To the FCCC/SBSTA

From: WRM – World Rainforest Movement

Ref: Submission about implications of reforestation of lands with forests in exhaustion as afforestation and reforestation clean development mechanism project activities

26 March, 2011

Dear Sir/Madam,

Hereby we would like to submit our comments about the issue of ‘forests in exhaustion’, for which you opened until 28 March 2011 a period of consultation.

The World Rainforest Movement is an organization that, at a global level, defends forest and forest-dependent people in their struggles to secure their livelihoods against threats such as industrial monoculture tree plantations, dams, mining, roads and other similar projects. WRM has carried out many studies on the issue of the impacts of industrial tree monocultures in a close relationship with the directly affected communities. Attached to this document, you can find a series of references to these studies (See Annex below)

We are extremely concerned about the Board’s definition of ‘forests in exhaustion’ and what would supposedly happen to these ‘forests’, according to Annex 1 of the document FCCC/KP/CMP/2009/16, as well as about the proposal to include as a possible CDM activity reforestation activities on lands that did not contain or contained ‘forests in exhaustion’ on 31 December 1989.

Hereby follow our main points of concern:

1. According to your description of ‘forests in exhaustion’ these supposed ‘forests’ can include industrial tree monocultures. In our supportive work to local communities that are affected by these monocultures, we learned that these tree monocultures have nothing to do with forests. The only similarity is that both contain trees. However, while forests offer a huge range of nutritional, water, medicine, spiritual and other benefits to forest peoples, industrial tree plantations are being called “green deserts” by local communities for the fact they do not offer any benefit, and life is totally absent inside the identical rows of trees of these monocultures which have only one purpose: supplying wood to industry. The fact that even
the FAO still considers industrial tree plantations as forests, has had dramatic consequences for thousands of communities in the South and has favored Industry interests. However, over the past years, many academics, state officials, representatives of different social and environmental organizations, etc. have opposed against the FAO definition. The fact that UNFCCC opts for maintaining the FAO definition is disturbing and tends to perpetuate and create new conflicts all over the world between expanding plantation companies and local communities.

2. This new proposal allows tree plantation companies to present a CDM project for any of their plantations, be these existing or new plantations. What we have learned from the practice is that the companies that started their plantations long before 1989 always have counted with sufficient financial support and resources to maintain their activities until now and the main proof is that the major companies always have been replanting their areas. Especially in the global South where this activity is extremely profitable, which has led to a process that Northern tree plantation companies are in a process of transferring their activities to the Global South where they can make more profits. It is therefore that this activity can not be considered as ‘additional’, on the contrary, it is clear that what the industry is aiming at is another subsidy for an already very profitable sector.

3. Industrial tree monocultures of eucalyptus, pine, oil palm and rubber trees cause many negative impacts, in spite of a discourse of industry that it is a ‘sustainable and renewable’ sector. The attached studies show very clearly that these plantations have severe impacts on the land distribution, expelling people directly and indirectly from their land. Large scale plantations have huge impacts on water resources availability and quality and several scientific studies on the issue are also publicly available. Plantation companies need to apply pesticides that affect soil, biodiversity and the workers. This type of agricultural activity creates 10 to 15 times fewer jobs if compared with small-scale agricultural production and the majority of jobs are dangerous and relatively badly paid. Women are relatively most impacted by industrial tree monocultures. And also, the expansion of these monocultures continues to be one of the important direct and indirect drivers of deforestation, which means in fact the emission of even more carbon to the atmosphere.

