

Comments from the Methods and Guidance Component of the Global Forest Observations Initiative

Thank you for the opportunity to comment on the TREES standard. In conducting this review, the Standard Document was read with interest in combination with viewing of the recorded Webinar dated 20th August 2019 available online.

The review of the document was systematic and as such comments on the text are presented under each heading of the Standard. General comments on terminology are presented at the end of this document.

The comments provided are limited to aspects of the standard that pertain to methodological and technical guidance and are made in the context of the existing good practice guidance and the ART claims of 'more precise technical requirements' resulting from the application of the standard; as stated in the online webinar communication material. Finally comments are made where it was felt that there was a lack of information or clarity in the information provided.

No comments on the program structure itself are elaborated here unless they effect methodological elements. Comments therefore do not relate to nor should be taken as support to the ART program as such, nor about the issues that may arise in relation to the UNFCCC REDD+ process.

Carly Green

MGD Component Manager

María José Sanz Sánchez

MGD Advisory Group Chair

Section 1 – Introduction

Sub-section 1.1

TREES has been designed to ensure that all ART credits issued are real, measured, permanent, additional, net of leakage, verified by an accredited independent third party, and are not double counted.

The standard does not ensure permanence. There are measures/requirements listed related to permanence, **but these do not ensure permanence.**

Sub-section 1.2

No Comment

Sub-section 1.3

No Comment

Section 2 – ART cycle

Sub-section 2.1

No Comment

Sub-section 2.2

No Comment

Sub-section 2.3 – Crediting Period

The use of 'date' throughout the standard should be changed to 'Year' as methodologically the generation of activity data is on an annual basis and is best generated by a mosaic of all available data. Throughout the standard 'start date', 'date' and 'calendar year' are used and it is not clear if they are used interchangeably or mean different things. The terminology should be standardised or at least clearly defined if they indeed mean different times.

'*submission date*' was taken to be an ART program construct and '*calendar year*' to be an accounting construct. "Start date" is confusing and problematic in the accounting construct and it is suggested that it is avoided. Crediting period has clearly been elaborated as "one calendar year or two calendar years" (Section 2.5) and therefore this suggests the 'start date' is actually the 1 January of [year selected].

Sub-section 2.4

Documents are listed in this section. Adding an outline of each documents purpose would improve communication.

Additionally, in Section 3.2 a document called 'REDD+ Implementation Plan' is required to be submitted. This is not listed in this section.

Section 3 – Eligibility/Applicability/Key Requirements

Sub-section 3.1.1

Why was there a 90% 'national forest cover' limit applied to the concept of National Level reporting, why not 100%? This would leave room for less accurate reporting of emissions from deforestation and forest degradation as 10% of the forest cover can be excluded.

Boundaries of subnational accounting shall correspond with one or several administrative jurisdictions no more than one level down from national level and scale (Encompass an area of at least 6 million hectares OR Encompass an area of at least 4 million hectares AND represent at least 30% of the national forest area).

The restrictions on sub-national inclusion would seem to exclude countries due to the boundary requirements. Are countries who nationally have less than 6 million hectares eligible to join TREES?

Sub-section 3.1.2

Summary Information Reports relate to safeguards reporting in the UNFCCC reporting framework. Should the requirement to '*submit annual UNFCCC Summary of Information reports*' actually be Biennial Transparency Reports as NDCs are referred to in the same sentence?

Sub-section 3.2

'Emission Removals' is not a common term used. The term in this context is simply 'Removals'. Maintaining consistency in terminology is very important to reduce confusion and misrepresentations. Please consider this throughout the standard.

It is stated that the country can submit the REDD+ Action Plan or Strategy developed for the UNFCCC as its *REDD+ Implementation Plan* under TREES. The REDD+ Action Plan or Strategy is unlikely to have the level of detail required by TREES (eg. locations planned to achieve the ERs). Does TREES require interventions to be spatially delineated? This is ambiguous.

