

**From:** [Aude CARRO](#)  
**To:** [Mailbox, REDD](#)  
**Cc:** [Rémi DUVAL](#)  
**Subject:** Comments on TREES 3.0 draft  
**Date:** Monday, September 22, 2025 9:15:36 AM  
**Attachments:** [image001.png](#)

---

You don't often get email from aude.carro@totalenergies.com. [Learn why this is important](#)

**CAUTION:** This email originated outside Winrock. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear ART Secretariat,

Thank you for the opportunity of providing feedback on TREES 3.0.

Please find below the clarifications we would welcome to see in the final version.

Kind regards,

Aude

1. Transition from FCPF to TREES (Section 3.1.3): “Current FCPF Carbon Fund Participants may use their FCPF accounting area for one crediting period if they have a TREES Concept accepted by ART no later than December 31, 2028 [...] Participants (national or subnational) located in FCPF Readiness Fund countries may join ART with special eligibility criteria for at most two crediting periods if they have a TREES Concept accepted by ART no later than December 31, 2028.”
  - Does it mean that FCPF Carbon Fund and Readiness Fund participants that have a TREES Concept accepted no later than 31/12/28 will be able to issue FCPF credits through the ART-TREES registry for two crediting periods (and if so what procedure will be used for verification)? Or will they have to comply with the TREES standard (i.e. excluding all removals of forest remaining forest)?
  - What are the special eligibility criteria for Readiness Fund countries?
2. HFLD approach (Section 3.5): « The TREES HFLD methodology sets a crediting level based on average emissions from deforestation and forest degradation in the recent past, plus a percentage of the remaining forests’ carbon stock, which is used as a conservative proxy of forest loss across the entire jurisdiction’s accounting area if no REDD+ conservation actions are undertaken.” We would like to ensure we fully understand the rationale for adding an HFLD premium to HFLD jurisdictions crediting levels. Is this premium a proxy to account for rising deforestation and degradation trends at the global level that are not captured in the 5-year historical baselines? If not, what

baseline does it reflect?

3. Removal crediting level (section 5.3.):

- “Annual areas converted from non-forest to forest during the crediting period that exceed the 5-year historical average are eligible for crediting.” Are the eligible removal areas over the first crediting period carried over to the next crediting periods to continue taking into account their incremental growth? If so, how long can these areas be carried over (e.g. for how long can removals be claimed after reforestation/plantation in a given eligible area)?
- “All new areas of natural forest restoration reported under ART are eligible for crediting; and, upon entering ART the incremental growth that occurs during the crediting period, on all areas of natural forest restored up to ten (10) years prior to the start of the crediting period start date is eligible for removals crediting.”. Since the performance-based approach is not applied to new or 10 year lookback natural forest restoration, how is the additionality of these credits demonstrated? Are the new and 10 year legacy reforestation areas carried over to the next crediting periods, and if so for how long? In case a jurisdiction does not exceed the removal crediting level on any year of the first crediting period (e.g. not making any additional removal compared to the 5 year baseline or any new reforestation area), can it still claim removal credits on the incremental growth of the 10 year legacy reforestation areas?



**Aude Carro**

Carbon Expert – Nature Based Solutions

Exploration & Production  
New Business - Carbon Neutrality (NB-CN)

**TotalEnergies SE**

2 place Jean Miller – Arche Nord Coupole/Regnault  
92078 – Paris La Défense Cedex – FRANCE

M. : +33 (0)6 17 98 72 87  
[aude.carro@totalenergies.com](mailto:aude.carro@totalenergies.com)