

# Consultation Response

## *COP30 Presidency Roadmap on Halting and Reversing Deforestation and Forest Degradation by 2030*



## Introduction

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At COP26 in Glasgow, 145 countries committed to halt and reverse forest loss and land degradation by 2030. Six years on, we are not on track to meet this target. An average 10% annual reduction from the 2018–2020 baseline was required to reach zero deforestation by 2030. Instead, the annual global deforestation rate in 2024 was only 2% below that baseline.

We welcome the Brazilian Presidency's focus on a Forest Roadmap which is urgently needed. Brazil as COP30 Presidency but also a domestic leader in successfully tackling deforestation is well placed to put the world back on track to achieving these 2030 targets.

We submit this response as a coalition working at the intersection of climate, nature, and finance, with experience supporting public, private, and philanthropic action on forest protection and restoration.

Seven out of nine [Planetary Boundaries](#), the life support systems for the planet, have now been breached according to leading Earth system science, and the restoration of the Three Basin forests is of the most important actions to take to bringing these boundaries back to safe operating zones.

This action-orientated Roadmap must tackle the systemic barriers that are keeping deforestation rates stubbornly high while looking at how to immediately incentivise national action given the urgency of timelines.

Our response below addresses each of the four consultation questions in turn.

## Question 1: Critical Barriers and Solutions

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*What are the most critical barriers preventing the halting and reversing of deforestation and forest degradation?*

We identify **seven** interconnected barriers, each of which must be addressed as part of a coherent strategy. Some of these barriers can be readily addressed by nations acting largely independently or with one or two close partners, some are more systemic and require cooperation across more complex processes and institutions. A successful Roadmap should accelerate all but especially reward positive progress given the immediate need to see action which will inspire further ambition.

### 1. Nature Crime and Law Enforcement

Half of all tropical deforestation is illegal, yet enforcement remains weak across many jurisdictions. Prioritised funding for enforcement facilities, utilising technological advancements

in tracking deforestation, supply chain traceability and direct support to indigenous peoples and local communities as forest guardians should be prioritised as near-term national actions. For example, satellite monitoring systems and commodity traceability such as CAR system combined with real-time enforcement responses demonstrate how technology can support tackling illegal deforestation when paired with political will

Although forest law enforcement sits firmly within the jurisdiction of the state authorities, we see clear appetite for expanded public-private and philanthropic partnerships and investment to strengthen on-the-ground enforcement capacity in key deforestation and biodiversity hotspots. The full enforcement of existing forest law must therefore be a priority in this Roadmap.

## **2. Science as a solution**

A greater understanding of the Three Forest Basins is needed to feed into national, regional and international risk assessments and to strengthen the investment case for standing forests. There is no shortage of information to hold back current investment as the Amazon Basin Science Panel, among other initiatives, have already shown the immense value which the forest basin brings to us all such as supporting rainfall to North America agriculture. However, investment in forest science is still critical to better understand these complex ecosystems and how they are responding to stress – like Amazon FACE. In particular, the Congo Basin is the forest which is least known, efforts should be made to increase support and investment into the Congo Basin Science Panel and how the health of this ecosystem supports the Planetary Boundaries. This science and better measuring has been used in Brazil as the foundation for the bioeconomy.

## **3. Trade in Agricultural and Mined Commodities**

Trade in agricultural commodities (soya, palm oil, beef and leather products, and cocoa) remains a primary driver of forest loss and degradation. Despite the Glasgow commitment to facilitate trade and development policies that promote sustainable commodity production without driving deforestation, progress on this agenda has been limited.

The Forest, Agriculture and Commodity Trade (FACT) Dialogue, co-established by the UK and Indonesia, created an important platform for aligning import and export standards. However, it has stalled at the level of technical knowledge exchange and requires renewed political attention to generate concrete action on deforestation-free trade. Critically, a fragmented approach among importer countries, exemplified by the EU's unilateral sustainability criteria in EUDR, has undermined producer country sovereignty and created a split market rather than raising standards across the board.

This new Roadmap should rekindle the political aspiration of the FACT dialogue to align standards between producer and consumer countries, raising global expectations instead of creating fragmented markets. This political energy must also improve transparency, traceability, and farmer livelihoods at the whole-market level in a way which rewards sustainability and fair income rather than creating compliance burdens for exporters.

There have been some encouraging signs of progress: Malaysia's MSPO v.2 represents a step change in palm oil transparency; the Pará State cattle traceability commitment demonstrates subnational leadership; and the COP26 Traders Roadmap <sup>1</sup>- involving 12 of the largest agri-commodity traders - has advanced major sourcing commitments. However, the Traders Roadmap also illustrates the risk of narrow scope: by excluding Bolivia, the initiative has

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<sup>1</sup> <https://www.tropicalforestalliance.org/ag-sector-roadmap-updates>

displaced soy-linked deforestation rather than eliminating it highlighting the importance of full geographic coverage in supply chain initiatives.

