

Comments on FCCC/AWGLCA/2010/14/Chapter VI

Submitted by:

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The organizations listed above strongly support Option 2 in the LCA text dealing with REDD+. Much progress has been made on that text over the past year and we urge Parties to focus only on the items remaining in brackets in Option 2 during subsequent negotiations.

This document highlights changes to the bracketed sections of Option 2 in FCCC/AWGLCA/2010/14/Chapter VI that the organizations listed above support. Changes are marked in track changes and endnotes describe our rationale for those changes. We feel that these changes will result in a stronger REDD+ policy framework.

Policy approaches and positive incentives on issues relating to reducing emissions from deforestation and forest degradation in developing countries; and the role of conservation, sustainable management of forests and enhancement of forest carbon stocks in developing countries¹

The Conference of the Parties,

Recalling decisions 1/CP.13, 2/CP.13, x/CP.15² (AWG-LCA core) and ~~4x~~/CP.15 (SBSTA decision),

~~{Affirming that, with the provision of at least USD25-35 billion per year, all Parties should collectively aim at halting net emissions from forest cover loss in developing countries by 2030 and reducing emissions from gross deforestation and degradation in developing countries by at least 50% by 2020 compared to current levels. {for any quantitative goal to be inserted or moved elsewhere}}~~

1. Encourages all Parties to find effective ways to reduce the pressure on forests that results in greenhouse gas emissions,

~~1-2.~~ Affirms that the implementation of activities referred to in paragraph ~~43~~ below:

- (a) Contribute to the objective set out in Article 2 of the Convention;
- (b) ~~{Contribute to the commitments set out in Article 4, paragraph 3, of the Convention;}~~
- (c) Be country-driven and ~~{voluntary}~~ proposed voluntarily;

¹ Work undertaken by the Conference of the Parties on the text contained in annex I G to document FCCC/AWGLCA/2009/17.

² This reference was made in relation to the text contained in annex I C to document FCCC/AWGLCA/2009/17.

- (d) Be undertaken in accordance with national circumstances and capabilities of the country and respect sovereignty;
- (e) Be consistent with national sustainable development needs and goals;
- (f) Facilitate sustainable development, reduce poverty and respond to climate change in developing country Parties;
- (g) Promote broad country participation;
- (h) Be consistent with the adaptation needs of the country;
- (i) Be ~~integrated into nationally appropriate mitigation actions~~ developed within the context of the formulation of a low greenhouse gas emission strategy;ⁱⁱ
- (j) Be subject to ~~equitable, adequate, predictable and sustainable~~ⁱⁱⁱ financing and technology support, including support for capacity-building;
- (k) Be results-based;
- (l) Promote sustainable management of forests;

~~2.3.~~ *Further affirms* that when undertaking activities referred to in paragraph ~~43~~ below, the following safeguards should be promoted and supported:

- (a) Actions complement or are consistent with the objectives of national forest programmes and relevant international conventions and agreements;
- (b) Transparent and effective national forest governance structures, taking into account national legislation and sovereignty;
- (c) Respect for the knowledge and rights of indigenous peoples and members of local communities, by taking into account relevant international obligations, national circumstances and laws, and noting that the General Assembly has adopted the United Nations Declaration on the Rights of Indigenous Peoples;
- (d) Full and effective participation of relevant stakeholders, including, in particular, indigenous peoples and local communities in actions referred to in paragraphs ~~43~~ and ~~65~~ below, taking into account the need for sustainable livelihoods of indigenous peoples and members of local communities;^{iv}
- (e) Actions that are consistent with the conservation of natural forests and biological diversity, ensuring that actions referred to in paragraph 3 below are not used for the conversion of natural forests, but are instead used to incentivize the protection and

conservation of natural forests and their ecosystem services, and to enhance other social and environmental benefits;³

(f) Actions to address the risks of reversals;

(g) Actions to reduce displacement of emissions;

