

Responses to the Public Consultation of the Brazilian Voluntary Carbon Market Initiative on the proposed mechanisms to unlock the Brazilian VCM

The Brazilian Voluntary Carbon Market Initiative received several comments in its consultation on the proposed mechanisms to unlock the Brazilian VCM and makes them available in an original format in this document.

Does the document contain:

Comment Number

Who submitted it and which institution

What question does he refer to

Comment content

#	Comment submitted by	Institution	Reference question description	Comment
1	Mario R. A. Lewandowski	AGBI	Do you agree with the proposed mandate of the Brazilian VCM Council? (please, refer to pages 20-21 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) - Selected Choice	The composition of the consultation group is not clear.
2	Victor Ferraz	Aliança Brasil NBS	Is the structure of the Brazilian VCM Council adequate? (please, refer to pages 22-27 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) - Partially agree (please comment) - Text	It is unclear whether and how they intend to receive input from organizations and people outside the formal structure presented. Would this be the role of the Consulting Group? How would this be done? On the composition of the Board, we consider that there is an over-representation of theoretical experts, belonging to the Academy, NGOs, etc., with little knowledge and market activity. There is also no mention of government representation or interaction. Although we agree with the need to ensure independence from regulatory institutions/bodies and/or other agendas, it is important to have a dialog and exemplify how this will happen within this structure.
3	Raul Brum Manzoni Junior	Advocacia Ambiental	Is the structure of the Brazilian VCM Council adequate? (please, refer to pages 22-27 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) - Partially agree (please comment) - Text	I think there should be a greater participation of NGOs (Oscip) and private legal entities that act in the carbon market.
4	Fernando Couto	KAAETAMA	Is the structure of the Brazilian VCM Council adequate? (please, refer to pages 22-27 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) - Partially agree (please comment) - Text	I understand that not only companies that participate in this market should be part of it, but also the owners of land/carbon offsets
5	Mariana Gracioso Barbosa	re.green	Is the structure of the Brazilian VCM Council adequate? (please, refer to pages 22-27 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) - Partially agree (please comment) - Text	In representation, it is important to determine a minimum number of representatives from natural based solution project developers, given the carbon credit generation potential in Brazil. It is also necessary to take into consideration as criteria for participation the gender, race and diversity cutouts in the representation of the Board. It is not clear how the BoD and other instances will be elected: who votes are the institutional sponsors? who chooses the consultation group? We understand that this process should be more open and include the other participants.
6	Atta Oraee	Atkins	Do you consider adequate the structure of the Board of Directors (number of chairs, appointment method and term)? Please provide specific perspectives and suggested adjustments	Separating the Board of Directors into market dependent and/market independent actors ensures comprehensive coverage
7	Mario R. A. Lewandowski	AGBI	Do you consider adequate the structure of the Board of Directors (number of chairs, appointment method and term)? Please provide specific perspectives and suggested adjustments	Yes. The discussion and governance to prevent conflicts of interest will be crucial, but the model seems good.
8	Victor Ferraz	Aliança Brasil NBS	Do you consider adequate the structure of the Board of Directors (number of chairs, appointment method and term)? Please provide specific perspectives and suggested adjustments	Partially. We consider it pertinent to decide that the Independent Members are the majority, however the minimum and maximum arrangement presented may enable a situation in which the three types of Board Members have 5 members. In our view, there is still room to reduce the possible bias of the Institutional Sponsor, which has veto power.
9	Raul Brum Manzoni Junior	Advocacia Ambiental	Do you consider adequate the structure of the Board of Directors (number of chairs, appointment method and term)? Please provide specific perspectives and suggested adjustments	There must be a larger number of seats for civil society entities.
10	Fernando Couto	KAAETAMA	Do you consider adequate the structure of the Board of Directors (number of chairs, appointment method and term)? Please provide specific perspectives and suggested adjustments	Yes I agree, with the exception that land owners/carbon offsets should also be well represented
11	Luciane dos Santos	Pesquisadora	Do you consider adequate the structure of the Board of Directors (number of chairs, appointment method and term)? Please provide specific perspectives and suggested adjustments	I really liked the structure, or rather I liked the document as a whole. Very well produced, plotted and thought out. I recently approached the theme, and immersed myself to understand the general context. Everything you propose makes a lot of

