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## THE FOREST STEWARDSHIP COUNCIL (FSC)’S SUBMISSION TO THE COP 30 PRESIDENCY ROADMAP ON HALTING AND REVERSING DEFORESTATION AND FOREST DEGRADATION BY 2030

### Part I. Why Halting and Reversing Deforestation and Forest Degradation Is Central to the Paris Agreement

The Forest Stewardship Council (FSC) welcomes the Brazilian Presidency’s consultation on a roadmap to halting and reversing deforestation and forest degradation as a critical step toward achieving global climate and biodiversity goals. This initiative reflects the growing recognition of forests as a cornerstone of nature-based solutions to tackle climate change, biodiversity loss, and a transition towards a responsible bioeconomy through sustainable development. Since its inception, FSC has championed the integration of robust forest governance into global climate frameworks with comprehensive rules, including on-site third-party audits.

FSC looks forward to further contributing to this process as it moves forward, collaborating with stakeholders and rightsholders to ensure responsible forest stewardship remains at the heart of global climate solutions, and enabling the outcomes delivered by this roadmap.

Halting and reversing deforestation and forest degradation is vital for ensuring food security, climate resilience, and human well-being. Forests support over one billion people and shelter 80% of terrestrial plant and animal species, including about 60% of vascular plants mainly in tropical regions. They regulate water cycles, sequester carbon to help limit global warming to 1.5°C, and play key roles in climate adaptation and food security. Their economic value, including ecosystem services, is estimated at USD 150 trillion—nearly twice the value of global stock markets in 2020 (Forest Declaration Assessment: 2025).

The sources and research on prior work meticulously detail every action and key item. Below is a non-exhaustive list of references that we consider relevant in supporting this chapter:

- [Forest Declaration Assessment: 2025](#) progress report
- [IPBES Business and Biodiversity Assessment, Summary for Policymakers: 2026](#)
- UNEP-FI [State of Finance for Forests: 2025](#)
- FCLP’s [Unlocking Forest Finance Roadmap](#)
- [PAS for Integrating Deforestation Into Financial Decision-Making](#)
- [PAS REDD+ and combating deforestation](#)
- [PAS TFFF PES and Forest Conservation](#)

### Part II. A. What Countries Can and Should Do

The Roadmap for Halting Deforestation and Forest Degradation, led by the COP30 Presidency, offers a pivotal opportunity to tackle two of the most critical barriers preventing progress:

#### Align and mobilize ambitious political leadership

One of the most significant barriers to addressing global forest challenges remains the absence of strong, actionable, and coordinated political leadership at the highest levels. History demonstrates that transformative global achievements - such as the Montreal Protocol, the Lead Paint Convention, and ILO child labor standards - were driven by ambitious coalitions fueled by decisive political will.

Global leadership and collaboration on responsible forest stewardship are critical. Without it, the global economy - deeply reliant on forests - faces dire risks, and the goal of halting forest loss will remain out of reach, threatening economies, livelihoods, and our collective survival. The COP30 Presidency has the unique opportunity to drive progress by leveraging this Roadmap to convene ambitious countries and show leadership within a unified coalition for global forest stewardship.

This coalition must be designed to halt and reverse deforestation and degradation, with countries and civil society working side by side in a coordinated and flexible common front. Key priorities must include:

- *Establishing a High Ambition Coalition* of countries and non-state actors to champion responsible forest stewardship in coordinated efforts across conventions, national policies, budget lines, and bilateral/multilateral agreements.
- *Agreeing to collectively embed commitments to address deforestation & degradation* into national regulatory frameworks and financial instruments. Including climate-related forest policies, finance, and actions, reflected in BTRs and NDCs 4.0.
- *Driving integrated action* to jointly address climate and biodiversity challenges at both international and national levels, delivering outcomes that enhance forest resilience and adaptation to climate change.
- *Building solidarity-based structures* to ensure equitable access and benefit-sharing mechanisms to ensure that all types of forest stewards have access to resources to finance their forest stewardship. Enshrine the principle of justice recognizing that forest protection is a states' obligation owed to vulnerable communities and future generations, as affirmed by the ICJ's advisory opinion on climate change.
- *Build on COP30 outcomes* including the COP30 Action Agenda (Axis 2, #5 and #6), the Plans of Accelerated Solutions (PAS), the IPLC Forest Tenure Pledge, the Tropical Forests Forever Facility (TFFF), and DCF Finance commitments. The Climate Champions Team can have a key role in a facilitative role in driving the Roadmap's implementation.

