

COP30 President  
Secretariat of the UNFCCC

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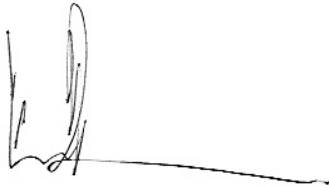
Dear COP30 President,

**Subject: The COP 30 Presidency Roadmap on Halting and Reversing Deforestation and Forest Degradation by 2030**

The **Business Council for Sustainable Development Australia** (BCSDA) is the Australian network partner of the **World Business Council for Sustainable Development** (WBCSD) and contributes to the WBCSD Member Business Council network, connecting national and regional councils advancing practical sustainability solutions.

BCSDA is also the Australian focal point for the **We Mean Business Coalition** (WMBC), supporting business action consistent with the goals of the Paris Agreement. BCSDA engages with the **Business for Nature coalition** to support business leadership and practical implementation approaches for nature-positive outcomes. In this context, BCSDA's input reflects Australian business perspectives and relevant international practice, with a focus on implementation pathways that reduce risk and enable investment.

Yours faithfully



Andrew Petersen  
CEO | Business Council for *Sustainable Development* Australia

## Executive message

BCSDA welcomes the COP30 Presidency's intention to develop an implementation-focused forests roadmap that identifies actionable measures, gaps, and replicable approaches across diverse contexts.

From an Australian business perspective—closely connected to regional commodity trade, finance, and evolving due diligence expectations—priority needs include: scalable, cost-effective **traceability and MRV**; finance structures that make forest protection/restoration and sustainable value chains **investable at scale**; strengthened enabling environments (governance, enforcement, and trade coherence); and approaches that embed the **rights and knowledge of Indigenous Peoples and local communities (IPLCs)** and reflect diverse national circumstances and forest-cover realities.

The most useful COP30 forests roadmap will be one that translates ambition into implementation by reducing fragmentation, lowering transaction costs, improving accountability, and making credible forest protection and sustainable commodity transitions investable across diverse contexts.

### (a) Most critical barriers

The Presidency invites barriers across **physical, economic, financial, institutional, technological, and social** dimensions.

#### 1) Barrier: persistent drivers and economic incentives that reward conversion

Key drivers vary by context, but commonly include:

- **Agricultural expansion and commodity-driven conversion**, amplified by weak traceability and inconsistent market signals.
- **Illegal logging and associated organized crime**, enabled by enforcement gaps and transnational dynamics.
- **Infrastructure and land-use pressures** where planning, tenure clarity, or safeguards are insufficient to prevent degradation and leakage.

#### 2) Barrier: limited investability at landscape scale

Forest conservation/restoration and sustainable supply-chain transitions often face **high transaction costs**, limited metrics/MRV readiness, and liquidity constraints that restrict scalable investment—particularly for landscape and nature-based solutions (NbS).

#### 3) Barrier: fragmented traceability and data interoperability across supply chains

The practical ability to demonstrate deforestation-free sourcing across multi-tier value chains is constrained by uneven traceability uptake, inconsistent definitions, and non-harmonised data approaches. Business insights repeatedly point to the need for traceability technologies and supplier engagement to verify commodity origin and reduce deforestation risk.

#### 4) Barrier: uneven governance and enforcement capacity with cross-border leakage

Where enforcement capacity is constrained, or where illegal activity is enabled by cross-border dynamics, progress is undermined by continuing deforestation drivers, including **organized crime and transnational environmental crime**, and by trade and institutional misalignment across jurisdictions.

#### 5) Barrier: insufficiently embedded IPLC rights, knowledge, and durable benefit-sharing

Forest outcomes are least durable where IPLC rights, knowledge, and equitable benefit-sharing are not meaningfully embedded in planning, monitoring, and accountability mechanisms. The Roadmap's explicit attention to IPLC rights/knowledge is therefore foundational to implementation design. Where relevant, implementation mechanisms should be co-designed with rights-holders and affected communities, not merely applied to them, including in governance, project selection, monitoring, grievance pathways, and benefit-sharing arrangements.

## (b) Potential levers to accelerate implementation

The Presidency requests **economic, financial, institutional, social, and technological** levers.

### 1) Lever: a “minimum interoperability” package for traceability + MRV

To reduce fragmentation and compliance burden while improving credibility, the Roadmap could promote a practical interoperability package for deforestation-free supply chains, including:

- **Common definitions and parameters** (e.g., deforestation vs. conversion; cut-off dates where relevant; treatment of degradation risk).
- **Core data fields** (e.g., geolocation/plot identifiers where feasible; supplier tiers; chain-of-custody metadata).
- **Evidence hierarchy** (e.g., geolocation + remote sensing; independent audits; grievance/correction processes).
- **Smallholder-ready pathways** that reduce exclusion risk while maintaining integrity.

This reflects current business efforts to scale traceability technologies, supplier engagement, and sustainable sourcing approaches to support credible deforestation-free and conversion-free supply chains.

### 2) Lever: de-risk and scale finance for conservation, restoration, and sustainable value chains

Support blended/catalytic finance structures that address investability barriers—metrics/MRV readiness, transaction costs, and liquidity constraints—and connect investable pipelines to appropriate capital providers.

