

Comments TREES (draft)

To the authors of the ART/TREES,

Thank you for the opportunity to participate in the review of the draft ART/TREES. I support the purpose, intent and objective of this initiative and my comments are meant to be constructive, to strengthen its effectiveness, in operation and reception. In the same spirit as the development process of the standard, I am providing these comments in my personal capacity. My comments are few and brief, partly due to the fact that the document is well written and partly out of necessity.

Sincerely,  
Peter Graham

Climate Advisers Trust

September 30, 2019.

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## Section 1.1

1. “Recognize countries with quantifiable ERs that result from slowing, halting, and reversing forest cover and carbon loss and maintaining forest carbon stocks;”
  - It should also recognize quantifiable ERs from activities that increase carbon stocks (the Plus), such as afforestation and reforestation (A/R), as on a landscape scale, and in several countries. Such activities represent significant mitigation potential and can be strategically effective when combined with efforts to reduce deforestation at a landscape or jurisdictional level. Many protocols for A/R exist, which could be modified to fit into the ART/TREES.
  
3. “Embody high environmental integrity, which includes accounting for the uncertainty of data and the risks of leakage and reversals, the avoidance of double counting, and result in issued units that are interchangeable with ER units from other sectors;”
  - It might be reasonably assumed that the use of the work “accounting” in this context implies accounting for changes in emissions and removals relative to a baseline or reference level. In that context, it is not the “risk” of leakage and reversals that should be accounted for, but the occurrence. Where the actual emissions and removals displaced cannot be readily measured with any reasonable degree of confidence, then an accounting approach (such as the ‘discount’ method included in this standard) is appropriate.

## Section 3.1.1

- “...accounting shall be at a national level.<sup>1</sup> [footnote] Defined as ≥90% of all areas in the country qualifying as forest under the national forest definition as described in Section 3.5.”
  - This would seem to imply that a government could exclude 10% of its forest area from accounting at the national level.
  - Did I miss a section stating how the country needs to explain ‘why’ it is reporting on less than 100% of its forests area?

#### Section 3.1.2

- It should be stated explicitly that forests (as part of AFOLU) must be included in the countries National GHG inventory Reporting

#### Section 3.3 (and related HFLD sections)

- “It is the intent of ART to establish a robust approach to explicitly address this category and credit HFLDs in a manner consistent and fungible with credits from other REDD+ activities or other carbon markets”
  - It is regrettable that this version of TREES was not able to include a robust methodological approach to suit the HFLD circumstances.

#### Section 3.4

- “Further, once countries have emissions accounted under this Standard in their Nationally Determined Contributions (NDCs), transferred GHG reductions from this sector (to another Party for use toward its NDC or to a non-Party, such as a voluntary buyer, an airline or a capped entity, for use toward ER targets) must be adjusted to avoid double claiming between NDC accounting and ART ER transactions per requirements in Section 13.”
  - The wording of this part of the paragraph is confusing and possibly misleading.
  - Should this not be, more simply, *“Further, once countries have received ART Credits for verified ERs and transferred them to a buyer (to another Party for use toward its NDC or to a non-Party, such as a voluntary buyer, an airline or a capped entity, for use toward NDC targets), the seller must make a corresponding adjustment to its NDC accounting to avoid double claiming a buyers’ purchased reductions.”*

#### Section 4.1.1

- “Analyses must identify cyclical systems such as timber or tree crop harvest rotations and shifting cultivation/fallow systems such that deforestation (or emissions following temporary tree clearing for tree harvest systems) from these activities is not counted more than one time. That is, the first conversion in such a cyclical system will be calculated, net of post-harvesting regrowth; any subsequent increases or decreases in canopy cover or tree stocks during harvesting cycles—short of permanent reforestation—shall not be accounted in activity data reporting.”
  - This appears to run counter to good practices of reporting emissions and removals when and where they occur.
  - This approach works when the harvest and regrowth/reforestation cycles are regular – and managed sustainably.

#### Section 5.1

- “The reference period may not overlap with and must be immediately adjacent to the start of the TREES crediting period as defined in Section 2.3.”
    - I agree that the reference period should be as close as possible to the start of the crediting period, without overlapping. But, due to data availability, there may be 2 or more years between forest monitoring / activity data collection. Does “immediately adjacent” accommodate such data gaps?
  - Regarding the “exogenous fixed decrease at each update” (including Equation 4)
    - Equation 4 appears to ignore an update in the Crediting Level in Crediting Period n+1, taking into account, in the 10-year average, the actual emissions during Crediting Period n. On re-reading the relevant sections and equations, it becomes apparent that the reference level never changes as a function of time. Barring any changes in area, scope of activities covered, and ‘technical updates’. And, this is replaced by the “exogenous fixed decrease”.
    - I can see how this creates an additional incentive to reduce emissions as quickly as possible. However, it may also render the monetary incentive ineffective. Are any other sectors treated in the same manner?
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