

## **Comments to TREES 3.0 - Norway's International Climate and Forest Initiative**

### **1. Summary and overarching feedback**

Norway appreciates ART's continued efforts to improve the clarity and structure of TREES 3.0. The revised standard includes several enhancements in structure, language and reporting requirements that may contribute to making the standard more straightforward to implement and verify. However, it also broadens the scope and increases information requirements. It remains important to strike a balance between robust requirements and practical applicability. We therefore encourage ART to maintain close dialogue with countries, rightsholders, and other stakeholders and to explore opportunities for simplification and clearer guidance where this can be done without compromising integrity.

Of the most significant changes proposed in the revision, are the suggestions to extend the subnational accounting window from the 31<sup>st</sup> of December 2030 to the 31<sup>st</sup> of December 2040, and to introduce a transition pathway for countries with existing programs in the World Bank Forest Carbon Partnership Facility (FCPF) (Section 3). While we welcome the introduction of a dedicated pathway for FCPF countries to support the transition and continuity of their programs under ART/TREES, we are concerned about the shift to 2040, which marks a significant departure from the original 2030 timeframe. We strongly recommend retaining the 2030 timeframe for national-level accounting as the default, with clearly defined exemptions for IPLC territories and countries transitioning through the dedicated FCPF-pathway. We also suggest that this issue be revisited during the next TREES review ("TREES 4.0").

It is key that TREES 3.0 continues to serve as the principal benchmark for ensuring environmental integrity in REDD+ programmes and robust implementation of social and environmental safeguards. It provides the foundational structure for high-integrity crediting, underpinning results-based payments and international recognition. In this context, we would also like to refer to our written feedback to the consultation for the TREES Beyond Carbon Certification Standard (BCB) earlier this year. While the development of the BCB introduces valuable opportunities to highlight additional

benefits, it is important to ensure that this does not lead to a perception of reduced stringency in TREES 3.0. On the contrary, both standards should reinforce each other in supporting broader social and environmental objectives. We believe it is important to communicate clearly that the revision of TREES is intended to strengthen, not diminish, the integrity of the standard.

## **2. Detailed Comments**

- **Extension of the interim period for subnational accounting until 2040 (Section 3)**

National-level accounting is a key principle within jurisdictional REDD+, chiefly to ensure that programs align with countries' Nationally Determined Contributions (NDCs) and REDD+ strategies, stimulating sustainable land use policies in general, while minimizing the risk of leakage and promoting environmental integrity and transparency across jurisdictions.

In the draft TREES 3.0, ART has proposed extending the deadline for all programs to transition to national-level accounting from 2030 to 2040. This represents a substantial delay and could be seen as inconsistent with the UNFCCC Decision 1/CP.16, which states that subnational REDD+ should be implemented on an interim basis. It is difficult to reconcile a ten-year extension from 2030 to 2040 with this decision, which was adopted in 2010. Moreover, the proposal could be viewed as a weakening of ART's immutable Principle #2, which requires consistency with COP decisions, Principle #4, which promotes national ambition, and Principle #5, which stipulates that subnational efforts must be time-bound and interim.

The proposed revision should also be viewed in connection with the time-bound transition pathway for countries that have participated in the FCPF (see below), as ART introduces specific requirements for these countries, in addition to allowing subnational accounting for all countries until 2040.

We encourage ART to maintain the ambition of national-level accounting by keeping the overarching 2030 deadline as the default, while allowing limited and well-justified

exceptions for FCPF transition programs (excluding Readiness countries) and IPLC territories. We recommend that this issue be reassessed during the next periodic TREES review (“TREES 4.0”) to ensure continued alignment with ART’s principles and evolving country circumstances.

- **Transition from FCPF to TREES (Section 3)**

TREES 3.0 introduces a dedicated transition pathway for FCPF countries, allowing current Carbon Fund Participants to use their existing FCPF accounting areas for one additional crediting period, provided a TREES Concept is accepted by ART by December 31, 2028. After this period, countries must either meet the Readiness Fund criteria for a second crediting period or transition fully to TREES eligibility requirements. FCPF Readiness countries may join ART with special criteria for up to two crediting periods, using subnational accounting areas as small as 1 million hectares.