~~3.4.~~ *Decides* that developing country Parties should contribute to mitigation actions in the forest sector by undertaking the following activities:

(a) Reducing emissions from deforestation;

(b) Reducing emissions from forest degradation;

(c) Conservation of forest carbon stocks;

(d) Sustainable management of forest;

(e) Enhancement of forest carbon stocks;

~~4.5.~~ *Requests* the Subsidiary Body for Scientific and Technological Advice to undertake, starting at its thirty-fourth session, a work programme to identify land use, land-use change and forestry activities in developing countries, in particular those that are linked to the drivers of deforestation and forest degradation, to identify the associated methodological issues to estimate emissions and removals resulting from these activities, and to assess their potential contribution to the mitigation of climate change and report on the findings to the Conference of the Parties at its 17th~~xx~~ session;^v

~~5.6.~~ *Also requests* that a developing country Party aiming to undertake activities referred to in paragraph ~~43~~ above, ~~{provided that support is made available,}~~ in accordance with national circumstances and respective capabilities, develop:

(a) A national strategy or action plan ~~{and, as if appropriate, a subnational strategy}~~, as part of the development of their low-carbon emission strategies and in accordance with decision x/CP.15⁴ (Mitigation);^{vi}

(b) ~~{A national forest reference emission level and/or forest reference level, or if appropriate, subnational forest reference emission level[s] and/or forest reference level[s]}~~ as an optional short-term interim measure and taking into account national circumstances, or over the long-term accounted under national accounting frameworks,^{vii} taking into

³ ~~[Taking into account the need for sustainable livelihoods of indigenous peoples and local communities and their interdependence on forests in most countries, reflected in the United Nations Declaration on the Rights of Indigenous Peoples and the International Mother Earth Day.]~~

⁴ ~~This reference was made in relation to the text contained in annex I A to document FCCC/AWGLCA/2009/17.~~

account decision ~~4~~/CP.15 (SBSTA decision) and any further elaboration of those provisions agreed by the Conference of the Parties;^{viii}}

(c) ~~{~~A robust and transparent national forest monitoring system for the monitoring and reporting of the activities referred to in paragraph ~~43~~ above~~}, including information on how~~and the safeguards referred to in paragraph ~~32~~ above ~~are implemented~~~~}~~,^{ix} with, as appropriate, subnational monitoring and reporting as an optional interim measure,⁵ in accordance with the provisions contained in decision ~~4~~/CP.15 (SBSTA decision) and any further elaboration of those provisions agreed by the Conference of the Parties;~~}~~

~~6-7.~~ *Further requests* the Subsidiary Body for Scientific and Technological Advice, ~~starting~~ at its ~~thirty-fourth~~~~{xx}~~ session, to develop modalities relating to paragraph ~~65~~ (b) and (c) above, for adoption by the Conference of the Parties at its ~~17th~~~~{xx}~~ session.^x

~~7-8.~~ *Requests* developing country Parties, when developing and implementing their national strategies or action plan, ~~{or interim subnational strategies}~~ to address, inter alia, drivers of deforestation and forest degradation, land tenure issues, forest governance issues, gender considerations and the safeguards identified in paragraph ~~32~~ above, ensuring the full and effective participation of relevant stakeholders, inter alia, indigenous peoples and local communities;

~~8-9.~~ *Decides* that the activities undertaken by Parties referred to in paragraph ~~43~~ above be implemented in phases, beginning with the development of national strategies or action plans, policies and measures and capacity-building, followed by the implementation of national policies and measures, and national strategies or action plans and, as appropriate, subnational strategies, that could involve further capacity building, technology development and transfer and results-based demonstration activities, and evolving into results-based actions ~~{that shall be fully measured, reported and verified}~~~~}~~;^{xi}

~~9-10.~~ *Recognizes* that the implementation of the activities referred to in paragraph ~~98~~ above, including the choice of a starting phase, depends on the specific national circumstances, capacities and capabilities of each developing country Party and the level of support received;

