



*The following comments on the LCA Assembly Document (FCCC/AWGLCA/2008/16) are submitted by the Environmental Investigation Agency (EIA), a non-profit 501(c)(3) organization with accredited observer status to the U.N. Framework Convention on Climate Change.*

We welcome the opportunity to make a submission regarding the ideas and proposals presented by Parties and observer organizations on the elements contained in Paragraph 1 of the Bali Action Plan. In regards to “Policy approaches and positive incentives on issues relating to reducing emissions from deforestation and forest degradation in developing countries; and the role of conservation, sustainable management of forests and enhancement of forest carbon stocks in developing countries”, EIA considers that innovative measures to address underlying drivers of deforestation must be a basic element of building the conditions for successful reduction of emissions from deforestation and degradation. Building these conditions will require both improving forest governance on the ground *and* attempting to align international trade in forest products and agricultural commodities with climate policy goals.

Illegal logging and associated global trade in illegally sourced products is one such driver. Illegal logging both causes deforestation and forest degradation directly, and is a basic indicator of weaknesses in forest governance, law enforcement and trade policy.

*→ On general principles related to policy approaches and positive incentives (paragraph 59):*

An effective REDD framework must be underpinned by laws and policies not only in tropical forest countries but also in those countries whose markets generate demand for forest products. EIA wishes to submit the following two proposals:

- (1) That Parties support each others efforts to govern their forests effectively through enacting legislative measures to eliminate trade in forest products produced in contravention of any Parties’ laws.
- (2) That Parties examine other possible measures to ensure that there is coherence between climate and deforestation policy goals and national or international trade policies.

*→ On what should be supported in the areas of capacity-building, readiness and demonstration:*

It is necessary to build on existing initiatives to build governance and combat drivers of deforestation including illegal logging and associated trade, and unsustainable agricultural conversion practices. EIA proposes that support for existing initiatives and laws to combat illegal logging and associated trade, such as Europe’s Forest Law Enforcement Governance and Trade regulation (FLEGT) and bilateral collaboration on enforcement of the United States’ Lacey Act, should be explicitly referenced as a necessary element to underpin any credible REDD framework.