



**Comments received by Verra during the public comment period 06 July – 05 August 2022  
for the validation of the Western Amazon REDD+ Grouped Project (project ID 3141)**

CCB Standards Third Edition

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**Comment 1**

Date: 05 August 2022

Sent by: Victor Ferraz

Organization: nbs@nbsbrazilalliance.com

Country: Brazil

Comment:

The following aspects contained within the Project Description were seen as concerns:

**Methodology and Baseline**

Overall the project meets the methodological criteria of VM0015.

**One important critical point is the fact that the start date is 01/01/19 and the project was listed in VERRA 04/29/22 (more than three years post start date)**

In relation to the baseline the reasoning is coherent, but the deforestation projection map for the PA over the longevity of the project (30 years) is missing.

The estimated average generation is 354.847 VCUs, with a production factor of 5.9 VCU/ha/year, consistent with the presented stock of 569.50 tCO<sub>2</sub>e/ha.

**Ownership**

In the reference region there are protected areas, indigenous reserves, and agrarian reform settlements. The project area does not overlap with protected areas and the project describes the laws in relation to the proximity in these areas. The land owners in the project area are private and have official possession of the land, with proven documentation approved by the Brazilian land authority and registrations in registry offices (CCIR, Certificate of Real Estate Registry, Certificate of Full Title, Georeferencing of the areas). It would be very important to present for the VVB the chain of custody of each property in order to prove the legitimacy of the ownership and avoid possible land grabs.

**Project Proponent(s) e Other Entities Involved in the Project (VCS/CCB)**

It would be interesting, already in the DP, for the proponent to present the improvements that the project intends to bring to local communities in general regardless of labor relations, especially considering that it is a CCB project. The DP mentions the intention of bringing this relationship closer in the future but, being a CCB, it would be interesting to have a more objective approach to this process.

**Local Stakeholder Consultation (VCS)/Free, Prior and Informed Consent (CCB)**

The set of WARG Project Stakeholders involves landowners, communities and public officials. In June 2021, the first stakeholder identification visit was conducted. In this



fieldwork, meetings were held with the group of public or private agents, in order to identify the potential for partnerships for the development of the project. In August 2021, a local consultation visit was carried out with the communities and landowners, in which participatory workshops were held to survey local demands and direct future activities. The local consultation process was based on social methodology to identify the problems, strengths, and weaknesses of the community and its place. The didactic expositive activities were carried out with explanations about what a REDD project is and its concepts. Participatory maps were also made with the community, so that people could put on paper how they see and experience their place of work and residence. It is important to report in the PD the percentage of the PA internal community within the 20% radius that was consulted and informed of the project. The number (and where they are from) of people consulted is not clear.

#### **AFOLU-Specific Safeguards (VCS)/Stakeholder Identification, Description and Benefit Permanence (CCB)**

The main beneficiaries are the landowners. The project expects to bring benefits to the local communities, public and private agents that have a relationship with the project, and the project management partners.

#### **Other comments**

The project only presents the generation projection for the first 10 years. One might expect generation to be presented for all 30 years of the project, or even for the first 6 years before the first baseline revision. However, these values being only for 10 years does not make much sense.

Another interesting point would be for the proponent to make clearer what the area of the PA is (59,959) throughout the text, since the focus is on the projected area of deforestation (6,188ha).

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, Victor Ferraz**, at [nbs@nbsbrazilalliance.com](mailto:nbs@nbsbrazilalliance.com)

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