~~10-11.~~ *Requests* the Subsidiary Body for Scientific and Technological Advice, at its ~~thirty-fourth~~~~{xx}~~ session, to develop, as necessary, modalities for ~~{measuring, reporting and verifying}~~ anthropogenic forest-related emissions by sources and removals by sinks, forest carbon stocks, ~~forest carbon stocks~~ and forest area changes resulting from the implementation of activities referred to in paragraph ~~43~~ above~~}, and consistent with any guidance for measuring, reporting and verification of nationally appropriate mitigation actions by developing country Parties agreed by the Conference of the Parties}~~,^{xii} taking into account methodological guidance in

⁵ Including monitoring and reporting ~~on how~~ ~~of~~ emissions displacement ~~is addressed~~ ~~at the national level~~.

accordance with decision ~~4~~/CP.15 (SBSTA decision), for adoption by the Conference of the Parties at its ~~17~~th session;

~~11,12.~~ 12. ~~Requests~~ the Subsidiary Body for Scientific and Technological Advice to develop, at its ~~thirty-fourth~~ session, modalities for measuring, reporting and verifying the implementation of the safeguards referred to in paragraph 3 as well as measuring, reporting and verifying the support provided by developed country Parties to support the implementation of safeguards and actions referred to in paragraphs ~~32~~ and ~~43~~ above;^{xiii}

~~12. Requests that the promotion and implementation of all activities referred to in paragraphs 3, 5, 7 and 8 above, including consideration of the safeguards referred to in paragraph 2 above, and early action, be supported in accordance with [paragraph 1 (b) above and] relevant provisions agreed by the Conference of the Parties including:~~

~~13. (a) [Decision ~~x~~/CP.15⁶ (finance);]~~

~~14. (b) [Decision ~~x~~/CP.15⁷ (1 (b) (v)),] [for result-based actions a flexible combination of funds and market-based sources subject to modalities to be agreed by the Conference of the Parties at its ~~xx~~ session];~~

~~15. (c) [through existing bilateral and multilateral channels;]~~^{xiv}

13. Requests that the promotion and implementation of all activities referred to in paragraphs 3, 4, and 6 above, including early action, be supported in accordance with the preambular paragraph above (objective) and paragraph 2(b) and other relevant provisions agreed by the Conference of the Parties through the provision of adequate and sustainable funding that is new and additional to existing ODA targets;^{xv}

14. Also requests that the outcomes of results-based actions that are measured, reported, and verified as referred to in paragraph 9 above can be used to meet part of Parties' quantified emissions limitation and reduction commitments under the Convention, subject to rigorous rules around additionality, permanence, and leakage;^{xvi}

~~16,15.~~ 15. Requests Parties, [relevant international organizations, and stakeholders] to ensure coordination of the activities referred to in paragraph ~~132~~ above, including of the related support, particularly at the country level;

⁶This reference was made in relation to the text contained in annex I C to document FCCC/AWGLCA/2009/17.

⁷This reference was made in relation to the text contained in annex I I to document FCCC/AWGLCA/2009/17.

17-16. *Requests* the [Subsidiary Body for Scientific and Technological Advice] to develop modalities for the promotion and implementation of the development of national strategies or action plans, policies and measures and capacity-building, the implementation of national policies and measures, and national strategies or action plans and, as appropriate, subnational strategies, that could involve further capacity building, technology transfer and results-based demonstration activities, by its [xx] session, for adoption by the Conference of the Parties at its [xx] session.

ⁱ We support the inclusion of an ambitious global objective. The global objective provides guidance to all Parties about the level of action and support expected from the policy framework and establishes a benchmark for measuring progress. We feel that the objective we have included is ambitious, yet reachable. This goal should be quantitative, both in terms of emissions reductions to be achieved and financing committed. The most recent estimated costs of cutting deforestation in half range from \$12 to \$35 billion USD/year. Additionally, the determination of what constitutes “current levels” is a technical matter that should be referred to SBSTA for consideration.

