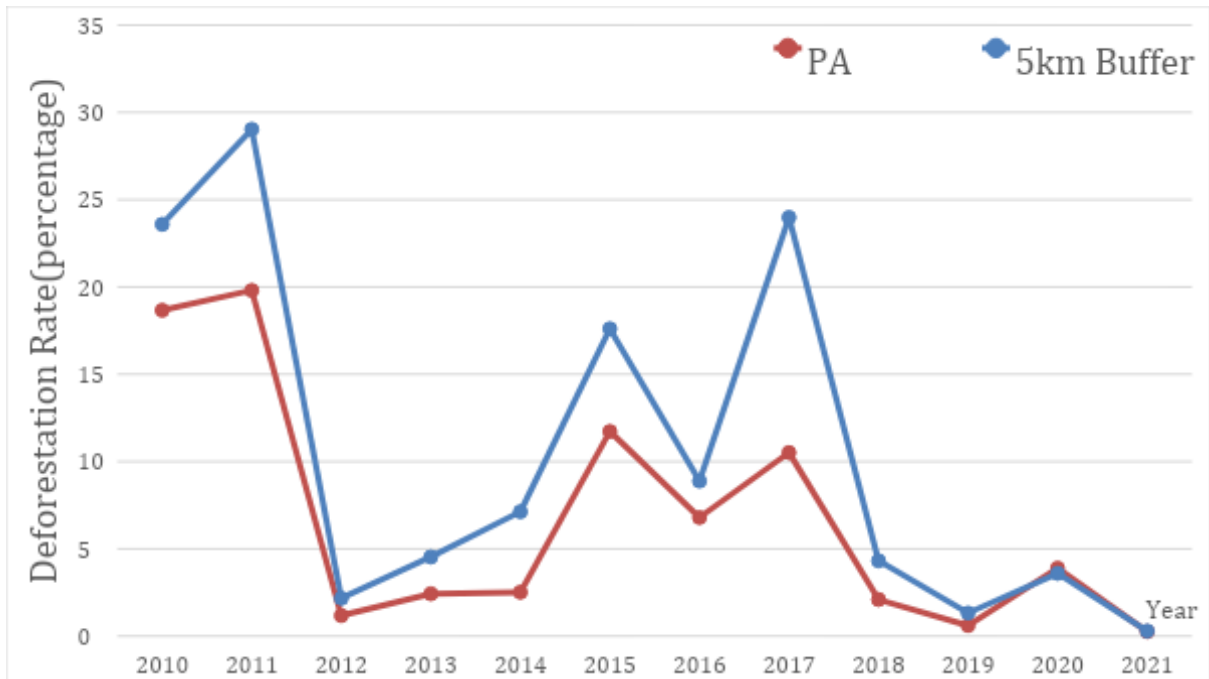
The following aspects contained within the Project Description were seen as concerns:

Methodology and Baseline

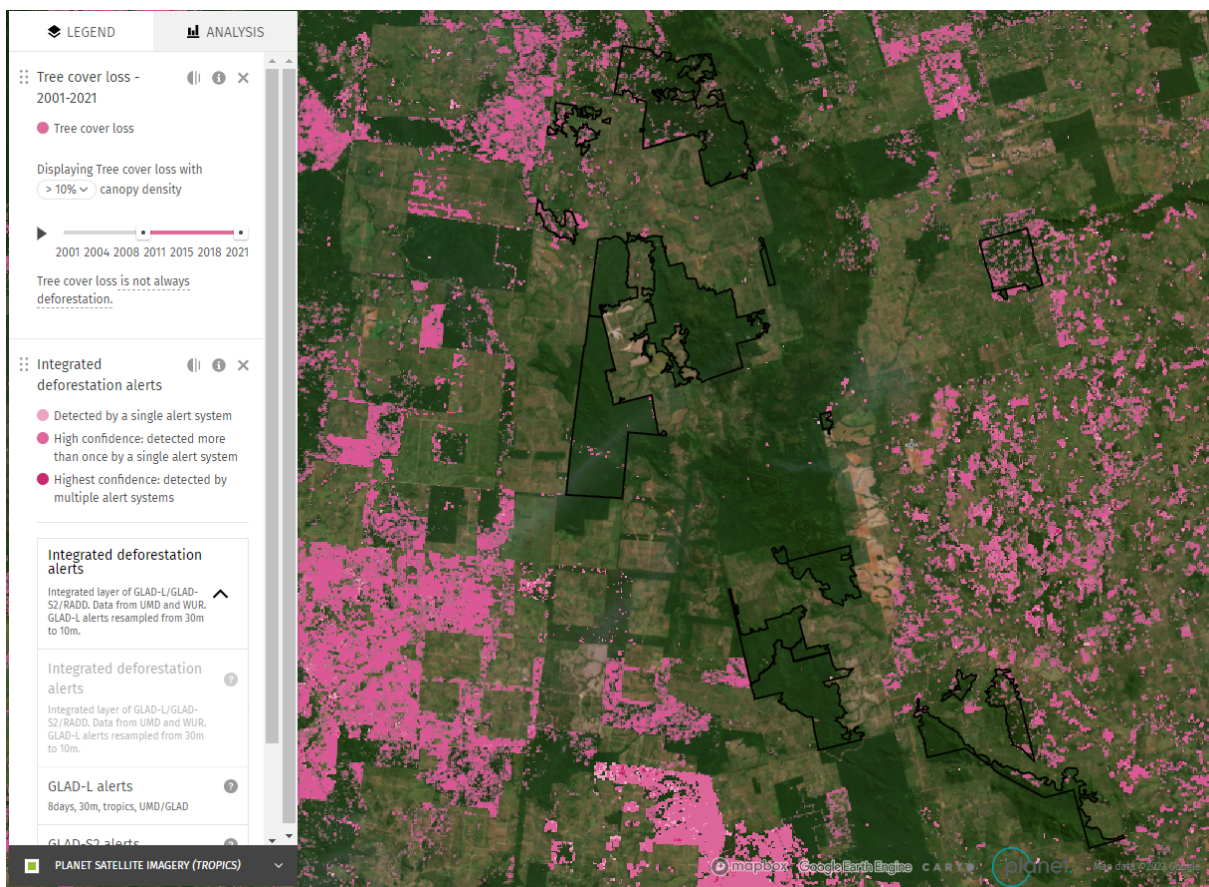
The PD has detailed description on the selection of methodology. The project adopts the approved VCS Methodology VM0015, additionally, VT0001, AFOLU Non-Permanence Risk Tool v4 are also used. The criteria of eligibility are justified in section 3.2. Approach A was selected for the baseline emission with justification.

