

Joint Submission for TREES 3.0

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Attached are:

Annex I- Safeguard Implementation Guidance for ART TREES 3.0 (Section 12)

Annex II- Guidance Note: Developing a High-Quality REDD+ Safeguard Information System (SIS)

Executive Summary

This joint submission responds to the ART Secretariat’s consultation on the draft **TREES 3.0** standard, focusing on strengthening its provisions for **social integrity** as jurisdictions move from retrospective crediting to forward-looking implementation. Drawing on extensive field and policy experience with jurisdictional REDD+, we provide detailed recommendations in five key areas:

1. **Safeguards (Section 12):** Amendments to clarify and operationalize safeguard requirements, complemented by a proposed Safeguard Implementation Guidance to ensure consistent interpretation by Participants, validators and verifiers.
2. **Emission Reduction & Removal (ERR) Rights (Section 3.4.1):** Stronger requirements for comprehensive tenure assessments (statutory and customary), enhanced transparency and explicit FPIC where rights-holders may be affected, and clear recognition of nested projects and community-led initiatives.
3. **Benefit Sharing (Section 3.4.2):** Enhanced transparency and equity requirements, including public disclosure of benefit-sharing plans, systematic monitoring of disbursements, and disaggregated reporting to demonstrate inclusivity.
4. **Stakeholder Engagement & Safeguard Information Systems (Sections 2.6, 3.1.2):** Clearer expectations for domestic consultation, participatory oversight, and robust SIS design covering all Cancún safeguards with active links to grievance redress.
5. **Grievance Redress Mechanism (Section 16):** Strengthened provisions to align with international best practice, including accessibility in multiple languages, protection against retaliation, independence of reviewers, and provision of timely and legitimate remedies.

Collectively, these refinements ensure that TREES 3.0 safeguards are not treated as retrospective compliance but embedded as **real-time operational requirements**, giving confidence that ART-issued credits are both environmentally robust and socially legitimate. We also recommend sequencing: finalizing TREES 3.0’s core provisions before introducing **Beyond Carbon Benefits (BCB)** certification, to ensure co-benefit claims rest on a strong foundational standard.

Introduction

We appreciate the opportunity to provide input to the **Architecture for REDD+ Transactions (ART)** Secretariat’s public consultation on the draft **TREES 3.0** standard. This update comes at a pivotal moment: after several years of ART’s operations and following the first issuance of TREES credits, jurisdictions are transitioning from **retrospective crediting** of past emission reductions to **forward-looking implementation** of new REDD+ programs. This shift makes the TREES 3.0 revision especially significant – the standard must not only recognize past results, but also guide high-integrity implementation going forward.

In this context, we commend ART’s commitment to periodically update TREES to ensure it remains a high-integrity global benchmark. The draft TREES 3.0 reflects lessons learned and stakeholder input, clarifying key provisions while reinforcing environmental and social integrity. Notably, the new draft strengthens social integrity provisions – those measures that safeguard communities, rights, and good governance alongside carbon results. For example, TREES 3.0 clarifies and streamlines the safeguards requirements (Section 12), adds explicit obligations on emission reduction and removal (ERR) rights and benefit sharing (Sections 3.4.1 and 3.4.2), and places greater emphasis on stakeholder engagement (Sections 2.6). These enhancements address a critical need as REDD+ moves to active implementation: ensuring that protecting rights, sharing benefits, and engaging stakeholders are treated as core, ongoing components of program delivery rather than as a one-time checklist.

Our joint submission accordingly focuses on recommendations to reinforce these social integrity elements in **TREES 3.0**. In particular, we offer constructive, evidence-based input on the following key areas:

- **Safeguards (Section 12):** Upholding robust social and environmental safeguards so that jurisdictional REDD+ programs “address and respect” all UNFCCC Cancun safeguards in practice, with clear requirements for their implementation and reporting.
- **Emission Reduction & Removal Rights (Section 3.4.1):** Clarifying how jurisdictions must demonstrate legal rights to all claimed emission reductions and removals, consistent with national law and respect for land tenure and Indigenous Peoples’ rights.
- **Benefit Sharing (Section 3.4.2):** Ensuring transparent and equitable benefit-sharing arrangements so that carbon finance and other REDD+ benefits are fairly distributed to Indigenous Peoples, local communities, and other stakeholders, in line with safeguard principles.
- **Stakeholder Engagement & Safeguard Information Systems (Sections 2.6, 3.1.2):** Strengthening requirements for meaningful stakeholder consultation and robust safeguard information systems to promote inclusive participation and accountability throughout program implementation.
- **Grievance Redress Mechanisms (Section 16):** Improving the existing mechanism to bring it into alignment with international best practices.

Drawing on our extensive engagement in jurisdictional REDD+ efforts, we present these comments in a constructive, collaborative spirit. The detailed recommendations that follow are grounded in on-the-ground experience, best practices, and international standards. Our aim is to support ART in refining TREES 3.0 to further bolster its social integrity provisions – helping ensure the standard delivers not only high-quality emissions results, but also equitable and positive outcomes for the communities and ecosystems at the heart of REDD+.

I. Safeguards

Context

Experience from early jurisdictional REDD+ programs demonstrates that safeguards can remain largely **theoretical**—documented for reporting purposes but not fully embedded in implementation—unless jurisdictions are equipped with **clear, context-sensitive guidance** on how to apply them in practice. In several cases, safeguard provisions were incorporated into program documentation without translating into concrete actions on the ground, due to uncertainty over what specific measures, processes, and evidence would demonstrate conformance.

This gap between safeguard *design* and safeguard *implementation* has direct implications for the integrity of jurisdictional programs. Without detailed operational guidance, even well-intentioned jurisdictions may default to minimal compliance—producing safeguard information only at reporting milestones, rather than integrating safeguards throughout the design, execution, and monitoring of REDD+ activities. This not only diminishes the potential of safeguards to protect rights, conserve biodiversity, and deliver social benefits, but also creates risks for Participants facing compressed timelines under TREES 3.0. Jurisdictions without clear guidance may struggle to complete Registration Documents within the two-year deadline (Section 2.5), leading to delays, inconsistent verification outcomes, and weakened investor confidence. Strengthening operational guidance is therefore essential—not only to ensure social and environmental integrity, but also to safeguard market trust and the timely mobilization of finance.

These early experiences underscore five critical needs to bridge the implementation gap:

1. **Further textual amendments to TREES Section 12** – clarifying its scope and aligning its requirements with international law and best practices, ensuring that expectations for both Structure/Process and Outcome indicators are explicit and actionable.
2. **Amendments to the associated guidance for Section 12** – providing detailed implementation guidance with step-by-step interpretation, examples, and verification benchmarks tailored to the diverse contexts of participating jurisdictions.
3. **Amendments to the Validation and Verification (V&V) Standard (VVS)**– updating verification protocols so that Validation and Verification Bodies (VVBs) apply the clarified safeguard requirements consistently, ensuring VVBs have clear, uniform criteria to confirm that safeguards are both addressed in program design and respected in practice.
4. **Amendments to program templates** – integrating the updated safeguard requirements into standard templates (e.g. program design documents, monitoring reports), thereby ensuring that jurisdictions systematically address and document safeguards at each stage of the program life cycle.
5. **Transparency is increased within the safeguard process** – so all stakeholders understand their responsibilities and expectations are managed when monitoring, reporting, and accountability processes are pursued.

Importantly, **the proposed amendments to the TREES safeguard indicators and corresponding ART VVS, guidance, and templates, are interdependent and must be implemented as a coherent package.** This ensures that the standard’s text, the VVS criteria, and the reporting templates all reinforce each other, providing a consistent framework for VVBs, Participants, and stakeholders.

Implementing these enhancements within TREES 3.0 would deliver multiple benefits:

- **Strengthened program integrity** – by making safeguards a live component of program management, not a retrospective reporting exercise.
- **Enhanced Indigenous and local community trust and interest in JREDD+** – through transparent, culturally appropriate, participatory, and verifiable application of safeguard commitments.

- **Consistent validation and verification** – by equipping VVBs with uniform benchmarks, reducing the risk of variable interpretations across jurisdictions and ensuring equitable assessment of safeguard performance.
- **Increased supply of high integrity JREDD+ credits** – by providing clear roadmaps for Participants to achieve conformance with TREES 3.0 safeguards.
- **Increased demand for JREDD+ credits issued by ART** – by increasing investor confidence in the integrity of those credits.
- **Risk mitigation and grievance handling** - by showing that better safeguard implementation reduces risk of conflict, reputational damage, or legal challenges for participants and buyers.
- **Alignment with international standards and buyer expectations** - clear operational safeguards will help ensure TREES credits remain aligned with ICVCM’s Core Carbon Principles, CORSIA eligibility and ESG due diligence frameworks used by institutional investors.
- **Efficiency and reduced transaction costs** - by providing jurisdictions with templates, benchmarks, and guidance reduces the time and resources required to demonstrate conformance.

As jurisdictional REDD+ expands under TREES 3.0, institutionalizing all of the above improvements will help ensure that *results-based payments are matched by results-based safeguards*. This comprehensive approach strengthening the standard’s language, providing detailed guidance, updating VVS , and refining templates – will bridge the implementation gap, aligning safeguard commitments on paper with verifiable, tangible benefits and protections on the ground.

Section 12 - Safeguard Requirements

Based on joint field experience supporting REDD+ jurisdictions, we recommend a comprehensive set of amendments to **TREES 3.0 Section 12 (Environmental, Social, and Governance Safeguards)**. The objective of these proposed changes is to **clarify safeguard compliance- not complicate it**, making it easier for Participants to understand what is required and to demonstrate conformance.

By sharpening the wording of safeguard themes and aligning reporting requirements with practical implementation, these amendments will help jurisdictions more effectively “address and respect” the Cancún safeguards in practice (i.e., demonstrate not only the legal, policy and institutional arrangements to *address* the safeguards, while also demonstrating *respect* through actual, effective and measurable implementation). This, in turn, will reduce ambiguity, lower transaction costs, and support more programs in reaching credit issuance while upholding high social and environmental integrity. This alignment will not only strengthen fairness but also bolster market confidence, as credit buyers and financiers increasingly require evidence of robust social and environmental safeguards consistent with ICVCM and CORSIA integrity frameworks.

Each safeguard theme below is presented with:

- **Rationale:** The specific challenge(s) in the current TREES text and why amendment is needed.
- **Proposed amendment to TREES text (blue boxes):** Insertion-ready revisions, using **bold** for new insertions and **strikethrough** for deletions.
- **Validation, Verification, and Findings guidance (green boxes):** Insertion-ready additions to the ART VVS, including non-exhaustive but guiding examples of major and minor non-conformance. Also presented in bold.
- **Template adjustments (orange boxes):** Insertion-ready language for the TREES Registration Document (TRD) and Monitoring Report (TMR) templates to operationalize safeguard requirements. Also presented in bold.

This structured approach ensures that amendments are:

- **Internally coherent** across TREES, VVS, and templates;
- **Practical for jurisdictions**, focusing TRD reporting on structure/process indicators (with updates only if changes occur) and TMR reporting on outcome indicators during the crediting period; and

- **Aligned with the use country safeguard systems**, reinforcing use of existing national frameworks (laws, policies, institutions) rather than creating parallel processes.

Section 12.3- Reporting Requirements

Rationale

Section 12.3 of TREES lays out the reporting requirements for safeguards in the **Registration Document (TRD)** and the **Monitoring Report (TMR)**. The design principle, that structure and process indicators are assessed once in the TRD and only updated in subsequent TMRs if changes occur, while outcome indicators are the focus during each crediting period – is sound. This is aligned with the country’s safeguards systems approach, where safeguards frameworks (laws, policies, institutions) are relatively stable, but outcomes must be monitored and reported during each results period.

However, we note that Participants should be required to demonstrate conformance with both **structure/process** and **outcome** indicators of TREES before any credit issuance. Experience under TREES 2.0 showed that deferring outcome-level reporting until later periods weakened safeguards in practice, as credits were issued without verified evidence that safeguards had been respected. We appreciate ART’s efforts in TREES 3.0 to strengthen safeguard reporting, but notable challenges remain:

First – Interaction with Section 2.3 (Crediting Period). TREES allows Participants to set an initial crediting period up to four years before the TREES Concept is accepted. In such cases, safeguard reporting should apply only to actions within that backdated crediting period – not to activities that occurred before the crediting period began. Requiring outcome reporting on activities prior to the start of the crediting period would be inconsistent with results-based finance principles and would unfairly burden Participants with retrospective obligations that do not correspond to credited results.

Second – Outcome reporting must start in the first crediting period. TREES 2.0 allowed Participants to delay outcome reporting until the second crediting period, opening the door for Monitoring Reports with no evidence of safeguard performance and the issuance of credits without demonstrated social integrity. The removal of this delayed reporting in TREES 3.0 is commended. The final TREES 3.0, however, must fully close this loophole by being more explicit. Outcome indicators should be demonstrated from the first crediting period – whether that period is current or backdated – *and before any credits are issued*. This ensures safeguards are treated as operational requirements directly tied to credited results.

Accordingly:

- The TREES Registration Document (TRD) should be used to identify the qualitative and quantitative metrics that Participants will apply to monitor safeguard outcomes during the crediting period. (We note that the current term “context-specific desired results” is confusing and should be replaced with clearer language on metrics and monitoring approaches.)
- The TREES Monitoring Report (TMR) should then be the vehicle where Participants demonstrate actual conformance with TREES outcome indicators, using the metrics set out and validated in the TRD. This sequencing maintains clarity: the TRD establishes the system; the TMR demonstrates the results.

We also note the need for:

Clear metrics and system linkages: The current text does not provide sufficient clarity on the use of Participant’s **qualitative and quantitative metrics** to assess conformance with TREES outcome indicators and risks further repackaging of aspirational desired results and vague statements of impacts that are not precise and measured. It also fails to make explicit how information should be collected, reviewed, and verified. Stronger

linkages are needed with the Safeguard Information System (Section 3.1.2) and stakeholder engagement provisions (Section 2.6), ensuring safeguard information flows through established national systems and is accessible to stakeholders.

Alignment between national and subnational reporting: The intent of the current final paragraph of 12.3 is to clarify that safeguard indicators apply to all participants is valid, but its current wording is dense and risks confusion. Because TREES safeguard structure and process indicators are grounded in legal and institutional systems, subnational participants cannot only reference their own laws or processes in isolation – they must also demonstrate how these are aligned with, and consistent with, the national framework (including the international obligations of the nation (to which subnational jurisdictions must also comply). This ensures that safeguard implementation at the subnational level does not diverge from national commitments and avoids fragmentation of safeguard reporting across levels of government. The requirement should therefore be stated plainly: **all participants report against all the indicators, but for subnational participants in the case of structure and process indicators it means their reporting must reference and cover both subnational and national systems, demonstrating consistency between them.**

Proposed Amendment Section 12.3 TREES 3.0

Participants shall report on conformance with all Cancún Safeguards and, in accordance with the stepwise nature of REDD+ implementation, will report in a progressive manner through indicators established for each theme.

In their TREES Registration Document, Participants shall report and demonstrate conformance with all structure and process indicators. In addition, for the outcome indicators, Participants shall:

- ~~Demonstrate how any REDD+ actions listed in the REDD+ Implementation Plan that occurred prior to the start of the crediting period were developed and implemented in conformance with the outcome indicator and describe how the information was collected.~~
- ~~Describe the context specific desired results for any REDD+ actions that will occur during the Crediting Period to demonstrate conformance with the outcome indicator and how this information will be collected and reviewed.~~
- **Present the qualitative and quantitative metrics, monitoring approaches, and information sources that will be used to demonstrate conformance with TREES outcome indicators during the crediting period.**

In their TREES Monitoring Report, Participants shall report any changes to the information in the TREES Registration Document regarding the structure and process indicators that occurred during the reporting period. If no changes have occurred, the Participant shall note this. For the outcome indicators, Participants shall:

- ~~Provide a brief summary of how conformance has been demonstrated previously. The Participant shall note and explain if no new activities were required during the reporting period to maintain conformance with the indicator.~~
- ~~Summarize the information collected through the context specific desired results monitoring outlined in the TREES Registration Document for any REDD+ actions that occurred during the reporting period. The Participant shall note any changes to the monitoring that occurred. The Participant shall also note any changes to either REDD+ activities or the outcome monitoring that are planned because of the review of this information.~~
- ~~Describe the context specific desired results, monitoring approach, and information collected for any REDD+ actions that were new or changed during the reporting period and not included in the TREES Registration Document.~~
- **Demonstrate actual conformance with TREES outcome indicators for REDD+ actions undertaken during the reporting period, using the metrics and monitoring approaches established in the TRD. Reporting shall be limited to REDD+ actions implemented in the**

reporting period within the crediting period (whether current or backdated) and must include outcome-level evidence before any credits are issued.

- **Note where REDD+ actions or monitoring approaches have changed during the reporting period, describe these changes and provide updated information on metrics, monitoring methods, and results.**

A safeguards report template is provided for use by Participants as part of the TREES Registration Document and TREES Monitoring Report. However, Participants may utilize their Summary of Information reports prepared in the context of UNFCCC reporting or similar reports used on Cancún Safeguards outside the UNFCCC insofar all required information on required indicators is included and a cross reference is provided to ensure transparency on how the TREES indicators are reflected in the alternate report.

Safeguard Information Systems (SIS) in place shall serve as an important tool to provide data and information to demonstrate conformance. Participants should ensure alignment with Section 3.1.2 (National Reporting Requirements) and Section 2.6 (Stakeholder Engagement).

~~Participants may use Safeguard Information Systems in place as an important tool to provide data or systems information to demonstrate conformance as well. For the ease of subnational Participants under TREES, reporting and monitoring tools to demonstrate conformance with safeguards shall demonstrate coherence and/or alignment with national reporting and monitoring in the context of the UNFCCC.~~

All indicators apply to all Participants. Because structure and process indicators are grounded in legal and institutional systems, subnational Participants must report on both their own subnational laws, policies, and institutions, and on the applicable national/federal frameworks. Subnational Participants shall demonstrate how their systems align with and are consistent with the national framework, ensuring coherence with the country’s relevant commitments.

~~All indicators apply to all Participants. Where indicators reference a national program, framework or other requirement and a Participant is not a national government, the Participant must demonstrate how applicable subnational legislation is aligned and consistent with applicable national legislation.~~

Section 12.4 – Introductory Paragraph (Scope of International Conventions)

Rationale

The current text refers only to “relevant international conventions and agreements,” which leaves scope for varied interpretations and potential omission of key obligations. Where national laws and international conventions diverge, Participants shall apply the higher standard. These requirements ensure alignment with global integrity benchmarks, including the ICVCM Core Carbon Principles and CORSIA eligibility criteria.

The proposed amendment clarifies this scope by specifying explicit categories of treaties that jurisdictions must consider when implementing safeguards, including:

- **Environmental agreements** (e.g. UNFCCC, CBD, CITES, UNCCD);
- **Human rights instruments** (e.g. ILO Convention 169; the UN Declaration on the Rights of Indigenous Peoples, as the authoritative interpretation of State duties under binding human rights treaties such as the ICCPR and ICERD); and
- **Cross-cutting treaties** (e.g. the UN Convention Against Corruption).

By naming these categories, the amendment ensures that no essential international commitments are overlooked, particularly in areas such as biodiversity protection and Indigenous Peoples’ rights. The addition of a “higher standard” clause also aligns with Cancún Safeguard (a), which requires consistency with a country’s “international obligations,” and reflects best practice under international law: REDD+ activities must actively uphold and never undermine the treaty obligations of the country, even where domestic law falls short.

This strengthens both compliance and credibility, guiding Participants to design and implement safeguards in a manner demonstrably consistent with *all* applicable international commitments. It also provides clear expectations for Validation and Verification Bodies (VVBs), ensuring they assess safeguard implementation against the most protective standard in force.

Proposed Amendment Section 12.4 TREES 3.0

All indicators shall be implemented in accordance with relevant international conventions and agreements ratified by the Participant or the Participant’s country – **such as major environmental, human rights, and anti-corruption treaties – and shall** be anchored in domestic (and, if applicable, subnational) legal frameworks, policies, or processes. **Participants must comply with national law and obligations under international law, whichever is the higher standard (hereinafter “Applicable Law”).**

Proposed Amendment VVS for Section 12.4 TREES 3.0

Validation Scope

The VVB shall confirm that the Participant has identified and described all relevant international conventions and agreements ratified by the country, including major environmental, human rights, and anti-corruption treaties. The VVB shall validate that the REDD+ program’s legal and policy framework explicitly integrates these obligations, and that the Participant commits to applying the most protective standard (Applicable Law).

Verification Scope

The VVB shall verify, during each monitoring period, that REDD+ implementation remains consistent with both national law and international treaty obligations. This includes reviewing program activities, safeguard reports, and stakeholder evidence to ensure:

- No REDD+ activities have contravened a ratified treaty obligation;
- Where national law is weaker than international obligations, the higher standard has been applied in practice; and
- Any new or amended international commitments since validation have been integrated into safeguard implementation.

Findings (Section 3.6.3.4)

- **Major Non-Conformance:** Failure to identify and integrate relevant international obligations; evidence that REDD+ activities violated a ratified international treaty (e.g. human rights abuses, biodiversity treaty breaches); or reliance solely on weaker national laws where stronger international standards apply.
- **Minor Non-Conformance:** Incomplete documentation of relevant treaties, or minor reporting gaps in demonstrating consistency, provided there is no evidence of rights violations or environmental harm and corrective action is underway.

Proposed Amendments to the TREES Templates

Amendments to the TREES Registration Document (TRD) Template

Location: **Insert under Section 5: Legal and Institutional Context (or equivalent)**

Proposed Text (to be added as a new sub-section):

International Obligations

The Participant shall:

- **List all relevant international conventions and agreements ratified by the country—especially in the categories of environmental, human rights, and anti-corruption instruments (e.g., UNFCCC, CBD, ILO 169, UNCAC, UNDRIP (recognized as an authoritative interpretation of existing State duties and obligations with respect to Indigenous Peoples under international human rights treaties));**
- **Explain how each identified obligation is reflected in the program’s legal, policy, or procedural framework; and**
- **Demonstrate that, to the extent national law is less protective, the higher standard under international law (“Applicable Law”) is being applied in program design.**
- **Provide supporting evidence or references (e.g., legal texts, policy documents) to substantiate these commitments.**

Amendments to the TREES Monitoring Report (TMR) Template

Location: **Insert under Section 5: Legal and Institutional Context (or equivalent)**

Proposed Text (to be added as a new sub-section):

Ongoing Alignment with International Obligations - During the reporting period, the Participant shall:

- **Confirm that REDD+ activities continued to comply with both national law and applicable international treaties;**
- **Report any incidents where international obligations required a higher standard than domestic law—and how these were upheld;**
- **Document any new treaty commitments ratified since the Registration Document and how they have been integrated; and**
- **Provide evidence (e.g., program updates, stakeholder notices, revised policies) demonstrating ongoing adherence to the higher standard.**

Theme 1.1 – Consistency with the objectives of national forest programs

Rationale

Theme 1.1 ensures that REDD+ actions align with national forest policies and programs, as required by Cancún Safeguard A. In practice, jurisdictions often struggle to demonstrate this alignment in a concrete and verifiable way—for example, by clearly showing how their REDD+ strategy supports existing forestry objectives, contributes to national priorities, or resolves potential policy conflicts.

Clearer language is needed to emphasize that REDD+ implementation must actively support and integrate with national (and, where relevant, subnational) forest program goals. This clarification reinforces that REDD+ is

not a standalone effort but a complementary instrument within broader forest management and climate strategies. Strengthening the outcome wording to require demonstrated contributions (rather than mere consistency or absence of conflict) sets a higher and more meaningful bar for alignment.

The amendments therefore focus on making explicit that jurisdictions must:

- Have a clearly defined national REDD+ strategy or action plan that articulates how REDD+ contributes to national forest program objectives; and
- Provide evidence at the outcome level of the actual contributions of REDD+ activities to advancing those objectives (e.g. through policy documents, coordination mechanisms, and measurable outcomes that reinforce forest governance, conservation, or sustainable management).

This shift strengthens both the clarity and the practicality of the safeguard, ensuring that participants know what is expected, and that verifiers have tangible benchmarks to assess compliance.

Proposed Amendment Section 12.4.1 TREES 3.0- Theme 1.1

Structure and Process Indicator (amended):

Participants have **in place a national REDD+ strategy or action plan that is clearly defined and explicitly designed in alignment with, and to contribute to, the objectives of** ~~a clearly defined domestic legal framework, policies, or programs (or national REDD+ strategy or action plan)~~ as well as the necessary ~~procedures and resources for REDD+ activities to be designed~~ national and if applicable, subnational, forest policies/programs. **The Participant shall clearly articulate how the REDD+ actions support, complement, and, where relevant, strengthen existing forest sector objectives and frameworks.**

Outcome Indicator (amended):

Public institutions have designed and implemented REDD+ activities **in a manner that is fully consistent with and demonstrably contributes to,** ~~or complementary to~~ the objectives of the national and if applicable, subnational, forest policies/programs. **Evidence of contribution shall be provided, showing how REDD+ actions have advanced forest sector goals (e.g. strengthening forest governance (including inclusiveness), expanding incentive programs, reducing deforestation drivers, or enhancing biodiversity conservation).**

Proposed Amendment VVS for Section 12.4.1 TREES 3.0 Theme 1.1

Validation Scope

- The VVB shall confirm that the Participant has documented the relevant national (and, if applicable, subnational) forest program objectives and demonstrated how the REDD+ strategy or action plan aligns with and contributes to those objectives.
- Evidence may include national forest policy documents, development or climate plans, cross-walks showing how REDD+ activities map against policy goals, or legal analyses.
- The VVB shall also verify that any potential inconsistencies between REDD+ actions and existing forest sector policies have been identified and addressed in program design.

Verification Scope

- At each verification, the VVB shall evaluate whether REDD+ implementation remains consistent with and supportive of national (and subnational) forest program objectives.
- Evidence shall include monitoring reports, progress reports, or evaluation data demonstrating contributions of REDD+ activities to national policy targets (e.g. forest protection, reforestation, community forestry, biodiversity conservation).

- The VVB shall confirm whether REDD+ activities were updated as needed to remain aligned with evolving national forest objectives.
- The VVB shall also interview relevant government stakeholders (e.g. ministries, national REDD+ steering committees) to confirm institutional coordination and consistency.

Findings see Section 3.6.3.4 of the Safeguard Implementation Guidance for ART TREES 3.0 (Section 12) in Annex I (hereinafter “Safeguard Guidance”).

Major Non-Conformance:

- Failure to demonstrate alignment of the REDD+ strategy with national forest policy objectives;
- Absence of a legal or policy framework linking REDD+ to national forest programs; or
- Evidence that REDD+ activities directly contradict or undermine national forest policy goals.

Minor Non-Conformance:

- Alignment is generally evident but contains minor gaps, such as incomplete documentation of contributions or slight mismatches with one policy area that do not fundamentally undermine consistency. Examples include REDD+ activities implemented before an updated policy came into effect, where adjustments are planned and feasible.
- Minor findings must be addressed by the next verification through updated documentation or corrective actions.

Proposed Amendments to the TREES Templates Theme 1.1

1. TREES Registration Document (TRD) Template

Section 7 – Safeguards

Under the structure and process indicator (see amendments on box above) for Theme 1.1/A.1 please add:

The Participant shall:

- Identify and describe the objectives of national (and, if applicable, subnational) forest policies and programs;
- Explain how the national REDD+ strategy or action plan is explicitly designed in alignment with, and contributes to, these objectives;
- Provide a cross-walk or table, where possible, showing how each REDD+ action or measure supports specific forest policy goals (e.g. governance, reforestation, biodiversity conservation, incentive programs);
- Identify and explain any potential inconsistencies between REDD+ actions and national forest objectives, and describe how these have been or will be resolved.

Instructions to Participants: Please attach supporting evidence such as national policy documents, REDD+ strategy references, or legal instruments demonstrating this alignment.

For outcome indicator- see recommendations in section 12.3

2. TREES Monitoring Report (TMR) Template

Section 7- Safeguards

Under the outcome indicator for Theme 1.1/A.1 please add:

For the reporting period, the Participant shall:

- Describe how implemented REDD+ activities contributed to advancing the objectives of national (and, if applicable, subnational) forest programs;
- Provide evidence of contributions, such as monitoring data, progress reports, or outcomes (e.g. reduced illegal logging, expanded PES coverage, improved forest governance, enhanced biodiversity protection);
- Note any updates to national or subnational forest objectives during the reporting period and explain how REDD+ activities were adjusted to maintain consistency;
- Identify any challenges encountered in maintaining alignment and the corrective measures taken.

Instructions to Participants: Please provide quantitative and qualitative evidence of contributions, including references to monitoring systems, government reports, or stakeholder inputs. Where possible, provide tables linking REDD+ results to specific forest program objectives.

Theme 1.2 – Consistency with the objectives of relevant international conventions and Agreements

Rationale

Theme 1.2 ensures that REDD+ actions align with relevant international conventions and agreements, as required by Cancún Safeguard A. In practice, jurisdictions often struggle to demonstrate this alignment in a concrete and verifiable way – for example, by showing how the national REDD+ strategy supports the objectives, duties, and obligations under treaties such as the UNFCCC, CBD, CITES, UNCCD, and international human rights instruments (e.g., ILO 169, UNDRIP, ICCPR, and ICERD).

Clearer language is needed to require that REDD+ implementation actively supports and integrates these objectives (rather than simply avoiding inconsistency) and to require demonstrated contributions in the outcome (rather than mere consistency). This reinforces that REDD+ is a complementary instrument within broader development and climate strategies, not a standalone effort.

The amendments therefore focus on making explicit that jurisdictions must:

- Have a clearly defined national REDD+ strategy/action plan that articulates how REDD+ contributes to the objectives (and respects the obligations) of relevant ratified international conventions and agreements; and
- Provide evidence at the outcome level of the actual contributions of REDD+ activities to advancing those treaty objectives (e.g., via policy cross-walks, coordination mechanisms, and measurable outcomes) while upholding and not violating any international obligations.

By referencing “objectives, duties, and obligations,” the amendment captures both the spirit and the letter of international law and aligns with Cancún Safeguard A and international safeguard best practice, preventing REDD+ actions from undermining commitments under instruments such as the CBD, UNDRIP, or ICERD.

Proposed Amendment Section 12.4.1 TREES 3.0- Theme 1.2

Structure and Process Indicator (amended):

Participants have a domestic and, if applicable, subnational, legal framework, policies, or programs ~~(or including a clearly defined national REDD+ strategy or action plan)~~ as well as and the necessary procedures and resources to recognize **integrate** and promote the application of **the objectives, duties, and obligations of** ratified, relevant international conventions and agreements in the design and

implementation of REDD+ activities. **The Participant shall articulate how REDD+ actions contribute to these instruments' objectives and include procedures to screen for consistency and address any potential conflicts.**

Outcome Indicator (amended):

Public institutions have designed and implemented REDD+ activities **in a manner that is consistent with – and demonstrably contributes to** ~~–or complementary~~ the objectives of the identified, ratified, and relevant international conventions and agreements, **upholding and not violating any resulting international obligations. Evidence shall show contributions to treaty objectives (e.g., climate mitigation/adaptation, biodiversity conservation, protection of human rights) and no instance of conflict with or breach of such obligations.**

Proposed Amendment VVS for Section 12.4.1 TREES 3.0 Theme 1.2

Validation Scope

The VVB shall confirm that the Participant has:

1. Identified the set of relevant ratified international conventions and agreements (at a minimum covering environmental, human rights, and anti-corruption instruments, as applicable to REDD+) and listed them in the TREES Registration Document (TRD).
2. Integrated those instruments into the REDD+ legal/policy framework and/or REDD+ planning by:
 - Providing a national REDD+ strategy/action plan that articulates how REDD+ actions contribute to treaty objectives, duties, and obligations;
 - Presenting a cross-walk (or equivalent) mapping REDD+ actions/measures to specific treaty objectives (e.g., mitigation/adaptation under UNFCCC/Paris, biodiversity targets under CBD, species/habitat protection under CITES/Ramsar/CMS, rights protection under ILO 169/UNDRIP/ICCPR/ICERD, integrity under UNCAC); and
 - Describing screening procedures the Participant will use to identify and resolve any potential inconsistencies between planned REDD+ actions and treaty obligations prior to implementation.
3. Committed to apply the most protective standard when national law is less stringent than the country's international obligations, and to adjust REDD+ design accordingly.
4. Designated institutional responsibilities (e.g., treaty focal points, inter-ministerial committees) to oversee integration of treaty objectives into REDD+ planning.

Evidence may include: treaty inventory; REDD+ strategy sections referencing treaty objectives; legal analyses; cross-walk tables; minutes/terms of reference of inter-agency coordination bodies; corrective actions taken consistent with the rulings or recommendations of national, regional or international tribunals, decision-making bodies (i.e. UN Committee on Human Rights) and mandate holders.

Verification Scope

At each verification, the VVB shall assess whether REDD+ implementation remained consistent with and demonstrably contributed to the objectives of identified ratified conventions/agreements, and did not breach any obligations, by:

1. Reviewing evidence of contributions to treaty objectives (e.g., mitigation/adaptation outcomes, biodiversity conservation results, protection of endangered species/habitats, respecting, protecting, and promoting human rights, integrity/anti-corruption measures).
2. Confirming the Participant applied the higher (more protective) standard where national law lagged international obligations, and, where relevant, adjusted REDD+ activities to maintain alignment.
3. Checking updates: whether any new or amended international commitments arose during the period and how REDD+ implementation and safeguards were updated to integrate them.
4. Testing implementation of treaty-screening procedures (e.g., EIAs for CBD consistency; consultation/FPIC records for UNDRIP/ILO 169; species trade controls for CITES; anti-corruption/public disclosure for UNCAC; responses to UN human rights' treaty body decisions and Concluding Observations).
5. Interviewing relevant focal points (e.g., environment, foreign affairs, human rights institutions) and sampling stakeholders to corroborate no treaty conflicts occurred and that claimed contributions are credible.

Evidence may include: monitoring reports; biodiversity and species protection results; social safeguards/rights reports; publication of benefit-sharing and integrity disclosures; corrective actions taken to address any external findings (e.g., court/ombudsman/human rights commission recommendations).

Findings (See Safeguard Guidance (Annex I), Section 3.6.3.4)

Major Non-Conformance (any one triggers major):

- Failure to identify and integrate material ratified international obligations relevant to REDD+ (e.g., omission of CBD/UNDRIP/UNCAC where clearly applicable);
- Evidence that a REDD+ action breached a ratified treaty obligation (e.g., harm to protected species/habitats; failure to respect FPIC/rights under ILO 169/UNDRIP; integrity violations inconsistent with UNCAC);
- No framework or procedures to screen REDD+ actions against treaty requirements, or a documented treaty conflict left unaddressed;
- Refusal/failure to take corrective measures to address the findings of courts/ombudsman, human rights committee recommendations, etc.
- Refusal/failure to apply the most protective standard where national law is weaker than international obligations, resulting in rights or environmental risk.

Minor Non-Conformance (all must be true):

- The program is generally aligned and no breaches occurred;
- Documentation gaps or limited cross-walk detail (e.g., incomplete mapping of all actions to treaty objectives); or
- Delayed integration of a newly ratified obligation that did not affect implementation during the period (including, caused no harm) and is being corrected through an approved plan.

Corrective Action for Minor: The Participant shall provide the missing documentation/cross-walk elements or complete integration of new obligations by the next verification; repeated or uncorrected minor issues escalate to major.

Optional VVS Annex – Auditor Checklist (Theme 1.2)

- **Treaty Inventory:** UNFCCC/Paris, CBD/Nagoya, CITES, Ramsar/CMS, UNCCD/ITTA, ILO 169/UNDRIP, ICCPR/ICERD/CEDAW, UNCAC (plus regional instruments).
- **Strategy Cross-Walk:** REDD+ actions → treaty objectives/obligations → expected contributions → evidence sources.

- **Screening SOPs:** EIA/SESA, rights/FPIC screening, species/habitat screening, integrity/anti-corruption disclosure.
- **Implementation Evidence:** Monitoring data; rights compliance; species/habitat protection; publication of integrity and benefit-sharing information; corrective actions taken.
- **Higher Standard Test:** Where national law < international obligation, confirm program applied the higher standard and adapted activities.

Proposed Amendments to the TREES Templates Theme 1.2

1. TREES Registration Document (TRD) Template

Section 7 – Safeguards

Under the structure and process indicator (see amendments on box above) for Theme 1.2/A.2 please add:

The Participant shall:

- **List all relevant international conventions and agreements ratified by the country that are pertinent to REDD+ (covering at least environmental, human rights, and anti-corruption instruments);**
- **Explain how the national REDD+ strategy or action plan has been explicitly designed to align with and contribute to the objectives, duties, and obligations of these conventions and agreements;**
- **Provide a cross-walk or summary table mapping REDD+ actions or measures to specific treaty objectives (e.g., mitigation/adaptation under UNFCCC/Paris, biodiversity under CBD/CITES, rights protection under ILO 169/UNDRIP, integrity under UNCAC);**
- **Describe the institutional or procedural arrangements in place to ensure that REDD+ implementation remains consistent with treaty obligations (e.g., inter-ministerial committees, screening processes, safeguard frameworks); and**
- **Identify and explain any potential inconsistencies with ratified conventions, including where the supervisory bodies of said conventions have advised the Participant of such inconsistencies, and describe how these are to be addressed.**

Instructions to Participants: Please attach supporting documents such as treaty ratification lists, legal or policy frameworks, cross-walk tables, and safeguard assessments. Where relevant, describe how national law and international obligations are reconciled, and confirm that the higher (more protective) standard will be applied in implementation.

For outcome indicator- see recommendations in section 12.3

2. TREES Monitoring Report (TMR) Template

Section 7- Safeguards

Under the outcome indicator (see amendments on boxes above) for Theme 1.2/A.2 please add:

For the reporting period, the Participant shall:

- **Report on how REDD+ activities implemented contributed to advancing the objectives of relevant international conventions and agreements ratified by the country;**
- **Provide evidence of contributions, such as monitoring results, biodiversity or habitat protection outcomes, rights-related safeguards, integrity/anti-corruption measures, or other results directly tied to treaty commitments;**

- **Confirm that no REDD+ activities conflicted with or breached treaty obligations;**
- **Describe any new international conventions or agreements ratified during the reporting period and how they have been integrated into REDD+ design and implementation; and**
- **Explain any adjustments made to REDD+ actions to maintain consistency with evolving international obligations.**

Instructions to Participants: Please provide quantitative and qualitative evidence of contributions, using tables or cross-walks where possible to link REDD+ actions to treaty objectives. Supporting documents may include monitoring data, safeguard information reports, stakeholder feedback, or government reports to treaty bodies.

Theme 2.1 – Respect, protect, and fulfill the right of access to information

Rationale

Theme 2.1 operationalizes Cancún Safeguard B on **transparent and effective governance**, by requiring jurisdictions to ensure stakeholder access to information on REDD+ activities, benefit distribution, and safeguards. In practice, many countries have **freedom of information laws** or establish a **Safeguard Information System (SIS)**, but these mechanisms are often weak in practice: information may not be proactively disseminated, may be delayed, or may not be accessible in appropriate formats and languages. As a result, stakeholders – particularly Indigenous Peoples, local communities, and civil society – may not be aware of or able to use relevant information effectively.

To address this gap, the safeguard indicators should be strengthened to require:

- **Timely, proactive, and accessible disclosure** of REDD+ information, rather than reliance on ad hoc or reactive provision;
- Availability of key documents – such as benefit-sharing plans, safeguard reports, and monitoring results – in **appropriate languages and non-technical formats**;
- Confirmation that stakeholders have actually **used and exercised their right to information**, not just that the information exists on paper.

These changes align with international transparency norms, such as the **Rio Declaration Principle 10**, and **UNCAC Article 13**, all of which emphasize timely, non-discriminatory, and accessible public information as a cornerstone of good governance. They also respond to calls from civil society and carbon buyers for greater openness around REDD+ benefit-sharing, agreements transferring/affirming ERR rights, and safeguard performance.

In sum, the amendments ensure that the **right of access to information is effectively realized**, building trust, accountability, and stakeholder engagement in REDD+ programs. The timely access to information also ensures that the public can comment at a time to influence pending decisions and approvals *before* they are issued.

Proposed Amendment Section 12.4.1 TREES 3.0- Theme 2.1

Structure and Process Indicator (amended):

Participants have in place a legal framework, policies and/or programs, ~~as well as~~ **and** the necessary procedures and resources ~~for providing access to ensure the~~ **timely, proactive, accessible, and non-discriminatory provision of** information related to REDD+ activities, REDD+ benefit distribution, and how safeguards have been implemented ~~addressed and respected~~. **This includes measures to make key documents (e.g. REDD+ strategies, benefit-sharing plans, agreements to transfer ERR rights, safeguard reports, and**

monitoring results) publicly available in appropriate languages, culturally accessible formats, and through multiple dissemination channels.

Outcome Indicator (amended):

Public institutions have provided **timely, accessible, and non-discriminatory** access to information, and ~~the~~ **public stakeholders have been aware of and exercised their right to seek and receive official information on REDD+ activities, REDD+ benefit distribution, agreements to transfer ERR rights, and how safeguards have been implemented.** ~~addressed and respected.~~ Evidence demonstrates that information was **proactively disseminated and actually accessed and used by stakeholders.**

Proposed Amendment VVS for Section 12.4.1 TREES 3.0 Theme 2.1

Validation Scope

The VVB shall confirm that the Participant has:

1. Identified the legal and institutional framework for public access to REDD+ information (e.g., freedom of information laws, Safeguard Information System, or REDD+-specific transparency provisions).
2. Committed to timely, proactive, accessible, and non-discriminatory disclosure of information on REDD+ activities, benefit distribution, agreements to transfer ERR rights, and safeguards.
3. Outlined dissemination mechanisms, including how information will be:
 - Made publicly available in appropriate languages and culturally accessible formats;
 - Proactively published (e.g., online portals, community meetings, media channels);
 - Shared in a way that is usable by women, Indigenous Peoples, local communities, and vulnerable groups.
4. Listed key documents (e.g., REDD+ strategy, benefit-sharing plan, agreements to transfer ERR rights, monitoring reports, safeguard information summaries) that will be disclosed.

Evidence may include:

- Laws or policies mandating disclosure;
- SIS design documents or websites;
- Communications strategies or outreach plans;
- Draft/public versions of benefit-sharing plans, agreements to transfer ERR right, or monitoring reports.

Verification Scope

The VVB shall verify, during each monitoring period, that:

1. Information was disclosed proactively and in a timely manner, not only on request.
2. Key documents (e.g., REDD+ strategy, benefit-sharing plan, agreements on ERR rights, monitoring reports, safeguard reports) were made publicly available in accessible formats and languages.
3. Stakeholders were aware of and exercised their right to information, demonstrated by:
 - Records of stakeholder access (e.g., website downloads, distribution lists, community meeting minutes);
 - Interviews with Indigenous Peoples, local communities, women's groups, and NGOs confirming awareness and access;

- Evidence of stakeholder use of safeguard information (e.g., referencing it in consultations, raising feedback, submitting comments).
- 4. No systematic barriers were imposed on vulnerable groups' access (e.g., paywalls, complex procedures, language exclusion).
- 5. Public feedback loops were in place – e.g., mechanisms to provide comments on disclosed documents – and any feedback was acknowledged or addressed and calendarized to ensure meaningful comment before key decisions and approvals were made.

Evidence may include: monitoring reports; biodiversity and species protection results; social safeguards/rights reports; publication of benefit-sharing and integrity disclosures; corrective actions taken to address any external findings (e.g., court/ombudsman/human rights commission recommendations).

Findings (See Safeguard Guidance (Annex I), Section 3.6.3.4)

Major Non-Conformance:

- No functioning mechanism for public access to REDD+ information exists;
- Key REDD+ documents (e.g., benefit-sharing plan, agreements to transfer of ERR rights, monitoring report) were withheld from the public;
- Information was not disclosed in a timely manner, preventing stakeholders from exercising rights to participate or monitor benefit-sharing;
- Systematic exclusion of certain groups (e.g., Indigenous Peoples, women, remote communities) from access to REDD+ information.

Minor Non-Conformance:

- Mechanisms exist and most key documents were disclosed, but with documentation gaps (e.g., late publication, incomplete translations, limited accessibility in one period);
- Minor delays in dissemination that did not materially impair stakeholder access or rights;
- Feedback loops exist but are only partially functional (e.g., comments received but not fully tracked).
- These issues must be corrected before the next verification.

Proposed Amendments to the TREES Templates Theme 2.1

1. TREES Registration Document (TRD) Template

Section 7 – Safeguards

Under the structure and process indicator (see amendments on box above) for Theme 2.1 please add:

The Participant shall:

- Describe the legal and institutional framework governing public access to information, including any freedom of information laws, Safeguard Information System (SIS), or REDD+-specific mechanisms;
- Explain how REDD+ information (e.g., REDD+ strategy, benefit-sharing plan, agreements on the transfer of ERR rights, monitoring reports, safeguard information summaries) will be proactively disclosed in a timely, accessible, and non-discriminatory manner;
- List the dissemination methods (e.g., SIS website, community meetings, radio broadcasts, hard copy distributions) and how these ensure access for Indigenous Peoples, local communities, women, and vulnerable groups;

- Identify the formats and languages in which information will be made available to ensure usability;
- Describe feedback mechanisms (e.g., comment periods, online forms, community feedback sessions) to allow stakeholders to provide input on disclosed information.

Instructions to Participants: Attach supporting evidence such as SIS portal design, communication strategies, or sample disclosure materials. Where applicable, specify institutional roles and budgets allocated for dissemination and translation.

For outcome indicator- see recommendations in section 12.3

2. TREES Monitoring Report (TMR) Template

Section 7- Safeguards

Under the outcome indicator (see amendments on boxes above) for Theme 2.1 please add:

For the reporting period, the Participant shall:

- Report which REDD+ documents were publicly disclosed (e.g., monitoring report, benefit-sharing plan, safeguard summary), when, and through which channels;
- Provide evidence that information was disseminated in a timely, accessible, and non-discriminatory manner (e.g., SIS links, distribution lists, community meeting records, translated summaries);
- Confirm how stakeholders, including Indigenous Peoples, local communities, women, and vulnerable groups, were made aware of and accessed the information;
- Summarize any feedback received from stakeholders on disclosed information and describe how it was addressed;
- Explain any challenges in providing timely, accessible disclosure and the measures taken to address them.

Instructions to Participants: Please provide both qualitative and quantitative evidence (e.g., number of downloads, attendance at community meetings, copies of translated materials, evidence of distributions of full copies (not just excerpts of draft agreements to parties to affected stakeholders)). Attach stakeholder feedback or comment summaries where available.

Theme 2.2 – Promote transparency and prevent corruption, including through the promotion of anti-corruption measures

Rationale

Theme 2.2 operationalizes Cancún Safeguard B by requiring transparent and effective governance, particularly to promote transparency and prevent corruption. In TREES, this theme ties closely to Section 3.4 on benefit sharing arrangements, which already requires Participants to describe how proceeds are allocated to stakeholders.

Field experience shows that while benefit-sharing plans can look strong on paper, the integrity of implementation depends on additional safeguards:

- Public disclosure of REDD+ revenues and benefit allocations;
- Independent oversight (e.g. audits, watchdog committees, or civil society monitoring); and

- Mechanisms to detect and address irregularities (fraud, diversion, elite capture).

The structural indicator should therefore be clarified to require dedicated transparency and anti-corruption systems specifically for REDD+ finance, complementing Section 3.4.2. The outcome indicator should reflect the full anti-corruption cycle: prevention, detection, and response, ensuring that if misuse of REDD+ funds occurs, corrective or legal action is taken.

These refinements align with the UN Convention Against Corruption (UNCAC) and safeguard best practice (e.g. FCPF Carbon Fund requirements for transparency and audits). They also make explicit that compliance with Safeguard B is inseparable from demonstrating integrity in benefit-sharing (Section 3.4.2), as both are assessed together under TREES safeguards.

Proposed Amendment Section 12.4.1 TREES 3.0- Theme 2.2

Structure and Process Indicator (amended):

Participants have in place a legal framework, policies and/or programs, ~~and as well as~~ the necessary procedures and resources to prevent corruption, promote anti-corruption measures, and ~~promote~~ **ensure** transparency as applicable in REDD+ activities and **in the management and** the distribution of REDD+ benefits. ~~These reflect the principles of rule of law, proper management of public affairs and public property, and integrity. These measures shall include: public financial disclosure of REDD+ revenues and benefit allocations, independent oversight or audits of REDD+ funds, and mechanisms to detect, investigate, and sanction misuse. These safeguards shall complement the benefit-sharing arrangements required under Section 3.4 and reflect the principles of rule of law, integrity, transparency, and accountability, consistent with relevant international conventions (e.g. UNCAC).~~

Outcome Indicator (amended):

Public institutions have carried out REDD+ activities and the distribution of REDD+ benefits in a transparent and accountable manner, **preventing corruption and effectively addressing any instances of fraud, mismanagement, or misuse of funds. Evidence shall include public disclosure of benefit distribution, audit reports, and corrective or legal actions taken where irregularities were identified, consistent with the benefit-sharing requirements under Section 3.4 and Safeguards B, C, D, and E.**

Proposed Amendment VVS for Section 12.4.1 TREES 3.0 Theme 2.2

Validation Scope

The VVB shall confirm that the Participant has:

1. **Identified the legal and institutional framework for anti-corruption and transparency, and demonstrated how it applies specifically to REDD+ activities and benefit-sharing under Section 3.4.2.**
2. **Documented procedures for ensuring transparency in REDD+ finance, including:**
 - **Public disclosure of REDD+ revenues and benefit allocations;**
 - **Independent oversight or audits of REDD+ funds; and**
 - **Mechanisms to detect and address irregularities (e.g., fraud, mismanagement, elite capture).**
3. **Clarified institutional roles for oversight of REDD+ benefit distribution, including how civil society, Indigenous peoples and local communities, or other stakeholders are engaged in monitoring.**

4. Provided a benefit-sharing plan (Section 3.4.2) that explicitly includes transparency and anti-corruption safeguards in its principles, criteria, and implementation arrangements.

