indústria brasileira de árvores

São Paulo, April 10, 2026.

To the COP30 Presidency,

In support of the development of the Roadmap to Halt and Reverse Deforestation and Forest Degradation by 2030, Ibá respectfully submits its contribution, grounded in technical evidence and in the consolidated experience of Brazil's plantation forest. This submission aims to provide inputs for the development of solutions that reconcile sustainable production, conservation, and forest restoration, recognizing the strategic role of forests in addressing climate change, generating sustainable development, and promoting a low-carbon economy.

Introductory Note

The development of a global roadmap to halt and reverse deforestation and forest degradation by 2030 requires an approach that aligns climate ambition with concrete instruments capable of effectively and sustainably reducing the economic pressures that drive deforestation.

In many countries of the Southern Hemisphere, deforestation is directly associated with a structural economic imbalance: activities that result in land-use conversion often remain more profitable than forest conservation and restoration. Therefore, without the creation of economic incentives that make standing forests competitive, Comand and Control (C&C) tend to have limited long-term effectiveness.

In this context, well-designed market mechanisms can directly contribute to reducing deforestation by channeling financial flows toward activities that maintain forest cover, promote restoration, and economically value emissions removals and reductions. By creating value for standing forests and sustainable production systems, these instruments help shift the economic logic that drives forest conversion. However, this dynamic is not uniform, and it is essential to consider the structural differences between countries in the Southern Hemisphere and the Northern Hemisphere, as well as their distinct institutional, economic, and technological capacities.

Additionally, it is crucial to recognize the heterogeneity of production systems and national realities. In some contexts, particularly in Brazil, there are production systems integrated with the conservation of native ecosystems, in which industrial activities operate in a complementary manner to conservation. These models contribute to reducing pressure from illegal deforestation by combining production, expansion of conserved areas, carbon stocks, and economic value generation from production forests, representing an approach that should be recognized, strengthened, and, where possible, replicated.

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In this sense, for the roadmap to be effective in reducing illegal deforestation at a global scale, it is essential to recognize and value the strategic role of nature-based solutions, not merely as complementary measures, but as central elements in maintaining forest cover and restoring degraded areas.

In summary, the success of the roadmap will depend on its ability to articulate:

(i) the creation of economic incentives that make conservation and restoration more competitive than land-use conversion;

(ii) the design of regulatory instruments capable of directing investments toward forest maintenance and recovery at scale; and

(iii) the recognition of national specificities and the central role of nature-based solutions in reducing global illegal deforestation.

(a) What are the most critical barriers — whether physical, economic, financial, institutional, technological or social — preventing the halting and reversing of deforestation and forest degradation?

From a regulatory standpoint, combating illegal deforestation is directly associated with Land grabbing and reducing recurrent illegal land-use practices, such as illegal occupation of public lands, land title fraud, unauthorized vegetation clearing, and non-compliance with environmental regulations. Strengthening monitoring, control, and enforcement systems is therefore the factor with the greatest potential impact on reducing deforestation.

From an economic perspective, in many contexts, land-use conversion activities remain more competitive than forest conservation and restoration, especially in the absence of robust economic signals that adequately value emissions removals and reductions.

Furthermore, regulatory uncertainty reduces the attractiveness of investments in forest projects, which are capital-intensive and long-term in nature. Excessive or unclear restrictions on the use of offset mechanisms can also limit market liquidity and efficiency, increasing costs and hindering mitigation at scale.

In Brazil, the private sector plays an essential role in expanding and implementing activities aimed at restoring degraded areas. However, the viability of these initiatives depends on the existence of financial and regulatory instruments compatible with their scale, risk profile, and time horizon, particularly in the case of native vegetation restoration.

The absence of such mechanisms undermines project implementation, especially those structured around the voluntary carbon market, which, although relevant, is still insufficient to meet the total demand required for large-scale restoration. Therefore, complementary instruments, such as regulated carbon markets (national and global), become essential to ensure economic viability and enable long-term investment mobilization.

A critical issue in operationalizing these scenarios is the inadequate incorporation of nature-based carbon removals. This limitation restricts the full utilization of the mitigation potential of the land-use sector, particularly in countries like Brazil, where restoration and sustainable forest management can generate removals at competitive costs.

As a central instrument to direct investments, Article 6 of the Paris Agreement (6.2 and 6.4) must effectively incorporate nature-based removals and be integrated with regulated markets to enable these activities at scale. This integration is key to mobilizing long-term capital, creating predictability, and establishing concrete conditions for expanding forest restoration.

(b) What potential levers, whether economic, financial, institutional, social or technological, exist for accelerating the implementation of the commitment to halt and reverse deforestation and forest degradation?

One of the main levers to accelerate the commitment to halt and reverse deforestation lies in the regulatory framework as a driver of financial flows, particularly through carbon markets.

The development of a global carbon market capable of supporting deforestation reduction depends primarily on the effective implementation of the instruments under Article 6 of the Paris Agreement.