				sense. I learned a lot from your material. One idea that may be relevant is to establish gender equality among board representatives, if it makes sense.
12	Mario R. A. Lewandowski	AGBI	Do you consider adequate the suggested archetypes for each group of the Brazilian VCM Council? Please provide specific perspectives and suggested adjustments	No. The third sector and non-class entities or associations of actors should be in the group funding sponsors and market participants, since they often play the role of market agents and not merely institutional.
13	Victor Ferraz	Aliança Brasil NBS	Do you consider adequate the suggested archetypes for each group of the Brazilian VCM Council? Please provide specific perspectives and suggested adjustments	We do not consider it to be totally adequate, as it seems to have a disproportionately larger representation of entities that work the theme in an abstract manner and not in a more practical and business-oriented manner. We also see little mention of government agencies or official bodies. We understand that the proposal is to cover the voluntary market, but if there is no interaction with the government, or to recognize its existence, the market will be very limited for international transactions, which values how carbon credits (even volunteers) are being considered within the "official system".
14	Raul Brum Manzoni Junior	Advocacia Ambiental	Do you consider adequate the suggested archetypes for each group of the Brazilian VCM Council? Please provide specific perspectives and suggested adjustments	Greater participation of financiers, as well as relevant tax incentives for them.
15	Daniela	Daniela Azevedo Sociedade Individual de Advocacia	Do you consider adequate the suggested archetypes for each group of the Brazilian VCM Council? Please provide specific perspectives and suggested adjustments	No, I disagree with the inclusion of 2 International Integrity Institutions in the Board groups. I believe they could prioritize national institutions.
16	Luciane dos Santos	Pesquisadora	Do you consider adequate the suggested archetypes for each group of the Brazilian VCM Council? Please provide specific perspectives and suggested adjustments	It seems appropriate to me. Does it make sense to include the term "civil society"? A suggestion for reflection, about the term adopted as "Sponsors".
17	Atta Oraee	Atkins	Which institutions would you suggest to be the Institutional Sponsor of the BR VCM Council to provide the necessary credibility and independence? Please, provide institution name and contact, if possible	VCMi, ICVCM, etc.
18	Mario R. A. Lewandowski	AGBI	Which institutions would you suggest to be the Institutional Sponsor of the BR VCM Council to provide the necessary credibility and independence? Please, provide institution name and contact, if possible	CVM, ANBIMA, ABVCAP, CBEDS, CNI, ICMBio, EMBRAPA, BACEN, IBAMA
19	Victor Ferraz	Aliança Brasil NBS	Which institutions would you suggest to be the Institutional Sponsor of the BR VCM Council to provide the necessary credibility and independence? Please, provide institution name and contact, if possible	CIFOR, Earth Innovation Institute, Gold Standard, ICROA, IETA, IPAM, Trovers, Ecosystem Marketplace, Climate Observatory, FGVces, Verra.
20	Raul Brum Manzoni Junior	Advocacia Ambiental	Which institutions would you suggest to be the Institutional Sponsor of the BR VCM Council to provide the necessary credibility and independence? Please, provide institution name and contact, if possible	Oversight of entities with international accreditation.
21	Fernando Couto	KAAETAMA	Which institutions would you suggest to be the Institutional Sponsor of the BR VCM Council to provide the necessary credibility and independence? Please, provide institution name and contact, if possible	I think that rating agencies that have been present in the market, such as BeZero, for example, could be invited
22	Luciane dos Santos	Pesquisadora	Which institutions would you suggest to be the Institutional Sponsor of the BR VCM Council to provide the necessary credibility and independence? Please, provide institution name and contact, if possible	Natura has a number of actions related to the sustainable production chain, especially for its Ekos product line. They are actions of Corporate Socioenvironmental Responsibility and ESG, above all, with an activity in the Amazon biome, but not limited to it. It collects several awards that it corroborates with the above statement, is company B certified with good reputation within and outside Brazil. A company that is very active in mitigating climate change, with a significant presence at the COP. It seems to me to be a name with representation, credibility, respect, among other adjectives. It seems important to me that Natura be an

