

Submitted to: Verra

Project under public consultation: AMAZON PARTNERS 1 (ID 4391)

Date: July 4, 2023

Public consultation response

AMAZON PARTNERS 1

[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 AMAZON PARTNERS 1 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 with 25 members including Agro cortex, Bioassets, Biofílica, Biofix, BR Carbon, BVRio, Carbon Credits Consulting, Carbonext, Conservação Internacional, Eco securities, Ekos Brasil, ERA Brazil, FAS, IDESAM, Impact Earth, MyCarbon, Radicle, Redda+, Re.green, Rioterra, Systemica, South Pole, Sustainable Carbon, Volkswagen Climate-Partner and WayCarbon, it is great to see new carbon projects being developed.

The following aspects contained within the Project Description were observed:

Methodology and Baseline

The AMAZON PARTNER 01 project is a REDD+ AUD project based on the VM0015 Methodology for Avoided Unplanned Deforestation, v1.1.

The additionality of the project is based on the conservation of the forest under the allegation that the Project area, the projected increment of deforestation was 3,379.6 ha between 2022 and 2051, with an average of 112.65 ha per year.

REFERENCE AREA:

It is not clear in the document the explanation of the delimitation methodology of the Reference Region, as well as the leakage area.

According to the three possibilities proposed by the VM0015 methodology of the VERRA standard, the deforestation rate modeling approach “c”, was adopted.

The “c” modeling approach, which uses the historical rate, was chosen to forecast future deforestation and project baseline annual deforestation areas in the region in question. To calculate the annual deforestation area in the baseline of year “n” in the reference region, the equation of methodology VM0015 version 1.1 was used.

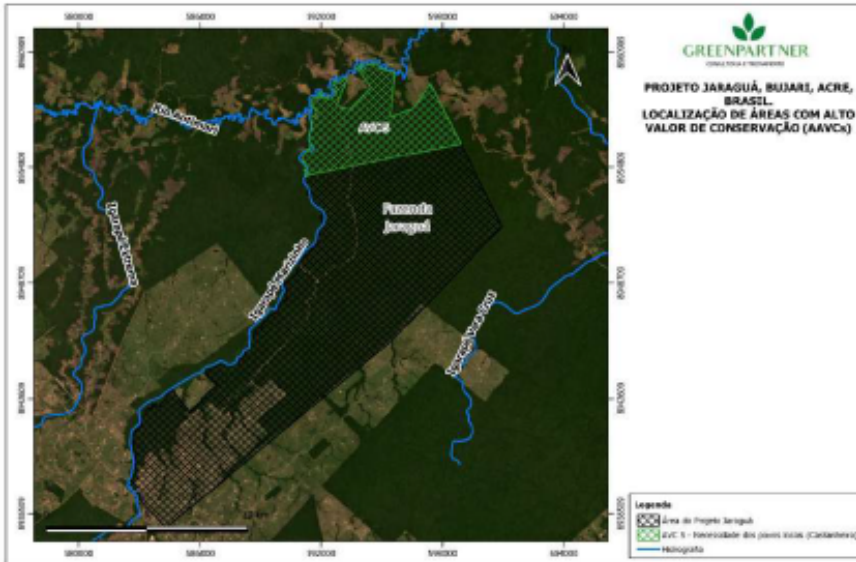
Within the scope of this REDD+ Project, the projection period comprises the time interval between 2022 and 2051, and the hypothesis adopted is that the annual rate of deforestation observed between 2011 and 2021 will follow the same pattern. This approach makes it possible to assess the magnitude of deforestation and the effectiveness of the actions proposed by the project in reducing deforestation rates in the region.

YEAR	Estimated reductions or removals of GHG emissions (tCO ₂ e)
2023	43.869
2024	13.211
2025	0
2026	12.570
2027	0
2028	42.711
2029	0
2030	25.767
2031	8.788
2032	30.492
2033	42.238
2034	18.023
2035	29.043
2036	50.881
2037	35.155
2038	17.769
2039	31.789
2040	41.759
2041	75.203
2042	65.794
2043	38.143
2044	48.306
2045	82.117
2046	30.303
2047	74.687
2048	14.453
2049	26.321
2050	63.871
2051	122.498

