



1<sup>st</sup> April 2021

**Comments submitted by bp:**

**Consultation for version 2.0 of *The REDD+ Environmental Excellence Standard (TREES)* to The Secretariat of the Architecture for REDD+ Transactions (ART)**

- We support the principle of the inclusion of Indigenous Territories who can now be considered eligible as subnational accounting areas or as direct Participants in ART. The size/scale threshold seems appropriate given its consistency with the existing criteria for sub-national jurisdiction participation.
- We'd recommend more detail is given on how 'recognized indigenous territory' is defined. This approach will work in countries that have the right regulations and where the government has recognized and properly defined indigenous territory. Where this could become problematic is where those territories are not 'recognized' or disputed.
- We support the inclusion of a mechanism to credit high-forest-low-deforestation (HFLD). We consider it important that crediting for the HFLD is included, to incentivise the on-going protection of these areas.
- We are supportive of the addition of the **inclusion of removals** from the conversion of non-forest to forest as eligible for crediting.
  - o We question whether it is necessary to constrain this to only Participants that have successfully reduced emissions from deforestation and degradation. We recognise it is of the utmost importance to prevent perverse incentives of gaining crediting for removals as a result of deforestation/ degradation but other measures can be put in place to prevent this.
  - o We question the need for the sequential approach taken to the crediting of removals and would recommend that crediting of removals can occur in tandem with crediting of reducing emissions from deforestation and degradation. We find the current approach in version 2.0 disincentivises immediate/short-term restoration efforts. In addition, it could deter a holistic approach to sustainable management of landscapes, as often restoration and conservation of forests go hand in hand. We would like to see both have access to carbon crediting from the start. We reiterate the need to ensure strong environmental safeguards are upheld in relation to the type and location of restoration/removals activities.
- We encourage the ART Secretariat to continue to review methodological options for the inclusion of removals from 'forests remaining forests' in future iterations of the Standard.