

RE: Roadmap to halt and reverse deforestation and degradation

April 10, 2026

Dear Mr. André Corrêa do Lago,

Thank you for the opportunity to share views on the development of a **Roadmap to halt and reverse deforestation and degradation by 2030**.

An ambitious, comprehensive roadmap offers the opportunity to correct longstanding gaps and limitations of international forest policies and to address the structural barriers that have so far hindered national progress on forest and climate goals. Despite widespread pledges and initiatives to protect forests and land, progress has been limited, and the international community remains off track to meet its targets. To date, international efforts to protect forests have relied on piecemeal, voluntary approaches that fail to confront the systemic challenges, norms, and political-economic realities countries face. This roadmap must avoid the pitfalls of policy recommendations that leave the structural dynamics of deforestation and forest degradation in place. To succeed in its ambition, the roadmap will need to confront and address these myriad challenges head on.

To halt deforestation by 2030, **three pillars of reform must be considered**. **First**, the roadmap must address the “hidden crisis” of deforestation and forest degradation. Current definitions and accounting rules are obscuring the massive scale of ongoing forest loss, threatening the ecosystem integrity on which climate stability and resilience depend, while increasing risks of greenhouse gas emissions and susceptibility to climate-induced shocks and disturbances. **Second**, the roadmap must enable scaled-up ambition in securing fair and sustainable land use, including effective and equitable forest governance and increased recognition of the customary land and territorial rights of Indigenous Peoples, Afro-Descendent Peoples, and local communities who are at the forefront of forest protection efforts globally. **Third**, the roadmap must provide a robust political path to addressing the constraints imposed by the rules and institutions of global economic governance on national efforts to achieve international forest goals. **The current global economic architecture critically undermines the policy and fiscal autonomy of developing countries**, hindering their ability to sustainably manage their lands and resources. An effective roadmap must address these three pillars with a robust, time-bound action plan. This will require whole of government approaches to ensure coordination across relevant Ministries, and the roadmap must provide guidance on how to ensure this level of collaboration.

1. The role of forests in meeting mitigation and adaptation goals

A forest roadmap must deliver concrete action to help achieve the goal of halting and reversing deforestation and forest degradation by 2030. Degradation is a “hidden crisis” in addressing forest loss, with the area of degraded forest expanding at twice the rate of deforestation

annually.¹ Due to inconsistencies in definitions and monitoring between countries, degradation often goes unreported, all while contributing to greenhouse gas emissions and biodiversity loss and reducing the capacity of forests to retain carbon and adapt to climate change. An effective roadmap must address these longstanding deficiencies by developing equitable approaches across all forested countries to transparency, monitoring and reporting, as well as developing common definitions for comparable tracking of progress between countries.

Industrial logging in boreal and temperate regions is a major driver of forest degradation – reducing the average carbon stock in forests by 50%.² Gross emissions from logging are significant but hidden from most decision makers by carbon accounting rules that each year net out the emissions from the relatively small areas logged against sequestration in the much larger area of re-growing forests.³ Decision makers overlook emissions from wood production forests until they become net sources, masking significant carbon losses and reinforcing the false perception that logging is carbon neutral.

Transparency is limited outside the tropics because rigorous reporting frameworks are mostly tied to results-based finance in tropical forested countries. FAO reporting also varies widely, especially in how countries distinguish deforestation from degradation, with the largest inconsistencies in major logging nations, where forest degradation often goes unreported. For the 2025 FAO Forest Resource Assessment, only 59 countries reported that they monitor forest degradation, with almost three-quarters of these being tropical forest countries. Notably, the same FAO report acknowledges the superior climate and biodiversity benefits of primary forests and notes with concern their increasing loss – losses that are not recoverable in relevant time frames nor revealed in national carbon accounts and occur in both developed and developing countries. Greater accountability is required.⁴

Forest definitions vary between different international conventions and between countries. This leads to incomplete monitoring of forest loss and degradation, and an inability to track ecological integrity, which is key to the resilience of forests in the face of the climate and biodiversity crises. Current forest definitions vary across countries and often obscure significant ecological loss. Deforestation is counted only as permanent conversion to other land uses, meaning temporary tree cover loss from industrial logging can still be classified as forest despite major carbon and biodiversity impacts. Forest degradation—long-term declines in ecosystem integrity from management, disturbances, and climate extremes—is harder to define and monitor, and with no consistent standards, many forms go undetected and unreported in decision-making. Sustainable Forest Management (SFM) is a term that describes the economic sustainability of timber harvests, but does not account for the declining ecological integrity of harvested forests.