Not covered by the Glasgow agreements but a growing area of concern are mined commodities which intersect with forest ecosystems. We are seeing increased pressure on forests from illegal extraction of metals (see point 1) as demand for these increase, with a particular focus on transition minerals. Strengthening the enforcement of laws, increasing transparency & traceability of these mined commodities and introduced aligned producer-consumer standards is urgently needed as this pressure is only increasing.

Brazil's leadership in collaborating with China on sustainable soy supply chains within this new Roadmap would be one of the most powerful national signals of commitment to this agenda to revitalise political momentum. Brazil would also be well placed to instigate dialogue on new standards regarding mined commodities.

#### **4. Forest Finance**

We endorse the FCLP Forest Finance Roadmap as the primary framework for driving global action on forest finance. It sets out a credible pathway to mobilising \$66.8 billion per year by 2030 across six mutually reinforcing solutions: Tropical Forest Finance Facility (TFFF), jurisdictional REDD+ (J-REDD+), the sustainable bioeconomy, value chain finance, targeted public finance, and sovereign debt management. This is the first government-led framework to articulate a coherent and flexible vision for closing the forest finance gap, and its reference in the Baku to Belem Roadmap should be built upon.

Scaling voluntary carbon markets is a central element of this strategy. Jurisdictional REDD+ alone could contribute between USD 3 and 6 billion annually by 2030 but realising this potential requires both increased technical support to countries developing J-REDD+ credits and active efforts to stimulate demand in key markets.

Mobilising private finance in support of forest-safe value chains and the bioeconomy is equally essential, repositioning forests not merely as conservation objects but as viable private investment opportunities in the transition to a new forest economy.

#### **5. Undervaluation of the Three Basins as Global Infrastructure**

The Amazon, Congo, and Borneo-Mekong forest basins<sup>2</sup> are critical ecosystems in the full functioning of the planet. Seven out of nine planetary boundaries are now beyond safe operating zones but full protection and restoration of the three forest basins would be a remarkable step to bringing these back into a safe operating zone.

Framing these Basins as planetary infrastructure critical for healthy, secure and resilient life on Earth will ensure they are fully valued, a necessary precondition for unlocking investment at the required scale.

Adopting this framing would enable greater prioritisation in international finance, stronger coordination across ministries, and more effective mobilisation of public and private capital

Country or trans-boundary basin packages based on restoring these basins offer a promising mechanism to deliver coordinated frameworks that bring together relevant ministries and simplify engagement with a range of international partners, enabling a more holistic mobilisation of finance around national forest, climate, and biodiversity goals.

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<sup>2</sup> <https://www.planetaryguardians.org/phc2025#threebasinsreport>

## 6. Wildfire Management

Extreme wildfires represent a growing and underappreciated threat to forests, biodiversity, and human health. Without systematic investment in prevention, preparedness, and resilient landscape management, conservation and restoration gains will be undermined. The 2023 Canadian wildfires serve as a stark illustration: they were among the most significant drivers of forest loss that year, underscoring the need for wildfire risk reduction to be treated as an integral component of forest strategy. Brazil has once again been a leader in this work with Integrated Fire Management and as part of this Roadmap we should continue to champion more funding for Indigenous-led fire prevention

## 7. Land Tenure and Indigenous Peoples' Rights

Secure land tenure for indigenous peoples and local communities (IPLCs) is one of the most cost-effective tools available for forest conservation. Communities with legally recognised land rights consistently demonstrate stronger forest stewardship outcomes. Beyond its conservation value, tenure security is also a foundational enabling condition for the financial instruments outlined in the Forest Finance Roadmap: without it, stable investment environments cannot be created and private capital cannot be effectively deployed.

## Question 2: Levers for Accelerating Implementation

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*What economic, financial, institutional, social or technological levers exist for accelerating implementation?*

The COP30 Roadmap presents a critical opportunity to refresh and improve the institutional scaffolding needed to translate political commitments into measurable results. We identify the following as the most important acceleration levers.

### **A long-term institutional home which supports the other Rio conventions**

The Roadmap must be embedded in a longer-term governance structure, taken forward by successive COP Presidencies and the broader action agenda. A document that expires with the Brazilian Presidency will not drive the sustained change required. It must be positioned as a living framework and a very visible one that continues to guide global action and accountability through to 2030 and beyond. It should also reach across the other Rio conventions for joined up action on tackling the biodiversity crisis and a sustainable food system.

