



# WWF Submission on the COP30 Presidency Roadmap for Halting and Reversing Deforestation and Forest Degradation by 2030

31 March 2026

In response to the call for submissions, WWF is pleased to submit our recommendations on the COP30 Presidency Roadmap for halting and reversing deforestation and forest degradation by 2030.

## SUMMARY:

In order to act as an accelerator, the Roadmap should focus on the following four Building Blocks of Action:

- 1. Trade and Supply chains**
- 2. Scale-up Finance and align fiscal Policy**
- 3. Governance, Rights and Law Enforcement**
- 4. Just Transition in the Forest Sector and Smallholder Support**

Alongside the four Building Blocks, principles and objectives that guide the Roadmap should include:

- **Provide direction and focus for international cooperation across key actors** with agreed milestones and actions that accelerate progress to halt and reverse deforestation by 2030.
- **Direct and accelerate national implementation of forest-related climate policies,** finance, and actions, reflected in BTRs in NDCs.

- **Embed justice and equity at its core** – recognizing that forest and ecosystem 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 existing global commitments and initiatives, including the COP30 Action Agenda**, the IPLC Forest Tenure Pledge, the Tropical Forests Forever Facility (TFFF), and Forest Finance<sup>1</sup>.

**The 2030 deadline to halt and reverse deforestation and forest degradation is fast approaching, and the world is failing to meet it.** In 2024, deforestation totaled nearly 8.1 million hectares, generating 4.6 Gt CO<sub>2</sub>e in emissions<sup>2</sup>. Global deforestation<sup>3</sup> and associated emissions<sup>4</sup> have increased, not decreased, since 2015, despite international pledges to halt and reverse forest loss and degradation. Commodity production - particularly beef, soy, timber, palm oil, cocoa, and other agricultural goods - remains the dominant driver of forest loss and other ecosystems<sup>5</sup>. Of the 8.1 million hectares of deforestation in 2024, permanent agriculture accounted for almost 6.8 million – about 84%<sup>6</sup>.

The *Global Tipping Points Report 2025*<sup>7</sup>, launched ahead of COP30 with the engagement of the Brazilian Presidency, warns that the world is approaching dangerous ecological thresholds – including the risk of Amazon dieback – that would have catastrophic consequences for people and nature. It underscores that waiting until tipping points are crossed will be too late, and that systemwide transformation becomes possible when targeted interventions shift incentives and trigger self-reinforcing feedback loops. Deforestation- and conversion-free supply chains (identified as “food and fibre supply chains” in the report) can generate exactly such effects by aligning market access, finance, monitoring, and governance around traceable and ecosystem safe production. The report also underscores the importance of coordinated cross-sectoral action at ‘super leverage points’ to unleash positive tipping cascades.

**WWF urges the COP30 Presidency to maintain a sharp focus on the key leverage points capable of eliminating commodity-driven deforestation and conversion, in its**

1 Priority Actions for DCF Finance; FCLP Finance Roadmap.

2 Forest Declaration Assessment Partners. (2025). Forest Declaration Assessment 2025. Climate Focus (coordinator and editor). Available at [www.forestdeclaration.org](http://www.forestdeclaration.org).

3 Forest Declaration Dashboard. (2026). *Deforestation*. <https://dashboard.forestdeclaration.org/article/conserves-and-restore-forests-and-other-terrestrial-ecosystems/#Deforestation>

4 Forest Declaration Dashboard. (2026). *Deforestation emissions*. <https://dashboard.forestdeclaration.org/article/conserves-and-restore-forests-and-other-terrestrial-ecosystems/#Deforestation-emissions>

5 WRI 2026 <https://www.wri.org/insights/global-ecosystem-conversion-grassland-wetland-savanna-to-agriculture>

6 Forest Declaration Dashboard. (2026). Indicator: Commodity driven deforestation. <https://dashboard.forestdeclaration.org/article/facilitate-sustainable-trade-and-development-policies/#Commodity-driven-deforestation>

