

IETA Submission on “COP30 Presidency Roadmap on Halting and Reversing Deforestation and Forest Degradation by 2030”

March 2026

We welcome this opportunity to contribute to the elaboration of the “[COP30 Presidency Roadmap on Halting and Reversing Deforestation and Forest Degradation by 2030](#)”. As the trusted business voice on carbon markets, IETA represents approximately 300 member companies around the world. Since 1999, we have contributed actively to the development and evolution of the Clean Development Mechanism (CDM), Article 6 of the Paris Agreement, multiple Emissions Trading Systems and Voluntary Carbon Markets globally.

IETA and its members recognize that halting and reversing deforestation by 2030 is a priority for achieving the Paris Agreement targets and requires a significant mobilization of capital, which can be facilitated by unlocking high-integrity carbon market instruments.

In the sections below, we outline our contributions to the roadmap. In this context, we want to emphasize the role of international forest finance, carbon markets, sustainable value chains, and cooperative approaches under Article 6 in supporting forest conservation and restoration, as well as in closing the current forest finance gap.

(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?

1. The persistent gap between the scale of finance needed to halt deforestation and restore forests, and the availability of predictable, investment-ready instruments that can adequately channel private finance flows to forests and communities through nature-based solution (NBS) carbon projects reflects a set of underlying barriers. Forest carbon activities often face long lead times, high upfront costs, fragmented land tenure, policy uncertainty, and limited alignment between project-level initiatives and broader jurisdictional or national accounting frameworks¹, highlighting broader challenges related to governance and integrity.

¹ IETA, ALMA Brasil: “Scaling up NCS activities in the Brazilian Amazon” (2025) https://www.ieta.org/uploads/wp-content/Resources/Reports/ALMABrasil_Report_IETA_Rev_121225.pdf





In many countries, uncertainty around authorization, corresponding adjustments, benefit-sharing, and the lack of clarity on the interaction between voluntary, jurisdictional, and Article 6 approaches continues to delay investment decisions².

2. The methodological uncertainty for nature-based activities under the Article 6.4 Paris Agreement Crediting Mechanism (PACM). IETA has consistently warned³ that overly rigid approaches to non-permanence and reversal risk can create a de facto exclusion of land-based activities by imposing impractical monitoring and liability requirements. If nature-related methodologies under PACM are not operationalized in a workable manner, an important channel for scaling high-integrity carbon finance for forest conservation and restoration will remain constrained and will limit the mechanism's ability to channel resources to some of the most climate-vulnerable communities on the frontlines of deforestation.

(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?

1. The Roadmap should recognize Article 6 as a practical tool to unlock finance for forest conservation and restoration, including through nesting approaches. Nesting can improve consistency in carbon accounting, avoid double counting and leakage, support fair benefit-sharing, harmonise safeguards in territories and strengthen confidence that investments contribute coherently to national climate goals⁴. This is especially important where countries seek to combine project-based activity, jurisdictional REDD+ programmes, and national accounting under the Paris Agreement.

In this context, it is also important that the Article 6.4 Supervisory Body prioritize work on nature-related methodologies in a pragmatic and action-oriented manner, so that the PACM can become a viable channel for high-integrity forest conservation and restoration activities.

2. The Roadmap should encourage countries to provide clearer policy signals for promoting conservation and restoration through international cooperation, including transparent rules for authorization, accounting, safeguards, and land-tenure arrangements. Predictability in

² IETA: "Article 6 in Action: Business Insights & Implementation Trends" (2024) <https://www.ieta.org/article-6-in-action-business-insights-implementation-trends>

³ IETA "PACM 6.4: IETA Submissions and participation on the Standard Addressing non-permanence and reversals in mechanism methodologies" (2025) <https://www.ieta.org/pacm-6-4-ieta-submissions-and-participation-on-the-standard-addressing-non-permanence-and-reversals-in-mechanism-methodologies>

⁴ IETA, ALMA Brasil: "Scaling up NCS activities in the Brazilian Amazon" (2025) https://www.ieta.org/uploads/wp-content/Resources/Reports/ALMABrasil_Report_IETA_Rev_121225.pdf





these areas is essential to attract private capital, reduce risk, and enable long-term partnerships across governments, companies, investors, and local stakeholders.

