

# Greenpeace submission to SBSTA on Reference Levels for REDD

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Decisions made on reference levels will in large part determine whether REDD will strengthen or weaken the global effort to avert catastrophic climate change. National reference levels that incentivise real permanent emission reductions from historic levels could help close the gigatonne gap that remains from Copenhagen, while projected reference levels could take parties even further away from their commitment to keep global temperature rise below 2°C.

Most discussions on reference levels focus on their usage in phase 3 implementation, while what is needed is a system that will curb all major drivers of deforestation and degradation as quickly and equitably as possible. As such, different types of reference levels could be utilised throughout the phased implementation of REDD. This effort would focus on linking performance appraisal to the implementation of sustainable development policies and measures (SDPAMS), IPCC default values for emission reductions and leakage prevention (including proxies such as the use of Intact Forest Landscapes), as well as the MRV of verified emission reductions from deforestation and degradation.

## Sustainable Development Policies and Measures (SPDAMS)

There remains general agreement that, in most developing countries, the international community should fund a set of REDD-relevant capacity-building actions, policies and measures. Such measures could include forest code reform, moratoria, land tenure maps, strengthening of forest governance, field monitoring, mapping, legal reviews, etc. A very useful description and analysis of options can be found in the World Resource Institute reports: *Beyond Carbon Financing: The Role of Sustainable Development Policies and Measures in REDD and REDD Flags*.

Future financial transfers for many policies and measures should be subject to performance monitoring against a predefined state and objective. This would provide an incentive for governments to adopt transitional measures in the short term in line with their longer-term REDD strategies. For instance, a temporary halt on logging could be met not only with payments for foregone tax revenues, but also with commensurate funding for alternative development schemes (including health services and education) identified by civil society members through a participatory land use planning process. As a rule, such performance-based payment should be commensurate to the cost of implementing policies and measures, as to enable the implementation of 'development policies' meant to primarily benefit forest-dependent communities while minimising windfall profits (and the risks of corruption) to elites.

## Reducing degradation and preventing leakage; IFLs and MSPAs

Rather than accounting for the change in carbon stock to estimate forest degradation, it may be more prudent and cost-effective for developing countries to compare change in condition against a reference forest state from which national degradation levels can be compared within the term of a commitment period.

Intact Forest Landscapes (IFLs) are just such a workable reference state. Recent comprehensive mapping of IFLs now makes it possible to study the degree of intactness of different biomes. The distribution of IFLs reflects differences in the history and intensity of economic development, and therefore GHG emissions from forest degradation.

In developing countries, IFLs are found mainly in the large tropical forests of the Amazon and Congo basins, and in Southeast Asia on the islands of Borneo and New Guinea. Compensating developing countries for maintaining existing levels of IFLs would be a simple method by which emissions from degradation could be reduced, important drivers of deforestation overcome, local and global adaptation benefits protected, and much of the potential REDD leakage addressed.

The Morphological Spatial Pattern Analysis (MSPA) is an innovative tool that distinguishes core forests from edge forests and could potentially act as a proxy for degradation. The MSPA technology has many applications and has been developed and used by the Joint Research Centre of the European Commission, the US Forest Service, USEPA, FAO, IUFRO, and others. With MSPA the development of roads, intense agriculture, etc. serve as strong indicators of forest degradation and act as an early detection system for the transition of forests to other land uses. The idea is that 'edge forests' that are near certain developments (such as large roads, intense agriculture, mining, etc.) are currently impacted or under immediate threat of degradation (and possibly deforestation), while 'core forests' that are sufficiently remote from roads and other 'edges' generally are not under immediate threat. Furthermore, edge forests are already impacted by the effects of fragmentation (so-called edge effects) and fragmentation is usually the first step in forest degradation. An increase in the 'edge forest' area over time (ie change from 'core forest' area to 'edge forest' area) would be considered as a proxy for degradation. Reference levels could be based on initial MSPA mapping and a participatory land use planning process and countries could receive incentives for keeping their 'core forest' areas intact (with a premium for IFLs, a subset of core forests). This could be one through legal designations such as 'protected areas' or 'community forest areas' as well as bans on industrial activities and commercial roads. One benefit of these types of approaches is that the traditional practices of indigenous peoples and subsistent agro-forestry practices would not appear to be equated to the industrial degradation practices that historically lead to larger-scale deforestation (as they would remain in the core forests).