7 <https://global-tipping-points.org/>

**Roadmap. WWF also underscores that achieving the 2030 target must be treated as a firm, non-negotiable commitment.**

Note: While this submission keeps a clear focus on commodity-driven deforestation as the most urgent and tractable driver of forest loss within the DCF agenda, we recognize that the same commodity systems also drive significant forest degradation in both tropical and boreal regions through fragmentation, repeated disturbance, and unsustainable extraction. Because deforestation and degradation often stem from the same production pressures, prioritizing the elimination of commodity-driven deforestation will also reduce the underlying incentives that drive degradation, delivering wider ecosystem benefits and strengthening forest resilience across production landscapes.

## 1. Barriers to Halting and Reversing Deforestation and Forest Degradation<sup>8</sup>

Achieving deforestation and conversion free (DCF) supply chains is constrained by deep structural barriers. While many solutions already exist, shifting from short-term, extractive production models to sustainable, resilient landscapes requires systemic change. The main obstacles are not technological; they stem from entrenched resistance to change among global traders, insecure land tenure, misaligned incentives, and fragmented governance – barriers that keep proven solutions from scaling.

**Economic and political barriers.** While market signals are crucial and still lacking, they are not sufficient by themselves to drive the DCF transition. Because global trade in forest risk commodities is concentrated in a few powerful corporations, there is persistent resistance to shifting away from business- as -usual practices – including expansion- into natural forests and ecosystems. In many producer countries, land appropriation remains a strategy for asset building<sup>9</sup>: clearing forest increases land value, strengthens informal claims, and is often rewarded by legal frameworks that favor conversion<sup>10</sup>. Expansion-driven agrarian models<sup>11,12</sup> and entrenched power asymmetries – where dominant agribusiness actors overshadow smallholders and informal economies evade regulation – reinforce the status quo and keep sustainable production at the margins.<sup>13,14</sup>

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8 This submission recommends integrating and concentrating actions related to the proposed Building blocks especially in the following chapters of the Roadmap outline the Brazilian government shared: Part II, 4 (What countries can and should do: Deforestation: Drivers and Solutions); Part III 10 (Fostering International Cooperation and Addressing Regulatory Bottlenecks: Finance, Markets, Partnerships).

9 Global Witness (2025). How land grabbing harms the environment and its defenders. <https://globalwitness.org/en/campaigns/land-and-environmental-defenders/how-land-grabbing-harms-the-environment-and-its-defenders/>

10 Carrero, G. C., Fearnside, P. M., Valle, D. R. D., & De Souza Alves, C. (2020). Deforestation trajectories on a development frontier in the Brazilian Amazon: 35 years of settlement colonization, policy and economic shifts, and land accumulation. *Environmental Management*, 66(6), 966–984. doi.org/10.1007/s00267-020-01354-w

11 IUCN (2019). An Analysis Of Existing Laws On Forest Protection In The Main Soy Producing Countries In Latin America. [https://www.iucn.nl/app/uploads/2021/03/an\\_analysis\\_of\\_existing\\_laws\\_on\\_forest\\_protection\\_la\\_final.pdf](https://www.iucn.nl/app/uploads/2021/03/an_analysis_of_existing_laws_on_forest_protection_la_final.pdf)

12 Bebbington, A. J., Bebbington, D. H., Sauls, L. A., Rogan, J., Agrawal, S., Gamboa, C., Imhof, A., Johnson, K., Rosa, H., Royo, A., Toumbourou, T., & Verdum, R. (2018). Resource extraction and infrastructure threaten forest cover and community rights. *Proceedings of the National Academy of Sciences*, 115(52), 13164–13173. <https://doi.org/10.1073/pnas.1812505115>

14 Forest Declaration Assessment Partners. (2025).

**Regulatory barriers.** Demand side- regulations have accelerated some sectoral and jurisdictional for transparent DCF supplies<sup>15</sup>, yet resistance from major commodity traders and limited market recognition for verified DCF supply persists. The EU Deforestation Regulation has been delayed twice, now to December 2026<sup>16,17</sup>; the UK Environment Act still lacks implementing due diligence- regulations<sup>18</sup>; and China’s emerging interest in DCF traceability has not yet translated into comprehensive import requirements. Most trade agreements also lack binding DCF provisions, enabling “race to- the- bottom” due- diligence- approaches.