				articulating link between the different sectors, namely: private enterprise, NGO, government, universities, associations, cooperatives, landowners, among others, that can strengthen the image and brand of the initiative.
23	Bruna Mascotte	Catavento Consultoria	Do you have any other comments to the Brazilian VCM Council?	It is important that the focus of the initiative and the Board always be on Brazil's integration with global best practices, and not on conducting Brazilian initiatives separate from international standards. The intention to take Brazilian demands and specificities is very welcome, adapting global standards to the local scenario. But we should be careful not to form an initiative separate from global best practices.
24	Victor Ferraz	Aliança Brasil NBS	Do you have any other comments to the Brazilian VCM Council?	<p>As for the Brazilian VCM Board, there is an important concern regarding independence, mitigation of conflicts of interest and aggregation of deep expert knowledge. However, the theme of the environment and carbon markets has different points of view of whether it can work or how it should work, and is quite politicized and ideological, besides a relatively short period of operation, where few players have extensive and relevant experience in the theme.</p> <p>In the composition presented, we understood that in order to address the independence and mitigation of conflicts of interest as mentioned above, a configuration was presented with a relevant presence of the Academy and NGOs. Nevertheless, it is important to note that even so and even if they do not have a direct interest in the market, some of these organizations have their own agendas to conduct, as they may also be part of the voluntary market with their own carbon projects.</p> <p>Thus, there is a sensitive point in the organization of this board, which on the one hand is important to be independent, including from private economic interests, and have legitimacy for the representation of various players, but at the same time one can create a very political body that is not very pragmatic and that loses sight of the elements necessary for a market to function. We also reinforced the need for government participation, even if it is a purely voluntary market.</p> <p>Another relevant point is that the 12-month implementation roadmap is perhaps a bit optimistic given the degree of complexity of the proposed activity, as these are many references to be consulted, among standards, regulations, etc. In another note, we also consider it important to foresee guiding publications such as market best practice guides for stakeholders.</p>
25	Raul Brum Manzoni Junior	Advocacia Ambiental	Do you have any other comments to the Brazilian VCM Council?	Greater government incentive, so that public and state development banks fund a large part of the projects, such as the importance of promoting, publicizing, clarifying to citizens and companies in general that do not participate in any project, about the need to invest in sustainability, receiving relevant tax benefits as a counterpart.
26	Luciane dos Santos	Pesquisadora	Do you have any other comments to the Brazilian VCM Council?	<p>Does Brazil have a bill to regulate the carbon credit market, when this market is regulated, will the board continue to operate only in the voluntary market?</p> <p>What is the way to be part of the initiative (partnerships with other organizations, companies, universities, NGOs, confederations interested in contributing to the initiative proposal)? How can they apply or get closer to the initiative?</p>

27	Victor Ferraz	Aliança Brasil NBS	Do you believe that the BR Voluntary Project Repository is a useful tool for the market? - Partially (please comment) - Text	It is of great importance that there be a mechanism for the voluntary carbon market (MVC) that helps to face Brazilian land and legal challenges and facilitates access and identification of the degree of quality and integrity of Brazilian carbon credits. The repository proposes to act in this context, which is one of the greatest obstacles to growth and economies of scale for MVC in Brazil. In this way, we recognize the tool's usefulness to the market. In the process of developing a carbon project, we conducted an initial due diligence that is composed of the analysis of 34 documents and then a more detailed analysis requires 49 documents from the proponent(s) of a project. This assessment allows a detailed understanding of the integrity issues involving a project, as well as mapping its associated risks. However, only this documental stage may not be completely conclusive, given the complexity of the Brazilian reality, especially the Amazon. For this reason, field analyzes are carried out in search of irregularities or points of attention that must be treated for the project to develop with maximum integrity. These numbers and analysis processes show the degree of difficulty we face in trying to ensure the development of healthy carbon projects. And it is also for this reason that we recognize the enormous need for creating mechanisms and ways of dealing with this question of quality and integrity in a clearer and more efficient manner, which translate the quality of the projects to investors who do not have mastery of the Brazilian reality. Finally, the repository's proposal is extremely valid, but, as it is constituted, it will not be able to meet the objective being proposed, since it is not sufficient to guarantee the integrity of a carbon project.
28	Victor Ferraz	Aliança Brasil NBS	Would you use the the BR Voluntary Project Repository? - Partially (please comment) - Text	The use of the repository depends on market adherence to it. In addition, in the way in which it is structured, use would depend on an improvement in the assessment of step 1, since the internal due diligence of project developers is more careful than that proposed by the repository.
29	Victor Ferraz	Aliança Brasil NBS	Do you believe that the proposed information categories to be included in the repository cover all the information needed? (please, refer to page 46 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) 1. BR-Specific Information - No (please comment) - Text	The proposed database regarding land ownership and socio-environmental issues is not sufficient to ensure the integrity (and quality) of a carbon project.
30	Fernando Couto	KAETAMA	Do you believe that the proposed information categories to be included in the repository cover all the information needed? (please, refer to page 46 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) Other (Please, specify)	I believe that due to the constant controversy surrounding the carbon credit generation methodology, that the Brazilian Initiative listen to those that have consolidated over time and that have been positively positioned in the face of criticism, such as the VERRA, CCB and Gold Standard
31	Victor Ferraz	Aliança Brasil NBS	What is missing and what is in excess regarding critical information for each category? 1. BR-Specific Information - Some information is missing/in excess (Please, specify) - Text	A more detailed document analysis is missing and it is interesting to consider the possibility of an on-site evaluation if the platform's objective really is to guarantee the high integrity of the projects registered in the platform.
32	Mariana Gracioso Barbosa	re.green	What is missing and what is in excess regarding critical information for each category?	Include mapping of Conservation Units (Federal and State) and rural settlements. The term tribe is no longer used. Include negative legal certificates and no slave labor. Register of consultation with communities (interested parties), if applicable. It is not clear what the pricing index means. Whether