The Roadmap must outline concrete next steps to be undertaken after COP31, including the establishment of an interim governance structure for its implementation to ensure follow-up and immediate and effective implementation.

### **Dismantle the economic barrier of misaligned subsidies**

There is an urgent need to confront the fundamental economic imbalance where forests are often more valuable when cut down than left standing. To address this, the Roadmap must prioritize systemic reforms that transform global, national and local financing and fiscal frameworks. These reforms should ensure that the value of standing forests is effectively captured, protected, and rewarded. Without such changes, the drivers of deforestation will continue to persist despite all efforts.

We note with concern that **subsidies** are not mentioned in the index circulated so far. This omission is critical, as the *State of Finance for Forests: 2025* highlights a stark reality: for every US\$0.20 invested in forest-based nature-based solutions, US\$1 is spent on subsidies that exacerbate deforestation. This imbalance highlights the urgent need to redirect financial flows to ensure that working lands and sustainably managed forests are responsibly maintained long-term, while conservation and protected

forests receive adequate resources to prevent encroachment and degradation. Ultimately, realigning incentives, subsidies, and funding is essential to secure conservation efforts and effectively scale up restoration initiatives.

Much of the technical knowledge required to support this shift already exists in reports, studies and standards. Furthermore, tools such as FSC Certification or indeed, other ISEAL code compliant schemes are widely available; to guide implementation of standards and to connect these to markets that value these additional efforts. Such resources could be synthesized into a unified Roadmap structure. For example, the *Forest Declaration Assessment 2025* provides a robust analysis of barriers and highlights examples of progress toward achieving the 2030 forest goals. Such insights can guide the development of more detailed actionable political strategies and policy frameworks that can further drive uptake of existing knowledge and tools.

At FSC, we recognize that addressing these challenges requires a multi-faceted and collaborative approach. Commodity-driven levers and barriers must be prioritized due to their immediate potential to impact deforestation rates positively.

It is important to note, in the current context of shifting subsidies and financial priorities, that steadfast commitment and strategic realignment are crucial to achieving our conservation and restoration goals. However, in the face of geopolitical, economic, and social challenges, we must remain steadfast in our ambition. Compromising for the lowest common denominator is no longer an option to achieve the 2030 goals. FSC fully supports a long-term, comprehensive, and incremental approach that is bold and unwavering in its ambition to halt deforestation and restore forest ecosystems. By combining urgent action with high aspirations, we can ensure lasting progress toward a sustainable future for forests, as well as the communities, economies, and ecosystems that depend on them.

## **Part II. B. Sub-sections on Deforestation, Forest Degradation, Restoration, Sustainable Forest Management, and Conservation**

FSC has compiled a list of barriers, levers, policies, and case examples corresponding to each sub-section outlined in Section II of the circulated draft Roadmap index, noting that this is a non-exhaustive list and these and many more are detailed in the *Forest Declaration Assessment 2025* amongst other key publications.

### **Barriers to address Deforestation, Forest Degradation, Restoration, Sustainable Forest Management, and Conservation:**

- *Demand-Driven Commodity Deforestation: Lack of investment in effective supply chain controls:* There is a critical gap in robust systems to ensure supply-chain traceability and data interoperability. Without effective controls, it becomes challenging to monitor and mitigate deforestation linked to commodity supply chains. Moreover, effective controls help monitor deforestation and ensure that forest stewards—who support commodity production and responsibly manage the forest—receive a fairer share of the benefits.
- *Harmful subsidies & Lack of financing for forest conservation and restoration activities:* Governments worldwide spend more than USD 2 trillion each year on subsidies that negatively affect the climate and natural environment ([Earth Track: 2024](#)). Although many countries have made commitments to phase out these environmentally harmful subsidies, progress has been slow, and so far, these pledges have not been fully realized.
- *Land Governance and Encroachment - Lack of legal recognition of land tenure rights:* This leads to threats of displacement and undermines local stewards' roles in protecting forests against land conversion and deforestation. Without secure land tenure, Indigenous Peoples and Local

Communities that are forest stewards are often marginalized from decision-making processes, which exacerbates the risk of forest loss.

