Submission of the United States of America

SBSTA work program for REDD+
(Appendix II of 1.CP/16 and Annex II of FCCC/SBSTA/2011/L.14)

September 26, 2011

At the Cancun COP in December 2010, the Parties agreed to a COP decision that included an ambitious multi-part agenda for the path forward on REDD+ under SBSTA. As outlined in Appendix II of decision 1/CP.16, the five components of the REDD+ SBSTA work program are land use, land use change and forestry activities; reference levels and reference emission levels; forest monitoring; measuring, reporting and verifying; and information systems for safeguards.

At SBSTA 34 in Bonn, the parties called for submissions on all components of Appendix II, and provided guidance for the submissions on reference levels, MRV, and safeguards systems.

In this submission the United States shares its views on outcomes for the 17th session of the COP in Durban, and on the components of Appendix II of 1.CP/16.

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The United States recalls that the Decision adopted by the Conference of the Parties in Cancun affirmed Parties should collectively aim to slow, halt and reverse forest cover and carbon loss, and encouraged developing country Parties to contribute to mitigation actions in the forest sector by undertaking the following activities, as deemed appropriate by each Party and in accordance with their respective capabilities and national circumstances:
(a) Reducing emissions from deforestation;
(b) Reducing emissions from forest degradation;
(c) Conservation of forest carbon stocks;
(d) Sustainable management of forests;
(e) Enhancement of forest carbon stocks;

So that REDD+ is contributing positively to the global efforts to address climate change, while recognizing that consistency with other elements of the negotiations ongoing under the UNFCCC, we consider the following to be achievable, and would support their inclusion in a decision at the 17th session of the COP in Durban:

On systems for providing information on how safeguards are addressed and respected: Parties should agree to guidance on systems for providing information on how the safeguards referred to in Appendix I of 1.CP/16 are being addressed and respected throughout the implementation of the activities referred to in paragraph 70 of the same Decision, including characteristics, design, and provision of information.

On modalities relating to forest reference levels and forest reference emission levels: Parties could identify the scope and purpose of forest reference levels and forest reference emissions levels, and provide guidance on the characteristics, construction, and communication on the same.

On modalities for measuring, reporting, and verifying: The United States would see reporting on MRV for REDD+ to be part of Parties' broader reporting requirements. Biennial reports will include information on mitigation actions for all countries. To the extent a country includes REDD+ in their mitigation actions, those activities should be reported, consistent with biennial reporting guidelines, and any further specific guidance that may be developed for REDD+. Reflecting this, we would want to see an outcome noting that Parties should report on national REDD+ actions and associated emissions reductions, and methodologies and assumptions used in national-level measurement as an inherent part of reporting on mitigation actions through national communications and biennial update reports.

On modalities for forest monitoring systems: We note that the forest monitoring systems modalities identified in decision 4/CP.15 are sufficient to provide a basis for Parties to move forward on other elements of the workplan at this point; this decision should be reaffirmed by the Parties in Durban.

On land use, land-use change and forestry activities in developing countries as referenced in Para (a) of Appendix II of 1/CP.16: The United States recognizes that understanding and addressing the drivers of deforestation and forest degradation, including agriculture, are extremely important in the context of REDD+. We support the development of a workplan leading up to an agreement at COP 18 on this issue, potentially including studies or expert meetings on key drivers and potential solutions; potential contributions of improved land use to mitigation; and applying IPCC guidance to address methodological issues to estimate emissions and removals resulting from these activities.

General guidance for submissions and future work regarding: guidance on systems for providing information on how safeguards referred to in appendix I to decision 1/CP.16 are addressed and respected; modalities relating to forest reference emission levels and forest reference levels; and modalities for measuring, reporting and verifying, as referred to in appendix II to decision 1/CP.16

1. Guidance on systems for providing information on how safeguards are addressed and respected:

(a) Characteristics;
- Coverage of all the safeguards as listed in Appendix 1 of Decision 1 of COP16, summarized here as:
    - Complementarity or consistency with objectives of national forest programmes and relevant international conventions and agreements;
    - Transparent and effective national forest governance structures;
    - Respect for the knowledge and rights of indigenous peoples and members of local communities;
    - Full and effective participation of relevant stakeholders, in particular indigenous peoples and local communities;
    - Actions are consistent with the conservation of natural forests and biological diversity;
    - Actions to address the risks of reversals;
    - Actions to reduce displacement of emissions.
- Recognition that different processes or systems may be required to collect data on different safeguards.
- Empirical data based – the system should use process and outcome indicators where those make sense.
- Quality of information – robust methods, QA/QC documented, metadata on how data were collected.
- Ongoing information collection and provision – systems and capacities maintained or improved over time.
- Efficiency and simplicity so that information collection and sharing fits, to the extent possible, in existing institutions and processes.
- Transparency of data collection, sharing of information, and opportunities for stakeholder review – this will increase credibility and accuracy.
- Participatory in nature – involving affected stakeholders and local experts in design and implementation of the system.
- We expect that Parties will further elaborate their requirements in the context of their broader REDD+ frameworks.

