



March 15, 2021

Dear SBTi Net-Zero Criteria Secretariat:

Thank you for the opportunity to comment on SBTi's Net-Zero Criteria Draft. We support SBTi's goal to develop rigorous, science-based corporate net-zero targets that will accelerate corporate climate action, and we appreciate your efforts towards this end.

We the undersigned organizations – founding partners of the [Green Gigaton Challenge](#) – feel strongly that the draft criteria as they stand will slow global progress towards net zero by hindering action on large-scale reduction of emissions from deforestation and forest degradation (REDD+).

We feel strongly that compensation based on rigorous standards for jurisdictional REDD+ should count towards interim targets along companies' pathway to net zero for the following reasons:

- **Emissions reductions from nature are an urgent, effective, and essential near-term mitigation opportunity.** There is no plausible pathway to global net zero that does not involve protecting nature. Deforestation currently contributes 10-15% of global emissions, more than the entire EU.¹ Immediate action to reduce these emissions must be prioritized as long as tropical deforestation continues. Prioritizing efforts to protect existing ecosystems is also important because removals are often done via fast-growing monocultures for productive extraction – which doesn't bring the same co-benefits as avoiding destruction.
- **Achieving net zero for companies' scope 1-3 emissions will not achieve net zero for the planet.** A science-based Paris-aligned decarbonization trajectory for the planet requires not only decarbonization of companies' own scope 1-3 emissions, but also aggressive action to support abatement from natural climate solutions, most urgently to eliminate tropical deforestation within the decade. Reducing emissions from deforestation is a time-limited opportunity that is essential for meeting the goals of Paris. It cannot wait until companies have reduced other emissions. That will simply not lead to a science-based trajectory for the planet. Encouraging companies to support this abatement through purchases of high-quality emission reduction credits will provide critical finance necessary to maintain the world's carbon sinks. This must not and will not substitute for the required ambitious decarbonization in hard-to-abate sectors and within companies' own production and value chains.

¹ [By the Numbers: The Value of Tropical Forests in the Climate Change Equation](#). World Resources Institute. David Gibbs, Nancy Harris and Frances Seymour, October 04, 2018.

- **One of the highest-value actions companies can take as part of achieving global net zero is to purchase high-integrity credits from jurisdictional REDD+ programs.** Private-sector capital will be essential to stem ecosystem destruction, as protecting nature often has no alternative revenue streams. A market-based approach also allows the flexibility that companies need to increase their ambition and accelerate the global transition to net zero.
- **The jurisdictional approach directly addresses quality issues and limitations experienced in the past with forest-based credits.** By working across entire regions, and using the tools available to governments, a jurisdictional approach ensures that emissions reductions are real and long-lasting, and that deforestation isn't merely shifted. Rather it is actually reduced. Jurisdictional REDD+ is a large-scale tool with massive potential – both to reduce emissions as well as to protect biodiversity and support local livelihoods – that should be utilized on the path to global net zero.

Thank you for your consideration of this input. We would be happy to discuss any of these points further and work with you to ensure that the net-zero criteria and guidance maximize ambition of corporate climate action in a way that contributes to the goal of global net zero.

Sincerely,



Eron Bloomgarden
Executive Director,
[Emergent](#)



Mario Boccucci
Head of the Secretariat, [UN-REDD Programme](#)



Ruben Lubowski
Chief Natural Resources Economist,
[Environmental Defense Fund \(EDF\)](#)



Rupert Edwards
Senior Advisor,
[Forest Trends](#)



Mary Grady
Executive Director,
[Architecture for REDD+ Transactions \(ART\)](#)