- *Weak regulatory frameworks:* Our legal frameworks must laser-focus on rights-based approaches, including exploring innovative legal models such as granting “legal personhood” to forests, to ensure their protection and restoration are enshrined in our institutions while empowering stewardship and civic action. There is much to be learned from the progress and experiences of the “Rivers” movement.
- *Weak enforcement mechanisms:* Ineffective policies and weak enforcement allow illegal land encroachment and conversion, which drive degradation and deforestation unabated. Often, short-term economic interests are prioritized over long-term goals, undermining efforts toward sustainable forest management that drive ecosystem, economic and social value. However, it is important to note that existing enforcement mechanisms require a thorough review to ensure they are fit and financed for purpose. This review must also guarantee that stakeholders and rights holders—including, but not limited to, women, youth, Indigenous Peoples and other key local communities and forest stewards—are meaningfully consulted and involved, with full respect for Free, Prior, and Informed Consent. A good illustrative case of such an approach is the [FSC FPIC guide](#).
- *Lack of long-term solutions to prevent non-commodity driven deforestation and degradation:* For instance, the lack of robust measures to prevent forest fires and insect infestations remains a critical issue, as these are also key drivers of deforestation and degradation.
- *Lack of budget and financial plans remain a significant barrier:* Even when budgets are allocated, poor governance, weak oversight, and ineffective enforcement often lead to under-execution or misallocation of funds, hindering conservation and restoration efforts. Additionally, governance weaknesses such as corruption and fragmentation increase transaction costs, further limiting the effectiveness of financial resources (FAO and UNEP. 2020. The State of the World’s Forests 2020. Forests, biodiversity and people; [Fundación Vida Silvestre:2025](#)).
- *Halting Degradation Ineffective governance structures and lack of financial loans for community-based projects:* Local communities and forest stewards often lack access to the necessary financing and governance support to implement sustainable forest management and restoration initiatives. They are frequently placed in a position where their livelihoods depend on the extractive value of forests, with limited options to obtain economic value from conservation and restoration of these ecosystems.

## **Levers to address Deforestation, Forest Degradation, Restoration, Sustainable Forest Management, and Conservation:**

To overcome these barriers, it is essential to leverage targeted policy interventions, financial incentives, strengthened governance, community engagement, and integrated technical solutions that collectively drive systemic change and sustainable forest outcomes. Below is a list of critical levers that must be mobilized urgently to address the challenges across deforestation, forest degradation, restoration, sustainable forest management, and conservation:

### Institutional Levers:

- *Investment & Innovation in Enforcement approaches:* Strengthening enforcement mechanisms to ensure they are fit-for-purpose and uphold forest protection laws is essential. This requires meaningful, innovative investments to enhance the involvement of rights holders and Indigenous Peoples in their design, alongside streamlining due diligence and supply chain transparency.

Complementing traditional enforcement with robust assurance systems—such as ambitious third-party certifications like FSC—is critical for a targeted, cost-effective approach. FSC’s rigorous standards and independent audits verify that deforestation is prohibited, workers’ and communities’ rights are protected, and biodiversity is safeguarded, driving stronger commitments to halt and reverse deforestation.

- *National Parks and Biosphere Reserves*: Expanding protected areas, including national parks and UNESCO biosphere reserves, to safeguard biodiversity and conserve critical forest ecosystems. This expansion must be undertaken with the free, prior, and informed consent (FPIC) of Indigenous Peoples, youth and women, alongside specific safeguards to respect their rights and livelihoods.
- *Recognition of Indigenous and Local Communities’ Rights*: Strengthening land tenure and governance rights of Indigenous and local peoples, and providing them with support to enforce these rights, is vital in acknowledging that they are the most effective forest stewards.
- *Institutionalized and long-term recognition of Indigenous knowledge systems* in forest governance is essential. These knowledge systems offer invaluable lessons for sustainable forest stewardship, and failing to acknowledge and integrate them into forest management plans represents a loss for all.

### Social Levers

- *Community-Led Stewardship*: Empowering local communities to lead forest management efforts through capacity-building, equitable benefit-sharing, and inclusive decision-making.
- *Education and Awareness Campaigns*: Raising awareness about the importance of deforestation-free practices and their impact on climate and biodiversity, especially targeting consumers, businesses, and policymakers.