**Finance barriers.** Financial flows continue to favour deforestation. In 2024, private financial institutions held USD 8.9 trillion in exposure to high-risk deforestation sectors, and 60% of the most exposed institutions still lack deforestation-policies<sup>19</sup>. Governments spend roughly USD 470 billion annually on harmful agricultural subsidies<sup>20</sup> - over 200 times more than forest aligned international public finance -and such subsidies drive an estimated 14% of global annual deforestation<sup>21</sup>.

**Structural barriers for smallholders.** Smallholder producers remain largely excluded from formal supply chains due to under resourced cooperatives, weak governance structures, and limited access to capital, infrastructure, digital tools, and tenure rights. As a result, they struggle to meet traceability and compliance requirements: only 15.3% of CDP reporting- companies engage smallholders<sup>22</sup>, and just 6.8% offer financial incentives.<sup>23</sup> Without formal tenure, infrastructure, or digital tools, smallholders struggle to access finance<sup>24</sup>, join traceability systems, or provide data<sup>25,26</sup>.

**Governance barriers.** Governance failures perpetuate supply-chain-related deforestation and conversion. Weak governance and widespread illegality remain major drivers of forest loss. Between 61% and 94% of tropical agricultural deforestation is illegal<sup>27</sup>, and environmental crime generates up to USD 281 billion annually<sup>28</sup>. Violence against

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15 [https://www.panda.org/wwf\\_news/?15276466/Time-to-act-Showcasing-incentivizing-and-upscaling-deforestation--and-conversion-free-supply-chains](https://www.panda.org/wwf_news/?15276466/Time-to-act-Showcasing-incentivizing-and-upscaling-deforestation--and-conversion-free-supply-chains)  
16 European Parliament (2025). *Deforestation law: Parliament adopts changes to postpone and simplify measures*. <https://www.europarl.europa.eu/news/en/press-room/20251211PR32168/deforestation-law-parliament-adopts-changes-to-postpone-and-simplify-measures>  
17 Forest Declaration Assessment Partners. (2025).  
18 <https://www.legislation.gov.uk/ukpga/2021/30/notes/division/23/index.htm>

19 Forest Declaration Assessment Partners. (2025).  
20 WWF (2024). "Turning Harm into Opportunity: Repurposing Agricultural Subsidies that Destroy Forests and Non-Forest Natural Ecosystems" (Nelgen, Charré & Pablo Pacheco / WWF)  
21 World Bank (2023). Detox Development: Repurposing Environmentally Harmful Subsidies. <https://doi.org/10.1596/978-1-4648-1916-2>  
22 Forest Declaration Assessment Partners. (2025).  
23 Family Farmers for Climate Action (2025). Feeding the World in a Changing Climate. [https://climatefocus.com/wp-content/uploads/2025/10/FINAL\\_Feeding\\_the\\_world\\_report\\_EN.pdf](https://climatefocus.com/wp-content/uploads/2025/10/FINAL_Feeding_the_world_report_EN.pdf)  
24 Zero Deforestation Hub (2025). Indonesia & Malaysia: Traders' EUDR Imperative for Market Access. [https://zerodeforestationhub.eu/wp-content/uploads/2025/08/Private-Sector-Indonesia-Malaysia\\_05082025-1.pdf](https://zerodeforestationhub.eu/wp-content/uploads/2025/08/Private-Sector-Indonesia-Malaysia_05082025-1.pdf)  
25 Regional Community Forestry Training Center for Asia and the Pacific (RECOFTC) (2025). Background study: Empowering smallholders to comply with regulations targeting forest risk commodities <https://www.recoftc.org/sites/default/files/publication/documents/2025-10/empowering-smallholders-to-comply-with-regulations-targeting-forest-risk-commodities.pdf>  
26 Family Farmers for Climate Action (2025). Feeding the World in a Changing Climate. [https://climatefocus.com/wp-content/uploads/2025/10/FINAL\\_Feeding\\_the\\_world\\_report\\_EN.pdf](https://climatefocus.com/wp-content/uploads/2025/10/FINAL_Feeding_the_world_report_EN.pdf)  
27 Forest Trends (2021). Illicit Harvest, Complicit Goods: The State of Illegal Deforestation for Agriculture [https://www.forest-trends.org/wp-content/uploads/2021/05/Illicit-Harvest-Complicit-Goods\\_rev.pdf](https://www.forest-trends.org/wp-content/uploads/2021/05/Illicit-Harvest-Complicit-Goods_rev.pdf)  
28 Financial Action Task Force (FATF) (2021). Money Laundering from Environmental Crime. <https://www.fatf-gafi.org/en/publications/Environmentalcrime/Money-laundering-from-environmental-crime.html>

