

PUBLIC COMMENT ON TREES 2.0

Overarching Comments:

Feasibility

The Nature Conservancy (TNC) and Conservation International (CI) commend the Secretariat's continued work to expand the TREES standard and make it available to Indigenous Peoples and to Participants with High Forest, Low Deforestation and carbon removals. However, we would like to reiterate our comments made to TREES 1.0: the TREES standard sets a very high bar which will be difficult to meet without sophisticated technical capacity and long-term institutional commitments of resources. Additional consideration should be given to ensure that readiness resources be made available to developing countries.

Specific Comments:

3. Eligibility/Applicability/Key Requirements

Indigenous Territories

We welcome the new inclusion of Indigenous Territories as a recognized form of a subnational accounting area. However, the requirement that subnational accounting areas encompass at least 2.5 million (M) hectares (ha) seems as though it would exclude most Indigenous Territories. We recommend that this restriction be removed. In most countries, Indigenous Peoples are often granted unique sovereignty arrangements and it makes sense for Indigenous Peoples to be recognized as capable of direct application to and management of a TREES program. Placing a 2.5M hectare limit runs counter to the recognition of this autonomy.

Role of Nested Projects

We agree with ART's statement about the importance of working with the private sector, communities and other stakeholders to implement a successful program, and the reference to recognizing various nested approaches.

5. Crediting Level

Removals

We support the inclusion of removals in TREES 2.0, especially removals occurring in natural forests. This approach brings ART/TREES into synch with the NDC guidance for the Paris Agreement. However, we would like to see a clearer articulation of what, if any constraints, TREES 2.0 would place around these. For example, would the conversion from non-forest to commercial forests be acceptable?

HFLD

We support the inclusion of HFLD guidance in TREES 2.0. However, it would be useful to better understand how successful the proposed guidance would be at incentivizing efforts within HFLD countries. When comparing the HFLD crediting from Table 4.9 of the 2019 IPCC Refinement with the uncertainty calculation in the Refinement table, it seems unlikely for an HFLD country to be able to issue credits.

8. Uncertainty

Uncertainty Update

We recognize the difficulties uncertainty raises, especially with larger-scale programs which frequently have higher levels of uncertainty. The TREES standard should seek to ensure high environmental integrity while also realizing that stringent requirements may be impossible for countries to meet without additional capacity building and other resources (see our overarching comments about feasibility). We recommend that a process be put into place to assess and deal with uncertainty rather than excluding programs. Risk assessments, set-asides, and other tools already exist and can be utilized to continue country progress while mitigating the effects of uncertainty.

13. Avoiding Double Counting

Double Claiming

The guidance around double claiming in the summary of changes compared to the actual updated text in the 2.0 standard are contradictory. We would recommend using the summary text in lieu of the existing text in the standard.

In the standard text, it states: “Double claiming occurs when... voluntary market transfers are counted toward both corporate buyer pledges and supplier country NDCs.” Later in the paragraph, it continues: “At present, voluntary market transactions do not require corresponding adjustments.”

- ➔ This text seems to say that all international voluntary credit transfers amount to double claiming but that corresponding adjustments are not required at this time.

In contrast, the summary text states: “...recognizing that international requirements for Corresponding Adjustments to avoid double counting under the Paris Agreement Article 6 are still being negotiated, that the infrastructure for countries to account for Corresponding Adjustments is not yet in place, that there will be a transition period for the Paris Agreement rules and infrastructure to be in place, and that and that Corresponding Adjustments may not be required for all potential agreements that ART Participants may enter into.”

- ➔ This text doesn't make a broad statement about double claiming. Instead, it stresses the transitory period we are in and notes the many variables that need to be decided before a corresponding adjustment is possible. Finally, it seems to say that corresponding adjustments might not be required for every agreement.

The summary text seems to offer a more nuanced understanding of corresponding adjustments, and we support this text.