4. And finally, but of extreme importance: be it plantations or be it forests, not one of these tree areas are able to guarantee a structural and long-lasting contribution to mitigate global warming, because, among other reasons, the carbon emissions resulting from deforestation may be chemically identical to those coming from the burning of fossil fuels, but the two are climatologically different. Carbon released from deforestation does not increase the total amount of carbon being exchanged among the atmosphere, the oceans, soils, forests, and so on. Carbon released from fossil fuels, on the other hand, does increase this above-ground carbon pool

Yours sincerely,

Winfridus Overbeek
International Coordinator of the World Rainforest Movement
Annex

**World Rainforest Movement publications on Monoculture tree plantations**

WRM has been researching on the issue of impact of monoculture tree plantations since 1996 when it published “Pulping the South: industrial tree plantations and the world paper economy”. Ricardo Carrere & Larry Lohmann. 1996. Also in Spanish

[http://www.wrm.org.uy/plantations/material/pulping.html](http://www.wrm.org.uy/plantations/material/pulping.html)

In 1999 WRM publishes:

- “Tree Plantations: Impacts and Struggles” a selection of articles published in the World Rainforest Movement's (WRM) Bulletin. Also in Spanish

[http://www.wrm.org.uy/plantations/material/impacts.html](http://www.wrm.org.uy/plantations/material/impacts.html)

- A summary of the book “Pulping the South” was published: “Pulpwood Plantations: a growing problem. Available also in Spanish


- “Ten replies to ten lies” A reply to the ten most common misleading statements being disseminated about large-scale monoculture tree plantations: Available also in Spanish, French and Portuguese

[http://www.wrm.org.uy/plantations/material/lies.html](http://www.wrm.org.uy/plantations/material/lies.html)

In 2000, “The carbon shop: planting new problems” by Larry Lohmann. A thorough study of the false assumption that a specified fragment of wooded land can “offset” a specified amount of industrial carbon-dioxide emissions. Demostration on how large-scale “offset” plantations, instead of mitigating global warming, could even make it worse. Available also in Spanish, French and Portuguese


[http://www.wrm.org.uy/countries/Asia/meekong.html](http://www.wrm.org.uy/countries/Asia/meekong.html)

In 2003:

- “Plantations are not forests”. The second selection of articles published in the monthly electronic bulletin of the World Rainforest Movement, addressing the issue of the impacts of large scale monoculture tree plantations. Also available in Portuguese and Spanish

[http://www.wrm.org.uy/plantations/material/plantations.html](http://www.wrm.org.uy/plantations/material/plantations.html)
In 2005:

- “Certifying the Uncertifiable. FSC Certification of Tree Plantations in Thailand and Brazil” A contribution to the debate over the certification of large-scale tree monocultures. Also available in Portuguese and Spanish

http://www.wrm.org.uy/actors/FSC/uncertifiable.html

- “Pulp Mills: From monocultures to Industrial Pollution” Third selection of stories of environmental degradation and social dispossession related to pulp and paper production. Also available in Spanish and Portuguese


- “Carbon Sink Plantations in the Ecuadorian Andes”. Impacts of the Dutch FACE-PROFAFOR monoculture tree plantations' project on indigenous and peasant communities. Also available in Spanish

http://www.wrm.org.uy/countries/Ecuador/face.html

- “Promises of Jobs and Destruction of Work. The case of Aracruz Celulose in Brazil” By: Alacir De'Nadai, Winfridus Overbeek, Luiz Alberto Soares. Also available in Spanish and Portuguese

http://www.wrm.org.uy/countries/Brazil/fase.html

- “Women, forests and plantations. The gender Dimension” Selection of articles published in the monthly electronic bulletin of the World Rainforest Movement, addressing the gender dimension of the impacts in the forests of plantations. Also available in French and Spanish

http://www.wrm.org.uy/subjects/women/text.html

- “The Economic and Social Context of Monoculture Tree Plantations in Chile: the Case of the Commune of Lumaco, Araucania region” By means of testimonials, documents and figures, the report sets out the problems faced by that commune of 11,405 inhabitants, where monoculture tree plantations have expanded violently, imposed by a forestry development model instituted during the military dictatorship and still currently in force.- Also available in Spanish

http://www.wrm.org.uy/countries/Chile/BookLumaco.html

- “A Study of the Social and Economic Impacts of Industrial Tree Plantations in the KwaZulu-Natal Province of South Africa” By John Blessing Karumbidza