Sub-section 3.3

See comments in Section 9

Sub-section 3.4

This section refers to '*Emission Performance*' and this term is not used again in the standard. Suggest replace with the Emission Reductions (ERs) metric which is used throughout the standard.

This section is mixing the concepts of additionality and double counting. This adds confusion. Suggest if Additionality needs to be even covered here that the first sentence is sufficient and unambiguous.

The double counting discussion is covered in sections on the Registry so does not need to be stated in the Additionality section.

Sub-section 3.5

Suggest adding the following: 'The forest definition or definitions listed in the TREES Registration Document ~~must~~ **should** be consistent with the most recent definition used by the national government in reporting to the UNFCCC. If it is different then it should be transparently explained.'

Countries may change their forest definition historically used in National Communications (i.e. 10% canopy cover) as they become more aware of the challenges of mapping such thresholds (i.e. using Landsat which is the only real choice for historical time series). There is no benefit in locking them into definitions based on potentially old National Communications that have not relied on datasets generated from modern remote sensing.

Sub-section 3.6

No Comment

Sub-section 3.7

No Comment

Sub-section 3.8

No Comment

Section 4 – Carbon Accounting

The correct terminology is ‘most recent Intergovernmental Panel on Climate Change **guidance and guidelines**, as adopted or encouraged by the Conference of the Parties’.

What is meant here by “**except where other methods are explicitly allowed under the Standard**”. What is the scope of other methods allowed by the standard; this suggest that methods inconsistent with IPCC can be applied? How does this then ensure the integrity of the credits that is frequently referred to throughout the standard.

Please use the term **IPCC Guidance and Guidelines**. One presumes when the term *IPCC Guidelines* is used in TREES that reference is being made to the IPCC Guidance and Guidelines as reference will be to 2003 GPG and 2006 Guidelines and the 2019 Refinement to the 2006 Guidelines.

The footnote 5 should refer the Global Forest **Observations** Initiative Methods and Guidance **Document**. The other 2 listed documents are not updated since the Warsaw and Paris decisions nor have a basis in operational NFMS methods.

Sub-section 4.1

This specification is not consistent with the IPCC Guidance and Guidelines as this would exclude a country who wishes to report using Tier 3 methods which do not (generally) apply such simplified linear methods. Is this the intent to exclude Tier 3 methods?

Sub-section 4.1.1

Quality assurance shall result from the implementation of hot, cold, and blind checks. Blind checks shall derive measurement and data entry errors.

Whilst this is best practice, much of the data available to countries may not be able to meet these requirements or (in the case of Activity data) other QA/QC procedures are used. Suggest that demonstration of QA/QC procedures be required but remove the specification of the method.

This section on Activity Data moved from a set of requirements to a method. This section is too specific and presents a method that can only allow the reporting of Approach 2 activity data which voids the earlier statement that it can be either Approach 2/3.

The bullet point specific methods for generating Activity Data have presented a number of challenges for REDD+ countries to date and work is ongoing to improve methodological guidance. The IPCC 2019 Refinement was more general in the requirements because of the lessons learnt so far from application of the proposed method here.

Methods in the field are changing and advancing rapidly. As this is a Standard opposed to a methodological document it is recommended that the specific method is not required as is consistent with the Emission Factor section of the Standard. It should be left to the country to demonstrate conformance with IPCC Guidance and Guidelines and other best practice documentation such as the GFOI MGD.

To be consistent with the section on Emissions Factors the following should be added to the Activity Data section:

The TREES Monitoring Report must provide descriptions of the methods used to establish **Activity Data**, with sufficient details to enable replication by a verifier. This includes:

- SOPs for all measurements, calculations, and sample designs
- Verifiable training procedures
- Quality Assurance/Quality Control (QA/QC) procedures for all measured data (including hot, cold, and blind checks)

Sub-section 4.1.2

The level of specificity of emission factors is not consistent with that for Activity Data which further justifies the suggestion to reduce the methodology specification for Activity Data.

It is not clear if the text on 'Inclusion of Errors' requires only the reporting of such errors or their inclusion in the quantification of uncertainty.