Evidence may include: legal and policy texts; financial management manuals; descriptions of planned audits; provisions for disclosure; oversight body terms of reference; benefit-sharing plan documentation.

Verification Scope

The VVB shall verify, during each monitoring period, that:

1. Public disclosure of REDD+ revenues and benefit distribution has occurred, in appropriate formats and accessible channels.
2. Independent oversight mechanisms (audits, multi-stakeholder oversight committees, watchdog groups) were implemented, and audit findings (if any) were made public.
3. No evidence of corruption or mismanagement was identified; or, if issues occurred, that they were investigated and addressed through corrective or legal action.
4. Stakeholder interviews (e.g., IPs & LCs, NGOs, local beneficiaries) corroborate that benefit-sharing was carried out transparently and without elite capture.
5. Benefit-sharing reporting under Section 3.4.2 aligns with safeguard reporting under Theme 2.2, ensuring consistency across the TRD/TMR and safeguard sections.

Evidence may include: audit reports; public financial disclosure reports; monitoring reports; records of benefit allocations; records of corrective actions or sanctions taken; interviews with beneficiaries confirming receipt of benefits.

Findings (See Safeguard Guidance (Annex I), Section 3.6.3.4)

Major Non-Conformance:

- No disclosure of REDD+ revenues or benefit allocations;
- No audit or oversight mechanism in place;
- Credible evidence of corruption, diversion, or elite capture in REDD+ benefit-sharing that was not addressed;
- REDD+ funds or benefits distributed in a non-transparent, discriminatory, or unaccountable manner;
- Failure to implement the transparency and integrity provisions in the benefit-sharing plan (Section 3.4.2).

Minor Non-Conformance:

- Disclosure occurred but with delays or incomplete data (e.g., partial publication of expenditures, lack of timely translation);
- Audits or oversight conducted but with delays in publication of results;
- Small irregularities detected but corrective actions were promptly taken;
- Minor inconsistencies between safeguard reporting and benefit-sharing reporting under Section 3.4.2, provided they do not undermine overall transparency.

Corrective Action for Minor: The Participant must close documentation gaps, ensure timely disclosure, and align reporting by the next verification. Repeated or unaddressed minor issues escalate to major.

Proposed Amendments to the TREES Templates Theme 2.2

1. TREES Registration Document (TRD) Template

Section 7 – Safeguards

Under the structure and process indicator (see amendments on box above) for Theme 2.2 please add:

The Participant shall:

- Describe the legal and institutional framework for transparency and anti-corruption, and how it applies to REDD+ benefit-sharing arrangements (Section 3.4.2);
- Explain procedures for preventing and addressing corruption, including requirements for:
 - Public disclosure of REDD+ revenues and benefit allocations;
 - Independent oversight and/or audits of REDD+ funds;
- Mechanisms for detecting, investigating, and sanctioning misuse or diversion of funds;
- Identify institutional roles and responsibilities for financial oversight (e.g., ministries, audit bodies, multi-stakeholder committees);
- Describe how stakeholders (e.g., Indigenous Peoples, local communities, civil society) are engaged in monitoring transparency and accountability of REDD+ finance;
- Attach or reference the Benefit-Sharing Plan (Section 3.4.2), ensuring it includes clear provisions for transparency, accountability, and anti-corruption safeguards.

Instructions to Participants: Attach supporting evidence such as laws, policies, financial procedures, audit mandates, disclosure mechanisms, or oversight body terms of reference. Clearly identify how benefit-sharing reporting will be integrated with safeguard reporting.

For outcome indicator- see recommendations in section 12.3

2. TREES Monitoring Report (TMR) Template

Section 7- Safeguards

Under the outcome indicator (see amendments on boxes above) for Theme 2.2 please add:

For the reporting period, the Participant shall:

- Report all REDD+ revenues received and benefits distributed, with details on amounts, recipients, and timing;
- Provide evidence of disclosure of this information (e.g., SIS links, public reports, community dissemination);
- Attach or summarize audit findings or oversight committee reports relevant to REDD+ finance and benefit-sharing;
- Describe any irregularities (e.g., fraud, mismanagement, elite capture) detected during the period and explain corrective or legal actions taken;
- Confirm stakeholder participation in oversight or monitoring (e.g., NGO observers, IPLC representatives) and describe their feedback;
- Explain any challenges encountered in ensuring financial transparency and integrity, and the measures taken to strengthen systems.

Instructions to Participants: Please provide both qualitative and quantitative evidence (e.g., financial statements, audit reports, disclosure websites, meeting records). Summarize findings from independent oversight where applicable. Ensure reporting is consistent with Section 3.4.2 (Benefit-Sharing Arrangements).

Theme 2.3 – Respect, protect, and fulfill land tenure rights.

Rationale

Theme 2.3 is central to Cancún Safeguard B and C, requiring that REDD+ implementation respect, protect, and fulfill land and resource tenure rights. The current wording focuses on recognition and mapping of tenure rights and prohibits involuntary relocation without FPIC. While essential, this formulation does not fully address the risks observed in practice.

Field experience and evolving international standards highlight the need to go further:

- **No REDD+ action should undermine or infringe tenure rights (whether title yet, or not).** Securing tenure must be an ongoing guarantee, not a one-time administrative or legislative step (i.e. recognized tenure rights that face illegal occupancies or unfettered incursions into ancestral lands is not conformance with Cancun Safeguards).
- **FPIC must apply broadly** – not only to cases of physical relocation, but to *any REDD+ activity* that may affect Indigenous Peoples’ or local communities’ rights to land, territories, or resources. Narrow interpretations of FPIC (as limited to resettlement) are inconsistent with established jurisprudence and international standards.
- **Alignment with international standards** such as UN human rights treaties, the **Voluntary Guidelines on the Responsible Governance of Tenure (VGGT)**, **UNDRIP** (Articles 10, 25, 26), and **IFC Performance Standard 5**, reinforces that REDD+ must strengthen tenure security and never erode rights to “own, use, develop, and control lands, territories, and resources” (whether recognized by the issuance of title or not) (“tenure rights”).

The amendments therefore:

- Refine the **structure/process indicator** to explicitly require procedures for securing tenure, addressing overlapping claims, and ensuring FPIC applies to any rights-affecting activity;
- Strengthen the **outcome indicator** to make clear that stakeholders’ tenure rights are retained and respected, and that FPIC is a condition not only for relocation but for any measure that may affect rights;
- Insert a clarifying sentence that closes the misconception that FPIC is only required in cases of resettlement, consistent with international law and safeguard best practice.

This approach ensures REDD+ programs, including carbon crediting initiatives, cannot displace, dispossess, or compromise tenure rights – and instead are expected to contribute positively to tenure security and trust with rightsholders.

Proposed Amendment Section 12.4.1 TREES 3.0- Theme 2.3

Structure and Process Indicator (amended):

Participants have in place a legal framework, policies, or programs, ~~as well as the~~ **together with** the necessary procedures and resources, for the recognition, inventorying, mapping, and ongoing security of customary and statutory land and resource tenure rights relevant to REDD+ activities. **These procedures shall include mechanisms for resolving overlapping or contested claims and for ensuring that any REDD+ activity that may affect stakeholders’ rights to lands, resources and territories is undertaken only with their Free, Prior, and Informed Consent (FPIC), consistent with applicable international standards (e.g. ICCPR, ICERD, UNDRIP, VGGT).**

Outcome Indicator (amended):

Public institutions have recognized, inventoried, mapped, and secured customary and statutory land and resource tenure rights relevant to ~~the implementation of~~ REDD+ activities and ensured that stakeholders **retained rights of ownership**, access to, use of, and control **over their lands and resources, and territories throughout the implementation of REDD+ actions implementation.** No REDD+ activities undermined or infringed upon those rights without prior good-faith consultations and, where required, FPIC. Title and untitled lands, resources, and territories issued by a national or subnational authority shall not be dispositive of a tenure right.

REDD+ activities have not caused any involuntary relocation without the FPIC of Indigenous Peoples, Local Communities, Afro-descendant Peoples, or equivalent stakeholders. **The same standard of FPIC shall apply to any other REDD+ activities that may affect these stakeholders' rights, lands, territories, or resources, regardless of whether physical relocation is involved.**

Proposed Amendment VVS for Section 12.4.1 TREES 3.0 Theme 2.3

Validation Scope

The VVB shall confirm that the Participant has:

1. Identified and described all statutory and customary land and resource tenure systems within the REDD+ accounting area, including Indigenous Peoples, Local Communities, Afro-descendant Peoples, and other rightsholders.
2. Provided mapping and inventory evidence of tenure arrangements, including community lands, indigenous territories, private lands, and areas with overlapping claims.
3. Documented procedures for:
 - Recognition and ongoing security of tenure rights (titles, demarcations, or formal recognition of customary rights);
 - Resolution of overlapping or contested claims prior to credit issuance; and
 - Application of FPIC to any REDD+ activity that may affect rights to lands, resources and territories, not limited to relocation, and;
 - Identified where credits cannot be issued due to residual unresolved claims.
4. Referenced international standards (e.g., VGGT, UNDRIP, others) in describing how rights protections are integrated into the REDD+ strategy.
5. Confirmed governance roles of relevant institutions responsible for tenure recognition and oversight.

Evidence may include: land tenure assessments, participatory maps, legal frameworks, conflict resolution procedures, FPIC protocols, and safeguard information system records.

Verification Scope

The VVB shall verify, during each monitoring period, that:

1. Tenure rights were maintained and respected throughout REDD+ implementation. Stakeholders confirm continued access to and control over their lands, resources, and territories.
2. No REDD+ activity undermined or infringed tenure rights. If land/resource access was restricted or altered, the existence of FPIC documentation is confirmed and reviewed (e.g., signed agreements, community resolutions, audio/visual records, third-party attestations).

3. No involuntary relocation occurred without FPIC.
4. Any contested claims were resolved in accordance with Applicable Law before credits were issued.
5. Grievance records (Theme 2.4) are reviewed to identify any tenure-related complaints. The VVB checks how these were addressed and whether remedies were effective.
6. Stakeholder interviews (with Indigenous Peoples, local communities, women, and vulnerable groups) and/or documents they submit corroborate tenure security and confirm whether FPIC was respected.

Evidence may include: tenure maps, updated land registry records, agreements with communities, FPIC records, grievance logs (including those filed domestically or to international complaint mechanisms), monitoring reports, and stakeholder testimonies.

Findings (See Safeguard Guidance (Annex I), Section 3.6.3.4)

Major Non-Conformance:

- Failure to identify or recognize significant tenure rights-holders in the REDD+ area;
- Evidence that REDD+ activities caused dispossession, loss of access, limitations on resource use, or infringement of tenure rights without FPIC;
- Involuntary relocation of communities without FPIC;
- Failure to resolve known land disputes or overlapping claims prior to credit issuance (unless such issuances are discontinued until claims are resolved);
- Evidence of FPIC being bypassed, coerced, or procedurally invalid.

Minor Non-Conformance:

- Incomplete tenure documentation (e.g., minor mapping gaps) where tenure rights are nevertheless respected in practice and there is no evidence of harm due to REDD+ implementation;
- FPIC was obtained but some documentation is incomplete (e.g., missing minutes, limited translation records) without evidence of harm;
- Small, low-impact disputes or claims remain pending, will not harm stakeholders with REDD+ implementation, and they are being addressed transparently through recognized mechanisms.

Corrective Action for Minor: The Participant must close documentation gaps, finalize conflict resolution, or strengthen FPIC record-keeping before the next verification. Repeated or uncorrected minor issues escalate to major.

Proposed Amendments to the TREES Templates Theme 2.3

1. TREES Registration Document (TRD) Template

Section 7 – Safeguards

Under the structure and process indicator (see amendments on box above) for Theme 2.3 please add:

The Participant shall:

- Describe the statutory and customary tenure systems present in the REDD+ accounting area, including Indigenous Peoples, Local Communities, Afro-descendant Peoples, and other rights-holders;

- Provide evidence of recognition and mapping of land and resource tenure rights (e.g., land registries, participatory maps, customary land records, or official designations of indigenous territories);
- Identify any overlapping or contested claims and describe how they will be addressed or resolved prior to credit issuance;
- Explain the procedures for ensuring tenure rights are maintained throughout REDD+ implementation, including institutional roles and resources dedicated to tenure security;
- Describe the FPIC process to be followed for any REDD+ activity that may affect rights to lands, territories, or resources – clarifying how FPIC will be sought, documented, and verified in culturally appropriate ways;
- Attach supporting documentation (e.g., tenure assessments, FPIC protocols, national legal provisions, international commitments referenced).

Instructions to Participants: Please provide a comprehensive tenure assessment report (or equivalent) and include maps or tables summarizing tenure arrangements. Clearly reference how FPIC processes will be triggered and carried out for activities that may affect tenure rights.

For outcome indicator- see recommendations in section 12.3

2. TREES Monitoring Report (TMR) Template

Section 7- Safeguards

Under the outcome indicator (see amendments on boxes above) for Theme 2.3 please add:

For the reporting period, the Participant shall:

- Report on the status of statutory and customary land and resource tenure rights in the REDD+ area, confirming that tenure security has been maintained;
- Provide updates on recognition, inventorying, mapping, or formalization of tenure rights carried out during the period;
- Confirm that no REDD+ activity undermined or infringed on tenure rights;
- Document FPIC processes undertaken for any REDD+ activity that affected rights to lands, resources or territories, including evidence such as meeting records, signed agreements evidencing disclosure and consent to limitations on use, control, access or ownership, community resolutions, or independent attestations;
- Report on disputes or claims raised during the period and describe how they were addressed or resolved (link to grievance mechanism reporting under Theme 2.4);
- Describe stakeholder perspectives, summarizing how Indigenous Peoples, Local Communities, and other rightsholders view the status of their land/resource/territory rights under the REDD+ program.

Instructions to Participants: Attach supporting evidence (maps, tenure records, FPIC documentation, grievance logs, stakeholder feedback). Where applicable, provide disaggregated information by group (e.g., Indigenous Peoples, smallholders, women) to demonstrate inclusivity and equity.

Theme 2.4 – Respect, protect, and fulfil access to justice

Rationale

Theme 2.4 addresses **access to justice** under Cancún Safeguard B by requiring jurisdictions to provide stakeholders with effective, affordable, and non-discriminatory mechanisms for grievance redress. The current indicators focus on ensuring that relevant judicial or administrative dispute resolution exists and that remedies are provided when rights are violated.

Experience from the field shows that relying solely on existing judicial and administrative systems is inadequate. Courts and administrative channels are often too slow, costly, distant, or inaccessible for Indigenous Peoples, local communities, women, and other vulnerable groups. As a result, many REDD+ programs have operated without an adequate grievance mechanism that stakeholders could realistically use, leaving safeguards untested and grievances unresolved. If TREES is to stand on the shoulders of REDD+, it needs to reconcile this experience with its requirement of access to justice.

To uphold international standards, TREES must require a grievance redress mechanism (GRM) that has clear mandate, resources, and accountability within the REDD+ agency responsible for the REDD+ Implementation Plan (Section 3.3).

This does not mean creating a new national institution. Rather, it means ensuring that the REDD+ agency (or designated authority) has a formalized program-specific mechanism capable of:

- Receiving, assessing, and resolving grievances tied to activities under the REDD+ Implementation Plan;
- Providing multiple, culturally appropriate entry points accessible to Indigenous Peoples, local communities, women, and vulnerable groups;
- Delivering prompt and effective remedies, not just acknowledging complaints; and
- Meeting the effectiveness criteria of the UN Guiding Principles on Business and Human Rights (UNGPs): legitimacy, accessibility, predictability, equitability, transparency, rights-compatibility, and continuous learning.

This approach aligns with best practice. Under the **FCPF Carbon Fund**, all Emission Reduction Programs were required to establish program-specific GRMs that were transparent, accessible, and consistent with international standards. These mechanisms proved essential in building trust, enabling accountability, and preventing conflict. TREES 3.0 should emulate this best practice by requiring REDD+ program-specific grievance redress mechanisms as part of safeguard compliance.

Furthermore, adding “promptly” to the outcome indicator makes clear that remedies must not only exist but must be **delivered in a timely and effective manner**, ensuring that grievances are resolved before they escalate or undermine program integrity.

These refinements strengthen TREES 3.0 by ensuring REDD+ grievance mechanisms are not simply procedural, but **functional, accessible, and trusted** by stakeholders, providing a meaningful safeguard against rights violations and governance failures.

Proposed Amendment Section 12.4.1 TREES 3.0- Theme 2.4

Structure and Process Indicator (amended):

Participants have in place a legal framework, policies, or programs and the necessary procedures and resources for guaranteeing non-discriminatory, ~~and non-cost prohibitive,~~ **and accessible** dispute resolution mechanisms at all relevant levels for stakeholders involved in the implementation of, or with a recognized legal interest in, the REDD+ activities, ~~including judicial and/or administrative procedures for legal redress, which, among other things, provide access for Indigenous Peoples, Local Communities, Afro-descendant Peoples or equivalent stakeholders.~~ **In addition to these judicial and/or administrative dispute**

resolution mechanisms, Participants shall establish a REDD+ program-specific grievance redress mechanism (GRM) mandated within the REDD+ agency responsible for the REDD+ Implementation Plan (Section 3.3). The mechanism shall:

- Be designed to receive, assess, and resolve grievances directly related to the REDD+ Implementation Plan and its activities;
- Provide multiple, culturally appropriate entry points accessible to Indigenous Peoples, local communities, women, and vulnerable groups, in relevant local languages;
- Operate according to published rules of procedure that specify responsibilities, timelines, and avenues for appeal;
- Ensure remedies are legitimate, accessible, predictable, equitable, transparent, rights-compatible, and a source of continuous learning, consistent with the effectiveness criteria set out in the UN Guiding Principles on Business and Human Rights (UNGPs).

Outcome Indicator (amended):

Public institutions have resolved disputes and competing claims arising from the REDD+ Implementation Plan and provided effective recourse and remedies through non-cost prohibitive, ~~and~~ non-discriminatory, **and accessible** mechanisms ~~when~~ **whenever** there was a violation of rights, grievance, dispute, or claim related to the implementation of REDD+ activities. **Such grievances were resolved promptly and fairly, with remedies that affected stakeholders recognize as legitimate and effective.**

Proposed Amendment VVS for Section 12.4.1 TREES 3.0 Theme 2.4

Validation Scope

The VVB shall confirm that the Participant has:

1. Identified and described the legal and institutional framework for dispute resolution relevant to REDD+ (e.g., judicial, administrative, customary, or ombudsperson mechanisms).
2. Established or designated a dedicated REDD+ grievance redress mechanism (GRM) that is accessible, non-discriminatory, and free of charge, in addition to existing judicial and administrative options.
3. Outlined the procedures of the REDD+ GRM, including:
 - Intake channels (written, oral, hotline, digital, community focal points);
 - Accessibility for Indigenous Peoples, Local Communities, Afro-descendant Peoples, women, and vulnerable groups (languages, cultural appropriateness);
 - Timelines and processes for acknowledgement, investigation, and resolution;
 - Escalation pathways to higher authorities if not resolved.
4. Designated responsible institutions (e.g., grievance committees, REDD+ secretariat units, or independent oversight bodies) to operate the GRM with sufficient resources and authority.
5. Linked the GRM to the Safeguard Information System (SIS) and benefit sharing reporting processes under Section 3.4.2, ensuring transparency of grievance data.

Evidence may include: legal frameworks; GRM policy documents; SOPs/manuals for case handling; staffing and budget allocations; communication/outreach plans to inform stakeholders of the mechanism; internal/external assessments of the GRM's conformance with best practice and international duties and obligations related to access to justice and the provision of remedies to address harms.

Verification Scope

The VVB shall verify, during each monitoring period, that:

1. The REDD+ GRM is functional and accessible – demonstrated by outreach records (e.g., awareness-raising with communities), multiple intake channels, and grievance logs.
2. Disputes, grievances, and claims were resolved promptly and fairly through the REDD+ GRM or other accessible channels.
3. Remedies provided were legitimate and effective in the eyes of affected stakeholders (confirmed through interviews with complainants or representatives).
4. Records of grievances (logs, databases, summaries) exist and are consistent with reported outcomes, showing timeliness of responses and resolutions.
5. Transparency of outcomes was ensured – at minimum, anonymized grievance statistics and summaries were disclosed through the SIS or equivalent channels.
6. Linkages with judicial/administrative systems are clear, and any escalated cases were appropriately handled.
7. No evidence exists of retaliation against complainants.

Evidence may include: grievance registers; case resolution files; complainant satisfaction surveys; stakeholder interviews; SIS updates; independent observer or civil society monitoring reports.

Findings (See Safeguard Guidance (Annex I), Section 3.6.3.4)

Major Non-Conformance:

- No functioning grievance redress mechanism for REDD+ exists;
- Mechanism exists but is inaccessible (e.g., no outreach, only in capital city, not free of charge);
- Documented grievances or rights violations remain unresolved or were dismissed without due process;
- Remedies provided were not legitimate (e.g., coercion, no corrective action, denial of valid claims);
- Evidence of systematic retaliation or intimidation against complainants.

Minor Non-Conformance:

- GRM exists and is functional, but documentation is incomplete (e.g., missing details in grievance logs);
- Some grievances resolved but not within stated timelines;
- Outreach insufficient in one region or community group, though overall access is functional;
- Public disclosure of grievance data incomplete (e.g., statistics delayed or partial).

Corrective Action for Minor: The Participant must address gaps by the next verification (e.g., improve outreach, complete logs, shorten resolution times, publish data). Repeated or uncorrected minor issues escalate to major.

Proposed Amendments to the TREES Templates Theme 2.4

1. TREES Registration Document (TRD) Template

Section 7 – Safeguards

Under the structure and process indicator (see amendments on box above) for Theme 2.4 please add:

The Participant shall:

- Describe the legal and institutional framework for access to justice relevant to REDD+, including judicial, administrative, customary, or ombudsperson systems;
- Identify and describe the dedicated REDD+ grievance redress mechanism (GRM) to be used, including its structure, mandate, and resources;
- Explain accessibility measures (e.g., intake channels, languages, culturally appropriate procedures) ensuring Indigenous Peoples, Local Communities, Afro-descendant Peoples, women, youth, and vulnerable groups can use the mechanism without cost or discrimination;
- Outline procedures and timelines for grievance intake, acknowledgement, resolution, and escalation, including how stakeholders will be informed of outcomes;
- Describe linkages between the REDD+ GRM and other systems (e.g., courts, administrative appeals, national human rights institutions);
- Explain disclosure arrangements, including how grievance data will be summarized and made available through the Safeguard Information System (SIS) or equivalent platform.

Instructions to Participants: Attach GRM policy documents, SOPs, terms of reference for responsible institutions, and outreach plans to demonstrate accessibility. Provide evidence of resources allocated for the GRM.

For outcome indicator- see recommendations in section 12.3.

2. TREES Monitoring Report (TMR) Template

Section 7- Safeguards

Under the outcome indicator (see amendments on box above) for Theme 2.4 please add:

For the reporting period, the Participant shall:

- Summarize grievances received through the REDD+ GRM and other relevant channels (e.g., courts, ombudspersons), including number, type, and geographic distribution;
- Report on outcomes: how grievances were resolved, remedies provided, and whether complainants were satisfied with the resolution;
- Provide timelines for grievance handling, confirming that grievances were resolved promptly and fairly;
- Describe any escalated cases and how they were addressed (e.g., referral to judicial or higher-level bodies);
- Confirm accessibility and outreach: measures taken during the period to inform stakeholders of the GRM and enable their use of it;
- Summarize public disclosure of grievance data (e.g., statistics or summaries published via the SIS);
- Identify challenges and corrective actions taken to strengthen the effectiveness of the GRM.
- Describe corrective actions taken to the REDD+ program relevant to the Accounting Area and ART issuance of credits as a result of lessons learned through review of grievances.

Instructions to Participants: Please provide grievance logs, anonymized summaries, examples of resolutions, evidence of remedies, and stakeholder feedback (e.g., interviews, satisfaction surveys). Clearly explain how information was disclosed to the public.

Theme 3.1 – Identify indigenous peoples and local communities, or equivalent.

Rationale

Theme 3.1 (Safeguard C) requires jurisdictions to identify all Indigenous Peoples and local communities, or equivalent groups, within REDD+ program areas. This safeguard is foundational because **rights cannot be respected if rights-holders are not identified**.

The current indicators address legal recognition and the need to identify groups, but they risk being interpreted narrowly – limiting recognition only to groups formally acknowledged by government authorities. Field experience shows that such an approach can leave out critical stakeholders, especially:

- Indigenous Peoples without formal recognition,
- Uncontacted or voluntarily isolated peoples,
- Semi-nomadic or transhumant communities, and
- Afro-descendant and other traditional local communities with their own attachment to forests, customary norms, and experience of marginalization.

To close this gap, the indicators should explicitly require **inclusive identification and self-identification processes, where possible (i.e. carve outs for uncontacted or voluntarily isolated peoples)**. This ensures recognition of groups who may not appear in official registries but meet one of the many accepted international definitions of **Indigenous Peoples (including tribal peoples, Afro-descendants, and traditional local communities)** (collectively referred to throughout this paper as “IPs & LCs”).

Additionally, we propose strengthening the Structure/Process indicator to emphasize **procedures that recognize self-identification and customary governance systems** as valid bases for identification, in line with **UNDRIP (Articles 9 and 33)**. This avoids exclusion of peoples based on gaps in national legislation.

At the outcome level, the revised indicator clarifies that all such groups must be **identified, mapped, and documented**, ensuring no omission of groups living in or using forest resources within the REDD+ accounting area.

Together, these changes set a best-practice expectation: REDD+ programs must cast a wide net, actively seeking out and recognizing all potentially affected communities, regardless of formal status.

Proposed Amendment Section 12.4.1 TREES 3.0- Theme 3.1

Structure and Process Indicator (amended):

Participants have in place a legal framework, policies, or programs, ~~as well as~~ **and the** necessary procedures and resources for the identification ~~or~~ **and** self-identification of Indigenous Peoples, Local Communities, Afro-descendant Peoples, or equivalent **groups. This shall explicitly include peoples or communities that may not be formally recognized under national law, such as uncontacted or voluntarily isolated peoples, semi-nomadic or transhuman communities, and traditional forest-dependent groups, and shall take into account their customary laws, institutions, and representative structures in the identification process.**

Outcome Indicator (amended):

Public institutions have **comprehensively** identified Indigenous Peoples, Local Communities, Afro-descendant Peoples, and equivalent **groups** – including **those not formally recognized** – such as uncontacted or voluntarily isolated peoples, **semi-nomadic or** ~~and~~ transhumant communities, **and other traditional groups** living ~~and/or~~ **in or** using forest resources within the REDD+ accounting area. **The identification process has been undertaken in a manner consistent with the principle of self-identification and with recognition of customary institutions.**

Proposed Amendment VVS for Section 12.4.1 TREES 3.0 Theme 3.1

Validation Scope

The VVB shall confirm that the Participant has:

1. Listed all Indigenous Peoples, Local Communities, Afro-descendant Peoples, or equivalent groups within the REDD+ accounting area, including those not formally recognized in national law.
2. Described the process used for identification, demonstrating:
 - Use of self-identification by groups themselves;
 - Consideration of customary laws, institutions, and representative structures;
 - Inclusion of uncontacted/voluntarily isolated peoples, semi-nomadic/transhumant communities, and traditional forest-dependent groups where present.
3. Referenced data sources used (e.g., national censuses, indigenous registries, anthropological studies, participatory mapping, NGO records).
4. Outlined institutional responsibilities for identification and engagement of IPs & LCs.
5. Explained measures to ensure that no group is omitted, including consultations with representative organizations and independent experts, especially as related to uncontacted/voluntarily isolated peoples that cannot and should not be accessed.

Evidence may include: stakeholder mapping reports, participatory maps, anthropological or legal studies, registry data, consultation records with IPLC organizations, and safeguard assessments.

Verification Scope

The VVB shall verify, during each monitoring period, that:

1. All identified groups are still recognized in implementation, and no new groups were overlooked.
2. Stakeholder engagement records confirm that identified groups were consulted or otherwise included in REDD+ implementation.
3. Interviews with stakeholders (community representatives, NGOs, customary leaders) corroborate that communities were recognized in line with their right to self-identification.
4. Grievance mechanisms (Theme 2.4) were available and used to address any disputes over group recognition or representation.
5. Updates were made if additional groups emerged (e.g., newly documented settlements, migratory groups) and integrated into program safeguards.

Evidence may include: updated stakeholder maps, meeting attendance lists, signed letters of representation, stakeholder interviews, grievance logs, and independent monitoring reports.

Findings (See Safeguard Guidance (Annex I), Section 3.6.3.4)

Major Non-Conformance:

- Failure to identify one or more significant IPLC groups present in the accounting area;
- Reliance solely on legal recognition while ignoring self-identified or customary groups and otherwise conformance with recognized definitions of Indigenous Peoples and other forest dependent local communities;
- Evidence of systematic exclusion or misidentification of communities;
- Rejection of self-identification claims without due process.

Minor Non-Conformance:

- Identification generally complete, but documentation is partial (e.g., incomplete mapping, missing references to self-identification processes);
- One or more small groups identified late, without substantive harm to their participation or rights;
- Stakeholder mapping updates pending but underway.

Corrective Action for Minor: The Participant must update documentation, finalize mapping, or confirm recognition of all groups by the next verification. Repeated or uncorrected minor gaps escalate to major.

Proposed Amendments to the TREES Templates Theme 3.1

1. TREES Registration Document (TRD) Template

Section 7 – Safeguards

Under the structure and process indicator (see amendments on box above) for Theme 3.1 please add:

The Participant shall:

- List all Indigenous Peoples, Local Communities, Afro-descendant Peoples, or equivalent groups present in or using forest resources within the accounting area, including groups not formally recognized under national law;
- Describe the methods used for identification, including reliance on self-identification, engagement with customary institutions, consultation with representative organizations, and reference to anthropological, legal, or demographic studies;
- Confirm inclusion of uncontacted or voluntarily isolated peoples, semi-nomadic or transhumant groups, and other traditional forest-dependent communities where applicable;
- Provide supporting evidence such as participatory maps, stakeholder mapping reports, registry data, and consultation records;
- Explain institutional responsibilities for maintaining and updating the IPLC list and ensuring all relevant groups are consistently included in REDD+ program design and implementation.

Instructions to Participants: Attach a stakeholder identification report or annex, including maps, tables, and documentation of self-identification processes. Clearly note where groups are recognized through customary laws or community institutions, even if not formally registered under national law.

For outcome indicator- see recommendations in section 12.3

2. TREES Monitoring Report (TMR) Template

Section 7- Safeguards

Under the outcome indicator (see amendments on box above) for Theme 3.1 please add:

For the reporting period, the Participant shall:

- **Confirm that all Indigenous Peoples, Local Communities, Afro-descendant Peoples, or equivalent groups identified in the TRD remain included in REDD+ implementation;**
- **Report updates to the identification list (e.g., newly documented settlements, semi-nomadic groups, transhumant communities) and describe how these groups were integrated into program safeguards;**
- **Provide evidence of ongoing recognition and engagement, such as updated stakeholder maps, consultation records, or community attestations;**
- **Summarize any grievances raised regarding group recognition or representation (link to Theme 2.4) and how these were addressed;**
- **Describe measures taken to ensure the right to self-identification and the recognition of customary institutions continues to guide the process.**

Instructions to Participants: Attach updated stakeholder lists, maps, or registry references. Provide anonymized summaries of grievances or disputes related to group identification, including resolutions. Where applicable, note any changes in customary representation or governance recognized during the reporting period.

Theme 3.2 – Respect and protect traditional knowledge and practices

Rationale

Theme 3.2 safeguards the **traditional knowledge and practices** of Indigenous Peoples, Local Communities, Afro-descendant Peoples, and equivalent groups. Respecting and protecting this knowledge is critical, as REDD+ programs often depend on traditional practices of forest stewardship, conservation, and sustainable use.

The current indicators recognize the need for respect and protection but do not explicitly define the **standard of consent** required when such knowledge is used. Field experience shows that without clarity, “permission” may be interpreted loosely, potentially leading to superficial or coerced agreements.

International norms – including the **Nagoya Protocol (CBD Article 8j)** and **UNDRIP Article 31** – establish that use of traditional knowledge requires **Free, Prior, and Informed Consent (FPIC)** from knowledge holders, and that benefits arising from such use must be **shared equitably**. This ensures traditional knowledge is not misappropriated or exploited without recognition and reciprocity.

The amendments therefore:

- Strengthen the **Structure/Process indicator** to require frameworks that explicitly provide for **FPIC and benefit-sharing** in relation to traditional knowledge, including recognition of **customary laws and intellectual property rights**;
- Amend the **Outcome indicator** to clarify that traditional knowledge was not recorded or used without **FPIC**, and that **equitable benefit-sharing** occurred when knowledge contributed to REDD+ outcomes.

These refinements align TREES with international obligations under the **CBD, Nagoya Protocol, and UNDRIP**, ensuring that REDD+ contributes to both environmental and cultural integrity.

Proposed Amendment Section 12.4.1 TREES 3.0- Theme 3.2

Structure and Process Indicator (amended):

Participants have in place a legal framework, policies, or programs, ~~as well as~~ **together with** the necessary procedures and resources, to respect and protect the traditional knowledge and practices of Indigenous Peoples, Local Communities, Afro-descendant Peoples, or equivalent (including uncontacted and transhumant communities) in the implementation of REDD+ activities. **These frameworks shall explicitly require that traditional knowledge is not accessed, recorded, or used without the Free, Prior, and Informed Consent (FPIC) of the knowledge-holders, and that any benefits derived from its use are shared equitably with them, consistent with customary law, intellectual property rights, and relevant international agreements (e.g. CBD, Nagoya Protocol, UNDRIP, ICERD, ICESCR).**

Outcome Indicator (amended):

Public institutions have respected and protected the traditional knowledge and practices of Indigenous Peoples, Local Communities, Afro-descendant Peoples, or equivalent (including those of uncontacted and transhumant communities) in the design and implementation of REDD+ activities, **ensuring that such knowledge was not recorded or used without the knowledge-holders' FPIC and that any benefits derived from its use were shared equitably with them.**

Proposed Amendment VVS for Section 12.4.1 TREES 3.0 Theme 3.2

Validation Scope

The VVB shall confirm that the Participant has:

- 1. Identified relevant traditional knowledge and practices potentially used or affected by REDD+ activities (e.g., traditional fire management, agroforestry, biodiversity monitoring, cultural forest uses).**
- 2. Established legal or policy frameworks to respect and protect traditional knowledge, explicitly requiring Free, Prior, and Informed Consent (FPIC) and equitable benefit-sharing when knowledge is accessed or applied.**
- 3. Outlined procedures for obtaining FPIC, including culturally appropriate methods, use of customary institutions, timelines for community deliberation, and documentation standards.**
- 4. Defined benefit-sharing arrangements where traditional knowledge contributes to REDD+ outcomes (e.g., revenue, recognition, or livelihood benefits for knowledge holders).**
- 5. Designated institutional responsibilities for overseeing compliance with FPIC and benefit-sharing in relation to traditional knowledge.**

Evidence may include: REDD+ strategy sections referencing traditional knowledge; FPIC protocols; benefit-sharing plans; customary law recognition provisions; draft agreements or MOUs with communities; and references to CBD/Nagoya obligations.

Verification Scope

The VVB shall verify, during each monitoring period, that:

1. No traditional knowledge was used without FPIC. Documentation must show signed agreements, resolutions, or testimonies from knowledge-holders.
2. FPIC processes were implemented in culturally appropriate ways (e.g., use of local languages, respect for customary decision-making bodies, adequate time for deliberation, independent facilitation if needed).
3. Benefits from knowledge use were equitably shared with knowledge-holders, demonstrated through financial records, non-monetary support, or community-level programs.
4. Stakeholders confirm that traditional knowledge was respected, not misappropriated, and that consent was freely given. This is verified through interviews with IPLC representatives, customary leaders, and NGOs.
5. Grievances related to traditional knowledge (if any) were logged and resolved promptly through the GRM (Theme 2.4).

Evidence may include: FPIC agreements; benefit-sharing records; testimonies from knowledge-holders; monitoring reports; grievance logs; and SIS disclosures on knowledge use and benefits delivered.

Findings (See Safeguard Guidance (Annex I), Section 3.6.3.4)

Major Non-Conformance:

- Traditional knowledge was recorded, accessed, or used without FPIC;
- FPIC was obtained through coercion, manipulation, or without adequate information/time;
- Benefits derived from knowledge use were withheld or diverted from the knowledge-holders;
- Documented grievances about misappropriation of traditional knowledge remain unresolved.

Minor Non-Conformance:

- Evidence exists that FPIC was obtained and benefits shared, but some documentation is incomplete (e.g., missing meeting minutes, incomplete translation records);
- Small delays in delivering agreed benefits, provided corrective measures are underway and stakeholders confirm no loss of trust or harm to the affected stakeholder;
- Monitoring or reporting gaps (e.g., not disclosing knowledge-related contributions in SIS) that do not undermine actual protection of knowledge.

Corrective Action for Minor: The Participant must close documentation/reporting gaps or complete delayed benefit-sharing by the next verification. Repeated or uncorrected issues escalate to major.

Proposed Amendments to the TREES Templates Theme 3.2

1. TREES Registration Document (TRD) Template

Section 7 – Safeguards

Under the structure and process indicator (see amendments on box above) for Theme 3.2 please add:

The Participant shall:

- Describe relevant traditional knowledge and practices of Indigenous Peoples, Local Communities, Afro-descendant Peoples, or equivalent groups that may intersect with REDD+ activities (e.g., forest management, agroforestry, fire control, biodiversity use, or cultural practices);
- Explain the legal and institutional framework for protecting traditional knowledge, including recognition of customary law and relevant international commitments (e.g., CBD Article 8(j), Nagoya Protocol, UNDRIP Article 31);
- Describe FPIC procedures that will be applied before any traditional knowledge is accessed, recorded, or used in REDD+ activities, including how FPIC will be sought, documented, and verified in culturally appropriate ways;
- Explain benefit-sharing arrangements for cases where traditional knowledge contributes to REDD+ outcomes (e.g., payments, recognition, or community-level benefits);
- Identify responsible institutions overseeing protection, FPIC, and benefit-sharing in relation to traditional knowledge.

Instructions to Participants: Attach supporting documentation (FPIC protocols, draft agreements, benefit-sharing plans, recognition of customary law, or community protocols). Provide evidence of consultation with knowledge-holders and describe outreach measures to inform communities of their rights.

For outcome indicator- see recommendations in section 12.3

2. TREES Monitoring Report (TMR) Template

Section 7- Safeguards

Under the outcome indicator (see amendments on box above) for Theme 3.2 please add:

For the reporting period, the Participant shall:

- Confirm that traditional knowledge was respected and protected, and that no knowledge was accessed, recorded, or used without FPIC;
- Report FPIC processes undertaken where traditional knowledge was used, including evidence such as meeting records, signed agreements, or attestations from knowledge-holders;
- Document benefit-sharing outcomes linked to traditional knowledge use (e.g., payments, recognition, or in-kind benefits delivered to communities);
- Describe measures taken to prevent misappropriation of traditional knowledge (e.g., safeguarding sensitive information, confidentiality agreements);
- Summarize any grievances raised regarding traditional knowledge and how they were resolved (cross-reference Theme 2.4 on access to justice);
- Provide disclosure evidence (e.g., summaries of knowledge-related contributions and benefits published through the SIS).

Instructions to Participants: Provide qualitative and quantitative evidence (agreements, case studies, beneficiary reports, grievance records). Disaggregate reporting where possible (by community, gender, or group) to demonstrate inclusivity.

Theme 3.3 – Respect, protect, and fulfill rights of Indigenous Peoples, Local Communities, and Afro-descendant Peoples, or equivalent

Rationale

Theme 3.3 is one of the most critical safeguards, addressing Cancún Safeguard C’s requirement to **respect, protect, and fulfill the rights of Indigenous Peoples and Local Communities (IP and LCs)**. The current TREES text recognizes these rights but does not make explicit three core elements that international best practice requires:

1. **Anchoring in international human rights obligations and respect for customary laws:** Rights protection must extend beyond compliance with national law to include applicable international human rights treaties (e.g., **ICCPR, ICESCR, ICERD, CEDAW, ILO 169**) and agreements, as the **UN Declaration on the Rights of Indigenous Peoples (UNDRIP)**, as well as respect for communities’ **own customary laws and institutions**.
2. **FPIC as a general safeguard obligation:** Currently, FPIC is only explicit in cases of involuntary relocation (Theme 2.3) or implied through participation (Theme 4.2). This is insufficient. In alignment with applicable international obligations, FPIC must apply to **all REDD+ activities that may affect rights, lands, territories, resources, livelihoods, or cultural heritage**, ensuring no credits are issued at the expense of IP and LC rights.
3. **Clarity on FPIC implementation standards:** FPIC processes must be undertaken in culturally appropriate ways, using the communities’ chosen representatives, in local languages, with sufficient time for deliberation, and free of coercion. Documentation (e.g., signed agreements, meeting records, attestations) must be available for verification.

By making these requirements explicit, TREES 3.0 will:

- Ensure REDD+ activities are carried out **on IP and LCs’ own terms**, respecting their own customary norms, practices, and institutions and consistent with global human rights norms;
- Close the gap between “consultation” and “consent,” reinforcing FPIC as a **non-negotiable safeguard obligation**;
- Provide VVBs with clear, verifiable benchmarks, thereby strengthening credibility and investor confidence.

In sum, these amendments will make TREES 3.0 a **best-in-class standard**, fully aligned with **UNDRIP Articles 10, 19, and 32**, the **Voluntary Guidelines on the Responsible Governance of Tenure (VGCT)**, and the growing body of safeguard jurisprudence affirming FPIC as a fundamental human right.

Proposed Amendment Section 12.4.1 TREES 3.0- Theme 3.3

Structure and Process Indicator (amended):

Participants have in place a legal framework, policies, or programs, as well as the necessary procedures and resources, to respect, protect, and fulfill the human rights of Indigenous Peoples, Local Communities, and Afro-descendant Peoples, or equivalent (including uncontacted and transhumant communities), ~~in conformity with customary law, institutions, and practices,~~ throughout the design and implementation of REDD+ activities and REDD+ benefit distribution. **These frameworks shall respect customary laws, institutions, and practices of the peoples concerned, and be consistent with the country’s international relevant human rights obligations (including ICCPR, ICESCR, ICERD, CEDAW, ILO 169, and the UN Declaration on the Rights of Indigenous Peoples). Procedures shall require that any REDD+ activity that may affect these communities’ rights, lands, resources, territories, livelihoods, or cultural heritage be undertaken**

only with their Free, Prior, and Informed Consent (FPIC) in alignment with applicable and relevant international obligations.

Outcome Indicator (amended):

Public institutions have respected, protected, and fulfilled the rights of Indigenous Peoples, Local Communities, and Afro-descendant Peoples, or equivalent (including uncontacted and transhumant communities), in the design and implementation of REDD+ activities (including carbon rights and REDD+ benefit distribution), **in a manner that respects those peoples' customary laws and institutions and in accordance with the country's international human rights obligations.**

Public institutions have obtained and documented the Free, Prior, and Informed Consent (FPIC) of affected Indigenous Peoples, Local Communities, Afro-descendant Peoples, or equivalent, through their chosen representative institutions, for any REDD+ activities that may affect their rights, lands, resources, territories (whether titled or untitled), traditional livelihoods, or tangible and intangible cultural heritage.

FPIC processes shall be undertaken in a culturally appropriate manner, in the local language(s), through the representatives chosen by the affected community, with adequate time for community deliberation, and shall be free from coercion or manipulation. Documentation shall include signed agreements or other verifiable records of consent (e.g., community resolutions, attestations, or audiovisual records).

Proposed Amendment VVS for Section 12.4.1 TREES 3.0 Theme 3.3

Validation Scope

The VVB shall confirm that the Participant has:

1. Rights Framework & Anchoring

- Identified applicable international human rights obligations (e.g., ICCPR, ICESCR, ICERD, CEDAW, ILO 169, UNDRIP) and described how these are integrated into REDD+ design and benefit distribution.
- Described how the program will operate in conformity with customary laws, institutions, and practices of the concerned peoples (e.g., recognition of representative bodies, customary decision rules).

2. FPIC Policy & Triggers

- Adopted a policy that requires FPIC for any REDD+ activity that may affect IP and LCs' rights, lands, territories (titled or untitled), resources, livelihoods, or cultural heritage (not limited to relocation).
- Defined clear FPIC triggers, sequencing, and approval gates (no activity initiated until FPIC concluded where required).

3. FPIC Procedure & Minimum Standards

- Established procedures consistent with minimum FPIC standards: use of chosen representatives, local languages, culturally appropriate engagement, adequate time for deliberation, absence of coercion, and documentation requirements (e.g., signed agreements, resolutions, attestations).
- Clarified grievance escalation for rights/FPIC issues (link to Theme 2.4 GRM).

4. Institutional Roles & Resourcing

- Designated responsible institutions/units for rights compliance and FPIC implementation, with adequate budget and capacity (e.g., translators, independent facilitators/observers).

Evidence may include: rights compliance plan; references to international obligations; FPIC policy/protocol; screening/trigger matrix; sample consent templates; TORs for independent observers; budget lines; linkage to GRM/SIS.

Verification Scope

The VVB shall verify, during each monitoring period, that:

1. No Rights Infringement

- REDD+ implementation did not infringe IPLC rights; stakeholders retained control/access to lands, territories, resources, livelihoods, and heritage.
- Any restrictions or changes were preceded by FPIC and reflected community-agreed conditions.

2. FPIC Implementation & Evidence

- For each rights-affecting activity, FPIC records exist and meet minimum standards:
 - Evidence of culturally appropriate engagement (language, venue, customary processes).
 - Proof of adequate time for deliberation and absence of coercion.
 - Verifiable consent documentation (e.g., signed agreements, community resolutions, audio/video attestations, third-party observer notes).
- If consent was conditional, the Participant honoured all conditions (check implementation evidence).

3. Customary Institutions & Representation

- Engagement and decision-making occurred through communities' chosen representative institutions; no bypassing or substitution without community mandate.
- Where representation disputes arose, they were handled in line with customary norms and due process.

4. Evolving Context & Updates

- The Participant tracked relevant legal or policy changes (national/international) and updated rights practices accordingly.
- Participants identified potential rights impacts of program activities, put in place measures to avoid and mitigate such measures.
- New or revised activities underwent FPIC where applicable.

5. Complaints & Remedies

- Rights grievances (Theme 2.4) were handled promptly and fairly; remedies provided are viewed as legitimate and effective by complainants.
- No evidence of retaliation or intimidation against community members/representatives.

6. Stakeholder Corroboration

- Interviews with IPLC leaders, women, youth, and civil society confirm free and informed decision-making and consent outcomes; any dissent is transparently recorded and addressed.

Evidence may include: FPIC dossiers per activity; observer/mediator reports; implementation evidence for consent conditions; minutes of assemblies; translations/materials shared; GRM files; remedial action records; stakeholder interview notes; assessments of risks to rights and avoidance and mitigation measures.

Findings (See Safeguard Guidance (Annex I), Section 3.6.3.4)

Major Non-Conformance (any one triggers major):

- Evidence that REDD+ proceeded without FPIC for a rights-affecting activity (including but not limited to relocation, land/resource access restrictions, limitations to ERR rights/benefit-sharing decisions affecting community rights).
- FPIC process invalid (e.g., coercion, misinformation, inadequate time, wrong representatives, lack of documentation), or conditions of consent not honoured.
- Infringement of IPLC rights (land/territory/resource/culture/livelihoods) attributable to REDD+ implementation.
- Systematic bypass of customary institutions or rejection of self-determined representation.
- Credible rights/FPIC grievances unresolved or evidence of retaliation against complainants.

Minor Non-Conformance (all must hold):

- Substantive FPIC and rights protection occurred, no rights were harmed, but there are documentation or procedural gaps (e.g., missing translation records, partial minutes, minor delay in final signatures) without prejudice to the validity of community consent.
- Small representational issues resolved promptly through customary processes.
- Minor inconsistencies in reporting/archiving that do not cast doubt on consent/outcomes and are under corrective action.

Corrective Action for Minor: Close documentation gaps; regularize archiving; reinforce FPIC training/translation; document community confirmation. Uncorrected or recurring minor issues escalate to major.

Proposed Amendments to the TREES Templates Theme 3.3

1. TREES Registration Document (TRD) Template

Section 7 – Safeguards

Under the structure and process indicator (see amendments on box above) for Theme 3.3 please add:

The Participant shall:

- Describe the legal and institutional framework for protecting the rights of Indigenous Peoples, Local Communities, Afro-descendant Peoples, or equivalent groups, including reference to international obligations (e.g., ICCPR, ICESCR, ICERD, CEDAW, ILO 169, UNDRIP) and customary laws/institutions recognized by the concerned peoples;
- Identify REDD+ activities that may affect IPs & LCs' rights, lands, resources, territories, livelihoods, or tangible/intangible cultural heritage;

- Explain FPIC procedures to be applied for all rights-affecting activities, including triggers, sequencing, and minimum standards (use of chosen representatives, local languages, culturally appropriate processes, adequate time, absence of coercion, full documentation);
- Attach or reference a FPIC protocol (national or program-specific), templates for documenting consent, and institutional roles/responsibilities for implementation and oversight;
- Describe arrangements for grievance handling and remedies linked to FPIC or rights concerns (cross-reference Theme 2.4);
- Provide evidence of outreach and capacity support to ensure that communities understand their rights to give or withhold consent.

Instructions to Participants: Attach supporting documentation such as FPIC policies, legal analyses, consultation plans, draft agreements, and community protocols. Clearly demonstrate how the REDD+ strategy and benefit-sharing plan comply with international human rights obligations and customary institutions.

