

## Public Comment Period: TREES 3.0 draft.

Comments provided by UNFCCC

### 1) Main comment: Immutable Principles

It is important to foster the actual implementation of the “Immutable Principles” in section 1.2. In particular, Immutable Principle 2 stipulates that ART shall “*Be consistent with United Nations Framework Convention on Climate Change (UNFCCC) Conference of Parties (COP) decisions including the Paris Agreement, Warsaw Framework for REDD+, and the Cancún Safeguards*”.

The Warsaw Framework for REDD+ included in Article 5.2 of the Paris Agreement clearly outlines in Decision 9/CP.19 that for developing country Parties undertaking REDD+ results-based actions, to obtain and receive results-based finance, those actions should be fully measured, reported and verified, in accordance with decisions 13/CP.19 and 14/CP.19, and developing country Parties should have all of the elements referred to in decision 1/CP.16, paragraph 71, in place, in accordance with decisions 12/CP.17 and 11/CP.19.

In order to implement the Immutable Principle 2, it would therefore be required to ensure that all of the required elements are in place. Currently, only the submission of the most recent Summary of Information to the UNFCCC is required in section 3.1.2, which only fulfills one of the five relevant criteria (Decision 1/CP.16, paragraph 71d). Similarly to other processes that align with UNFCCC and the Paris Agreement, consistency could be achieved by introducing eligibility checks that require the inclusion of results from proposed activities in the UNFCCC Lima REDD+ Information Hub, which will contain all results for which all of the requirements have been fulfilled (Decision 9/CP.19, paragraph 9). To enhance transparency, it could further be considered to also require reporting of results-based payments received in the Lima REDD+ Information Hub (Decision 9/CP.19, paragraph 10).

### 2) Technical and editorial comments:

**Section 1.1 (page 12):** “ART shall ... *Be consistent with United Nations Framework Convention on Climate Change (UNFCCC) Conference of Parties (COP) decisions **including** the Paris Agreement.* “

The Paris Agreement is an international treaty, it is not a COP decision. Suggest to reformulate to “Decisions adopted by the UNFCCC and the Paris Agreement Conference of the Parties, including the Warsaw Framework for REDD+ and the Cancún Safeguards”.

**Section 3.6 (page 27):** “*The forest definition or definitions listed in the TREES Registration Document must be consistent with the most recent definition used by the national government in reporting to the UNFCCC.*”

We would note that Parties may report different forest definitions to the UNFCCC, even at the same time. The definition used in the GHG inventory may differ from that used for REDD+ reporting, and it is even possible that a BTR and its technical annex on REDD+, submitted together, could contain different forest definitions. Suggest to clarify that this should be the definition used in reporting on REDD+ results to the UNFCCC (thus, the REDD+ forest reference level/forest reference emission level and the REDD+ results reported in a technical annex to the BTR).

**Section 4.1.2** (page 32): *“Emission factors are the GHG emissions per unit of activity data. Factors shall be the **net carbon stocks** in the post deforestation or post degradation land use (e.g. the carbon stock in land use observed post-deforestation subtracted from the carbon stock pre-deforestation)”*

From the description in bracket, it seems that the factors shall be the net **changes** in carbon stock following deforestation or degradation, rather than the net carbon stocks.

**Section 4.6** (page 38): *“...but the approach used may not be at a lower tier than that used in the national inventory”*

Is it referring to the national GHG inventory submitted to the UNFCCC, a national forest inventory, or something else? This is worth clarifying.

**Section 5.3** (page 44): Equation 6: Commercial Forest Removals Reference Area

An equation to calculate the natural forest restoration Removals reference area is not provided.

**Section 10.3.1** (page 54): *Equation 13. Initial Area of Removals for Commercial Forests*

Shouldn't RACF be expressed in ha/yr, as in eq. 6, rather than in ha?

**Section 10.3.1** (page 55): *Equation 15. Initial GHG Removals for Natural Regeneration*

Shouldn't **ARNR<sub>x,t</sub>** be the Area of **new** natural regeneration removals in stratum x in calendar year t of participation in ART?