
Terra Global Comments on TREES 3.0 Public Consultation

September 30, 2025

Terra Global has been a strong proponent of TREES and ART's commitment to supporting REDD+, and we thank ART for receiving these comments. Working with governments and local communities, we have developed numerous REDD+ activities at both the project, jurisdictional and national levels. We have seen the power of climate finance support governments and local communities in forest conservation, alternative livelihood development and food security and we look forward to applying TREES 3.0. Please see our comments below.

1 Introduction

- **Further clarify responsibilities of the ART Board and ART Secretariat**

Clearly the ART Board is full of very qualified participants. But it seems that some of the decisions that impact the standards do not take into account the realities of countries needed to attract private sector climate finance or the requirements of investors themselves.

2 ART Cycle

- **Clarify that the TRD and TMR do not need to be submitted concurrently**

Yes, we believe that this is good practice to be able to submit them separately. As these are different steps it worthwhile to show progress.

- **Clarify that credits are issued after the Participant requests issuance and issuance fee is paid**

Yes, this new text is clear.

- **Clarify that vintages are based on calendar year**

Having vintages based on calendar year can be difficult for accounting but will be helpful for buyers and keep consistent with emission years. This new requirement will keep consistent with Verra as well.

- **Clarify the process for Participants seeking to rejoin ART**

This new text is clear and helpful.

- **Require the TRD and TMR to also be submitted in any official language of the Participant**

This is a good improvement for transparency.

- **Require submission of the TREES Registration Document within two calendar years of the acceptance of the TREES Concept**

This is a good improvement for transparency.

- **Lengthen the comment period on Participant documents to 60 days and explicitly require Participants to notify stakeholders**

This is a good improvement for transparency.

2.1 Additional comment regarding the mechanics for baseline reset

The process of renewing the crediting period is not defined in the standard. In the Section 1.1 it states “Set crediting baselines for deforestation and degradation that initially reflect historical emission levels and thereafter decline periodically to require higher ambition over time.” But the exact method is only referred to loosely in section 2.3, and then it says see section 2.2 really has nothing.

Based on the past discussions we have had with the ART Secretariat, it was clarified that when the crediting level must be reset, that the prior 5 years of historical data will be used. If this is the case if a government had reduced deforestation from historical 2% per year to 0% per year, the new crediting baseline would be zero. In some places where permanent and lasting changes can be put in place during the first period to stop deforestation this approach might make sense. But in countries where the major drivers of deforestation are subsistence based, while you may have been successful in reducing deforestation in the first period, those drivers and agents remain active and in fact increase due to population growth.

Therefore, you cannot use the past historical 5-year deforestation to reset the crediting baseline. There must be a mechanism under which if drivers are still present that the baseline should refer to the pre-program deforestation rates. There can still be some portion of crediting baseline reduced to increase ambition, but the current method does not reflect the realities of what happens on the ground to cause deforestation year over year.

3 Eligibility, Applicability, and Key Requirements

3.1 Clarify that Participants may name another organization or individual as an Agent in the ART process

N/A

3.2 Extend the period for subnational accounting through December 31, 2040

The sunset provision for subnational, being extension to 2040 is a step in the right direction. But it still does not meet the requirements for investors or governments.

This should not be a set date (e.g. 2040), but a period of 10 years from the Program start date. Private sector Investments in JREDD+ programs are generally not repaid their investments until between 7-10 years. And an investor will not take the risk that their crediting might change significantly when it moves from sub-national to national. Or that credits might not be able to be issued at all.

In addition, when subnational governments have authority over their forests and/or to regulate emissions, they should not be forced to merge into the national government TREES. Can you imagine telling the State of California to merge into the US Federal system for generating emission reductions from activities in Californias forests. This makes no sense.

There should not be a requirement to have a minimum of 2.5 million hectares of forest in a subnational area, this greatly limits the opportunities for action by subnational governments. While it makes sense to incentivize action at scale, in areas where deforestation has been high and the remaining forest area is low, these should not be eliminated from eligibility. And it costs a lot to actually implement a program across a 2.5 million area. If there must be a minimum set we suggest it should be 1 million hectares.

This statement “Subnational jurisdictions may not aggregate as direct subnational participants, however, they may aggregate as part of a national government submission of a subnational accounting area” is unclear. Is this saying that you cannot group subnational participants who are seeking to work together into one program? If so, this makes no sense. Again, this limits climate finance opportunities for subnational governments. And while you have gone out of your way to make exceptions for IP land (which is great), there is no logic that this should be allowed to register groups of subnational governments.

