

German Federal Ministry for Economic Cooperation and Development (BMZ)

Comments for the public consultation Process for The REDD+ Environmental Excellency Standard (TREES):

First, we would like to state that we welcome the notion of introducing a transparent REDD+ standard with high environmental integrity to incentivize increased funding from private sector. We hope that the development of TREES, will also lead to more and more REDD+ countries thriving for this higher level of ambition to become credible partners in any future REDD+ architecture.

Crediting Baselines: We do understand the idea 20% reduction every five years to increase ambition in emission reductions over time. However, it requires countries to be almost immediately successful in reducing deforestation otherwise the constantly increasing level of ambition results in a high barrier for subsequent periods. We would propose a different approach: update the crediting base line every 5 years with the most recent 10 year historical average (rolling average), whereby the crediting baseline cannot be higher than the previous crediting period. Thus successful reductions (and payments) would result in higher ambition without discouraging countries that have a harder start.

Safeguards: to ensure highest environmental and social integrity, an operational Safeguards Information System should be a requirement, and to have submitted at least one regular Safeguards reports to the UNFCCC.

Reversal Buffer: It is unclear what happens to the program and the buffer if a reversal exceeds the total ER amount in the buffer. We would recommend to use a similar approach as in the FCPF Carbon Fund where the negative balance has to be replenished before further credits can be issued.

Variance: We welcome the pragmatic approach to allow variances to the standard in cases where this contributes to higher accuracy and integrity.

Registry: How can a steady (automatic) communication between the ART registry and other existing registries be guaranteed? What is the rationale for developing and managing its own registry system instead of utilising/integrating an existing one e.g. the Worldbanks CATS - Carbon Assets Trading System, (scheduled to be online from October 2019).

Benefit Sharing. TREES does not include framework requirements for Benefit Sharing. What is TREES approach to Benefit Sharing?

Bonn, 25.9.2019