			1. BR-Specific Information - Some information is missing/in excess (Please, specify) - Text	the term refers to how the price is calculated or the price itself.
33	Fernando Couto	KAAETAMA	What is missing and what is in excess regarding critical information for each category? 3. Additional Information - Some information is missing/in excess (Please, specify) - Text	I think ranking/ranking companies could be attracted to the initiative
34	Fernando Couto	KAAETAMA	Do you believe that the proposed governance structure provides the necessary integrity to the Voluntary National Project Repository? (please, refer to page 50 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) - Partially (please comment) - Text	If land owners do not have the proper presence and weight, the initiative may fail. I explain, if only companies/stakeholders fill the market, the economic incentive may not come as expected. Savings are the result of the incentives, if the owners do not feel compensated, new projects may be rare, as the extraction of wood for sustained handling or even of farming can be more compensating. Our task is to protect these owners and provide fair incentives.
35	Victor Ferraz	Aliança Brasil NBS	If you are willing to pay to use this mechanism, which of the following do you think that should be the payment/funding method? - Pay-per-use (Please comment) - Text	We find it interesting to offer payment per use and per subscription to meet ongoing and timely demands.
36	Raul Brum Manzoni Junior	Advocacia Ambiental	If you are willing to pay to use this mechanism, which of the following do you think that should be the payment/funding method? - Pay-per-use (Please comment) - Text	When necessary.
37	Fernando Couto	KAAETAMA	If you are willing to pay to use this mechanism, which of the following do you think that should be the payment/funding method? - Subscription (Please comment) - Text	I think that participating in an initiative that fosters the creation of new carbon credit projects deserves our support, in any way.
38	Mariana Gracioso Barbosa	re.green	If you are willing to pay to use this mechanism, which of the following do you think that should be the payment/funding method? - Subscription (Please comment) - Text	Subscription or monthly fees. It is not clear what the difference is.
39	Victor Ferraz	Aliança Brasil NBS	Do you believe that the Reference Dataset is a useful tool for the market? - Partially (Please comment) - Text	The data set proposed really has the most valid and consolidated. The product may be useful, but it is difficult to see how it would be marketed and in fact it would generate some resources in itself. In addition, it is important to make it clear that this data is not always the best resource to be applied to all projects. There are scientific studies, research, data in loco, among other data sources that may be much more adequate and representative of the reality of a project. Limiting the development of a project to this data set may end up compromising the use of other data that is even better for a project.
40	Mariana Gracioso Barbosa	re.green	Do you believe that the Reference Dataset is a useful tool for the market? - Partially (Please comment) - Text	There is a fear that the reference dataset to establish a standardized baseline and additionality may impact project-specific characteristics. As an example, the MapBiomas base considers a lower resolution, which sometimes generates a classification of land use that is incompatible with the real estate situation.
41	Diogo Aparecido Lopes Silva	UFSCar	Would you use the Reference Dataset? - Partially (Please Comment) - Text	Yes, but I believe it still needs adaptation
42	Victor Ferraz	Aliança Brasil NBS	Would you use the Reference Dataset? - Partially (Please Comment) - Text	Some developers could use the tool, and others would not, as they already use up-to-date and official data. Some developers are also looking for primary and local data, which provides the best possible information about the reality of the project areas. In addition, some projects may require additional data for specific analyzes, such as blue carbon.
43	Mariana Gracioso Barbosa	re.green	Would you use the Reference Dataset? - Partially (Please Comment) - Text	Yes, depending on governance and selected data.