(b) Design;
- We see the phrase "system for providing information" as referring to national systems that should reflect countries' specific circumstances.
- In addition to the characteristics listed above, we believe a "system for providing information on how safeguards are addressed and respected" should include the full and effective participation of stakeholders, in a manner consistent with national sovereignty.

(c) **Provision of information**;
- We feel information on how safeguards are addressed and respected should be reported on in the context of broader reporting on REDD+. The U.S. would consider that Parties undertaking activities pursuant to paragraph 70 of the decision should include this information in their biennial update reports referred to in paragraph 60(d) of decision 1/CP.16, as with other aspects of their activities under this section of the Cancun agreement.
- In their reporting, each Party should provide information on the manner in which each of the safeguards referred to in paragraph 2 of 1/CP.16 is being addressed and respected. We would not consider it sufficient for Parties to pick and choose the elements identified in paragraph 2. Information on how the full and effective participation of stakeholders has been addressed should be included in the reporting.
- Qualitative and, where appropriate, quantitative information showing that safeguards are being addressed and respected should be provided to the Parties in sufficient detail for other Parties to have confidence that safeguards are being adequately addressed and respected.

(d) **Potential barriers, including barriers, if any, to providing information, on addressing and respecting safeguards**;
- We recommend that countries be requested to report transparently on any barriers to addressing/ respecting safeguards.

(e) **Other relevant issues**.
   n/a

2. Guidance for modalities relating to forest reference levels and forest reference emission levels:
(a) Scope and/or purpose;
- For the purpose of this submission document the terms "reference emissions levels" and "reference levels," or REL/RLs, have been used interchangeably. This does not imply a judgment on the definition or use of these terms on the part of the United States.
- REL/RLs provide **benchmarks for estimating changes in net anthropogenic emissions/** removals resulting from REDD+ implementation.
- Should a pay-for performance system emerge, countries that wish to obtain results-based payments may also need to create a type of "incentives baseline," for example adjusted for national circumstances and capabilities, and/or other factors. These baselines may differ from the REL/RLs.
- "Incentives baselines" should be designed so that REDD+ contributes to a real and significant **global net reduction in carbon loss** from deforestation and degradation**, and maintenance or increase in forest cover**.

- Guidelines and definitions for eventual performance baselines should be developed in such a way as **to encourage maximum participation and guard against international leakage.**

(b) Characteristics, including elements listed in paragraph 1 of appendix I to decision 1/CP.16;
- The REL/RLs represent a benchmark to measure net anthropogenic emission reductions, and should be **based on historical emissions data adjusted for national circumstances**.
- Major sources and sinks should be included in the REL/RL. We note that some countries may need to address this in stages, perhaps beginning with default data.
- High quality data[1] are essential to ensuring that REL/RLs reflect reality and encourage reductions.

(c) Guidance for the construction;
REL/RLs
- As noted above, the best starting point for creating REL/RLs is the use of historical data. Adjustments could then be made for national circumstances if justified. Deforestation is highly complex - drivers vary significantly by region and are subject to a range of unpredictable variables. Degradation is even more complex. Therefore it is extremely difficult to accurately predict long-term future deforestation and degradation rates.
- An **appropriate time period** for estimating historical emissions would need to be established.
- We note the value of **taking relevant guidelines from the IPCC** into account concerning inclusion of GHG emissions by sources and removals by sinks, and the inclusion of all key sources.
- REL/RLs should represent net emissions/removals associated with forests at an IPCC land use category level, applying the IPCC guidance on consistent representation of lands. This type of land-based accounting is a robust and efficient approach to constructing REL/RLs.
- REL/RLs should be constructed in a manner that is **transparent and replicable**.
- The methodology, data and assumptions used for REL/RL construction, particularly if adjustments have been made for national circumstances, should be made publicly available, so that these results can be reviewed and independently replicated.
- For market-based financing in particular, a **minimum level of data quality** will need to be developed for REL/RLs. This could be organized according to: 1) data on changes in forest area, and 2) data to estimate changes in forest carbon stocks.
- A country might start with **subnational REL/RLs** for those sub-national areas with high capacity and high-quality data, scaling up eventually to a national REL/RL. Additional guidance should be considered for subnational REL/RLs.
- Guidelines on REL/RL construction should combine environmental effectiveness with procedural efficiency and establish a clear and straightforward process.