### Technological Levers

- *Remote Sensing and Monitoring*: Leveraging and ensuring interoperability among satellite imagery, geo-location, AI, Isotope, DNA and blockchain-based traceability technologies to monitor deforestation rates and their key drivers, with alert for enforcement officials/local stewards in near real-time, ensuring a response that is more targeted, efficient and transparent.
- *Restoration Technologies*: Innovations in reforestation techniques, such as drone-assisted tree planting, to scale up restoration efforts.
- *Sustainable Agriculture Practices*: Promoting agroforestry and regenerative agriculture to reduce pressure on forests and make food systems more resilient to maintain livelihoods.

### **Illustrative cases**

A non-exhaustive selection of illustrative cases is presented here, while we acknowledge that numerous other publications—such as the Forest Declaration Assessment 2025—provide a far more comprehensive and detailed compilation of cases and analyses related to deforestation, forest degradation, restoration, sustainable forest management, and conservation.

### Deforestation

- *Integrating Risk Assessments into Taxonomies*: Malaysia’s central bank discourages financing palm oil plantations linked to deforestation through its 2021 Climate Change Principle-Based Taxonomy.

- *Supervisory Mandates Addressing Nature-Related Risks:* The Central Bank of Brazil includes deforestation and forest fires in its definition of environmental risks, influencing financial systems. Other central banks, such as the European Central Bank and the Bank of England, are incorporating nature's loss into their mandates to support climate-resilient and nature-positive economies.

### Forest Degradation

- *FSC Certification in Gabon:* Research using 1.3 million camera-trap images across 14 logging concessions demonstrated that FSC-certified areas had higher mammal encounter rates, particularly for large species like forest elephants and western lowland gorillas, compared to non-certified areas. This highlights the role of certification in mitigating biodiversity loss and reducing ecosystem degradation- essential for reducing the long-term risk of deforestation.
- *FSC Risk Assessment Framework:* This tool evaluates risks associated with sourcing forest materials, covering 64 indicators related to social and environmental factors. It helps companies address risks from uncertified areas, reducing degradation, and ensuring supply chain integrity. FSC's risk assessment framework includes an explicit indicator that must be assessed against when being used in sourcing.

### Restoration

- *Forest Bonds for Restoration:* Malaysia plans to release a sovereign biodiversity sukuk worth USD 210 million to fund reforestation and restoration. Similarly, the World Bank's Amazon Reforestation-Linked Bond, launched in 2024, mobilizes USD 225 million for reforestation in the Brazilian Amazon, linking financial returns to carbon removal through restoration.
- *Payment for Ecosystem Services Markets:*
  - High Integrity Forest Investment Initiative (HIFOR): This performance-based PES scheme finances high-integrity tropical forests that lack access to carbon finance. Pilot projects in the Republic of Congo and Brazil enable forest owners to generate and transact "HIFOR units," representing verified climate and biodiversity benefits.
  - *FSC's Verified Impact Program:* This program allows forest managers to quantify the positive impacts of FSC Forest Management practices on ecosystem services. It will also support the development of High-Quality Carbon and Biodiversity Credits, promoting sustainable forest management practices.

### Sustainable Forest Management that Drives Bioeconomy and Agroforestry (SFM)

- *Tax Incentives for Forest Certification in Gabon and Cameroon:* Gabon's tiered tax policy incentivizes sustainability certifications, such as FSC, by reducing taxes for certified companies. Early evidence suggests that this approach has increased certification uptake compared to neighboring countries.

### Conservation:

- *Community-Driven Conservation in Gabon:* The community of Massaha in northeastern Gabon used participatory mapping to document ancestral villages, sacred sites, and traditional land uses within a rainforest threatened by industrial logging. This biocultural mapping led to government action to halt logging and initiate formal conservation measures.

- *Central Bank of France's Biodiversity Disclosures*: The Central Bank of France discloses the biodiversity impact of its equity and corporate bond portfolios, setting an example for integrating conservation considerations into financial systems.
- *NGFS Conceptual Framework for Nature-Related Financial Risks*: Published in 2024, this framework provides tools for central banks and financial supervisors to integrate nature considerations into financial risk assessments, supporting conservation efforts.
- *Colombia's 2024 biodiversity bond* — the world's first — directing USD 70 million toward biodiversity conservation and sustainable agriculture.

### Part III. On Fostering International Cooperation and Bottlenecks

The Roadmap must complement, unify, and accelerate decades of international efforts to halt forest loss, rather than create new bodies or processes. It should leverage existing multilateral initiatives and financial mechanisms—including the Forest & Climate Leaders' Partnership, FAO Forestry Roadmap, UN Forum on Forests' Strategic Plan, the Rio Conventions (CBD and UNCCD), REDD+ and its Community of Practice, Article 6 and carbon markets, as well as emerging instruments like the Tropical Forest Forever Facility and bioeconomy initiatives.