44	Diogo Aparecido Lopes Silva	UFSCar	Do you believe that the proposed information categories to be included in the Reference Dataset cover all the information needed? (please, refer to page 58 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) 1. Land images - No (please comment) - Text	In the case of Brazil, there is still a lack of more regional images for the location where the product/project for analysis is geographically located, so that we can better understand the context
45	Victor Ferraz	Aliança Brasil NBS	Do you believe that the proposed information categories to be included in the Reference Dataset cover all the information needed? (please, refer to page 58 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) 1. Land images - No (please comment) - Text	The proposed data is indeed widely accepted and well used, which is totally coherent to be on this list. But there are other sensors and sources of official information at the state level that can (and should) be considered.
46	Raul Brum Manzoni Junior	Advocacia Ambiental	Do you believe that the proposed information categories to be included in the Reference Dataset cover all the information needed? (please, refer to page 58 of the public consultation material, available at https://www.brvc.org/en/consulta-publica)1. Land images - No (please comment) - Text	Centralization in a single federal government agency only.
47	Victor Ferraz	Aliança Brasil NBS	Do you believe that the proposed information categories to be included in the Reference Dataset cover all the information needed? (please, refer to page 58 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) 2. Natural Resources - No (please comment) - Text	On natural resources, the proposed data is coherent. However, there are studies carried out by public entities (Embrapa, universities and research centers) that can provide other useful information for a project.
48	Victor Ferraz	Aliança Brasil NBS	Do you believe that the proposed information categories to be included in the Reference Dataset cover all the information needed? (please, refer to page 58 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) 3. Deforestation - No (please comment) - Text	Besides the data provided, the use of satellite imagery and radar are very useful tools for evaluating historical deforestation in a region.
49	Victor Ferraz	Aliança Brasil NBS	Do you believe that the proposed information categories to be included in the Reference Dataset cover all the information needed? (please, refer to page 58 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) 4. Area classification - No (please comment) - Text	Lack of clarity, and few data groups were presented.
50	Camila Dias de Sá	Inspere (Inspere Agro Global)	Do you believe that the proposed information categories to be included in the Reference Dataset cover all the information needed? (please, refer to page 58 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) 4. Area classification - No (please comment) - Text	For the classification of the area, it is important to define commodity consumption centers, shipping routes and ports used. A possible source for these last two information is ESALQ-LOG
51	Diogo Aparecido Lopes Silva	UFSCar	Do you believe that the proposed information categories to be included in the Reference Dataset cover all the information needed? (please, refer to page 58 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) 5. Capture and store metrics - No (please comment) - Text	Some forms of capture are still incipient or lack more consolidated scientific data
52	Victor Ferraz	Aliança Brasil NBS	Do you believe that the proposed information categories to be included in the Reference Dataset cover all the information needed? (please, refer to page 58 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) 5. Capture and store metrics - No (please comment) - Text	The 4th Communication is a valid product that should be considered. However, it is not related to carbon sequestration (capture rate) by biome, just to inventory. It is important to note that this item can only use secondary information at the beginning of the project, over its lifetime it is necessary to carry out measurements (inventories) on site to quantify the carbon stock. Finally, the methodologies encourage the use of the most local

				data possible, and the 4th Communication provides more general information.
53	Alexandre Jabra	TRW	Do you believe that the proposed information categories to be included in the Reference Dataset cover all the information needed? (please, refer to page 58 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) 6. Other (Please, specify)	Agrotools
54	Victor Ferraz	Aliança Brasil NBS	Do you believe that the proposed information categories to be included in the Reference Dataset cover all the information needed? (please, refer to page 58 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) 6. Other (Please, specify)	It is important to point out that each baseline methodology, even if using the same data set, has different patterns. The proposal to create a model (p. 59) is not a simple proposal. Each methodology that will be employed in each project must be considered in order to have a baseline. And this does not go against the integrity of a project, but getting a single baseline is a challenging and, at the moment, unrealistic task.
55	Raul Brum Manzoni Junior	Advocacia Ambiental	Do you believe that the proposed information categories to be included in the Reference Dataset cover all the information needed? (please, refer to page 58 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) 6. Other (Please, specify)	No need.
56	Luciane risc	sssss	Do you believe that the proposed information categories to be included in the Reference Dataset cover all the information needed? (please, refer to page 58 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) 6. Other (Please, specify)	forests
57	Mariana Gracioso Barbosa	re.green	Do you believe that the proposed information categories to be included in the Reference Dataset cover all the information needed? (please, refer to page 58 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) 6. Other (Please, specify)	Economic use rates of the soil (heads of cattle per hectare, for example) can help demonstrate additionality and leakage.
58	Diogo Aparecido Lopes Silva	UFSCar	What is missing and what is in excess regarding critical information for each category? 1. Land images - Some information is missing/in excess (Please, specify) - Text	Regionalization for Brazil
59	Victor Ferraz	Aliança Brasil NBS	What is missing and what is in excess regarding critical information for each category? 1. Land images - Some information is missing/in excess (Please, specify) - Text	Include images from the CBERS, since the panchromatic band has 2 m resolution.
60	Victor Ferraz	Aliança Brasil NBS	2. Natural Resources - Some information is missing/in excess (Please, specify) - Text	Include two more data types: i) soils, to identify wet and flooded areas, for agricultural zoning, or for SOC estimates; and ii) slope of the land, for the interpretation of agricultural aptitude and for eligibility criteria.
61	Victor Ferraz	Aliança Brasil NBS	3. Deforestation - Some information is missing/in excess (Please, specify) - Text	Including MapBiomass, is important for defining conversion/deforestation drivers and for designing trajectories for rates in specific baselines, according to the project scenario.
62	Victor Ferraz	Aliança Brasil NBS	4. Area classification - Some information is missing/in excess (Please, specify) - Text	Include waterways and railways.
63	Camila Dias de Sá	Insper (Insper Agro Global)	4. Area classification - Some information is missing/in excess (Please, specify) - Text	additional relevant information to consider: Agricultural and climate zoning. This information in eventual future ALM projects, or even in ARR projects, may be indicative of the risk associated with the carbon remaining in the soil.
64	Diogo Aparecido Lopes Silva	UFSCar	5. Capture and storage - Some information is missing/in excess (Please, specify) - Text	Still very recent data for some technologies (lack of more scientific evidence of its effectiveness)
65	Victor Ferraz	Aliança Brasil NBS	5. Capture and storage - Some information is missing/in excess (Please, specify) - Text	Seek more consistent data on capture and include carbon stock maps in soils.