For outcome indicator- see recommendations in section 12.3

2. TREES Monitoring Report (TMR) Template

Section 7- Safeguards

Under the outcome indicator (see amendments on boxes above) for Theme 3.3 please add:

For the reporting period, the Participant shall:

- Confirm that rights of IPs & LCs were respected and fulfilled throughout REDD+ implementation, consistent with customary laws/institutions and international human rights obligations;
- Report FPIC processes undertaken for any rights-affecting activities, including:
 - Documentation of community consent (e.g., agreements, resolutions, attestations, observer reports);
 - Evidence that minimum standards were met (representatives chosen by communities, culturally appropriate processes, local languages, adequate time, absence of coercion);
 - Conditions set by communities and how these were implemented;
- Describe any rights-related grievances raised, how they were handled, and remedies provided (cross-reference Theme 2.4 reporting);
- Report on any updates to national or international human rights obligations during the period and how they were integrated into REDD+ safeguards;
- Provide stakeholder feedback from IPs & LCs (including women, youth, vulnerable groups) on whether their rights and consent processes were respected.

Instructions to Participants: Attach FPIC documentation for each relevant activity, anonymized grievance summaries, evidence of remedies, and records of community satisfaction. Disaggregate reporting where possible (e.g., by people, group, or gender).

Theme 4.1 – Respect, protect, and fulfill the right of all relevant stakeholders to participate fully and effectively in the design and implementation of REDD+ activities

Rationale

Theme 4.1 under Cancún Safeguard D requires the full and effective participation of all relevant stakeholders in REDD+ design and implementation. The existing TREES indicator language is already strong, recognizing women, youth, and vulnerable groups as rights-holders in participation.

However, participation must be explicitly reinforced in relation to two core sections of TREES 3.0:

- **Section 3.4.1 (ERR Rights)**, where stakeholders – especially those with land, resource, or carbon claims – must be actively involved in clarifying who holds emission reduction/removal rights, and in resolving overlapping claims.
- **Section 3.4.2 (Benefit Sharing)**, where stakeholders must participate in defining who is eligible, what allocation principles are applied, and how benefit-sharing arrangements are designed and implemented.

Without explicit linkages, stakeholder participation risks being treated as generic consultation, rather than being embedded at these critical decision points.

The amendments therefore:

- Strengthen the **Structure/Process indicator** by explicitly requiring participation in both ERR rights clarification and benefit-sharing arrangements;
- Adjust the **Outcome indicator** to confirm that stakeholders were included effectively in these processes and could influence outcomes.

This ensures TREES 3.0 aligns with UNDRIP Article 18 (among others) and Cancún Safeguard D, while operationalizing safeguards across Sections 3.4.1 and 3.4.2 – preventing disputes, strengthening legitimacy, and building trust.

Proposed Amendment Section 12.4.1 TREES 3.0- Theme 4.1

Structure and Process Indicator (amended):

Participants have in place a legal framework, policies, or programs, together as well as the necessary procedures and resources, to respect, protect, and fulfill the right of all relevant stakeholders, including women, youth, and vulnerable groups, to participate fully and effectively (including timely access to information prior to consultations and access to recourse mechanisms to ensure the participation process is respected) in: (i) the design and implementation of REDD+ activities ~~as well as in the decisions about the distribution of REDD+ benefits~~; **(ii) the clarification of Emission Reductions and Removals (ERR) rights as required under Section 3.4.1; and (iii) the development and implementation of benefit-sharing arrangements as required under Section 3.4.2.**

Outcome Indicator (amended):

Public institutions have respected, protected, and fulfilled the right of all relevant stakeholders, including women, youth, and vulnerable groups, to participate fully and effectively in: **(i) the design and implementation of REDD+ activities; (ii) the clarification of Emission Reductions and Removals (ERR) rights under Section 3.4.1; and decisions about the distribution of REDD+ benefits** (iii) the development

and implementation of benefit-sharing arrangements under Section 3.4.2. Evidence demonstrates that participation was inclusive, timely, and allowed stakeholders to influence decisions.

Proposed Amendment VVS for Section 12.4.1 TREES 3.0 Theme 4.1

Validation Scope

The VVB shall confirm that the Participant has:

1. Identified all relevant stakeholders (including women, youth, vulnerable groups, Indigenous Peoples, Local Communities, Afro-descendant Peoples, private sector, and subnational governments) expected to be affected by or engaged in REDD+ activities.
2. Established procedures to ensure these stakeholders can participate fully and effectively in:
 - The design and implementation of REDD+ activities;
 - The clarification of ERR rights (Section 3.4.1), including how competing claims will be resolved;
 - The development and implementation of benefit-sharing arrangements (Section 3.4.2).
3. Described participatory mechanisms (e.g., multi-stakeholder committees, consultation processes, representation on benefit-sharing bodies) and measures to ensure inclusivity of marginalized groups.
4. Outlined safeguards for effective participation, including timely access to relevant information (Theme 2.1), adequate resourcing, culturally appropriate engagement, and recourse mechanisms to challenge exclusion.

Evidence may include: stakeholder mapping (differentiating between rights holders and interested parties), stakeholder engagement plans; ERR rights clarification process documents; draft benefit-sharing plans; TORs of multi-stakeholder committees; records of outreach and consultation design.

Verification Scope

The VVB shall verify, during each monitoring period, that:

1. Stakeholders were able to participate effectively in REDD+ design and implementation, ERR rights clarification, and benefit-sharing arrangements.
2. Consultation and decision-making records (e.g., meeting minutes, attendance lists, submissions, consensus statements) show participation of all identified stakeholder categories, including marginalized groups.
3. Stakeholders confirm through interviews that they were aware of and able to participate in these processes, and that their views influenced outcomes (e.g., shaping ERR rights agreements or allocation principles in benefit-sharing).
4. ERR rights demonstration (3.4.1) included consultation and agreements with affected rightsholders, consistent with safeguards and FPIC requirements.
5. Benefit-sharing arrangements (3.4.2) were developed with stakeholder input and reflect agreed principles of transparency, equity, and inclusiveness.
6. Ongoing participation mechanisms (e.g., steering committees, local monitoring groups) are functional and accessible to all relevant stakeholders.

Evidence may include: validated stakeholder lists; ERR rights agreements; benefit-sharing plan consultation records; committee minutes; stakeholder interviews; grievance logs relating to participation; public records of decisions.

Findings (See Safeguard Guidance (Annex I), Section 3.6.3.4)

Major Non-Conformance:

- Failure to include key stakeholder groups (e.g., IPs & LCs, women, vulnerable groups) in REDD+ design, ERR rights clarification, or benefit-sharing development;
- Evidence that consultations were tokenistic (e.g., stakeholders informed but not allowed to influence decisions);
- ERR rights agreements or benefit-sharing arrangements developed without stakeholder participation or contrary to safeguard requirements;
- Systematic exclusion or intimidation of stakeholders, or disregard for FPIC obligations where applicable.

Minor Non-Conformance:

- Participation generally occurred, but with documentation gaps (e.g., incomplete records of stakeholder inputs);
- Certain marginalized groups had limited participation opportunities, though corrective measures are underway and no material harm occurred;
- Delays or minor procedural flaws in consultations (e.g., late notice, limited translation) that did not fundamentally undermine stakeholders' ability to participate.

Corrective Action for Minor: The Participant must close documentation gaps, strengthen inclusivity measures, or adjust participatory mechanisms by the next verification. Repeated or unaddressed minor issues escalate to major.

Proposed Amendments to the TREES Templates Theme 4.1

1. TREES Registration Document (TRD) Template

Section 7 – Safeguards

Under the structure and process indicator (see amendments on box above) for Theme 4.1 please add:

The Participant shall:

- List all relevant stakeholder groups to be engaged in REDD+ activities, including Indigenous Peoples, Local Communities, Afro-descendant Peoples, women, youth, vulnerable groups, private sector actors, and subnational entities;
- Describe mechanisms that guarantee full and effective participation in:
 - (i) the design and implementation of REDD+ activities;
 - (ii) the clarification of Emission Reductions and Removals (ERR) rights (Section 3.4.1), including agreements with other rightsholders; and
 - (iii) the development and implementation of benefit-sharing arrangements (Section 3.4.2);
- Explain procedures to ensure inclusivity, such as culturally appropriate methods, translation, gender-sensitive approaches, youth representation, and targeted outreach to vulnerable groups;
- Describe access to information arrangements (cross-reference Theme 2.1) to guarantee timely and accessible disclosure before consultations (including drafts of emerging ERR and benefit sharing arrangements in full (not just summaries));

- Identify recourse mechanisms available if stakeholders believe participation rights were not respected (cross-reference Theme 2.4);
- Provide supporting evidence (e.g., stakeholder engagement plans, TORs of multi-stakeholder committees, consultation frameworks, or agreements on ERR rights).

Instructions to Participants: Attach a stakeholder engagement plan or equivalent annex, with details of planned consultations, representation in decision-making bodies, and monitoring of participation quality. Clearly demonstrate how stakeholder engagement informs ERR rights clarification and benefit-sharing design.

For outcome indicator- see recommendations in section 12.3

2. TREES Monitoring Report (TMR) Template

Section 7- Safeguards

Under the outcome indicator (see amendments on box above) for Theme 4.1 please add:

For the reporting period, the Participant shall:

- Confirm that all relevant stakeholders were given opportunities to participate in REDD+ design and implementation, ERR rights clarification (Section 3.4.1), and benefit-sharing arrangements (Section 3.4.2);
- Provide evidence of participation, such as consultation records, meeting minutes, attendance lists, stakeholder submissions, or agreements reached;
- Describe inclusivity outcomes, including participation of women, youth, vulnerable groups, and Indigenous/local governance bodies;
- Report on stakeholder influence, summarizing how inputs were incorporated into ERR rights agreements, REDD+ implementation design, or benefit-sharing allocation criteria;
- Summarize grievances raised about participation (cross-reference Theme 2.4) and how they were resolved;
- Identify challenges and corrective measures taken to strengthen participation quality during the reporting period.

Instructions to Participants: Attach supporting documentation such as consultation summaries, decision records, or updated stakeholder lists. Where applicable, provide disaggregated information by stakeholder group (e.g., gender, youth, vulnerable groups) to demonstrate inclusivity.

Theme 4.2 – Develop adequate participatory procedures for the effective participation of Indigenous Peoples, Local Communities and Afro-descendant Peoples, or equivalent.

Rationale

Theme 4.2 is a focused elaboration of Cancún Safeguard D, addressing the **participation of Indigenous Peoples, Local Communities, and Afro-descendant Peoples** in REDD+ activities. The current indicators emphasize that participation should occur through communities' **own decision-making structures** and using **culturally appropriate procedures**. While strong, the indicators remain implicit on one critical safeguard: **Free, Prior, and Informed Consent (FPIC)**.

International standards – especially **UNDRIP Articles 19 and 32** – require FPIC for any legislative or administrative measures, or projects, that may affect indigenous lands, territories, or resources. Similarly, leading REDD+ and climate finance standards (e.g., **FCPF, VCS JNR**) explicitly mandate FPIC. Without explicit reference, there is a risk that participation could be reduced to mere consultation rather than **genuine consent**.

The amendments therefore:

1. Explicitly reference **FPIC** as a condition for participation in any REDD+ activity that may affect IPs & LCs’ rights, lands, territories, livelihoods, or cultural heritage.
2. Clarify that FPIC must be obtained **through the communities’ own representative institutions**, in **local languages**, with **adequate time for deliberation**, and free from coercion.
3. Extend the participation scope to include not just REDD+ design and benefit-sharing, but also **ERR rights clarification (Section 3.4.1)**, ensuring IPs & LCs influence foundational decisions about carbon rights.

In summary, the proposed amendments below make explicit that **meaningful participation = participation + consent**, a critical safeguard distinction. This ensures TREES 3.0 sets a high bar consistent with **Cancún Safeguards (c) and (d)**, UNDRIP, and international best practice– providing clarity to Participants and verifiability for VVBs.

Proposed Amendment Section 12.4.1 TREES 3.0- Theme 4.2

Structure and Process Indicator (amended):

Participants have in place a legal framework, policies, or programs, as well as the necessary procedures and resources, to guarantee that the participation of Indigenous Peoples, Local Communities, Afro-descendant Peoples, or equivalent in ~~the design and implementation of REDD+ activities or equivalent in the design and implementation of REDD+ activities as well as in the decisions about the distribution of REDD+ benefits~~ – **including the design and implementation of REDD+ actions, the clarification of Emission Reductions and Removals (ERR) rights (Section 3.4.1), and decisions about benefit-sharing (Section 3.4.2)** – occurs through their ~~respective own~~ **own** decision-making structures and processes, ~~ensuring adequate conditions for their participation and using~~ **ensuring adequate conditions for their participation and using** culturally appropriate procedures. **Such participation shall include obtaining their Free, Prior, and Informed Consent (FPIC) for any activities that may affect their rights, lands, territories, resources, traditional livelihoods, or tangible/intangible cultural heritage.**

Outcome Indicator (amended):

Public institutions have guaranteed that the participation of Indigenous Peoples, Local Communities, Afro-descendant Peoples, or equivalent in ~~the design and implementation of REDD+ activities~~ **implementation** – **including in the design and implementation of REDD+ actions, clarification of ERR rights, and decisions on the distribution of benefits** – occurred through their ~~respective own~~ **own** decision-making structures and **culturally appropriate** processes, ~~ensuring adequate conditions for their participation and using culturally appropriate procedures.~~ **FPIC was obtained for any activities that may affect their rights, lands, territories (whether titled or untitled), resources, traditional livelihoods, or tangible/intangible cultural heritage. FPIC processes were undertaken in a culturally appropriate manner, in local languages, through representatives chosen by the communities themselves, with adequate time for deliberation, free from coercion, and fully documented (e.g., signed agreements, resolutions, or verifiable records).**

Proposed Amendment VVS for Section 12.4.1 TREES 3.0 Theme 4.2

Validation Scope

The VVB shall confirm that the Participant has:

1. Participation Framework & Scope

- Described legal/policy frameworks and program procedures that guarantee IPLC participation through their own decision-making structures and culturally appropriate processes.
- Explicitly extended participation to:
 - (i) REDD+ design and implementation;
 - (ii) ERR rights clarification (Section 3.4.1); and
 - (iii) Benefit-sharing design and implementation (Section 3.4.2).

2. FPIC Policy & Minimum Standards

- Adopted a policy requiring FPIC for any activity that may affect IPLC rights, lands, territories (titled or untitled), resources, livelihoods, or cultural heritage.
- Defined minimum FPIC standards: use of communities' chosen representatives; local languages; culturally appropriate methods; adequate time for deliberation; absence of coercion/manipulation; and documentation (e.g., signed agreements/resolutions, attestations, audiovisual records, or third-party observer notes).

3. Operational Procedures

- Established participation procedures (e.g., multi-level consultations, assemblies, representation on decision bodies) that detail how inputs influence decisions, how dissent is handled, and how participation interfaces with ERR rights agreements and benefit-sharing arrangements.
- Clarified resourcing (translation, facilitation, travel, independent support) to enable effective participation, including women and vulnerable groups.

4. Linkages to Access to Information & Remedies

- Cross-referenced Theme 2.1 (timely, accessible disclosure prior to consultations) and Theme 2.4 (GRM for participation/FPIC complaints and remedies).

Evidence may include: participation/FPIC policy; FPIC protocol and trigger matrix; consultation plan and timelines; representation rules; budget lines for participation support; TORs of multi-stakeholder/indigenous bodies; references to Sections 3.4.1 and 3.4.2.

Verification Scope

The VVB shall verify, during each monitoring period, that:

1. Effective Participation Occurred

- Records (minutes, attendance, submissions, decisions) show ILPC participation through their own institutions in:
 - (i) REDD+ design/implementation;
 - (ii) ERR rights clarification/agreements;
 - (iii) Benefit-sharing criteria, eligibility, and allocation decisions.

2. FPIC Implemented Where Required

- For each rights-affecting activity, FPIC dossiers are complete and meet minimum standards: culturally appropriate processes; local language materials; adequate

time; no coercion; verifiable consent documentation; and, where relevant, independent observer reports.

- Where consent was conditional, all community conditions were implemented and evidenced.

3. Inclusion & Resourcing

- Participation was inclusive (women, youth, vulnerable groups) with resourcing provided (translation, facilitation, travel). Stakeholders confirm they could influence outcomes (e.g., changes made to project design, ERR rights agreements, or benefit-sharing rules based on inputs).

4. Consistency with Disclosure & Remedies

- Information pertinent to participation was disclosed timely and accessibly (Theme 2.1).
- Participation/FPIC grievances (Theme 2.4) were handled promptly and fairly, with remedies that affected parties consider legitimate; no retaliation is evident.

5. Adaptive Management

- If new activities arose or scope changed, FPIC was re-triggered where applicable; processes evolved with community feedback and lessons learned.

Evidence may include: FPIC/consultation files; signed consents/resolutions; observer/mediator notes; translated materials; change logs showing how inputs altered decisions; grievance logs and remedies; stakeholder interviews across genders/age groups.

Findings (See Safeguard Guidance (Annex I), Section 3.6.3.4)

Major Non-Conformance (any one triggers major):

- A rights-affecting activity proceeded without FPIC, or FPIC was invalid (coercion, misinformation, inadequate time, improper representation, or absence of verifiable documentation).
- Systematic bypass of IPs & LCs' chosen representative institutions or culturally inappropriate engagement that undermined decision-making.
- Participation was absent or purely tokenistic in ERR rights clarification (3.4.1) or benefit-sharing (3.4.2) development/implementation.
- Credible participation/FPIC grievances unresolved, or evidence of retaliation against complainants/representatives.

Minor Non-Conformance (all must hold):

- Participation and FPIC occurred substantively and no rights were harmed, but documentation/procedural gaps exist (e.g., incomplete minutes, late translations, minor delays) without prejudice to consent validity.
- Some inclusivity shortfalls (e.g., under-representation of women/youth) with corrective measures underway and no material impact on decisions.
- Minor alignment issues between consultation records and decision outputs that are being corrected (e.g., improved traceability of "how inputs were used").

Corrective Action for Minor: Close documentation gaps; reinforce inclusivity/translation; regularize archiving; clarify decision trails; complete any delayed formalization (e.g., filing of signed consents). Repeat or uncorrected minor issues escalate to major.

Proposed Amendments to the TREES Templates Theme 4.2

1. TREES Registration Document (TRD) Template

Section 7 – Safeguards

Under the structure and process indicator (see amendments on box above) for Theme 4.2 please add:

The Participant shall:

- **Describe the legal and institutional framework for the participation of Indigenous Peoples, Local Communities, Afro-descendant Peoples, or equivalent groups in REDD+ decision-making, including reference to customary laws and representative institutions;**
- **Explain procedures ensuring that participation occurs through communities' own decision-making structures and with culturally appropriate processes (e.g., use of local languages, traditional assemblies, customary protocols);**
- **Confirm that FPIC will be obtained for any REDD+ activity that may affect IPs & LCs' rights, lands, territories, resources, traditional livelihoods, or cultural heritage, including:**
 - **(i) REDD+ activity design and implementation;**
 - **(ii) clarification of ERR rights (Section 3.4.1); and**
 - **(iii) development and implementation of benefit-sharing arrangements (Section 3.4.2);**
- **Outline FPIC procedures and minimum standards, including timelines, documentation methods (signed agreements, resolutions, attestations), and use of independent observers where applicable;**
- **Identify responsible institutions and resources allocated to support participation (e.g., translation services, facilitation, travel support);**
- **Describe linkages to information disclosure (Theme 2.1) and grievance redress (Theme 2.4).**

Instructions to Participants: Attach FPIC protocols, community consultation frameworks, TORs for participatory bodies, and draft documentation templates. Provide evidence of engagement with representative organizations in developing these procedures.

For outcome indicator- see recommendations in section 12.3

2. TREES Monitoring Report (TMR) Template

Section 7- Safeguards

Under the outcome indicator (see amendments on box above) for Theme 4.2 please add:

For the reporting period, the Participant shall:

- **Confirm that Indigenous Peoples, Local Communities, Afro-descendant Peoples, or equivalent participated through their chosen institutions and customary processes in REDD+ activities, ERR rights clarification, and benefit-sharing arrangements;**
- **Provide evidence of FPIC obtained for any rights-affecting activities, including documentation such as agreements, resolutions, attestations, observer reports, and evidence of culturally appropriate processes (local language materials, adequate deliberation time, absence of coercion);**
- **Summarize conditions set by communities as part of FPIC and report on how these conditions were implemented;**

- Report on inclusivity, describing how women, youth, and vulnerable groups were involved in community-level decision-making processes;
- Summarize grievances or disputes raised in relation to participation or FPIC (cross-reference Theme 2.4) and how they were resolved;
- Describe adaptive measures taken to strengthen culturally appropriate participation and FPIC processes based on stakeholder feedback.

Instructions to Participants: Attach FPIC dossiers, consultation minutes, signed agreements, and independent observer reports where available. Provide disaggregated reporting by community and group to demonstrate inclusivity and compliance with FPIC standards.

Theme 5.1 – Non-conversion of natural forests and other natural ecosystems.

Rationale

Theme 5.1 addresses the core environmental safeguard under Cancún Safeguard E: REDD+ must not lead to the conversion of natural forests and ecosystems. The current TREES 3.0 language is already strong, but an editorial adjustment is needed to **remove any ambiguity about causality**.

By requiring that REDD+ activities “**did not cause any conversion of natural forests or other natural ecosystems**”, the safeguard is framed as an **absolute zero-conversion requirement**. This ensures that REDD+ cannot be used directly or indirectly to replace natural forests with plantations, agriculture, or other land uses. It also provides clarity to Participants and VVBs that even partial or indirect conversion (e.g., through enabling policies or activities) is disallowed.

The proposed refinements:

- Aligns TREES with **international best practices**, such as the New York Declaration on Forests and the Convention on Biological Diversity’s no-net-loss targets.
- Ensures that REDD+ contributes to **forest conservation and biodiversity objectives** while avoiding perverse incentives for deforestation followed by replanting.
- Helps VVBs apply a **clear, binary test**: any evidence that REDD+ caused conversion of natural forests/ecosystems constitutes non-conformance.

The structure/process indicator remains largely sufficient, as it already requires definitions, mapping, and frameworks to prevent conversion. The main adjustment is to the outcome indicator for clarity and enforceability.

Proposed Amendment Section 12.4.1 TREES 3.0- Theme 5.1

Structure and Process Indicator (amended):

Participants have in place a legal framework, policies, or programs, as well as the necessary procedures and resources, to define the term “natural forests” and “other natural ecosystems” (**distinct from plantations**) ~~distinguishing them from plantations~~, map ~~the~~ **their** spatial distribution of natural forests and other natural ecosystems, and prevent REDD+ activities from resulting in ~~the~~ **any** conversion of natural forests or other natural ecosystems.

Outcome Indicator (amended):

Public institutions have designed and implemented REDD+ activities ~~without the~~ such that they did not cause any conversion of natural forests and other natural ecosystems to plantations or other land uses.

Proposed Amendment VVS for Section 12.4.1 TREES 3.0 Theme 5.1

Validation Scope

The VVB shall confirm that the Participant has:

1. Defined “natural forests” and “other natural ecosystems” in line with TREES requirement and guidance and clearly distinguished them from plantations or other land uses.
2. Mapped the spatial distribution of natural forests and ecosystems within the accounting area using reliable, up-to-date datasets (e.g., national forest inventories, satellite imagery, land-use maps).
3. Established legal, policy, or programmatic measures prohibiting conversion of natural forests/ecosystems in REDD+ activities.
4. Outlined procedures for preventing conversion, including land-use screening, environmental safeguards in project design, and oversight by responsible institutions.
5. Linked the express prohibition of conversion to safeguard reporting, agreements to transfer ERR rights and benefit-sharing arrangements (as applicable), ensuring stakeholders are aware of any limitations on resource use and can monitor this commitment.

Evidence may include: legal texts, policy documents, REDD+ strategy references, land-use maps, deforestation moratoria, environmental screening procedures, and institutional mandates.

Verification Scope

The VVB shall verify, during each monitoring period, that:

1. No conversion of natural forests or ecosystems occurred as a result of REDD+ activities. (Assessed via remote sensing analysis, land-use change data, and field inspections.)
2. All REDD+ activities were screened against land-use maps and safeguards to confirm they took place outside natural forests/ecosystems or involved only restoration/enrichment planting consistent with conservation goals.
3. No indirect conversion occurred through enabling policies, incentives, or activities (e.g., REDD+ funds used to expand plantations that displaced natural forests).
4. Stakeholder interviews confirm that REDD+ activities did not lead to loss of natural forests/ecosystems, directly or indirectly.
5. Grievance records (Theme 2.4) are checked for allegations of forest conversion; any such cases must be reviewed and resolved.
6. Consistency is demonstrated between monitoring data, safeguards reports, and national deforestation statistics.

Evidence may include: satellite imagery analyses, monitoring reports, field audit notes, grievance logs, land-use permits, environmental impact assessments, and stakeholder testimonies.

Findings (See Safeguard Guidance (Annex I), Section 3.6.3.4)

Major Non-Conformance:

- Evidence that REDD+ activities directly or indirectly caused conversion of natural forests or ecosystems into plantations or other land uses;
- Absence of clear definitions or maps of natural forests/ecosystems;

- Use of REDD+ finance or activities that facilitated or incentivized conversion.

Minor Non-Conformance:

- Definitions and maps exist but contain minor gaps (e.g., missing small ecosystems, outdated datasets) without evidence of conversion;
- Slight delays in updating land-use maps or disclosure of monitoring results, provided safeguards remained effective;
- Inconsistencies in reporting (e.g., discrepancies between SIS disclosure and monitoring reports) that do not indicate actual conversion.

Corrective Action for Minor: The Participant must update maps, correct reporting inconsistencies, or improve monitoring/disclosure by the next verification. Uncorrected or recurring minor issues escalate to major.

Proposed Amendments to the TREES Templates Theme 5.1

1. TREES Registration Document (TRD) Template

Section 7 – Safeguards

Under the structure and process indicator (see amendments on box above) for Theme 5.1 please add:

The Participant shall:

- Provide a clear definition of “natural forests” and “other natural ecosystems” consistent with TREES requirements, and distinguish them from plantations or other land uses;
- Map the spatial distribution of natural forests and ecosystems within the accounting area, using reliable and up-to-date datasets (e.g., forest inventories, satellite imagery, land-use maps);
- Describe legal and policy frameworks that prohibit conversion of natural forests and ecosystems, including relevant national laws, moratoria, or conservation decrees;
- Explain institutional responsibilities and procedures for preventing conversion (e.g., environmental screening, land-use zoning, safeguards checks before REDD+ activities);
- Describe monitoring and enforcement mechanisms, including how conversion risks will be detected, reported, and addressed.

Instructions to Participants: Attach supporting documents (e.g., maps, legal texts, monitoring protocols). Clearly explain how safeguards ensure that no REDD+ activity results in conversion of natural forests or ecosystems.

For outcome indicator- see recommendations in section 12.3

2. TREES Monitoring Report (TMR) Template

Section 7- Safeguards

Under the outcome indicator (see amendments on box above) for Theme 5.1 please add:

For the reporting period, the Participant shall:

- **Confirm that no REDD+ activities caused conversion of natural forests or other natural ecosystems to plantations or other land uses;**
- **Provide monitoring evidence (e.g., satellite imagery, deforestation alerts, ground verification, environmental assessments) demonstrating that natural forests and ecosystems remain intact;**
- **Summarize activities implemented (e.g., restoration, enrichment planting, agroforestry) and explain how these complied with non-conversion requirements;**
- **Report on any grievances or allegations related to conversion (cross-reference Theme 2.4) and their resolution;**
- **Identify any challenges in monitoring/enforcement and measures taken to strengthen compliance;**
- **Disclose relevant data (e.g., deforestation statistics, monitoring results) through the Safeguard Information System (SIS) or equivalent platform.**

Instructions to Participants: Attach monitoring reports, maps, or independent verification results. Where possible, provide before/after satellite images and evidence of any corrective measures. Confirm that no REDD+ proceeds were used in activities leading to conversion.

Theme 5.2 – Protect natural forests and other natural ecosystems, biological diversity, and ecosystem services and enhance environmental benefits.

Rationale

Theme 5.2 under Cancún Safeguard E ensures that REDD+ actions both avoid harm and enhance environmental benefits. **While the existing TREES 3.0 text combines these requirements; it risks being interpreted as a single goal – suggesting that biodiversity loss could be offset by benefits elsewhere. This is inconsistent with safeguard best practice.**

The amendment clarifies that two separate and non-negotiable conditions must be met:

1. REDD+ activities must avoid any adverse impacts on natural forests, biodiversity, and ecosystem services;
2. REDD+ activities must also enhance environmental benefits, wherever possible.

This removes ambiguity, reinforces the “do no harm” principle, and prevents trade-offs that could justify biodiversity loss.

The changes also:

- **Replace “natural forest areas and natural ecosystems” with “natural forests and other natural ecosystems” for consistency with Theme 5.1;**
- **Align TREES with global frameworks** such as the CBD’s Aichi Targets and the Kunming-Montreal Global Biodiversity Framework, which emphasize both halting biodiversity loss and enhancing ecosystem services;
- **Encourage robust environmental and social impact assessments (ESIA/EIA) and monitoring of positive indicators (e.g., species richness, water regulation, pollination, soil health).**

For VVBs, this wording provides a clearer benchmark: REDD+ activities must show zero net harm and demonstrable enhancements to environmental values.

Proposed Amendment Section 12.4.1 TREES 3.0- Theme 5.2

Structure and Process Indicator (amended):

Participants have in place a legal framework, policies, or programs, as well as the necessary procedures and resources, to **ensure that REDD+ activities are designed and implemented** to avoid any adverse impacts on natural forests and other natural ecosystems, biodiversity, and ecosystem services ~~in the design and implementation of REDD+ activities and to enhance their environmental benefits, while also~~ **enhancing environmental benefits. This shall include conducting environmental assessments, adopting mitigation measures, and monitoring improvements in biodiversity and ecosystem services.**

Outcome Indicator (amended):

Public institutions have designed and implemented REDD+ activities ~~without~~ **in such a way that they did not cause any** adverse impacts on natural forests and **other** natural ecosystems, biodiversity, and ecosystem services, ~~and demonstrably enhancing~~ **enhanced environmental benefits. Evidence shall include monitoring data and case examples showing improvements in biodiversity and ecosystem service indicators.**

Proposed Amendment VVS for Section 12.4.1 TREES 3.0 Theme 5.2

Validation Scope

The VVB shall confirm that the Participant has:

1. **Defined procedures (legal/policy frameworks, program requirements) to ensure REDD+ activities avoid adverse impacts on natural forests, biodiversity, and ecosystem services, and to require enhancement of environmental benefits.**
2. **Demonstrated capacity (institutional roles, resources, technical procedures) to conduct environmental and social impact assessments (EIA/ESIA) or equivalent risk screenings for REDD+ activities.**
3. **Established monitoring systems to track both potential risks and expected environmental co-benefits (e.g., biodiversity indicators, ecosystem service metrics).**
4. **Outlined mitigation and enhancement measures, including avoidance of sensitive areas, protection of endangered species, ecosystem restoration activities, and co-benefit tracking frameworks.**
5. **Linked environmental protection and enhancement commitments to national biodiversity and climate frameworks (e.g., CBD targets, NBSAPs, national adaptation/mitigation plans).**

Evidence may include: REDD+ strategy sections; environmental safeguard frameworks; EIA regulations and reports; biodiversity or ecosystem monitoring plans; national biodiversity policy references.

Verification Scope

The VVB shall verify, during each monitoring period, that:

1. **No adverse impacts occurred on natural forests, biodiversity, or ecosystem services as a result of REDD+ activities. (Verified via monitoring reports, independent datasets (e.g., remote sensing, species surveys), site visits, and stakeholder interviews.)**
2. **Mitigation measures were applied where risks were identified in validation (e.g., protected species safeguards, activity redesign to avoid critical habitats).**

3. Environmental benefits were enhanced, demonstrated by quantitative or qualitative evidence (e.g., increased forest cover quality, improved habitat connectivity, species recovery, ecosystem service improvements such as water regulation or soil health).
4. Monitoring data and disclosure are consistent with reported outcomes (cross-check SIS reporting, safeguard reports, and monitoring results).
5. Stakeholder corroboration (communities, NGOs, local experts) supports claims that REDD+ implementation avoided environmental harm and produced net benefits.
6. Grievance records (Theme 2.4) were reviewed for allegations of adverse impacts; any such claims were investigated and remedied.

Evidence may include: biodiversity monitoring reports; ecosystem service studies; habitat maps; EIA/ESIA reports; field audit notes; grievance logs; independent observer/NGO reports.

Findings (Safeguard Guidance (Annex I), Section 3.6.3.4)

Major Non-Conformance:

- Evidence that REDD+ activities caused significant adverse impacts on natural forests, biodiversity, or ecosystem services (e.g., habitat destruction, species decline, water/soil degradation);
- Failure to implement required environmental assessments, mitigation measures, or monitoring systems;
- False or misleading reporting on environmental impacts/benefits.

Minor Non-Conformance:

- Mitigation and monitoring systems exist and no harm occurred, but documentation is incomplete (e.g., missing sections of biodiversity data, delayed publication of monitoring results);
- Environmental benefits were delivered but reporting is partial (e.g., enhancements achieved but not fully documented or disaggregated);
- Slight delays in implementing planned restoration/enhancement activities that are underway and do not risk net negative outcomes.

Corrective Action for Minor: The Participant must close documentation/reporting gaps, update monitoring/enhancement evidence, or implement delayed measures before the next verification. Recurring or uncorrected minor issues escalate to major.

Proposed Amendments to the TREES Templates Theme 5.2

1. TREES Registration Document (TRD) Template

Section 7 – Safeguards

Under the structure and process indicator (see amendments on box above) for Theme 5.2 please add:

The Participant shall:

- Describe the legal and institutional framework in place to prevent adverse impacts on natural forests, biodiversity, and ecosystem services during REDD+ design and implementation;
- Define procedures for environmental assessment, such as EIAs/ESIAs or safeguard screenings, to identify and mitigate potential risks prior to implementation;

- Identify planned environmental enhancement measures, including biodiversity conservation, restoration, and ecosystem service improvements, aligned with national and international commitments (e.g., CBD, national biodiversity strategies, NDCs);
- Describe monitoring systems that will be used to track environmental impacts and benefits (e.g., biodiversity indicators, ecosystem service metrics, habitat connectivity);
- Explain institutional responsibilities and resources allocated to implement, monitor, and enforce environmental safeguards and enhancement measures.

Instructions to Participants: Attach supporting documents (EIA guidelines, biodiversity or ecosystem monitoring plans, legal/policy references, and program-specific safeguards). Provide maps, baseline data, or indicators where available to demonstrate readiness to track outcomes.

For outcome indicator- see same approach as noted in TMR below.

2. TREES Monitoring Report (TMR) Template

Section 7- Safeguards

Under the outcome indicator (see amendments on box above) for Theme 5.2 please add:

For the reporting period, the Participant shall:

- Confirm that no REDD+ activities caused adverse impacts on natural forests, biodiversity, or ecosystem services;
- Provide evidence (monitoring data, EIA/ESIA results, biodiversity surveys, ecosystem service assessments, stakeholder feedback) demonstrating the absence of harm;
- Report on environmental enhancement outcomes, such as improvements in biodiversity indicators (species richness, habitat quality), ecosystem services (water regulation, soil fertility, pollination), or restoration activities (e.g., hectares restored, connectivity improved);
- Summarize mitigation measures applied to address identified risks and the effectiveness of those measures;
- Describe monitoring and disclosure practices, including how environmental outcomes were reported via the SIS;
- Report on any grievances related to environmental impacts (cross-reference Theme 2.4) and describe how they were addressed.

Instructions to Participants: Provide both qualitative and quantitative evidence. Attach maps, monitoring reports, case studies, or independent verification data. Where possible, provide disaggregated results by ecosystem type or geographic area.

Theme 5.3 – Enhancement of Social Benefits

Rationale

Theme 5.3 of TREES 3.0 reflects Cancún Safeguard E’s requirement that REDD+ activities **enhance social and environmental benefits**. The current indicators require that women, youth, and vulnerable groups benefit

from REDD+ actions and the distribution of benefits, but they stop short of requiring **inclusivity and equity** in the design and implementation of benefit-sharing.

Field experience shows that benefits can concentrate among elites unless safeguards require that:

- **Benefits are distributed inclusively and equitably**, with deliberate attention to marginalized groups;
- **Social benefits are intentional outcomes**, such as poverty reduction, job creation, and improved land tenure security, not incidental byproducts;
- **ERR rights clarification (Section 3.4.1) and benefit-sharing arrangements (Section 3.4.2)** explicitly embed equity principles, since these are the processes where exclusion or inequity most often occur.

The amendments therefore:

- Strengthen the **Structure/Process indicator** to require frameworks and procedures that ensure benefits are **inclusive and equitable**, with explicit integration into ERR rights clarification and benefit-sharing arrangements;
- Revise the **Outcome indicator** to confirm that REDD+ implementation **demonstrably enhanced social benefits** in ways that are inclusive and equitable, with evidence that marginalized groups actually benefited.

This wording clarifies that REDD+ programs must not just “increase benefits,” but must **reduce inequalities, improve local well-being, and ensure vulnerable groups share fairly** in the benefits of climate finance, consistent with **SDG 5 (Gender Equality)** and **SDG 10 (Reduced Inequalities)**.

Proposed Amendment Section 12.4.1 TREES 3.0- Theme 5.3

Structure and Process Indicator (amended):

Participants have in place a legal framework, policies, or programs, as well as the necessary procedures and resources, to ~~enhance the social benefits of~~ **ensure that REDD+ activities and the distribution of REDD+ benefits enhance social benefits in an inclusive and equitable manner and ensure that women, youth and vulnerable groups can also benefit from the REDD+ activities and the distribution of REDD+ benefits.** ~~These arrangements shall guarantee that women, youth, and vulnerable groups benefit meaningfully from REDD+, and that social benefits such as poverty reduction, livelihood security, and empowerment are integrated as intentional outcomes. The framework shall explicitly apply to both the clarification of Emission Reductions and Removals (ERR) rights (Section 3.4.1) and the design and implementation of benefit-sharing arrangements (Section 3.4.2).~~

Outcome Indicator (amended)

Public institutions have designed and implemented ~~the REDD+ activities and the distribution of REDD+ benefits~~ benefit-sharing arrangements to enhance social benefits **in an inclusive and equitable manner, and ensure ensuring** that women, youth, and vulnerable groups also ~~benefit~~ **benefited** from the REDD+ activities, **the clarification of ERR rights (Section 3.4.1), and the distribution of REDD+ benefits (Section 3.4.2).** Evidence shall demonstrate that **social benefits were not only increased, but distributed fairly across stakeholder groups without reinforcing existing inequalities.**

Proposed Amendment VVS for Section 12.4.1 TREES 3.0 Theme 5.3

Validation Scope

The VVB shall confirm that the Participant has:

1. Identified social benefits expected from REDD+ activities, including poverty reduction, livelihood security, improved land tenure, empowerment of marginalized groups, or other locally relevant co-benefits.
2. Established a framework to ensure social benefits are enhanced in an inclusive and equitable manner, not limited to aggregate increases but also addressing distributional fairness.
3. Integrated inclusivity and equity principles into both:
 - ERR rights clarification (Section 3.4.1): showing how rights-holders (including IPs & LCs, women, and vulnerable groups) are recognized and included in decisions affecting carbon rights;
 - Benefit-sharing arrangements (Section 3.4.2): demonstrating transparent, fair allocation criteria with clear provisions for marginalized groups.
4. Defined monitoring systems and indicators for tracking delivery of social benefits (e.g., number and type of beneficiaries, gender/youth-disaggregated data, community-level outcomes).
5. Described institutional responsibilities and resources to implement and oversee social benefit enhancement.

Evidence may include: relevant terms of benefit-sharing plan and ERR rights agreements, social assessment reports, safeguard frameworks, monitoring indicators, stakeholder engagement plans.

Verification Scope

The VVB shall verify, during each monitoring period, that:

1. Social benefits were enhanced, demonstrated by monitoring data and stakeholder testimony.
2. Benefits were distributed inclusively and equitably, ensuring women, youth, vulnerable groups, and IPs & LCs received tangible benefits in practice.
3. ERR rights clarification (3.4.1) was conducted in a way that acknowledged and secured rights-holders' interests, particularly vulnerable groups.
4. Benefit-sharing arrangements (3.4.2) were implemented transparently and equitably, and allocations aligned with agreed principles and criteria.
5. Monitoring data are disaggregated (by group, gender, vulnerability, geography) to demonstrate inclusivity of benefits.
6. Stakeholder feedback confirms that benefits were meaningful, fair, and accessible to diverse groups, and not captured by elites.
7. Grievances related to benefits (Theme 2.4) were logged and addressed promptly, with remedies judged effective by complainants.

Evidence may include: benefit distribution reports, financial records, disaggregated monitoring data, ERR rights transfer agreements, stakeholder interviews, grievance logs, community case studies.

Findings (See Safeguard Guidance (Annex I), Section 3.6.3.4)

Major Non-Conformance:

- Evidence that benefits were distributed in a discriminatory or exclusionary manner (e.g., systematically excluding women, vulnerable groups, or IPs & LCs);

- ERR rights clarification or benefit-sharing arrangements implemented without inclusion of affected rights-holders (including women, youth and vulnerable groups);
- Elite capture or diversion of benefits, confirmed by financial records or stakeholder testimony;
- Failure to implement any monitoring of social benefits.

Minor Non-Conformance:

- Benefits were generally inclusive and equitable, but documentation is incomplete (e.g., missing disaggregated data or partial reporting of benefits);
- Some procedural gaps in ERR rights clarification or benefit-sharing consultations, without evidence of material exclusion and harm;
- Delays in delivering some benefits to target groups, provided corrective actions are in place and no evidence of harm.

Corrective Action for Minor: The Participant must provide missing documentation, strengthen monitoring and disaggregation, or ensure timely delivery of pending benefits by the next verification. Uncorrected or repeated minor issues escalate to major.

Proposed Amendments to the TREES Templates Theme 5.3

1. TREES Registration Document (TRD) Template

Section 7 – Safeguards

Under the structure and process indicator (see amendments on box above) for Theme 5.3 please add:

The Participant shall:

- Describe the legal and institutional framework for enhancing social benefits of REDD+ activities and benefit distribution;
- Identify expected social benefits (e.g., poverty reduction, livelihood security, land tenure strengthening, job creation, empowerment of women and youth, reduced inequalities);
- Explain how inclusivity and equity principles will be applied in both:
 - (i) the clarification of Emission Reductions and Removals (ERR) rights (Section 3.4.1), to ensure that all legitimate rights-holders, including women, youth, vulnerable groups, and IPs & LCs, are recognized and protected; and
 - (ii) the design and implementation of benefit-sharing arrangements (Section 3.4.2), to ensure fair and transparent allocation of benefits across stakeholder groups;
- Describe monitoring systems and indicators that will track delivery of social benefits, including disaggregation by gender, age, vulnerable status, and geography;
- Outline institutional responsibilities and resources for ensuring that social benefits are realized and distributed inclusively and equitably.

Instructions to Participants: Attach the benefit-sharing plan, ERR rights agreements (if applicable), social assessments, or equivalent documents. Clearly demonstrate how equity and inclusivity will be embedded in both ERR rights clarification and benefit-sharing arrangements.

For outcome indicator- see recommendations in section 12.3

2. TREES Monitoring Report (TMR) Template

Section 7- Safeguards

Under the outcome indicator (see amendments on box above) for Theme 5.3 please add:

- **Describe the legal and institutional framework for enhancing social benefits of REDD+ activities and benefit distribution;**
- **Identify expected social benefits (e.g., poverty reduction, livelihood security, land tenure strengthening, job creation, empowerment of women and youth, reduced inequalities);**
- **Explain how inclusivity and equity principles will be applied in both:**
 - **(i) the clarification of Emission Reductions and Removals (ERR) rights (Section 3.4.1), to ensure that all legitimate rights-holders, including women, youth, vulnerable groups, and IPs & LCs, are recognized and protected; and**
 - **(ii) the design and implementation of benefit-sharing arrangements (Section 3.4.2), to ensure fair and transparent allocation of benefits across stakeholder groups;**
- **Describe monitoring systems and indicators that will track delivery of social benefits, including disaggregation by gender, age, vulnerable status, and geography;**
- **Outline institutional responsibilities and resources for ensuring that social benefits are realized and distributed inclusively and equitably.**

Instructions to Participants: Attach the benefit-sharing plan, ERR rights agreements (if applicable), social assessments, or equivalent documents. Clearly demonstrate how equity and inclusivity will be embedded in both ERR rights clarification and benefit-sharing arrangements.

Theme 6.1 – The risk of reversals is integrated in the design, prioritization, implementation, and periodic assessments of REDD+ policies and measures

Rationale

Cancún Safeguard F requires that REDD+ activities **address the risk of reversals** (i.e., the risk that emission reductions or removals may not be permanent). TREES 3.0 currently notes that Safeguard F is covered elsewhere (in Section 7 on reversals), and therefore omits structure and outcome indicators under Section 12.

While Section 7 contains robust technical provisions (e.g., reversal buffer accounts, monitoring obligations, and reversal management plans), the **absence of explicit linkage in the safeguards section** risks creating the impression that Safeguard F is not addressed as part of the Cancun safeguard framework.

To close this gap, a short but explicit note should:

- Reaffirm that Safeguard F is fully integrated into TREES via **Section 7’s technical requirements**;
- Require Participants to **demonstrate, in their safeguards reporting, how reversal risks were identified, mitigated, and monitored**, in order to show consistency with Cancun Safeguard F;
- Clarify that adherence to Section 7 measures (buffer pools, legal arrangements, long-term forest management obligations) is the mechanism through which Safeguard F is “addressed and respected.”

This addition strengthens transparency and completeness of Section 12, ensuring **all Cancun safeguards are explicitly covered** in TREES safeguards reporting.

Proposed Amendment Section 12.4.1 TREES 3.0- Theme 6.1

Process Indicator (amended):

Public institutions have identified and integrated measures to address and monitor the risk of reversals in the design, prioritization, implementation, and periodic assessments of REDD+ activities, **including mitigation strategies, monitoring protocols, and actions for addressing any reversal events in accordance with Section 7 requirements.**

Proposed Amendment VVS for Section 12.4.1 TREES 3.0 Theme 6.1

Validation Scope

The VVB shall confirm that the Participant has:

1. Described the legal and institutional framework supporting permanence of emission reductions and removals, including relevant land-use, forest management, and climate policies.
2. Identified potential sources of reversal risk (e.g., fire, pests, illegal logging, policy changes, land-use conflicts, market shifts).
3. Outlined mitigation measures consistent with TREES Section 7, such as:
 - Reversal buffer contributions;
 - Long-term land-use/forest management commitments;
 - Fire and pest management systems;
 - Monitoring and enforcement mechanisms.
4. Defined monitoring protocols for assessing reversal risk and triggering corrective action.
5. Established institutional roles and resources for reversal monitoring and management.

Evidence may include: reversal risk assessments, reversal management plans, buffer pool documentation, fire/pest management plans, enforcement mandates, and monitoring protocols.

Verification Scope

The VVB shall verify, during each monitoring period, that:

1. Reversal risk measures were implemented as described at validation (e.g., fire control systems operational, buffer pool contributions made).
2. No unaddressed reversal events occurred; if reversals were detected, buffer pool adjustments and corrective actions were taken consistent with Section 7.
3. Reversal monitoring data (e.g., remote sensing, field inspections, fire/pest reports) were collected and disclosed transparently.
4. Institutional responsibilities were fulfilled, and reversal risk management was coordinated with relevant agencies.
5. Stakeholder feedback corroborates that reversal risk measures (e.g., fire brigades, enforcement) are functioning on the ground.
6. Evidence may include: monitoring reports, remote sensing data, buffer account statements, fire/pest control logs, stakeholder interviews, and grievance records.

Findings (See Safeguard Guidance (Annex I), Section 3.6.3.4)

- **Major Non-Conformance:**
 - Failure to establish or implement reversal risk measures;
 - Significant reversal event occurred without corrective action or buffer pool adjustment;
 - No monitoring or disclosure of reversal risks;
 - Evidence of systemic governance gaps that compromise permanence.
- **Minor Non-Conformance:**
 - Reversal risk measures in place, but documentation incomplete (e.g., missing detail in monitoring reports);
 - Small delays in updating reversal risk assessments or buffer pool contributions, without evidence of unmitigated reversals;
 - Procedural shortcomings in coordination or disclosure that did not materially affect permanence.

Corrective Action for Minor: The Participant must close documentation gaps, update monitoring/reporting, or adjust systems before the next verification. Uncorrected or repeated minor issues escalate to major.

Proposed Amendments to the TREES Templates Theme 6.1

1. TREES Registration Document (TRD) Template

Section 7 – Safeguards

Under the process indicator (see amendments on box above) for Theme 6.1 please add:

The Participant shall:

- Identify main sources of reversal risk in the accounting area (e.g., fire, pests, illegal logging, land-use change, governance risks);
- Describe legal and institutional frameworks that ensure permanence of emission reductions and removals;
- Provide a reversal management plan consistent with Section 7, including monitoring protocols, mitigation strategies, and corrective action procedures;
- Explain contributions to the buffer pool and other safeguards against non-permanence;
- Describe institutional roles, budgets, and resources allocated to manage reversal risks;
- Attach supporting evidence such as risk assessments, forest/fire management strategies, or reversal monitoring frameworks.

Instructions to Participants: Please attach reversal risk analyses, buffer pool documentation, and monitoring protocols. Clearly describe how reversal measures align with Section 7 and demonstrate consistency with Cancún Safeguard F.