TOTAL	1.085.761
Number of years	30
Annual average	36.192

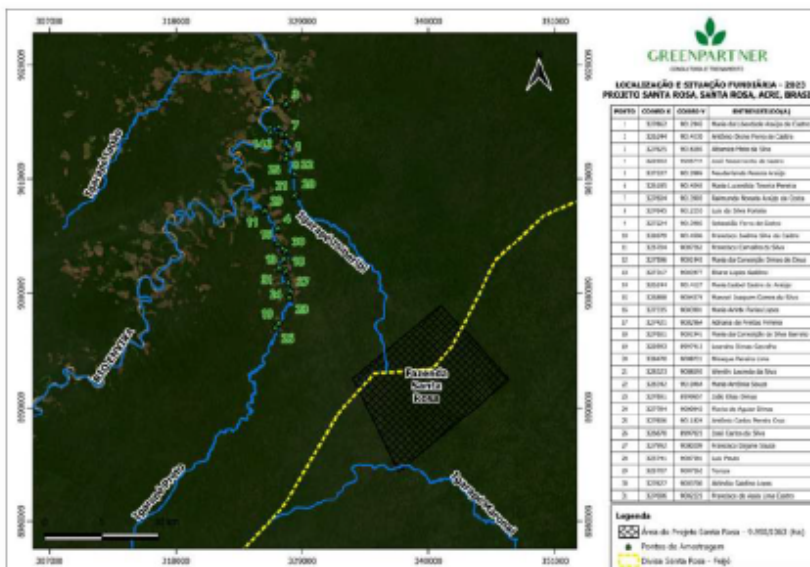
In the case of a grouped project of 3 areas, it is not clear whether a single index was used and extrapolated to the 3 areas or one for each area. This clarity is important, as the 3 areas have different characteristics and different deforestation pressures:

Jaraguá Farm



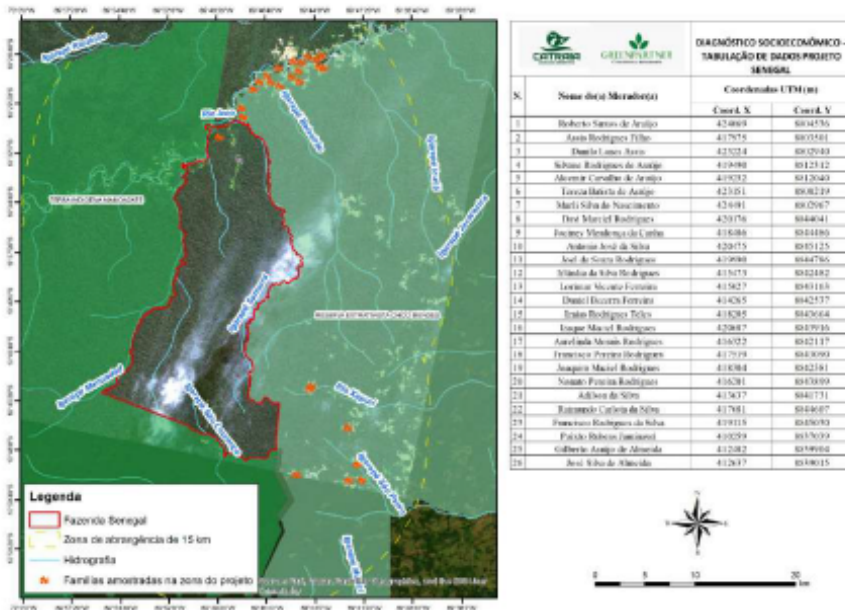
Source: Project teams' elaboration.

Santa Rosa farm



Source: Project teams elaboration.

Senegal farm



Source: Project teams elaboration.

Ownership and Project Proponents

AMAZON PARTNER 01 is a grouped project consisting of 3 areas.

The ownership of Santa Rosa farm is attributed to Mr. Sérgio Sebastião de Barros, through land regularization according to available Brazilian documentation, issued by the Registry of Sena Madureira, State of Acre.

