

# CLARA

Climate Land Ambition and Rights Alliance

## CLARA's Response to call for submissions:

### COP 30 Presidency Roadmap for Halting and Reversing Deforestation and Forest Degradation by 2030

#### Introduction

The Climate Land Ambition and Rights Alliance (CLARA) appreciates the opportunity to submit our initial thinking on the Roadmap for Halting and Reversing Deforestation and Forest Degradation by 2030. CLARA is a global civil society network with over forty organizational members, as well as academics and advocates, bringing together specialists in different aspects of land policy, including agriculture, forests and human rights.

Deforestation, forest degradation and other land related issues generally do not receive sufficient attention in the international climate negotiations, so we were very pleased that the presidency insisted on maintaining the forest related roadmap along with the roadmap related to fossil fuels. It is essential to have climate action in the land sector, including around forests, receive robust attention and ultimately drive action, if the goals of the Paris Agreement, the UN Framework Convention on Climate Change, UN Convention on Biodiversity and related commitments are to be met. Furthermore, the situation is of the utmost urgency, and CLARA applauds the continued commitment to meeting the 2030 target to halt deforestation and degradation in forests.

Our key priorities for the roadmap are:

- 1) *The roadmap should be action oriented, looking to drive actual action on the ground.* There are plenty of commitments to stop deforestation, the roadmap must be focused on seeing those commitments result in ambitious action on the ground that actually meets those commitments. Building consensus is important, but we do urge continued movement with those who are willing, rather than compromising the ambition and integrity of the roadmap process.

- 2) *The roadmap must improve the conservation management of high integrity forests and facilitate recovery of degraded natural forests.* It is not enough to focus on forest cover. Differences in condition between primary/old growth forests, secondary natural forests and mono cultures of trees matters for their climate and biodiversity value and reducing the risk of losing carbon stored in forests to the atmosphere.
- 3) *The roadmap must exclude false solutions.* The urgency of the climate crisis is at times used as an excuse to push forward so-called solutions that hurt rather than help climate action. These include carbon markets, particularly with offsetting, and bioenergy with or without Carbon Capture & Storage (CCS) and monoculture plantations

We thank the Presidency once again for the opportunity to contribute to the roadmap and hope there will be future opportunities to comment on the Roadmap.

## **Intervention in Part One: Why Halting and Reversing Deforestation and Forest Degradation is Central to the Paris Agreement**

### *1. Paris Agreement, UNFCCC and other International Commitments*

As the outline notes, there is no shortage of references, initiatives and international agreements and mechanisms related to land and forests in the international policy space. Indeed, Article 5 of the Paris Agreement makes clear that these issues are central to the Paris Agreement, that parties should take action, and that includes “reducing emissions from deforestation and forest degradation.” This was reflected in the first Global Stocktake (GST) references to forests. And yet, this article and the goal in the GST has received far less attention in the climate negotiating space than other aspects of the Agreement. The challenge has been in turning this shared knowledge and, at times, even commitments and pledges into action. We would therefore urge, in addition to the grounding of the roadmap in the various existing commitments, that the action-oriented aspects of these international institutions be explored for clear connections and opportunities that can be identified and implemented. That should include climate finance institutions, who should be taking these roadmaps onboard into their strategies and decisions on funding support, as well as party driven processes such as the nationally determined contributions (NDCs), and newer entities such as the Just Transition Mechanism. In particular, we would urge exploration of the nascent non-market mechanism that has been operationalized under Article 6.8, which focuses on joint mitigation and adaptation projects. This joint approach is already mentioned in Article 5, in relation to forest climate activities.

### 3. Socioeconomic Aspects

There are critical socioeconomic aspects to consider in developing land and climate policy, and mapping out needed policies to stop continued deforestation and degradation. We urge that the roadmap give the needed consideration to the issue of land rights, especially the importance of Indigenous land rights, including tenurial and collective land rights and governance of forests by Indigenous Peoples. Secure land tenure is an essential element in achieving the roadmap's stated goals and that should be reflected in the weight they are given in the roadmap.

We also urge the roadmap to avoid the trap of viewing food rights, including food security, as in conflict with stopping deforestation and degradation. Food sovereignty and food security are critical for human rights, and are also perfectly compatible with halting deforestation. It is industrial agriculture, especially due to an overconsumption of forest-risk commodities such as meat in high income countries, that drives the conflict with forests. These large, commodity driven monoculture practices are driving deforestation and ecosystem destruction, and generally do not actually feed most of the world. The roadmap should embrace a just transition framework that does not shy away from the problems industrial agriculture creates for forests, exploring a needed just transition in agriculture away from these industrial agricultural practices towards an agroecological, ecosystem-based approach that supports forests and feeding people.

## Intervention in Part II – What Countries Can and Should Do

### 7. Bioeconomy

Biomass is a false solution that drives deforestation, while failing to deliver emissions cuts. The scientific record is clear and rather than focus on outlying cases in specific geographies, we urge the roadmap recognizes the harm the bioenergy industry has caused in forests and not urge expansion in the roadmap.

The implementation of technologies such as biochar or Bioenergy with Carbon Capture and Storage (BECCS) at scale would require growing biomass plantations on more than twice the land currently cultivated. These plantations would cause a massive loss of biodiversity due to habitat and food loss, as well as increased exposure to and decreased resilience to diseases. Additionally, fertilizer production and use would have to be scaled up, exacerbating the harms associated with it.

Biochar would also introduce unique pollution risks. In addition to using biomass for biochar, so-called feedstocks for it can include crop and wood residues, manure, tires, plastics, municipal waste, and sewage — all of which come with unique toxicity risks.

Toxins taken up by plants grown in biochar-amended soils may lead, over time, to the accumulation of deadly arsenic, cadmium, lead, and mercury in animals and humans. Humans and animals would also be exposed to these toxins as airborne pollutants.

Eliminating, phasing out and repurposing/reform of harmful subsidies that drive deforestation and biodiversity loss as agreed under Target 18 of the Kunming-Montreal Global Biodiversity Framework of the UNCBD. We urge the roadmap to reflect this agreement.

## **Intervention for Part III – Fostering International Cooperation and Addressing Regulatory Bottlenecks**

### *11. Carbon Markets*

Carbon markets are not a new proposition in the climate space. In fact, there are several decades worth of projects that can be scrutinized to determine their risks and possible benefits. The record is clear; not only are carbon markets a risk to communities, but overwhelmingly they fail to provide a real carbon benefit. Many carbon market mechanisms create loopholes for polluters while posing significant risks to human rights, the rights of Indigenous Peoples, and the environment.

Carbon markets present particular risks in the land sector. They have often been associated with forest conservation related projects, but they have a record of causing land grabs and other human rights violations. Additionally, they do not deliver on the promised carbon benefits, which creates additional risks as climate change impacts continue to grow. This is true even in the land sector; in 2023, over 90% of Vera's rainforest carbon credits were found to be junk.

Dangerous schemes like carbon markets and offsets, often generated from illusory technologies for CO<sub>2</sub> "removal" and geoengineering, primarily serve to delay effective climate action rather than delivering emissions cuts. Growing reliance on speculative Carbon Dioxide Removal (CDR) including to generate offsets, diverts efforts from addressing the root causes and drivers of the climate crisis and greenwashes fossil fuel expansion. Applied at climate relevant scales, these approaches will require enormous amounts of land, energy, biomass, water, and other resources, with no assurance of complete capture or permanence of storage. All come with substantial risks and impacts on ecosystems and communities, particularly those that are already suffering the most from climate change impacts.