2. TREES Monitoring Report (TMR) Template

Section 7- Safeguards

For the reporting period, the Participant shall:

- **Confirm implementation of reversal risk management measures (e.g., fire prevention, pest control, enforcement of land-use rules);**
- **Provide evidence of buffer pool contributions and adjustments;**
- **Report any reversal events (type, scale, location) and describe corrective actions taken, including buffer pool deductions or remedial measures;**
- **Summarize monitoring results (e.g., fire incidence, deforestation alerts, ecosystem health indicators) and disclose through the SIS;**
- **Describe stakeholder involvement in reversal risk management (e.g., local fire brigades, community monitoring);**
- **Summarize grievances or concerns related to reversals (cross-reference Theme 2.4) and how they were addressed.**

Instructions to Participants: Attach monitoring reports, reversal event records, buffer pool account statements, and evidence of corrective actions. Provide maps or satellite imagery where relevant.

Theme 7.1 – The risk of displacement of emissions is integrated in the design, prioritization, implementation, and periodic assessments of REDD+ policies and measures.

Rationale

Cancún Safeguard G requires that REDD+ activities address the risk of displacement of emissions (often referred to as “leakage”). TREES 3.0 notes that no specific indicators appear under Section 12 because leakage is addressed in other technical sections (notably Section 7 on displacement).

However, leaving only that statement risks giving the impression that Safeguard G is not explicitly covered in safeguards reporting. To avoid this, a clarifying note should:

- **Reaffirm that Safeguard G is fully integrated into TREES via Section 7’s requirements on monitoring, managing, and minimizing leakage;**
- **Require Participants to demonstrate in safeguards reporting how they have applied measures to address displacement risks (e.g., leakage monitoring, regional coordination, policy measures to avoid activity-shifting);**
- **Reference relevant UNFCCC guidance (e.g., Warsaw Framework, Decision 17/CP.21) that results-based payments require addressing displacement;**
- **Encourage continuous strengthening of displacement measures over time.**

This makes clear that all Cancun safeguards (A–G) are addressed and respected within TREES 3.0, with Safeguard G operationalized through technical rules but still requiring safeguards reporting.

Proposed Amendment Section 12.4.1 TREES 3.0- Theme 7.1

Process Indicator (amended):

Public institutions have identified and integrated measures to address and monitor the risk of displacement of emissions in the design, prioritization, implementation, and periodic assessments of REDD+ activities, **including measures to strengthen national and subnational policy alignment, reduce activity-shifting, and improve land-use governance, in accordance with Section 7 of TREES.**

Proposed Amendment VVS for Section 12.4.1 TREES 3.0 Theme 7.1

Validation Scope

The VVB shall confirm that the Participant has:

1. Identified potential sources of displacement (e.g., shifting of deforestation or degradation to other areas, agricultural expansion, illegal logging displaced to neighbouring jurisdictions).
2. Established legal/policy frameworks and programs to prevent and minimize leakage, consistent with Section 7 of TREES and relevant UNFCCC guidance.
3. Outlined monitoring systems for detecting displacement, including use of remote sensing, land-use data, and cross-jurisdictional monitoring.
4. Defined mitigation strategies (e.g., landscape-level planning, coordination with subnational jurisdictions, sustainable livelihood programs to reduce activity-shifting).
5. Designated institutional responsibilities and resources for ongoing leakage monitoring and response.

Evidence may include: leakage risk assessments, monitoring protocols, policy frameworks, interagency agreements, or national/subnational coordination strategies.

Verification Scope

The VVB shall verify, during each monitoring period, that:

1. Identified potential sources of displacement (e.g., shifting of deforestation or degradation to other areas, agricultural expansion, illegal logging displaced to neighbouring jurisdictions).
2. Established legal/policy frameworks and programs to prevent and minimize leakage, consistent with Section 7 of TREES and relevant UNFCCC guidance.
3. Outlined monitoring systems for detecting displacement, including use of remote sensing, land-use data, and cross-jurisdictional monitoring.
4. Defined mitigation strategies (e.g., landscape-level planning, coordination with subnational jurisdictions, sustainable livelihood programs to reduce activity-shifting).
5. Designated institutional responsibilities and resources for ongoing leakage monitoring and response.

Evidence may include: leakage risk assessments, monitoring protocols, policy frameworks, interagency agreements, or national/subnational coordination strategies.

Findings (Safeguard Guidance (Annex I), Section 3.6.3.4)

Major Non-Conformance:

- No monitoring of displacement risks;
- Evidence of significant leakage attributable to REDD+ activities, without corrective action;
- Absence of legal/policy frameworks or institutional capacity to address leakage;
- Systematic under-reporting or misrepresentation of leakage impacts.

Minor Non-Conformance:

- Monitoring in place, no major leakage occurred, but documentation incomplete (e.g., missing maps, delayed disclosure);
- Small-scale leakage observed but corrective measures applied promptly and effectively;
- Minor inconsistencies between monitoring data and safeguards reporting, not material to overall outcomes.

Corrective Action for Minor: Participant must update leakage documentation, close data/reporting gaps, or demonstrate mitigation of minor leakage before the next verification. Uncorrected or repeated minor issues escalate to major.

Proposed Amendments to the TREES Templates Theme 7.1

1. TREES Registration Document (TRD) Template

Section 7 – Safeguards

Under the process indicator (see amendments on box above) for Theme 7.1 please add:

The Participant shall:

- Identify potential sources of emissions displacement within and beyond the accounting area;
- Describe legal and policy frameworks to prevent and minimize displacement risks, referencing Section 7 of TREES;
- Provide a leakage monitoring plan, including methods, frequency, and indicators to detect displacement;
- Outline mitigation strategies, including policy measures, livelihood programs, or subnational/national coordination mechanisms;
- Describe institutional roles and resources allocated to manage displacement risks;
- Attach supporting evidence (risk assessments, monitoring protocols, inter-ministerial or cross-jurisdictional agreements).

Instructions to Participants: Attach leakage risk assessments, monitoring and mitigation plans, and evidence of coordination with relevant agencies or subnational governments. Clearly explain how displacement risks will be monitored and minimized.

2. TREES Monitoring Report (TMR) Template

Section 7- Safeguards

For the reporting period, the Participant shall:

- Confirm that displacement risk monitoring was implemented, and report results (e.g., deforestation alerts outside program areas, land-use change trends);
- Provide evidence of monitoring data and analysis (maps, spatial data, leakage assessments);
- Report on any leakage events detected, their causes, and corrective actions taken;
- Summarize policy or program measures strengthened to prevent future leakage (e.g., livelihood programs, coordination with agriculture/forestry agencies);

- Describe stakeholder feedback or grievances related to leakage (cross-reference Theme 2.4) and how these were addressed;
- Confirm disclosure of leakage monitoring results through the SIS or equivalent platform.

Instructions to Participants: Provide quantitative and qualitative evidence, including monitoring datasets, spatial analyses, corrective action reports, and stakeholder engagement outcomes. Include before/after maps or time-series data where possible.

Dedicated guidance for TREES Section 12

Section 12 of the ART TREES 3.0 Standard addresses environmental social and governance **safeguards**, a critical pillar of credible REDD+ programs. To ensure these safeguards are effectively implemented, we recommend that ART **formally adopt and mandate a 2025 Safeguard Implementation Guidance** as a required companion document.

This guidance would function as a **Safeguards Implementation Manual**, providing detailed, practical instructions for meeting Section 12 requirements.

By making this guidance an official part of the TREES framework, ART would ensure that all Participant jurisdictions follow the same roadmap for addressing and respecting the Cancún safeguards under TREES. Formal adoption would demonstrate that safeguard implementation is not optional or secondary, but integral to TREES – on par with carbon accounting.

The annexed *Safeguard Implementation Guidance for ART TREES 3.0* (“Safeguard Guidance”)¹ provides a strong basis to work with stakeholders to elaborate such guidance for adoption and application by ART. The proposed guidance would be organized around the seven Cancún safeguard themes (A–G), it would:

- Clarify the objectives of each safeguard;
- Set benchmarks and expectations for structure/process and outcome indicators;
- Provide examples of implementation measures and documentation; and
- Integrate international best practice (e.g., IFC Performance Standards, UNDP SES).

The primary benefit of formal guidance is to jurisdictions themselves. Many governments and subnational entities struggle with how to operationalize broad safeguard principles in practice. A required guidance document would:

- **Provide a clear blueprint** for designing safeguard measures in line with international standards, but tailored to national and subnational contexts.
- **Support forward planning** by linking safeguards directly to the TREES program cycle. For example, in the TRD, jurisdictions must demonstrate conformance with structure/process indicators and define desired outcomes and monitoring plans for REDD+ actions in the crediting period. The annexed Safeguard Guidance is a robust starting point for development and adoption of a guidance document to be adopted by ART. A final guidance document can help Participants set realistic metrics and monitoring approaches at the outset, avoiding costly retrofits later.
- **Ensure safeguards are embedded from the start**, rather than treated as an afterthought. By prompting jurisdictions to define desired results and establish monitoring systems upfront, the guidance turns safeguards into an integral part of program design and execution.
- **Reduce uncertainty and transaction costs**, by clarifying what evidence is needed to demonstrate conformance. This allows jurisdictions to collect the right information at the right time, avoiding duplication of effort and unnecessary reporting burdens.
- **Enable stepwise compliance**, as TREES requires. Jurisdictions can show how they are addressing safeguards progressively – from design, to implementation, to monitoring – making validation and verification smoother and more predictable.

Formalizing the recommended guidance also enhances the credibility of jurisdictional REDD+ programs. By aligning safeguards with Cancún requirements and international standards, jurisdictions can demonstrate that

¹ The annexed “Safeguard Guidance” document was fully authored by the CL&P. Kawari Fund welcomes the opportunity to join other stakeholders in seeing it as a starting point to review, comment, and collaboratively draft such guidance which we agree should be adopted and approved by ART.

emission reductions are not only real and verifiable but also achieved with social and environmental integrity. This strengthens stakeholder confidence at multiple levels:

- Indigenous Peoples and Local Communities gain assurance that their rights and knowledge are respected.
- National stakeholders see consistency between REDD+ implementation and broader development and environmental commitments.
- International partners – including donor governments, NGOs, and market actors – have greater trust in the integrity of ART-issued credits.

Once adopted, we recommend ART commit to **periodic review and update** of the its finalized safeguard guidance. Lessons learned from implementation should be incorporated, and updates should be co-developed with Indigenous Peoples, Local Communities, civil society, women’s groups, and youth representatives. This inclusive process ensures the guidance remains practical, culturally appropriate, and legitimate in the eyes of those most directly affected by REDD+ actions.

II. Carbon Rights and Benefit Sharing

Context

A clear definition of carbon rights and fair benefit-sharing arrangements is fundamental to the social integrity of REDD+. Together, these provisions determine **who holds ownership of emission reductions and removals (ERRs)** – and therefore the credits – and **how the resulting financial benefits are distributed**, particularly to Indigenous Peoples, Local Communities, Afro-descendant Peoples, and other rights-holders who play a central role in conserving forests.

In addition to determining credit ownership and financial flows, clarity on carbon rights and benefit sharing reduces the risk of conflict, elite capture, and corruption, while strengthening both social legitimacy and market confidence. Without explicit recognition of customary rights and clear guidance on how statutory and customary tenure interact, there is a danger that communities who play a central role in forest stewardship will be excluded from benefits.

Clarity and fairness in these areas are essential to:

- Build trust among stakeholders;
- Secure meaningful participation in REDD+ programs; and
- Uphold the rights and interests of those most directly responsible for achieving and sustaining REDD+ outcomes.

TREES 3.0 introduces important provisions on carbon rights and benefit-sharing that are explicitly aligned with the UNFCCC Cancún Safeguards, including:

- **Safeguard C** – respect for land tenure and the rights of IPs & LCs;
- **Safeguard B** – transparent and effective governance;
- **Safeguard D** – full and effective stakeholder participation; and
- **Safeguard E** – enhancement of social and environmental benefits.

Additionally, as countries move toward jurisdictional crediting, many already host **nested REDD+ projects and IPLC-led carbon initiatives** within their accounting areas. Ensuring that these projects are **fairly and transparently integrated** into jurisdictional programs is critical to avoiding double counting and protecting the rights and interests of early actors. Clear protocols for nesting – covering both recognition of ERR rights (Section 3.4.1) and fair allocation of benefits (Section 3.4.2) – are therefore an essential part of strengthening TREES' treatment of carbon rights and benefit-sharing.

The objective of this section is to provide **recommendations for strengthening these two social integrity issues – carbon rights and benefit-sharing** – to ensure that TREES 3.0 achieves best practice and consistency with international norms. The analysis identifies **key gaps** in the current requirements and offers **specific recommendations for amendments** to:

- The TREES 3.0 standard text (Sections 3.4.1 and 3.4.2);
- The Validation and Verification Standard (VVS); and
- The Registration Document (TRD) and Monitoring Report (TMR) templates.

Together, these recommendations form a coherent package to reinforce social integrity in ART, ensuring that TREES credits are underpinned by **clear rights, equitable benefits, and robust verification**.

Section 3.4.1- Carbon Rights

Section 3.4.1 of TREES requires Participants to demonstrate their rights to emission reductions and removals (ERRs) before credit issuance. This section is central to the social integrity of ART, since carbon rights determine **who owns the credits** and who must share in the resulting benefits.

While the TREES 3.0 draft provides a strong baseline, gaps remain:

- It does not specify what counts as **acceptable evidence** of carbon rights;
- It does not require a **comprehensive tenure assessment** (statutory + customary);
- It does not explicitly state that **FPIC applies where IP and LC rights are affected**;
- It does not explicitly mandate **public disclosure of ERR rights agreements**;
- It does not expressly address how **unresolved disputes** affect eligibility for credit issuance;
- It does not codify protection of **beneficial interests** where the State holds legal title.

Without these clarifications, application may be inconsistent across jurisdictions, and VVBs may lack a consistent verification benchmark.

Strengthening Section 3.4.1 with clearer requirements – including explicit recognition of statutory and customary rights, FPIC, acceptable forms of evidence, tenure mapping, dispute resolution, and beneficial interest clauses – will:

- **Provide clarity** for Participants;
- Ensure VVBs **apply uniform standards**;
- **Protect the rights** of IPs & LCs and other stakeholders;
- **Build market confidence** that ART credits are legally and ethically sound.

Proposed Amendment Section 3.4.1

Amended paragraph 1

~~Before~~ **Prior** to the issuance of credits, the Participant shall ~~provide a demonstration of~~ **demonstrate** its **legal rights to the all** ERRs generated ~~from within~~ the TREES accounting area. **This demonstration shall be based on existing constitutional, statutory, regulatory, customary, or contractual provisions, and shall include evidence that both statutory and customary tenure rights have been recognized and addressed.** ~~frameworks, laws or administrative orders.~~ **The Participant shall provide verifiable documentation of all such rights, identify all legal and customary rights-holders, and explain how any overlapping or contested claims have been resolved in accordance with Cancún Safeguards and Section 12 of TREES.** ~~This explanation shall include how such carbon rights and/or intangible property interests are established, the legal basis for creating such rights and interests, and how claims to such rights from private parties, Indigenous Peoples, Local Communities, Afro-descendant Peoples, other stakeholders or subnational entities will be resolved (consistent with applicable UNFCCC Cancun Safeguards and Section 12).~~

Nesting (new clause)

Where nested REDD+ projects or IPLC/ community initiatives exist within the accounting area, the Participant shall demonstrate how their ERR rights are recognized and integrated into the jurisdictional framework in accordance with TREES safeguards, including FPIC, to prevent double counting and ensure fair treatment of rightsholders.

~~It may not be necessary for the Participant to establish or enact new legislation or a legal framework to address carbon rights. However, the Participant must explain how under existing legal and policy frameworks carbon rights and/or related intangible property interests are established and addressed are~~ **recognized under existing legal and policy frameworks and consistent with Applicable Law, and the legal basis for their creation and enforcement.**

Acceptable Evidence (new sub-clause)

Acceptable evidence of ERR rights may include:

- Statutory provisions or regulations explicitly addressing carbon rights;
- Court rulings or legal opinions confirming ownership or title;
- Official land title or registry records;
- Formal agreements or Memoranda of Understanding (MOUs) with IPs & LCs, private landowners, or project proponents;
- Records of customary tenure mapping;
- Recognition by competent authorities;
- Evidence of dispute resolution outcomes for overlapping claims.

Tenure Mapping (new clause)

The Participant shall conduct and provide a comprehensive assessment of land and carbon tenure within the accounting area, identifying all statutory and customary owners, land/resource users, and indigenous territories. The results of this assessment, including maps and a list of all recognized and potential rightsholders, shall be shared with affected stakeholders, validated by them, and made publicly available.

When other ERR right-holders are present in the accounting area, the Participant shall describe and provide evidence of agreements concluded prior to credit issuance for the transfer of ERR rights between them and the Participant. **Such agreements shall be reached in conformance with TREES safeguards, including FPIC where applicable, and described in the TREES Registration Document and Monitoring Reports.** ~~The Participant shall demonstrate that the agreements were reached in conformance with TREES safeguards and describe this in the relevant sections of their TREES Registration Document and TREES Monitoring Reports.~~

FPIC Clause (new clause + clarification)

Where the transfer of ERR rights involves Indigenous Peoples, Local Communities, Afro-descendant Peoples, or equivalent stakeholders, FPIC shall be obtained and documented in accordance with Section 12 safeguards.

Public Disclosure (new clause)

The Participant shall define and disclose a full copy of the ERR rights agreements in the TREES Registration Document. The transfer of ERR rights agreements shall be considered a TREES document under subsection 2.4 and published by ART. The complete ERR rights agreements, and a publicly accessible summary in appropriate languages and formats, shall be made available on the Participant's official REDD+ information platform or equivalent website (including any conditions or terms related to impacts and limitations on ownership, use, access and control (i.e. limits to grazing practices, subsistence activities with forest resources)).

Beneficial Interests (new clause)

Where legal title to ERRs rests with the government, the Participant shall demonstrate that the beneficial interests of IPs & LCs and other rightsholders are acknowledged and secured through benefit-sharing measures or agreements consistent with Section 3.4.2.

Participants may provide demonstration of rights to the ERRs during verification or at a later date, within the same crediting period or during the following crediting period. **However**, TREES credits will only be issued for the number of ERRs for which the Validation and Verification Body has verified that the Participant can demonstrate rights **regardless of how the credits will be used.**

Proposed Amendment Definitions- linked to section 3.4.1

Glossary Definition (new)

ERR rights (carbon rights): The legal or customary entitlement to claim ownership of, and/or receive benefits from, quantified emission reductions or removals generated within a defined area. This includes both the ownership of such reductions/removals and the beneficial interest in their use, transfer, or monetization.

Proposed Amendment VVS for Section 3.4.1

Validation Scope

The VVB shall confirm that the Participant has:

1. Identified and documented statutory and customary tenure systems relevant to ERRs;
2. Provided acceptable evidence of rights (see list above in amendments to section 3.4.1);
3. Conducted a comprehensive tenure assessment, validated with stakeholders and disclosed publicly;
4. Described how overlapping or contested claims were resolved in line with safeguards;
5. Applied FPIC procedures where IPs & LCs or equivalent stakeholders are rightsholders;
6. Provided agreements with other ERR rightsholders consistent with safeguards;
7. Publicly disclosed the full ERR rights agreements and an accessible summary (including any conditions or terms related to impacts and limitations on ownership, use, access and control (i.e. limits to grazing practices, subsistence activities with forest resources));
8. Demonstrated that beneficial interests are secured through Section 3.4.2 arrangements;
9. The VVB shall confirm whether any nested projects or IPLC/community initiatives exist within the accounting area. Where such projects/initiatives are present, the VVB shall verify that ERR rights agreements exist, reached in conformance with TREES safeguards (including FPIC where applicable), and that these agreements prevent double counting of ERRs.

Verification Scope

The VVB shall verify, during each monitoring period, that:

1. Rights claimed by the Participant remain valid and uncontested;
2. Tenure assessment results are updated and disclosed if there are changes;
3. Agreements with rightsholders are honoured and FPIC evidence is available;
4. Benefit-sharing commitments linked to ERR rights transfers are implemented;
5. No credits are issued for ERRs where claims remain unresolved or disputed;
6. The VVB shall verify that agreements with nested projects/IPs & LCs remain valid and implemented, and that ERRs from these initiatives were properly accounted for in jurisdictional results.

Findings (See Safeguard Guidance (Annex I), Section 3.6.3.4)

Major Non-Conformance (any one of these is sufficient):

- Failure to demonstrate legal rights to ERRs prior to credit issuance;
- No comprehensive tenure assessment conducted or evidence that significant statutory/customary rights-holders were omitted;
- Unresolved overlapping or contested claims that materially affect ownership of ERRs;

- FPIC not obtained where required for ERR rights transfer agreements with IPs & LCs or other rightsholders;
- Agreements with ERR rightsholders absent or not reached in conformance with safeguards;
- Evidence of misrepresentation of rights or fraudulent claims to ERRs;
- Evidence that nested projects/IPLC initiatives were integrated without FPIC, or excluded from ERR rights/benefit-sharing agreements;
- Evidence of double counting of ERRs between jurisdiction and project level.

Minor Non-Conformance (all must hold):

- ERR rights are broadly demonstrated and uncontested, but documentation incomplete (e.g., missing registry citations, limited detail on customary recognition);
- Minor mapping or tenure assessment gaps that do not affect overall validity;
- Slight delays in public disclosure of tenure assessments or agreements, without evidence of harm;
- Procedural shortcomings in validation of tenure information with stakeholders, but corrective action is underway.

Corrective Action for Minor: Documentation gaps or disclosure delays must be resolved by the next verification. Repeated or uncorrected issues escalate to major.

Proposed Amendments to the TREES Templates Section 3.4.1

1. TREES Registration Document (TRD) Template

Section 6- ERR Rights Demonstration

The Participant shall:

- Describe the legal basis for ERR rights under constitutional, statutory, customary, or contractual provisions;
- Provide acceptable evidence of ERR rights;
- Attach a comprehensive tenure assessment and maps of statutory and customary rightsholders;
- Describe how overlapping claims were resolved, with supporting documentation;
- Provide agreements with other ERR rightsholders, including FPIC evidence where applicable;
- Describe how beneficial interests of IPs & LCs and rightsholders are secured through benefit-sharing arrangements (cross-reference Section 3.4.2);
- Identify any nested projects or IPLC/community initiatives in the accounting area and describe how their ERR rights are recognized, transferred, or integrated, including evidence of FPIC where applicable.

2. TREES Monitoring Report (TMR) Template

Section 6- ERR Rights Implementation

For the reporting period, the Participant shall:

- Confirm that ERR rights remain valid and uncontested;
- Report any changes in statutory or customary tenure, including updates to maps and stakeholder validation;
- Provide evidence of agreements with ERR rightsholders and confirm that FPIC commitments were upheld;

- Describe the processes used to develop and approve the ERR agreements, including how participation and FPIC were ensured;
- Attach or reference the full ERR agreements (considered a TREES document under Section 2.4) and a publicly accessible summary in appropriate languages and formats;
- Explain disclosure arrangements (e.g., SIS platform, government REDD+ website) to ensure public access;
- Summarize any disputes raised, how they were resolved, and whether corrective actions were required;
- Report on benefit-sharing outcomes linked to ERR rights transfers;
- Confirm the continued validity and implementation of agreements with nested projects/IPs & LCs. Report any disputes raised and how they were resolved.

Section 3.4.2- Benefit Sharing

Rationale

Section 3.4.2 of TREES requires Participants to describe their benefit-sharing arrangements. This provision is foundational for the **social legitimacy and integrity** of ART, since benefit-sharing determines how carbon finance is distributed and whether IPs & LCs, and other stakeholders are equitably rewarded for their role in protecting forests.

The current TREES text, however, has several **gaps**:

- It requires an **ex-ante description** of benefit-sharing arrangements, but not systematic monitoring of actual disbursements.
- It does not explicitly mandate **public disclosure** of benefit-sharing plans or implementation results.
- It does not codify **equity principles** (e.g., proportionality to contributions, prioritization of IPs & LCs, gender inclusion, protection against elite capture).
- It lacks explicit requirements for integrating **nested projects** or IPLC-led initiatives into jurisdictional arrangements.

Without stronger requirements, there is a risk of:

- **Elite capture or mismanagement** of carbon revenues;
- **Exclusion** of IPs & LCs, women, youth, or vulnerable groups;
- **Reduced buyer confidence** in whether climate finance is reaching the ground.

Strengthening Section 3.4.2 to include transparency, monitoring, and equity safeguards will:

- Ensure REDD+ benefits are not only promised but **proven and verified**;
- Provide VVBs with clear benchmarks to audit benefit-sharing;
- Reinforce market trust in TREES credits as high-integrity, rights-respecting assets.

Proposed Amendment Section 3.4.2

The Participant shall provide a description of the benefit sharing arrangements that govern the distribution of proceeds and benefits derived from TREES Credits. This description shall **be provided in the TREES Registration Document** and include:

- The stakeholder groups eligible to receive benefits, including, where applicable, Indigenous Peoples, Local Communities, Afro-descendant Peoples, and other rights holders;
- The principles and criteria guiding how benefits are allocated, **which must give due consideration to: (a) the relative contributions of stakeholders to emission reductions and removals; (b) pre-existing statutory and customary rights, particularly those of IPs & LCs;**

and (c) the equitable inclusion of women, youth, and vulnerable or marginalized groups in both decision-making and benefit receipt;

- The processes used to develop and implement the benefit sharing arrangements, **ensuring full and effective participation and FPIC where applicable; and**
- The BSP shall also specify how nested projects and IPLC/community initiatives are incorporated into the jurisdictional benefit-sharing framework, ensuring that these actors receive a share of benefits equivalent to, or greater than, what they would have obtained absent integration.

Public Disclosure (new clause)

The Participant shall define and disclose a full copy of the BSP in the TREES Registration Document. The BSP shall be considered a TREES document under subsection 2.4 and published by ART. The complete BSP, and a publicly accessible summary in appropriate languages and formats, shall be made available on the Participant's official REDD+ information platform or equivalent website (including any conditions or terms related limitations on ownership, use, access and control (i.e. limits to grazing practices, subsistence activities with forest resources) in exchange for benefits received) .

~~In addition to describing the arrangements, the Participant shall demonstrate how the process used to develop and implement benefit sharing arrangements is consistent with TREES safeguards and report on this in the safeguard sections of the TREES Registration Document and~~

In each TREES Monitoring Report, the Participant shall report on the dedicated section on Benefit Sharing Implementation, detailing particularly:

- ~~• Safeguard B (transparent and effective governance);~~
- ~~• Safeguard C (respect for the knowledge and rights of Indigenous Peoples and Local Communities);~~
- ~~• Safeguard D (full and effective participation of relevant stakeholders); and~~
- ~~• Safeguard E (protection and conservation of natural forests and their ecosystem services, and enhancement of other social and environmental benefits)~~
- **Total revenues generated from TREES credits during the reporting period;**
- **The terms of transactions with credit purchasers and amounts received;**
- **Expenses deducted prior to distribution;**
- **The amounts and/or percentages of revenues allocated to each beneficiary category (e.g., IPs & LCs, local governments, landowners, national administrative costs, forest management activities);**
- **A qualitative description of non-monetary benefits delivered;**
- **Examples of projects or activities funded to evidence impacts.**

This information shall be disaggregated by beneficiary type, gender, and geography to the extent possible and reported in formats accessible to stakeholders

Participants are encouraged to consider allocating a significant portion of TREES proceeds to IPs & LCs and other local stakeholders critical to REDD+ implementation, consistent with international commitments such as the Glasgow Leaders' Declaration on Forests and Land Use.

Proposed Amendment VVS for Section 3.4.2

Validation Scope

The VVB shall confirm that the Participant has:

1. Developed a BSP describing eligible groups, allocation principles, and implementation processes;
2. Demonstrated that the BSP was developed with full and effective stakeholder participation and FPIC where applicable;
3. Defined allocation criteria reflecting equity principles: contributions, rights, and inclusion of marginalized groups;
4. Publicly disclosed the full BSP and accessible summary (including any conditions or terms related limitations on ownership, use, access and control (i.e. limits to grazing practices, subsistence activities with forest resources) in exchange for benefits received);
5. The VVB shall confirm that the Benefit-Sharing Plan (BSP) specifies how nested projects and IPLC/community initiatives are treated, and that they are guaranteed an allocation of benefits equivalent to, or greater than, what they would have obtained absent integration.

Verification Scope

The VVB shall verify, during each monitoring period, that:

- BSP implementation occurred as described, with financial allocations disbursed as planned.
- Reported benefit distribution matches financial records and beneficiary testimony.
- Allocations reached IPs & LCs, women, youth, and vulnerable groups in line with the BSP.
- Non-monetary benefits (e.g., capacity building, tenure strengthening) were delivered.
- Monitoring data were disaggregated by geography, gender, and vulnerability.
- BSP results were publicly disclosed;
- The VVB shall verify, through financial records and beneficiary sampling, that nested projects/IPLC initiatives received the benefits specified in the BSP.

Findings (See Safeguard Guidance (Annex I), Section 3.6.3.4)

Major Non-Conformance (any one of these is sufficient):

- No Benefit-Sharing Plan (BSP) exists or BSP not disclosed as required;
- Systematic exclusion of IPs & LCs, women, youth, or vulnerable groups from benefit-sharing eligibility or decision-making;
- Misrepresentation or evidence of diversion/elite capture of benefits;
- Failure to report or disclose benefit-sharing implementation in the TMR;
- Financial records or beneficiary testimonies show that benefits were not delivered as reported;
- FPIC not obtained where required for agreements relating to ERR rights transfers into BSP arrangements;
- Evidence that nested projects/IPLC initiatives were integrated without FPIC, or excluded from ERR rights/benefit-sharing agreements.

Minor Non-Conformance (all must hold):

- BSP exists, disclosed, and implemented broadly in line with requirements;
- Benefits were delivered but reporting incomplete (e.g., disaggregation missing, delayed publication, partial accounting of revenues/expenses);
- Minor procedural issues (e.g., limited outreach on BSP publication, insufficient detail in non-monetary benefits reporting) but no evidence of inequity or diversion;
- Small delays in distribution that are being corrected and do not materially undermine stakeholder trust.

Corrective Action for Minor: Participant must update reporting, provide missing disaggregated data, or strengthen monitoring/disclosure before the next verification. Repeated or uncorrected minor issues escalate to major.

Proposed Amendments to the TREES Templates Section 3.4.2

1. TREES Registration Document (TRD) Template

New Section 7- BSP Demonstration

The Participant shall:

- Describe the BSP governing the distribution of proceeds and benefits derived from TREES credits;
- Identify eligible stakeholder groups, including Indigenous Peoples, Local Communities, Afro-descendant Peoples, women, youth, vulnerable groups, and other rights-holders;
- Set out allocation principles and criteria, giving due consideration to:
 - relative contributions to emission reductions/removals;
 - pre-existing statutory and customary rights, particularly those of IPs & LCs; and
 - equitable inclusion of women, youth, and vulnerable or marginalized groups in decision-making and benefit receipt;
- Describe the processes used to develop and approve the BSP, including how participation and FPIC were ensured;
- Attach or reference the full BSP (considered a TREES document under Section 2.4) and a publicly accessible summary in appropriate languages and formats;
- Explain disclosure arrangements (e.g., SIS platform, government REDD+ website) to ensure public access;
- Describe institutional responsibilities for implementing and monitoring the BSP, and mechanisms to update it as needed;
- Confirm linkages to grievance redress (Theme 2.4) for disputes relating to benefit-sharing;
- Explain how nested projects/IPLC initiatives are incorporated into the BSP, including allocation rules or agreements ensuring they are no worse off than under standalone crediting. Attach supporting documentation (agreements, MOUs, or decrees).

Instructions to Participants: Provide the BSP in full and attach a summary. Include supporting evidence of participatory development, FPIC (where applicable), and disclosure. Ensure that the BSP is consistent with Sections 3.4.1 and 12 (safeguards)

2. TREES Monitoring Report (TMR) Template

New Section 7- BSP Implementation

For the reporting period, the Participant shall:

- Report total revenues generated from TREES credits, including purchaser terms, amounts received, and expenses deducted prior to distribution;
- Provide a breakdown of allocations (amounts/percentages) by beneficiary category (e.g., IPs & LCs, local governments, landowners, women's groups, national administrative costs, forest management);
- Report on equity outcomes, showing disaggregation by geography, gender, youth, and vulnerable group status to the extent possible;
- Describe non-monetary benefits (capacity building, tenure strengthening, conservation support, livelihood initiatives) and provide case examples of their impacts;
- Summarize how IPs & LCs and other stakeholders were engaged in monitoring benefit-sharing implementation;
- Describe challenges and corrective measures taken to ensure inclusivity, equity, and transparency;
- Provide disclosure evidence (e.g., SIS links, public reports) showing BSP implementation was published in accessible languages and formats;

- **Summarize any grievances (cross-reference Theme 2.4) related to benefit-sharing and how they were resolved.**
- **Provide evidence of benefits allocated to nested projects/IPLC initiatives, including amounts/percentages and disaggregated reporting (by geography, group, etc.). Confirm these were received as agreed through beneficiary interviews or third-party attestations.**

Instructions to Participants: Attach financial statements, disaggregated benefit tables, case studies, and SIS disclosure screenshots. Provide both quantitative and qualitative evidence to demonstrate that benefits were delivered fairly, transparently, and inclusively.

III. Stakeholder Engagement and the Safeguard Information System (SIS)

Context

Under the UNFCCC, a **Safeguard Information System (SIS)** is one of the four pillars of REDD+. An SIS is essentially a domestic system for providing information on how the **Cancún safeguards** (the seven social and environmental safeguards agreed under UNFCCC) are being addressed and respected during REDD+ implementation. At COP17 in Durban, Parties agreed that an SIS should have certain key characteristics – it should be *country-driven, transparent, accessible to stakeholders, flexible to improve over time, comprehensive* (covering all safeguards), and *built upon existing systems*. In other words, the SIS is meant to ensure that REDD+ programs “do no harm” and promote benefits by upholding transparency, stakeholder participation, and other safeguard principles in practice.

Within **TREES** these SIS requirements are echoed as eligibility criteria. **TREES 3.0** requires Participants to have an SIS, but provides **no guidance** on what it means to have one “in place” or how VVBs should validate and verify it. Without clearer criteria, there is a risk of inconsistent application and uncertainty for both Participants and VVBs.

A strong SIS should:

- Be **transparent** (publicly available and updated regularly);
- Be **complete** (cover all Cancún safeguards, A–G);
- Ensure **stakeholder participation** (in design, review, and dissemination); and
- Be **linked to grievance mechanisms** (providing channels for feedback and accountability).

At the same time, **TREES** requires robust **stakeholder engagement** (Section 2.6), but this is framed mainly around ART Secretariat notifications and public comment. There is an opportunity to **leverage SIS as the main channel for domestic stakeholder engagement**, ensuring information flows both ways and that IPs & LCs and civil society are active participants in safeguards oversight.

Strengthening SIS and stakeholder engagement provisions in **TREES** will:

- Provide clarity and standardization for Participants and VVBs;
- Ensure compliance with UNFCCC expectations;
- Build trust among local and international stakeholders; and
- Reinforce ART’s position as a high-integrity REDD+ crediting standard

This section therefore presents recommendations for strengthening SIS and stakeholder engagement through targeted amendments to the **TREES 3.0** standard text (notably Sections 2.6 and 3.1.2), to the Validation and Verification Standard (VVS), and to the Registration Document (TRD) and Monitoring Report (TMR) templates. Together, these proposed changes create a coherent framework to operationalize UNFCCC expectations within **TREES** and ensure robust, verifiable safeguards reporting.

Section 3.1.2 -National Reporting Requirements (SIS)

Rationale

While TREES requires Participants to have a SIS, it does not currently clarify what it means to have an SIS “in place” for validation and verification purposes. This creates uncertainty for jurisdictions and VVBs alike: what counts as sufficient evidence of a functional SIS, and how should VVBs assess it?

To address this, we recommend that ART develop additional guidance – for example, a dedicated guidance note or an update to the TREES standard – outlining the expected design features and evidence of a credible SIS. The attached Annex II -*Guidance Note: Developing a High-Quality SIS* offers a useful reference, as it translates UNFCCC principles into practical steps that jurisdictions can follow. ART’s guidance could distil these points and UNFCCC decisions into a TREES-specific benchmark, standardizing expectations and reducing confusion among Participants and VVBs.

A credible SIS should meet four key criteria:

- **Transparency:** Information is publicly available and updated regularly (at least every two years). VVBs should be able to verify this by accessing the SIS platform or reviewing published reports.
- **Completeness:** The SIS covers all Cancún safeguards (A–G), with information mapped against each TREES safeguard theme to ensure no safeguard is overlooked.
- **Stakeholder participation:** Stakeholders – including IPs & LCs, civil society, women, youth, and vulnerable groups – are actively engaged in SIS design and reporting. Information must be presented in user-friendly formats, local languages, and through channels that reach remote communities.
- **Grievance linkage:** The SIS is connected to the jurisdiction’s grievance redress mechanism, clearly directing stakeholders on how to submit concerns and how those grievances are resolved.

By defining these criteria, ART would be operationalizing UNFCCC SIS principles within TREES, giving Participants a clear target and VVBs a concrete checklist for validation and verification. This could be supported by a simple SIS reporting template in the Registration Document (TRD), requiring Participants to provide, for example, the URL or copy of their SIS report, dates of last update, a summary of how each safeguard is covered, evidence of public disclosure, and documentation of stakeholder engagement.

Importantly, this guidance should not penalize countries that are still building capacity. ART could adopt a phased approach or allow time-bound improvement plans, similar to practices in MRV. If an SIS exists but requires strengthening, ART could still approve crediting provided the Participant commits to defined improvements within a set timeframe.

In this way, ART would ensure that every TREES Participant has at least a basic, functioning SIS aligned with UNFCCC requirements, while also encouraging continuous improvement.

This section therefore presents recommendations to strengthen SIS requirements in TREES, including targeted amendments to the standard text (notably Section 3.1.2), the Validation and Verification Standard (VVS), and the TRD/TMR templates. Together, these changes would make SIS a more consistent, transparent, and participatory element of safeguards reporting under TREES.

Proposed Amendment Section 3.1.2

Add after requirements on the SIS:

Participants shall provide evidence that the SIS is publicly accessible, regularly updated, and covers all Cancún safeguards (A–G). The SIS shall demonstrate stakeholder participation in its design and reporting, and shall be linked to feedback and grievance mechanisms, providing stakeholders with clear channels to submit inputs or concerns.

Proposed Amendment VVS for Section 3.1.2

Validation Scope

The VVB shall confirm that the Participant has an SIS in place that is:

- Publicly accessible (e.g., website, published reports);
- Up-to-date (information updated at least every two years);
- Comprehensive (covering all Cancún safeguards);
- Developed with stakeholder participation (documented consultations, multi-stakeholder review bodies, processes for stakeholder contributions to reporting);
- Linked to grievance and feedback mechanisms.

Verification Scope

The VVB shall verify, during each monitoring period, that:

- Verify that the SIS has been updated during the monitoring period and remains accessible;
- Check evidence of stakeholder engagement in SIS reporting (e.g., meeting minutes, consultation records, processes for stakeholder contributions to monitoring and reporting);
- Confirm that feedback/grievances submitted through the SIS or linked mechanisms were logged and addressed;
- Verify disclosure of safeguard information in formats/languages accessible to IPs & LCs and other stakeholders.

Findings (Safeguard Guidance (Annex I), Section 3.6.3.4)

- Major non-conformance: No SIS in place; SIS not public; safeguards A-G not covered; no stakeholder participation or grievance linkage.
- Minor non-conformance: SIS in place and public, but updates delayed; partial coverage of safeguards; incomplete documentation of stakeholder engagement; limited dissemination to local communities.

Proposed Amendments to the TREES Templates Section 3.1.2

1. TREES Registration Document (TRD) Template

New Section on SIS

The Participant shall:

- Describe the SIS (digital platform or reporting system) used to provide information on safeguards;
- Provide the SIS URL or attach the most recent safeguard report;
- Confirm how often the SIS is updated and provide dates of last update;
- Explain how the SIS covers all Cancún safeguards (A-G);
- Describe stakeholder participation in SIS development/ review;
- Explain how SIS information is disseminated to IPs & LCs, local communities, and other stakeholders (e.g., local languages, summaries, workshops);
- Confirm how the SIS is linked to grievance mechanisms.

2. TREES Monitoring Report (TMR) Template

New Section on SIS

For the reporting period, the Participant shall:

- Confirm SIS was updated and provide the date of latest update;
- Report on how SIS information was disclosed (e.g., website uploads, printed reports, local dissemination);

- Provide evidence of stakeholder participation in reviewing SIS information;
- Summarize any stakeholder feedback or grievances submitted through SIS or linked channels, and describe how they were addressed;
- Provide documentation (e.g., screenshots, meeting notes, grievance logs).

Section 2.6- Stakeholder Engagement

Rationale

Stakeholder engagement is a central pillar of the Cancún safeguards, particularly Safeguard D on full and effective participation and Safeguard B on transparent governance. TREES 3.0 currently addresses stakeholder engagement mainly in terms of ART-level notifications (listservs, comment periods) and public comment opportunities through the Secretariat. While this ensures transparency at the international level, the **jurisdictional level engagement processes** – where REDD+ activities are designed, ERR rights clarified, and benefit-sharing plans developed – require further strengthening.

In particular, TREES does not currently specify how participants should:

- Leverage the **Safeguard Information System (SIS)** as a two-way channel for stakeholder engagement and feedback;
- Ensure **inclusive participation** of IPs & LCs, women, youth, and vulnerable groups in decisions related to ERR rights (Section 3.4.1) and benefit-sharing (Section 3.4.2);
- Institutionalize participation through **multi-stakeholder bodies** that review safeguard reporting and BSP implementation; and
- Disseminate information in **locally appropriate formats and languages**, ensuring access for communities that may not have internet access or familiarity with technical documentation.

By clarifying these requirements, ART would reinforce that stakeholder engagement under TREES is not just procedural (comments to the Secretariat), but substantive – ensuring that IPs & LCs and civil society are **active participants in safeguards monitoring and REDD+ governance**. This strengthens TREES alignment with UNFCCC decisions and increases market and community trust.

This section therefore presents recommendations to amend Section 2.6 of TREES, strengthen VVS guidance, and update TRD/TMR templates to operationalize robust stakeholder engagement, integrated with SIS and linked to ERR rights and benefit sharing.

Proposed Amendment Section 2.6

Add new clause after 2.6.2

2.6.3 Domestic Stakeholder Engagement

Participants shall subject both the TREES Registration Document (TRD) and each TREES Monitoring Report (TMR) to domestic public consultation prior to final submission. These consultations shall be documented, including summaries of stakeholder feedback, how comments were addressed, and evidence of dissemination in appropriate languages and formats. The results shall be annexed to the TRD or TMR.

Proposed Amendment VVS for Section 2.6

Validation Scope

VVB shall confirm that the TRD was disclosed domestically, consulted upon with IPs & LCs, civil society, and vulnerable groups, and that feedback was annexed.

Verification Scope

VVB shall confirm that the TRD was disclosed domestically, consulted upon with IPs & LCs, civil society, and vulnerable groups, and that feedback was annexed.

Findings (Safeguard Guidance (Annex I), Section 3.6.3.4)

- **Major Non-conformance:** TRD or TMR submitted without documented domestic consultation.
- **Minor Non-conformance:** Consultation occurred but was incomplete (e.g., limited outreach or poor documentation) without evidence of systematic exclusion.

Proposed Amendments to the TREES Templates Section 2.6

1. TREES Registration Document (TRD) Template

New Section on Stakeholder Engagement (section 17?)

The Participant shall provide a summary of domestic consultations on the TRD, including:

- **Methods used to disseminate the draft TRD (languages, channels);**
- **Stakeholder groups engaged;**
- **Number and types of comments received;**
- **How comments were addressed in the final TRD.**

2. TREES Monitoring Report (TMR) Template

New Section on Stakeholder Engagement (section 17?)

For the reporting period, the Participant shall provide a summary of domestic consultations on the draft TMR, including:

- **Dissemination channels and languages used;**
- **Stakeholder groups consulted**
- **Comments received;**
- **Responses and changes made prior to submission.**

IV. Grievance Redress Mechanism

Context and Rationale

An effective grievance redress mechanism (GRM) is fundamental to the integrity of REDD+ programs. International best practice requires that non-judicial grievance mechanisms, such as ART's, meet principles of **legitimacy, accessibility, predictability, equitability, transparency, cultural appropriateness, rights-compatibility, impartiality, independence, confidentiality, anti-retaliation, and continuous learning.**

While Section 16 of TREES 3.0 establishes a complaints and appeals process, a close analysis reveals that it falls short of these standards. Key shortcomings include:

- **Limited transparency:** Outcomes are not publicly disclosed, undermining accountability.
- **Restricted accessibility:** Only narrowly defined complainants can file, and only in English by email, excluding many legitimate stakeholders.
- **Narrow scope:** The mechanism only reviews whether ART followed its procedures, not the substance of ART's decisions or Participant/VVB safeguard compliance.
- **Lack of predictable timelines:** Apart from an initial eligibility screening, there are no firm deadlines for investigations or appeals.
- **Weak impartiality:** Reviewers are hand-picked by ART from a non-transparent roster, the ART Board appears to retain oversight of outcomes, and the ART Secretariat exercises discretion as to whether it will act upon findings. This all raises independence concerns.
- **Insufficient protections:** While confidentiality is addressed via NDAs, there are no explicit anti-retaliation guarantees or whistleblower protections.
- **No cultural appropriateness:** Complaints can only be submitted in formal written English, via email, with no support for local languages or oral testimony.
- **Unclear remedies:** The mechanism does not explicitly provide redress for affected stakeholders; it is not clear what redress is available, the role the Reviewer and ART Board have in defining and approving those remedies, and outcomes are limited to "corrective and preventive actions" at ART's discretion.

Given ART's significant role in the carbon market and the impact its decisions can have on communities, civil society, and market confidence, its grievance mechanism must go beyond a procedural "check-box" exercise. It must be seen as legitimate, accessible, and capable of delivering meaningful remedies when stakeholders experience actual or imminent harm.

Section 16

This section therefore provides targeted recommendations for amending Section 16 of TREES to align it with international best practice and for non-judicial grievance mechanisms, strengthening ART's accountability and the credibility of TREES credits.

Proposed Amendment Section 16

16.1 SCOPE

The TREES Complaints and Appeals procedure is for reporting instances in which **ART's actions, omissions, decisions, or requirements- including those of oversight of Participants and the VVBs operating under ART approval** ~~the processes required by ART~~ have not been followed, **or have otherwise resulted in actual or imminent material harm to stakeholders.** ~~resulting in harm to stakeholders living and/or using forest resources in the REDD+ accounting area.~~ **This includes failures**

to apply ART's standards consistently or substantively, or instances where safeguard-related commitments under TREES are not upheld.

The procedure is open to any stakeholder (for the purposes of this Section, 'stakeholder' excludes the Participant) materially affected by ART's actions, omissions, decisions, or requirements, or oversight of Participants and VVBs, including but not limited to: individuals and groups living in or using forest resources in the REDD+ accounting area; Indigenous Peoples and local communities; Afro-descendant Peoples; civil society organizations; and other legitimate representatives acting with the consent of affected individuals or communities.

The TREES Complaints and Appeals procedure is not for grievances related to the design and/or implementation of a Participating jurisdiction's REDD+ Program or for complaints regarding the conduct or decisions of the Validation and Verification Body.

Complaints regarding a Participant's REDD+ program, including participatory processes, distribution of benefits, activities or communities included in the program, access to information, FPIC or any topic related to the design and implementation of the REDD+ program and TREES safeguards should be directed to the appropriate dispute resolution mechanism in the jurisdiction. **Where such mechanisms are not effective, complainants may escalate the matter to ART, which shall review whether the Participant has satisfied its obligations under TREES and, if not, require corrective action.**

As required by Section 12, non-discriminatory and non-cost prohibitive dispute resolution mechanisms must be in place and these mechanisms must provide effective recourse and remedies in the case of a violation of rights, grievance, dispute or claim related to the implementation of REDD+ activities.

If the Complainant does not feel the dispute resolution mechanisms are effective, they should report this concern to the Validation and Verification Body during the validation and verification process or to ART as part of the public comment process as described in Section 2.6.2.

Complaints on the conduct or decisions of the Validation and Verification Body can be reported to ART or to the Validation and Verification Body through its complaint process. If reported to ART, ART will forward the complaint to the VVB and, if appropriate, to the appropriate IAF accreditation member to be addressed through their process. ART will also take the complaint **and its treatment** into account as part of our Validation and Verification Body oversight process, but this will not be addressed through the TREES Complaint and Appeal process.

16.2 COMPLAINTS

Eligibility

Complaints must meet the following requirements to be considered eligible:

- ~~Complainants must be one or more individuals who live and/or use forest resources in the REDD+ accounting area.~~
- ~~Complainant must demonstrate harm or imminent pending harm from ART's failure to follow its processes.~~
- ~~If a Complainant is a representative organization, it must include the names of the individual or individuals being harmed and their consent to be represented by the organization.~~
- ~~The complaint must represent a new issue not associated with a previous complaint.~~
- **The complainant is any materially affected stakeholder, including but not limited to: individuals, groups, Indigenous Peoples, Local Communities, Afro-descendant Peoples, civil society organizations, NGOs, private sector actors, or other representatives acting with**

the consent of affected individuals, communities, or according to customary representation practices.

- The complainant demonstrates actual or imminent material harm linked to ART's actions, omissions, decisions, requirements, or oversight of Participants and VVBs.

Complaints may be submitted individually, jointly, or through representative organizations.

Repeat complaints may be admitted if new evidence emerges or if previous resolutions were not implemented effectively.

Accessibility

Complaints may be submitted in writing, orally, or electronically through multiple channels (e.g., web form, postal mail, community focal points, or email to red@winrock.org)

Submissions shall be accepted in any relevant language.

ART shall proactively inform stakeholders of the existence of this procedure in multiple languages and culturally appropriate formats.

To submit a complaint, the Complainant sends a written complaint via email to red@winrock.org.

