

Submitted to: Verra

Project under public consultation: Seringueira II REDD+ Project (ID 4221)

Date: April 28, 2023

Public consultation response

Seringueira II REDD+ Project

[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 II 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.

The following aspects contained within the Project Description were observed:

Methodology and Baseline

Start date: According to VCS Standard V4.4, 2023, Start date of an AFOLU project is the date on which an activity led to reductions or removals of GHG emissions.

The project in question considers as its start date the request for georeferencing for land and environmental regulation of properties, aiming at regulating the property for the development of forest preservation projects. The request was made by one owner (out of the nine existing owners). This land regulation alone would not be evidence that demonstrates the beginning of the GHG reduction. In addition, carrying out activities in this sense would already be a necessary activity to maintain regular ownership over the area, not being something additional to the development of a preservation project.

Additionality: The project presents as a possible scenario for the change of land use to pasture for raising beef cattle, with more than 98% of occurrence in the RR and a growth of pastures in the municipality in 2022. Based on the data, it demonstrates additionality, but it would be interesting to have more data available on the scenarios, to also strengthen the argument for the choice of scenarios.

The construction of the baseline was based on the historical average (approach A), with an average rate of 0.39/year. The projection is 1,914 hectares of deforested area by July 2050. In the PD there is no clear justification for choosing approach A. The average rate is

assumed. For the VM0007 methodology, cited by the authors as the basis for choosing the approach, the justification is based on linear regression. If the R^2 is <0.75 , the average rate should be adopted; otherwise, the variable mean should be adopted. However, the spatial allocation of deforestation seems coherent. The PA area is 16,483.02 ha. The generation of VCU for the first year of the project is estimated at 21,829.49 tCO₂e and for 2050 estimated at 654,884.56 tCO₂e. The net emission reduction by the end of the project is 591,917.73 tCO₂e. It is not possible to verify whether the baseline is overestimated because historical deforestation data is not available.

Ownership and Project Proponents

Owners: There are seven properties: Redenção, Liberdade, Deserto da Liberdade, São José, São Luiz, São Raimundo and São Vicente. And the Owners are: Verusca Maria Montenegro Mappes Costa, Glauber Ueyke Montenegro Mappes, Sandra Magda Montenegro Mappes Costas, Sueli Magida Mappes Mais, Tania Mara Mappes Tavernard de Alencar, José Mauricio Montenegro Barroso and Maria Alaíde Montenegro Mappes, referred to as "Mappes Family" . Banco do Brasil enters like others involved.

Governance: Terra Vista is responsible for the coordination and execution of socioeconomic and environmental diagnoses, for the studies of carbon stocks and baseline, elaboration of the document (PD), monitoring and implementation of the proposed activities, assistance in validation audits and verifications and in the commercialization of generated credits. There is no data on credit allocation.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

Theory of change: the ToC of the project is based on the 1) Maintenance of forest cover; 2) Biodiversity conservation; 3) Improvement of quality of life and technology transfer. However, the main goals of the project are not presented and how these can be achieved through robust planning and actions. The fragilities, the outputs and outcomes are not clear. The chart illustrating the Theory of change is not available. Since the main goals are not clear, and the ones presented are general, the benefit permanence is also unclear and can be seen as a risk to the project permanence.

Biodiversity: The data presented in the PD is secondary, since the local inventories have not been carried out yet. HCV1 is correct, however there is an error in the HCV 3 - Protected and priority areas for conservation (it is not HCV1). It would be important to have a map showing the overlap with the MMA priority areas mentioned by the proponents. Actions for biodiversity: indirect (monitoring to prevent deforestation) and direct (environmental activities with communities and fauna and flora inventories = it is not clear how scientific knowledge will be produced. It is not clear how the publication of these data will take place. We wonder who will be responsible? In contact with which scientific institute/organization?) Monitoring: the biodiversity monitoring campaigns will be annual, as well as the annual remote monitoring with satellite images (it is not clear if the remote monitoring will occur only once a year. Would that be effective? Which actions will be taken in case of land use change?). The project is eligible to achieve the gold criteria for biodiversity because of the endangered

species present in the region however, how will the project enhance their population trend effectively? Although the methodology does not state limits and activities to become gold, the activities proposed should address directly the endangered/critically endangered species and enhance their population trend. The activities to conserve biodiversity could be strengthened and are not specific to guarantee the enhancement of the population trend of all these species. The monitoring of biodiversity should be improved. Without biodiversity monitoring, the project could not be considered CCB.

Other Comments

The presented start date (property regularization) does not comply with the methodology, since to define the start date it is necessary to have evidence that protection actions are being effectively carried out in the field. Just having the legal issue settled does not guarantee that actions are being taken to maintain forest integrity, that is, it is not enough to support the start date.

The additionality of the project presented in the PD is not clear. It is important that bidders provide the source of the data being used for the calculation of financial additionality. For example: it does not say where the average cost and revenue values for cattle production in the region were taken from, nor for any other economic activity that makes up the local BAU. We are aware that the analysis is not publicly released, but the data sources with which the additionality analysis was done should be well described in the PD.

In general context, for the most part, we believe that each topic addressed considers what must be described in a succinct way. However, there are points to be observed.

Attention points:

- 1) The way of communicating with the communities needs to be revised. Thinking about accessibility, transparency and transmission of content;
- 2) The governance of the project is not clear in relation to the roles and responsibilities of all entities involved;
- 3) One of the project's proposals is to make the communities available on the internet, however, within the text there are excerpts that say that the process took place via the internet, which brings a point of confusion to the existence of internet access in these places.

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**.