The collaboration between ART and the World Bank is a welcome step towards enabling countries to build on their FCPF experience. This approach supports the continuity and long-term development of jurisdictional REDD+ programs, while enhancing predictability and access to future carbon finance. However, it is unclear what the rationale is for allowing Carbon Fund countries to shift to the less stringent Readiness Fund criteria. This option appears to lower the bar for countries that have already advanced further, and it is not evident how such flexibility contributes to maintaining or strengthening ART’s ambition, nor how it is in line with ART’s immutable principles as referred to above. We would also view the option of allowing Readiness countries to enter ART with the suggested requirements to be a weakening of the integrity of the standard.

- **Assessment of elements related to Social Integrity (Section 2,3,12,16)**

Overall, ART has proposed several constructive elements that may contribute to strengthen safeguards, accessibility, and participation. This includes Section 2 (*use of any official language of the Participant; lengthen the comment period on Participant documents to 60 days, and explicitly require Participants to notify*

*stakeholders), Section 3 (explicit requirement for Participants to describe principles for benefit sharing), Section 12: (inclusion of women, youth, and vulnerable groups in key themes, explicit inclusion of Afro-descendant Peoples, transhumant communities, and uncontacted peoples), and Section 16 (requirement that eligibility reviewers and investigators be independent from ART and Winrock).*

Taken together, these are constructive and welcome additions to the standard, and we commend ART's proposed streamlining of reporting requirements to ease the burden on jurisdictions and improve accessibility for stakeholders.

Regarding the extension of the public comment period introduced in **Section 2**, experience shows that time invested in notification and consultations with rightsholders is well invested, including for related processes such as benefits sharing. As such, we would recommend the ART to consider extending the public comment period even further, up to 90-days.

Finally, we particularly welcome the introduction of an independent complaint and appeals process in **Section 16**. It would also be helpful to understand whether ART has considered other approaches, such as a tender process, to identify and elect independent reviewers.

- **Assessment of elements related to Environmental Integrity (Section 4, 5,12)**

In **Section 4**, we are positive to the suggested change related to Tier requirements for soil organic carbon, moving from a Tier 2/3 requirement to a Tier 1 requirement. It is, however, unclear whether the soil organic matter referred to in the standard is limited to just include peat, or if other types of organic matter (e.g muck) are also included. Clarifying whether the soil pool of mangroves is included in the simplification could also be helpful. It would improve clarity if the terminology was further aligned with IPCC. While we see merit in making this exception only for peat soils, this would create a need to single out the emissions from such soils in the greenhouse gas inventory. We would therefore encourage ART to consider clarifying that the changed requirement applies to all organic soils.

Regarding **Section 5**, there has been a suggested change to the rules for removals for High Forest Low Deforestation (HFLD) jurisdictions, allowing them to claim removals when emissions are within 15% of the crediting level. We believe these are reasonable adjustments, but it is challenging to determine the consequences for different TREES participants, and we would therefore appreciate future clarifications on the potential impact.

**Section 5** also includes proposed changes to requirements for restoration and commercial planting. For restoration, there is no longer a requirement to use native species. The rationale for this is to recognize that some native species may not be the most appropriate to plant given the changing climate. We understand the argument, but there are also significant risks. While the planting of non-native species can support climate adaptation, it also poses risks such as maladaptation, ecological disruption, disease spread and cultural conflicts. Assisted migration requires careful planning and monitoring. Further clarification on the planting of non-native species, along with a clear guide for risk management, would be beneficial. Therefore, at this stage, without proper justification, we are concerned that introducing non-native species could harm ecosystems.

For commercial forests, using invasive alien species is no longer allowed. Banning alien species from the project is beneficial for maintaining environmental integrity, but we note that the consequences of the change are not clearly stated, including how the change affects projects that have already planted alien species. Whether these should be replaced and what the alternatives are should be clarified for project participants.

We also note that the ecological integrity of restoration of natural forests is dependent on the appropriate use of native plant species. Our understanding is that for removals generated from natural forest restoration, (restoration of what was previously forest lands), the requirements of the standard including its definitions (in the 2.0 version), in combination with implementation of Cancun safeguard E, offers an adequate level of environmental integrity.

It is unclear to us how the requirements of safeguard E can be met when planting of commercial forest on previously forested lands. Some reference to external,

authoritative guidance as to how this could be achieved could be welcome. Possible guidelines to include are:

- International principles and standards for the practice of ecological restoration<sup>1</sup>
- Guidance for using the IUCN Global Standard for Nature-based Solutions<sup>2</sup>
- **HFLD (Section 5)**

The most significant revision pertaining to the High Forest Low Deforestation (HFLD) module in TREES 3.0 is found in Section 5, where there has been a change to the rules for removals (see feedback above).