Content of Complaint

Complaints should, to the extent possible, identify the specific provision of ART's standard or guidelines, at issue. However, complaints shall not be rejected solely for lack of technical references. ART shall provide support to complainants in framing their concerns against TREES provisions.

The complaint must detail the following:

1. Description of the ~~eligible complaint with specific~~ including reference to ~~TREES requirements that were not followed,~~ **ART actions, omissions, decisions, requirements, or oversight of Participants and VVBs (If known) that is related to the harm alleged;**
2. Complainant name, contact details, and organization **(unless anonymous submission is chosen);**
3. Description of the actual or imminent harm to the Complainant **or affected stakeholders;** and
4. Supporting documentation, **if available** ~~provided for consideration by the reviewer in the complaint resolution process.~~

Confidentiality and Anti-Retaliation

~~In instances where a Complainant wishes to~~ **may remain anonymous, including to ART from the ART Participant or other external stakeholders,** by submitting through a secure third-party channel.

~~ART shall make appropriate accommodation providing that the identity of the Complainant must be made known to ART and to the reviewer.~~

ART shall maintain an explicit no-retaliation policy: if any complainant suffers retaliation for using the mechanism, ART will take appropriate action, including sanctions against Participants or VVBs.

Independence

The ART Secretariat will maintain a list of qualified individuals not employed by ART or Winrock who may be called upon to review any complaint received. ART will select a reviewer based on availability and the nature of the complaint.

Reviewers shall be selected from a transparent, pre-approved roster of independent experts, which shall include experts on relevant topics from civil society and Indigenous Peoples, local communities and Afro-descendants.

Reviewers shall be appointed in rotation or through an independent oversight committee, not solely by the ART Secretariat.

Process and Timelines

If a complaint is received, the ART Secretariat will acknowledge receipt to the Complainant **within 5 business days**, and then appoint an external reviewer **within 10 days** to evaluate whether the complaint meets the eligibility criteria.

Eligibility shall be decided within 20 business days of reviewer appointment.

Investigations shall be completed within 90 days of eligibility confirmation, unless extended with justification and periodic updates to complainants. If irreparable harm can occur in the interim, the reviewer can recommend a temporary corrective action without prejudice to the final findings.

~~The reviewer will notify the complainant of the eligibility decision within 20 business days of being appointed.~~

~~If the complaint is eligible, a qualified reviewer will investigate the complaint.~~

Investigations and Outcomes

The investigation may include interviews with relevant stakeholders, a review of documents and information, and/or consultation with external experts as needed. ~~All involved stakeholders, including ART, the VVB, the reviewer, and the Complainant and named individuals, will be required to sign Non-Disclosure Agreements limited to the term of the complaint review process to ensure the review process remains objective and uninfluenced by outside parties.~~

The reviewer's final report, including conclusions and recommended remedies, shall be binding unless a clear procedural error is identified on appeal.

ART shall publish summaries of all complaints, decisions, and remedies in an online registry, updated annually, with appropriate confidentiality protections where prior anonymity was requested.

Remedies may include: corrective action by ART or Participants; suspension of credit issuance; re-consultations with affected communities; restitution or compensation where appropriate; public apologies, or other necessary measures to restore rights, mitigate harm, or otherwise make the aggrieved party whole. Lessons learned from complaints shall feed into continuous improvement of the TREES program.

~~The reviewer will submit a report summarizing the investigation and their conclusion to the ERT Board. Following the ERT Board review, the reviewer will share a copy of the report with the ART Secretariat and the Complainant.~~

~~If appropriate, the ART Secretariat will develop corrective and preventive actions to address the~~

findings of the reviewer.

16.3 APPEALS

Parties may file an appeal within 30 days of receiving a decision if there is evidence of:

- Errors of fact, law, or procedure;
- Bias or lack of impartiality by the reviewer; or
- Failure to consider material evidence.

If within 30 days of the receipt of the reviewer's Complaint Report, the Complainant obtains evidence not previously considered during the Complaint process that would reasonably be expected to have impacted the decision, the Complainant may file an appeal including the evidence that was not considered. An appeal may not be filed only to dispute the outcome and must be filed by the same organization and affected individuals that filed the Complaint.

Appeals must be filed by the same organization or affected individuals that were party to the original complaint. Appeals may be submitted through the same accessible channels as complaints and in any relevant language.

To file an appeal, the Complainant sends a written appeal via email to red@winrock.org. The appeal must provide a detailed description of the appeal with specific reference to evidence that was not considered during the complaint review process.

Appeals shall be reviewed by a different independent reviewer or panel than the one who heard the original complaint.

In instances where a Complainant wishes to remain anonymous from the ART Participant or other external stakeholders, ART shall make appropriate accommodation providing that the identity of the Complainant must be made known to ART and to the reviewer.

Appeals shall follow the same predictable timelines as initial complaints:

- Acknowledgement within 5 business days;
- Eligibility decision within 20 business days;
- Final decision within 90 days of eligibility confirmation, unless extended with justification.

The final appeal decision shall be published (anonymized where necessary) and binding. Subsequent appeals on the same matter shall not be accepted.

If an appeal is received, the ART Secretariat will acknowledge receipt to the Complainant and then appoint an external reviewer based on availability and the nature of the complaint. The reviewer will evaluate whether the appeal meets the eligibility criteria and will notify the complainant of the eligibility decision within 20 business days of being appointed. The reviewer for the appeal will be a different individual than reviewed the complaint.

If the appeal is eligible, a qualified reviewer will investigate the appeal. The investigation may include interviews with relevant stakeholders, a review of documents and information, and/or consultation with external experts as needed. All involved stakeholders, including ART, the VVB, the reviewer, and the Complainant and named individuals, will be required to sign Non-Disclosure Agreements limited to the term of the appeal review process to ensure the review process remains objective and uninfluenced by outside parties. The reviewer will submit a report summarizing the investigation and their conclusion to the ERT Board. Following the ERT Board review, the reviewer will share a copy of the report with the ART Secretariat and the Complainant.

If appropriate, the ART Secretariat will develop corrective and preventive actions to address the findings of the reviewer.
The conclusion of the appeal reviewer will be considered final and subsequent appeals will not be accepted.

Conclusions

In closing, we commend ART for proactively updating the TREES standard at this pivotal juncture and for integrating lessons learned from the first years of jurisdictional REDD+ implementation. Our detailed recommendations above aim to **strengthen the social integrity and credibility** of TREES 3.0 so that it can fully deliver on its promise: high-quality emission reductions **paired with robust safeguards and equitable benefits**. By embracing the proposed clarifications – from tightening safeguard requirements and explicitly mandating FPIC, to strengthening its GRM, sharpening its treatment of carbon rights and transparency in benefit-sharing – ART can ensure that jurisdictional REDD+ programs **do more than reduce carbon**: they uphold communities’ rights, foster trust with stakeholders, increase demand through improved market integrity, and enhance co-benefits for people and nature.

Our submission underscores five priority areas for strengthening **social integrity** in TREES 3.0:

- **Safeguards (Section 12)**: Clear, actionable requirements that make safeguards operational throughout program design and implementation, supported by dedicated Safeguard Implementation Guidance to bridge the gap between principles and practice.
- **ERR Rights (Section 3.4.1)**: Stronger provisions requiring comprehensive tenure assessments, express recognition of customary rights, the application of FPIC and disclosure requirements to ERR agreements where rights-holders are affected, to ensure credits rest on a solid foundation of legal and social legitimacy.
- **Benefit Sharing (Section 3.4.2)**: Transparent, equitable arrangements, publicly disclosed and verifiable, that guarantee climate finance reaches Indigenous Peoples, local communities, and other forest stewards in a fair and inclusive manner.
- **Stakeholder Engagement and SIS (Sections 2.6, 3.1.2)**: Enhanced requirements for meaningful participation and robust, transparent safeguard information systems that function as active channels for accountability and stakeholder oversight.
- **Grievance Redress (Section 16)**: A strengthened, independent, and accessible mechanism capable of providing timely and legitimate remedies to affected stakeholders, reinforcing trust and accountability in the ART system.

If adopted, our proposed enhancements will help **align TREES 3.0 with international best practices, the international duties and obligations of Participants** (UNFCCC Cancún safeguards, UNDRIP, ICCPR, and others), giving jurisdictions a clear roadmap to deliver emission reductions **without social trade-offs**. In practice, this means REDD+ programs under ART will be better equipped to protect indigenous rights, prevent land conflicts, combat corruption, and promote inclusive decision-making – all while achieving climate goals and contributing to the growth of a high integrity carbon market that crowds in public and private finance. The ultimate outcome will be a REDD+ credit that is **beyond reproach in integrity**, satisfying both carbon market requirements and the expectations of communities, NGOs, and buyers for strong social and environmental outcomes.

Finally, we wish to comment on ART’s **Beyond Carbon Benefits (BCB)** initiative in the context of TREES 3.0. We welcome the intent of the new BCB certification to recognize and reward the positive social, cultural, and biodiversity impacts of REDD+ programs. However, we emphasize the importance of **sequencing**: the core TREES standard revisions should be finalized and implemented **before rolling out the optional BCB modules**. In our view, a robust TREES 3.0 – with strengthened safeguards, rights protections, and benefit-sharing mechanisms – is the necessary foundation upon which any “beyond carbon” claims must rest. By completing the TREES 3.0 updates first, ART will ensure that jurisdictions focus on **getting the basics right (social and environmental integrity) through satisfaction of TREES**, and only then move to transparently report *additional* co-benefits. This sequencing will avoid confusion, inadvertent duplication of requirements, prevent dilution of attention from critical core issues, and ultimately make the BCB certification more credible and valuable once it is layered onto a strong base.

We appreciate the opportunity to contribute to this. We firmly believe the draft TREES 3.0 is moving in the right direction, we support these enhancements to safeguard and benefit-sharing provisions, and agree that ART should hold all programs to the highest standards of integrity and transparency. We are encouraged by ART's receptiveness to stakeholder input and its commitment to continuous improvement. By adopting the recommendations in this submission – and by timing new initiatives like BCB appropriately – ART can solidify its leadership in high-integrity jurisdictional REDD+. We look forward to seeing these revisions reflected in the final TREES 3.0 standard and stand ready to support their implementation.

Safeguard Implementation Guidance for ART TREES 3.0 (Section 12)

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Introduction

This guidance document provides detailed implementation advice for Section 12 (Safeguards) of the ART TREES 3.0 Standard. It is designed to help jurisdictions (“Participants”) develop and implement REDD+ programs in consistency with all Cancun Safeguards.

The guidance is organized by safeguard theme, following the thematic breakdown of the Cancun Safeguards in TREES. For each theme, the guidance:

- **Clarifies the objective** of the safeguard,
- **Sets out benchmarks and expectations** for the Structure/Process and Outcome indicators under TREES, and
- **Provides examples** of implementation measures and appropriate documentation.

Notably, this guidance underscores that meeting the TREES safeguards is **more than a “do no harm” checklist – jurisdictions must actively align their REDD+ implementation with the Cancun safeguard principles**. In practice, this means demonstrating that all REDD+ actions in a jurisdiction’s implementation plan are carried out consistently with the safeguards so that activities truly do no harm. TREES 3.0 accordingly shifts emphasis toward **proactive, ongoing adherence** to safeguards (rather than solely retrospective reporting) as REDD+ activities are implemented. The level of detail in this document reflects good-practice international standards (e.g. IFC Performance Standards, UNDP Social and Environmental Standards), making it a comprehensive companion to TREES 3.0 that elaborates on internationally recognized good practices without duplicating TREES text.

Theme 1.1: Consistency with the objectives of National Forest Programs

Objective: *Ensure that REDD+ actions are designed and implemented in harmony with the country's national forest programs, strategies, or policies.*

This safeguard theme corresponds to Cancun Safeguard (a), requiring REDD+ actions to **complement or be consistent with national forest program objectives**. The goal is to promote country ownership and policy coherence: REDD+ should reinforce existing forest goals and objectives (such as those contained in national forest plans and/or programmes). In practice, this means a jurisdiction's REDD+ actions must align with and support national priorities for forest conservation, sustainable management, and climate goals (including the country's NDC and other commitments).

Structure/Process Indicators– Expectations for Jurisdictions

Jurisdictions must demonstrate that their REDD+ actions are consistent and/or complement national forest program's goals or objectives. Specifically, auditors will expect to see the following information and associated evidence of:

- **Legal and Institutional Forest Framework:** the key legal and policy instruments that together define the objectives of national forest programs (if a sub-national jurisdiction, should also include state level legal and policy architecture that define objectives of sub-national forest programs).
- **Legal and Institutional REDD+ Framework:** The REDD+ strategy is in place, formally adopted, and disseminated. This strategy should outline the country's objectives for forests (e.g. reducing deforestation, enhancing carbon stocks, improving livelihoods) and identify and/or provide guidance or criteria for REDD+ actions. There should be institutions or coordination bodies responsible for implementing this strategy, and which have clear mandates and procedures that support this consistency.
- **Alignment between REDD+ actions and forest objectives:** a clear understanding and description of how the REDD+ strategy (and if possible, each REDD+ action) is consistent with national forest policies/programs. It is recommended that a summary table is prepared (see illustrate example below), which synthesizes this legal and institutional alignment by listing:
 - The forest program/legal instrument;
 - Its key objectives;
 - How Jurisdiction's REDD+ strategy supports those objectives;
 - The responsible institutions; and
 - The specific mandates or processes of these institutions that contributes to the achievement of REDD+ Strategy (REDD+ actions) objectives.

Forest Program / Legal Instrument	Forest Objectives	How the Jurisdiction's REDD+ Strategy is consistent with these objectives	Responsible Institution	Institutional mandates and procedures
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Outcome Indicators – Expectations for Jurisdictions

Over time, jurisdictions must show that **REDD+ actions have been designed and carried out in a way that is consistent with, or complements, the national forest program's objectives**. In practical terms, this means

auditors should find that REDD+ actions are not isolated or contradictory efforts, but rather **contribute to these broader goals**. Expected evidence and outcomes include:

- **Consistent Design:** REDD+ Strategy (and if possible, each REDD+ action) can be traced to one or more objectives or priorities in the national forest policies/plans. For example, if the national forest policy prioritizes reducing deforestation in high-biodiversity areas, the REDD+ activities implemented (such as creating protected areas, community forestry in those regions) should reflect that priority. Documentation might include a mapping of REDD+ actions against the strategic goals in the national forest plan. Auditors may cross-check REDD+ actions against existing laws and sector plans to ensure consistency.
- **Policy Complementarity in practice:** REDD+ Strategy (and if possible, each REDD+ action) fill gaps or strengthen the national forest policies. If the national forest policy has introduced certain regulations (e.g. a logging moratorium or agroforestry promotion), the REDD+ actions should help enforce and complement those regulations on the ground. There should be **no conflicts** between what REDD+ actions do and what national laws/policies require. Jurisdictions should be able to clearly demonstrate the REDD+ strategy has **contributed to tangible outcomes** that directly advance national and subnational forest objectives, including on forest conservation, sustainable use, and climate resilience at the jurisdictional level.
- **Institutional Coordination in Practice:** Evidence that public institutions involved in REDD+ (forest departments, environment ministries, etc.) actually coordinate their efforts under the umbrella of the national forest policy. For instance, minutes from inter-agency meetings or joint implementation reports can show that REDD+ actions are implemented as part of a unified program rather than disparate actions.

Implementation Guidance

To meet Theme 1.1, jurisdictions should take the following steps and provide robust documentation:

- **Establish the National Strategy and embed alignment:** Ensure a **National REDD+ Strategy or equivalent forest strategy/plan** exists. This should be publicly available and officially endorsed. If one exists, document its key objectives and scope, including how each REDD+ action contributes to objectives of forest policies, programs and/or plans. If not, describe interim measures (e.g. a draft strategy or relevant forest policies) that guide REDD+ implementation.
- **Coordination Mechanisms:** Form **multi-level coordination bodies** – e.g. a National REDD+ Steering Committee including subnational representatives – to oversee alignment. Document meeting schedules, participant lists, and decisions or recommendations issued to ensure activities support national objectives.
- **Stakeholder Engagement:** Communicate REDD+ strategy's objectives and goals to local stakeholders so they understand how local REDD+ actions fit into the bigger picture. This can improve buy-in and coherence. For enabling measures (policy-level), engage national stakeholders (e.g. civil society, indigenous peoples' organizations) in their development to ensure broad support, which helps in aligning field activities later.
- **Documentation Examples:** Participants can provide copies of the national forest program/REDD+ strategy, official policy statements linking REDD+ to national goals, memos or letters that instruct subnational agencies on aligning REDD+ actions with national plans, and any analytical mapping of REDD+ outcomes to national targets (for instance, a table showing how each REDD+ action contributes to national deforestation reduction targets or sustainable development goals).

Theme 1.2: Consistency with the objectives of relevant international conventions and agreements

Objective: *Ensure that REDD+ implementation recognizes and promotes the application of all relevant international conventions and agreements that the country has ratified.*

This theme is a second part of Cancun Safeguard (a), extending the alignment beyond national programs to **global commitments**. The goal is to prevent REDD+ actions from undermining a country's international obligations and to leverage REDD+ as a means to fulfil those obligations (for example, commitments under the UNFCCC, Convention on Biological Diversity, human rights treaties, etc.). In practice, jurisdictions must integrate the principles and requirements of ratified treaties into the design and execution of REDD+ actions.

Structure/Process – Expectations for Jurisdictions

Jurisdictions need to show they have the **legal and policy mechanisms to uphold international agreements** in the context of REDD+. Key expectations include:

- **Inventory of Relevant Conventions:** The Participant should identify which international conventions, agreements, and declarations are *relevant to REDD+* and have been ratified or endorsed by the country. These typically include environmental agreements (UNFCCC, CBD, CITES, UN Convention to Combat Desertification), human rights agreements (ILO conventions on labor, UN Declaration on the Rights of Indigenous Peoples (UNDRIP), etc.), and cross-cutting ones (e.g. UN Convention Against Corruption if applicable to benefit transparency).
- **Domestic Incorporation:** Evidence that the country's domestic framework (laws, regulations, or strategies) incorporates the obligations or principles of those international agreements. For example, if the country is party to the Convention on Biological Diversity, there should be a national biodiversity strategy or provisions in environmental law that align with CBD commitments. The presence of enabling legislation or policy directives that translate treaty commitments into action is a strong indicator.
- **Legal and Institutional REDD+ Framework:** The REDD+ strategy is in place, formally adopted, and disseminated. This strategy should outline the jurisdiction's objectives that are relevant and consistent with its international commitments. There should be institutions or coordination bodies responsible for implementing this strategy, and which have clear mandates and procedures that support this consistency.
- **Alignment between REDD+ actions and global objectives:** a clear understanding and description of how the REDD+ strategy (and if possible, each REDD+ action) is consistent with objectives of international conventions and agreements. It is recommended that a summary table is prepared (see illustrate example below), which synthesizes this legal and institutional alignment by listing:
 - The relevant international convention or agreement;
 - Its key objectives;
 - How the Jurisdiction's REDD+ strategy supports those objectives;
 - The responsible institutions; and
 - The specific mandates or processes of these institutions that contributes to the achievement of REDD+ Strategy (REDD+ actions) objectives.

International convention or agreement	Objectives	How the Jurisdiction's REDD+ Strategy is consistent with these objectives	Responsible Institution	Institutional mandates and procedures
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Outcome – Expectations for Jurisdictions

Jurisdictions must demonstrate that **REDD+ activities have been implemented in a manner consistent with the identified international conventions**, meaning that they actively uphold and do not violate any of the country's treaty obligations. Expected outcomes and evidence include:

- **No Violations of International Obligations:** Auditors should find no instance where a REDD+ action led to a breach of a treaty commitment. For example, if the country has an obligation to protect endangered species (under CBD or CITES), REDD+ actions should not involve harm to such species or their habitats. If the country committed to human rights treaties, there should be no REDD+ measure that resulted in human rights infringements.
- **Support of International Goals:** Ideally, REDD+ actions contribute positively to fulfilling international commitments. Evidence could be qualitative or quantitative: e.g. reports showing how REDD+ actions helped progress on biodiversity targets (Aichi targets or post-2020 Global Biodiversity Framework), or how it advanced the Paris Agreement goals on mitigation by delivering verified emission reductions. If the country supports the Sustainable Development Goals (SDGs), the REDD+ program outcomes can be mapped to relevant SDGs (such as SDG 13 Climate Action, SDG 15 Life on Land, SDG 16 institutions in terms of transparency).
- **Regular Reporting and Transparency:** Many conventions require reporting (e.g. CBD National Reports, human rights reviews). The outcome of consistency means the jurisdiction can include REDD+ information in these reports as evidence of compliance, and vice versa. The country's Summary of Information on safeguards (submitted to UNFCCC) can also highlight how international obligations were respected in the REDD+ program.
- **Institutional Cooperation:** Public institutions responsible for treaty implementation (such as environment, foreign affairs, or human rights commissions) have been engaged in REDD+ governance. Their involvement (documented via inter-ministerial committees or advisory inputs) shows that REDD+ outcomes were scrutinized for consistency with international standards. This often results in REDD+ program adjustments to better meet treaty standards (for example, improving gender inclusion to align with CEDAW – Convention on Elimination of Discrimination Against Women – obligations).

Implementation Guidance

To meet Theme 1.2, jurisdictions should take the following steps and provide robust documentation:

- **Mapping relevant and applicable international conventions and agreements:** Conduct a **mapping exercise** of all international conventions and agreements relevant and applicable to REDD+ and identify how each safeguard theme relates. For example, map Cancun Safeguard (c) & (d) to human rights treaties (ICCPR, ICESCR, UNDRIP), Safeguard (e) to environmental treaties (CBD, Ramsar), Safeguard (b) to UNCAC (anti-corruption), etc. This mapping can guide implementers on what international principles to uphold.

- **Legal Gap Analysis:** Review national legislation/policies to ensure that for each ratified convention, there is corresponding domestic coverage. If gaps exist (e.g. a country ratified UNDRIP but has no legal mechanism for FPIC), develop interim measures for REDD+ specifically. For instance, the REDD+ strategy could require FPIC in line with UNDRIP even if not yet mandated by law. Document these measures clearly.
- **Establish the National Strategy and embed alignment:** Ensure a **National REDD+ Strategy or equivalent forest program** exists. This should be publicly available and officially endorsed. If one exists, document its key objectives and scope, including how each REDD+ action contributes to objectives of relevant and applicable international conventions and agreements. If not, describe interim measures (e.g. a draft strategy or relevant forest policies) that guide REDD+ implementation.
- **Coordination Mechanisms:** Form **multi-level coordination bodies** – e.g. a National REDD+ Steering Committee including subnational representatives – to oversee alignment. Document meeting schedules, participant lists, and decisions or recommendations issued to ensure activities support objectives of relevant and applicable international conventions and agreements.
- **Capacity Building:** Train REDD+ program staff and stakeholders on the content of key conventions. If communities are involved, raising their awareness that the program intends to uphold things like UNDRIP, ILO 169, etc., can build trust. For enabling actions such as passing new regulations, ensure drafters consult international standards or model laws (many treaties come with guidance on national implementation).
- **Engage Treaty Focal Points:** Coordinate with national focal points for conventions (e.g. the UNFCCC National Focal Point, CBD focal point, etc.) during the planning and monitoring of REDD+ actions. Their input can ensure the program's direction supports international reporting and compliance. Keep records of such consultations or written advice from these offices.
- **Documentation Examples:** A comprehensive **safeguards report** by the Participant can list each relevant international convention and describe measures taken to ensure consistency in REDD+ implementation. Other documentation might include excerpts of laws or strategies transposing treaty requirements, meeting notes with ministries (for example, Ministry of Environment confirming that REDD+ adheres to biodiversity obligations), and evidence of no-objection or endorsement from bodies like National Human Rights Institutions for how REDD+ action respects international human rights commitments.

Theme 2.1: Respect, Protect, and Fulfill the Right of Access to Information

Objective: *Ensure transparency and access to information for all stakeholders regarding REDD+ activities, benefit distribution, and how safeguards are addressed.*

This theme (under Cancun Safeguard B: governance) is about upholding the **public’s right to know**. It aims to foster trust, accountability, and informed participation by guaranteeing that stakeholders – especially those affected by or interested in REDD+ – can obtain relevant information easily. In essence, jurisdictions must both proactively disclose information about the REDD+ program and respond to information requests, in a non-discriminatory manner.

Structure/Process – Expectations for Jurisdictions

Participants should have in place laws, policies and procedures to provide access to REDD+-related information. Key expectations include:

- **Freedom of Information (FOI) or Transparency Laws:** Ideally, a national (or subnational) law exists that grants the public the right to access government-held information, including environmental information. If such a law (e.g. a Freedom of Information Act) is in place, the Participant should clearly apply it to REDD+ actions. If no general law exists, the REDD+ program should have its own transparency policy – for instance, a commitment in the REDD+ Strategy that certain documents and data will be made public.
- **Defined Scope of Information:** The information that must be accessible encompasses among others, the *REDD+ actions*, *REDD+ benefit distribution*, and *safeguards implementation*. This means stakeholders should be able to find out what REDD+ actions are being carried out, where and by whom; how benefits (like carbon payments or other incentives) are allocated and distributed; and how the various safeguard requirements (like those in this guidance) are being met. The Participant should have a list or inventory of such information and make much of it **proactively available** (e.g. via websites, public reports, or community notice boards).
- **Procedures for Information Access:** There should be an established process for stakeholders to request information and receive it in a timely manner. This could build upon existing FOI request systems or could be a dedicated helpdesk or contact point for the REDD+ program. The procedure should be timely, and “non-discriminatory and non-cost-prohibitive” – meaning anyone can request information without facing prohibitive fees or biases, and information should be provided in languages/forms accessible to local communities (e.g. translations, plain language summaries).
- **Resources and Record-Keeping:** The jurisdiction needs to assign responsibility (e.g. Safeguard’s officer) and resources to manage information dissemination. They should also maintain records of what information has been disclosed or requested, to track responsiveness.

Outcome – Expectations for Jurisdictions

In practice, the outcome should be that **public institutions have indeed provided access to REDD+ information**, and stakeholders are aware of and exercise their right to know. This can be evidenced by:

- **Availability of Key Documents:** Core REDD+ documents are published and readily accessible. This includes the REDD+ implementation plan (in alignment with section 3.3. of TREES), summaries of consultation meetings, benefit-sharing plans or reports, the safeguards Summary of Information,

periodic monitoring reports, and validation/verification reports. An outcome indicator of success is that these documents are not just theoretically available but have actually been distributed or accessed by stakeholders (e.g. copies available in local government offices of the project area, or online downloads).

- **Stakeholder Awareness and Use:** The public (especially local communities, civil society groups, and other stakeholders) knows that they can obtain information and has done so. For instance, community members can recount receiving information about a REDD+ action in their area, or an NGO can confirm it obtained data about benefit distribution after requesting it. Evidence might include records of information requests by stakeholders and the responses given. If, say, a community organization asked for details on how carbon credit revenues were spent and the government provided a breakdown, that illustrates the right to information being exercised.
- **Transparency Platforms:** The existence of a Safeguards Information System (SIS) or similar platform where safeguard and REDD+ info is periodically updated and publicly accessible. Many countries develop an SIS web portal under UNFCCC requirements – if the Participant has one, it should contain relevant info (policies, indicators, results) and usage statistics can show it’s being accessed. If no portal, then perhaps periodic public meetings or bulletins are used – outcome success would be that these channels are active and well-known.
- **No Reports of Withheld Information:** An important outcome is that there are no substantiated complaints that information about the REDD+ program was unjustifiably withheld or kept secret. If stakeholders or observers have accused the program of secrecy in the past, the Participant should have addressed it (e.g. by releasing the information). Ideally, auditors will find a culture of openness – e.g. officials readily sharing data when asked, and project proponents publishing results voluntarily.

Implementation Guidance

To meet Theme 2.1, jurisdictions should take the following steps and provide robust documentation:

- **Develop a Public Information Plan:** At the program outset, develop a plan that lists what information will be made public, in what form, and when. For example, **commit to publishing:** the REDD+ strategy and REDD+ implementation plan, summaries of consultations, environmental and social impact assessments (ESIAs)-as relevant, benefit-sharing mechanisms and annual reports on benefit distribution, monitoring reports (with safeguards updates), and verification findings. Also outline how the public can request additional information.
- **Outreach and Communication:** Don’t assume “post it and they will see it.” Actively disseminate information to stakeholders. For local communities, that could mean translating summaries into local languages and distributing pamphlets or using radio announcements about REDD+ actions and how to get more information. For national stakeholders, hold press releases or webinars when major REDD+ reports are released. The aim is widespread awareness that information is available.
- **Facilitate Information Requests:** Set up clear channels – an email address, a website form, or an office – where anyone can request REDD+ information. Define service standards (e.g. respond within 30 days). Train the responsible staff to handle requests professionally. Keep a log of requests and outcomes. Over time, analyze this log: Are there recurring types of info people seek? Make those proactively available if not already.
- **Protect Confidentiality as Needed:** Some information (like exact locations of endangered species or personal data of beneficiaries) might need to be handled carefully. Define in the public information

plan what categories might be sensitive and how to provide info in aggregated form if needed. But this should be minimal – err on the side of disclosure unless strong reasons otherwise.

- **Documenting Compliance:** To demonstrate implementation, the Participant can compile a repository of disclosed materials (e.g. links to websites, copies of publications, distribution lists for reports). If a SIS exists, take screenshots or export logs showing content and usage. If responding to requests, keep correspondence records. Essentially, maintain an “audit trail” of transparency.

Theme 2.2: Promote Transparency and Prevent Corruption, including through the promotion of anti-corruption measures.

Objective: *Ensure that REDD+ actions and benefit distribution are carried out transparently and with integrity, including the prevention of corruption, fraud, and mismanagement of resources.*

This theme addresses a core governance safeguard: that the REDD+ program upholds principles of **accountability, rule of law, and integrity** in all its operations. The aim is to foster public confidence and equitable outcomes by minimizing opportunities for corruption – for instance, how funds are allocated to communities, or how results are reported. Cancun Safeguard B implicitly covers this through “transparent and effective governance,” and here it’s made explicit with anti-corruption emphasis.

Structure/Process – Expectations for Jurisdictions

Participants should have in place laws, policies and procedures **that actively promote transparency and combat corruption**, and are applicable to REDD+. Key elements include:

- **Anti-Corruption Legal Framework:** Existence of anti-corruption laws and enforcement bodies (e.g. anti-corruption commission, auditor-general’s office) in the country. The Participant should show that these laws apply to REDD+ finance and actions. If the country is party to the UN Convention Against Corruption (UNCAC), that framework should influence REDD+ governance. Policies might include codes of conduct for public officials, conflict of interest rules, and whistleblower protections, all of which help deter corrupt practices.
- **Transparency Measures:** Institutionalized requirements for financial transparency and oversight in the REDD+ program. For example, if there is a national REDD+ fund or similar, it should have clear rules for budgeting, independent audits, and public financial reporting. Procurement rules for REDD+ should mandate competitive bidding and publication of awarded contracts to avoid favouritism. Participants should maintain records for all financial transactions and decisions in the program. The principles of proper management of public funds and integrity must be evident in processes (for instance, dual signatories for fund disbursements, regular financial reconciliations, etc.).
- **Anti-Corruption Procedures Specific to REDD+:** In many countries, REDD+ involves significant financial flows (e.g. results-based payments), so specific measures might be put in place: such as a corruption risk assessment for the REDD+ strategy, mitigation plans (training staff on anti-corruption, establishing third-party monitoring by civil society), and integration of REDD+ into any existing national anti-corruption action plans. There should also be sanctions or corrective mechanisms defined if corruption is detected (e.g. fraudulent use of REDD+ funds leads to prosecution or fund suspension).
- **Resource and Capacity:** Allocation of resources to implement anti-corruption measures – e.g. having an internal auditor for the REDD+ program, or dedicating some budget to independent financial audits and anti-corruption training. Also, clarity of roles: who in the REDD+ governing body is responsible for compliance with financial management rules?

Outcome – Expectations for Jurisdictions

The program should demonstrate that **REDD+ activities and benefit distribution have been conducted in a transparent, accountable manner and that corruption has been prevented or promptly addressed.**

Expected outcomes include:

- **Transparent Operations:** Evidence that decisions and financial flows in the REDD+ program are open and traceable. For instance, communities and stakeholders know the criteria for benefit distribution and can see the records of who received what (hence tying back to transparency in Theme 2.1). If funds were allocated to certain REDD+ actions, the amounts and recipients should be publicly available. Independent oversight bodies (like national audit offices) have reviewed REDD+ accounts and found them satisfactory. Public institutions have carried out REDD+ actions in an accountable manner, meaning budget execution reports match plans, and any discrepancies are explained.
- **No Significant Corruption Incidents:** Ideally, there have been no confirmed cases of corruption or fraud within the REDD+ program. If any allegations arose, they were investigated and resolved. An outcome indicator of success would be, for example, an auditor-general's report that raises no red flags on the REDD+ accounts, or an evaluation that finds funds have reached intended beneficiaries without diversion. Additionally, qualitative feedback: stakeholders feel the process is fair and have not observed officials abusing REDD+ for personal gain.
- **Anti-Corruption Enforcement in Action:** If any misuse of funds or corrupt practice was identified, the outcome should show that enforcement mechanisms kicked in. For example, if a local official misallocated REDD+ money, the Participant took action (legal or administrative) to correct it and prevent recurrence. *Preventing corruption* also means reducing opportunities for it – an outcome might be that the program instituted improvements like digital tracking of payments or community monitoring committees, which in turn resulted in more efficient, cleaner management (this could be captured in progress reports).
- **Enhanced Trust and Participation:** A less tangible but important outcome is that due to transparency and integrity, stakeholders trust the REDD+ program and are therefore more willing to participate. Auditors might glean this from stakeholder interviews (e.g. “We trust the funds are handled properly because we see the reports”) or increased stakeholder engagement (people are willing to invest time or co-finance because they see accountability).

Implementation Guidance

To meet Theme 2.2, jurisdictions should implement a range of anti-corruption and transparency measures:

- **Financial Management Systems:** Establish robust financial management procedures for REDD+ funds. This includes budgeting, accounting, and auditing processes consistent with international standards. Every dollar (or credit) from REDD+ should be accounted for. Utilize independent financial audits annually – these audit reports should be shared with the program's stakeholders for transparency. For benefit distribution, create clear formulas or criteria and document every disbursement, ideally in publicly accessible ledgers.
- **Anti-Corruption Risk Assessment:** Conduct a corruption risk assessment specifically for the REDD+ program. Identify where risks are highest (e.g. in selecting project areas, in contracting service providers, in disbursing benefits) and implement targeted controls. For example, risk: *elite capture of benefits* – control: involve community representatives in benefit allocation decisions and require multiple sign-offs; risk: *fraudulent reporting of emission reductions* – control: independent third-party verification and use of transparent monitoring technology.

- **Transparency & Accountability Tools:** Implement tools such as public dashboards showing REDD+ fund flows (who got funds, for what purpose, when) to allow public scrutiny. If a grievance mechanism (Theme 2.4) receives any corruption complaints, ensure they are investigated in coordination with anti-corruption authorities. Encourage civil society oversight – e.g. allow NGOs to observe REDD+ governance meetings or join oversight committees.
- **Adherence to Procurement Standards:** If REDD+ involves procurement (e.g. hiring contractors for MRV, purchasing equipment, etc.), enforce procurement rules that emphasize transparency and value-for-money. Use open tenders, publish tender results, and allow independent observers in tender committees. Keep procurement records for audit.
- **Capacity Building and Culture:** Train all personnel involved in REDD+ on ethics and anti-corruption. Develop a code of conduct for the REDD+ program that explicitly forbids bribery, nepotism, and misuse of funds, and have everyone sign it. Establishing a culture of zero-tolerance is key. Participants may also set up confidential channels for whistleblowers to report any wrongdoing (and protect those who come forward).
- **Documenting Measures:** The Participant should maintain documentation such as: anti-corruption policy documents or circulars applicable to REDD+; minutes of oversight committee or audit committee meetings; copies of audit reports (internal and external) with any findings and follow-up actions; procurement records and contract award notices; and evidence of transparency initiatives (e.g. screenshots of the fund transparency portal, community scorecards if used, etc.). These documents demonstrate the systems in place and their effectiveness.

Theme 2.3: Respect, Protect, and Fulfill Land Tenure Rights

Objective: *Ensure that the REDD+ program recognizes and secures **customary and statutory land and resource tenure rights** of Indigenous Peoples, local communities, Afro-descendant Peoples (or equivalent groups), and other stakeholders, and that REDD+ activities do not undermine these rights.*

Secure land tenure is fundamental to both safeguard social rights and to the success of REDD+ (as unclear tenure can lead to conflict or deforestation). This theme aligns with Cancun Safeguard B (transparent governance) and Safeguard C (rights of indigenous and local communities) by requiring jurisdictions to **formalize and strengthen land tenure** and avoid involuntary resettlement or displacement of people for REDD+ without consent.

Structure/Process – Expectations for Jurisdictions

Participants should have in place laws, policies and procedures to recognize, document, and secure land and resource tenure relevant to REDD+. Key expectations:

- **Legal Recognition of Tenure:** The jurisdiction's laws should recognize both **statutory tenure** (formal titles, deeds, concessions) and **customary tenure** (traditional land use rights of communities and indigenous groups) in forest areas. There should be provisions for registering communal lands, ancestral domains, or user rights. If gaps exist in national law (e.g. customary rights not formally recognized), the REDD+ program should have interim measures like agreements or moratoria on activities that could alienate customary lands.
- **Land Tenure Inventory and Mapping:** A process should exist to **identify and map out land claims** within the REDD+ accounting area. This includes determining who owns or uses land and resources in REDD+ program areas – whether it's individuals, communities, or the state – and resolving overlapping claims. Participants should produce or reference cadastral maps, community maps, or similar inventories.
- **Procedures to Secure Tenure:** If tenure is not yet secure, procedures like land titling programs, issuance of certificates, or creation of community forestry agreements should be in place or initiated. There should also be legal protection against eviction: laws or policies should prohibit forced evictions and lay out due process for any necessary relocations (aligning with international standards).
- **Resources and Institutions:** An institutional setup (e.g. a land administration agency or a task force under the REDD+ program) tasked with handling tenure issues. Adequate resources (survey teams, legal aid, etc.) should be allocated to document and strengthen tenure where REDD+ is implemented. The structure should enable communities to formally lodge claims or seek clarification of their rights as part of REDD+ planning.

Outcome – Expectations for Jurisdictions

The ultimate outcome is that **land and resource rights in REDD+ areas are recognized, mapped, and secured**, and that stakeholders retain access to and control over their lands throughout REDD+ implementation. Specific outcomes and evidence include:

- **Recognition and Security Achieved:** Public institutions have demonstrably **recognized and secured land tenure rights** in the REDD+ context/REDD+ accounting area. For example, by the time of verification, communities in REDD+ areas may have received land titles or formal

management rights to their traditional forests if they didn't have them before. If formal titles are not feasible in the short term, then at least there are binding agreements or designations (like community forest reserves) that acknowledge their rights. Auditors might see copies of land titles, certificates of customary ownership, or signed agreements between government and communities.

- **No Involuntary Relocation without FPIC:** A critical outcome is that **no REDD+ actions caused involuntary relocation or displacement of people** without their Free, Prior, and Informed Consent (FPIC). In other words, REDD+ did not force anyone off their land. If any relocation or land use restriction was necessary for a REDD+ action (for instance, declaring a protected area), records should show that affected people consented through an FPIC process and were compensated or otherwise benefited.
- **Continued Access and Use:** Outcome means that stakeholders (especially communities) continue to have **access to and use of their land and resources** as appropriate during REDD+. If restrictions on resource use were part of REDD+ (e.g. reduced timber cutting), these should have been agreed upon and alternative livelihoods provided. Evidence could be community testimonies that “we still manage our forest, just now under a conservation agreement,” indicating rights are intact, just exercised in a sustainable way.
- **Conflict Reduction:** By securing tenure, an outcome should be a reduction in land conflicts in REDD+ areas. The program should not exacerbate disputes; ideally it helps resolve pre-existing conflicts. For instance, if multiple communities had overlapping claims, through the REDD+ process they might have delineated boundaries amicably. If outcome indicators or reports show fewer disputes brought to authorities, or successful mediation cases resolved, that demonstrates respect for tenure.
- **Benefit Flows to Rightful Owners:** Another sign of respected tenure is that benefits (carbon payments, etc.) are distributed to those with rights to the land. If communities have rights, they should be receiving benefits accordingly; if government holds the land but communities have use rights, benefit-sharing agreements should reflect that. Outcomes might include evidence of communities receiving payments or support proportionate to their stewardship roles.

Implementation Guidance

Key implementation measures for Theme 2.3 include:

- **Tenure Assessment:** Early in program design, conduct a **land tenure assessment** for all areas to be included in REDD+ accounting area. This entails identifying all stakeholders with claims or dependence on the land (indigenous territories, community lands, private lands, public forests used by locals, etc.). Document these findings in a baseline report. Use participatory approaches – involve community elders, local authorities, women, and other land users to capture the full picture of land use and rights.
- **Legal Empowerment of Communities:** Where communities lack formal recognition, implement activities to secure their rights. This could be assisting them in the legal process of titling or registration of their land. If formal title is not possible in the short term, consider interim measures like Memoranda of Understanding that acknowledge the community's right to continue using and managing the land for REDD+. Provide legal aid or support from NGOs if needed to navigate the processes.
- **Integrate FPIC for Land Use Changes:** Any REDD+ action implying changes in land use or restrictions (e.g. creating a conservation zone, or changing access to a forest) must involve **Free,**

Prior, and Informed Consent (FPIC) from the indigenous peoples or local communities whose lands are affected. Ensure that this process is documented: meeting minutes, agreed terms, even video or written consent from community assemblies. If communities do not consent to a proposed activity that would displace them or curtail their fundamental land rights, the REDD+ action design should be adjusted or that action should not proceed.

- **Benefit Sharing Agreements:** Develop benefit-sharing mechanisms that reinforce land rights- in alignment with section 3.4.2. of TREES. For example, a carbon benefit-sharing agreement could explicitly recognize the community's land stewardship role and tie benefits to it, effectively serving as a contract acknowledging their rights and responsibilities on that land. This both incentivizes protection and formalizes their claim in the context of REDD+.
- **Grievance Mechanisms for Tenure Issues:** Ensure that the grievance redress mechanism (Theme 2.4) is accessible for land and resource rights issues. If someone feels their land rights are threatened or not respected by a REDD+ action, they should have recourse to raise it and get a prompt resolution (e.g. boundary clarification, stopping an encroachment, etc.).
- **Alignment with National Land Reforms:** If the country is undertaking land tenure reforms or cadastral updates nationally, integrate REDD+ areas into those efforts. For instance, if there's a national program to issue titles or demarcate indigenous land, prioritize REDD+ zones. Coordination with the land administration authority is crucial.
- **Documentation and Monitoring:** Keep a detailed record of land tenure status in the REDD+ accounting area. This might include: maps showing land ownership/use, lists of titles issued or in process, FPIC agreements signed, and records of any relocation (voluntary) that occurred. Monitor over time –as part of monitoring reports, include a section on tenure update (e.g. “X additional communities obtained legal title since last report,” or “No changes in tenure; rights maintained”).

Theme 2.4: Respect, Protect, and Fulfill Access to Justice (Grievance Redress Mechanisms)

Objective: *Ensure that all stakeholders in REDD+ have access to fair, effective, and culturally appropriate dispute resolution and grievance redress mechanisms, allowing them to raise and remedy any grievances related to REDD+ implementation (including safeguard violations or rights infringements).*

In simpler terms, this theme guarantees that if people have complaints or conflicts arising from the REDD+ program, there are processes to address them **promptly, without discrimination or prohibitive cost**, and to provide recourse or remedies. This operationalizes Cancun Safeguard B's call for effective governance by embedding rule of law and accountability at the site level.

Structure/Process – Expectations for Jurisdictions

Participants should have in place laws, policies and procedures that guarantee access to justice for stakeholders in the context of REDD+. Key structural elements include:

- **Grievance Redress Mechanisms (GRMs):** a dedicated REDD GRM is not required. The standard requires that jurisdictions have GRMs that are accessible to all stakeholders (e.g. communities, individuals, NGOs, private entities) and can be used for REDD+ related issues. It/they should cover a range of issues: from safeguard issues (e.g. if someone's rights were violated, or promised benefits not delivered) to operational problems. The GRMs should have clear procedures (how to submit a grievance, timelines for response, steps of investigation, and decision-making) and be **non-discriminatory** (open to all, including women, minorities, remote groups) and **free of charge**.
- **Culturally Appropriate Mechanisms:** For Indigenous Peoples, local or Afro-descendant communities, the mechanism should allow grievances to be raised and resolved in ways that respect their culture and access needs. This might involve community elders or traditional authorities in the process, or providing translation. The structure might include local grievance committees or focal points within communities, feeding into the larger mechanism.
- **Awareness and Capacity:** The presence of a mechanism is not enough; stakeholders must be informed about it and how to use it. The Participant should have an outreach strategy (posters, trainings, community meetings explaining the GRMs) and potentially provide support to those who might face barriers in using it (e.g. literate intermediaries to help fill forms, etc.). The mechanism's staff or committee must also be trained in fair resolution techniques (mediation, investigation, etc.), including sensitivity to gender and power dynamics.

Outcome – Expectations for Jurisdictions

The expected outcome is that **disputes and grievances related to REDD+ have been effectively addressed and remedied** through accessible mechanisms, maintaining stakeholders' trust and upholding their rights.

Evidence of outcomes includes:

- **Resolved Grievances:** Public institutions have indeed resolved disputes, grievances, or competing claims that arose, in a manner considered fair by the parties. For instance, if two communities disputed a forest boundary in a REDD+ area, the outcome might be a mediated agreement on boundaries. If an individual complained about non-payment of a benefit, the outcome might be that payment was made or an explanation given. Outcome success is measured not just by number of

grievances handled, but by **the effectiveness of outcomes** – e.g. grievances are closed with mutual agreement or appropriate corrective action, and recurrence of similar issues is minimized.

- **Remedies Provided:** In cases where rights or agreements were violated (say a community wasn't consulted properly), the outcome should show that **effective remedies** were provided. Remedies can include apologies, compensation (monetary or in-kind), policy changes, or other actions to make amends. The key is that those who suffered a loss or harm due to the program feel that the situation was corrected. So an outcome indicator could be statements from previously aggrieved parties that "yes, my issue was resolved and I'm satisfied with the outcome."
- **Non-Discriminatory Access:** Outcomes should demonstrate that vulnerable or marginalized groups were able to use the grievance mechanism when needed. For example, if women or minority members had grievances, they were heard and resolved, indicating the mechanism was not biased or inaccessible to them. Also, cost did not deter people – if someone with little means raised an issue, they could do so freely and got a fair hearing. The absence of grievances from certain groups isn't necessarily positive – it could mean they couldn't access it – so auditors will look qualitatively to see if any group with likely issues was left out.
- **Reduced Conflicts Escalation:** Ideally, because of the GRMs, fewer conflicts escalate to serious disputes or litigation. If no one had to resort to protests, external complaints to donors, or court cases, that suggests the relevant GRMs are working. If some did escalate, was it because the GRMs failed or because the issue was beyond its scope?
- **Continual Improvement:** An outcome of a well-functioning GRM is that it feeds back into program improvement. Patterns of complaints may lead to changes in program implementation (for example, multiple grievances about benefit delays could lead the program to overhaul its distribution process). Evidence of that adaptive management (like revised guidelines following grievances) shows the mechanism is not a formality but a driver of accountability.

Implementation Guidance

Steps to implement Theme 2.4 effectively include:

- **Ensure access to Grievance Redress Mechanisms:** Ensure the REDD programs allows for **multiple entry points**: community-level (where local committees or project staff can receive complaints) and program-level (a central unit that can take complaints via phone, email, or in-person).
- **Communicate and Train:** Roll out a communication plan about the GRM. Communicate the clear steps/procedure of the GRMs: acknowledgment of receipt (within X days), initial assessment, deliberation or investigation, response, and appeal process if unsatisfied. Distribute brochures in local languages. Post signs at project sites with contact info for complaints (as simple as a phone number or address). Provide training sessions for community focal points who can assist others in submitting grievances.
- **Link to Formal Justice:** Establish protocols for when to escalate issues to other authorities. For example, if a complaint alleges criminal activity (like corruption or violence), the GRM should refer it to law enforcement and not attempt to resolve solely internally. For other complex matters (like boundary disputes), the GRM might coordinate with government land dispute bodies or customary arbitration as appropriate. Document these referral pathways.
- **Record-Keeping:** Set up a **grievance log** or database. Every grievance gets an ID, date, summary, steps taken, outcome, and status (open/closed). This log will be crucial for monitoring and audit. It

should also note any demographic info (if provided) of complainants to track if diverse groups are using the system.

- **Monitoring and Feedback:** Regularly review grievance data for patterns. Are many complaints about the same issue? That indicates a systemic fix is needed. Also gauge satisfaction – possibly through follow-up surveys with complainants (did they feel heard? was the outcome fair?). Use this feedback to refine the mechanism. Many effective GRMs have an iterative process to improve responsiveness and outreach.
- **Appeals and Higher-Level Recourse:** Check if any grievances were escalated to higher authorities or even to the ART program level. If yes, see how those were handled. The resolution of escalated cases will show if the safeguard system as a whole functions. If nothing was escalated, ensure it's because issues were solved locally, not because people felt they couldn't escalate.
- **Integration with Safeguard Reporting:** The Participant's monitoring reports should mention grievance handling (summarizing number of grievances, etc.). Auditors will cross-verify the consistency between reported info and what the logs/interviews show. Discrepancies (like report says "0 grievances" but auditors find some) would need clarification.
- **Continuous Operation:** Confirm the GRM is not just on paper but operational throughout the crediting period. If the program expanded to new areas, did the mechanism cover those too? If new stakeholders (like contractors) came in, were they briefed about handling complaints? Auditors may ask if the mechanism has evolved (for example, introduced community grievance officers after seeing initial low uptake). A static mechanism in a changing program might not suffice, so adaptiveness is important.