¹ Global Forest Watch. “Global dashboards” Available at: <https://www.globalforestwatch.org/dashboards/global>

² Heather Keith, et. al. “Re-evaluation of forest biomass carbon stocks and lessons from the world’s most carbon-dense forests,” 2009. PNAS. Available at: <https://doi.org/10.1073/pnas.0901970106>

³ Brendan Mackey, et. al. “Net carbon accounting and reporting are a barrier to understanding the mitigation value of forest protection in developed countries” 2022. *Environmental Research* Available at: <https://doi.org/10.1088/1748-9326/ac661b>

⁴ The Land Gap Report and Natural Resources Defense Council. “Harmonized Standards and Accountability: Key Outcomes of the Forests and Climate Roadmap” February 2026. Available at: <https://landgap.org/downloads/2025/Forests%20and%20Climate%20Roadmap.pdf>.

There have been longstanding calls from the global forest community for “shared accountability that fosters comprehensive, common, and equitable action to protect and restore forests globally.”⁵ A recent IUCN motion reinforces the need to deliver equitable accountability and means of implementation for international forest protection goals.⁶ Another urges greater protection of the world’s primary forests and making primary forest protection a priority in international policies.⁷ Currently, the countries with the highest rates of forest degradation, such as Canada, Australia and the US, do not report this as degradation or the gross emissions it causes, while tropical forest countries are held to higher standards of monitoring and reporting on all types of forest loss. A Forests and Climate Roadmap must address this inequity and transparency of gross emissions from logging and the potential to recover lost carbon stocks in developed countries.

Recommended Elements of the Forest Roadmap:

- Build on the IUCN motion for a Forest Accountability Framework and the protection of primary forests to provide a forum for discussion of harmonisation of global definitions around forests and monitoring approaches.
- Integrate data from the Forest Declaration Assessment process into an appropriate multi-lateral forum to provide consistency and transparency for monitoring towards goals to halt and reverse deforestation and forest degradation by 2030
- Align forest protection and restoration goals with the Kunming-Montreal Global Biodiversity Framework targets, notably, retaining all areas of high ecological integrity and restoring ecological integrity and connectivity of forest ecosystems.
- Develop forest management principles that prioritise ecosystem integrity by recognising biodiversity as fundamental to maintaining long-term carbon storage and climate resilience, and by avoiding practices – such as large-scale biomass harvesting, including thinnings and residues, for bioenergy – that degrade forests, reduce biodiversity, and weaken carbon stocks and sinks.

2. The role of States and non-state actors in ensuring fair and sustainable land use

It is well accepted that secure land tenure and stronger forest and land use governance are essential to securing the broader goals of halting and reversing forest loss and degradation. As supported by a growing body of evidence, Indigenous Peoples, local communities, and Afro-descendent Peoples with secure land rights incur lower rates of deforestation than publicly or privately managed areas, in addition to generating more equitable and sustainable outcomes for both people and biodiversity.⁸ Armed with the recognition that forest communities play a vital role in global efforts to halt and reverse forest and biodiversity loss and in strengthening the

⁵ Natural Resources Defense Council. “Letter from more than 100 civil society organizations calling on countries to establish a Glasgow Declaration Accountability Framework (GDAF)” November 2023. Available at: <https://www.nrdc.org/sites/default/files/2023-11/gdaf-coalition-letter-final-signed-20231130.pdf>

⁶ IUCN World Conservation Congress. “Motion 011: Delivering harmonised accountability and means of implementation for international forest protection goals” 2025. Available at: <https://iucncongress2025.org/assembly/motions/motion/011>

⁷ IUCN World Conservation Congress “Motion 015: Primary and old-growth forests at the next World Conservation Congress” 2025. Available at: <https://iucncongress2025.org/assembly/motions/motion/015>

⁸ Land Gap (2025) The Land Gap Report 2025, University of Melbourne. Available at: <https://www.landgap.org/>

climate resilience of these critical ecosystems, 10 of the world's most important tropical forest countries signed the International Land Tenure Commitment (ILTC) at COP30 in Belém, to secure or strengthen community rights over at least 160 million hectares by 2030.⁹

At present, Indigenous Peoples, local communities, and Afro-descendent Peoples hold legally recognized rights to at least 623 million hectares (roughly 17%) of the world's forests,¹⁰ but they customarily manage more than half of the world's forests. So whilst the ILTC and the pledge to provide \$1.8 billion to support its implementation¹¹ constitute important steps in the right direction, deeper and more cross-cutting changes will be needed to ensure community contributions are rendered real and effective.