Practical tools that the Roadmap could highlight include:

- **Standardised term sheets / templates** for landscape and supply-chain interventions.
- **Aggregation facilities** (warehousing/aggregation) to bundle small projects into investable scale.
- **Performance-linked tranches** aligned to MRV milestones (outcomes-based elements where context-appropriate). In practice, cost allocation will need to reflect function: public and philanthropic capital can help fund enabling conditions and early-stage preparation; development finance can support de-risking and aggregation; and private capital can scale proven interventions where risk, tenure, and MRV conditions are sufficiently robust.

### 3) Lever: delivery platforms that coordinate action and match investment supply/demand

Place-based “hub” models can function as delivery infrastructure—mapping opportunities, convening stakeholders, matching investment supply/demand, and connecting collective action projects with context-appropriate funders/investors.

### 4) Lever: strengthen MRV credibility while reducing cost through implementation clusters

Scale cost-effective MRV by standardising methods within defined landscape contexts and establishing **implementation clusters** that can be replicated (reducing duplication and improving comparability across landscapes).

### 5) Lever: trade coherence and aligned due diligence to reduce leakage

To address leakage and uneven incentives, the Roadmap could encourage:

- **Aligned definitions** and, where integrity thresholds are met, mutual recognisability of credible and verifiable evidence across jurisdictions.
- **Interoperable due diligence expectations** to reduce duplicative reporting while maintaining integrity; and
- **Practical cooperation approaches** that target transnational environmental crime and illicit trade flows.

### 6) Lever: scale sustainable forest management (SFM) through practical enabling measures

For production forests and mixed-use landscapes, accelerate SFM by combining:

- access to finance (including de-risked capital for improved practices),
- capability building and technical support, and
- MRV approaches proportionate to forest type and tenure arrangements.

### 7) Lever: enable pre-competitive collaboration and credible transparency

Encourage collaboration to share good practices, align supplier expectations, and support credible communications to investors, consumers, and regulators—improving accountability and reducing free-rider incentives.

## (c) Replicable experiences, best practices, lessons learned

The Roadmap seeks real-world measures that can be replicated across contexts.

### 1) Illustrative example: “hub + commodity forum” model to align demand, action, and finance

An illustrative architecture referenced in WBCSD materials combines:

- a broader convening and co-investment hub (Landscape Accelerator Brazil), and
- a commodity-specific partnership (Soft Commodities Forum) targeting deforestation- and conversion-free soy in the Cerrado.

### 2) Pipeline building + investment matching as a replicable function

The Landscape Accelerator Brazil includes an investment matching and blended finance focus to accelerate investment into key landscapes—showing how platforms can reduce coordination costs and help make pipelines investable.

### 3) MRV implementation clusters as a replication pathway

Standardising MRV approaches through a small number of biome/commodity “implementation clusters” can reduce monitoring costs while improving credibility and comparability, supporting replication across regions over time.

## (d) Reflecting diverse realities (development stages, IPLC rights/knowledge, forest cover)

The Roadmap explicitly asks how action can reflect differing national circumstances, IPLC rights/knowledge, and degrees of forest cover.

BCSDA suggests presenting a **menu of options** by context (rather than a single pathway):

1. **High forest cover / high integrity priority contexts**  
Prioritise enforcement capacity, community partnerships, and performance-linked finance for protection, with governance and monitoring designed to embed IPLC participation and knowledge.
2. **High commodity pressure / high supply-chain leverage contexts**  
Prioritise deforestation-free supply chains via interoperability guidance for traceability/MRV, supplier engagement, and pre-competitive collaboration—linked to catalytic finance to support compliance and practice change.
3. **Restoration opportunity contexts**  
Prioritise restoration and sustainable forest management, backed by blended finance and MRV clusters that build investable pipelines and track outcomes credibly.

**Safeguards (cross-cutting):** Across all contexts, implementation should include safeguards on tenure where relevant, **FPIC-aligned engagement** as applicable, accessible grievance mechanisms, and transparent benefit-sharing arrangements to support durable outcomes and legitimacy. In contexts involving Indigenous Peoples and local communities, these safeguards are likely to be most durable where implementation arrangements are designed with affected rights-holders and communities from the outset, rather than added later as compliance measures.

## Practical recommendations for the Presidency Roadmap

To strengthen usability for governments, business, and financiers, BCSDA recommends the Roadmap include:

1. **Adopt a Traceability/MRV Interoperability Toolkit** with common definitions, core data fields, an evidence hierarchy, smallholder-ready pathways, and grievance/correction processes to accelerate credible deforestation-free supply chains.

2. **Include an implementation-grade finance package** that addresses investability constraints such as transaction costs, MRV readiness, and liquidity, and highlights catalytic/blended finance tools, aggregation facilities, and performance-linked tranching to mobilise capital at scale.
3. **Provide a replication playbook for delivery platforms** setting out governance options, safeguards, and practical steps to establish place-based hubs with investment-matching functions and commodity-specific partnerships where relevant.
4. **Establish a dedicated pathway on enforcement and transnational environmental crime** including practical capacity-building and cross-border cooperation options relevant to illegal activity and trade-linked leakage risks.
5. **Issue trade coherence guidance** that encourages aligned due diligence expectations and, where integrity thresholds are met, mutual recognisability of credible and verifiable evidence across jurisdictions to reduce leakage and duplication while maintaining integrity.

## Closing

BCSDA would welcome continued engagement with the COP30 Presidency team as the forests roadmap is refined into a practical reference that supports implementation, integrity, and replication across diverse national contexts. In BCSDA's view, the Roadmap will be most effective where it helps translate high-level ambition into lower-friction, higher-integrity delivery pathways that governments, business, financiers, Indigenous Peoples, and local communities can use in practice.