Beyond mobilizing a coalition of ambitious countries on forests & dismantling the economic barrier of misaligned incentives & subsidies that was cited earlier in this submission as key priorities, there are three other key levers in terms of International Cooperation that need to be underscored.

#### Legacy setting

The COP30 Presidency has a unique opportunity to leave a lasting legacy by positioning the Roadmap as a cohesive vision for the Rio Conventions, which share the common goal of halting forest loss. The Roadmap must unlock synergies between these Conventions to maximize limited funding and deliver major economic, social, and environmental benefits—while reducing fragmentation and inefficiencies that cost the world \$10–25 trillion annually.

#### Triple COP year

We urge the COP30 Presidency to take the opportunity of 2026 being a triple COP year and leverage all the intersessional and consultative moments to engage other Rio Presidencies and Conventions to build momentum on the Roadmap and create a convening space for high-ambition countries to advance key next steps together. Leveraging platforms like the Synergies Collaboration Platform and the Joint Liaison Group will be crucial to incorporate expertise and processes from the CBD and UNCCD.

#### Connect the Transition Away from Fossil Fuels with the Roadmap on Halting and Reversing Deforestation and Forest Degradation by 2030

The protection of forests plays a dual and critical role in the global effort to combat climate change, complimenting the transition away from fossil fuels. Forest ecosystems not only act as carbon sinks but also represent vital biodiversity reserves. However, these essential areas are frequently threatened by mining, oil exploration, and other extractive industries. Establishing fossil fuel-free zones within and around forests would create a protective barrier, preventing extractive industries interests from exploiting these areas, and allow to mutually leverage both roadmaps for maximum impact.

Additionally, Indigenous Peoples (IPs), who are often the stewards of large, forested areas, are typically left without legal or financial means to prevent extractive industries from encroaching on their lands. To address this gap, it is crucial to include a dedicated section in both the forest protection roadmap and the fossil fuel transition roadmap that explicitly connects these two goals. This work must focus on empowering

IPs with tools, funding, and legal frameworks to safeguard their lands against fossil fuel-related activities and supporting them in the stewardship of forests and other integral ecosystems.

#### Further International cooperation commodity-driven economic and finance levers

- *Debt-for-Nature Swaps*: Countries can reduce external debt by committing to invest in forest conservation, creating win-win solutions for both creditors and ecosystems.
- *Fiscal Instruments*: A global fiscal instrument on carbon emissions or deforestation-linked commodities (e.g., palm oil, soy, beef) could generate funding for reforestation and conservation initiatives.
- *Payments for Ecosystem Services (PES)*: Compensation mechanisms for communities and landowners who manage forests sustainably, ensuring that ecosystem services are valued economically.
- *Green Bonds and Climate Finance*: Green bonds and climate-focused financial instruments can fund large-scale reforestation projects and sustainable forest management.
- *Private Sector Investment*: Mobilizing private sector funding through partnerships and corporate commitments to deforestation-free supply chains. (More info here on [N4C's brief](#)).

#### **Conclusion and final thoughts**

The Forest Stewardship Council appreciates the opportunity to contribute to this Roadmap and remains committed to supporting its implementation throughout the year. As we progress toward 2030, it is vital that countries—guided by the principle of common but differentiated responsibilities and capabilities—have the flexibility to pursue diverse pathways to combat deforestation, whether through net deforestation or absolute deforestation approaches.

A net deforestation approach, which balances forest loss with reforestation and restoration, aligns with both the mitigation hierarchy and the precautionary principle. This approach allows for incremental progress while addressing urgent needs and offers a practical pathway for countries or stakeholders with limited resources or pressing development priorities to contribute meaningfully without overextending their capacities. However, it is crucial that such incremental progress maintains ambition and is not diluted by minimal change.

The ultimate goal must remain the elimination of absolute deforestation by 2030—halting deforestation entirely. Countries with greater resources, stronger governance, and advanced technological capacities should lead by setting absolute deforestation targets, fostering innovation, and accelerating global progress.

FSC advocates using the next two years, culminating in COP32, as a pivotal period for comprehensive planning and ambition-setting. This milestone presents a critical opportunity to ensure the global vision for forests remains bold, transformative, and effective.