



**Comments received by Verra during the public comment period 10 September to 10 October 2024 of The Last Habitat REDD+ Project ID #3344**

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**Comment 1**

Date: 17 September 2024

Sent by:

Organization:

Country:

1. Project claims to be a "planned deforestation project" however all project activities described under 2.1.1 "Mitigation of deforestation risks" focus on stopping the unplanned threat of deforestation the PD outlines in "Continuation of the pre-project land use" of section 2.2.1. What is the primary activity to stop the "Planned Deforestation".
  2. Section 3.1.4 A identifies the project proponent Bosques Amazonicos as the agent of deforestation, however the mentioned company is formed for conservation stating the following about themselves "Our purpose is to protect and restore the value of the ecosystems of the Amazon to mitigate the effects of climate change; conserve the biodiversity of the Amazon; and contribute to the economic, social and environmental development of Peru."
  3. The land purchase contracts on page 89 of the PD that are being used to demonstrate legal permissibility to deforest are dated 1999 and 2009. What condition in 2020 is different than at the time of the signature that makes an immediate site-specific threat to deforestation. Since these parcels have been legally authorized for  $\geq 15$  years to be deforested and instead remains protected leads me to believe that there is not an immediate site-specific threat to planned deforestation for the project.
  4. Section 3.1.4 .B.4 "Intention to deforest" uses the document found in footnote 24, page 91 of the PDD titled "The Technical Economic Feasibility Study for Nuestro Señor Jesucristo and the Project Profile for Selva Maestra" as evidence of the intention to deforest, however the PD states these were drafted to enable the purchase of the properties, indicating they are  $\geq 12$  years old at the proposed start date. What has changed that will put these plans into action after 12 and 21 years respectively?
  5. While I do believe there is deforestation threat, I am not convinced that the threat is truly a planned threat and instead is an unplanned threat. I have concerns that the project is designed as a planned deforestation project due to the inherent higher crediting potential of planned deforestation scenarios compared to unplanned deforestation.
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## **Comment 2**

Date: 18 September 2024

Sent by:

Organization:

Country:

1. Communities and community groups are not defined as required by CCB.
2. Specific activities for community benefits are not identified.
3. The PD does not address if the participating communities have rights to perform certain activities in the project area (specifically customary rights).
4. It seems unlikely that these areas could actually be converted to another land use based on the historical land use patterns of the area. The PD does not contain sufficient information to allow a reader to understand how the Project has demonstrated that the Project Area can be converted.

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## **Comment 3**

Date: 18 September 2024

Sent by:

Organization:

Country:

There is insufficient information in the PD to determine whether or not the grievance process meets the requirements of the CCB Standard.

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