3.3 Clarify the requirements for subnational governments to receive authorization from the national government

The requirement for subnational governments to notify the national government seems reasonable.

But there is too much ambiguity in how a subnational government would “demonstrate inherent authority via law, statute or resolution to participate in ART”. And further who would assess this. Given the lack of carbon laws in many countries, there should be guidance provided on how a subnational government can prove this. Metrics might include:

- The degree to which local governments can enforce national or regional forestry laws.
- The authority local units have over operational duties like issuing permits for forest use.
- The capacity of local government staff, including technical capabilities and training in forestry management.
- The ability of local governments to collect, retain, and spend revenue generated from forest resources.
- The level of financial transfers from the central government for forestry-related services.
- The fiscal autonomy of local units to budget for their own forestry priorities
- The authority of local elected officials to make decisions about forest use and management.
- The level of engagement between community-based organizations and local government officials.
- The presence of forums or procedures for resolving forestry-related conflicts at the local level.
- Voting processes and participatory engagement indicators that measure the distribution of power among different actors.

But this cannot be left unclear or uncertain or to the validation process. And whoever will be making this determination needs to have the skills.

3.4 Provide a time-bound transition pathway for Forest Carbon Partnership Facility (FCPF) Carbon Fund and Readiness Fund Participants to join ART with unique eligibility criteria

The ability for Carbon Fund countries to transition to ART is very valuable. But the proposed rules under Section 3.1.3 are far too vague.

These questions are critical yet unanswered to determine how this would work exactly:

- ...“these governments may meet the eligibility requirements outlined above or may use the following eligibility requirements”, what does this refer to as “above”. The section before does not make sense, what is exactly meant? Does this mean the subnational area requirements or something else?
- This sets out some conditions under which Carbon Fund participants that do not meet the ART subnational requirements to have 1 crediting period to comply and FCPF readiness fund countries have 2 crediting periods, and a lower minimum size (1 million), but it this the only thing that allows for in the transition? Do they still have to meet all the ART GHG

quantification and other requirements or can they keep using the FCPF methodological framework.

3.5 Clarify the required elements of the REDD+ Implementation Plan

It is good to require a REDD+ implementation plan. The requirement to use the National REDD+ Strategies/Action Plan will not provide the detail needed to understand what is actually happening on the ground as these are often “pie in the sky” documents. They do not take into account, what there is actually funding for and when and how this might link to drivers. It would be better to require a detailed workplan for the crediting period, that is clear on target areas for implementation which is similar to what is required for subnational governments show how it aligned with the National REDD+ Strategies/Action Plan.

3.6 Clarify how and when the Participant must demonstrate its rights to emissions reductions and removals

This is a super important requirement and needs to ensure that governments cannot easily “sovereignize” carbon rights of legally registered land tenure holder in the country and issue ART credits.

This requirement should be expanded and directly state that in cases where legal land tenure and natural resource rights have been devolved to private parties, Indigenous Peoples, Local Communities, Afro-descendant Peoples, other stakeholders or subnational entities that government must show an existing law that clarifies carbon ownership or where this does not exist, the government must get written authorization from the tenure holders using FPIC to be able to issue any carbon credits on these areas. It seems like the intent to this rights section is to do this, but it falls short in the protections it needs to provide these tenure holders.

3.7 Require explicitly that Participants provide a description of the benefit sharing arrangements, including demonstrating conformance with relevant safeguards

This is a very valuable requirement, but the level of granularity required we believe is too low. For the program, it should be required to provide a detailed BAP. And that key details are disclosed in the initial documentation and on-going at each verification.

The requirements should include:

- Not only groups eligible, but how their eligibility is accessed to actual receive benefits
- Not just principles and criteria of allocation but the details of each method for how all the carbon revenue is used and allocated to all participants.
- It should require financial projections of the allocations to each set/group of recipients.

3.8 Revise the explanation of the additionality of TREES, including each of the three crediting approaches

No comment, expect that related to the resetting of the crediting levels.

4 Carbon Accounting

4.1 Emissions Accounting Requirements

4.1.1 Activity Data

- **Clarify definition of non-anthropogenic emissions**

This language operationalizes the existing cross-reference to IPCC guidance (p.30) and its footnote definition of natural disturbances, ensuring consistent application, transparent documentation for VVBs, and alignment with IPCC good practice.

v3.0 addition of the IPCC footnote is a step, but to avoid inconsistent application it still needs more clarity as an explicit definition and operational screening/reporting requirements embedded in the standard text, not just a cross-reference.