66	Diogo Aparecido Lopes Silva	UFSCar	Do these information categories provide enough details to develop and ensure optimized certification/verification process integrity? - Partially (Please comment) - Text	Partial, due to above.
67	Camila Dias de Sá	Inspere (Inspere Agro Global)	Do these information categories provide enough details to develop and ensure optimized certification/verification process integrity? - Partially (Please comment) - Text	HSC as a data source can only be considered a secure source after it has been validated by the competent state agency. It is not uncommon for HSCs to overlap with other land-ownership categories such as conservation units, indigenous land, non-destined land, etc. Also include data from PRAs (Environmental Regularization Programs)
68	Victor Ferraz	Aliança Brasil NBS	Do these information categories provide enough details to develop and ensure optimized certification/verification process integrity? - No (Please comment) - Text	No, because using the best data is a first step, but even with this data it is possible to calculate inflated baselines and generate projects without integrity. A health assessment goes beyond the dataset used. Some specific issues may require additional data for proper development.
69	Mariana Gracioso Barbosa	re.green	Do these information categories provide enough details to develop and ensure optimized certification/verification process integrity? - No (Please comment) - Text	No. We see more as a tool that can or cannot be used by developers, as integrity is a result of the specificity of each project.
70	Diogo Aparecido Lopes Silva	UFSCar	If you are willing to pay to use this mechanism, which of the following do you think that should be the payment/funding method? - Pay-per-use (Please comment) - Text	I think this mechanism is fairer.
71	Victor Ferraz	Aliança Brasil NBS	If you are willing to pay to use this mechanism, which of the following do you think that should be the payment/funding method? - Not willing to pay (Please comment) - Text	It would make no sense for developers, who already have access and ongoing use to this data, as well as labor capable of generating a baseline, to have to pay for this product. It would also depend on the values of each option.
72	Atta Oraee	Atkins	Aside from project finance, which other financial solutions could help scale the voluntary carbon market?	Scaling up private capital into the VCM
73	Mario R. A. Lewandowski	AGBI	Aside from project finance, which other financial solutions could help scale the voluntary carbon market?	Securitization based on carbon credits (and I don't know how much money flows)
74	Mariana Gracioso Barbosa	re.green	Aside from project finance, which other financial solutions could help scale the voluntary carbon market?	Blended finance, carbon-backed securities funds, receivables anticipation (CRA).
75	Mario R. A. Lewandowski	AGBI	Do you have any additional comments or suggestions regarding the scaling of financing for carbon credits projects?	The more a future carbon market is fostered and the risk of origination is diluted, the more secure the market and consequently the more investment.
76	Luciane risc	sssss	Rank the main carbon credit characteristics according to the order of importance when choosing a credit to purchase (from most to less important). Feel free to add other aspects that have not been contemplated - Other - Text	PSA
77	Mario R. A. Lewandowski	AGBI	Distribute 10 points between the proposed reference contracts, assigning more points to the contracts you believe should be prioritized. (please, refer to page 87 of the public consultation material, available at https://www.brvc.org/en/consulta-publica) Feel free to add other potential contracts that have not been contemplated. You can assign zero points to the products you believe should not be created. If you believe no new products should be created, assign all 10 points to the "None" category - Other - Text	AFOLU package (including agriculture)
78	Mario R. A. Lewandowski	AGBI	Do you have any additional comments or suggestions regarding reference contracts for the voluntary carbon market?	Future AFOLU contracts that include the recovery of degraded areas for agriculture and forest.