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[1] We recognize that data quality may differ for the varying scopes (perhaps good for RED but not for degradation, for example). Data quality may also vary among provinces/states.

- REL/RLs Levels should be **updated at regular intervals**, based on clear guidance. These updates might take into account improvements in data availability, national circumstances, or broad trends that impact the analysis of the "business as usual" context.
- "Incentives baselines" should also be updated at regular intervals, guided by a long-term goal that identifies an emissions/removals pathway and results in a sustainable level of standing carbon stock within a reasonable time period.

(d) Process for communication;
- Communication on REL/RLs should be consistent with the guidelines to be developed under the Convention, including transparent reporting in biennial update reports and national communications every 4 years, which would be subject to international consultations and analysis.

(e) Other relevant issues.
- It would be useful to provide official guidance on the differences in the respective definitions of "national forest reference emission level" and "national forest reference level," found in para. 71(b) of FCCC/CP/2010/7/Add.1, as there has been confusion on this point in a number of fora.

3. Guidance on modalities for measuring, reporting and verifying, as referred to in Appendix II to decision 1/CP.16:

(a) Characteristics, including elements listed in paragraph 1 of appendix I to decision 1/CP.16
- Because REDD+ is a sectoral mitigation approach, guidelines for measuring, reporting and verifying (MRV) should be part of, and **consistent with, the larger MRV framework as developed by the AWG-LCA**. As for actions taken in other sectors, this would include both a national system in place to monitor, report on and verify emissions from REDD+-related activities, and to the extent that such activities receive international support, international MRV of supported actions This MRV system, as applied to REDD+, should **account for leakage** within the country, should a displacement of activities cause emissions from deforestation or forest carbon stock loss in another part of the country, or cause emissions in another land cover such as grasslands or wetlands.
- It should also **measure and report on reversals**. Reversals in stocks need to be tracked over time, whether they are temporary or permanent.[2]

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[2] For example, sustainable forest management activities may result in short term emissions that are later recaptured in tree growth. Other times, a regrowing forest may be claimed as enhanced stock, but if it is burned in a fire, the stored carbon is released and can no longer be counted as net emissions reductions. An MRV system needs to accurately measure these dynamic stock changes.

- Countries should **measure and report on all significant emissions and removals from forest-related categories and relevant pools**, for example including organic soils such as peat, where significant.
- Consistent with the larger MRV system, a MRV system as applied to REDD+, should be adequately robust/comprehensive to detect the carbon stock changes from conversion of high carbon natural forests to plantations. (We note that the safeguards included in Appendix 1 of Decision 1 of COP16 "ensur[es] that the actions referred to in paragraph 70 of this decision are not used for the conversion of natural forests".)
- As noted earlier, we recommend that a MRV system should be based on **land-based accounting with consistent representation of lands**.

(b) Elements;
- MRV of national-level emissions reductions **should be based on a national greenhouse gas (GHG) inventory.** The national GHG inventory is ideal for this purpose because it is based on IPCC methods, it is comprehensive in terms of emissions sources and sinks, and it is built on consistent representation of lands. This means it should account for leakage of emissions within a country, either to other forested areas, or to other land uses. As a result it will have a higher level of environmental integrity than other approaches
- Beyond the national greenhouse gas inventory, additional MRV might be required at the smaller scale, particularly when REDD+ projects and/or sub-national activities are nested within that national framework, which may be the case for some countries.
- All net emissions reductions claimed under REDD+ should be subject to international **consultations and analysis** as provided for in Paragraphs 62, 63, and 64 of decision 1/CP.16
- Consistent with paragraph 61 of decision 1.CP/16, emission reductions under REDD+ that are internationally supported would also be subject to **international MRV** according to guidelines to be developed under the UNFCCC.
- There are at least two features of REDD+ reporting that may require additional development in a REDD+-specific context: reporting on safeguards, and reporting on methodologies and assumptions related to RELs/RLs. Reporting on these issues should still be consistent with the overall MRV framework.