- **Clarify the requirements for emissions activity data and provide additional references for good practices**

Version 3.0 materially improves clarity in section 4.1.1 Activity Data by tightening documentation, sampling/mapping integration, calendar-year alignment, and planted vs. natural separation. It addresses several questions (replicability, when maps can be used directly, what to hand the verifier), but could go further with minimum accuracy and cloud handling rules to reduce interpretation variance across jurisdictions.

4.1.2 Emission Factors

- **Clarify that biomass maps may be used to derive emission and removal factors**

Overall, v3.0 improves clarity in emission factors by recognizing biomass maps, describing how post-emission stocks are handled, specifying on 5-year optional (justifiable) updates, and strengthening uncertainty references.

4.2 Removals Accounting Requirements

- **Clarify that Participant may determine that emission and removal factors do not need updating every five years**

Version 3.0 makes it explicit that, after the 5-year reevaluation, a participant may decide **NOT TO** update emission factors, if that decision is explained and justified in the TREES documentation. In

v2.0 the text only said emission factors “shall be reevaluated and where necessary updated every five years,” without stating that participants could determine no update is needed.

- **Separate and clarify requirements for removals activity data**

Version 3.0 section 4.2 improves clarity on removals activity data; however, the application of the long-term average (LTA) in systems that include harvesting remains ambiguous and could lead to inconsistent treatment across Participants and VVBs. Add operational guidance for LTA in harvested systems would further improve clarity.

4.3 Scope of Activities

- **Allow HFLD jurisdictions to claim removals if emissions are within 15% of their TREES Crediting Level**

In HFLD places where yearly emissions bounce around at low levels, the $\leq 15\%$ tolerance avoids punishing a good program for a small, temporary uptick while it’s delivering real removals: enhancement or regrowth. A good additional provision to increase transparency would be to require a segregation of ERs to CL, removals, deductions, buffers each year is applied.

- **Allow emissions from peat to be calculated using Tier 1 methods if emissions are low and peatlands are less threatened**

Compared to v2.0, v3.0 does improve clarity by writing the peat Tier-1 allowance into the text and by setting clear numeric conditions for when it’s acceptable. The dual threshold (<3% share and low peatland deforestation rate) is a pragmatic integrity check.

5 Crediting Level

5.2 Calculating a Trees Crediting Level for HFLD Participants (Optional Approach)

- **Remove bounds for calculating an HFLD score**

Removing the bounds in the text of section 5.2.1 of v3.0 doesn’t have any material difference with the previous version as the HFLD score is calculated using the same equation and has the same condition of HFLD score required to be 0.5 or higher.

- **Move HFLD Penalty Deduction calculation to Section 10**

No material difference, no comments.

- **Remove option for HFLD jurisdictions to claim avoided foregone removals**

Estimating AFR required extra assumptions (growth curves, age/stock dynamics for “would-have-been-deforested” stands). Removing it reduces uncertainty. The exclusion of this option is more conservative.

5.3 Calculating a TREES Crediting Level for Removals

- **Allow HFLD jurisdictions to claim removals if emissions are within 15% of their TREES Crediting Level**

Compared to v2.0, which did not allow removals for HFLD (except with AFR), v3.0 “within 15%” rule still gives credit to places that stay close to, or better than, their baseline. The possibility of including removals increase accuracy of calculations.

- **Clarify that removals must be connected to the Participant’s REDD+ activities**

Version 3.0 creates an explicit eligibility condition: removals must be caused by the Participant’s REDD+ program, not just occur within the boundary. That helps proving additionality and increases market confidence.

- **Remove the market purpose from the definition of commercial forest and natural forest restoration**

Commercial purpose is hard to verify and can change over time. Classifying by what’s on the ground and how it’s managed is cleaner.

- **Require commercial forest to exclude invasive alien species**

Good improvement as increases ecosystem health safeguard.

- **Remove native species from the definition of natural forest restoration**

Allowing non-natives (when justified) requires further species risk assessment and long-term monitoring.

- **Clarify how previously restored natural forest areas should be included in accounting**

The update is pragmatic. It aligns credits with real, measurable carbon gains from recent restoration, this is the kind of conservative flexibility HFLD programs need.

- **Specify that the areas of commercial forest that exceed the crediting level must be those with the lowest removal factor**

It is a conservative choice to only allow programs to issue credits from commercial reforestation on areas that exceed the historical reforestation average, and to require that programs use the least carbon dense strata removal factor.

