

Submitted to: Verra

Project under public consultation: Urupianga Grouped REDD Project (ID 4143)

Date: 03/23/2023

## Public consultation response

### Urupianga Grouped REDD Project (ID 4143)

[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 Urupianga 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 information is complete and this project activity does not apply any methodology deviations, following the VM0015 requirements. The project is located in a region under pressure for both logging and cattle ranching offering risks to the conservation of the Project Area. The present Instance depends on the revenue from the VCUs to support itself and hence, it is additional.

Approach A was chosen as Baseline Approach, since deforestation rates measured in different historical sub-periods in the reference region reveal a low increasing trend and therefore, in order to be conservative, a constant historical average deforestation rate trend was utilized to project future deforestation. For the deforestation baseline, the average deforestation rate during the 2011-2021 period (0.91%/year). Average annual ERs is 76,993. The carbon stock was taken from secondary sources, including scientific references and IPCC defaults.

#### Ownership and Project Proponents

As a grouped project, there are 6 properties owned by multiple landowners. The PDD informs the land registry number (in Portuguese, "Matrícula"), without mentioning the Environmental Registry number (CAR) or INCRA documents.

## Local Stakeholder Consultation and AFOLU-Specific Safeguards

The project is not applying the CCB Standard. Nevertheless, a per VCS requirements, the Project Proponent has mapped all relevant stakeholders of the project and has conducted a Stakeholder Consultation. The documents seems to imply that there are no direct stakeholders (living inside the project area) and therefore an FPIC process was not required.

The project mentions that benefit sharing mechanisms will be discussed with communities through the stakeholder consultations. The project proponent conducted a risk mapping and has risk mitigation activities for every identified adverse activity.

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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**.