

Government of Guyana

Comments on TREES 3.0 Draft Standard

Thank you for the opportunity to provide feedback on the Draft TREES 3.0 Standard. Please see feedback below, from the Government of Guyana.

1. Multiplier for Forest Carbon Stock

Current Provision: TREES 3.0 applies a **0.05% multiplier** of Forest Carbon Stock in the High Forest, Low Deforestation (HFLD) crediting approach as a conservative proxy for risk of deforestation

Comment:

- Guyana recommends that this multiplier be **increased to 0.1%**, with consideration for review in subsequent versions.
- A 0.05% multiplier is conservative and does not sufficiently reflect the true risk of forest carbon loss in HFLD countries, which must still actively manage drivers of deforestation and degradation.
- Increasing to 0.1% would more appropriately value the efforts of HFLD countries in maintaining their forests while recognizing that continued protection incurs opportunity costs and requires long-term incentives.
- This adjustment would also enhance environmental integrity by better aligning credited volumes with actual mitigation potential, while remaining conservative.

Recommendation: The multiplier should be revised upward to **0.1%** as **priority improvement in the next revision cycle**.

2. Scope of Forest Carbon Stock Pools

Current Provision: TREES 3.0 includes aboveground and belowground biomass but **excludes soil carbon, deadwood, and litter** from the forest carbon stock baseline/crediting level calculation. Though this is included in reporting on emissions, for example, from gold mining.

Comment:

- Guyana strongly recommends that **all IPCC-recognized carbon pools** (aboveground biomass, belowground biomass, deadwood, litter, and soil organic carbon) be included, subject to conservative uncertainty adjustments.
- Excluding pools such as soil and deadwood underestimates the mitigation potential of intact tropical forests, particularly in ecosystems like Guyana's where these pools contribute significantly to total carbon stocks.

- While methodological challenges exist, the IPCC guidelines and emerging scientific methods provide sufficient basis to conservatively account for these pools.
- Including them would create more accurate accounting, incentivize comprehensive monitoring, and align ART with best practices in national GHG inventories and UNFCCC reporting.

Recommendation: Revise TREES to **include all carbon pools** consistently, in both baseline and emissions reporting. Currently, only the latter is allowed.

3. Historical Average for Crediting Level

Current Provision: TREES 3.0 sets the **historical reference period at five years** for establishing the crediting level

Comment:

- Guyana recommends that the **historical reference period be extended to 15 years**, reflecting a broader and more representative assessment of national circumstances.
- A short five-year window risks biasing crediting levels due to temporary fluctuations in drivers (e.g., commodity cycles, weather events, fires), undermining both fairness and environmental integrity.
- A 15-year average better captures the structural trends in deforestation and degradation, smooths anomalies, and aligns with IPCC guidance and approaches taken by the UNFCCC.
- This is particularly important for HFLD countries like Guyana, where low deforestation rates mean that inter-annual variability can significantly distort short-term baselines.

Recommendation: Extend the historical reference period to **15 years** as the default, with allowance for countries to justify alternative periods if supported by national circumstances and data availability.

Support Changes in the following areas:

A. Subnational Accounting Extended to 2040

- **Comment:** Strongly support this extension. Many forest countries, including Guyana, need subnational pathways as transitional steps to full national accounting. Recognizing Indigenous territories and IPLC-managed lands is also vital for equity and credibility.

B. FCPF Transition Pathway

- **Comment:** Support inclusion of a time-bound pathway for FCPF participants. This ensures continuity for countries that invested heavily in readiness and aligns ART with UNFCCC processes.

C. Clarifications on REDD+ Implementation Plans

- **Comment:** Welcome the clearer requirements on describing drivers of deforestation and planned actions. This supports transparency and aligns with national REDD+ strategies.

D. Rights and Benefit-Sharing

- **Comment:** Support the explicit requirement to describe benefit-sharing arrangements. This improves alignment with safeguards and ensures IPLC participation. Guyana underscores that benefit-sharing design must remain country-driven, respecting national laws and contexts.

E. Carbon Accounting Improvements

- **Comment:** Support clarifications that biomass maps can be used to derive factors, and that emission/removal factors need not be updated every five years unless materially changed. This reduces unnecessary burden while maintaining environmental integrity.
- Support clarification on use of Tier 1 peatland methods where emissions are low. This is practical and consistent with UNFCCC flexibility for developing countries.

F. HFLD Crediting Approach

- **Comment:** Support changes allowing HFLD jurisdictions to claim removals if emissions remain within 15% of their crediting level. This ensures continued incentives for countries with consistently low emissions, while maintaining integrity.
- Support removal of avoided foregone removals option, as this simplifies the system and avoids complexity that few jurisdictions could implement.

G. Safeguards (Section 12)

- **Comment:** Strongly support strengthening safeguards by explicitly including **gender, youth, vulnerable groups, Afro-descendant peoples, transhumant communities, and uncontacted peoples**. This broadens inclusivity and ensures that ART reflects evolving best practices on equity and rights.

H. Uncertainty Treatment

- **Comment:** Support separate assessment of uncertainty for emissions reductions and removals. This improves methodological rigor and avoids distortions in credit issuance. Also support the provision to recalculate uncertainty following the end of a crediting period.

I. Double Counting & Corresponding Adjustments

- **Comment:** Support clarification that verified ERRs from other initiatives must be deducted. This ensures environmental integrity.
- Welcome strengthened requirements for corresponding adjustments, aligning TREES with latest UNFCCC guidance under Article 6.

J. Complaints and Appeals

- **Comment:** Support revisions to the complaints and appeals process. Strengthening this mechanism will build confidence among market actors and stakeholders.

Concluding Note

Guyana appreciates the substantial progress reflected in TREES 3.0. We believe that with adjustments to the multiplier, carbon pool scope, and historical reference period, the standard will more fairly and robustly incentivize high forest cover, low deforestation countries. At the same time, Guyana supports many of the technical clarifications and safeguard enhancements, which improve transparency, inclusivity, and environmental integrity.