- **Move the requirements for the ongoing removal stratum to Section 4**

No comments

6 Monitoring

None

7 Reversals and Leakage

- **Move the equations for calculating buffer pool contributions and leakage deductions to Section 10**

The changes in sections 7.1.2 and 7.2.1 make the sections clearer and having all the equations in section 10.4.1 means that all the steps in quantifying emissions are in one place.

- **Require Participants with a reversal to use a 30% buffer pool contribution for 5 years following the reversal**

We understand the need to increase requirements in terms of risk calculation in section 7.1.3 when a reversal occurs, and we believe that the measures are appropriate. However, we would like to propose that section 7.1.3 differentiate between avoidable and unavoidable reversal. That way, projects that have an unavoidable reversal could access the previous version option, in which mitigation factors could continue to be used to reduce the risk buffer percentage.

“Definition

Avoidable reversal

A reversal event over which the project participant has influence or control.

Unavoidable reversal

A reversal event is one over which the project participant has no control, such as hurricanes, earthquakes, floods, droughts, fires, tornadoes, and winter storms, as well as events caused by humans, such as acts of terrorism, crimes, or wars. It also includes events such as logging, mining, or extraction of living material from the forest over which the participant has no control and which is properly documented (e.g., problems with civil wars or invasions).

Reversal Compensation

Avoidable reversal

“After each reversal is reported, a Participant must increase its buffer contribution for a period of five calendar years by 5%, added to the buffer contribution assessment scoring for those years. Further, if the number of credits retired for the reversal exceeds the number of credits contributed to the buffer to date by the Participant, this deficit must be replenished by the Participant. If the Participant does not have sufficient credits already issued into its account, future credits issued to the Participant will be placed into the buffer until the excess amount is replenished.”

Unavoidable reversal

“After each reversal is reported, a Participant must increase its annual buffer contribution for a period of five calendar years by 5%, added to the buffer contribution assessment scoring for those years. No mitigating factors may be claimed for five years following the reversal to permit time for substantive changes to be documented and verified as being successful. The buffer pool contribution based on the risk assessment must be 25% for the 5 calendar years following a reversal. When added to the required 5% increase in buffer pool contribution following a reversal, this equals a 30% buffer pool contribution for 5 calendar years following the reversal.”

- **Clarify the requirements for Participants entering ART with a known reversal**

The requirements in section 7.1.3 regarding participants in the first monitoring reporting a reversal are clear; however, to make them clearer, they should be included in new subsection 7.1.3.1 so that new participants can identify them correctly.

8 Uncertainty

8.1 Require uncertainty to be assessed separately for emissions reductions and removals

This makes sense as the uncertainty for sources of removals will be different than the sources of reductions.

8.2 Clarify requirements for issuing additional credits if the 5-year uncertainty value is lower than the annual uncertainty value

The requirements are clear

8.3 Move the equation for calculating uncertainty deductions to Section 10

This move makes sense as the rest of the deductions are calculated in this section and the GHG ERt is needed to complete the calculation, which is not available until this step in the process.

8.4 Separate the calculation of the uncertainty adjustment factor for emissions reductions and removals

Again, this makes sense as the uncertainty for sources of removals will be different than the sources of reductions.

9 Emissions Reductions and Removals Labeling

9.1 Clarify additional labels for TREES Credits on the ART Registry

This will be very helpful. The language is not very clear, but please make sure that reductions and removals are separately labelled too.

10 Calculation of Emissions Reductions and Removals

- **Separate equations for initial removals from commercial forests and natural forest regeneration**

The changes in section 10.3.1, with the separation of initial removals, it becomes easier to track the contributions from Commercial Forest, Natural Regeneration and initial GHG removals. The separation of initial removals, it becomes easier to track the contributions from Commercial Forest, Natural Regeneration and initial GHG removals.

- **Simplify equations for inherited and ongoing removals**

The simplify equation for inherited an ongoing removal in section 10.3.1, Equation 16, reduce redundancies consolidating in two categories: initial and ongoing. But it requires attention to explain the rules of eligibility; initial strata (restoration up to 10 years before the start) vs. Ongoing areas (new additions during the period).

- **Separate equations for emissions reductions and removals**

The changes in sections 10.3.1 and 10.3.3, the separate equations for emissions reductions and removals, this allows reporting how much emissions and removals are.

