

Submitted to: Verra

Project under public consultation: Symbiosis Continuous Cover Forest Project (ID 4592)

Public consultation response

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 Symbiosis Continuous Cover Forest 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 27 members including Agro cortex, Bioassets, Biofilica Ambipar, Biofix, BR Carbon, BVRio, Carbonext, Conservação Internacional, Eco securities, Ekos Brasil, ERA Brazil, FAS, Geonoma, IDESAM, Impact Earth, Infrapar Sustainability, Mombak, 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

Section 1.1 Summary Description of the Project: according to template v4.2, this section should have included the following: i) A brief description of the scenario existing prior to the implementation of the project; ii) An estimate of annual average GHG emission reductions and removals; iii) Complete the table with the duration of crediting period in the VVBs line. The Project Proponent should ensure that this section provides the necessary details as per the template, including the pre-project scenario description, GHG emission reduction estimates, and completion of the crediting period duration table.

Section 1.3 Project Eligibility: There's a link error to the AR-ACM0003 reference. Correct to the following [link](#). Also, in table 1 at the following eligibility requirement: "Eligible ARR projects may include timber harvesting in their management plan. The project area shall not be cleared of native ecosystems within the 10-year period prior to the project start date", the Project Proponent should explain the section where this is described and the management plan is referenced.

Section 1.11 Description of the Project Activity: In this section, the Project Proponent should indicate the source of data for each corresponding data point, such as IMA and volume in table 5, and clearly present the source of the data used in table 7.

Section 1.12 Project Location: The Project Proponent should reference KML files containing all the boundaries for the grouped project, as required by section 3.11.1 of VCS Standard v4.4.

Section 1.14 Compliance with Laws, Statutes and Other Regulatory Frameworks: The Project Proponent should provide clarification regarding any potential overlap between the project area and legal protection areas.

Section 1.17 Sustainable Development Contributions: It is not evident that provisions are included to monitor and report the project's contributions to the SDGs. The Project proponent should review this section according to: Requirement section 1.17 of the template v4.2: "Describe how the project contributes to achieving any nationally stated sustainable development priorities, including any provisions for monitoring and reporting the same." And also Requirements 3.17 of VCS Standard.

Section 3.3 Project Boundary: In accordance with section 3.3 of the template v4.2 and requirement 3.15.5, 3.15.7 of VCS Standard v4.4, the potential for leakage shall be identified for AFOLU projects, therefore, it will be associated with leakage belts. This is not evident in the evaluation presented in this section. The Project Proponent should provide the said evidences, as required by section 3.3 of the template v4.2 and requirements 3.15.5 and 3.15.7 of VCS Standard v4.4.

Section 3.5 Additionality: It is not evident that compliance with the legislation related to the legal protection areas is supported, which requires that they must be areas with protected vegetation, that is, if there is reforestation and/or restoration in these areas it would be because the legislation allows it demands. The Project Proponent should provide support for compliance and present legal evidence demonstrating that the proposed project activity meets the necessary legal framework.

In the Regulatory surplus section the Project Proponent should provide legal evidence proving that the proposed project activity meets the conditions; and present evidence of how the areas in which ecological restoration and recovery of areas protected by law will take place meet the legal conditions, including references to the appropriate legislation.

In Sub-step 1a. Identify credible alternative land use scenarios to the proposed project activity the Project Proponent should focus on identifying and specifying the scenarios on the basis of appropriate records and documentation, rather than describing the barriers related to them, as provided for in paragraph 10 of the Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities (Version 01). We also recommend providing a more detailed presentation and elaboration of Scenario 3.

In Sub-step 1b. Coherence of credible alternative land use scenarios with applicable mandatory laws and regulations the Project Proponent should demonstrate with the appropriate legal evidence the credibility of each of the scenarios identified, as provided for in paragraph 12 of the Tool Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities (Version 01).

Ownership and Project Proponents

Section 1.7 Ownership: There is no explicit discussion of the land ownership situation in the new areas that will host any of the proposed activities. The Project Proponent must clarify land ownership issues, especially those concerning the expansion plan.

Given that the project will involve multiple areas and landowners, the Project Proponent must clarify the entities involved that are entitled to the credits generated by the project (project rights).

Local Stakeholder Consultation and AFOLU-Specific Safeguards

Section 2.2 Local Stakeholder consultation: The Project Proponent should address the following issues related to local stakeholder consultation in accordance with template v4.2:

- Ensure that the communication processes encompass topics such as the risks, costs, and benefits of the project.
- Although the section describes worker regulations, there is no evidence that these regulations have been effectively communicated to stakeholders; the Project Proponent should provide evidence of this communication.
- Include communication about the validation process and the site visit that will be carried out, ensuring that stakeholders are informed about these critical aspects of the project.

Section 2.3 Environmental Impact: Measures to control or minimize possible negative effects are not described (mechanical and chemical practices, wood removal, use of the non-native species, etc). The project proponent should describe them better, as required in section 3.18.17 of VCS Standard v4.4.

Other Comments

Section 5.2 Data and Parameters Monitored: The Project Proponent should indicate the area of the sampling unit, as per the monitoring plan, for the data labeled as Aplot,i.

Section 5.3 Monitoring Plan: The Project Proponent should ensure that the following requirements, as outlined in the template, are described in the monitoring plan:

- The procedures for handling non-conformances with the validated monitoring plan. Provide a clear outline of how non-conformances will be addressed.

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 Coordinator, Carla Zorzaneli**, at nbs@nbsbrazilalliance.com.