(c) Process for reporting;
- Any REDD+ reporting processes should be **consistent** with the overall international MRV and ICA framework, including **transparent reporting** in biennial update reports and national communications every 4 years, as well as **international consultations and analysis** of those reports.
- In addition, consistent with paragraph 61 of decision 1.CP/16, emission reductions under REDD+ that are internationally supported shall be subject to both **domestic** MRV, and **international** MRV according to guidelines to be developed under the Convention.

(d) Other relevant issues.

- Developing and implementing methodologies to measure degradation and related emissions will need additional attention, as this is especially complex.
- We note the other aspects of REDD+ -- conservation of forest carbon stocks, sustainable forest management, and enhancement of forest carbon stocks, will also need to be addressed under MRV systems where appropriate.

4. Guidance on modalities for a robust national forest monitoring system, as referred to in Appendix II to decision 1/CP.16:

(a) Characteristics of national forest monitoring systems

- Systems should conform to already-agreed standards and characteristics as agreed in decision 4/CP.15.
- Systems should be based on a **consistent approach to analyzing and detecting land-cover change**. We recommend a consistent national-level approach, based on a combination of spatial analysis and field sampling. We recognize that a staged approach may be necessary to achieve this end.
- **Lands may be sub-classified within the IPCC categories** in accordance with IPCC guidance. This would allow a more explicit tracking of conversion from high-carbon stock forests to lower carbon –stock plantations or other forest types.
- Standardized carbon stock monitoring should be carried out based on **statistically representative sampling,** based on IPCC guidance.
- National forest monitoring systems should be linked to and supporting national MRV systems.
- For eventual market-based approaches, **higher tier/ certainty estimates** may be required.

(b) Elements of national forest monitoring systems

- Long-term monitoring systems should include **both remote sensing** and **field measurements**, ideally based on national forest inventories[3]. Remote sensing provides information on forest area and changes in forest area. Ground plots provide information on forest dynamics, are needed at intensive sites for standardized estimates of carbon stocks and validation, and are also a key component of estimating forest degradation.

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[3] The "best" approach to use for developing a forest monitoring and inventory system depends on individual country circumstances and reporting and accounting requirements. The credibility of the system will come from the appropriateness of its design and implementation, good data, transparency and Quality Assurance/Quality Control procedures. Good data management and long-term institutional commitment by the host country are essential for maintaining the quality of the monitoring system. While a national forest inventory is costly, it offers many benefits beyond the monitoring of carbon.

- Neither remote sensing nor *in situ* measurements alone can provide all of the necessary information. However, when properly integrated, they can provide the geospatial and statistical basis for understanding carbon distribution and flux on the landscape
- **Modeling and analysis** are necessary for estimating and reporting carbon stocks for both biomass, dead wood, litter and soils, based on the data provided by the remote sensing and ground plots.
- **Measurements of carbon** and the development of algorithms are needed to estimate the carbon content of different forest types, biomass, and other land classifications. This data informs the national GHG inventory and provides the basis for more clearly estimating carbon emissions reductions. National forest inventories, even existing ones, should incorporate this information.
- Estimates of forest carbon should also include some **measure of the uncertainties** associated with those estimates.
- Reducing emissions effectively may also benefit from the ability to regularly observe areas under higher threat through **real-time tracking** of emissions "hot-spots," to take note of on-going activities including unplanned deforestation and degradation. This targeted observation will allow land and forest managers to respond quickly to threats as they occur. Such targeted monitoring data can also potentially be used to improve the certainty of the overall inventory estimates.
- Sufficient technical and institutional capacity with regards to national forest inventories, both at the subnational and national levels, is key.

5. Identify land use, land-use change and forestry activities in developing countries, in particular those that are linked to the drivers of deforestation and forest degradation, to identify the associated methodological issues to estimate emissions and removals resulting from these activities, and to assess their potential contribution to the mitigation of climate change.

- The United States recognizes the importance of understanding more fully the drivers of deforestation and forest degradation, including agriculture, and enhancing emissions removals by forests. We recognize that reducing emissions from forests is inextricably linked to other land uses that increase or reduce pressures on forests. These land uses themselves also contribute to GHG emissions and removals. Additional work is needed to more fully analyze land use, in particular drivers of deforestation and forest degradation, and the policies and approaches to address them.
- As such, we recommend a workplan for the coming year that includes studies or expert workshops focused on the following topics:
    - Key drivers of deforestation and degradation, and potential solutions;
    - Potential contributions of improved land use to climate change mitigation;
    - Applying IPCC guidance to address methodological challenges, including leakage and permanence, to estimate emissions and removals resulting from these activities.