Further, while states have a duty to fulfill their human rights obligation and demonstrate progress towards international climate and biodiversity commitments, the roadmap cannot solely depend on Parties to initiate action and compel equitable and sustainable land and resource use. Non-state actors, including the private sector, civil society, Indigenous Peoples and other traditional communities all have a critical role to play in bringing about urgently needed transformations. Hence, the success of the roadmap resides less in developing a fail-proof plan than it does in creating the spaces and processes that can support collective action, strengthen accountability, and maintain joint momentum towards shared goals and priorities.

At present, however, land governance is not a formal item of the UNFCCC COP agenda, hindering the extent to which Parties can advance land policies that would enhance their climate interventions and jointly tackle the factors that drive sovereign debt and their impacts on lands, forests and resources. In the absence of a global policy reference point or framework to guide both Parties and non-state actors on land governance issues and ensure their effective integration and recognition in NDC processes, efforts to change the status quo are unlikely to yield their desired impact.

However, substantive guidance on how non-state actors can strengthen rights-based land governance and support Indigenous and Afro-descendent Peoples and local communities already exists.¹² Together with existing international human rights obligations of states and corporations, and Parties' commitments to sustainability, equity and the eradication of poverty and all forms of discrimination, the roadmap has a solid foundation to build on. It now needs to articulate how it will scale up collective action and accountability in the context of growing geopolitical tensions, rising demand for land and resources, and diminishing state support for social and environmental progress. Parties cannot overcome these challenges alone. To be effective, non-state actors and in particular Indigenous Peoples, local communities and Afro-descendent Peoples who play an outsized role in the sustainable use and governance of

⁹ FCLP. "COP30 Intergovernmental Land Tenure Commitment in tropical forest countries" November 2025. Available at: <https://www.tenurepledge.org/>

¹⁰ Rights and Resources Initiative (Forthcoming) Who owns the world's forest: The state of community-based tenure rights across 61 countries

¹¹ FCLP. "COP30 Intergovernmental Land Tenure Commitment in tropical forest countries" November 2025. Available at: <https://www.tenurepledge.org/>

¹² Land Rights Standard. "The 10 Principles." nd. Available at: <https://www.landrightsstandard.org/>

the world's biodiversity and forested areas need to have a seat at the table and made part of the decisions that will inform the design and implementation of the roadmap.

Recommended Elements of the Forest Roadmap:

- Strengthen processes and resources to realize rights of Indigenous Peoples, local communities, and Afro-descendent Peoples, including recognition of land rights. Securing their collective land and resource rights is fundamental to their sustainable stewardship, livelihoods, and cultural survival, and a necessary condition to addressing the world's climate, biodiversity, and development challenges.
- Ensure rights-based participation of non-state actors and in particular Indigenous Peoples, local communities and Afro-descendent Peoples in all forest-related protection, restoration, and sustainable use measures or policy decisions. All landscape-level interventions should be planned, implemented and monitored with the full collaboration of affected communities—inclusive of women and youth—taking into account their self-determined priorities and locally defined approaches.
- Respect the free, prior and informed consent (FPIC) of Indigenous Peoples, particularly the women and youth within them, and their right to self-determination. Community rights to free, prior, informed and substantive participation in consultative processes and decisions that may impact their lands and territories, or ability to meet their livelihood needs and/or social and environmental welfare should be fully respected and upheld by all governments.
- Recognize and respect the traditional knowledge systems, science and locally-adapted practices of Indigenous Peoples, local communities, and Afro-descendent Peoples. Built over generations of living in harmony with nature, they offer invaluable insights into climate adaptation, resilience, and sustainability. When integrated alongside other sciences, they provide the best possible pathways for responding to the world's environmental crisis and the needs of the COP Presidency Roadmap.

