

Submitted to: Verra

Project under public consultation: Seringueira REDD+ Project (ID 4165)

Date: 25/04/23

Public consultation response

Seringueira REDD+ Project (ID 4165)

[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 Seringueira 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, Systemica, Sustainable Carbon and Volkswagen Climate-Partner, it is great to see new carbon projects being developed.

We observed the following aspects contained within the Project Description:

Methodology and Baseline

The applied methodology (VM0007 v1.6) is coherent with the project development.

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.

When defining the drivers of deforestation, on Section 2.2 it is defined as "cattle ranching". The baseline is coherent with the project objective and development.

The project proponent expects to reduce 1,054,735.42 tons of CO₂e in 30 years. Making an annual average, is expected to generate 35,157.847 VCU's per year.

Ownership and Project Proponents

The land ownership of the three properties included at the Project Description (Seringal Liberdade, Seringal Redenção e Seringal Deserto da Liberdade) is attributed to many

members of the Mappes family, more specific: Verusca Maria Montenegro Mappes, Laiz Maria Montenegro Mappes, Glauber Ueyke Montenegro Mappes, Sandra Magda Montenegro Mappes Costa, Sueli Magida Mappes Maia, Tania Mara Mappes Tavernard de Alencar, José Maurício Montenegro Barroso and Maria Alaíde Montenegro Mappes. The project proponent affirms that the lands are registered and certified by the Land Management System - SIGEF. In addition, the polygonal of the areas do not overlap with any other polygonal in the georeferenced registration in INCRA. The land tenure seems to be solid, but the auditors have to confirm all the information available.

As for the Proof of Title, regarding carbon credits ownership, it is defined by an agreement signed between Mappes family and Terra Vista Gestora de Recursos LTDA.

The development, implementation, monitoring and certification of the Seringueira project is the responsibility of Terra Vista Gestora de Recursos LTDA. The right to commercialize carbon credits is also under the responsibility of Terra Vista Gestora de Recursos LTDA.

Because there are communities highly influenced by project activities, a share of the amount from traded carbon credits should be available for these communities in the form of improvements and benefits.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

The local stakeholders consultation has been applied during the social surveys carried out during September and December of 2022 and January of 2023, on the communities São José, São Luiz, Campina, Açaituba, Deus é por Nós, Porto Mappes, and Tigre.

The future activities are widely described in a work plan that pretends to develop activities aimed at reducing the impacts caused by climate change and providing a better adaptation of the communities to climate change, in accordance to the communities needs.

The project proponent describes the settlement of communication channels with the stakeholders, with a permanent and instant channel of communication and consultation between project proponents and communities and other stakeholders via email. Besides, it's described that prior to each verification, communities and other stakeholders will be contacted and consulted personally for updates on project activities, results and grievances that may surge during the project implementation.

No FPIC document has been disseminated, whereas there is no community inside the project area.

The process of Identification, Description and Benefit Permanence of stakeholders was carried out, and during community consultations, information on the benefits brought to communities through the project was provided to community members. The activities are planned to improve the quality of life and make a positive impact. In addition, the project will not bring direct or indirect risks to the communities or to local resources.

With all information presented, it seems to be evident the lack of impact on stakeholders. Free community access to the area for the extraction of non-timber forest products was established, trying to create a good and productive relation between the project proponent, the landowners and the communities that are influenced by the project, providing the strengthening of the ways of life of local traditional communities and their economic production.

Other Comments

Referring to the size of presented properties, on section **2.5.1 - Statutory and Customary Property Rights**, the values presented are too far from the reality described during the PD. Adding all property sizes, the result is only 14~15 hectares. Furthermore, the numerical separators are confusing in the description of the properties.

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**.