Theme 3.1: Identification of Indigenous Peoples and Local Communities (and equivalent groups)

Objective: *Ensure that all Indigenous Peoples, local communities, Afro-descendant Peoples, and any equivalent marginalized groups potentially affected by or involved in REDD+ are identified and recognized, including those who may not be easily visible (such as uncontacted peoples or nomadic/transhumant communities).*

This is a prerequisite for effectively respecting their rights and including them in REDD+. Essentially, the REDD+ program must **know who the stakeholders are** in terms of indigenous and community presence in the forest areas. This corresponds to Cancun Safeguard C (respect for knowledge and rights of indigenous peoples and local communities) by first delineating **who** those peoples/communities are.

Structure/Process – Expectations for Jurisdictions

Participants should have in place laws, policies and procedures to **identify or enable self-identification** of all relevant indigenous and community groups in the REDD+ accounting area. Key expectations:

- **Criteria for Identification:** A clear definition or criteria is used to determine who qualifies as *Indigenous Peoples, Local Communities, Afro-descendant Peoples*, or equivalent terms nationally (could include ethnic minorities or tribal groups). This should align with international criteria (e.g. for Indigenous: distinct social/cultural identity, attachment to ancestral lands, own customs and institutions). For local communities, typically forest-dependent or traditional communities in the area. The Participant should either follow national definitions or adopt international definitions if national law is silent. Self-identification is a key principle: groups that identify themselves as indigenous or tribal should be acknowledged as such.
- **Baseline Data Gathering:** There should be a process to collect data on the presence and distribution of these groups in the REDD+ accounting area. This can involve reviewing census data, ethnographic studies, consulting indigenous peoples' organizations, and ground-truthing with local knowledge. The output is a **list of all distinct groups and communities** in the region, with info on their locations, population (if known), and any special attributes (like uncontacted or voluntarily isolated groups, who need special handling, or transhumant communities that use the area seasonally).
- **Culturally Appropriate Approach:** The process of identification should respect the perspectives of the communities. That means engaging with community leaders to validate who they are and what they call themselves. If communities have their own names and categories, use those. Avoid any approach that would impose external labels or miss groups due to bureaucratic oversight. For instance, if a semi-nomadic group isn't settled, a typical census might miss them – the process should adapt (maybe working with anthropologists or NGOs familiar with them).
- **Inclusivity in Identification:** Ensure **no group is overlooked**, especially those that are often marginalized (like pastoralists, recent migrants who depend on forests, or women's user groups within communities). While "Indigenous Peoples and Local Communities" is broad, think of all relevant sociocultural groupings. If Afro-descendant or other ethnic groups exist with similar status, include them as stakeholders in the REDD+ program. Uncontacted peoples (if any in remote forests) require identification by anthropological evidence and establishing buffer zones, etc., even though direct engagement isn't possible. The structure should acknowledge their existence and rights to remain uncontacted, which implies safeguarding their lands.

Outcome – Expectations for Jurisdictions

The outcome is that **all Indigenous Peoples and local community groups living in or using the REDD+ accounting area have been identified and recognized by public institutions**, forming the basis for inclusion in safeguards processes. Evidence of outcomes includes:

- **Complete Stakeholder List:** There is a comprehensive list (or database/map) of the indigenous and community groups in the REDD+ program area, which is **publicly available or at least available to auditors/stakeholders**.
- **Recognition by the Government:** It's not enough to list them; they should be **formally acknowledged** as stakeholders in the REDD+ program. This might be evidenced by official communications: e.g. invitation letters to those communities to participate in consultations, inclusion of indigenous representatives in REDD+ committees, or government reports (like the Summary of Information) naming those groups as part of the REDD+ program. Essentially, the government and implementing agencies demonstrate that they know these groups exist and consider them rights-holders/participants.
- **No Group Left Out of Consultations/Benefits:** As a result of proper identification, **no indigenous or local community group was omitted** from REDD+ consultations, consent processes, or benefit schemes due to ignorance of their existence. Outcomes to check: Did all identified groups get consulted? Are they all considered in benefit-sharing plans? If the program has, say, 10 indigenous communities identified, the consultation logs should show engagement with all 10. If any group was missed in initial planning but later discovered, outcome success means they were quickly integrated into the process (the mechanism was flexible to add new stakeholders once identified).
- **Cultural Mapping Outcomes:** Sometimes identification includes mapping cultural and resource use zones for each group. If undertaken, an outcome could be that **each group's traditional area is mapped and recognized** in the REDD+ planning. This can prevent future overlaps or conflicts because the program has clearly demarcated which community uses which forest area.
- **Improved Data on Communities:** As an outcome, the jurisdiction might have better demographic or socio-cultural data on these groups than before (like an updated count of community members, or documentation of their traditional knowledge). This is a positive co-benefit outcome as it supports long-term inclusion beyond REDD+. It's often noted in outcome reporting if, for example, the REDD+ readiness phase helped identify previously unrecognized tribes or gather data that's now used in broader policy.

Implementation Guidance

To implement Theme 3.1, jurisdictions should undertake:

- **Stakeholder Mapping Exercise:** Early in program design, do a thorough **stakeholder mapping** focusing on indigenous and local communities. Use multiple sources: government records (like lists of recognized indigenous territories), NGO databases, academic research, and direct field scoping. Engage anthropologists or local NGOs who have field knowledge. Go community by community in forested areas to identify who lives there or uses it. For areas with no apparent settlements, investigate if there are known nomadic routes or historical claims.
- **Validation with Communities:** Once you have a draft list of groups and their locations, **validate it with the communities themselves** and with representative bodies (like indigenous peoples' organizations or forest user associations). Ask if there are any groups missing or if the identity labels

are correct. Communities should have the chance to self-identify – for instance, they might say “We identify as People X, not just a generic local community.” Record those self-identifications accurately.

- **Government Recognition Process:** If some groups are **not officially recognized** by the government (some indigenous or minority groups might lack official status), initiate a process to recognize or at least formally acknowledge them in the context of the REDD+ program. That might involve a statement from environment or indigenous affairs ministry that for the REDD+ program, these groups are considered stakeholders with rights, even if other legal recognition is pending. In parallel, the REDD+ program can encourage steps toward formal recognition if necessary (e.g. support them in applying for official recognition or territory demarcation if that’s a process in country).
- **Regular Updates:** The identification process is not one-off. Maintain an updated register. If new information surfaces (say an uncontacted group’s presence is confirmed by a study, or a new community forms from migration), update the records and adjust engagement plans accordingly. Set a schedule to review stakeholder list every so often (e.g. annually or before each verification).
- **Sensitive Handling of Uncontacted Peoples:** If applicable, have a protocol consistent with national and international guidance (e.g. do not try to contact them, establish protective measures around their lands, etc.). Identification in that case might rely on expert advice and signals (like presence of hunting camps, etc.), and outcomes revolve around protecting their territory.
- **Documentation:** Document the identification process and results. Include who was consulted to identify groups, what sources were used, and a final list with descriptions. If there’s a national Summary of Information (SOI) on safeguards, list all groups under Safeguard C section. Also, map products: cultural/territorial maps showing group locations are very useful documentation (with sensitive data treated carefully as needed).

Theme 3.2: Respect and Protect Traditional Knowledge and Practices

Objective: *Ensure that the traditional knowledge and practices of Indigenous Peoples, local communities, and Afro-descendant Peoples (or equivalent) are respected and protected in the design and implementation of REDD+ activities.*

This means the program must not exploit or undermine their knowledge and practices, and where possible, should integrate or support them. It aligns with Cancun Safeguard C's intent (taking into account knowledge of indigenous and local communities) and is connected to international instruments like CBD Article 8(j) on traditional knowledge, and UNDRIP provisions on cultural heritage.

Structure/Process – Expectations for Jurisdictions

Participants should have in place laws, policies and procedures to **safeguard traditional knowledge and cultural practices** relevant to forests within REDD+. Key elements:

- **Legal Protections for Traditional Knowledge:** Check for any laws or regulations that recognize and protect traditional knowledge (TK) or intellectual property of indigenous and local communities. For instance, some countries have laws requiring consent and benefit-sharing if traditional knowledge is used for commercial purposes (like a national Access and Benefit-Sharing law under the CBD's Nagoya Protocol). If such frameworks exist, the REDD+ program should commit to complying with them (e.g. not disclosing sacred or sensitive knowledge without permission, not enabling biopiracy, etc.). If these laws don't exist, the Participant should adopt interim policies and/or procedures, such as a commitment that any traditional ecological knowledge (e.g. on medicinal plants, fire management, etc.) shared by communities during the REDD+ program will be used only with permission and with appropriate benefit-sharing.
- **Incorporation of Traditional Practices in REDD+:** The program structure should actively seek to **incorporate and validate traditional forest management practices** where they contribute to REDD+ goals. For example, if indigenous fire management or agroforestry practices help reduce wildfire risk or enhance carbon stocks, the REDD+ program's design should include those practices rather than override them. There might be guidelines or a task force to integrate local knowledge into technical MRV, baselines, or activity planning. This structural inclusion shows respect (valuing TK as a resource, not an obstacle).
- **Safeguards against Negative Impacts on Culture:** Procedures to ensure REDD+ actions do not inadvertently forbid or inhibit traditional practices without consent. For instance, if a community traditionally uses shifting cultivation (and it's sustainable at small scale), the REDD+ strategy should not outright ban it without providing culturally acceptable alternatives or having their agreement. Another example: sacred sites and cultural rituals in forests must be respected – REDD+ interventions (like enforcement patrols or project infrastructure) should avoid disturbing these. A process, such as a cultural impact assessment, could be required before starting activities in areas rich in cultural heritage.
- **Documentation and Consent for TK Use:** If the REDD+ program intends to use or document traditional knowledge (say to inform policy or to share lessons), there should be a protocol: only do so with the knowledge-holders' consent and ideally with benefit-sharing. E.g., if a community shares their practice of sustainably harvesting a forest product and the program publishes it in a report, ensure the community is acknowledged and that publishing doesn't harm their IP or lead to exploitation. Perhaps formal agreements (like a memorandum if the project records traditional knowledge for project design or carbon estimation) are made.

Outcome – Expectations for Jurisdictions

The outcomes should demonstrate that **traditional knowledge and practices have been respected and safeguarded throughout REDD+ implementation**. Examples of outcomes and evidence:

- **No Erosion of Traditional Practices:** The REDD+ actions did **not lead to the loss or suppression of traditional practices** important to communities. For example, if communities have traditional rotational farming or harvesting rituals, these were either left intact or incorporated into project plans, not banned without consent. Auditors would seek evidence that communities are continuing their cultural practices (maybe even strengthening them under the REDD+ program). If any practice was modified (e.g. reduced burning), it was done with community agreement and knowledge integration (like replacing it with another traditional technique or a jointly designed alternative).
- **Protection of Sacred/Important Sites:** Outcomes should show that sites of cultural significance (sacred groves, burial grounds, ritual areas) in the forests were protected from any REDD+ disturbance. If a new patrol post or project structure was built, it was sited away from sacred zones as identified by communities. Community feedback might indicate “the project respected our sacred sites – they even helped us mark and protect them.”
- **Use of Traditional Knowledge in Outcomes:** A positive outcome is when traditional knowledge has contributed to the success of REDD+ and is duly credited. For example, the program’s fire management improved because it adopted indigenous burning calendars – and as an outcome, wildfire occurrences dropped. Another example, forest regeneration was faster because communities applied their traditional seed dispersal methods. These success stories, if present, should be documented and attributed to the community’s knowledge, reflecting respect.
- **Benefit-Sharing for Knowledge Use:** If the program did leverage traditional knowledge for, say, developing an eco-tourism component or a value-added product, the outcome should show that the knowledge holders benefited. For instance, if an indigenous technique for making a forest product is used commercially via the REDD+ program, those communities should be receiving royalties or other benefits – demonstrating both respect and legal compliance with ABS (Access and Benefit Sharing) principles.
- **Community Perception of Respect:** Ultimately, an outcome is that communities *feel* their knowledge was respected. This might be gauged qualitatively – e.g. community members saying “They listened to us about how we manage the forest” Or “Our language names for animals and places were used in project materials.” Such sentiments indicate outcome success in cultural terms.

Implementation Guidance

To achieve Theme 3.2, jurisdictions can adopt the following measures:

- **Cultural Engagement Plans:** Develop a cultural heritage or traditional knowledge engagement plan as part of REDD+ action planning. This plan identifies key knowledge/practices relevant to the REDD+ action and outlines how they will be protected or used with permission. It could involve, for example, documenting traditional forest management practices (with permission) and exploring how to integrate them into the REDD+ action’s implementation (like community monitoring uses indigenous species identification skills).

- **Prior Informed Consent for Knowledge Use:** Ensure FPIC extends to the use of traditional knowledge as needed. For instance, if researchers want to study a community's plant-based knowledge for carbon-friendly livelihoods, get explicit consent and agree on benefit sharing if any commercialization. Keep records of these agreements.
- **Promote Co-Learning:** Set up forums or workshops where project scientists and local knowledge holders exchange ideas as equals. For example, in designing reforestation, combine scientific species data with elders' knowledge of local species and planting times. This co-learning approach should be part of the implementation process, and the outcomes (like species selected) should reflect both inputs. Document how traditional knowledge informed decisions – this shows respect in action.
- **Protect Knowledge Confidentiality:** Recognize that some knowledge might be sacred or confidential (e.g. certain medicinal knowledge or spiritual practices) and not meant for outsiders or public dissemination. The program should identify if such sensitive knowledge exists and make sure not to inadvertently expose it. For example, if doing participatory mapping, maybe certain sacred locations are recorded only in a confidential annex managed by the community, not on public maps.
- **Cultural Impact Monitoring:** Just as environmental and social impacts are monitored, consider monitoring cultural impacts. For example, track if any traditional festivals or practices related to forest have changed since REDD+ program start. Ideally, they remain strong or are revitalized (which sometimes happens when communities receive support for cultural revival as part of benefit programs). If any practice is declining because of the REDD+ program (e.g. youth stop learning certain skills due to new jobs), that might be unintended and could be mitigated by consciously supporting cultural transmission (like adding cultural education as part of project benefits).
- **Link to Knowledge Protection Initiatives:** If available, tie in with national or international initiatives. E.g., some countries have traditional knowledge registries. The Participant can consult such frameworks to ensure compliance and respectful use. Also, linking with the **CBD's Nagoya Protocol** obligations: if REDD+ intersects with any potential genetic resource utilization, definitely follow those ABS rules.
- **Capacity and Experts:** Have anthropologists or cultural experts on the safeguards team who can advise on respecting and integrating traditional knowledge. They can help mediate between scientific and traditional perspectives and ensure respectful documentation (if any).
- **Knowledge Exchange Agreements:** If the project facilitates knowledge exchange between communities (like one community teaching another a practice), do so in a way that respects protocols (some knowledge might not be shareable beyond certain groups). Always get community approval for such exchanges and give credit.

Theme 3.3: Respect, Protect, and Fulfill the Rights of Indigenous Peoples, Local Communities, and Afro-Descendant Peoples

Objective: *Ensure that the human rights of Indigenous Peoples, local communities, and Afro-descendant (or equivalent) peoples are respected, protected, and fulfilled throughout REDD+ implementation, consistent with international human rights standards and in conformity with those peoples' customary laws and practices.*

This is a broad safeguard theme capturing the commitment that REDD+ will uphold and advance the rights of these groups – civil, political, economic, social, and cultural rights – and specifically ensure they share in REDD+ benefits. It directly reflects Cancun Safeguard C (knowledge and rights of IP/LC) and ties into multiple international norms (UNDRIP, ILO 169, etc.).

Structure/Process – Expectations for Jurisdictions

Participants must have in place laws, policies and procedures to **guarantee and promote the rights** of these groups in the context of REDD+. Key aspects:

- **Legal Recognition of Rights:** The jurisdiction should have laws/policies acknowledging key rights of indigenous and local communities – such as rights to lands and resources (often via land tenure laws, see Theme 2.3), cultural rights (maybe via heritage protection laws), political representation rights (like seats in decision-making bodies), and basic human rights (non-discrimination, etc.). The REDD+ program should explicitly commit to adhering to these and not overriding any rights. For example, if indigenous peoples have self-governance rights in their territories by law, the REDD+ program must operate through their institutions. If such laws are absent, the Participant should follow international standards (like UNDRIP) as a matter of policy for the program.
- **Free, Prior, and Informed Consent (FPIC):** A clear **requirement for FPIC** with indigenous peoples for any REDD+ action that would impact their rights (lands, resources, livelihoods, cultural or spiritual values). This structure element might be a documented FPIC guideline or protocol that the Participant follows, even if not mandated by national law (since TREES requires it effectively).
- **Benefit-Sharing Provisions:** REDD+ program should guarantee that these communities receive equitable benefits from REDD+ (financial or otherwise). This ties to their rights to livelihoods and development. So, part of this structure/process indicator is a Benefit Sharing Plan (BSP) in alignment with section 3.4.2 of TREES. Legal backing can come from national REDD+ decrees or program rules. Ensuring benefit equity, especially gender inclusion (women's rights to benefit), is crucial – notice Theme 5.3 on social benefits addresses women, youth too, but here specifically for these groups at large.
- **Non-Discrimination and Inclusion:** There must be a commitment that the program will not discriminate against these groups and will proactively include them. If these groups historically face marginalization, the REDD+ program should have measures to level the playing field (like capacity-building so they can engage effectively). The jurisdictions could note and include training workshops, funds set aside for community-led activities, etc.

Outcome – Expectations for Jurisdictions

The outcomes should show that **the rights of IPs/LCs have been upheld and even strengthened by the REDD+ program**, and they have effectively participated in and benefited from REDD+. Outcome evidence includes:

- **No Rights Violations:** There have been no incidents where REDD+ implementation violated the rights of these peoples. For example, no community was coerced, no excessive use of force by forest guards against communities, no denial of rights to free expression or assembly about the project, etc. If any allegations arose, they were resolved (per Theme 2.4) and corrective action taken. Essentially, REDD+ did not lead to infringe on human rights (e.g. an outcome compliance means this did not happen, or if enforcement existed it was done lawfully and with community agreement like community rangers).
- **FPIC Achieved for Relevant Activities:** In outcomes, when looking at specific interventions, we see evidence that FPIC was obtained where required. For instance, if a new protected area was created on indigenous lands for REDD+, the community gave their free, prior, informed consent documented in an agreement (or they initiated it). If not consent, the REDD+ action didn't proceed or was redesigned. So outcome is communities are content with what's happening on their lands. Auditors might see signed FPIC agreements, testimonies, etc.
- **Effective Participation and Influence:** IPs and local communities have been able to influence REDD+ decisions at all relevant levels. This is evidenced by their representation in decision-making bodies, modifications to REDD+ action design based on their input, etc. Essentially, their right to self-determination and participation (UNDRIP Article 18, ICCPR Article 27 on minorities participation) is realized. For example, outcome could be “the benefit sharing plan was co-developed with indigenous representatives and reflects their priorities” – indicating their rights to decide on matters affecting them were respected.
- **Benefit Sharing Realized:** Outcomes show these communities are **receiving benefits** and improved welfare from REDD+. That is fulfilling their economic and social rights. For example, carbon payment shares delivered to community funds, community development projects (health, education) funded by REDD+ proceeds, or employment. An outcome might measure that X% of REDD+ benefits went to communities or Y number of community members got jobs/training. Also, ensure **women and vulnerable members within those communities** share in benefits (this ties to Theme 5.3 but in context, rights fulfilment includes gender equality as fundamental right).
- **Empowerment and Capacity:** A positive outcome is that through REDD+, the communities' own institutions and capacity have been strengthened to assert their rights. For instance, maybe the program helped an indigenous community map their territory and that map was used to secure a legal title (fulfilling rights). Or it supported the creation of a community forest governance committee that continues to manage resources. Essentially, outcomes that leave communities more empowered (knowledge of rights, organizational capacity) than before indicate rights are not only respected but actively promoted.

Implementation Guidance

Measures to implement Theme 3.3 effectively include:

- **Human Rights Due Diligence:** Conduct a human rights risk and impact assessment for the REDD+ program. Identify which rights (land, culture, health, etc.) could be at risk and ensure measures to mitigate any negative impact. For example, check that increased conservation enforcement won't restrict communities' subsistence unless alternatives are provided (right to food). Align this with UN guiding principles on business & human rights methodology but apply to REDD+ context.
- **Establish FPIC Protocol:** Develop a detailed **FPIC protocol** in collaboration with indigenous leaders, outlining how consent will be obtained for each phase or activity that affects them. Make sure

it includes information disclosure in appropriate languages, decision-making through their own institutions (echoing Theme 4.2), and documentation of agreements. Train project staff and government officials on FPIC practices so they know it's non-negotiable for relevant activities.

- **Inclusive Governance:** Set up governance structures for REDD+ (like steering committees, technical working groups, benefit distribution committees) that **include representatives of IP/LC**. Give them a real voice (potentially with veto in matters deeply affecting them or at least consensus decision-making in those cases). This structural inclusion helps operationalize rights (like the right to participation and to free determination of development priorities). Document their roles formally (e.g. TOR of committees state representation quotas or roles for IP/LC).
- **Legal Agreements with Communities:** Use formal agreements to embed rights. For instance, a community might sign a Benefit-Sharing Agreement with the government. In that text, incorporate language that “nothing in this agreement shall be construed as waiving the community’s rights under national/international law” and that their customary laws (listed as applicable) will be respected in implementation. For indigenous peoples, you might have “protocols of engagement” that incorporate their customs (like requiring speaking with the council of elders for any major decision).
- **Benefit-Sharing Mechanism Design:** Ensure the benefit-sharing mechanism is developed with equity and rights in mind. It should be transparent (ties to anti-corruption and info access rights), fair (non-discriminatory, e.g. doesn’t bypass women or more marginalized community members), and reflective of communities’ contributions and priorities. The process of designing it should involve communities (so that it is effectively an exercise of their right to development). Implementation of benefits should be done in partnership (perhaps communities themselves decide how to use funds, which is fulfilling their self-governance rights).
- **Capacity Building and Legal Literacy:** Invest in capacity building for communities about their rights and how to exercise them in the context of REDD+. For example, run workshops on UNDRIP, national forestry law rights, grievance filing, etc., so they are empowered to claim their rights. Also train government staff on indigenous rights.
- **Monitoring Rights Fulfilment:** Integrate indicators of rights fulfilment in monitoring. For instance, track representation of IP/LC in meetings (quantitative), track instances of rights-related grievances (hopefully zero unresolved ones), do periodic satisfaction surveys or participatory evaluations where communities can voice if they feel their rights are being respected. Use that feedback adaptively. Possibly work with human rights institutions or observers to audit the program’s rights performance.

Theme 4.1: Respect, protect, and fulfill the right of all relevant stakeholders to participate fully and effectively in the design and implementation of REDD+ activities

Objective: *Ensure that all relevant stakeholders – including indigenous peoples, local communities, women, youth, and other vulnerable groups – have the right and opportunity to participate fully and effectively in REDD+ planning, implementation, and benefit-sharing.*

This directly corresponds to Cancun Safeguard (d), which calls for the full and effective participation of stakeholders (with special emphasis on indigenous peoples and local communities) in REDD+ actions. The aim is to uphold democratic engagement and community ownership in the REDD+ program: those affected by or interested in REDD+ decisions should have a voice in shaping them. Effective participation requires not just one-off consultations, but ongoing involvement, timely access to information, and mechanisms to ensure stakeholder inputs are taken into account (and recourse if they are not). In practice, this safeguard helps build local support for REDD+ and improves outcomes by incorporating diverse knowledge and priorities.

Structure/Process – Expectations for Jurisdictions

Participants should have in place laws, policies and procedures to guarantee inclusive participation in REDD+. Key expectations include:

- **Legal/Policy Framework for Participation:** Existence of laws, policies or regulations that mandate stakeholder participation in environmental or land-use decisions. The instruments should specifically mention inclusion of marginalized groups (women, youth, minority ethnic groups) so that **no one is left out** of the process. It should also align with any broader participation rights in national law (e.g. freedom of information acts, public consultation laws) and international commitments (e.g. the country's commitments under Principle 10 of the Rio Declaration or SDG 16.7 on inclusive decision-making). Essentially, there must be a recognized *right to participate* in REDD+ for stakeholders, backed by government commitment.
- **Stakeholder Identification and Mapping:** A procedure to identify all relevant stakeholders (affected communities, indigenous groups, local authorities, NGOs, private sector, etc.). This links with Theme 3.1 (for IP/LC identification) but extends to other stakeholders like farmers' groups, women's associations, or businesses. Jurisdictions should maintain a stakeholder registry or mapping for REDD+, ensuring even less-visible groups (e.g. landless forest users, nomadic groups, youth organizations) are identified. This mapping underpins an inclusive process by defining *who* needs to be at the table.
- **Stakeholder Engagement Plan:** A documented plan or strategy for ongoing engagement of stakeholders throughout the REDD+ program. This plan should outline how information will be disclosed (formats, languages, timing), how consultations will be conducted (public meetings, focus groups, surveys, etc.), and how feedback will be integrated. It should be tailored to the context – e.g. using local languages and culturally appropriate methods – and scaled to the program's scope and impacts. The plan must also include **differentiated measures for vulnerable groups**: for instance, separate women's meetings if needed, or providing transport so remote communities can attend workshops. It should cover participation not only in initial design, but also in implementation (monitoring, evaluation) and in deciding how benefits are distributed (e.g. community representation on benefit-sharing committees).
- **Access to Information:** Procedure to ensure stakeholders have **timely access to all relevant information** in an understandable form. Transparency is a prerequisite for meaningful participation.

Jurisdictions are expected to proactively share information about the REDD+ program – such as proposed activities, social and environmental assessments, benefit-sharing plans, and progress reports – in local languages and accessible formats *before* consultations take place. For example, there might be public websites, radio announcements, or village bulletin boards with REDD+ info. The procedure should guarantee that stakeholders can obtain information easily (reflecting the principle of transparency from Safeguard (b) and in alignment with Theme 2.1 (this overlaps with Theme) In effect, the REDD+ program should operate under open information principles, so communities are well-informed and can engage from a position of knowledge.

- **Inclusive Decision-Making Procedures:** The procedure of participation must be **fully inclusive and respectful of stakeholder input**. This means using participatory methods (workshops, community dialogues, participatory rural appraisal, etc.) where people can freely express views. It also means **adapting to stakeholders’ cultural norms and schedules** – for instance, holding meetings at times and places convenient for local people (not just in capitals), and allowing community leaders to facilitate if appropriate. When engaging indigenous or traditional communities, it’s critical to follow their decision-making structures (this overlaps with Theme 4.2). For other local stakeholders, it could involve working through existing community forums or local councils. Special efforts should be made to hear from women and youth (e.g. ensuring they are invited and feel safe to speak). The jurisdiction might, for example, set a guideline that at least 30% of community meeting attendees are women, or have youth representatives in consultations. There should also be *feedback loops*: stakeholders are informed how their input influenced final decisions, which builds trust that participation is not merely token.
- **Resources and Capacity for Participation:** The jurisdiction should allocate adequate resources (human, financial, technical) to carry out meaningful stakeholder engagement. This could include a dedicated focal point within the REDD+ management unit, budget for conducting consultations in remote areas, and capacity-building programs so stakeholders can engage effectively. For instance, training community representatives in basic climate change and REDD+ concepts enables more informed dialogue. Providing small grants or stipends for stakeholder representatives to travel to meetings, or funding NGOs to facilitate community consultations, are ways to operationalize this. Without resources, participation processes often falter, so auditors will look for evidence that the program invested in outreach and consultation activities.
- **Grievance/Recourse Mechanisms:** To reinforce genuine participation, stakeholders must have a way to raise concerns if the participation process is flawed or if they feel their views were ignored. This links to Theme 2.4 (Grievance Redress). The procedure should ensure that if, say, a community was not consulted about a project that affects them, they can file a complaint and get the process corrected. Essentially, there is a check to “ensure the participation process is respected”. This might be the same grievance mechanism discussed in Theme 2.4 or a specific feedback mechanism for consultations (like evaluation forms or community monitoring committees).

Outcome – Expectations for Jurisdictions

Over time, jurisdictions must demonstrate that stakeholders *did* participate fully and effectively and that their participation influenced REDD+ outcomes. Indicators of success and evidence include:

- **Broad Stakeholder Involvement:** Records show that **all identified stakeholder groups were engaged** in the REDD+ program. For example, consultation meeting minutes, attendance sheets, or participant lists should include representatives from each key group (communities, indigenous groups, local NGOs, women’s groups, etc.). An outcome indicator could be the *number and diversity of stakeholders* participating in REDD+ meetings or decision bodies. If 95% of targeted communities have been consulted, or if multi-stakeholder steering committees exist at national or subnational

levels including civil society and community members, that's evidence of broad involvement. There should be no major stakeholder group left out of the process due to oversight or barriers. Auditors may cross-check a sample of communities or groups: each should confirm they had a chance to engage.

- **Gender and Social Inclusion in Practice:** Outcomes should show that women, youth, and other vulnerable groups have been able to participate and have their perspectives considered. For instance, meeting reports might note women's inputs or separate women's focus groups conducted. One measurable outcome might be *women's participation rate* in consultations (e.g. "40% of participants in community consultations were women" or "women chaired 2 of the 5 local REDD+ committees"). Another outcome is empowerment: e.g. testimonies from women or minority members that they felt comfortable to speak and their concerns were addressed. The program should avoid outcomes where only local elites or men dominated the process. In short, participation was **not merely formal but equitable**. If these groups have remained silent or passive, the "full and effective" criterion isn't fully met.
- **Stakeholder Influence on Decisions:** A critical outcome is that **stakeholder inputs have meaningfully shaped REDD+ decisions**. Auditors will look for concrete examples: perhaps the REDD+ strategy was revised after public consultation (and the final document acknowledges stakeholder suggestions), or a planned REDD+ activity (like a logging ban) was modified because communities raised concerns.
- **Local Ownership and Trust:** An intangible but important outcome is **increased local ownership and trust in the REDD+ program**. Communities and stakeholders should feel the program is partly "theirs" because they had a hand in shaping it. Evidence might be statements in evaluation surveys or interviews such as "We feel we are partners in this program" or high turnout in voluntary meetings (indicating interest and trust). High levels of transparency (stakeholders say "we are kept informed about REDD+") also reflect trust. These qualitative outcomes can be captured via stakeholder feedback assessments.
- **Integration into Benefit Decisions:** Since the safeguard also specifically mentions participation in decisions about **REDD+ benefit distribution**, an expected outcome is that stakeholders have actively shaped how benefits are shared and have oversight of it. Evidence could include community-benefit committees making decisions on fund use, or public validation of benefit-sharing plans by stakeholders. An outcome might be that benefit-sharing arrangements are widely accepted as fair – for example, indigenous communities confirm they agreed to the benefit rules, or women's groups report that they received a portion of benefits in accordance with decisions they took part in. Essentially, benefit-sharing should not be top-down; stakeholders' participation ensures the outcomes (who gets what benefit) are viewed as legitimate and equitable.
- **Adaptive Management Through Feedback:** Because of continuous stakeholder engagement, the program should show signs of adaptive management, i.e. adjusting and improving over time in response to stakeholder feedback. For instance, if early in implementation communities complained meetings were too technical, the program might have adapted by using more local facilitators or simplifying materials. By verification stage, auditors might see that consultation methods have evolved (perhaps more frequent village meetings or translation provided) because stakeholders indicated a need. This outcome – that stakeholder feedback loops lead to improvements – demonstrates that participation is not a one-off event but a guiding principle in implementation.

Implementation Guidance

To achieve Theme 4.1, jurisdictions can take the following steps and measures:

- **Develop a Stakeholder Engagement Plan:** create a **Stakeholder Engagement Plan (SEP)** that outlines how all relevant stakeholders will be involved. This plan should identify stakeholder groups (using the mapping from Theme 3.1 for IP/LC and expanding to other groups like private landowners, NGOs, academia, etc.), methods of engagement for each (e.g. community meetings for villages, workshops for NGOs, one-on-one meetings for key informants, online disclosure for wider public), and a timeline aligning with program milestones. For example, the SEP might schedule initial consultations for strategy design, then periodic meetings every six months during implementation, and additional meetings whenever major decisions (like allocating carbon revenues) are made. Make sure the SEP is **publicly available** so stakeholders know how and when they can participate. Build in translations and culturally appropriate formats – e.g. if literacy is low in some communities, plan for oral presentations and use of visuals rather than relying on written handouts only. The SEP becomes a roadmap ensuring engagement is systematic and not ad hoc.
- **Inform and Train Stakeholders:** Prior to consultations, implement a process of information dissemination and capacity-building. This could include simplified brochures on the REDD+ program, community radio broadcasts explaining REDD+ in local dialects, or short workshops to explain technical concepts (carbon, baselines, etc.) in lay terms. The idea is to empower stakeholders with knowledge so they can participate effectively (often called informed participation). In some cases, hiring or partnering with local NGOs or community-based organizations to do outreach can be effective, as they may be trusted intermediaries. Additionally, consider “training of trainers” – e.g. train community facilitators who can then lead local discussions. By the time formal consultations happen, stakeholders should not be hearing about REDD+ for the first time; they should come prepared with some understanding and questions. This addresses the power imbalance (government experts vs. villagers) by elevating stakeholders’ ability to engage.
- **Use Multiple Participation Channels:** Implement diverse channels for participation to reach different groups. For example, hold *community consultations* in villages (ensuring to visit remote areas, not just easily accessible ones), *thematic workshops* at the provincial or national level (on topics like gender and REDD+, or REDD+ and biodiversity, inviting subject-matter stakeholders), and establish *online platforms or feedback forms* for those who prefer written input (like NGOs or citizens who can submit comments). This multi-pronged approach acknowledges that one size doesn’t fit all. For remote or resource-poor communities, in-person dialogue is crucial (and budget for travel as needed). Also, create a mechanism for continuous input, not just set-piece meetings – e.g. a hotline or an email address where stakeholders can send suggestions or concerns at any time. By diversifying participation methods, you broaden the reach and make it easier for all to contribute in a way comfortable to them.
- **Culturally Appropriate and Gender-Sensitive Methods:** Tailor the engagement methods to be culturally appropriate. In indigenous or traditional communities, this may mean working through respected leaders or councils, observing local protocols (e.g. starting meetings with a customary ritual or meeting at a customary gathering place), and being mindful of local decision-making practices (some communities deliberate internally before giving an answer – accommodate that by not forcing immediate decisions). Provide information in local languages (use interpreters if needed). Ensure meetings are facilitated in an inclusive manner – facilitators should encourage quieter members (often women or youth in some cultures) to speak and ensure that no single faction dominates. Consider separate sessions if power dynamics require it (for instance, women-only focus groups can allow women to speak freely on issues like fuelwood use, which they might not in a mixed group). Show respect for cultural calendar – do not schedule important meetings during harvest or festivals when people are unavailable. These adjustments demonstrate respect and help foster trust, leading to more genuine participation.

- **Document Consultation Processes and Responses:** Keep thorough documentation of all stakeholder engagement activities. For each meeting or consultation: record the date, location, participants (with demographics like gender, affiliation), topics discussed, and importantly the feedback given and questions asked. Then document the program’s response or how the feedback was considered. This could be in a “consultation report” or a matrix listing stakeholder inputs and how they were addressed in the REDD+ design. Sharing back these reports with stakeholders (in an appropriate format) closes the loop and shows that their time and input was valued. For example, after a series of regional workshops on the REDD+ strategy, the government might publish a summary of comments received and indicate which suggestions were incorporated. If some suggestions were not adopted, explain why. Such documentation is also critical for auditors as evidence that due process was followed.
- **Institutionalize Ongoing Participation:** Move beyond one-off consultations by institutionalizing stakeholder participation in the governance of the REDD+ program. This can be done by establishing permanent bodies or forums that include stakeholder representatives. For instance, create a multi-stakeholder REDD+ steering committee or working group that meets regularly to guide implementation – with seats for community representatives, civil society, perhaps private sector. Likewise, at subnational levels, form local REDD+ committees or forest management committees that involve community members in day-to-day decision-making. Provide clear terms of reference that these bodies have influence (e.g. they review annual work plans or approve benefit distribution plans). This ensures participation is embedded in the program’s governance structure, not just external advisory. It also gives stakeholders a sense of responsibility and co-ownership.
- **Link Participation to Benefit-Sharing and Monitoring:** Ensure that stakeholders are not only involved in planning but also in monitoring and benefit-sharing decisions. For benefit-sharing, one practice is participatory budgeting – where communities decide how a portion of REDD+ funds are used for local projects. Provide facilitation for communities to hold their own discussions on benefit use priorities (education, healthcare, livelihoods, etc.), and then have those decisions reflected in program budgets. Similarly, involve stakeholders in monitoring the social impacts of REDD+ (did livelihoods improve, were there any issues?) through community surveys or joint field evaluations. When stakeholders see that their participation extends into implementation oversight – for example, community members helping to evaluate whether safeguards are working – it reinforces the credibility of the process. It also helps catch issues early. In essence, treat stakeholders as partners and co-implementers, not just consultees.
- **Coordinate National and Local Engagement:** For programs at subnational level, coordinate with national REDD+ participation processes (and vice versa) to avoid gaps or duplications. For instance, if a province is doing its own consultations for a subnational strategy, ensure that feeds into the national stakeholder engagement so that local voices are heard nationally. Conversely, national-level workshops should include delegates or representatives from local levels. This vertical integration prevents a situation where something is decided nationally without local input, or local processes occur in isolation. Establish channels for information flow up and down – e.g. national REDD+ civil society platforms that aggregate local concerns and bring them to policy makers. Many countries have set up REDD+ stakeholder platforms or committees at multiple levels; leveraging these ensures consistency and comprehensive coverage in participation. Enabling local community representatives to attend national policy dialogues (perhaps through federations or umbrella organizations) is a good practice.
- **Adapt and Iterate:** Finally, approach participation as an iterative process of improvement. Solicit feedback on the engagement process itself (meta-feedback). For example, ask participants at the end of a workshop: “Was this meeting useful? How could we improve next time? Did you feel all voices were heard?” Use grievance data (Theme 2.4) as well – if there are complaints like “we weren’t

informed about X,” that indicates a participatory process gap to fix. Be willing to adjust the Stakeholder Engagement Plan as the program evolves – maybe new stakeholders emerge (e.g. a new community settles in the area or a new NGO forms) or maybe initial methods aren’t reaching some groups (then try other methods). Demonstrating this learning approach will enhance stakeholder trust and lead to more effective, sustained participation throughout the REDD+ program lifecycle.

Theme 4.2: Develop adequate participatory procedures for the effective participation of Indigenous Peoples, Local Communities and Afro-descendant Peoples, or equivalent.

Objective: *Guarantee that the participation of Indigenous Peoples, local communities, Afro-descendant Peoples, and other equivalent groups in REDD+ is carried out through their own representative institutions and decision-making processes, using culturally appropriate procedures.*

In practical terms, this theme operationalizes the requirement that indigenous peoples and local communities have a special status in REDD+ participation: their rights to self-governance and consent must be respected.

The aim is to uphold their self-determination: they participate not as just another stakeholder, but in accordance with their customs and with the power to give or withhold consent for interventions on their lands. This is closely tied to international standards like UNDRIP (United Nations Declaration on the Rights of Indigenous Peoples), which enshrines the right of indigenous peoples to FPIC, and ILO 169 (if ratified). In essence, Theme 4.2 ensures that REDD+ does not override indigenous/local governance, but rather works *with* it, guaranteeing culturally appropriate engagement and consent.

Structure/Process – Expectations for Jurisdictions

Participants must have in place laws, policies and procedures to **ensure Indigenous and community participation is both effective and respectful of their autonomy**. Key elements include:

- **Recognition of Traditional Decision Structures:** The jurisdiction should formally acknowledge the decision-making structures of IPs and LCs. For instance, if indigenous communities have councils of elders, village assemblies, or other customary institutions, these should be recognized as the legitimate channels for consultation and decision-making. The Structure/Process Indicator explicitly expects participation occurs through these structures. In practice, this means the jurisdiction has laws, policies, procedures stating that when engaging an indigenous community, the REDD+ program will follow that community's own protocols (e.g. sending a request to their council, allowing internal consensus processes) rather than imposing external committee structures. If national law provides for this (some countries have legal requirements to consult via traditional authorities), that law should be cited and followed. If not in law, the REDD+ program should adopt this principle in its strategy/plan. Essentially, *who* represents the community is determined by the community, not by the government or project – be it a tribal chief, a committee elected by the community, or any other form they use.
- **FPIC Policy or Guidelines:** There must be a clear requirement and procedure for Free, Prior, and Informed Consent (FPIC) with indigenous peoples (and, where applicable, local communities) for REDD+ activities that impact them. Many countries have developed FPIC guidelines as part of their REDD+ readiness; if so, the Participant should implement those. The procedure should define *when* FPIC is required (e.g. for any activity affecting land/territory rights, causing relocation, or impacting cultural resources) and *how* FPIC is obtained. This usually involves multiple consultation rounds, documentation of consent decisions (e.g. written agreements or videos of community meetings), and involvement of independent observers in sensitive cases. The FPIC process must be **free** (no coercion or manipulation), **prior** (consent sought well before implementation and with enough lead time), **informed** (communities get all relevant information in a culturally appropriate manner), and culminate in **consent** (a clear endorsement by the community, or a refusal which must be respected) The expectation is that the Participant has something like an “FPIC Protocol” in place – that staff and partners are trained on. FPIC should not be an afterthought;

it needs to be built into project design timelines and approval processes (e.g. a project impacting an indigenous territory *cannot proceed* to implementation until evidence of FPIC is obtained).

- **Culturally Appropriate Consultation Procedures:** Beyond formal FPIC moments, all consultations with IP/LC must be **culturally appropriate**. This implies using local languages, respecting cultural norms (as touched on in Theme 4.1), and allowing communities to participate in a way that aligns with their customs. The procedures should ensure, for example, that **interpreters or cultural facilitators** are available if government staff don't speak the local language, that meetings are held in community venues, and that consultation scheduling respects things like seasonal calendars or religious events. Moreover, information should be provided in forms that resonate – perhaps oral storytelling, using radio, or visuals for communities with oral traditions. The presence of **community elders and knowledge holders** should be facilitated, as they are often key decision-makers. The expectation is that the procedure adopted principles for culturally sensitive engagement. In some cases, communities have their own engagement protocols (some indigenous groups have written FPIC protocols for outsiders) – the procedure in this case, should commit to following those. All these measures are to ensure that indigenous/local participants are comfortable and fully able to engage, setting the foundation for genuine consent.
- **Adequate Conditions for Participation:** The Safeguard wording mentions ensuring *adequate conditions* for IP/LC participation. The Structure/Process Indicator here refers to two key conditions. Firstly, providing **resources and time** for communities to consult internally. For instance, after presenting a proposal, the REDD+ program should allow the community time (maybe weeks or months as needed) to discuss among themselves according to their traditions (which might involve multiple village meetings or seeking the advice of spiritual leaders, etc.). The REDD+ program might provide logistical support for these internal discussions (like transportation for clan representatives to gather). Another condition is **capacity-building**: some communities may need support to understand technical aspects – the program could offer independent legal advice or involve indigenous NGOs to help communities analyze proposals. Also, the process should allow for *iterations* – consent is not a one-off yes/no; communities might say “yes if these conditions are met” which requires further negotiation. The structure should accommodate that iterative dialogue. In summary, “adequate conditions” means the process is not rushed, communities aren't pressured, and they have the means (info, capacity, time) to make decisions on their own terms.
- **Documentation and Verification of Consent:** The jurisdiction's procedure should require **thorough documentation of the consent process and outcomes**. This includes minutes of meetings, lists of participants (to show it was representative – ideally including women, youth, traditional authorities), copies of materials shared (to prove information was given), and the actual *consent agreement* (which could be a memorandum of understanding, community resolution, or other record of the community's decision). Often, communities will provide a signed letter or a video statement of consent; whatever form, it should be archived. Additionally, the procedure may call for **independent verification** of FPIC – for example, having a respected NGO, notary, or ombudsperson observe key meetings and attest that the process was free and fair. Some programs convene independent panels to verify that FPIC was obtained (especially to avoid later disputes).
- **Legal Support and Conflict Resolution:** Recognizing that FPIC and consultations can be complex, the Participant should have provisions for **legal or mediation support**. Communities might need legal advice to understand agreements (so providing access to independent counsel or NGO support is good practice). Also, if disagreements arise during negotiations, having a conflict resolution mechanism (like involving a neutral mediator or referring to a customary conflict-resolution method) is part of the structure. For instance, if a community is split internally on whether to consent, the program might pause and allow their customary dispute resolution to reach unity, rather than forcing a quick decision.

- **Extension to Benefit-Sharing Decisions:** The second half of the Theme 4.2 structural and process indicator mentions participation in decisions about REDD+ benefits through their structures. Thus, not only must *project* activities get consent, but also how benefits are allocated within or to communities should be decided with their own institutions. The expectation is that benefit-sharing mechanisms (discussed in Theme 3.3 and 5.3) for indigenous/local communities are designed in a culturally appropriate way. For example, if a community receives funds, the use of those funds might be decided in a community assembly per their tradition, rather than by an external committee. The REDD+ program should facilitate that by channelling benefits in a form that communities can manage (like community funds or through indigenous organizations). It's about self-determined development with the REDD+ benefits.

Outcome – Expectations for Jurisdictions

The expected outcomes are that **Indigenous Peoples and local communities participated on their own terms and that their rights and decisions were respected in REDD+ implementation**. Evidence of outcomes includes:

- **Community Consent Obtained (or Withheld) and Respected:** For any REDD+ activities affecting indigenous or community lands/rights, there should be clear outcomes in terms of FPIC. **If communities gave consent**, there will be tangible proof: signed community agreements, formal consent declarations, or resolutions by indigenous authorities. Auditors should see that those exist for, say, the establishment of a REDD+ conservation area on communal land, or for any project that restricts land use. The quality of consent matters: it should be *broad community consent*, not just one leader's signature without community endorsement. On the other hand, if a community **withheld consent** to a proposed activity, outcome compliance means that activity was either revised to meet their conditions or not implemented at all. Essentially, *no REDD+ activity that significantly impacts IP/LC proceeded against their will*. This could be evidenced by program revisions: e.g., initially planned logging reductions in a community forest were put on hold because the community didn't agree, and the program respected that. The presence of consent agreements and the absence of credible allegations of forced implementation indicate success. This outcome directly reflects the principle of FPIC: communities are content with what's happening on their lands because they agreed to it.
- **Participation via Customary Institutions:** An outcome is that indigenous and local community institutions had a decisive role in REDD+ decisions affecting them. For example, minutes might show that a council of elders approved the community's REDD+ plan, or a village assembly decided on how to use funds. If the REDD+ program set up committees, outcome evidence would show these committees included the legitimate community representatives (e.g. traditional leaders or people chosen by the community). A positive outcome is if communities say "We made decisions through our own meetings and the program respected them." Another indicator: any agreements or MOUs are co-signed by traditional authorities or community representatives, demonstrating they were the ones negotiating and agreeing, not bypassed. In cases of indigenous territories, you might see that the indigenous governing body is running the local REDD+ actions. Such outcomes show that participation was not only culturally appropriate on paper, but in reality, communities steered the process within their domain.
- **Culturally Appropriate Outcomes/No Cultural Offenses:** Because of using proper protocols, the program outcomes should include no major cultural conflicts or offenses. For instance, no sacred sites were disturbed, no culturally inappropriate actions were taken by project staff, and the communities express that their customs were honoured. While this overlaps with Theme 3.2 (traditional knowledge/culture), it's also a participation outcome: if processes were done correctly,

communities will feel respected. Evidence could be simply the absence of disputes regarding cultural insensitivity. Or conversely, if initial missteps occurred (maybe a team entered an area without permission), by outcome stage these were corrected via apology and proper FPIC thereafter. A satisfied statement from a community like “They approached us correctly through our elders and followed our ways” is a qualitative outcome showing the participation was culturally appropriate.

- **Effective Influence & Self-Determination:** Similar to Theme 3.3 outcomes, IP/LC should have had real influence on REDD+ at all relevant levels. Outcomes might show that indigenous peoples’ representatives sit on national REDD+ committees and have influenced national strategy (e.g. the national REDD+ strategy might include a chapter on indigenous peoples developed by indigenous delegates). Locally, outcome could be that a community’s land-use plan (part of REDD+) was developed by the community itself with technical support, rather than imposed. Essentially, communities can point to decisions or elements of the REDD+ program that were *theirs*. The right to self-determination (UNDRIP Article 3) means they shape their development path; a fulfilled outcome is when, for example, an indigenous community uses REDD+ benefits for a project of their choosing (like cultural center or school), not what outsiders dictated. Also, their **right to say “no”** is a crucial outcome: if a community said no to some aspect and that decision was upheld, it demonstrates respect for their self-determined choice. A track record of negotiations where sometimes the community’s position prevailed, or compromises were reached, indicates the FPIC process was genuine.
- **Grievance-Free (or Resolved) Implementation for IP/LC:** One would expect that if FPIC and proper participation occurred, there are few or no grievances from these communities about REDD+ implementation. Outcome verification includes checking that, for instance, no community has filed an official complaint to the relevant GRMs, or to the ART Secretariat claiming their rights were violated. If any issues did arise, they were addressed via the grievance mechanisms or dialogues to the satisfaction of the community (as indicated in Theme 2.4 outcomes). For example, if there was a misunderstanding about benefit-sharing, it was resolved in a culturally sensitive way through additional consultations. The absence of escalated conflicts (like protests or international campaigns by indigenous groups against the program) is a strong outcome signal that the jurisdiction managed participation and consent well. Given the history of many forest projects facing backlash when FPIC is not done, a lack of such backlash is meaningful.
- **Benefit Plans Reflect Community Decisions:** Since benefits are part of this theme, a successful outcome is that benefit-sharing outcomes for IP/LC align with what those communities decided. For instance, if a community decided that 70% of their carbon payments go to a community development fund and 30% as household dividends, the actual distribution should match that. Auditors might see community meeting minutes about benefit use and then see project financial reports showing expenditures accordingly – alignment indicates respect for their decisions. Also, benefits should be delivered in a way communities agreed (e.g. not in a form they didn’t want). Another outcome could be that communities feel the benefits are fair and contribute to their well-being (this overlaps with Theme 5.3 outcomes on social benefits). Specifically for IP/LC, they might have stipulated benefits like land titling support or cultural heritage support, and those were provided, reflecting their priorities. Essentially, the outcome is that *communities benefited on their own terms*, which reinforces that their consent was tied to certain conditions and those conditions were met.

