



Public comments on ART TREES 3.0

October 1st, 2025

Dear Secretariat of the Architecture for REDD+ Transactions:

Environmental Defense Fund (EDF) appreciates the opportunity to provide comments on TREES 3.0 during the global public consultation period. EDF has long supported the development of high-integrity jurisdictional approaches to reducing emissions from deforestation and forest degradation (REDD+), and we commend ART's leadership in advancing a rigorous and transparent framework. Our comments reflect EDF's technical expertise and commitment to ensuring that TREES 3.0 both upholds environmental and social integrity and facilitates broad jurisdictional participation in high-quality carbon markets.

We applaud ART for undertaking this robust consultation process and would welcome the opportunity to discuss comments and suggestions submitted herein at your convenience, and otherwise support the standards review process.

Sections:

2. ART Cycle

2.5 Timeline and deadlines.

Suggestion: Allow monitoring reports to cover any consistent 12-month period, rather than requiring alignment with the January–December calendar year.

Rationale: National monitoring systems may use different annual reporting cycles recognized by the scientific community. For example, Brazil's PRODES system — widely regarded as a first-in-class deforestation monitoring program — operates on an August–July cycle. Restricting ART/TREES to a January–December period could unnecessarily disqualify jurisdictions with robust, credible monitoring systems, such as Brazil and Brazilian States.

3. Eligibility, Applicability, and Key Requirements

3.1 Eligible entities

Comment: The 2040 national deadline for countries to use TREES only with a full national scope must be considered carefully. This provision could exclude the use of other jurisdictional standards (except perhaps project-level with nesting) and may cut out

mechanisms such as the GCF. It also has implications for IPLC submissions, which are territorial rather than national in nature. We recommend further discussion on this point and consultation with stakeholders.

3.1.3 Transition Pathway for Forest Carbon Partnership Facility (FCPF) Carbon Fund and Readiness Fund Participants

Suggestion: consider creating an exploratory group to assess and, if warranted, establish a transition pathway for the World Bank's sister ISFL program, drawing upon learnings and lessons developing the FCPF Transition Pathway. At least 1 ISFL jurisdiction is rapidly approaching issuance and looking towards a transition to ART-TREES.

Rationale: expand the potential pool of supply of ART-TREES credits and reduce friction for ISFL program participants who may desire to transition to ART-TREES.

5. Crediting Level

5.3 Calculating a TREES Crediting Level for Removals

Comment: The removals accounting for commercial plantations under TREES does not follow a zero baseline for every new plantation; instead, it requires that every new plantation be measured against the year-one baseline. Some private investors have described this approach as demotivating. We recommend careful review of this provision.

7. Reversals and Leakage

7.1 Reversals

Suggestion: Recognize that jurisdictions achieving sustained emissions reductions below historical levels, even while increasing economic production in deforestation-driven sectors (e.g., cattle, soy), should not be considered as having reversals.

Rationale: As Brazil and Amazon states did between 2004–2012, such jurisdictions have created permanent emissions reductions regardless of whether emissions increase subsequently.

7.1.3 Reversal Compensation

Comment: If not yet conducted, please consider a jurisdictional financial viability stress test to consider the aggregate impact of various deductions (leakage, etc.) and increased buffer contributions post-reversal events, with an eye towards ensuring that such deductions, in aggregate, do not render the program nonviable at current market prices.

7.2 Leakage

Comment: Similarly, where jurisdictions increase the production of historical drivers of deforestation while reducing deforestation and emissions, no leakage can be said to occur. Even if production of e.g. cattle or soy increases in neighboring jurisdictions, this only means that demand for these commodities has increased, not that leakage has occurred. Please further consider Brazil's experience boosting production while reducing deforestation and assess means to avoid unnecessarily punitive leakage deductions.

12 . Environmental, Social, and Governance Safeguards

Comment: While the explicit inclusion of women and youth in the safeguards section is a welcome step, we consider that there is a need for TREES 3.0 to include clear gender indicators and requirements for transparent benefit-sharing arrangements that fully respect the rights of IPLCs.