3. The role of international cooperation to reform global economic governance

Conventional explanations for the failure to halt deforestation and forest degradation tend to focus on a lack of: political will, financial resources, commitment from private sector actors and state capacity to implement decisions. This understanding has continued to shape policy interventions focused on supply chains, governance and finance in the land and forest sector for decades. Forest policymaking must now move beyond market-based and voluntary instruments and instead confront the structural economic barriers that entrench extractive growth, advancing a reparative, rights-based global economy. **The current structure of global economic governance constrains countries' policy and fiscal autonomy to take necessary actions aligned with deforestation goals.** These rules constrain what governments can or cannot do to address both economic development and ecological crises, at times incentivising and sometimes directly mandating ongoing extraction of natural resources.

Facing short-term pressures to pay debts, balance imports, maintain “investability,” and comply with international financial institutions, states often rely on maintaining or even expanding

sectors that cause deforestation and forest degradation. These pressures are built into the global economic system: failing to adhere to these pressures would risk financial instability, stability that affects both people's daily lives and the state's ability to secure vital imports (such as technology and medicine) and maintain public spending. In other words, there are significant conflicts between the short-term, urgent pressures states face to secure financial and economic stability and the equally urgent need to maintain ecological stability. Those rules push many countries, especially in the Global South, into reliance on extractive industries as a means of sustaining financial stability. Yet these industries, such as mining, forestry, large-scale bioenergy, fossil fuels and industrial agriculture, are also the main drivers of ecological destruction. As such, genuine progress toward deforestation goals demands critical and meaningful policy engagement with global economic governance structures that influence the boundaries of national policy action, including sovereign debt management; taxation and domestic resource management; as well as trade and investment policies.

Current dominant approaches to resolving **sovereign debt**, particularly involving the IMF, deepen countries' commodity dependence and weaken their ability to protect marginalized communities and vulnerable ecosystems from the expansion of agricultural and extractive sector pressures. A forest roadmap must address this critical gap. **A better approach to sovereign debt crises must allow governments the fiscal breathing space to regulate commodity sectors and protect traditional communities and the ecosystems that support them.** This means that all creditors – including bondholders, multilateral development banks and sovereign lenders – need to offer meaningful debt relief to low and middle-income countries. The IMF should reduce or eliminate austerity requirements, or at the very least, include protections for the most vulnerable communities and the ecosystems that support them by targeting reductions in deforestation.

In September 2025, the Forest & Climate Leaders' Partnership (FCLP), a coalition of 34 governments, released the [Forest Finance Roadmap for Action](#), a six-point plan to unlock greater investment and accelerate progress toward halting and reversing forest loss by 2030.¹³ **This roadmap recognised that how sovereign debt is managed is a priority policy arena for reform**, noting that “a comprehensive approach to reducing debt can reduce current pressures to generate short-term revenues from forest exploitation” and further highlighted that allocating only 1% of current debt service payments could free up \$4.9 billion USD annually for investment in forest resilience. Moreover, the Forest Finance Roadmap recognised that fiscal policy reform, including taxation and subsidies, could unlock significant resources. This is a welcome development, but there is no meaningful pathway to the implementation of these critical elements of the roadmap. The COP Presidency led roadmap should build on this welcome development.

Further, reform of international **financial transparency and tax cooperation rules** has the potential to recover hundreds of billions of dollars in lost revenue while also combating the

¹³ FCLP. “Forest Finance Roadmap for Action” 2025. <https://forestclimateleaders.org/news-and-resources/34-governments-the-forest-finance-roadmap-for-action/>

opacity and profitability of environmentally harmful activities. Crossborder tax abuse and illicit financial flows undermine forest and biodiversity protection by depriving Global South countries, in particular, of essential revenue. International financial secrecy also shields multinational corporations and economic elites from accountability and facilitates environmental criminality and corruption. The effective democratisation of tax policymaking at both national and international levels is necessary to provide revenue for forest and land rights, and also to reshape the global economy away from the destruction and degradation of the same. The UN Framework Convention on International Tax Cooperation represents a historic opportunity to reorganize the global distribution of taxing rights, to deliver a step-change in financial transparency, democratise tax policymaking, confront abusive tax practices and align fiscal justice with environmental sustainability, ultimately creating an international tax system for sustainable development.

Finally, current trade and investment rules reinforce the political and economic power of global commodity traders in commodity value chains. Relying on voluntary private sector commitments leads to delayed action, broken promises, and further devastation of the world's forests. Instead, a commitment to food sovereignty, the right to food, and the protection of resilient ecosystems should be understood as *a precondition* for economic development; Agricultural trade rules need to build on that foundation, not compete with those objectives.