environmental defenders is pervasive, with 62% of killings linked to land conflicts<sup>29</sup>. Lack of tenure security creates disincentives for land stewardship and increases the likelihood of deforestation as a short-term strategy, particularly in frontier areas where overlapping claims, incomplete cadasters, and speculative land grabbing are common. Only 13% of customary lands in tropical forests are formally recognized<sup>30</sup>, leaving communities vulnerable and incentivizing short-term clearing as a means of securing claims. These ambiguities also undermine verification, exclude smallholders and Indigenous Peoples, and reinforce power imbalances favoring large agribusiness actors<sup>31</sup>.

## 2. Levers for Halting and Reversing Deforestation and Forest Degradation

The Roadmap's core contribution must be the acceleration of solutions, not a further mapping of problems. The following four building blocks organize known, proven solutions into an actionable framework, prioritizing measures where significant readiness and momentum already exist. For each measure, the Roadmap should build explicitly on what has already been agreed, including at COP30, rather than starting from scratch.

We suggest organizing the Roadmap around the four following mutually reinforcing building blocks of action that address the identified barriers laid out above:

- 1. Trade and Supply Chains**
- 2. Scale-up Finance and align fiscal Policy**
- 3. Governance, Land Tenure and Law Enforcement**
- 4. Just transition in the Forest Sector and Smallholder Support**

### Building Block 1: Trade and Supply Chains

Momentum on trade and supply chain governance is growing: demand side regulation is advancing, traceability tools are becoming more viable, and jurisdictional monitoring and traceability approaches now show proof of concept.

#### 1.1. Demand-Side Due Diligence Regulation & Traceability

The Roadmap should establish a clear expectation that all major consuming economies move toward enforceable due diligence frameworks, building from existing initiatives such as the Glasgow Leaders' Declaration on Forests and Land Use. Full supply chain traceability is already operational in major commodity supply chains as case studies below highlight. The Roadmap needs to drive the scaling of existing and emerging traceability solutions through

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<sup>29</sup> Global Witness, *Roots of Resistance* (2025)

<sup>30</sup> Forest Declaration Assessment Partners. (2025).

<sup>31</sup> Schilling-Vacaflor & Gustafsson (2024) – "Integrating human rights in the sustainability governance of global supply chains: Exploring the deforestation–land tenure nexus" *Environmental Science & Policy* (ScienceDirect) <https://doi.org/10.1016/j.envsci.2024.103690>

digital public infrastructure developed through technical and commercial collaboration among governments, companies, and producer representatives.