ⁱⁱ We have removed reference to REDD+ being a NAMA due to the current lack of defined rules for NAMAs. REDD+ may eventually be included as a NAMA if appropriate. We believe that REDD+ will ultimately be more successful if it is integrated into a low carbon development strategy and encourage countries to develop such strategies and demonstrate good governance; however, we do not believe that the implementation of REDD+ should be postponed until after a country has developed such a plan. Therefore we have altered the existing language somewhat to reflect the need to move forward on both.

ⁱⁱⁱ We have removed the brackets because we feel that it is critical that developing country governments have confidence in the financial flows for REDD+. Implementing the necessary activities to achieve both national and global goals will require a great deal of political capital from leaders in developing countries; they will not get very far in their efforts without reliable financial commitments by developed countries that can make those goals achievable.

^{iv} We have deleted footnote 3 because we believe some of it to be redundant with other paragraphs. However, we have retained this phrase from the footnote because it accurately reflects the need for REDD+ to contribute to sustainable livelihoods for forest-dependent communities in order for it to be sustainable over the long-term.

^v We feel that there is no reason to delay this request to SBSTA and that SBSTA can immediately begin work on this issue in order to provide its report as soon as possible.

^{vi} We feel that sub-national strategies can play a valuable role in REDD+. Regardless of the level at which incentives are ultimately granted, sub-national strategies can help identify more localized drivers of deforestation and identify ways of involving more local stakeholders in the implementation of REDD+. Additionally, in many federal systems, sub-national governments have authority over their forests and therefore the involvement of sub-national actors in creating strategies for REDD+ is critical.

^{vii} We believe that a nested approach to REDD+ could be beneficial for distributing benefits directly to sub-national actors and for fostering private investment in REDD+, provided that the sub-national accounting is credibly tied up to the national accounting framework.

^{viii} We believe that a short-term interim period for sub-national accounting is beneficial. One option for subnational accounting under certain conditions is: (1) state/province-level crediting for 5 years for large emitters; and (2) project-level crediting for 8 years in small emitters, with the possibility of a 5 year extension under certain conditions for the least developed countries.

^{ix} The safeguards in paragraph 3 are critically important. Monitoring and reporting on how those safeguards are addressed in REDD+ programs is required in order to ensure the safeguards are implemented and will help ensure that countries are following through on their commitment to promote and support those safeguards. The REDD+ Social & Environmental Standards (www.climate-standards.org/REDD+/) provide a useful framework for monitoring and reporting social and environmental impacts of national or other government-led REDD+ programs.

^x We feel that there is no reason to delay this request to SBSTA and that SBSTA can immediately begin work on this issue in order to provide its report as soon as possible. Countries are already beginning to develop reference levels

and monitoring systems as part of their REDD+ readiness efforts, so clarity on the requirements would be helpful as soon as possible. The COP should conclude on these issues at its next session.

^{xi} Robust MRV systems for REDD+ are critical for guaranteeing the environmental integrity of the mechanism, particularly for a market-based approach.

^{xii} Given the current state of the negotiations on NAMAs, it remains unclear whether the MRV rules for NAMAs are appropriate for REDD+.

^{xiii} MRV of support will help ensure that developed countries are meeting their commitments to financing for REDD+. Additionally, MRV of support can help countries coordinate their investments for maximum return, avoid redundancies, and provide a platform for lesson-sharing.

^{xiv} We have re-written this paragraph – see new paragraphs 13 and 14.

^{xv} We believe that public funding commitments are necessary for getting REDD+ off the ground, and particularly for providing needed investment in readiness activities.

^{xvi} We believe that market finance for REDD+ is necessary for reaching the level of investment needed to truly address the problem. Market mechanisms for REDD+ must be designed to account for and address additionality, permanence and leakage, using incentives to reduce uncertainty when possible, and conservative estimates to address remaining uncertainty.