### **Verified emission reductions**

Parties should come to agreement on simple cost-effective methods that will allow them to efficiently measure progress towards the goal of zero deforestation, rather than trying to fully account for carbon in systems that are poorly understood and not well defined. Deforestation rates can be measured reasonably accurately, either on the ground or by satellite. Therefore, efforts to quantify carbon losses from gross deforestation should be based on deforestation rates using nominal carbon values.

Greenpeace supports the use of historic reference levels for purposes of REDD. Such levels should be used whether referring to a country's unilateral REDD actions or to actions funded by the international community (and whether or not REDD is ultimately included as a NAMA). Reference levels should be based upon a 5 to 10 year period of time in order to level out periodic variances.

Reference levels must be national in scope, either as a simple single national reference level or a national reference level, made up of a combination of sub-national reference levels, that cover the entire nation (eg for countries with many islands). Focus should be on each country's gross (not net) deforestation rate to better ensure that REDD contributes to both mitigation and adaptation objectives (and to avoid perverse incentives and the conversion of forests to plantations). Given the need for transparency and accountability, all reference levels (and their underlying data) should be made freely and publicly available and verified by an independent third-party review system.

Greenpeace opposes the use of projected (or forward-looking) reference levels, based on business-as-usual (BAU) scenarios, for purpose of REDD. Such reference levels may not only fail to provide reductions in real emissions, but could potentially increase global emissions if used in the context of a market offset mechanism. Options, such as those described in this document, are needed to ensure that all relevant countries needed to reduce global emissions from deforestation can participate in REDD, particularly those with historically low levels of deforestation. Forest protection and the promotion of non-destructive alternatives should be geographically prioritised according to carbon and biodiversity values, as well as the rights and needs of indigenous peoples and forest communities.

### **Zero deforestation: Each country does its fair share**

Ending deforestation is a global imperative. Within the context of REDD, this requires that countries commit to a process and timeline that will protect their intact forest landscapes and bring their gross emissions from deforestation to zero by a predetermined date. Incentives should be provided for incremental progress towards that goal in a manner that protects biodiversity and fully respects the rights of indigenous peoples and local communities. Small-scale culturally and historically significant practices of indigenous peoples could be protected through a pre-determined percentage exclusion to such goals (which seems consistent with the concept of IFLs and the Amazon Pact for Zero Deforestation). All countries should ensure that their financial and demand-side contribution to deforestation is zero.

Countries interested in receiving REDD funds should identify their own unilateral commitments to protecting their tropical forests. Each country should, relative to their economic and other national circumstances, make a fair effort to reduce their deforestation and degradation emissions relative to their historic (not BAU) levels. Countries without significant historic deforestation emissions should identify the anticipated results of the SDPAMs and IFL protection strategies in their National REDD Plan relative to their historic reference level. Such plans should result from a transparent multi-stakeholder process that enables the full and effective participation of civil society members.

## Conclusion

An aggressive global effort on REDD could potentially end deforestation prior to the use of costly and uncertain full carbon accounting methodologies that would be needed for certain phase 3 proposals. Such an effort would be most consistent with the objective to keep global temperature rise below 2°C given the gigatonne gap that remains after Copenhagen. One of the greatest threats that remain to such an effort is the use of projected or inflated baselines, which could deliver non-additional (or 'fake') emission reductions, particularly when combined with a market offset mechanism. Rather, historic reference levels and funding approaches are needed that recognise both the mitigation and adaptation benefits provided by the world's remaining tropical forests and provide incentives to countries for keeping these forests intact. The approaches above outline a simple and effective pathway that collectively could ensure that deforestation and other destructive forest practices are ended in our lifetime.

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