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**Subject:** Comments on TREES 3.0 draft  
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Dear ART Secretariat,

Many thanks for the opportunity to comment on version 3.0 of TREES. We appreciate the very significant amount of work involved in this.

We have prepared the following comments, as follows:

**Sections 3.1.1 and 3.1.3** of the ART frameworks establish minimum forest area thresholds of 2.5 million hectares and 1 million hectares for sub-national accounting. These thresholds may disadvantage smaller jurisdictions, effectively excluding them from piloting ART at the sub-national level. Such criteria could restrict early participation and innovation in regions with significant forest conservation potential but smaller forest extents. Sub-national criteria could be limited to the administrative level?

**Section 4.1.2:** Please clarify how biomass maps can be utilised to generate Emission Factors (EFs), similar to the explanation provided for Models & Equations and IPCC Default Values. A more detailed description of the methodology or acceptable approaches for integrating biomass maps into EF estimation would improve transparency and consistency in application.

Updating Emission Factors (EFs) every five years may be resource- and time-consuming, particularly for jurisdictions with limited technical capacity. Extending the update interval to ten years would be more practical and sustainable, while still maintaining methodological robustness.

**Section 4.2.2 – Removal Factors:** Please clarify whether the calculation of removal factors considers the sequestration capacity of the tree species being planted. Including species-specific growth rates and carbon sequestration potential would enhance the accuracy and credibility of removal estimates.

**Section 13.2 – Please clarify double use – 3) paid for as a CO<sub>2</sub>e results-based payment and then also transferred or sold to another entity.**

*Definitions – Please add definitions on Activity-based approach and Land-based approach.”*

We would also like to highlight the following modules, and specific indicators, from the draft Beyond Carbon Benefits certification standard, which we believe are important to ensure are integrated within TREES.

## 2.2 BIODIVERSITY MODULE

Desired Outcome 1: Identify key biodiversity areas (KBA) and other areas of global and regional biodiversity significance

Indicator 1-1: KBAs and other areas significant for global and/or regional biodiversity conservation within the TREES accounting area are defined and identified.

**Comments:** *this should be integrated into v3.0 as mandatory and include the KBA National Coordination Group (with IP & LCS)*

## 2.3 SOCIAL – CULTURAL MODULE

Theme 1. Sustainable Indigenous and Community Economy

Desired Outcome: The REDD+ program generates progress in the well-being and economy of Indigenous Peoples and Local Communities, strengthening cultural identity and respecting the full, sustainable, and autonomous life built from the territories themselves, as well as the objectives of conservation, sustainable use, and management of forests.

**Comments:** Mandatory indicators 1-1, 1-2 and 1-3 should all be integrated into V3.0 as mandatory and central to the financial management of funds flowing from ART TREES, potentially with a transition phase with a more streamlined set of parameters to report against during this period.

We appreciate some of these additions may be onerous and create cost for governments. However, we feel they are the minimum necessary for ensuring transparency & agency for IP & LCs; to recognise the biodiversity as well as carbon benefits of effective forest governance within the TREES accounting area; and to ensure national efforts maximise opportunities to drive Paris Agreement <> Global Biodiversity Framework synergies and efficiencies.

Many thanks for your consideration, and we wish you every success with the process going forward.

Kind regards,  
Zoe

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