The treatment of post-deforestation land use carbon stock dynamics does not lead to **more technical precision** (as outlined in the webinar presentation) and is not consistent with the IPCC Guidance and Guidelines which the Standard asserts the methods presented are.

Sub-section 4.2 – Stratification

No Comment

Sub-section 4.3 – Land based versus Activity Based Accounting

'Uncertainty analyses must be able to determine the uncertainty associated with both activity data and emission factors for both land-based accounting and activity-based accounting'.

This is ambiguous as it reads like the country **must** conduct (and presumably report) uncertainty associated with BOTH Land Based AND Activity Based ERs.

Presumably they only report uncertainty for the accounting approach they choose.

This sentence/requirement needs editing for clarity.

Sub-section 4.4 – Scope of Activities

No Comment

Sub-section 4.5 – Scope of Pools and Gases

Footnote 12 (sub-section 4.1.2) suggests that Harvested Wood Product can be included. This section clearly states they cannot. Please clarify if HWP are included or not.

Section 5 – Crediting Level

Sub-section 5.1

“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.”

IPCC good practice states that “Good practice requires the use of a 95 percent confidence interval for quantification of random errors”. The 95% confidence interval is always used in the estimation of uncertainty in the IPCC guidance and guidelines. Why require the 90% confidence interval?

Estimation and Accounting should not be confused. Accounting rules should be applied transparently after the estimations are provided in accordance with IPCC Guidelines and Guidance.

Sub-section 5.2

This is an accounting construct, so No Comment is made.

Sub-section 5.3

This is an accounting construct, so No Comment is made.

Section 6 – Monitoring

No Comment

Section 7 – Reversals and Leakage

This is an accounting construct, so No Comment is made.

Section 8 - Uncertainty

*“The credibility of TREES and ART rest upon the standard’s requirement that **numbers** presented are **accurate and precise**”.*

The level of conservativeness throughout the standard does not necessarily lead to accurate estimates. So this statement may be misleading.

Additionally, no obvious requirements in the document address levels of precision. If this has been missed in this review then it is suggested that stronger links should be made between the standards requirements and the subsequent result of *accurate and precise numbers* (noting that the term **numbers** could be replaced with **estimates** or similar descriptors).

The claims in the document suggest that the application of the standard would lead to 'higher quality' estimates, however the estimates are no more accurate or precise than the complete application of the IPCC guidance and guidelines and the 'accounting' construct is conservative and therefore the final estimates are conservative rather than accurate.

Finally, as noted above, why require the 90% confidence interval when the IPCC state it is good practice to report uncertainty using the 95% confidence interval?

Section 9 – HFLD countries

HFLD countries are to demonstrate *'for each of the years in the historical reference period'* that they do not breach the % deforestation threshold.

The methods outlined in the standard do not require annual land use change determination and annual data is inferred from a minimum of three points in time over the historical period. How would the country demonstrate that the threshold was not breached in any one year? Clarity is required in terms of the TREES **more technical precision** claim as outlined in the webinar presentation.

Section 10 – Calculation of Emission Reductions

This is an accounting construct, so No Comment is made

Section 11 - Variance

Variance is generally used in this field to relate to data variability and providing an estimate of accuracy. Suggest using another word, like 'Deviations from the Standard' or any other word that is not associated with statistics.

Given that methodological changes are allowed this only serves to further support the comment related to Section 4.1.1 which was a suggestion to reduce the methodology specification for Activity Data as it will become outdated.

Section 12 – Environmental, Social and Governance Safeguards

No Comment is made

Section 13 – Avoiding Double Counting

This is an accounting construct, so No Comment is made

Section 14 – Validation and Verification

No Comment is made

Section 15 – Registry Requirements

No Comment is made

Section 16 – Complaints and Appeals

No Comment is made

General Terminology

Please be consistent with the use '*shall, should, must*' and define the terms. If *shall* means *must* please use only one term.

In the definitions it would be useful to explain for countries what the specific differences are between a Forest Reference Emission Level and a Crediting Level (if there are any, other than that you specify the accounting to be applied).