Response of FAO to the Public Consultation on the REDD+ ENVIRONMENTAL EXCELLENCY STANDARD (TREES) and the Architecture for REDD+ Transactions (ART) Program

FAO welcomes the opportunity to provide the following comments to the ART/TREES.

General comments

1. Financing was one of the most sensitive issues during the REDD+ negotiations, with some countries reluctant to accept additional requirements unless clear and sufficient financing commitments were made. In this regard, FAO sees new financing opportunities for REDD+ actions as a positive development.
2. FAO suggests that ART should be designed to support scaled up implementation of the UNFCCC COP decisions including the Paris Agreement, Warsaw Framework, Cancun Safeguards and the Green Climate Fund's support for REDD+. The latter has established additional criteria to the UNFCCC Technical Assessment and Analysis process (MRV Process).
3. The multilateral process, like the UNFCCC, or other initiatives with long and transparent governance processes have enabled countries to engage and reach agreement. It would be important to understand how ART/TREES would relate to these other processes and how it will draw from the lessons learned in its own governance structures. Overall, the description of the governance of the standard should provide more details on its procedures
4. Overall, we find that additional documentation is needed in order to fully understand the implications of the TREES standard. We would welcome the opportunity to further comment once the full documentation is available (there is reference to templates and guidance documents).
5. To enhance transparency, further information on the intended buyers and the monitoring of the potential use of the credits may be useful.
6. As the number of REDD+ finance initiatives (multilateral or bilateral) multiply, new initiatives run the risk of further complicating the landscape of requirements and may result in additional confusion. To that effect, we believe that it would be useful for the ART/TREES initiative to facilitate understanding of how the initiative and TREES requirements relate to existing processes by providing a simple mapping table of key differences and adding a section on compatibility with UNFCCC requirements, for example:

Ex: 2.4	UNFCCC	GCF	ART/TREES
Requirement 1		CN RBPs	Trees Concept
Requirement 2		FP RBPs	TREES Registration Document
Requirement 3	Technical Annex		TREES Monitoring Report
Etc...			

This would help countries assess how the initiative allows them to meet their objectives, and how they may incorporate some of the additional requirements in their reporting to the UNFCCC.

7. The above comment also applies to the relationship of the TREES standard with other standards that provide for jurisdictional REDD+ results to be accounted for.
8. In order for countries/jurisdictions to better understand ART and TREES, it would be useful to provide more information on the rationale for some of the criteria used (e.g. size of jurisdictions, temporal periods, uncertainty thresholds, etc.).

Specific comments

Ch.	Page	Original text	Suggested Change/Question/Comment
2.1	13	An applicant shall be a national government entity in accordance with the requirements set forth in Section 3 and will hereafter be referred to as a TREES Participant.	Suggested change: Applicants could be either national or subnational government, or entities that have received approval of national government. Consistency with the submissions made to the UNFCCC is recommended.
2.4	16	In some instances, an alternative form of reporting may be acceptable for certain portions of the requirements to prevent a TREES Participant from duplicating efforts.	In terms of proposed language, we suggest that the TREES should build on existing REDD+ agreed language and refer to Reference levels in the UNFCCC context.
3.3	19	HFLDs	Under the current conditions it seems dangerous for an HFLD country to participate in TREES: 1. because they are unlikely to have ERs, especially if the reference period is 10 years, and 2: because of the automatic 20% deduction after 5 years. In particular, no technical justification is given for this deduction. Currently, a HFLD country submitting to TREES would have lower future incentives to participate in REDD+.

3.4	20	Additionality	We believe the term is confusing in this context and should be changed since this section refers more to ensuring no-double counting.
4.1.1	22	We suggest to consider the following changes: □□Resulting area estimates and confidence intervals should be reported, as well as choices made in the sampling design (overall sample size, point distribution, use of a buffer), and response design (e.g., source of imagery and labeling protocol, interface for collection and quality assurance and control) should be reported in detail, and the quantity and deviations from the stratified random sampling design should be reported. □□The map used for the stratified area estimation should be created through a robust change detection approach, in order to ensure a minimum quality for the change map. It should be visually inspected, and obvious errors should be corrected before applying the stratified area estimation. □□The minimum mapping unit for remote sensing imagery must enable tracking forest and land-use changes at the detail required by the forest definition; deviations will be expected to create systematic errors that must be duly quantified. The MMU should also be reflected in a consistent way inside the Stratified Area Estimation response design	
4.1.2	24	In cases where the national forest inventory uses annualized accounting of post-deforestation carbon stock changes, the same approach shall be used under TREES.	Replace national forest inventory with GHG inventory
4.5	26	Pools not listed here are excluded, including for example harvested wood products.	HWP is not a pool according to IPCC
5.1	27	A conservative approach is applied whereby, beyond an allowable uncertainty (15% at the 90% confidence level) the Crediting Level is reduced by the calculated percentage uncertainty.	We suggest that TREES should build on existing REDD+ agreed language and refer to Reference levels in the UNFCCC context. It should be noted that this approach unfairly penalizes countries whose forests show higher heterogeneity. It would seem unlikely that countries will be able to meet such threshold.

5.1	27	A conservative approach is applied whereby, beyond an allowable uncertainty (15% at the 90% confidence level) the Crediting Level is reduced by the calculated percentage uncertainty.	For transparency we believe it would be beneficial to at least include a requirement to assess and report the uncertainty around emission reductions
5.1	27	The TREES Crediting Level shall be updated every five years (starting with the first year of crediting) and, following the initial crediting period, shall be subject to an exogenous fixed decrease at each update. Following the initial crediting period, the TREES Crediting Level shall represent a 20% reduction below the Crediting Level from the prior crediting period.	In case a country successfully reduced emissions this ambition will be included in any update since the new historical data includes the results. In case a country did not manage to perform yet, this requirement is likely to exclude the participant from future participation.
7.2.1	36	Leakage assessment tool	Currently a leakage deduction is merely based on the scale covered by the FRL, however in case there is also performance at the national level, there would be no indication of leakage occurring.