Implementation Guidance

Steps and good practices for implementing Theme 4.2 include:

- **Develop Specific FPIC Protocols:** Work with indigenous leaders and community representatives to develop a clear FPIC protocol for the REDD+ program. This could be a stand-alone document or part of the REDD+ program guidelines, detailing each step: initial engagement, information

provision, community deliberation, decision-making, verification, and documentation. The protocol should be tailored to national context – possibly drawing on existing national FPIC guidelines (if the country has one under its national or international commitments) and on communities’ own inputs. For example, convene a workshop with indigenous organizations to outline how they want FPIC to be carried out. Elements would include how much advance notice communities need, in what format to present information (e.g. culturally appropriate media), who should be present (maybe requiring presence of traditional authorities and at least X% of adult community members for quorum), and how the community signifies consent (written resolution, etc.). Agree on this protocol with communities in advance of project roll-out. This ensures everyone knows the rules of engagement and builds trust that the program is serious about consent. Once established, train all project staff and partners on the FPIC protocol so they adhere to it rigorously (no shortcuts).

- **Engage Indigenous Organizations and Leaders Early:** Before finalizing REDD+ implementation plans, actively involve indigenous peoples’ organizations and community leaders at the earliest stages. For instance, in designing the national REDD+ strategy or the REDD+ implementation plan for TREES, set up an indigenous advisory group or include representatives in the drafting team. This early engagement is part of obtaining broad support and will inform of potential concerns upfront. Co-design strategies with them if possible – e.g. incorporate traditional knowledge and community proposals into the REDD+ activities from the beginning (this will also facilitate their consent later, as they see their ideas in the plan). Additionally, early engagement should map out the specific instances where formal FPIC will be sought. For example: “We will need community X’s FPIC to create a protected area in their territory; community Y’s FPIC for reforestation on their land,” etc., and plan timelines accordingly.
- **Allocate Time and Resources for Community Decision-Making:** When scheduling activities, build in ample time for community consultation and internal decision-making. FPIC is a process, not a one-off event. For example, if you aim to start an activity by a certain date, start the FPIC process many months earlier. Expect to visit the community multiple times: first to introduce the concept, then maybe a second meeting for detailed discussion, then leave information and allow the community to meet internally (perhaps several meetings over weeks), then a follow-up to answer questions, etc. Only after the community has had their own deliberations and indicates readiness, hold the decision meeting. Rushing this process is a common failure – avoid setting arbitrary short deadlines (“we need your decision by next week”). Provide **logistical support**: e.g. if a community is geographically dispersed, help them gather representatives together; if literacy is an issue, present info orally; if they request visiting another community that has done REDD+ to learn from them, facilitate that. By giving communities control over the pace, you respect the “prior” element of FPIC. Document these timelines in work plans so higher-ups and funders understand (to manage expectations that starting implementation takes time when FPIC is involved).
- **Ensure Information is Culturally Relevant and Complete:** For communities to give informed consent, they must **fully understand the REDD+ proposal, including potential risks and benefits**. Prepare communication materials in the local language and in forms that suit the audience (for instance, use storyboards, diagrams, or drama to explain, if those resonate better than reports). Cover all key points: What is REDD+ and how does it work? What changes or restrictions might happen (e.g. “you might no longer cut trees in area Z”)? What benefits are promised (payments, jobs, etc.) and how will they be delivered? What are the community’s responsibilities? What happens if there’s a dispute or if the project ends? Use analogies or draw on their experiences (e.g., relate REDD+ to any existing conservation initiatives they know). It’s often useful to have **independent interpreters or facilitators** (perhaps from an indigenous NGO) present information, to avoid the perception of bias. Also, allow communities to seek external advice – encourage them to consult with an indigenous federation or legal advisor if they wish. During the process, continuously check

understanding: ask community members to explain back the idea in their own words to gauge if the information is truly absorbed.

- **Negotiate in Good Faith and Accommodate Community Proposals:** FPIC is essentially a **negotiation process**. Be prepared to **adapt REDD+ actions** in response to community input in order to reach an agreement. For instance, a community might say, “We would consent if you adjust the boundary to exclude our sacred site, and if we are hired as forest guards.” The implementing agency should seriously consider and, where feasible, incorporate such conditions. Flexibility is key: maybe the timeline shifts, or additional components (like a livelihoods project) are added as part of the consent deal. Document any **conditions or agreements** that are part of consent. Also, if communities request it, put benefit-sharing or safeguard commitments in writing as part of the consent agreement (e.g. “Community consents to conservation of 500 ha, and government commits to build a school and title their land” – whatever is agreed).
- **Include Women and Youth in Community Consultations:** Even though communities have their own structures (which might be male-dominated or elder-dominated), make efforts to ensure inclusive participation within the community during the FPIC process. This might involve holding separate discussions with women’s groups or youth groups to hear their perspectives, then conveying those to the community leaders. If the community so permits, ensure women are part of the delegation or committee that discusses with the program. Practically, you could request the community to allow a portion of meeting time for women to speak or propose that two representatives from each demographic (men, women, young people) be part of negotiation meetings. Ultimately the community decides, but by encouraging inclusive practices, you help avoid intra-community grievances.
- **Document and Validate Consent Decisions:** When a community reaches a decision, formally document the outcome and have it validated. For example, if the community gives consent, prepare a Consent Agreement that states what is being consented to, any conditions, the date, and is signed (or thumb-printed) by the recognized representatives *and* perhaps a majority of community members or elders to show broad support. Alternatively, the community might produce a resolution letter. If possible, have a trusted third party witness the signing (could be a local official, NGO, or notary). Take photos or video of the consent ceremony if appropriate (some communities may allow this as evidence). In cases of refusal or non-consent, document that clearly too (e.g. minutes of meeting where community said no and why). This protects both the community and the program by providing a record. Also ensure copies of the agreement are given to the community in their language. **Validate** the consent through follow-up: perhaps the next day, project staff meet informally with different community members to confirm “do you all agree with this outcome?” – this can catch any lingering dissent that was not voiced publicly. It’s wise to have the community’s own authority structure internally validate it (e.g. the council of elders signs off that proper procedure was followed in reaching the decision). Thorough documentation and validation prevent disputes later about whether consent was actually given or who agreed to what.
- **Monitor and Honor FPIC Agreements:** After consent is obtained and project implementation begins, monitor compliance with the terms of consent. Implementation should stick to what was agreed – if the agreement said only 500 hectares would be set aside, don’t later try to expand it without new consent. If it promised jobs or benefits, ensure those are delivered as stated. It’s good practice to have periodic check-ins with the community to verify that conditions are being met and that they remain supportive. These check-ins can be informal or formal (some agreements set up a joint committee to oversee implementation). If circumstances change or new activities are proposed, remember FPIC is an ongoing principle – seek fresh consent for any substantial change not covered in the original agreement. For example, if later on the project wants to introduce a new carbon

monitoring plot on community land, even though small, it's expected to ask permission in line with FPIC spirit.

- **Utilize Independent Observation or Facilitation:** Bringing in an independent observer or facilitator for FPIC processes can add credibility. This might be a respected local NGO, a representative from a national human rights institution, or an anthropologist with knowledge of that community. They can help ensure communications are clear and also later attest that the process was fair. If trust between government and communities is low historically, this third-party role is especially helpful. The observer can write a short report on whether FPIC criteria were met. Similarly, consider South-South exchanges: having someone from another indigenous community that successfully did FPIC in a REDD+ project come and share their experience. This peer learning can ease fears and provide a relatable perspective to the community considering consent. It's part of facilitation – making the process as community-friendly as possible. Ensure the independent party is truly trusted by the community (sometimes communities suggest who they'd like to involve). This step can also protect the implementing agency – you have an external validation if later someone challenges the legitimacy of consent.
- **Plan for Non-Consent Scenarios:** Despite best efforts, it's possible a community may ultimately decide *not* to participate or to reject certain project elements. The REDD+ implementation plan should have contingency options for this scenario. For instance, if one community out of several in a REDD+ program says no to establishing a protected area, can the program adjust by creating a protected area only on consenting communities' land and excluding that community? Or if a community doesn't want cash benefits but prefers infrastructure, can the benefit plan be tailored differently for them? The program should be flexible to accommodate varying outcomes. In extreme cases, if a key community's non-consent would derail the REDD+ action, the jurisdiction must be ready to respect that and possibly forego that component. Having a plan B (like alternative locations or activities that achieve similar goals without infringing on non-consenting communities) is wise. This underscores that FPIC is taken seriously – consent cannot be presumed, and the program is prepared to respect self-determination even if it means scaling back or redesigning parts of the project.

Theme 5.1: Non-conversion of natural forests and other natural ecosystems

Objective: *Ensure that REDD+ actions are consistent with the conservation of natural forests and other natural ecosystems, and that REDD+ is not used to justify the conversion of natural forests to other land uses (such as plantations or agriculture).*

In other words, the REDD+ program must protect natural forests and biodiversity and avoid any activity that would destroy or degrade them. This objective comes directly from Cancun Safeguard (e), which mandates that REDD+ actions **not be used for the conversion of natural forests, but instead to incentivize the protection and conservation of natural forests and their ecosystem services**. The safeguard recognizes the risk that an ill-guided program might, for example, replace natural forests with fast-growing plantations under the guise of increasing carbon stocks. Thus, Theme 5.1 enshrines a “no conversion” rule and aligns REDD+ with broader forest conservation goals. It also ties into international commitments like the **NY Declaration on Forests** and SDG 15 (Life on Land) which call for ending deforestation. Essentially, the REDD+ program should contribute to **net forest conservation**: protecting existing natural forests, restoring degraded forests, and not inadvertently causing loss of natural ecosystems elsewhere.

Structure/Process – Expectations for Jurisdictions

Participants should have in place laws, policies and procedures to prevent natural forest conversion and promote forest conservation. Key expectations include:

- **Clear Definition of “Natural Forest” and Ecosystems:** The jurisdiction must define what counts as “**natural forests**” and **other natural ecosystems**, distinct from plantations or other land types. A clear, operational definition is critical to enforce no-conversion. This often involves criteria like native species composition, degree of human modification, and ecosystem function. For example, *natural forest* might be defined as a forest area composed predominantly of native tree species, with species composition and structure not significantly altered by human activities, and not established through planting. Plantations (even if woody) should be classified separately. This definition should be embedded in REDD+ policy documents or regulations, and ideally harmonized with national forest definitions (e.g. used in national forestry law or FREL/FRL setting). Essentially, without a definition, “conversion” can be loophole-ridden, so having it explicitly in relevant laws or policy is expected.
- **Legal/Policy Prohibition on Conversion in REDD+:** There should be laws, policies or directives stating that **REDD+ activities shall not cause conversion of natural forests or other natural ecosystems**. This may be contained in their national REDD+ strategy. For example, a national REDD+ strategy might say “No REDD+ activities will involve the clearing of natural forests for the establishment of plantations or other land uses.” If such a statement is not explicitly available, the Participant should demonstrate that their selection of REDD+ actions inherently avoids conversion (e.g. they focus on reducing deforestation, restoration of degraded lands, improving forest management – none of which entail purposeful forest clearance). In addition, existing **forest protection laws** can also be used to comply with this indicator: for instance, if the country has a law banning conversion of primary forests or requiring environmental impact assessments for land-use change, the REDD+ program should align with and enforce those laws in its area. Essentially, there must be a *no-net-loss of natural forests* approach built into how REDD+ is governed. If the program includes any plantation forestry components (e.g. timber plantations for livelihoods), policies must ensure these are established only on non-forest lands (e.g. degraded lands or grasslands). Auditors will expect to see that the Participant’s guiding documents commit to the conservation principle in line with Cancun Safeguard (e).

- **Spatial Identification and Baseline of Natural Forests:** A structural measure is having a **baseline map of natural forests and other critical ecosystems** in the REDD+ accounting area. Participants should map out where the remaining natural forests are (and other ecosystems like wetlands if relevant) as of the start of the program. Many countries have forest cover maps distinguishing natural forest vs. plantations (perhaps using remote sensing, satellite imagery analysis). This map is used to monitor that these areas are not being converted. It might also include classification of forests (primary, secondary natural forest, etc.). The Participant should also identify *other natural ecosystems* (the Cancun safeguard is often interpreted to include non-forest ecosystems like natural grasslands if relevant to REDD+ scope). By having these areas delineated, the program can specifically protect them. For subnational Participants, this might involve a provincial forest inventory or use of national data downscaled. **Participatory mapping** can augment this – working with communities to mark sacred forests or old-growth patches ensures fine-scale knowledge is captured. In structure terms, the program should treat these maps as reference: any project proposal or land use change is checked against whether it would affect mapped natural forests. This ties into the next point on procedures to vet activities.
- **Screening Procedures for REDD+ Activities:** Many countries have legal or policy provisions that clearly mandates against conversion of natural forests, and to ensure this jurisdiction should have a screening or approval process that checks proposed activities (including REDD+ actions) for compliance with the no-conversion rule. For example, if a REDD action encompasses tree planting, a screening criterion must be: is the planting site currently natural forest or other natural ecosystem? If yes, that action is not permitted (or must be reformulated as restoration rather than conversion). There may be a requirement that all proposed land-use changes (including under REDD+) undergo an environmental impact assessment (EIA) where any risk of conversion flags a stop. A “**conversion check**” should be ingrained in all project planning. This process might be documented in the REDD+ Strategy and/or REDD+ implementation plan: e.g., “All REDD+ actions will be assessed to ensure they do not involve conversion of natural forests to other land uses.” If any risk is identified that action is redesigned or dropped. This systematic check is a key structural/process measure to operationalize the no-conversion commitment.
- **Legal Protection and Management of Forests:** The jurisdiction should also have legal/policy provisions to **protect natural forests**- at least for the REDD+ accounting area. This could be via declaring new protected areas, strengthening enforcement in existing protected zones, or recognizing community conservation areas. Cancun Safeguard (e) says use REDD+ to incentivize protection, so Participants are expected to have measures (including REDD+ actions per se) like forest moratoria, improved forest law enforcement, or community forestry agreements that secure these forests. If the jurisdiction hasn’t already, they should consider updating land-use plans to zone remaining natural forests as conservation or sustainable management zones where conversion is not allowed. Allocating budget or programs for forest management (patrols, fire control, etc.) is part of this structure/process indicator too – ensuring that protecting forests is not just on paper but in practice. Many countries integrate REDD+ with initiatives use the **High Conservation Value (HCV) approach**, identifying high-biodiversity or high-carbon forests that must be conserved. Meeting this indicator might include listing such HCV areas and stating commitments not to convert them. Ultimately, the underlying expectation is **policy coherence**: REDD+ should reinforce, not undermine, forest conservation laws. For example, if the country has joined the Bonn Challenge or made a zero-deforestation pledge, the REDD+ program’s rules should clearly advance those commitments.
- **Monitoring System for Deforestation and Conversion:** A strong measure to implement this structural/policy indicator includes a **forest monitoring and reporting system** (likely part of the NFMS – National Forest Monitoring System) capable of detecting any deforestation or land-use change of natural forests in near-real-time. The program should use remote sensing (satellite imagery

analysis) and ground checks to monitor forest cover. By having this system, the Participant can **quickly identify if any natural forest area is being lost** within the REDD+ program boundary. The jurisdiction should define roles: which agency or team monitors, how often (e.g. annually or more frequently), and procedures when change is detected. For instance, if the monitoring system picks up an alert that a patch of forest has been cleared, what happens? Ideally, a rapid response: investigation on ground, determine cause (illegal logging, encroachment, etc.), and take action (enforcement, replanting) to prevent further loss and remedy if possible. Also, the monitoring results feed into reporting for safeguards: the Participant should report area of natural forest at start vs. current and show *no conversion*. Essentially, an MRV (Measurement, Reporting, Verification) system is in place to ensure **accountability** to the no-conversion commitment.

- **Alignment with Land-Use Planning:** The Participant’s land-use planning processes (like any land allocation, permitting, or development planning in the region) must be aligned such that **no new licenses or permits are issued that would lead to forest conversion** in the REDD+ accounting area. For example, a province participating in ART should not at the same time be licensing large-scale agriculture that clears forest – that would be contradictory. So structurally, the jurisdiction could have a directive or cross-sector committee to review and veto any such plans. If high-level plans (like a national agricultural expansion plan) foresee using forest lands, there should be a reconciliation process to avoid overlap with REDD+ conservation areas. Perhaps the REDD+ program has mapped “no-go” areas for conversion and communicated these to other ministries. The presence of a multi-agency REDD+ coordination body can help – ensuring agriculture, mining, etc., are aware that under the REDD+ commitments, certain forests are off-limits. In effect, the jurisdiction should “seal off” natural forests from conflicting land-use decisions. If necessary, this might involve compensatory measures: e.g. if not converting forest means some economic opportunity is foregone, perhaps REDD+ benefits help offset that to local stakeholders. But the bottom line is any REDD+ action in the REDD+ accounting area that would convert a natural forest area should be halted or rerouted. A clear sign of structure here would be official letters or decrees that, say, suspend new agricultural concessions in remaining natural forests (some countries have done such moratoria as part of REDD+ readiness).

Outcome – Expectations for Jurisdictions

The outcomes should demonstrate that **no natural forests or natural ecosystems have been converted or degraded as a result of REDD+**, and ideally that natural forest protection has been enhanced. Specific outcome indicators and evidence include:

- **No Reduction in Natural Forest Area Due to REDD+:** The most direct outcome is that **natural forest area remains stable or increases** over the program period, and no instances of conversion to non-forest land uses occurred in the REDD+ accounting area. Auditors will look at forest cover data: if at baseline there were X hectares of natural forest, at verification those X (or more) are still intact (minus any allowable natural losses). Especially, there should be **zero cases of intentional conversion** (e.g. clearing forest to establish a plantation or other activity under the REDD+ program). If some deforestation did happen (due to illegal activity or external factors), the Participant should show it was not part of the REDD+ strategy and ideally that they responded to counter it. In outcome terms, *public institutions implemented REDD+ without converting forests*. If, for example, new plantations were established, outcome evidence must show they were on non-forest lands (degraded land, pastures, etc.). A quantitative outcome indicator might be “Hectares of natural forest converted: 0” as reported. Auditors may cross-verify by sampling a few areas: e.g., if they know a plantation project happened, they’ll check the before/after land cover. The expected result is always that no natural forest was lost. In fact, because REDD+ aims to reduce deforestation, an ideal outcome is **reduced deforestation rates** compared to baseline. So not only did REDD+ not cause

conversion, it actively *prevented* conversion that would have happened without the program (reflected in emission reductions).

- **Natural Forests Under Improved Protection/Management:** An outcome of successful implementation is that **natural forests are better protected or managed** than before. This could be evidenced by new protected areas declared, increased patrolling efforts, community guardianship programs, or legal protections enacted during the program. For example, if a certain expanse of forest was previously unprotected and seeing encroachment, the REDD+ program might have helped designate it as a conservation area or community forest with secure management – outcome evidence: that forest is now under a protection regime and encroachment has stopped. Another sign: **no new encroachment or plantations** inside natural forests. If earlier, some conversion for agriculture was happening, maybe outcome is that it halted because of alternatives provided (like intensifying agriculture outside forests). Reports or remote sensing might show stable forest boundaries with no new clearings along the edges (where previously forest frontier was receding). Also, biodiversity indicators can reflect this: for instance, wildlife returning or fewer signs of logging. This theme overlaps with biodiversity (Theme 5.2) but specifically on forest cover: one can point to **areas that were at risk of deforestation now safeguarded**. The outcome might be qualitative: statements like “Government reports zero illegal logging incidents in REDD+ accounting area in the past year, as opposed to several before, indicating improved protection.” The overarching narrative should be that **REDD+ drove a conservation outcome** – not just avoided harm, but actively secured forests.
- **No REDD+-driven Plantation Replacing Forest:** Auditors will check that any tree planting or agricultural intensification promoted by REDD+ did **not come at the expense of natural forests**. The outcome confirmation is that **all REDD+ afforestation/ reforestation occurred on non-forest lands** (e.g. degraded lands, shrublands, ex-agricultural land) and **no natural forests were cleared to “make space”** for presumably higher carbon systems. For example, if the program includes an agroforestry component, outcome evidence should show it was implemented on farmers’ fields or degraded land, not by clearing existing forest to plant fruit trees. Outcome can be demonstrated by maps: showing new plantations (if any) overlay with prior land cover classified as non-forest. Or by statistics: e.g. “0 ha of natural forest converted to plantation; all 1,000 ha of new plantations were on grassland areas.” Essentially, **no perverse incentives** played out where someone might cut forest to then get benefits for planting trees (the program should have explicitly forbidden that, and outcome confirms it didn’t happen).
- **Maintenance of Ecosystem Services:** As Cancun (e) also mentions ecosystem services, an outcome is that **ecosystem services from natural forests are maintained or enhanced**. This can be inferred from the forest cover stability – intact forests continue to provide water regulation, soil protection, pollination, etc. Some programs might monitor specific services: for example, stable river flow in a watershed because forests weren’t cut. Or communities reporting that after REDD+ they still have access to forest products and environmental benefits because the forest wasn’t diminished (in fact maybe improved). If any baseline data on ecosystem services exist (e.g. water quality, incidence of erosion), outcome should ideally show no deterioration. This outcome is often qualitative but important to note – not only are the forests there, but their *function* is preserved, which was a safeguard intent (“conservation of... ecosystem services”).
- **Reduced Deforestation Leakage (Spatially):** We want to see that conservation in the REDD+ accounting area did not simply push deforestation to other areas (this is directly addressed in Safeguard (g) Theme 7.1, but also relevant here as a reality check of forest conservation). A positive outcome is if overall deforestation in the jurisdiction or country decreased, not just inside the program boundary. But specifically for theme 5.1: within the accounting area, no internal leakage pockets appear. If, say, one zone’s deforestation dropped but another zone’s rose, auditors will investigate if any REDD+ action inadvertently caused that. The ideal outcome is **uniform or**

targeted protection so that such displacement didn't occur (or was minimal and addressed). Essentially, forest conservation under the program should be **additional and comprehensive** rather than shifting problems around. The Participant might provide analysis showing deforestation rates in surrounding regions also went down or at least did not spike because of REDD+ (that analysis pertains more to Theme 7.1, but it's relevant to confirm the integrity of forest conservation outcome).

- **High Conservation Value (HCV) Forests Preserved:** If applicable, any identified **high conservation value or primary forests remain intact**. Outcome evidence could highlight that primary forests (those never logged or of high biodiversity) saw zero loss. Some programs measure forest degradation too – an outcome could be that **forest degradation (e.g. from logging or fire) was reduced** in natural forests, not just outright deforestation. For example, if previously there was selective logging in natural forests, the program might have curbed illegal logging, so forests are healthier (this overlaps with improved management mentioned above).

In summary, the outcome is a *net positive or at least no negative impact* on natural forests. REDD+ implementation led to **no instances of the safeguard being violated (no conversion)** and ideally a demonstrable conservation success (like reduced deforestation rate by X% against baseline, number of hectares of forest that would have been lost but weren't).

Implementation Guidance

To meet Theme 5.1, jurisdictions should implement practical measures such as:

- **Enforce “No Conversion” from Day One:** Make it clear to all REDD+ implementing entities (government agencies, project developers, communities) that **clearing natural forests is off-limits**. Issue a **policy note or directive** at program outset: e.g., “All REDD+ activities must avoid any conversion or degradation of natural forests; any proposal involving clearing or replacing natural ecosystems will be rejected.” Communicate this also to communities and local governments so everyone knows the ground rule. This may involve training local project managers on identifying natural forests vs. degraded land so they don't accidentally plan an activity in the wrong area. If the jurisdiction has a lot of secondary forests or degraded forests, clarify what is allowed (e.g. restoration and enrichment planting *within* forests is fine, but not clearing them outright).
- **Promote Reforestation on Degraded Lands:** Direct the REDD+ program's tree planting or forestry enhancements towards **degraded lands or non-forest lands** to both boost carbon stocks and adhere to no-conversion. This means identifying areas such as deforested scrublands, abandoned agricultural fields, or degraded secondary forest land with low canopy cover, as priority sites for reforestation or agroforestry. By doing this, you **create carbon sinks without harming existing forests**. For instance, if communities want to establish fruit tree orchards as part of livelihoods, encourage doing so on **idle lands** rather than clearing any bush or forest. Provide incentives or technical support for using degraded lands (they may need more preparation or enrichment to be arable or plantable – incorporate that in project design). This approach also yields co-benefits: restoring degraded lands can reduce pressure on natural forests by providing alternate resources (fuelwood plantations on degraded lands can spare natural forest wood). Document success stories: e.g., “The project planted 1000 ha of trees on former pasture – turning unproductive land into carbon sequestering agroforests, with no encroachment on natural forests.” These examples reinforce the viability of avoiding conversion while still increasing forest cover.
- **Implement Strong Forest Protection Measures:** As part of REDD+ implementation, allocate effort and resources to **actively protect existing natural forests**. This could involve establishing or strengthening forest patrols (community rangers or forest guards) to deter illegal logging or

encroachment. Introduce or support community-based forest monitoring where local people report any unauthorized activities. Technology-aided monitoring can be used too: e.g., use satellite alert systems and send out response teams when alerts show possible clearing. If the area is large, prioritize hotspots of past deforestation for intensive monitoring. The REDD+ program might fund new guard posts, boundary demarcation (putting clear markers or signs indicating protected status), and awareness campaigns in local communities about the value of keeping the forest intact (to build local constituency for conservation). Where possible, involve law enforcement and forest authorities to crack down on outside actors (illegal timber traders, land grabbers). If part of the REDD+ strategy is giving communities user rights or payments for protecting forests, ensure those contracts clearly forbid them from clearing the forest (which they likely do, as conditionality). Essentially, treat natural forests as *zero-tolerance zones for clearance* and operationalize that with boots on the ground and eyes in the sky. Track performance: e.g., “no new deforestation fronts emerged in protected blocks A, B, C after patrols were instituted.”

- **Address Drivers of Deforestation to Prevent Conversion:** Work on the underlying **drivers of deforestation** so that there’s less pressure to convert forests. For example, if shifting agriculture by communities was a driver, implement agroforestry or intensification programs that allow them to increase yields on existing farmland and not clear new forest (coupled with community agreements not to expand farming into forest). If illegal logging was a driver, alternative livelihood programs for loggers or tighter enforcement and market controls (like banning illegal timber trade) can remove that pressure. If plantation agriculture (e.g. oil palm or soy) is a big driver, coordinate with agricultural authorities to perhaps zone such plantations on degraded lands and enforce a ban on forest clearing for new plantations (some countries have palm oil no-deforestation policies – integrate those). **Essentially, by reducing demand for forest conversion, you uphold the safeguard.** Depending on the drivers, some concrete actions can help uphold this safeguard, such as: develop a land-use plan that clearly allocates land for agriculture expansion away from natural forests, implement a moratorium on certain commodities in forested regions, introduce efficient cookstoves or woodlots for fuel so that communities don’t resort to unsustainable wood harvesting that degrades forests (thus preventing gradual conversion). Many REDD+ programs include such driver-addressing components; tie them explicitly to safeguarding forests. Monitoring driver indicators (like agricultural yield increases, reduced illegal logging volume) can be used to show these interventions likely prevented conversion that would have happened absent REDD+.
- **Leverage Incentives for Forest Conservation:** Use the carrot as well as the stick – **incentivize communities and landholders to conserve natural forests.** REDD+ performance-based payments themselves are one incentive (if the program is structured to share carbon revenue or benefits for keeping forests). Make sure those incentives are felt locally. For example, set up a benefit-sharing mechanism where villages that successfully protect their forest patches for a year get a community reward. Or support sustainable enterprises (NTFP harvesting, ecotourism) that give economic value to standing forests. The idea is to make forests worth more alive than converted. If communities see tangible benefits (jobs as rangers, payouts, or new infrastructure) linked to forest conservation, they are less likely to clear for short-term gain. Performance contracts can be established: e.g., community conservation agreements that specify actions and benefits. By implementing these under REDD+, jurisdictions align local incentives with the no-conversion safeguard. Publicize these arrangements so that it’s widely understood that protecting forest is rewarded whereas clearing it forfeits benefits. This socio-economic approach is crucial because enforcement alone may not stop all conversion – providing alternatives and rewards completes the strategy.
- **Regular Safeguard Monitoring and Rapid Response:** Integrate a **safeguard monitoring system** that specifically tracks any sign of forest conversion and triggers a **rapid response** protocol. For instance, set thresholds: “If more than 1 hectare of natural forest loss is detected in any quarter, an investigation will be launched within X days.” Establish a Task Force or assign the REDD+

Safeguards coordinator/officer to handle these. They would verify the cause of loss (was it a fire, illegal clearing, etc.) and coordinate appropriate action (law enforcement, community mediation, replanting). Document each incident and response. Over time, the presence of this mechanism will deter would-be converters because they know it will be spotted and addressed. Also, it provides transparency: you can report, “Two minor incidents of illegal clearing (totalling 5 ha) occurred; both were detected and stopped, with reforestation underway on those 5 ha and offenders penalized.” That level of detail shows a functioning safeguard system. This ties in with Theme 7.1 (reversals and displacement risk management) – essentially treating any forest loss as a “reverse” that must be corrected or accounted for. Additionally, incorporate community reporting: empower local people to alert authorities if they witness clearing. Perhaps a hotline or community monitoring app could be part of it. Ensuring no incident goes unaddressed is key to maintaining the no-conversion norm.

- **Harmonize with Commodity and Land-Use Initiatives:** If the country or jurisdiction is involved in broader initiatives like zero-deforestation supply chains (for palm oil, cocoa, beef, etc.), **harmonize REDD+ efforts with those.** For instance, if companies have committed to no conversion for their sourcing, partner with them to enforce that on the ground. REDD+ could provide monitoring data to help companies exclude any deforestation from their operations. Conversely, leverage company presence to support community livelihoods that don’t involve deforestation (CSR programs or certification premiums). Alignment of public (REDD+) and private (sustainability commitments) strategies can create a unified front against conversion. Use these alignments as an implementation tactic: e.g., adopt the same cutoff dates or definitions as commodity standards for deforestation (if a palm oil company says no clearing of forest after 2018, ensure REDD+ likewise uses 2018 baseline for no new clearing – which it does inherently, but making it explicit helps collaborations).

Theme 5.2: Protect natural forests and other natural ecosystems, biological diversity, and ecosystem services and enhance environmental benefits

Objective: *Ensure that REDD+ implementation **protects biological diversity and ecosystem services**, and actively promotes the **conservation of natural forests and other ecosystems** beyond just carbon benefits. In practice, this means REDD+ actions should avoid harm to biodiversity (no adverse impacts on threatened species or sensitive habitats) and should ideally enhance environmental co-benefits like watershed protection, soil conservation, and climate resilience.*

This theme expands on Cancun Safeguard (e) by emphasizing the **conservation of biological diversity and ecosystem services** and not just preventing conversion.

The goal is to align REDD+ with the objectives of the Convention on Biological Diversity (CBD) – conserving biodiversity and sustainably using ecosystem components – as well as ensuring that REDD+ generates “other environmental benefits” as noted in Cancun. In other words, beyond carbon emission reductions, REDD+ should yield positive outcomes for wildlife, flora, and ecological processes. This theme also resonates with international calls for nature-based solutions that address climate change while bolstering biodiversity (e.g., the post-2020 Global Biodiversity Framework’s integration with climate action).

Structure/Process – Expectations for Jurisdictions

Participants should have in place laws, policies and procedures to integrate **biodiversity and ecosystem service considerations** into REDD+ planning and have measures to safeguard and enhance these values. Key expectations include:

- **Biodiversity Assessment and Baseline:** The jurisdiction should have conducted or compiled a **biodiversity assessment** of the REDD+ program accounting area, identifying key species (especially endangered or endemic ones), critical habitats, and high conservation value areas. A baseline of biodiversity conditions – e.g., lists of species present, conservation status, and any known pressures – is expected. This might be part of the national REDD+ readiness studies or an Environmental and Social Impact Assessment. For instance, mapping of **High Conservation Value (HCV) forests** or **Key Biodiversity Areas (KBAs)** within the jurisdiction provides a spatial guide to where special care is needed. If the country has a National Biodiversity Strategy and Action Plan (NBSAP), the REDD+ strategy/plan should reference it and align with its priorities (e.g., protecting certain ecoregions or species). Essentially, biodiversity should be **recognized in the REDD+ planning** – not treated as incidental. The presence of a biodiversity baseline allows later monitoring of impacts.
- **Integration of Biodiversity into REDD+ Strategy:** The REDD+ strategy or REDD+ implementation plan should explicitly include **goals or actions for biodiversity conservation**. This could manifest as strategic objectives like “conserve intact forest habitats of high biodiversity” or specific policies like “no REDD+ activity will be undertaken in protected areas unless it strengthens their protection”. There might be **co-benefit targets** (e.g., number of hectares of critical habitat maintained or number of endangered species populations benefiting). The structure expects that REDD+ is not solely carbon-driven; it should incorporate biodiversity safeguards such as requiring an environmental impact screen for any intervention that could affect wildlife. If the strategy includes reforestation, it should prefer **native species and ecological restoration** rather than monocultures, for example. If enrichment planting is done, guidelines should ensure it doesn’t reduce biodiversity (e.g., don’t introduce invasive exotics). In sum, biodiversity objectives are mainstreamed in REDD+

program design – possibly via multi-sector coordination (like involving wildlife departments or environmental ministries in REDD+ planning).

- **Protection of Critical Habitats:** Jurisdictions must have measures to **protect critical habitats** (areas essential for endangered species or high ecological value) within the REDD+ program area. Practically, this means if, say, an important orangutan habitat or bird nesting ground lies in the forest, the REDD+ program will prioritize its preservation. If any REDD+ action is near a critical habitat, the jurisdiction should have clear procedures to enforce *mitigation hierarchies*: avoid impacts first, if unavoidable, minimize and mitigate, and as a last resort offset (though in general, avoid is key). The Participant might have identified **High Conservation Value 1-4 areas** (which cover species diversity, ecosystems, etc.) and pledged not to negatively affect them. The structural expectation is robust enough that one could say: *the REDD+ program treats biodiversity-rich areas as no-go zones for harmful activities and actively works to keep them healthy.*
- **Environmental Impact Assessment (EIA) for REDD+ Actions:** There should be a process to **screen and assess environmental impacts** of REDD+ interventions, especially those that might affect biodiversity. Many REDD+ actions (like patrolling forests, community agroforestry) have low negative impact, but some (like ecotourism facilities) could disturb wildlife if not planned well. Jurisdictions requiring an **Environmental and Social Impact Assessment (ESIA)** or similar review for any significant on-the-ground activities is expected to meet this indicator. For instance, if the program planned to build fire control access roads or dams for peatland rewetting, an EIA should evaluate potential biodiversity effects and propose mitigation (wildlife crossings, timing construction outside breeding seasons, etc.). Even things like extensive replanting could warrant ecological assessment to ensure species mix and densities align with ecosystem restoration best practices. In practice, the Participant might apply the existing national EIA regulations for relevant REDD+ actions.
- **Monitoring of Biodiversity and Ecosystem Co-Benefits:** Jurisdictions would be expected to have in place **monitoring biodiversity and ecosystem service indicators** throughout REDD+ implementation. While not as formal or rigorous as carbon MRV, there should be some system: perhaps periodic surveys of indicator species, community reporting on wildlife sightings or resource availability, or remote sensing of forest cover quality (like fragmentation indices as a proxy for habitat integrity). The Participant might have identified a few **key indicators**— e.g., population trends of flagship species (orangutan nests, tiger camera trap rates, bird diversity indices), or condition of ecosystems (water quality in forest streams, extent of intact wetlands). Integration with existing national biodiversity monitoring (if any) is helpful. For example, if the country does regular wildlife censuses or has an alert system for human-wildlife conflict, the program could use that data to gauge if REDD+ is helping or harming. Additionally, **ecosystem service monitoring** might include measuring flow in rivers for watershed services or tracking harvests of non-timber forest products by communities to ensure they're sustained or improved. The Jurisdiction should assign responsibility: maybe the wildlife department or academic partners are engaged to do biodiversity monitoring in REDD+ zones. The existence of a **Biodiversity Monitoring Plan** (even basic) would be ideal. If none exists, auditors might raise it as a gap to address, because it's hard to demonstrate protection without monitoring.
- **Sustainable Management of Forests:** If REDD+ involves any **forest management or utilization**, it should be done sustainably per safeguard requirements. For instance, if part of REDD+ is promoting sustainable community logging or harvesting of forest products, the jurisdiction should have **sustainable forest management (SFM) guidelines** (possibly referencing things like FSC standards or national codes) that ensure biodiversity is not significantly harmed (e.g., retention of seed trees, protecting riparian zones, limiting harvest rates, etc.). Under Cancun (c), REDD+ is explicitly not just conservation but also “and their ecosystem services” implying sustainable use where appropriate.

So, an expectation under this indicator is any utilization sub-component has an associated management plan that safeguards regeneration and species diversity. If grazing or agroforestry is allowed in forests, guidelines should prevent overuse. This falls under environment management frameworks. If the jurisdiction has **certified forest areas or community forestry** programs, tying those into REDD+ is good: for instance, only carbon credits from areas managed to high standards (no clear-cuts, maintaining habitat complexity). Having a policy like “REDD+ will adhere to Sustainable Forest Management principles (as per national law or int’l best practice)” is a relevant structural commitment.

Outcome – Expectations for Jurisdictions

The outcomes should show that **REDD+ implementation has had no negative impacts on biodiversity, and preferably that it has contributed positively to conservation.** Key outcomes and evidence include:

- **No Significant Harm to Biodiversity:** There have been **no reports or evidence of biodiversity loss or ecosystem degradation caused by REDD+ activities.** For example, no species have been driven to decline or extirpation due to the program, no critical habitats have been damaged, and no invasive species were introduced. If environmental impact monitoring was done, it should show that populations of key wildlife are stable or increasing, not decreasing. For instance, if the program operates in tiger habitat, one might expect poaching to have reduced due to better patrolling, hence tiger numbers are stable or slightly up – that’s a positive outcome. If any negative incidents occurred (say, a controlled burning for fuel reduction got out of hand and affected more forest than intended), the outcome should be that it was minor, mitigated, and did not lead to long-term biodiversity loss. Essentially, **the REDD+ program did not undermine the natural ecosystem health;** it maintained it. Auditors will look for any “collateral damage” – finding none (or minimal, promptly corrected) is a mark of success.
- **Conservation of High-Value Areas:** Outcomes should show that **areas of high biodiversity value remained protected or even got enhanced protection.** For example, if the program encompassed a national park or KBA, outcome is that the park’s integrity was upheld (perhaps even improved with more staffing). One might cite that “forest cover in critical elephant corridors remained continuous with no new fragmentation” or “the nesting success of a key bird species improved after REDD+ reduced logging disturbances.” Qualitative evidence could be testimonies like park rangers saying illegal activities are down, or community members noting more wildlife sightings as hunting pressure dropped. If new protected areas were created or expanded as part of REDD+, that’s a concrete outcome – e.g., “50,000 ha of previously unprotected primary forest now designated as a conservation reserve, safeguarding numerous species.” That clearly ties REDD+ to a biodiversity gain. Another outcome metric could be **avoided biodiversity loss:** if baseline predicted that X habitat would be lost absent REDD+, and now it’s not, you effectively saved that habitat and all species within. Some programs quantify co-benefit gains (like number of IUCN Red List species benefiting from the program), which would be an outcome to highlight if available.
- **Maintenance/Improvement of Ecosystem Services:** Outcomes should indicate that **key ecosystem services have been maintained or enhanced** thanks to REDD+. For instance, if watershed protection was a goal, measurable outcomes might be stable dry-season water flow in streams or reduced sedimentation (communities downstream may report cleaner water or fewer floods). If pollination services are relevant (like forests supporting bees for crops), perhaps local farmers see consistent yields, implying pollinators are doing fine. While these links can be anecdotal, some programs do monitor things like water quality or soil erosion rates. An improvement example: “Since slash-and-burn practices reduced under REDD+, incidents of damaging wildfires dropped by 60%, improving overall forest soil moisture and reducing haze.” Or “Mangrove conservation under

REDD+ led to increased fish nursery habitat – local fish catch volumes have risen modestly.” These kinds of data or observations show the broader environmental benefits being realized.

- **Diverse Native Species Use in Reforestation:** If reforestation or enrichment planting was done, the outcome should be that **native species and diversity were prioritized**, leading to more heterogeneous forests rather than monocultures. Evidence: planting records showing a mix of indigenous tree species (vs. just exotics), or biodiversity surveys in planted areas showing return of multiple native flora and fauna (e.g., “regenerated areas now see natural regeneration of 20 additional plant species and use by wildlife like deer and birds”). If the program explicitly aimed to restore ecosystems (not just tree cover), an outcome might be that “X hectares of degraded forest now show improved structure and species composition closer to natural forest,” an indicator of success. Conversely, an absence of negative outcome: no sign that any planting scheme became invasive or reduced local genetic diversity. For example, sometimes fast-growing exotics can invade; here the outcome should be that didn’t happen (partly because likely none were used, per guidance).
- **Synergy with Protected Areas & Species Recovery:** Perhaps due to REDD+, **existing protected areas are better resourced and effective**, yielding outcomes like increased wildlife populations. If REDD+ channelled funds to national parks, an outcome could be, say, “patrol coverage in Park Y increased by 50%, and recent wildlife surveys indicate stabilizing populations of key species that were previously declining.” Or “the program facilitated a community conservation area where an endangered primate has its habitat; since establishment, no hunting incidents recorded, and the primate population has shown first signs of increase.” These outcomes tie directly to biodiversity conservation success stories attributable to REDD+. They may not have quantitative rigor if not thoroughly monitored, but even case studies or anecdotes can illustrate the trend. At minimum, **no worsening of conservation status** of critical areas or species in the REDD+ zone is expected, which is itself a positive given global trends.
- **Stakeholder Perceptions of Environmental Benefits:** Another outcome is that **local stakeholders perceive and appreciate environmental co-benefits** of REDD+. Communities might report that “the forest is healthier” or “we’ve noticed more birds or wild animals now that we’re protecting the forest.” These qualitative outcomes are often gathered in participatory monitoring or feedback sessions. They demonstrate that REDD+ is delivering tangible ecosystem benefits recognized on the ground, which also helps sustain support. So far, outcomes should be largely positive or neutral on these aspects, and any negatives minor and mitigated.

Implementation Guidance

To achieve Theme 5.2, jurisdictions should implement measures such as:

- **Align REDD+ with National Biodiversity Strategy:** Ensure that the REDD+ program explicitly supports the country’s **National Biodiversity Strategy and Action Plan (NBSAP)** or similar frameworks. In practical terms, map REDD+ interventions against NBSAP targets – for example, if the NBSAP aims to increase protected area coverage to 17% by protecting under-represented ecoregions, use REDD+ finance or projects to help create protected areas in those ecoregions (especially forested ones). Or if NBSAP calls for species conservation plans (say for elephants or orangutans), integrate those into REDD+ by focusing activities on key habitats of those species. **Institutionalize collaboration:** have biodiversity experts involved in REDD+ planning (e.g., on technical working groups). By aligning, you avoid siloed efforts – the climate team and biodiversity team work in tandem. For instance, if forest carbon plots are set up, maybe concurrently set up biodiversity monitoring plots nearby, leveraging field efforts for both carbon and biodiversity monitoring. Or during REDD+ stakeholder consultations, include topics about wildlife and

ecosystem services to gather local knowledge on biodiversity (communities can identify culturally important species or areas to prioritize). Essentially, treat REDD+ as a tool to *implement biodiversity policy* in forest areas. This will guide the selection of project sites (e.g., prioritize high-biodiversity forests for REDD+ conservation, which typically also have high carbon so it's win-win). Document these linkages – e.g., in REDD+ strategy say “this contributes to Aichi Target X or GBF Target Y.” That way, implementers constantly keep biodiversity in scope.

- **Develop and Enforce Wildlife Protection Measures:** As part of REDD+, ramp up **anti-poaching and wildlife protection** efforts in the project areas. Many threats to biodiversity (especially charismatic megafauna) come from poaching or illegal wildlife trade, which might not directly be addressed by carbon-focused actions. Recognizing this, allocate some resources to **wildlife rangers, community wildlife monitoring, and awareness campaigns**. For example, train community members as “forest guardians” not only to check deforestation but also to report snares or illegal hunting. Coordinate with wildlife authorities to conduct patrols focusing on key species’ habitats. If REDD+ provides performance payments to communities, include conditions about protecting wildlife (some agreements have clauses like no hunting of endangered species). Introduce alternative protein or income sources if bushmeat hunting is an issue – e.g., assist communities in livestock rearing or fish ponds to reduce reliance on hunting. Conduct **awareness workshops** on the importance of biodiversity and laws protecting it, as part of REDD+ community engagement. Also, if human-wildlife conflict arises (a possible side effect of increased wildlife due to conservation), have plans in place: e.g., crop protection techniques, compensation schemes – being proactive prevents backlash against conservation. By implementing these measures, the program ensures it’s not just preserving trees, but also the fauna that lives in them.
- **Use Native and Diverse Species for Reforestation:** In any tree planting or forest restoration activity, emphasize **native species and high diversity planting**. Develop or consult a list of native tree species for each forest type (with input from botanists or local knowledge). Instead of monoculture, design mixed-species planting schemes that mimic natural forest structure. For example, if restoring a degraded rainforest patch, plant a mix of pioneer natives (for quick canopy) along with slower-growing climax species, fruit-bearing trees for wildlife, etc., aiming for tens of species if possible. Avoid exotic or invasive species – if an exotic is considered (perhaps for quick erosion control or economic reason), carefully evaluate its invasive risk and have a phase-out plan once natives establish. If communities desire certain species for livelihood (like rubber or fruit trees), integrate them in an agroforestry design around core conservation areas, not replacing native forest in core zones. **Collect seeds from local forests** to maintain genetic stock adapted to the area; set up community nurseries focusing on indigenous seedlings. Provide training to planters on planting techniques that enhance survival and growth of a variety of species. Over time, this yields a more resilient forest that supports more biodiversity. Document the planting plans: e.g., how many species and seedlings of each were planted – showing it’s not a single-species approach. Possibly engage ecologists to guide these restoration efforts – maybe partner with a university to design scientifically-sound restoration plots (some REDD+ programs have experimental plots to test what species mix works best). This ensures restoration is *restorative* for the ecosystem, not just adding biomass. And as outcome, one can measure that e.g. after 5 years, natural regeneration of other species is happening under the planted ones, etc.
- **Establish Conservation Zones and Buffer Zones:** Within relevant REDD+ program areas, implement **land-use zoning** that explicitly sets aside areas for strict conservation and others for sustainable use, to manage human impact on biodiversity. For instance, identify the core intact forests or critical habitats and designate them as “no disturbance” zones (except maybe controlled ecotourism). Surround those with buffer zones where limited sustainable activities (like selective logging, NTFP collection, agroforestry) are allowed under management plans. Mark these zones on maps and communicate them to communities and enforcement personnel. Use REDD+ incentives to

encourage compliance: e.g., communities agree not to farm/hunt in core zones and get benefits in return (like intensification support on lands outside). In community forests, create microzones – e.g., “this valley is a sacred grove, no cutting; that ridge is for fuelwood, regulated cutting.” These finer plans ensure biodiversity refuges remain undisturbed. They mirror the **protected area buffer concept**: protecting inside and managing edge zones to reduce pressure. If the REDD+ program area doesn’t have formal protected areas, the REDD+ program can create de facto ones through community agreements or local ordinances. If formal protected areas exist, work to strengthen their buffer zones via community projects to reduce park-people conflicts. Use **geospatial tools** to plan these zones, overlapping biodiversity maps and community use maps to find solutions. Implementation could involve demarcating boundaries on the ground (signboards, boundary markers) and raising awareness: “beyond this river is conservation area – no agriculture beyond here.” By physically and institutionally zoning, you help concentrate human use where it’s less damaging and keep core habitats intact.

