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Subject: Comments on TREES 3.0 draft
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This submission has been prepared under the auspices of Canopy PACT, which is a charitable spin out from the Cambridge Centre for Carbon Credits (4C) - an interdisciplinary research group from the University of Cambridge's Departments of Zoology, Plant Sciences, and Computer Science.

Canopy PACT was registered with the Charity Commission in January 2025 and aims to create an independent scientific council and operational criteria for raising the integrity of nature-based carbon projects, based on 4C's and other peer-reviewed research.

Within 4C we have spent close to five years developing an understanding of the theoretical basis of what carbon credits are and the ways they are manufactured.

Our specific expertise is centred on:

- What constitutes a robust evaluation method?
- How do evaluation methods shape credit integrity?
- How does credit integrity define the impact claims that can be made?

This document was prepared by Dr Eleanor Toye Scott and Dr Tom Swinfield, with input from Prof Julia Jones.

Section number / title and requirement of the standard referenced: 1.1 Description of ART and TREES

Comment, suggestion or other feedback

We welcome the ART TREES 3.0 draft and its ambition to promote the environmental and social integrity of greenhouse gas emissions reductions and removals from the forest and land use sector. We have five comments about the draft, which we will elaborate below. In brief, these are:

- We strongly support the need for nature-based avoidance credits and recognise the importance of jurisdictional approaches in creating incentives for policies to be adopted that reduce deforestation.
- We support the ART TREES 3.0 draft framework recognition that credits should not be issued for emission reductions and removals (ERRS) that have not yet occurred.
- The ART TREES 3.0 draft proposes calculating carbon additionality in relation to static baselines based on historical deforestation rates. This approach risks incentivising adoption by jurisdictions where deforestation rates are decreasing even in the absence of carbon finance, while disincentivising adoption by jurisdictions with increasing deforestation rates. Dynamic baselines, that compare contemporaneous deforestation rates in similar jurisdictions without carbon finance,

should be seriously considered.

- Projects that reduce atmospheric greenhouse gas concentration by storing carbon in nature are likely to cause significant emissions through the displacement of extensive land uses elsewhere (i.e. international leakage), but these indirect emissions are ignored by the ART TREES 3.0 draft framework.
- Buffer pools have significant weaknesses as a mechanism to account for the durability of carbon storage. This is particularly pertinent when undercapitalised compared to the magnitude of the reversal risk. We recommend recognising that nature-based credits carry significant reversal risks that could be addressed through more sophisticated buffer pools or alternative approaches. One option would be to discount the value of impermanent credits according to conservative assessments of reversal risk (e.g. Balmford et al. 2023). An alternative would be explore the option of insuring credits so that they can be replaced in the event of reversals.

Section number / title and requirement of the standard referenced: 3.1.2 National Reporting Requirements

Comment, suggestion or other feedback:

We recognise that the ART TREES 3.0 framework is based on carbon accounting with respect to the contributions of national government participants, and that this relates to Nationally Determined Contributions as defined in the 2015 Paris Agreement. However, it is a major weakness of the framework that it fails to account for or address “leakage” of emissions across national borders.

Any project that reduces atmospheric carbon directly is likely to cause emissions elsewhere indirectly. This has material effects on the impact that can be claimed. For nature-based projects additional carbon storage almost always results in forgone production, which causes emissions elsewhere. For this reason, 100% of forgone production should be considered to cause leakage, unless projects can demonstrate mitigation through verifiable interventions. For example, projects claiming reduced land-use change in agricultural systems could show evidence of compensatory yield improvements.

In practice, in the case of reduced deforestation, mandating leakage mitigation would encourage carbon projects to be implemented on less productive land that has a high potential for storing carbon. At the same time, estimating and compensating for forgone production would leave a lot less to chance outside of the jurisdictions implementing ART TREES 3.0. Activities implemented to enhance yields on land already under production would ensure that market leakage does not happen because the supply of key products is maintained at the same time as increasing carbon storage.

Section number / title and requirement of the standard referenced: 3.5 ADDITIONALITY

Comment, suggestion or other feedback:

Additionality quantification: we advocate for a shift from ex ante baselines to ex post verification using quasi-experimental approaches as the primary basis for assessing additionality and credit issuance. While ex ante methods may serve preliminary financing needs, high integrity credit volume should rely on quasi-experimental approaches that

compare project or jurisdictional outcomes with real control groups exposed to the same external conditions. For REDD+ and similar programs, this means moving beyond historical baselines to dynamic monitoring of deforestation rates in project areas versus comparable non-project areas. The ART TREES 3.0 standard should explicitly require quasi-experimental approaches, or at the very least recognise their widespread use by independent assessors (academia, ratings agencies etc.) and work towards ensuring that credit issuance is in line. We recognise that this request is a significant technical challenge. However, failing to engage with this issue and leaving these kinds of analysis to independent assessors introduces serious risks of over-crediting that would further impede the adoption of carbon credits from forest conservation.

Similarly, static baselines are likely to exclude jurisdictions where deforestation rates are increasing, including high forest cover low deforestation (HFLD) settings, from carbon finance. This is historic averages underestimate the true deforestation pressure, which make carbon finance uneconomical. In contrast, dynamic baselines are capable of tracking increases in deforestation pressure which creates opportunities to engage these jurisdictions.