Recommended Elements of the Forest Roadmap:

1. The roadmap must take steps to address the “vicious cycle” of how sovereign debt management is treated in the current global financial architecture, specifically recommending **reducing or eliminating austerity conditionalities, ensuring equitable debt relief, including** middle-income countries, and incentivize participation across all creditor classes, including bondholders and private creditors.
2. The roadmap must recognize the importance of **comprehensive, equitable and progressive reform of global taxation policy as a tool to support protecting forests**. The Roadmap should give guidance to governments to cooperate in good faith with negotiation of the UN Framework Convention on International Tax Cooperation to deliver an inclusive, democratic, equitable, and transparent system of international tax cooperation for sustainable development that is aligned with environmental and human rights goals and which takes into account the specific needs of and historic injustices faced by countries of the Global South.
3. **The roadmap must explore trade policy tools and reforms to better align food security and forest protection**. A commitment to food sovereignty and the right to food is a precondition for economic development, as is the protection of resilient ecosystems, including forests. Agricultural trade rules need to be built on, rather than compete with, those objectives. Trade rules must also address restrictive business practices that dominate agricultural markets. A radically different approach to food security, premised on decentralised, diverse and locally controlled food systems instead of imported grains, while tightening standards on commodity exports and rebalancing the distribution of costs and gains from commodity trade, would also help to reset climate and forest

politics. Such an approach would distinguish food sovereignty from the activities of the firms involved in global commodity chains.

4. Finally, the roadmap must commit to **phasing out subsidies and tax incentives leading to forest loss and degradation**. Industrial agriculture and logging practices continue to receive billions of dollars in public monies to subsidize their destructive practices. For example, funding schemes in Europe that promote intensive forestry and biomass combustion for “renewable” energy under the RED and some productive or intensive forestry models under the CAP and State aid rules should be reformed to eliminate financial support for monoculture plantations, salvage logging with deadwood removal, and large volumes of biomass extraction for energy. Reorienting subsidies with the objective of supporting food sovereignty and biodiversity-positive and climate-resilient forest management practices is also needed.

Thank you for the opportunity to share views on how a forest roadmap can enhance ambition and deliver meaningful progress on longstanding and critically important goals. Overcoming the systematic failure of past efforts to achieve the goals of halting deforestation and degradation¹⁴ requires nothing short of a blue-print for transformational change.¹⁵ Ending deforestation and realizing rights requires whole-of-society approaches that can tackle these underlying causes and compel progress towards a more just and sustainable future. We would be happy to support the development and drafting of the roadmap with more detailed research and analysis on any of the above points.

Sincerely,

1. Action Aid USA
2. Alternatives, Cameroon
3. Bank Information Center
4. Bretton Wood Project
5. Center for Economic and Law Studies (Celios), Indonesia
6. Center for Environment and Development, Cameroon
7. Climate and Community Institute
8. The Common Initiative
9. Dejusticia - Centro de Estudios de Derecho, Justicia y Sociedad, Colombia
10. FASE - Solidarity and Education, Brazil
11. Fern
12. Forest Peoples Programme
13. Friends of the Earth US
14. Global Institute for Sustainable Prosperity
15. Greenpeace International

¹⁴ Forest Declaration Assessment. “Forest Declaration Assessment 2025: Tracking progress toward halting and reversing deforestation by 2030” 2025. Available at: <https://forestdeclaration.org/>

¹⁵ IPBES. “Summary for Policymakers of the Thematic Assessment Report on the Underlying Causes of Biodiversity Loss and the Determinants of Transformative Change and Options for Achieving the 2050 Vision for Biodiversity of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services.” 2024. Available at: <https://www.sei.org/wp-content/uploads/2024/12/transformative-change-assessment-report-spm.pdf>

16. Inesc - Instituto de Estudos Socioeconômicos, Inesc
17. Institute for Agriculture and Trade Policy
18. Latindadd
19. MADANI Berkelanjutan, Indonesia
20. Philippine Movement for Climate Justice (PMCJ)
21. Power Shift Africa
22. Rainforest Action Network
23. Rainforest Foundation Norway
24. Rainforest Foundation UK
25. Recourse
26. Rights and Resources Initiative
27. Sahabat Alam Malaysia (Friends of the Earth, Malaysia)
28. Tax Justice Network
29. Tebtebba
30. The Common Initiative
31. Third World Network