Under Article 6.2, ITMOs (Internationally Transferred Mitigation Outcomes) represent a key mechanism for enabling international climate finance flows by allowing the transfer of mitigation outcomes between countries. For this mechanism to function effectively, jurisdictions must establish clear and predictable rules regarding eligibility, authorization, and use of these assets. The lack of such predictability has limited the development of a robust project pipeline, particularly in the land-use and forest sector.

Under Article 6.4, there is increasing misalignment between emerging criteria and the practical viability of nature-based projects. Requirements such as extended post-crediting monitoring periods, mandatory downward adjustments, and methodological approaches like “common practice” have significantly increased project complexity and risk, often rendering them economically unviable.

This misalignment extends beyond Article 6.4. Other international initiatives have adopted criteria that restrict or discourage nature-based solutions. For example, under CORSIA (Carbon Offsetting and Reduction Scheme for International Aviation), credits from ARR (Afforestation, Reforestation, and Revegetation) activities are not yet eligible. Similarly, discussions within SBTi have moved toward prioritizing high-durability removals, potentially marginalizing nature-based solutions despite their critical short- and medium-term role.

As a result, increasing regulatory fragmentation is observed, with different mechanisms adopting non-harmonized and sometimes inconsistent criteria. This fragmentation creates

uncertainty, raises transaction costs, and reduces investment mobilization capacity, particularly for forest projects.

Therefore, greater alignment among instruments and initiatives is essential, ensuring that criteria are compatible with the diversity of solutions across both the Southern Hemisphere and the Northern Hemisphere. In particular, nature-based solutions must be fully recognized as integral, not marginal, components of mitigation strategies.

Additionally, the integration of offsets into regulated carbon markets represents an important lever to scale restoration and conservation activities.

Another key lever is the advancement of interoperability among sustainable taxonomies. Brazil has taken a leadership role by proposing, in the context of COP30, the development of a "Super Taxonomy" to connect different classification systems. When well designed, interoperable taxonomies can guide investments, reduce risks, and accelerate actions to reduce and reverse deforestation.

Production Chains

Transforming production chains is a key strategy to avoid illegal deforestation. A central pillar is sustainable intensification, prioritizing the use of already cleared areas, especially degraded pastures. This includes adopting low-carbon practices, certification systems, traceability, and expanding technical assistance for producers.

Countries with large areas of degraded land have the opportunity to turn environmental liabilities into economic assets by increasing productivity, reducing emissions, and strengthening climate resilience.

In this context, innovative financial instruments are needed to ensure that loans and financing are linked to transition plans toward more sustainable production models and supply chain monitoring.

(c) What country, regional or sector experiences, best practices, and lessons learned can be shared regarding forest conservation and restoration?

One of the main lessons from Brazil's experience is the scale of the challenge and the need for economically viable solutions. Countries with abundant land and significant environmental liabilities must reconcile restoration, production, and financial viability.

Brazil's experience shows that financial mechanisms, especially carbon markets, are essential to enable large-scale restoration. The country has approximately 110 million hectares of degraded pastures, representing about two-thirds of total pastureland.

Additionally, expanding plantation forest on degraded lands can contribute to productive land recovery, generating economic value and increasing carbon stocks. These approaches are complementary but distinct from ecological restoration.

Brazil has policies promoting low-carbon production, restoration, and conservation, such as the ABC+ Plan and the National Program for the Conversion of Degraded Pastures (PNCPD).

The plantation forest sector stands out as a relevant example, delivering positive climate impacts and supporting environmental regeneration. Its potential as a provider of ecosystem services is linked to high productivity levels—34.4 m^3/ha for eucalyptus and 31.1 m^3/ha for pine in 2024.

A key practice is the use of degraded land, replacing low-productivity pastures with plantation forest that provide multiple ecosystem services. Another important approach is mosaic planting, which integrates commercial plantations with natural forest areas, creating ecological corridors and supporting biodiversity, water regulation, and soil conservation.

Forest conservation, sustainable management, plantation forest, and restoration initiatives should not be treated as isolated agendas but as interconnected components of a broader land-use strategy, a “forest continuum.”

Finally, Brazil’s experience highlights that international policies must reflect local realities to scale solutions, attract investment, and meet climate commitments.

Final Considerations

The effectiveness of a global roadmap to halt and reverse deforestation and forest degradation by 2030 will depend on its ability to move beyond ambition and translate commitments into implementable, scalable, and economically viable solutions.

Halting and reversing deforestation will only be feasible if forests are placed at the center of the climate and development agenda, not as a constraint, but as a strategic asset. By creating the conditions for standing forests to generate value, through carbon markets, sustainable value chains, and effective public policies, it will be possible to transform land-use systems, restore degraded areas, and establish forests as a lasting pillar of a low-carbon economy.

In this context, it is necessary to adopt an integrated approach that recognizes the forest continuum and combines conservation, sustainable production, plantation forest and restoration in order to position forests as central pillars of climate mitigation, biodiversity protection, and sustainable development.