

23 September 2019

ART Secretariat
REDD@Winrock.org

RE: TREES consultation

Dear representatives of the ART Secretariat:

We are a member based Californian nonprofit organization, focused exclusively on supporting and scaling the REDD+ mechanism. From the Amazon Basin, to the African Savannah, to the Heart of Borneo, our members' voluntary REDD+ projects are supporting and scaling the REDD+ mechanism to realize its full potential to empower people, preserve forests, protect wildlife, and reduce emissions. Our members represent corporate buyers, market participants, and leading REDD+ project developers from around the world. With both for profit, and nonprofit, project proponents.

We are grateful for the opportunity to participate in the consultation for the development of 'The REDD+ Environmental Excellency Standard'.

Our feedback and suggestions are as follows;

Reference/Crediting level parameters

We are concerned that the requirement to only use a 10 year historical average basis for the reference/crediting level will be counterproductive for countries facing rising emissions which are the countries that matter for REDD+. We propose you allow UN level flexibility in setting reference level, for example country specific circumstances required to defend a BAU model.

We also urge a speedy resolution for the missing HFLD adjusted baseline provisions. This will be essential not to discourage participation by relevant jurisdictions and countries. Please note we see little to no value in the interim tagging provisions.

We are concerned that the automatic reduction by 20% of the reference/crediting level is overtly punitive and restrictive. We believe this will deter both country use of the standard and the private sector investment the standard is trying to stimulate. We propose baselines be re-evaluated but should not be reduced based on the success of the program itself.

Nesting Provisions

It is not clear to us whether the open arrangement for nesting, relates only to benefit sharing, and not to nested performance. If the nested benefit sharing only allows performance measured at the jurisdictional level with the private sector able to be "allocated" performance, this may be an acceptable model for some bi-lateral/multi-lateral pay for performance, and, compliance market performance, but will be unattractive for private sector investors as the risk of investment being nullified by poor overall performance is not acceptable.

We'd like to highlight the positive example in Colombia where nested performance recognizes the right of projects to **all** of their performance, with a structure that some performance contributes to

national performance and a remainder being available for voluntary market or domestic compliance market performance.

National level accounting areas by 2025

We are concerned that the application of the standard for use at the sub-national level, only until 2025, is not practical in terms of how far national REDD+ frameworks will be advanced by 2025. This again we believe will deter both country use of the standard and the private sector investment the standard is trying to stimulate. We would propose that the transition period is set for 2030.

Thank you very much for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "M Radomir". The signature is written in a cursive, slightly stylized font.

Michael Radomir,
Executive Director, Code REDD