One potential concern has been identified concerning the selection of project area and reference region through the deforestation trend analysis, which compares the yearly deforestation rate between project area and a 5km buffer around the PA. As the boundaries for the project are missing, a 5km buffer is created surrounding the project area, and it's also contained in the reference region. Therefore, it can reflect the deforestation trend of the reference region to some extent.

From the chart, we see throughout all 10 years (2010-2020) prior to project start, the deforestation rate in the 5km-buffer zone has been continuously higher than that in the PA, and after project start (2020-2021), although a deflection is witnessed, which means with the project interference, the rate in PA decreases and is still below the buffer, the statistics are not representative since the period is too short. Therefore, there's potentially a risk of cherry picking that the impact of the project might be biased and exaggerated.



Additionally, a forest loss mapping was conducted for further verification, see below.



From which it is clear that the project area is not overlapping with forest loss hot spots, but in the other way around. Therefore, if further justification is not provided, the selection of PA seems to be biased.

Ownership and Project Proponents

The ownership and project proponents are described clearly. It remains the question on documenting proof of ownership which as it says in the PD will be shown to auditors.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

- Stakeholder identification is done, but the process of identification and subsequent engagement is not clearly defined.
- Stakeholder category identification is rather generic than specific to those in the project area that would be impacted directly or indirectly by the project.
- How about the possibility for interested stakeholders to also have a say. These are other category types than those impacted directly by the project. One could look at them as any person, group of persons, or entity that has shown an interest, or is known to have an interest, in the activities of the project. The following are examples of interested stakeholders:
 - Conservation organizations, for example environmental NGOs.
 - Manpower (rights) organizations, for example manpower unions.
 - Human rights organizations, for example social NGOs.
 - Local development projects.
 - Local governments.
 - National government departments functioning in the region.
 - Experts on particular issues, for example High Conservation Values.

Regarding ongoing stakeholder engagement, the PD has clearly identified that this is useful. However, establishing only e-mail communication as a channel of communication might limit some stakeholders not able to communicate in this way.

It is important for effective stakeholder engagement to be assured that a comprehensive stakeholder engagement strategy is developed. Such a strategy should adapt to means appropriate to target stakeholders.

Other Comments

Safeguards against illegal activities in the project are not clearly defined. Also, the benefit sharing scheme is mentioned but not clearly explained.

The approach to describing project activities is generic in nature and gives little information as to what specific activities will be carried out. This makes it hard to determine that a responsible activity plan will follow that accounts for all the necessary socio-ecological aspects of a conservation project.

For example, what activities are in place to identify high conservation values that will be in project area, what activities are in place to ensure that damage is repaired or at least that

they are prevented for future occurrence, what activities are in place to guard against further harvesting of threatened and endangered species, what activities support local community livelihood etc.

A more specific description of the place that the project is found would be useful to know those that will be impacted by the project activities and so to design an effective stakeholder engagement process.

Regarding the issue with illegality, this has been explained in the PD as a major issue around the project area, but there is no clear strategy on how the Project proponent intends to address this in the project area. Given the importance, it would be worth outlining an approach to avoid illegal activities around the project area.

Description of the Environmental impact section should be more comprehensive and clearer. It should take into account aspects like

- assessment of project activities on the environment;
- protection of rare threatened and endangered species (flora and fauna) where they exist;
- protection of water courses, lakes, streams etc running through the forest.

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**.