

Submitted to: Verra

Project under public consultation: Sepoti REDD Project (ID 4263)

Date: April 28, 2023

Public consultation response

Sepoti 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 Sepoti 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

During our analysis of the design and methodologies used, we did not find any significant differences. The criteria used seem adequate. In our opinion, the information presented is sufficient. According to the information presented in item 3.5 on pages 80 to 84, the project is additional.

The approach used is A - Historical Average, as shown on page 91. The baseline is consistent and was based on studies on the historical trend from 2011 to 2021, with an average rate of 0.85%/year. About the generation of VCUs/year, see chart 55 on page 146.

Ownership and Project Proponents

Owner is Mr. Luiz Marcelo Carvalho. As verified on the Qgis platform, the project area is not a settlement. There is an organizational structure on page 166, stipulating the responsibilities of Future Carbon and the landowner. According to the PD (page 75), there are signs of social conflict in the region, mainly land conflicts (land tenure) in the reference region, but which do not apply to the project area.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

As mentioned on page 42, consultation with local stakeholders will be carried out through a project summary presented to communities and other stakeholders in Portuguese. We could not locate the FPIC document as there are no communities within the project area.

According to the PD (page 4) it is expected that the Sepoti Project will be able to expand the monitoring of the area, in addition to the ecological benefits and carbon sequestration. Part of the credits will be used to improve socio-environmental conditions in the region, contributing to the control of deforestation, aiming at spreading environmental awareness, generating alternative sources of income and educational actions. The risks, potential impacts and how the project will mitigate those are shown in table 3 - Project Risks, pg. 41.

Other Comments

We identified several inconsistencies using references to the state of Mato Grosso in different items between pages 40 to 136, when the project actually takes place in the state of Amazonas. For example: Item 1. Project Details - 1.14 Compliance with Laws, Statutes and Other Regulatory Frameworks / Item 3. Additionality - Step 4 Common Practices Analysis / and in all citations of State Legislation the state referred to is Mato Grosso. It is necessary to correct them and update the PD with information from the State of Amazonas.

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**.