In 2006:


- “The death of the Forest: A Report on Wuzhishan's and Green Rich's Plantation activities in Cambodia” Proponents of industrial tree plantations argue that the plantations are “reforestation”, increasing the area of forest, providing jobs for local people, or reducing pressure on natural forests. This report examines these companies’ operations in Cambodia, the impacts observed to date on the local populations and the environment, and the associated human rights violations.

http://www.wrm.org.uy/countries/Cambodia/BookCambodia.html

- “Greenwash: Critical analysis of FSC certification of industrial tree monocultures in Uruguay” by Ricardo Carrere. This report provides documented information and analysis to all those who are currently struggling against large-scale monoculture tree plantations and must face the additional problem posed by the fact that these same plantations are being certified by the FSC. Also available in Spanish


- “Monoculture tree plantations in Ecuador” By Patricia Granda
Through three case studies and an overview of the history of plantation activity in the country, this publication seeks to present a comprehensive and up-to-date picture of the serious threat posed by tree plantations in Ecuador, of which most of the population has been largely unaware until now. Also available in Spanish.


- Social conflict and environmental disaster: A report on Asia Pulp and Paper’s operations in Sumatra, Indonesia. By Rivani Noor and Rully Syumanda


-“A funny place to store carbon”: UWA-FACE Foundation’s tree planting project in Mount Elgon National Park, Uganda. By Chris Lang and Timothy Byakola


In 2007, Swaziland: The myth of sustainable timber plantations. By Wally Menne and Ricardo Carrere. Although Swaziland is not a very well known country, many foresters not only know about its existence but are even able to use it as an example of “sustainable plantation forestry”. The person responsible for this is Professor Julian Evans – an English forester – who has for years been promoting the view that the Sappi Usutu Pulp Company’s pine plantations in that country are “sustainable”. This research demonstrates that the impacts of plantations in Swaziland were as negative as elsewhere.


In 2008:

- “Women and Eucalyptus Stories of Life and Resistance” Impacts of Eucalyptus Monocultures on Indigenous and AfroBrazilian Women in the State of Espirito Santo. Brasil, By Gilsa Barcellos and Simone Ferreira. Also available in Portuguese and Spanish.

http://www.wrm.org.uy/countries/Brazil/Book_Women.html

- “FSC certification of tree plantations needs to be stopped”. Plantations are monocultures, created from seemingly endless rows of identical trees. They suck the water out of nearby streams and ponds
and lower the water table, leaving little or no water for people living near the plantations. They deplete soils, pollute the environment with agrotoxics and eradicate biodiverse local ecosystems. But what's almost as bad as the plantations themselves is that this sort of plantation is given a green seal of approval by the Forest Stewardship Council. Also available in Spanish and Portuguese.

http://www.wrm.org.uy/actors/FSC/WRM_Briefing.pdf

- “Plantations, poverty and power: Europe’s role in the expansion of the pulp industry in the South”, By Chris Lang

- Working conditions and health impacts of industrial tree monocultures
Also available in Spanish

- “Tree plantations in the Mekong region” Eucalyptus, oil palm, rubber and jatropha monoculture plantations are expanding onto local communities’ lands and forests in the Mekong region’s countries. This research shows how although promoted under the guise of development, poverty alleviation and even climate change mitigation, such plantations are resulting in severe social and environmental impacts. Also available in Cambodian, Thai and Lao

- Timber Plantations in Southern Africa. An Overview of the opposition to large scale timber plantations (mainly in South Africa, Zimbabwe, Swaziland and Mozambique).

In 2010, “The Expansion of Tree Monocultures in Mozambique. Impacts on local peasants communities in the Province of Niassa” by Winfridus Overbeek Also available in Portuguese.

WRM has also published many other articles showing the different impacts of monoculture tree plantations in many parts of the world.
They are all available at:
http://www.wrm.org.uy/plantations/index.html