### **Improved access to finance**

The Roadmap should serve as a practical guide for mobilising, aligning, and scaling both public and private funding. This means addressing systemic barriers to accessing forest finance (delivering on the mechanism in bullet 4 question 1), strengthening enabling conditions in recipient countries, and ensuring that financial flows are predictable, accessible, and responsive to national needs. Valuing living nature as an economic asset is critical to unlocking this capital at scale.

### **Clear accountability and monitoring mechanisms**

A stronger reporting framework between 2026 and 2030 is essential to track progress, identify gaps, and enable course correction. Metrics must be both ambitious and operationally realistic.

### **High-level political communication**

A concise one-page summary or visual diagram of key roadmap actions should be designed specifically for Ministers and Heads of State to restate their commitment to 2030 targets and get them back on track. This should clearly articulate what each leader/country is each expected to do, why it matters, and by when, given the enhanced ambition now required to meet the 2030 target.

### **An inclusive and globally representative process**

The Roadmap development process must be genuinely inclusive ensuring that the final product reflects the full diversity of countries and forest contexts, rather than the priorities of any single country or basin. This will be essential to identifying champions who can authentically represent its recommendations to the stakeholders best positioned to act.

London Climate Action Week in June could be a suitable milestone to release a draft Roadmap for discussion, comment and strengthening before it is finalised ahead of COP31.

## **Question 3: Country, Regional and Sector Experiences**

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

Several recent developments offer valuable lessons for what work. Across these examples, three common success factors emerge: strong political leadership, comprehensive scope, and alignment of incentives across stakeholders.

- **Malaysia — MSPO v.2:** The second version of Malaysia's Sustainable Palm Oil standard represents a significant advance in transparency and traceability, offering a model for how producer-country-led certification can raise standards without compromising sovereignty.
- **Brazil — Pará State Cattle Traceability:** The Pará State commitment to traceable cattle supply chains demonstrates how subnational governments can drive supply chain accountability strengthening delivery of national policy, providing a replicable model for other jurisdictions.
- **COP26 Traders Roadmap:** The commitment by 12 of the largest agri-commodity traders to clean up their sourcing has driven meaningful progress among major market actors. However, its exclusion of Bolivia illustrates the critical importance of comprehensive geographic scope: narrow commitments can displace deforestation rather than eliminate it. Future initiatives must be designed from the outset to close displacement risks.
- **Villars Institute and WTO reform:** The Villars Institute has made meaningful inroads at the WTO in the area of harmful subsidy reform, with the support of Director-General Ngozi Okonjo-Iweala. This demonstrates that systemic reform of global trade rules, long considered intractable, is achievable with sustained political commitment.
- **UK-Indonesia FACT Dialogue:** The Forest, Agriculture and Commodity Trade Dialogue established a valuable multilateral forum for aligning standards across producer and consumer countries. Progress in this forum has slowed at the technical level, in the absence of sustained political attention, which underscores the vulnerability of initiatives to changes in political priority. Structures must be designed with accountability mechanisms robust enough to survive shifts in government.

## Question 4: Reflecting Diverse Realities

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*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?*

### **The centrality of indigenous peoples and local communities**

Indigenous peoples and local communities are not merely stakeholders to be consulted they are the most effective forest guardians in the world, and their rights must be at the centre of any credible deforestation strategy. Securing land tenure for IPLCs is both a rights imperative and a conservation outcome: the evidence base consistently shows that formally recognised indigenous territories have lower deforestation rates than other protected or unprotected areas.

Operationally, this means directing technical and financial resources towards tenure formalisation as a priority, empowering IPLCs with tools to monitor and protect their territories, and ensuring that their traditional ecological knowledge informs rather than is overridden by national and international forest governance frameworks. This should include direct access to finance for IPLCs and formal roles in governance and decision-making processes

Land tenure security is also, as noted in Question 1, an enabling condition for virtually all forest finance mechanisms: without it, stable and bankable investment environments cannot be created.

### **Recognising the planetary value of tropical forest basins**

Countries with high forest cover and high deforestation risk carry a disproportionate share of the global burden of forest protection. The current international system does not adequately compensate them for the global ecosystem services they provide. Recognising the Three Basins, Amazon, Congo, and Borneo-Mekong, as planetary infrastructure to restore the Planetary Boundaries will help with the value of this. Out of these three basins, the Congo has by far the least scientific understanding, and the Congo Basin Science Panel work should be prioritised.

## Conclusion

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The Glasgow commitment to halt and reverse deforestation by 2030 remains both the right target and an achievable one, but only with a step change in ambition, coherence, and accountability. The COP30 Roadmap, under the Brazilian Presidency, is one of the most important opportunities to deliver that step change.

The Planetary Guardians stand ready to support the Brazil Presidency in the development and delivery of this ambition roadmap to 2030.