

From: [Thales A. P. West](#)
To: [Mailbox, REDD](#)
Subject: Comments on TREES 3.0 draft
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To whom it may concern,

I have a comment about section 3.5 Additionality: historical deforestation averages cannot be used to demonstrate additionality. Consequently, it does not ensure the integrity of carbon offsets—it is merely a convenient way of measuring change.

You should research alternatives ways of estimating additionality if you are concerned about credit integrity—there are plenty of studies on this subject in the literature.

Best regards,

Thales A. P. West, PhD
<http://thaleswest.wix.com/home>