79	Victor Ferraz	Aliança Brasil NBS	<p>Are there any adaptations that should be done to the shortlisted methodologies in Brazil? (please, refer to page 100 of the public consultation material, available at https://www.brvcn.org/en/consulta-publica)</p> <p>1. VM0007 - Yes (please comment) - Text</p>	<p>For planned deforestation, it is necessary to conduct a careful analysis of the documents required for this. Some members of the Alliance believe that the request or license to deforest (ASV) should be disregarded, since the vast majority of the owners who deforest their property (even if the deforestation is within the limits of the law) does not ask for ASV. However, other members say that it is necessary to prove the intention of deforestation in some way, such as the ASV. We recommend that this methodology be analyzed with care for the Brazilian case, since APD projects have been drawn up outside the localities of the tangible universe. In addition, some important aspects need to be considered, such as: legal threat (legal permitting, agricultural aptitude), Intention to deforest (government approval or request for approval, forestry exploration plan or history of planned deforestation), rate of deforestation (exploration plan or area proxy), likelihood of deforestation, among others. The assessment of carbon stocks in the baseline: Literature data or official documents should be accepted to determine carbon stocks, when available and specific to a given region. The costs of forestry inventory are quite high, which makes it impossible for smaller properties to participate in projects.</p>
80	Victor Ferraz	Aliança Brasil NBS	5. VM0003 - Yes (please comment) - Text	<p>Consider the possibility of counting the carbon emitted from the soil when an area larger than 10% of the total area is disturbed during preparation. Currently it is an eligibility criterion that at most 10% of the area is disturbed during planting.</p>
81	Victor Ferraz	Aliança Brasil NBS	9. ACM0002 - Yes (please comment) - Text	<p>Definition and acceptance of the "Quantification Approach 2: Measure and re-measure". The high complexity associated with the SOC accumulation models and the difficulty in adapting existing models are a huge obstacle in the area of generating ALM credits in Brazil.</p>
82	Victor Ferraz	Aliança Brasil NBS	10. AMS-I.E. - Yes (please comment) - Text	<p>Elaboration of standardized baselines, or something similar, to facilitate the demonstration of the local scenario. Thus, both the additionality and baseline benefit, bringing more confidence to the project developed with this methodology.</p>
83	Victor Ferraz	Aliança Brasil NBS	11. ACM0001 - Yes (please comment) - Text	<p>Elaboration of standardized baselines, or something similar, to facilitate the demonstration of the local scenario. Thus, both the additionality and baseline benefit, bringing more confidence to the project developed with this methodology.</p>
84	Victor Ferraz	Aliança Brasil NBS	12. AMS-III.D. - Yes (please comment) - Text	<p>Elaboration of standardized baselines, or something similar, to facilitate the demonstration of the local scenario. Thus, both the additionality and baseline benefit, bringing more confidence to the project developed with this methodology.</p>
85	Victor Ferraz	Aliança Brasil NBS	Additionally, are there any specific methodologies that should be created/proposed?	<p>At the Brazilian level, we have other more specific Biomes, such as the Pantanal, the Atlantic Rain Forest and the Cerrado, in which methodologies dedicated to them would fit.</p>
86	Mariana Gracioso Barbosa	re.green	Additionally, are there any specific methodologies that should be created/proposed?	<p>"Adaptation of VM 0012 methodology for tropical forests, with the objective of characterizing the eligibility of areas with initial forest formations that suffer from constant degradation processes and therefore do not evolve to forests in advanced stages of regeneration. "</p>
87	Mario R. A. Lewandowski	AGBI	Regarding ALM methodology VM0042, what are the specific adaptations that can be made to unlock high-integrity carbon credits from agriculture in Brazil?	<p>Constant review and updating, according to new findings and research at Embrapa.</p>
88	Victor Ferraz	Aliança Brasil NBS	Regarding ALM methodology VM0042, what are the specific adaptations that can be made to unlock high-integrity carbon credits from agriculture in Brazil?	<p>Family farming credits should be considered within the methodology, and not just focus on the big Agro ones. Family farming is important in the world to ensure the fight against hunger, one of the UN's</p>

