



## **Forests for Life Partnership Submission to Public Consultation on ART TREES v.2.0 Revised HFLD Approach**

### **Introduction**

Forests for Life (FFL) is a partnership launched in September 2019 by five leading environmental organizations - the Wildlife Conservation Society (WCS), Re:wild (formerly Global Wildlife Conservation (GWC)), United Nations Development Programme (UNDP), World Resources Institute (WRI), and Rainforest Foundation Norway (RFN) – that together have programs across all the major intact forest regions of the world. Working with national governments, Indigenous Peoples, local communities and others we have two aims - to place ecological integrity at the heart of managing and conserving the world's forests and to halt and reverse declines in integrity across 1 billion hectares of the most intact forests worldwide.

The vision of the partnership is a world where the value of the ecological integrity of forests to humankind is universally recognized, loss of integrity has ceased, and the restoration of integrity is underway, in all cases taking full account of the rights and self-determination of Indigenous and local communities.

### **Response to the revised HFLD crediting level approach**

We reaffirm that HFLD areas must be considered an integral part of a comprehensive response to climate change and that successful protection of these areas deserves recognition. We believe that the results of efforts captured under the 'conservation of existing stocks' activity within the REDD+ framework have largely been overlooked or bypassed in the context of climate finance -- an oversight that should be corrected urgently. We recognize that conservation efforts reduce the risk of losing the irreplaceable carbon stocks and sinks in intact natural forests, and we note that many such forests are located in forest countries and jurisdictions that do not have sufficient capacity, particularly due to limited financial incentives to protect these forests from external threats. It is well-documented in scientific literature that some threats to forests emerge in places that have no recent history of deforestation. In many HFLD forest countries and jurisdictions, forests are under immediate threat from drivers such as pressure for economic growth and development, demographic trends, and global economic trends, with these threats exacerbated by intensifying adverse impacts of climate change. The combined emissions from these forest losses are significant: the carbon impacts from the loss of intact tropical forest between 2000 and 2013 have been grossly underreported and may be as much as six

times higher than previously thought, when calculated through a full carbon accounting that includes a wider range of degradation impacts as well as forgone carbon removals to 2050<sup>1</sup>.

In general, HFLD forest countries and jurisdictions that receive recognition and support for their conservation results are more likely to prevent, detect, and reduce such emissions. Therefore, we support provisions, like the revisions to the HFLD module of the TREES 2.0 consultation draft, which would increase the flow of finance to HFLD forest countries and jurisdictions that succeed in protecting their forest areas. Their success to date should not be taken for granted -- their lands are too valuable and the potential threats to forests too high to expect HFLD forest countries and jurisdictions to continue to keep their forests standing indefinitely without adequate financial incentives. Failure to recognize the results achieved by HFLD forest countries and jurisdictions would be a costly and irreversible mistake.

For these reasons, we see the revisions to the HFLD module of the TREES 2.0 consultation draft as a positive step. We support the intent of the revised approach to reward HFLD forest countries and jurisdictions that maintain their forest carbon stocks. We see clear advantages to the use of the HFLD score as a tool to scale the amount of credits that can be issued under TREES -- a superior approach to a simple binary determination of HFLD status. Furthermore, we see some near-term benefits from aligning the carbon stock threshold at 0.1% of standing forest carbon stock, which harmonizes this approach with others. While we also see some risk of locking in this arbitrary threshold indefinitely, we expect that this default value might be adjusted in subsequent iterations of the standard to reflect empirical assessments of forest carbon loss rates. For now, this approach is beneficial and conservative -- especially when combined with the other features of the standard.

We expect a host of new benefits to flow from the revised approach. Most significantly, forest countries and jurisdictions that are undertaking significant efforts to protect their remaining intact forests may be able to demonstrate results of those efforts through the TREES standard for the first time. These forest countries and jurisdictions include globally important forests, such as those in Gabon and Suriname. Among other benefits, the revised HFLD approach will provide an opportunity for forest countries and jurisdictions to be rewarded for resisting the pressures of international "leakage" driven by successful efforts to reduce deforestation elsewhere. This benefit underscores the interconnected character of forest protection around the world and it adds balance to the standard, which previously had only penalized forest countries and jurisdictions for their leakage risk but did not reward them for efforts to counteract this risk. We do not doubt that the revised HFLD module will lead to more robust protections for forests and will ultimately result in lower emissions in the future than would otherwise be the case. We view this as an undeniable and real climate mitigation benefit. Furthermore, we recognize the many environmental and social co-benefits that will continue to flow from these protected forest ecosystems.

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<sup>1</sup> Maxwell *et al.* (2019) Degradation and forgone removals increase the carbon impact of intact forest loss by 626%. *Science Advances* 2019;5: eaax2546

We are aware that others may raise concerns about the integrity of the credits generated under the revised HFLD approach, but we do not share this concern. In part, we are reassured by the fact that TREES is designed to support jurisdictional approaches to REDD+. Jurisdictional approaches are holistic in nature and they establish their credibility and integrity through the results achieved across their whole area, rather than in specific locations. We are also looking at the TREES standard as a whole, including the many protective layers and procedures already within it. We are cognizant that the HFLD module does not operate in isolation from the other components of the standard; rather, it is an element that is subjected to the same provisions as those that assure environmental integrity and conservative crediting from other REDD+ activities. The revised HFLD module simply expands the recognition of results to include the conservation of forest carbon stocks, in keeping with the Warsaw Framework for REDD+.

For these reasons, we believe that the revised HFLD module -- in the conservative context of the overall standard -- will allow forest countries and jurisdictions to generate credits with a high degree of environmental integrity. As an added benefit, finance that flows to HFLD forest countries and jurisdictions from these credits will help to support and backstop the integrity of credits generated in other forest countries and jurisdictions, since they will help to prevent these results from being undermined by "leakage". Thus, our view is that HFLD credits will reinforce the overall TREES system and make all the results more robust -- not just those results that occur in HFLD forest countries and jurisdictions. Put another way, we believe that the whole world benefits when forest carbon stocks in HFLD forest countries and jurisdictions are worth more alive than dead.

## Conclusion

We would like to express our appreciation to the ART Board and TREES Secretariat for their efforts to continually improve the TREES standard. We would also like to acknowledge all of the groups and forest countries and jurisdictions who contributed to the consultation process, as their efforts undoubtedly have strengthened the outcome. Finally, we affirm our ongoing appreciation and support for the stewards of the forests -- in HFLD forest countries and jurisdictions and elsewhere -- who we hope will directly or indirectly benefit from this revision to the standard. We stand ready to assist and collaborate with anyone who shares our goals of protecting intact forests and rewarding the ongoing climate mitigation benefits they deliver.