13. Avoiding Double Counting

13.1 Double Issuance

Comment: The stipulation that validated project credit be deducted from a jurisdiction's potential credits from emissions reductions penalizes jurisdictions arbitrarily. About half of the VERRA certified REDD+ projects in the Amazon include credit for private landholders claimed on public lands (protected areas) and thus do not represent real emissions reductions. Deducting these from jurisdictional credit volumes punishes jurisdictions for the offenses of landowners and project developers. It also penalizes Indigenous and traditional communities since benefits available to them from jurisdictional programs are reduced. Voluntary market projects should be incorporated into jurisdictional systems, such that the total volume of credit generated by a jurisdiction and any projects within it does not exceed the total real emissions reductions in the jurisdiction, with one possible exception.

The ecological value, including climate change mitigation, of extensive, continuous protected forests such as those occupied by Indigenous and traditional peoples in the Amazon far exceeds any existing or likely carbon price or any existing payment for ecosystem services program. The protection of these territories is indispensable to averting catastrophic climate change. Jurisdictions should thus be able to claim credit for reducing emissions from deforestation, while Indigenous and traditional peoples territories should also be able to claim HFLD credit. In addition, Indigenous and traditional peoples should be able, if they wish, to develop voluntary market projects on their territories and also participate in jurisdictional programs.

14. Validation and Verification

14.2 Validation and Verification Body Accreditation

Suggestion: Review and require VVBs to include in-country experts and interpreters as members of each audit team.

Rationale: Improves customer experience, audit quality, and reduces the reputational risk of ART being perceived as distant from the operational realities of Participants. The VVB experience is in practice perceived to be inextricably linked to the overall ART-TREES experience, which creates potential reputational risk that could be partially mitigated through stronger requirements for inclusive VVB audit procedures.

Detailed suggestion: Suggest incorporating the below bold, italicized language into the TREES 3.0 Standard and, as appropriate, in the TREES Validation and Verification Standard:

Validation and Verification Bodies shall also complete an application and an Attestation of Validation and Verification Body to be an approved ART Validation and Verification Body. This process serves to ensure the Validation and Verification Body has the technical capabilities, qualifications, and resources to successfully complete a TREES validation and verification. Additional detail regarding the process and required capabilities, qualifications, and resources are provided in the TREES Validation and Verification Standard. ***Additionally, prior to authorizing each audit job, ART will review for, and require, the VVB to demonstrate the inclusion of at least a) 1 audit team member who resides within the host jurisdiction being audited; and b) 1 audit team member who serves as interpreter, to interpret into nationally recognized language(s) during the audit process.***

14.3 Validation and Verification Process

Suggestion: ART to take accountability for complaints stakeholders levy against VVBs.

Rationale: Improves customer experience and strengthens ART's ability to protect against reputational risk derived from poor VVB performance. In practice, VVBs are an essential part of the ART system and customer experience, and therefore, issues with VVBs are de facto inseparable from ART.

Detailed Suggestion: Add a sentence at the end of the existing paragraph stating: *“ART will treat complaints and appeals against VVBs as complaints and appeals against any other stakeholder and will investigate directly. ART may additionally raise complaints and appeals received against VVBs to the VVBs' accrediting body directly.”*

Include this clarification in **Clause 3.12 of the TREES Validation and Verification Standard (Complaints and Appeals)**.

16. Complaints and Appeals

16.1 Scope

Suggestion: ART to take accountability for complaints stakeholders levy against VVBs (similar to above, including as applies to both sections).

Rationale: Improves customer experience and strengthens ART's ability to protect against reputational risk derived from poor VVB performance. In practice, VVBs are an essential part of the ART system and customer experience, and therefore, issues with VVBs are de facto inseparable from ART.

Detailed suggestion: Amend paragraph to indicate that The TREES Complaints and Appeals procedure includes complaints regarding the conduct or decisions of the Validation and Verification Body. Add supplementary language in the subsequent Clause 16.2 and 16.3 as warranted. Should this be determined to not be appropriate, suggest explaining in further detail why not, as well as what the procedure is for addressing and correcting VVB performance under the ART Oversight process, and making this information more readily available.

EDF reiterates its support for ART's leadership and looks forward to ongoing engagement to strengthen TREES 3.0