				Sustainable Development Goals, as well as its practices must be valued and protected in the face of the great challenge of being the country that feeds the world. The methodology, processes and costs need to be feasible for this form of agricultural production.
89	Mariana Gracioso Barbosa	re.green	Regarding ALM methodology VM0042, what are the specific adaptations that can be made to unlock high-integrity carbon credits from agriculture in Brazil?	Carbon measurement metrics in soil could be used for AFOLU projects.
90	Diogo Aparecido Lopes Silva	UFSCar	What are other levers that can support the creation of carbon credits from ALM in Brazil?	Incentive to use the concept of biomass cascading
91	Victor Ferraz	Aliança Brasil NBS	What are other levers that can support the creation of carbon credits from ALM in Brazil?	It should be considered within the methodology to unlock credits from family agriculture, since it is this that has already demonstrated sustainable soil handling and land use, which, many of them, have been taken up in large agricultural production, precisely in the quest for resuming productivity and holding back the costs that are moving fast.
92	Mariana Gracioso Barbosa	re.green	What are other levers that can support the creation of carbon credits from ALM in Brazil?	Reduce leakage percentage and facilitate obtaining certificates such as CCB or other specific ones.
93	Camila Dias de Sá	Inspere (Inspere Agro Global)	What are other levers that can support the creation of carbon credits from ALM in Brazil?	Although direct planting (PD), crop rotation and coverage crops are already widely used, especially PD, the joint use of these three interventions is not as common, so this combination alone has the potential for additionality.
94	Mario R. A. Lewandowski	AGBI	Is there any other mechanism that you judge as essential/crucial for the development of the Voluntary Carbon Market in Brazil that was not included in this survey? Please comment below.	Mechanisms to disclose voluntary standards in Brazil. Creation of a database of risk information associated with the integrity of each methodology for calculating the probability of success of projects.
95	Victor Ferraz	Aliança Brasil NBS	Is there any other mechanism that you judge as essential/crucial for the development of the Voluntary Carbon Market in Brazil that was not included in this survey? Please comment below.	Achieve tokenization and technology to ensure the integrity of the carbon market and foster its great growth, but with quality control.
96	Fernando Couto	KAAETAMA	Is there any other mechanism that you judge as essential/crucial for the development of the Voluntary Carbon Market in Brazil that was not included in this survey? Please comment below.	Accreditation of certified credits, as in ICROA
97	Mario R. A. Lewandowski	AGBI	Do you have any other comments about the initiative?	Different methodologies and carbon bonds should be discussed in light of mechanisms to measure the integrity risks of different methodologies, so that a consolidated risk of a credit portfolio can be calculated.
98	Victor Ferraz	Aliança Brasil NBS	Do you have any other comments about the initiative?	We need to make room in Brazil for certifying agents besides Verra, such as the Biocarbon Registry and Cercarbon, already recognized in the international market, with high quality, adapted to the reality in Latin America. From a technical point of view, they are all very similar, and there are also no major variations in negotiated prices. Brazil, with large size and potential, should diversify players so as not to have technical bottlenecks, and not be hostage to just one player at a certain point in the market ecosystem. We consider that working with the entry of these new certifiers, ensuring the integrity of the carbon market, is more valid than spending energy creating new methodologies. It is also extremely important to recognize the need for more Brazilian auditors trained in the Verra methodologies and other certifiers that enter, only in this way will we release the demand for the coming years. It is fundamental to stimulate Brazilian VVBs and to train foreign ones so that they know the specificities of Brazil. Bringing this knowledge closer to recent graduates or graduates of forest engineers and related areas in Universities can be a way. The inclusion of "traditional" methodologies could be better prepared. The suggestion is to include sectors, not methodologies. For example:-

				for renewable energy generation, we included the ACM0002 (large scale) methodology, but we did not include the small scale methodology (AMS-I.D.), and suggest it be included. - the methodology AMS-III.D (methane recovery) was included, but another very similar methodology was not included, such as AMS-III.AO.- no Gold Standard methodology included. This program has both cookie methodologies (similar to AMS-I.E, which was included) and waste methodologies (similar to AMS-III.D, which was included).
99	Fernando Couto	KAAETAMA	Do you have any other comments about the initiative?	I believe that no government, no matter how good will it has, even if it has a consistent and favorable legislative framework, can stand alone in destroying our biomes. I believe that only the engagement of the Private Initiative coupled with government efforts can invert the incentive to deforestation and foster the protection of the forest and its biodiversity, and really promote preservation, conservation and reforestation. Finally and more importantly, on private land there live millions of Brazilians, riverside dwellers and backlands, without any or almost assistance from the State to provide them with health, education and socio-economic development. Without these attributes, no inactive will be worthwhile. To close, there is a whole judicial question, protection on the State's land and the indigenous population that I did not see mentioned in the initiative, perhaps because of my fault or because it would escape the current scope. Good luck and have it with us.
100	Camila Dias de Sá	Inspere (Inspere Agro Global)	Do you have any other comments about the initiative?	I could not find where to comment on the question "How to ensure databases are frequently updated and accepted by all stakeholders involved in the project approval process? Here's my comment: Constant actions to engage with stakeholders, especially consider the figure of land owners who, for the most part, do not understand the functioning of the carbon market, and for this reason do not consider this need (an organized, credible and up-to-date database) as an industry agenda. Given the current influence of agribusiness in the definition of policies in Brazil, this awareness is very important.
101	Luciane dos Santos	Pesquisadora	Do you have any other comments about the initiative?	A final suggestion is to expand the invitation to participate in the public hearing, different players, namely: private enterprise, NGO, government, universities, among others. I want to congratulate you on the initiative and effort you have put into the voluntary carbon market in Brazil. I would like to receive information on the progress of the proposal and next steps. I am happy to collaborate and learn from you.