- **Include deductions for ERRs from other initiatives or for which Participant doesn't have the rights in the equations**

The changes in section 10.4.1 enhance robustness by ensuring that the credits truly correspond to additional and attributable reductions or removals by the participant. It requires greater rigor for carbon rights, resulting in increased documentation requirements and institutional coordination.

- **Apply the buffer pool contribution after other deductions**

The changes in sections 10.4.1 and 10.4.2. Introduce a new structure that facilitates demonstrating that the buffer exclusively represents the participant's results which is essential for reversal replenishment and compliance with demanding audit and market standard.

11 Variance

- **Clarify that variances only apply to a specific crediting period**

This clarification is good, and clear in the text.

12 Environmental, Social, and Governance Safeguards

- **Clarify that the Safeguards go beyond do no harm**

The clarification is appropriate.

- **Combine Structure and Process indicators into a single Structure and Process indicator**

The combination is helpful and will streamline monitoring.

- **Clarify reporting requirements and timeline for all indicators**

Requirements and timelines are clear.

- **Remove Section on Scope**

Makes sense.

- **Revise the description of the indicators to simplify language**

Simplified descriptions support clarity and straightforward reporting.

- **Explicitly include gender, youth, and vulnerable groups in key themes**

Great addition.

- **Clarify difference between Themes 4.1 and 4.2**

The clarification is clear.

- **Explicitly include Afro-descendant Peoples, transhumant communities and uncontacted peoples**

Very important and appropriate.

- **Clarify which themes relate to the distribution of benefits**

Clear.

13 Avoiding Double Counting

- **Clarify the requirements for deducting verified ERRs from other CO2e-based initiatives from the TREES issuance volume**

More clarification is needed on the following text “For some GHG programs, this may include the uncertainty or reversal buffer pool credits if these credits can eventually be returned and transacted by the project or Participant.” Please clarify what “some GHG programs” means.

More clarification is needed on the following text: “Removals credits must only be deducted from the TREES volume if they correspond to the same location as the areas of removals presented by the Participant (see Section 4.2.1).” There may be large forest areas where the forest is increasing in biomass due to activities of the TREES Program (e.g. social programs that educate and encourage people to stop harvesting/deforesting in a Jurisdictional Area, patrolling to stop forest fire, reduced instances of degradation through zoning etc.). This could also be happening at a project or site-specific level within the jurisdiction, or the Jurisdiction has not zoned this area as a “Removals stratum”. These activities may cause the forest to increase in biomass and therefore have removals. Section 4.2.1 and 13 should clarify what “Removals stratum” means.

- **Specify that variances may be submitted for these requirements**

This text on the Variance procedure and the use of the TREES Variance Request Form template is now clear.

- **Clarify requirements for corresponding adjustments**

The requirements for corresponding adjustments is clear along with the Host Country Letter of Authorization.

14 Validation and Verification

None

15 Registry Requirements

None

16 Complaints and Appeals

- **Revise complaints and appeals process**

This text on the appeals process is clear, but there should be a process for submitting an anonymous complaint to ART.

The following text describes the process:

“To submit a complaint, the Complainant sends a written complaint via email to [redd@winrock.org](mailto:red@winrock.org). The complaint must detail the following:

1. Description of the eligible complaint with specific reference to TREES requirements that were not followed;
2. *Complainant name, contact details, and organization; Description of the harm or imminent harm to the Complainant; and*
3. Supporting documentation provided for consideration by the reviewer in the complaint resolution process.

In instances where a Complainant wishes to remain *anonymous from the ART Participant or other external stakeholders*, ART shall make appropriate accommodation providing that the identity of the Complainant must be made known to ART and to the reviewer.”

Please note that this process is NOT anonymous – a entity/individual may have a complaint against the ART or an ART employee. This person should be able to submit a full complaint to ART anonymously. This process should be documented here.

16.1.1 Annex A

None

16.1.2 Annex B

- **Clarify requirements for the Letter of Authorization**

This next is helpful and clear.

- **Clarify requirements in case of a change in authorization**

This next is helpful and clear.

- **Remove example Letter of Authorization**

An example of the letter of Authorization is helpful. It looks like TREES is ADDING an example of the letter of Authorization as a link to the UNFCCC website (<https://unfccc.int/documents/646071>). For clarity the standard can say “Use the **Voluntary standardized template for the authorization of the use of the internationally transferred mitigation outcomes from a cooperative approach (Word) (v.01.0)**”.

An example of the letter of Authorization is helpful. We recommend keeping the example of Letter of Authorization for clarity.

16.1.3 General

- **Correct errata**

This text is now clear.