In addition to this, we would like to reiterate some of the points raised during the TREES 2.0 consultation, when the HFLD-adjustment was first introduced. Rather than restating them here, we kindly refer to our [previously submitted feedback](#), which also remains relevant in the context of the current revision.

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[https://cdn.ymaws.com/www.ser.org/resource/resmgr/custompages/publications/ser\\_standards/standard\\_pdfs/english\\_standard\\_s\\_2nd\\_ed\\_eng.pdf](https://cdn.ymaws.com/www.ser.org/resource/resmgr/custompages/publications/ser_standards/standard_pdfs/english_standard_s_2nd_ed_eng.pdf)

<sup>2</sup> [Guidance for using the IUCN Global Standard for Nature-based Solutions](#)

- **Technical feedback, questions and clarifications**

| <i>Reference - Context/ Content</i>   | Specific comment, suggestion or other feedback  |
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| <p>2. <i>ART Cycle</i></p> <p><i>Proposed change:</i> Extend the public comment period up to 60-days.</p>                                     | <p>We suggest considering extending the public comment period even further, up to 90-days.</p>  |
| <p>3.1.2 <i>National Reporting Requirements</i></p>   | <p>The standard states that ‘national government Participants must demonstrate conformance with Cancún Safeguards related requirements, including how they have addressed and respected the safeguards. We would welcome further work on how well the current requirements have worked to ensure robust implementation based on the experience to date with reporting under this requirement. This also to avoid the perception that a BCB certification is needed to ensure robust implementation of the safeguards.</p> |
| <p>5. <i>Crediting Level</i></p> <p><i>Proposed change:</i> Clarify that removals must be connected to the Participant’s REDD+ activities</p> | <p>We are supportive as this would contribute to important interlinkages in holistic land use planning</p>  |
| <p><i>Proposed change:</i> Require commercial forest to exclude invasive alien species</p>  | <p>We are supportive.</p>   |
| <p><i>Proposed change:</i> Remove native species from the definition of natural forest restoration</p>  | <p>We encourage ART to keep the requirement of using native species on natural forest restoration.</p>  |
| <p>12. <i>Environmental, Social, and Governance Safeguards</i></p> <p><i>Proposed change:</i></p>   | <p>We recommend using the term “Indigenous Peoples in Isolation and Initial Contact” instead of “uncontacted peoples”, which refers to Indigenous groups who choose to live without</p>   |

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| <p>Explicitly include Afro-descendant Peoples, transhumant communities and uncontacted peoples</p>                            | <p>contact with the outside world or are in the early stages of it.</p>  |
| <p>Structural changes</p>   | <p>The “Scope” section has been removed, but its content appears to be more clearly integrated and presented in the “Reporting Requirements” section. Merging “Structure” and “Process” indicators appears to reduce overlap and the risk of confusion on difference between the two types. We note that there is still some variation in the description of the Outcome indicators, which may lead to reporting on “processes” rather than using parameters which actually measure the “outcome” of such processes.</p>   |
| <p><i>12.4.5 Cancun Safeguards</i></p> <p><i>Proposed change:</i></p> <p>Clarify that the Safeguards go beyond do no harm</p> | <p>We are supportive of this proposed change and believe this is as a natural consequence of the wording of the adopted safeguards. An appropriate example is Cancun Safeguard E and the following <i>‘That actions are consistent with the conservation of natural forest and biological diversity, ensuring that the actions....(ref REDD+ activities) are not used for the conversion of natural forests, but are instead used to incentivize the protection and conservation of natural forests and their ecosystem services, and to enhance other social and environmental benefits’.</i></p> |
| <p><i>Cancun safeguards A, theme 1.2</i></p>  | <p>We would like to emphasise the relevance of complementarity and consistency with national strategies and action plans pursuant to article 6 in the Convention on Biological Diversity and the Kunming Montreal Global Biodiversity Framework.</p>   |

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| <p><i>Cancun safeguard E, theme 5.2</i></p> | <p>Further to the proposed change by the secretariat in the row above: we do not believe that the indicators under theme 5.2 is an accurate reflection of Cancun safeguard E. The indicators do not capture the important proactive element on 'incentivize the protection and conservation of natural forests and their ecosystem services', but only the last part of that safeguard on 'enhancing environmental benefits'. We also see the changes in this part from the 2.0 version of the standard to the 3.0 draft standard as a weakening on this point. The indicators must hence be updated to capture this important aspect of Cancun safeguard E.</p> |
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