- **Promote Sustainable Livelihoods that Reduce Pressure:** Introduce and support **sustainable livelihood activities** that both provide economic benefits and rely on maintaining healthy ecosystems, thereby incentivizing biodiversity protection. Examples: eco-tourism (wildlife viewing tours, homestays for birdwatchers), sustainable harvesting of non-timber forest products (honey, medicinal plants, rattan) under management plans, or value-added processing of such products to increase income without increasing harvest quantity. Also, **forest-friendly agriculture** practices: shade-grown coffee or cocoa under native trees can encourage keeping forest cover and provides habitat. Aquaculture or improved fisheries management can take pressure off over-hunting of wildlife. Payment for Ecosystem Services (PES) schemes beyond carbon – e.g., water utilities paying communities to maintain upland forests for water quality – can be instituted. The idea is to tie local benefits to conservation outcomes. If people earn from intact forest (tourism jobs, sustainable harvest fees, PES), they become stewards. Provide technical training and possibly micro-grants or market linkages to get these enterprises running. For example, train villagers as para-guides for a community forest that has unique wildlife; help them form an association and market tourism. Or assist in certifying a product (like sustainably harvested wild honey) so it fetches a premium price. These activities appear more under social co-benefits, but they also directly help biodiversity by **creating economic reliance on conservation success**. Monitor uptake and success of such livelihoods – if alternative incomes grow, one can correlate that with reduced hunting or deforestation. Essentially, solve the “why might people harm biodiversity” problem by giving them other opportunities. This is often key: without addressing subsistence or income needs, pure enforcement may fail in the long run.
- **Monitor and Share Biodiversity Results:** Set up a **biodiversity monitoring program** (even if modest) and share the results with stakeholders and decision-makers to reinforce the value of safeguarding biodiversity. For example, involve community members or local students in wildlife monitoring (camera traps, bird counts, etc.) and have them present findings at community meetings or in reports. When communities see, for example, that “we recorded 2 more hornbill nests this year,” it builds pride and buy-in that their efforts are yielding outcomes. Similarly, sharing with national policymakers that “the REDD+ area has become a refuge for Species X and Y” can attract further support or funding (maybe leveraging species-focused programs). Use simple indicators that are meaningful locally – e.g., number of fish in streams via simple catch surveys or presence of pollinators in farms (like farmers notice more bees). Train community “eco-guards” not just in patrol but also basic ecological data collection (some REDD+ initiatives equip communities with smartphone apps to record wildlife sightings). Then **publicize success stories**: e.g., a brochure or local radio segment: “Our forest now has elephants coming back – a sign of a healthy forest, thanks to collective protection.” This not only helps maintain community motivation but also can garner external recognition (maybe an award or media coverage) that further incentivizes maintaining high standards. Moreover, such data can feed into national reporting for CBD or SDGs, showing how climate funds can deliver biodiversity benefits – a powerful narrative internationally.

- **Adaptive Management for Biodiversity:** Employ an **adaptive management approach**: if monitoring or feedback indicates any negative trends for biodiversity, adjust REDD+ actions and associated measures to address them. For example, if it's observed that a particular species is declining because even a low level of offtake is unsustainable, tighten restrictions or provide substitutes. Or if human-wildlife conflict emerges (e.g., more elephants mean more crop raids), implement measures like crop guarding or chili fences to mitigate conflicts, preventing retaliatory harm to wildlife or souring community attitudes. If some planted species in restoration aren't doing well or perhaps attracting pests, switch them out for more suitable natives. Adaptation might also mean scaling up things that work: if camera trapping finds a previously unknown population of a rare animal in part of the forest, maybe concentrate more patrols there or propose making it a strict conservation zone. Essentially, **use the information gleaned to fine-tune actions**. This shows a commitment to continuous improvement in safeguarding biodiversity.

Theme 5.3: Enhancement of Social Benefits

Objective: *Ensure that REDD+ implementation delivers tangible social benefits and an equitable distribution of REDD+ benefits, with specific inclusion of women, youth, and other vulnerable groups.*

This safeguard theme corresponds to Cancun Safeguard (e), which goes beyond a “do no harm” approach and calls for actively “enhancing other social and environmental benefits” from REDD+ actions. In practice, this means REDD+ programs should not only avoid negative social impacts but also contribute positively to poverty reduction, livelihood improvement, and social well-being in forest communities. The Paris Agreement reinforces this intent by urging Parties to respect and promote human rights, the rights of indigenous peoples, gender equality, women’s empowerment, and intergenerational equity in all climate actions.

Theme 5.3’s objective is therefore to leverage REDD+ as a vehicle for “doing good” on social fronts – improving the lives of forest-dependent people and delivering co-benefits such as better incomes, education, health, and empowerment – while ensuring that these benefits are shared inclusively among all stakeholder groups (especially those traditionally marginalized).

Structure/Process – Expectations for Jurisdictions

Participants should have in place laws, policies and procedures **to identify, enhance, and share REDD+ benefits**. Key expectations include:

- **Policy Commitment to Co-Benefits:** Clear policy statements or program objectives that REDD+ strategies aim to deliver social benefits (e.g. improved local livelihoods). For instance, the national REDD+ strategy should explicitly mention goals like poverty reduction in forest communities, or gender empowerment as part of REDD+ implementation. This shows a top-level commitment to go beyond carbon.
- **Benefit Sharing Mechanisms:** Established **mechanisms for equitable benefit-sharing** of REDD+ proceeds or benefits with indigenous peoples, local communities, and other stakeholders. This could be a benefit-sharing plan or fund that allocates a portion of carbon revenue to community projects, or policies ensuring communities gain improved services (health, education, infrastructure) as a result of REDD+. The structure should define *who* is eligible for benefits, *how* benefits are calculated and distributed, and include measures to ensure transparency and participation in these decisions (e.g. community committees or legal agreements for benefit sharing).

The plan should cover both **monetary benefits** (e.g. REDD+ revenue shares, grants, performance bonuses) and **non-monetary benefits** (e.g. community projects, land tenure security, capacity-building, improved services), reflecting a comprehensive approach to social enhancement. It is important that the BSM/BSP is developed **through a participatory process**, identifying the needs and priorities of different groups (women, youth, indigenous peoples, local communities, etc.) so that benefits are aligned with local development aspirations.

- **Integration with Development Plans:** Processes to integrate REDD+ actions with broader **sustainable development and conservation programs**. REDD+ is not a standalone effort – it is coordinated with national or subnational development plans (e.g. poverty alleviation programs). For example, if a jurisdiction has a rural development or green growth strategy, REDD+ interventions should be aligned so that they contribute to those socio-economic goals (like job creation or improved natural resource management). Evidence may include MoUs or coordination committees

between the REDD+ program and agencies for rural development, agriculture, or social welfare to ensure benefits are delivered in tandem.

- **Monitoring and Reporting Systems:** A system to **monitor, measure, and report on non-carbon benefits** over time. Jurisdictions should be developing indicators for key social benefits (e.g. number of households with improved income from REDD+ activities) and have a plan or baseline to track these. The presence of surveys, or periodic social impact assessments would indicate the jurisdiction is structurally prepared to assess outcomes in this theme.

Outcome – Expectations for Jurisdictions

Over time, jurisdictions need to show **tangible positive outcomes for people** resulting from REDD+. Auditors should find evidence that REDD+ implementation is *in fact* delivering the promised benefits (or well on its way to doing so). Key outcomes and indicators include:

- **Improved Livelihoods and Well-Being:** Demonstrable enhancements in the socio-economic conditions of communities participating in or affected by REDD+. For example, records or case studies showing increased income levels from sustainable forest-based enterprises, new employment opportunities (forest monitoring crews, rangers, ecotourism guides, etc.), or improved access to resources (e.g. community forestry agreements granting communities more control and benefits from forests). Social outcome indicators could include the number of community projects funded by REDD+ benefits, surveys of participant households showing reduced poverty levels or food insecurity, or testimonies from community members about improved quality of life.
- **Benefit Distribution and Community Satisfaction:** Outcomes should show that benefits are not only generated but **distributed equitably**. Auditors could check if the intended beneficiaries actually received the benefits promised. For example, if the plan was to share carbon revenues, have funds been disbursed to communities or local development projects? Are there tangible outputs like new schools, clinics, or community facilities built using REDD+ funds? Stakeholder interviews can reveal whether local people feel they are better off thanks to the REDD+ program. A high level of community support or satisfaction (documented through surveys or grievance mechanisms with few complaints) is a qualitative outcome indicating the enhancement of social well-being.
- **Institutionalization of Co-Benefits:** A longer-term outcome is that the **principle of enhancing benefits becomes embedded** in how the jurisdiction manages forests. This might be evidenced by new laws or policies adopted to reinforce social and environmental goals (for example, a law establishing that a share of REDD+ proceeds must go to local communities, or integration of REDD+ benefit targets into the national development indicators). The presence of sustained funding streams (like trust funds or budget allocations) for community forestry, conservation incentives, or similar programs beyond the initial REDD+ finance period would indicate the outcomes are being sustained and scaled up.

Implementation Guidance

To effectively implement Theme 5.3, jurisdictions should take proactive steps to design and document their programs for **maximum social benefits**:

- **Identify and Prioritize Social Benefits Early:** During REDD+ planning (e.g. the REDD+ strategy or REDD+ implementation plan), conduct assessments or participatory planning to **identify potential social benefits** and those that are highest priority locally. For instance, some communities may prioritize livelihood improvements (such as agroforestry training, NTFP marketing, or jobs),

while others may prioritize ecosystem services (like reliable water supply from forest protection). Jurisdictions can use tools like social impact assessments, gender analysis, and biodiversity significance mapping to pinpoint opportunities. Document these assessments and show how their findings shape the choice of REDD+ Policies and Measures.

- **Design Benefit-Sharing and Incentive Mechanisms:** Establish clear **benefit-sharing arrangements** to redistribute REDD+ benefits in a fair and transparent way. For example, a jurisdiction could set up a benefit-sharing plan where a percentage of carbon credit revenue goes to local community funds, or provide performance-based incentives (like payments for ecosystem services) to villages that successfully reduce deforestation. Provide guidance on how benefits will reach women and marginalized groups (e.g. dedicated livelihood programs for women, or ensuring equitable representation in decision-making about fund use). Implementation may involve legal agreements (e.g. benefit-sharing contracts with communities or local governments) and establishing financial management capacity (such as community-run funds) – auditors will look for evidence of these.
- **Leverage Direct vs. Enabling Actions:** Recognize how **direct interventions** and **enabling measures** can both enhance social benefits, in different ways, and implement complementary approaches. For **direct REDD+ interventions** (like specific conservation projects, reforestation, or community forest management initiatives), build in components that directly benefit local people – e.g. a reforestation project could hire community members and share revenue from fruit or timber production, or a protected area project might include community ecotourism enterprises. For **enabling actions** (such as policy reforms or land tenure clarification), emphasize the social/environmental benefits of those reforms – e.g. a new land tenure law can secure indigenous community lands (social benefit) and thereby encourage communities to invest in forest stewardship (environmental benefit). When documenting enabling measures, explicitly describe their social benefit rationale.
- **Institutional Coordination for Benefits:** Set up **coordination mechanisms between REDD+ programs and other government agencies or initiatives** responsible for social and environmental programs. Collaboration is key to amplifying benefits. For instance, coordinate with the Ministry of Social Development or rural development programs to channel REDD+ funds into local development projects (avoiding duplication and ensuring consistency with national poverty alleviation efforts). Similarly, coordinate with wildlife or biodiversity authorities to align REDD+ with biodiversity conservation targets (perhaps co-managing conservation areas or sharing data). Regular inter-sectoral meetings or a multi-stakeholder committee that includes social development experts can help steer REDD+ toward social benefit delivery. Document these coordination efforts (TORs of committees, meeting minutes, joint plans) to show a structured process for integrating multiple objectives.
- **Monitoring, Evaluation and Adaptive Management:** Implement a plan for **monitoring social benefits** and use adaptive management to enhance them over time. This involves defining indicators, establishing baselines (e.g. initial community income levels), and then periodic data collection to gauge progress. Importantly, if monitoring finds certain benefits are not being realized as expected (for example, if a livelihood program isn't yet improving incomes, or if a conservation measure isn't benefiting biodiversity), the program should adapt – perhaps by reallocating resources, adjusting strategies, or consulting stakeholders for solutions. Showing this feedback loop in implementation (e.g. “Year 2 review showed uneven benefit distribution, so criteria were adjusted in Year 3”) is a strong sign of a robust approach under Theme 5.3.

Theme 6.1: Reversals

Objective: *Ensure that the **emission reductions and other gains achieved by REDD+ are not temporary** – they should be maintained over the long term, with mechanisms in place to prevent or address any “reversal” (loss of carbon stocks after initial gains).*

This theme corresponds to Cancun Safeguard (f), which requires “**actions to address the risks of reversals**”, i.e. to guarantee the permanence of REDD+ results.

In practice, this means a jurisdiction’s REDD+ program must be designed and implemented in a way that forest carbon sinks remain intact and protected against future threats (like illegal logging resurgences, policy rollbacks, or natural disturbances). The objective is to give confidence that climate benefits are **durable** – that forests protected or restored through REDD+ won’t simply be cleared a few years later.

Process – Expectations for Jurisdictions

Participants should have in place procedures **to assess and mitigate reversal risks**, and to respond if reversals occur. Key expectations include:

- **Reversal Risk Assessment:** A systematic assessment of risks that could cause future emissions increases (carbon stock loss) in the program area. Is expected that Participant to have identified the drivers and events that might lead to a reversal of REDD+ gains. This could be documented in the REDD+ implementation plan or a standalone risk assessment report. It should cover both anthropogenic risks (e.g. return of deforestation due to agricultural expansion, illegal logging, infrastructure development, loss of political support or enforcement capacity) and natural risks (fires, pests, storms exacerbated by climate change). The assessment should also evaluate the magnitude and likelihood of these risks. For example, a jurisdiction might categorize areas by fire susceptibility or highlight policy risks like an upcoming logging concession auction. This forms the basis for planning mitigation actions.
- **Permanence Measures and Buffering: Institutional and technical measures to ensure permanence**, often including the use of buffer reserves or contingency strategies. Under ART TREES, jurisdictions contribute a portion of their credited emission reductions to a collective buffer pool as insurance against future reversals. The jurisdiction accepts and has accounted for this requirement (e.g. evidence in the documentation that X% of credits are set aside as per the TREES risk assessment). Beyond the buffer, jurisdictions should have *domestic* permanence policies: for instance, a policy that any subprogram or project must commit to long-term maintenance of forests (often 20+ years), or legal arrangements such as conservation easements, long-term forest leases, or designating areas as permanent forest estates. The presence of an **enforcement mechanism or agreement that outlasts the crediting period** (like a 30-year community conservation agreement or a protected area designation) is a strong structural indicator.
- **Mitigation Strategies for Identified Risks:** For each major identified risk, there should be **specific strategies or processes in place to mitigate it**– evidence of concrete actions planned or underway: e.g. a fire management plan (with budgets, fire brigades, early warning systems) to address wildfire risk; alternative livelihood or crop intensification programs to reduce the risk of agricultural rebound deforestation; strong legal enforcement provisions to prevent illegal logging resurgence (e.g. anti-encroachment patrols, stiff penalties codified in law). Essentially, the jurisdiction’s REDD+ implementation plan or framework should integrate these risk mitigation actions. The expectation is that risk mitigation isn’t an afterthought but part of the design (consistent with the theme text that

risk of reversals is *integrated in design, implementation and periodic assessments* of REDD+ measures.

- **Monitoring and Early Warning Systems: A National Forest Monitoring System (NFMS) or equivalent** process must be in place to detect any reversals (i.e. significant forest loss or emission spikes) in a timely manner. This means the jurisdiction should have remote sensing and field surveillance capacities covering the REDD+ area year-over-year. Jurisdictions are expected to have an operational MRV (Measurement, Reporting, Verification) system that not only measures annual emissions but is also capable of alerting authorities to sudden forest cover changes. The process expectation is that if an area that was forest (and contributing to credits) starts getting deforested, the system flags it and triggers a response. Documents like a description of the NFMS, examples of monitoring reports, or protocols for handling detected deforestation will demonstrate compliance with this indicator.
- **Contingency and Response Plans:** Linked to monitoring, there should be **established protocols for responding to detected reversals**. Jurisdiction are expected to have a **reversal management plan** – for example, a plan that if deforestation increases beyond a certain threshold or a significant reversal event (like a large fire) occurs, the government will take defined actions: e.g. mobilize enforcement, engage communities to replant, draw from emergency funds, or adjust policies. The jurisdiction might have in place an inter-agency task force for reversals or predefined roles (who does what if a reversal is identified). Additionally, the Participant should understand the ART requirements for reporting reversals: e.g. immediate notification to the ART Secretariat and the process to have buffer credits cancelled. Having these procedures written down (perhaps in the monitoring plan or national REDD+ registry procedures) will be a sign of readiness.

Implementation Guidance

To meet Theme 6.1, jurisdictions should embed **permanence provisions and risk management practices** throughout REDD+ program design and execution:

- **Conduct a Thorough Risk Analysis:** Begin by **identifying drivers of potential reversals** and assessing their likelihood. Jurisdictions can use tools like scenario planning or existing frameworks to score and categorize risks. Typical risks to consider: changes in commodity prices (could drive deforestation back up), population or resettlement pressures, governance changes (e.g. election leading to reduced enforcement), project longevity issues (community fatigue or loss of funding), and natural disturbances. Document this analysis in the REDD+ implementation plan and/or safeguard summaries of information report. Clarity in understanding the risk landscape is the foundation for all other guidance steps.
- **Integrate Risk Mitigation into REDD+ Plans:** For each key risk, **build in mitigation measures** as part of the REDD+ implementation plan. This could entail policy actions (e.g. if agricultural expansion is a risk, implement a policy that restricts land conversion and promotes yield intensification on existing farmland), community measures (if loss of community support is a risk, ensure robust benefit-sharing as per Theme 5.3 to keep communities committed long-term), and technical measures (if fire is a risk, allocate budget for firefighting capacity and early warning systems). Make these measures explicit in program documentation. *Example:* If “weak enforcement” is a risk, the program might allocate part of REDD+ revenue to hire and train additional forest rangers or empower local forest user groups with enforcement authority – and note this as a safeguard action under permanence. By linking each risk to a concrete action (and responsible entity), the jurisdiction shows a proactive stance. Notably, many **underlying safeguards** help mitigate reversal risk: clarifying land tenure (Theme 2.3) reduces future conflict-driven deforestation, providing alternative livelihoods (Theme 5.3) reduces odds that communities revert to illegal logging, strong

stakeholder engagement (Theme 4) builds local support to prevent backsliding. Jurisdictions should highlight these synergies – indeed, best practice literature notes that measures like land tenure security, sustainable livelihoods, and good governance *greatly lower* the risk of reversals.

- **Establish Long-Term Protection Instruments:** Wherever feasible, use **long-term or permanent legal instruments** to lock in the conservation status of forests. This might involve gazetting relevant REDD+ program, areas as national parks, reserves, or other protected areas (with legal protection status), or if community lands, establishing community conservation agreements of long duration (e.g. 20-year conservation contracts with renewal options). Another tool is conservation easements or covenants in law that bind the land to forest conservation even if ownership changes. By doing this, the jurisdiction reduces the chance that future political or economic shifts will open those forests to exploitation. In implementation, this means working with legal authorities early to identify which forests can be upgraded to stronger protection. Also, aligning REDD+ with long-term national goals (for instance, incorporating REDD+ results into the country's Nationally Determined Contribution and treating them as commitments to maintain) can create an external incentive to not reverse gains. Document any **legal designations or agreements** achieved – e.g. copies of decrees establishing protected areas or signed community pacts – as evidence of this step.
- **Pooled Buffer and Insurance Mechanisms: Participate fully in ART's buffer pool** and consider supplemental insurance mechanisms for extra assurance. Under TREES, the buffer contribution is non-negotiable, but jurisdictions can go further: for example, they might maintain a *national buffer reserve* (credits or funds they set aside beyond ART's requirement) for their own comfort. Additionally, explore innovative insurance schemes – some countries have looked into forest insurance that pays out in case of a catastrophic reversal (like a huge wildfire). As best practice, clearly communicate to stakeholders that not all credits are for sale – some are reserved for permanence – to manage expectations. In sum, use the buffer not just as an accounting formality but integrate it into the national carbon accounting such that any reversal triggers the pre-agreed response of cancelling credits, as per TREES rules. This aligned approach with ART is a cornerstone of international best practice.
- **Develop a Reversal Response Plan:** Create a step-by-step **Reversal Response Plan** that outlines what happens if a significant reversal is detected. This plan might specify: how the area of loss will be identified and secured (e.g. immediate dispatch of enforcement to stop ongoing deforestation), how stakeholders will be engaged (perhaps an emergency meeting with community leaders or relevant agencies to address underlying causes), and how restoration or remediation will occur (like replanting trees, or expanding efforts in other areas to compensate). It should also cover the process of reporting to ART and cancelling buffer credits (with roles assigned, e.g. which office prepares the report to ART). Practically, this plan can be an annex in the REDD+ implementation plan or part of the national REDD+ registry operating procedures. By having this blueprint, the jurisdiction can react swiftly and systematically.
- **Continuous Improvement and Periodic Review:** Implement a process for **periodic review of reversal risks and mitigation effectiveness**. Over a 5-year crediting period or at each verification cycle, the jurisdiction should revisit its risk assessment: Have new risks emerged (e.g. new infrastructure plans in the region)? Have previous risks diminished or heightened? Also evaluate whether mitigation measures are working – for instance, is the fire prevention effort actually reducing fires? – and adjust accordingly. This creates a feedback loop ensuring the permanence strategy stays relevant. In practice, this could mean updating the risk section in each Monitoring Report submitted or producing a brief “safeguard progress report” mid-way through a crediting period. Document any changes made as a result of these reviews – it shows learning and improvement.

Theme 7.1: Displacement

Objective: *Ensure that REDD+ efforts do not simply shift deforestation or emissions from one location to another – i.e. to minimize leakage or displacement of emissions. The aim is that emission reductions achieved within the REDD+ program aren't negated by increases in emissions outside the program boundaries as an unintended consequence.*

This theme corresponds to Cancun Safeguard (g), which calls for “actions to reduce displacement of emissions”

In practical terms, a jurisdiction must design REDD+ policies and measures such that they address the drivers of deforestation holistically rather than pushing the problem to other forests. For a national program covering all forests, internal leakage is less an issue (since all emissions are counted), but displacement could still occur across borders or between sectors, so vigilance is needed. For subnational programs, this safeguard is critical: if one state or province reduces deforestation, the pressure might move to another region not under REDD+ unless preventive steps are taken. The objective aligns with the principle of **environmental integrity** in carbon accounting – emission reductions should be *real* and not offset by hidden increases elsewhere.

Process – Expectations for Jurisdictions

Jurisdictions must show they have **considered and put in place procedures and measures to prevent or minimize emissions displacement** to areas outside their accounting boundary. Expectations are:

- **Leakage Risk Assessment:** Similar to reversals, a **risk assessment for potential displacement** should be undertaken. This involves identifying *where* and *how* deforestation drivers might relocate if they are curbed in the REDD+ area. The assessment should also consider **market leakage** – if the jurisdiction reduces timber or crop output to save forests, will increased demand elsewhere cause suppliers to step up production (potentially via deforestation) in other regions or countries? Auditors expect to see documentation of such analysis, perhaps in a section of the REDD+ implementation plan. It might include maps of high-risk leakage “hotspots” just outside the program boundary or statistics on commodity production shifts.
- **Scope and Boundary Choices:** A key measure to minimize leakage is the **definition of the program’s geographic and sectoral scope**. Jurisdictions should set boundaries that reduce leakage risk – for instance, covering an entire ecological region or administrative unit rather than a patchwork. TREES encourages as large an area as feasible (national or large subnational) and classifies leakage risk by the share of national forest included. Additionally, **sectoral scope** matters: if measures only target certain drivers (e.g. stopping illegal logging but not addressing agricultural clearing), leakage might occur via the unattended drivers. Jurisdictions need processes to include all major deforestation drivers in their strategy to avoid displacement from one driver to another.
- **Policies to Address Displacement Drivers Nationally: Institutional mechanisms or policies that reach beyond the REDD+ area** to tackle deforestation drivers elsewhere. For example, if a province implements strict forest protection, the national government might concurrently implement a policy to increase agricultural yields nationwide so that demand for new cropland doesn’t simply shift to other provinces. Or a logging ban in one region could be paired with tighter control of logging permits in other regions. Auditors will expect to see that the jurisdiction has engaged the national level (if subnational) or neighboring jurisdictions in developing complementary measures. This can be evidenced by policy documents – e.g., a national moratorium on new forest conversion that applies countrywide, or inter-provincial agreements/MoUs where provinces collectively commit to preventing shifting cultivation from moving among them. In short, a **framework for coordinated**

action is a structural indicator that leakage is being addressed not just locally but at the scale of the leakage risk.

- **Monitoring and Accounting for Leakage:** There should be a **system to detect and account for any displacement of deforestation**. This ties into the NFMS as well – the jurisdiction (especially if subnational) should be monitoring forest change *outside* the REDD+ boundary in the rest of the country. TREES requires a leakage deduction based on area covered and detection of any actual increase in emissions outside is part of the safeguard expectation. Auditors expect the Participant to have defined *how* they will quantify leakage. A clear process would be: national monitoring indicates whether deforestation increased outside – if yes, investigate causes and report accordingly. The presence of a national MRV covering all regions (not just the accounting area) is a strong structural sign.

Implementation Guidance

To fulfil Theme 7.1, jurisdictions should incorporate **leakage prevention strategies at every stage of REDD+ planning and execution:**

- **Broaden the Scope Whenever Feasible:** The simplest way to reduce leakage is to **increase the geographic scope of accounting**. Jurisdictions are encouraged to move toward **national-scale accounting** as soon as possible (consistent with ART’s encouragement for full national implementation by 2030). In practical steps, this might mean setting a timeline to include additional provinces or remaining forest areas. While a subnational program is underway, start capacity-building in other regions, harmonize MRV methods nationally, and create a pathway for expansion (this could be documented in the REDD+ strategy’s future steps). In the interim, design the subnational boundary to naturally reduce leakage: e.g. use ecological or administrative boundaries that contain deforestation drivers. Also, consider **all forest types** – if the program focuses only on, say, dense forests, drivers might shift to woodlands or peatlands; so try to include those in accounting or at least monitor them. Essentially, cast the net wide so there are fewer places for leakage to go.
- **Address Drivers at Their Source:** When planning REDD+ interventions, aim to **neutralize the underlying driver** rather than just displace it. For each deforestation driver identified, ask “If we restrict it here, how do we ensure the demand or behavior behind it is managed so it doesn’t pop up elsewhere?”. Guidance examples: If illegal logging is a driver, strengthen timber legality enforcement nationwide (not just in the REDD+ area) – e.g. implement a timber tracking system or a ban on illegal timber trade across the country. If subsistence agriculture is a driver, perhaps a national program to intensify agriculture or provide alternative livelihoods in all rural areas is needed, not just those in the program area. By tackling the root causes (market demand, lack of livelihoods, governance gaps) broadly, there’s less spillover.
- **Regional Cooperation:** Leakage often doesn’t respect political boundaries. Jurisdictions should pursue **regional or cross-boundary cooperation agreements** to mitigate displacement. For subnational programs, work with neighbouring provinces or states: share information on deforestation activity, coordinate land-use planning (so one province’s strict conservation isn’t undermined by the next province’s lax policies), and ideally have joint enforcement operations for border areas. Some jurisdictions set up inter-provincial REDD+ committees or sign MoUs to collaborate. Document any such cooperation efforts, as they signal proactive leakage management beyond one’s jurisdiction.
- **Leakage Monitoring and Early Warning:** Extend the **monitoring system beyond the project area**. Jurisdictions should configure their forest monitoring (satellite, ground reports) to track deforestation in potential leakage zones. If subnational, this might be done in partnership with the

national MRV unit – e.g. get deforestation alerts for the whole country, not just the crediting area. Periodically analyze data: *Did deforestation increase there?* If yes, investigate causes (maybe unrelated, but if related to displaced agents, then adjust strategy). By including this in the standard operating procedures of the MRV team, leakage can be caught in near-real-time. Some programs even involve communities outside the project area in participatory monitoring to help signal influx of new deforesters.

- **Incorporate Flexibility and Adaptive Management:** Recognize that leakage patterns may change and be prepared to **adapt interventions**. For instance, initial analysis might not foresee a certain leakage pathway, but during implementation you might notice a new trend – e.g. a protected area leads to more mining in another region. The guidance is to keep an eye on these dynamics and be ready to expand or tweak REDD+ actions. If leakage is detected in a specific area, consider **extending program incentives or support to that area** (even if it’s outside the original boundary). This adaptive approach should be documented: for example, in the Safeguard report for the next verification, explicitly mention “We observed some leakage in area X, so we have since done Y to address it.” That level of responsiveness shows conformance with the safeguard’s intent.
- **International Market Considerations:** For market-driven leakage (like commodity markets), implement measures such as **sustainable supply chain initiatives**. Encourage or mandate that commodities from your country/jurisdiction are produced deforestation-free across the board. This can involve certification schemes, moratoria (like the Soy Moratorium in Brazil which helped prevent soy farmers from moving into forests), or engagement with companies to not simply shift sourcing to non-REDD regions. If your REDD+ program reduces timber harvest in natural forests, work on boosting plantation timber or imports from sustainable sources rather than leaving a supply gap that others fill unsustainably. Essentially, align with international best practice that calls for demand-side measures (e.g. the EU’s deforestation regulation) – by doing so, you reduce leakage via markets. Implementation might include partnering with commodity roundtables or creating incentives for deforestation-free production in the whole country. Demonstrating that the jurisdiction is aware of and acting on these market dynamics can be part of the narrative that leakage risk is under control. (Auditors will not hold a country accountable for global market shifts, but showing due diligence in this area underscores commitment to the spirit of Safeguard 7.1.)

Guidance Note: Developing a High-Quality REDD+ Safeguard Information System (SIS)

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Introduction

A **Safeguard Information System (SIS)** is essentially the domestic institutional arrangement and processes for providing information on how REDD+ safeguards are addressed and respected throughout the implementation of REDD+ activities. Parties to the UNFCCC are required to develop an SIS as part of REDD+ readiness, but **official UNFCCC guidance on SIS design is broad**. At COP17 (Durban), Parties agreed that an SIS should have certain key characteristics: it should be:

- *Country driven,*
- *transparent,*
- *accessible,*
- *flexible for improvements,*
- *comprehensive (covering all Cancun safeguards), and*
- *build upon existing systems.*

Beyond these principles, countries have flexibility in how to set up their SIS.

This guidance note translates the UNFCCC's broad principles into detailed recommendations for **all jurisdictions** to develop a high-quality SIS, without focusing on any single country. The aim is to ensure the SIS is robust, meets UNFCCC requirements, and effectively informs both national and international stakeholders.

Key Principles of a High-Quality SIS (UNFCCC-Aligned)

A high-quality SIS adheres to the UNFCCC's **broad guidance** on SIS characteristics. These foundational principles should guide all design decisions:

- 1. Transparency and Consistency:** The system should provide **transparent, credible information** on safeguards, presented in a consistent manner over time. All relevant details on how safeguards are addressed must be openly available, and methodologies and reporting formats should be uniform to enable comparability across reporting periods. Transparency builds trust, so information (e.g. reports, data, criteria) should be published regularly and subject to review as appropriate.
- 2. Accessibility (Stakeholder Access):** The SIS information must be **accessible to all relevant stakeholders**. In practice, this means establishing a user-friendly platform (such as a dedicated SIS website or portal) where any stakeholder – from local communities and civil society to international partners – can easily retrieve safeguard information. Accessibility also implies using clear language (and translations if needed) and formats that are understandable to non-specialists. Regular updates are important so that stakeholders have up-to-date information on safeguards implementation.
- 3. Flexibility and Continuous Improvement:** The SIS should be **flexible to allow improvements over time**. Countries often adopt a stepwise approach: the SIS can start with basic information and progressively expand or refine its indicators and data as capacity grows. This adaptive management ensures the SIS remains relevant and “learns” from implementation, creating a positive trajectory of improvement in safeguards reporting. For example, as new REDD+ activities or policies are introduced, the SIS should be able to incorporate additional data or new indicators. Regular reviews of the SIS (e.g. after each reporting cycle) can identify gaps and lessons, which are then used to enhance the system.

4. **Comprehensive Safeguard Coverage: All Cancun safeguards** (the seven safeguards in UNFCCC Decision 1/CP.16, Appendix I) must be **addressed and respected**, and the SIS should report on each of them. A high-quality SIS is **complete** in scope – it covers environmental, social, and governance safeguards, correlating information with the nature and stage of REDD+ actions being implemented. This means no safeguard is omitted from the reporting; even if certain safeguards are less pertinent to some actions, the SIS should still note how they are considered. The information provided should demonstrate how **each safeguard is being respected in practice**, not just in theory.

5. **Country-Driven and National in Scale:** The SIS is to be **country-driven, implemented at the national level**. This principle recognizes national sovereignty and circumstances – each country’s SIS will reflect its legal framework, policies, and institutional arrangements. A high-quality SIS is tailored to the country’s context: it builds on national definitions or interpretations of the Cancun safeguards, aligns with national REDD+ strategies, and is integrated with existing national systems (e.g. forest monitoring, biodiversity databases, or socio-economic data systems). Being country-driven also implies that the design and operation of the SIS are led by the government, with domestic stakeholders’ input, rather than imposed externally.

6. **Built on Existing Systems and Information:** Wherever feasible, the SIS should **build upon existing systems and sources of information**. Rather than creating an entirely new information silo, a quality SIS links and **leverages existing national systems** – such as environmental monitoring systems, social databases, or safeguard frameworks from ongoing projects. Utilizing established data sources and institutional mandates enhances efficiency, consistency, and sustainability. For example, if a country already has a biodiversity monitoring program or an indigenous peoples’ rights database, those can feed into the SIS for relevant safeguard areas. Building on existing systems also helps embed the SIS into institutional routines and ensures it aligns with what the country is already doing in terms of safeguards compliance.

These core principles set the **quality benchmark**. In the absence of prescriptive UNFCCC rules on **how** to design the SIS, the rest of this guidance provides practical design elements to fulfil these principles in a coherent, effective manner.

Defining SIS Objectives and Scope

Begin by clearly defining the **objectives and scope** of the SIS. The system must serve **multiple needs**: domestic needs (e.g. informing citizens, guiding policymakers, improving REDD+ project implementation) and international needs (reporting to the UNFCCC, and possibly to donors or standards). High-quality SIS design starts with asking: *What questions should the SIS answer?* and *Who will use this information?* Key considerations include:

- **Domestic Objectives:** Ensure the SIS informs national audiences (government agencies, local communities, NGOs) about how safeguards are handled in REDD+ activities.

- **International Objectives:** The SIS should fulfil UNFCCC requirements by providing the basis for the **Summaries of Information (SOIs)** that must be submitted periodically to the UNFCCC. It may also support compliance with requirements of standards or results-based payment programs, if applicable.

- **Scope of REDD+ Activities:** Define the scope of REDD+ actions covered (e.g. all activities under the national REDD+ strategy). A high-quality SIS covers **all relevant REDD+ actions** – whether they are on-the-ground measures (like reforestation programs) or enabling measures (like policy reforms).

The SIS should eventually capture safeguard information across the full breadth of REDD+ interventions at national (or subnational, if applicable) scale.

By clarifying objectives and scope upfront, you set a strong foundation so that the SIS is purpose-built to meet those needs. This helps ensure the system collects the **right information** and delivers **useful reports** rather than amassing data with no clear use.

Developing a Robust Indicator Framework

Indicators and metrics are the backbone of an SIS – they define what information is collected to demonstrate that safeguards are addressed and respected. A high-quality SIS uses a well-thought-out **indicator framework** that is *aligned with the Cancun safeguards and tailored to the country’s REDD+ actions*. When designing SIS indicators, consider the following best practices:

- 1. Align with National Safeguard Interpretation:** Each country should have interpreted or clarified the broad Cancun safeguards in its own context (e.g. defining what “transparent governance” or “full participation” means nationally). Ensure your indicators are **in line with the country’s own safeguard definitions and principles**. In other words, if the country has elaborated specific criteria under each safeguard, the SIS indicators should measure whether those criteria are being met. This alignment guarantees that the SIS is measuring the concrete aspects that the country considers important for each safeguard.
- 2. Cover All Safeguards with Relevant Metrics:** The set of indicators collectively should provide evidence for **each** safeguard, ensuring completeness. Keep indicators **specific and measurable** so that the information reported is concrete and verifiable.
- 3. Differentiate by Type of REDD+ Action:** It is crucial to recognize that different types of REDD+ interventions will need different kinds of information. **Differentiate indicators for direct implementation actions vs. enabling (policy) actions**, where relevant. For instance:
 - Direct actions* (like afforestation/reforestation projects, forest protection, restoration activities) – these are on-the-ground interventions. Indicators here could be very site-specific or community-specific (e.g. number of hectares reforested with adherence to environmental standards, instances of obtaining Free Prior Informed Consent from local communities, absence of rights violations or disputes in project areas, etc.).
 - Enabling or policy actions* (like legal reforms, land tenure clarification, governance improvements) – these are higher-level measures. Indicators for these might look at policy outputs and their implementation (e.g. the extent to which a land tenure reform process respected indigenous rights and participation).

By tailoring indicators to the **nature of the action**, the SIS can capture the nuances of how safeguards are respected in each context. *One size does not fit all*: a law reform might be assessed via qualitative indicators (policy analysis, stakeholder feedback), whereas a field activity might use more quantitative or site-monitoring indicators. Designing the indicator set in this differentiated way makes the SIS reporting far more **relevant and accurate** for each REDD+ measure.

- 4. Robust and Adequate for UNFCCC Reporting:** Ensure the indicators chosen will allow the country to compile a **robust summary of information** demonstrating safeguard compliance, as required by the UNFCCC. They should be capable of capturing not just **whether** safeguards are addressed, but **how well** they are being addressed. Consider using both qualitative indicators (narrative

descriptions, case studies, process documentation) and quantitative indicators (metrics, counts, indices) in combination. This mix can provide a fuller picture. Additionally, if the country is pursuing any specific REDD+ standards or financing schemes (e.g. ART-TREES), ensure the **consistency or equivalence** with those so that one SIS can serve multiple reporting needs.

5. **Clarity and Specificity:** Each indicator should be clearly defined, with a rationale and data source. Avoid overly broad or vague indicators. For example, instead of a vague indicator like “safeguard policies in place,” specify something like “existence of a published guideline on FPIC (Free Prior Informed Consent) for REDD+”. Clear indicators will make it easier to gather consistent data and to understand the results.

In summary, a high-quality SIS indicator framework is **comprehensive, tailored, and practical**. It links back to the Cancun safeguards, adapts to various REDD+ actions, and produces information that is meaningful for assessing safeguard performance.

Institutional Arrangements and Governance

Setting up an effective SIS is not only about *what* information to collect, but also *who* collects and manages it. **Clear institutional arrangements** are a hallmark of a high-quality SIS. When designing the SIS:

- **Roles and Responsibilities:** Clearly define **who will perform each function** in the SIS operation. Key functions include: data collection (field data, reports, etc.), data compilation and analysis, quality assurance/validation, approval of information for release, and dissemination/reporting. Assign a lead entity for managing the SIS platform itself (often the REDD+ Unit or similar). Document these roles in an SIS governance plan or protocol so that all parties understand their duties.
- **Coordination Mechanism:** Establish a central coordination body or team (often a REDD+ safeguards committee or SIS task force) to oversee the SIS. This body sets standards for data quality and consistency. Regular inter-agency meetings or a coordination platform can help align efforts and troubleshoot issues.
- **Multi-Stakeholder Participation:** In line with the participatory nature of REDD+, involve **multiple stakeholders** in the SIS process. This can be achieved by establishing a multi-stakeholder advisory group or using existing REDD+ stakeholder forums to review safeguard information. Including representatives of indigenous peoples, local communities, civil society, and private sector (where relevant) can improve transparency and credibility. Such stakeholders can provide feedback on the information, help identify gaps, or even contribute data (for instance, community-based monitoring results). This participatory approach reinforces the **transparency and country-driven** nature of the SIS.
- **Quality Control and Validation:** A high-quality SIS has checks to ensure information is accurate and trustworthy. Plan for internal review of data (by the responsible agencies or an SIS safeguards committee), and consider external or independent reviews for sensitive information. Define a process for handling any conflicting information or complaints about the data (for example, if an NGO disputes a government report on safeguards, how will that be addressed?). By having a **validation process**, the SIS maintains credibility.

In essence, **good governance** of the SIS means everyone knows their role in the information supply chain, and there are mechanisms to coordinate and verify the information. This institutional backbone is critical to sustain the SIS over the long term.

SIS Platform and Data Management

To meet the principles of transparency and accessibility, a **user-friendly technological system** is needed to manage and disseminate the safeguard information. Key considerations for the SIS platform include:

- **Dedicated SIS Web Portal:** Develop a dedicated webpage or online portal for the SIS where all safeguard information is published in one place. This portal should include an overview of the SIS, the safeguards and their definitions, the indicators being tracked, and the latest information or reports for each indicator/safeguard. For example, an interactive dashboard could display current data, and a document library could provide full reports or data files. The portal is the public face of the SIS, enabling stakeholders to easily find the information.
- **Database and Storage:** Behind the front-end website, set up a secure **database** to store all collected data and documents. This could be as simple as a structured set of spreadsheets or as complex as a relational database, depending on volume and complexity of data. Ensure the database is organized by safeguard and by reporting period or REDD+ action, so that information can be retrieved and updated systematically. Data management procedures should be established – including data entry, cleaning, backups, and archiving of older information once updated.
- **Hardware/Software Requirements:** Identify the **hardware and software requirements** for running the SIS platform. This might involve a server (or cloud service) for hosting the database and website, and software for data analysis and visualization. Where possible, use **open-source or commonly used tools** to reduce costs and ensure longevity. For instance, some countries use simple Content Management Systems (CMS) for the SIS website and spreadsheets or GIS tools for data. The system should not be over-engineered; it must be something the responsible institutions can maintain with available capacity.
- **Design for Usability:** The interface should be intuitive. Use clear menus organized by safeguard or by REDD+ activity, and consider multiple languages if needed for local stakeholders. Provide explanatory notes for technical indicators so users know what they're looking at. High-quality SIS often include infographics, maps (showing project locations or forest changes), and charts to communicate data effectively. **Downloadable reports and data files** should be available for transparency, allowing analysts or researchers to examine the information in detail if they wish.
- **Regular Updates and Maintenance:** Establish a schedule for updating information on the portal (e.g. annually or biennially, depending on how often new safeguard data is collected). Each update cycle should have an assigned coordinator to gather inputs from all agencies and upload the new information. Also plan for site maintenance – ensuring links work, the site is secure, and it adapts to any new web standards. An outdated or non-functional website can undermine the transparency goal, so it's important to allocate IT support.

By paying attention to the **technological infrastructure**, a high-quality SIS ensures that all the valuable safeguard data collected is effectively **managed and shared**. The platform turns the SIS from an internal process into a **publicly accessible system**, fulfilling the transparency and accessibility commitments.

Integration with Grievance Redress Mechanisms and Other Systems

Safeguard information often overlaps with other aspects of REDD+ implementation. Two important linkages to consider are **grievance redress mechanisms (GRM)** and other monitoring systems:

- **Grievance Redress Mechanism Integration:** Many countries establish a REDD+ **Feedback and Grievance Redress Mechanism** parallel to safeguards, to handle complaints or feedback from stakeholders (e.g. a community might report a safeguard violation). A high-quality SIS should be linked with the GRM. In practice, this could mean that the SIS portal provides a channel for stakeholders to submit grievances or feedback online, which then feeds into the GRM process. Conversely, **information from the GRM** (such as number of complaints received, types of issues raised, and their resolution status) should be captured in the SIS reporting as part of demonstrating how safeguards are addressed. For example, if several grievances are filed about compensation in a reforestation project, the SIS report on the relevant safeguard should mention that and how they were resolved. Integrating these systems ensures that the SIS is not just a static report, but is responsive to stakeholder concerns in real time.
- **Linking to National Forest Monitoring Systems (NFMS) or Other Databases:** The SIS can also draw on data from the **National Forest Monitoring System** for certain safeguards (like natural forest conservation). For instance, if the NFMS provides data on deforestation rates or forest cover change, the SIS can use those as indicators under the biodiversity or emission displacement safeguards. Similarly, if there are existing systems for tracking social outcomes (e.g. a socio-economic benefits monitoring system), those can inform the SIS. **Building upon existing systems** is one of the UNFCCC principles cifor-icraf.org, and integration helps avoid double work and ensures consistency of information across platforms. Make sure to establish data-sharing agreements or protocols with owners of other systems so that the SIS can regularly obtain needed data.
- **Harmonizing Reporting Frameworks:** If the country is using multiple safeguard-related frameworks (for example, World Bank safeguards for a Forest Carbon Partnership Facility program, or voluntary standards like CCBS), consider mapping and harmonizing these requirements with the SIS. A high-quality SIS can serve as a **central hub** where information is compiled to meet various reporting needs, as long as those needs are identified in the design phase. This avoids having separate parallel reporting streams and makes the SIS more efficient.

In summary, the SIS should not exist in isolation. By **connecting it with grievance mechanisms and other information systems**, you enhance the SIS's completeness and usefulness. This integrated approach contributes to a more **coherent REDD+ safeguards regime**, where feedback loops and data flows across systems help ensure, safeguards are truly implemented on the ground.

Ensuring Sustainability: Capacity, Resources, and Improvement

For an SIS to be high-quality, it must not only be well-designed initially but also **sustainable over time**. Key factors include human capacity, financial resources, and processes for ongoing improvement:

- **Capacity Building:** Assess the current capacity of the institutions and staff who will run the SIS. Are they familiar with data management, analysis, and reporting? Do they understand safeguards in depth? Identify any gaps and undertake **capacity strengthening** efforts. This could involve training staff on the use of the SIS database, hiring or assigning a safeguards information officer, or workshops on how to analyze and interpret safeguard data. Building a knowledge base within the country ensures the SIS can be maintained and improved internally, which is essential for country-driven implementation.
- **Resources and Financing:** A high-quality SIS requires **adequate resources** for setup and operation. Develop a clear budget covering the initial design costs (consultations, software, web development, etc.) and the operational costs (staff time for data collection and management, website hosting fees, ongoing trainings). Where possible, secure long-term financing for the SIS, perhaps by integrating it into government budgets (e.g. environment or forestry sector budgets) or using REDD+ readiness/implementation grants. Lack of funding can jeopardize regular updates, so plan for financial sustainability. Even if initial donor funds support the SIS, a strategy for transitioning to domestic funding over time can be wise.
- **Piloting and Phased Implementation:** Consider piloting the SIS on a smaller scale initially – for example, testing data collection for one or two safeguards or in one region – before scaling up to full national implementation. This **stepwise approach** allows for learning and course-correction, exemplifying the flexibility principle. After a pilot, incorporate lessons learned to improve the system before rolling it out nationwide. A phased approach also spreads resource needs over time and can produce early results to maintain stakeholder buy-in.
- **Periodic Review and Updates:** Treat the SIS as a **living system**. Set a schedule for periodically reviewing the entire SIS (perhaps every year or after major reporting submissions). This review should evaluate what is working well and what is not – for example, are some indicators too hard to measure? Are stakeholders satisfied with the information provided? Use these evaluations to **update the SIS design** – you might refine indicators, add new data sources, or streamline processes. Document any changes clearly to maintain transparency about the evolution of the system. The goal is continuous improvement, showing a “positive direction of travel” in how safeguards are monitored and reported.
- **Maintaining Political and Stakeholder Support:** Finally, ensure that key decision-makers remain committed to the SIS. High-level support (from a REDD+ steering committee or a ministry) can help secure funding and inter-agency cooperation. Similarly, keep stakeholders engaged by demonstrating the value of the SIS – for instance, show how SIS findings have informed better project design or addressed community concerns. When people see that the SIS leads to **tangible improvements in safeguard implementation**, they will continue to support and contribute to it, which in turn helps maintain the system’s quality.

By planning for the long term – through capacity building, securing resources, and embedding a culture of improvement – you will keep the SIS high-quality and credible years into the future, not just at the moment of its launch.

Reporting and Verification of Safeguard Information

One of the end goals of an SIS is to **report** how safeguards are being addressed and respected. High-quality SIS design considers reporting requirements and verification needs from the start:

- **Summary of Information (SOI) Preparation:** Countries are expected to periodically submit a **Summary of Information** to the UNFCCC, detailing how all Cancun safeguards have been addressed and respected. A strong SIS simplifies this task by serving as the primary source for the SOI. Plan the **content and structure** of the SOI in advance, aligning it with the SIS structure. For example, organize the SIS information by safeguard, since the SOI will likely describe each safeguard in turn. Ensure that for each safeguard, the SIS can generate a concise narrative backed by data – this may include describing policies in place, actions taken to respect the safeguard, any issues encountered, and how they were resolved. Many countries include tables of indicators or case examples in their SOIs; designing the SIS to produce those elements (or even automating parts of the SOI from the SIS database) can greatly enhance efficiency and consistency.
- **National Communications and Other Reports:** Beyond the dedicated SOI, safeguard information may also be reported in National Communications or other climate change reports. A quality SIS can feed into these by providing up-to-date data and stories. Design your SIS outputs (even if primarily for UNFCCC reporting) such that they can be easily repurposed for **domestic reports, donor reports, or public information releases**. This might involve maintaining both detailed data (for technical audiences) and summary briefs (for general audiences).
- **Verification and Review:** While the UNFCCC does not currently mandate a formal international verification of safeguard reports, transparency is enhanced if the SIS information undergoes some form of review. Consider inviting **review the draft SOI reports** before finalizing them. Their feedback can be incorporated to improve accuracy and credibility.
- **Public Feedback on Reports:** Once an SOI or any safeguard report is published (e.g. on the SIS portal), provide a channel for **public feedback or questions**. High-quality SIS treat reporting as a two-way communication. For example, after releasing the safeguards summary, host a webinar or workshop with stakeholders to discuss the findings. This can uncover any discrepancies or concerns, which can then be addressed in future SIS iterations. It also reinforces stakeholder trust by showing that their perspectives on the reported information are valued.

Ultimately, the **credibility of the SIS is judged by the quality of its outputs** – the reports and data that demonstrate safeguard compliance. By building the SIS with reporting in mind, and incorporating review mechanisms, you ensure that the SIS not only gathers information but also effectively **tells the story of how safeguards are being respected** in REDD+ implementation. This positions the country to confidently meet UNFCCC requirements and to showcase its commitment to social and environmental integrity in REDD+ actions.

Conclusion

Developing a high-quality SIS is a **comprehensive endeavour** that goes beyond a checkbox exercise. It requires weaving together the UNFCCC's guiding principles with practical design elements – from defining objectives and indicators to setting up databases and validating information. The result of such an effort is a system that is **transparent, accessible to all, adaptable, complete in scope, and firmly grounded in the country's own systems and capacities.**

In essence, a strong SIS becomes the backbone for demonstrating that REDD+ implementation is not only reducing emissions, but doing so in a manner that safeguards communities, respects rights, and conserves biodiversity.