3. The Roadmap should **support sustainable value chain implementation as a complement to carbon finance, not a substitute**. Carbon markets can enhance the economics of conservation and restoration by creating incentives for investment in sustainable local production systems, agroforestry, and restoration supply chains, while supporting a forest-based bioeconomy that reinforces the value of standing forests, strengthens local economies, and provides sustainable livelihoods beyond carbon revenues in the long-term.

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

1. An important lesson from IETA's work on carbon markets is that integrity and scalability should be pursued together. Jurisdictional and project-based approaches should not be framed as competing models – when properly designed, they can coexist through nested architectures that align baselines, accounting, and benefit-sharing⁵. IETA's ALMA Brasil⁶ Initiative provides a practical example of this effort, supporting the development of nesting approaches for REDD+ activities within jurisdictional programmes. By addressing methodological alignment, MRV and accounting, regulatory coherence, and social and environmental integrity, ALMA Brasil contributes to the development of credible and operational models for integrated carbon market frameworks.

The state of Pará, in Brazil, serves as the initiative's initial case study, given both its relevance for land-use mitigation and its evolving institutional landscape. As a technical and collaborative platform, ALMA Brasil is designed to generate scalable and replicable approaches that may help inform similar efforts in other jurisdictions.

2. Another key lesson is that forest finance frameworks need to be practical. Approaches to permanence that rely on only one type of risk management or impose very long post-crediting obligations on nature-based activities risk, exclude private sector finance which is essential for scaling global climate efforts. A more effective approach is to manage reversal risk through a combination of measures over time, including buffers, monitoring, insurance or guarantee-like instruments⁷, as well as exploring innovative solutions that can increase resiliency to projects

⁵ IETA, ALMA Brasil: "Scaling up NCS activities in the Brazilian Amazon" (2025) https://www.ieta.org/uploads/wp-content/Resources/Reports/ALMABrasil_Report_IETA_Rev_121225.pdf

⁶ <https://www.ieta.org/initiatives/alma-brasil-initiative>

⁷ AFF: The Permanence Trust. <https://www.forestfoundation.org/permanence-trust/>





and programs and support the long-term continuity of REDD+ activities beyond crediting periods.

(d) How can forest conservation, sustainable management, and restoration best reflect the diverse realities of countries at different stages of development, the rights and knowledge of indigenous peoples and local communities, and different degrees of forest cover?

Forest conservation, sustainable management, and restoration approaches can reflect diverse national circumstances by adapting implementation to different national contexts, including stages of development, institutional capacities, and forest status, such as high forest cover/low deforestation countries and those facing ongoing deforestation pressures.

It also requires ensuring the participation of Indigenous Peoples and local communities in governance, applying safeguards, achieving consent through transparent consultation processes, and providing access to fair benefit-sharing mechanisms. Linking conservation outcomes to sustainable economic activities, such as agroforestry and forest-based value chains, can further align these efforts with local development priorities and integrate carbon programs and projects with government policy goals.





ABOUT IETA

IETA is a non-profit organization representing approximately 300 businesses committed to smart, well-designed and effective carbon markets to help achieve the goals of the Paris Agreement and reach net-zero emissions by 2050.

At IETA, we believe in a collaborative approach to addressing climate change through the power of carbon markets. Since 1999, IETA has been the leading voice of business on ambitious, market-based climate change solutions and driving net zero. We advocate for trading systems for emissions reduction and removals that are environmentally robust, fair, open, efficient, accountable, and consistent across national boundaries. We pride ourselves to be involved in and influence policy design, thought leadership, global capacity building, best practice and knowledge transfer.

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