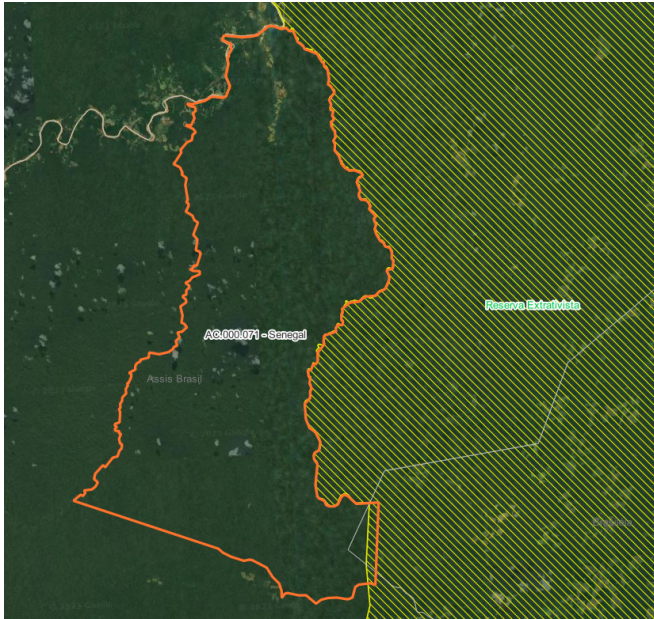
At Jaraguá farm, ownership of the land is still attributed to Mr. Sérgio Sebastião de Barros, through the land regularization of the Fazenda Jaraguá property, according to available Brazilian documentation, issued by the Civil Registry of the City of Bujari, State of Acre.

In the Senegal farm, ownership of the land is assigned to Mr. Jorgenei da Silva Ribeiro, through the land tenure regularization of the Senegal property, according to documentation available in Brazil, issued by the Registry Office of Sena Madureira, State of Acre.

Proof of entitlement is defined by signed agreements between Amazon Partners, LLC., Infrapar Sustentabilidade Ltda., and the owner.

We did not have access to analyze the registrations and full content certificates of the properties that make up the project.

The Senegal farm property has an intersection of approximately 300 ha with the UC Sustainable Extractive Reserve Chico Mendes as shown in the figure:



As described in the PD itself, there is an indigenous family identified as Paixão Rubens Jaminawá living within the Project Area. They declare themselves in possession for approximately 6 years and own an area of approximately 100 hectares. For family subsistence, among others, it carries out hunting and fishing in the Project Area. However, no ownership document was presented by the family.

CAR EVALUATION:

Below is a comparative table of the situation of the Farms in relation to the CAR:

Farm name	Santa Rosa Purus Farm	Senegal farm	Jaragua Farm
County	Santa Rosa do Purus - AC	Assis Brasil - AC	Bujari (AC)
CAR Code	AC-1200435-5E04B1A81 F304DD48E729196B7B0 C1D7	AC-1200054-3155A590127B4CEB B6D9DA6C2CF08655	AC-1200138-FE9B6029E5864D1 287295C20883C54C5
SICAR Registration Date	08/24/2021	09/30/2021	10/20/2014
CAR Analysis Date	NOT ANALYZED	03/29/2023	11/08/2022
Rectification date	NOT RECTIFIED	NOT RECTIFIED	03/03/2023
Area (ha)	9.957	32.842	15.687
SICAR areas with overlap	2	1	10
CAR Registration Status	Active	Pending	Active
CAR Registration Condition	Awaiting Analysis	Analyzed, awaiting response to notification	Awaiting registration
PRA	Joined out of date	Out of the deadline	Yes

Status RL CAR	Not analyzed and not vectorized	Not analyzed and vectorized	Not analyzed and vectorized
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It is observed that there are some points of attention to be regularized with the CAR, such as the non-demarcation of the Legal Reserve of the Santa Rosa farm. Another detail is the pending registration of Senegal farm. It is also noted the presence of other CAR registration polygons intersecting the project polygons.

It is not clear in the project who will commercialize the credits and the percentages of each part. As described in the PD, the information is confidential and will only be available to regulatory bodies.

Local Stakeholder Consultation and AFOLU-Specific Safeguards

In the project, all stakeholders were described according to each of the 03 properties. They mentioned meetings and meetings for engagement, but the minutes were not made available and not even if all representatives of each stakeholder group were present.

This Project proposes that the areas play the role of catalysts for territorial development, engaging communities and stakeholders to protect the areas and develop productive activities with sustainability, such as collecting Brazil nuts in the Jaraguá area, for example. With this, the proposal to improve the quality of life of the communities and protect biodiversity (also based on the monitoring plans to be implemented), will reinforce the role of these areas as important elements of protection of the Amazon Forest, and may serve as a model for other initiatives .

Other Comments

No additional comments at the moment.

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**.