#### **Case studies:**

- In **Argentina**, the [VISEC](#) traceability platform facilitated the shipment of 46,000 tons of deforestation-free **soymeal** to Europe in direct response to EUDR compliance requirements.
- In December 2024, [SD Guthrie \(SimeDarby\) reported full compliance](#) with the EU Deforestation Regulation (EUDR) in a smallholder inclusive supply chain by building on top of direct RSPO segregated certified sourcing in **Papua New Guinea** and **Solomon Islands**.
- In **Brazil**, the [Minas Gerais' Selo Verde platform](#) demonstrates how state level digital systems can integrate environmental data, automate compliance checks, and provide transparent traceability across agricultural supply chains.
- In **Australia**, the [Australia's Vegetation Monitoring & Assessment Program \(VMAP\)](#) provides high resolution, nationally consistent data on forest extent, forest loss, woody vegetation cover, and related carbon emissions, enabling landholders and companies to conduct credible deforestation free assessments.
- In **Brazil**, the [Pará Sustainable Cattle Program](#) is building full traceability systems for cattle supply chains, while the [Soy on Track](#) program provides a platform for **soy** producers, traders, and other supply chain actors to access tools, data, and technical information to comply with the Amazon Soy Moratorium and Pará's Green Grain Protocol.
- **Côte d'Ivoire's** [Coffee-Cocoa Board](#) has registered over 700,000 farmers and geolocated more than 3.2 million hectares of cocoa farms.
- **Ghana's** [national Cocoa Management System](#) uses farm mapping, producer training and digital traceability to help the cocoa sector meet emerging deforestation-free requirements and has improved transparency across nearly 800,000 smallholder farmers.
- **Tanzania's** [EUDR preparedness check](#) shows a solid traceability base in the **coffee** sector.

## **1.2. Utilize multi-stakeholder collaborative approaches**

Multi-stakeholder jurisdictional and landscape-level transparency and traceability approaches are demonstrating proof of concept, with several jurisdictions showing promising results. Efforts to address degradation, conversion and deforestation will benefit

tremendously from cooperation and partnerships between various actor groups. Multi-stakeholder initiatives include public-private partnerships that address forest and commodity, supply chain traceability, disclosure data and market access challenges for alignment, collaboration, and governance across sectors, levels, and geographies.

#### **Case studies:**

- In [Jalisco, Mexico](#) a landscape-level partnership to implement silvopastoral systems and other good livestock practices, allows local cattle producers to sell deforestation-free beef on the local market.
- The [Sintang Landscape Initiative](#) in the Sintang district of **Indonesia** has strengthening smallholder inclusion and is building local capacity to produce sustainable oil palm by strengthening protection and management of high-conservation value (HCV) areas.
- [The EU Sustainable Cocoa Initiative](#) in **Côte d'Ivoire, Ghana, and Cameroon** brings together actors from across the **cocoa supply chain** through Cocoa Talks, fostering traceability and actively engaging smallholders in the transition to sustainable, deforestation-free production.
- In **Cameroon**, [FAO's COCAFORI initiative](#), together with the EU-funded Sustainable **Cocoa** Programme (SCP), provides stakeholders with advanced land cover, forest maps and detailed cocoa maps. These tools enable smallholders to verify compliance with EUDR requirements, strengthen resilience, and access EU markets, while supporting better-informed decision-making and landscape management.
- See also [Core Criteria for mature landscape initiatives](#) (ISEAL): Twenty leading landscape practitioner organisations have come together to develop these core criteria which present both a roadmap for new and existing landscape initiatives to improve their effectiveness and a means by which to assess the maturity of these initiatives for different purposes or use cases.

### **1.3. Embedding DCF Standards in Trade Agreements**

Trade agreements must start making verified DCF compliance a condition for market access. Fragmented, uncoordinated global trade governance undermines even well-intentioned regulatory action and can drive production leakage from forest ecosystems into other areas of high biodiversity, such as grasslands and savannahs. Trade negotiations should build on existing cooperation frameworks including the FACT Dialogue, the

International Consortium for Combating Wildlife Crime, regional Wildlife Enforcement Networks (ASEAN-WEN, SAWEN, SUDWEN), and multi-stakeholder platforms including the Nature Crime Alliance and Wildlife Trafficking Alliance.

At COP30, the Brazilian COP Presidency launched the [Integrated Forum on Climate Change and Trade \(IFCCT\)](#). The Roadmap should drive integration of work on traceability of DCF supply chains, revisiting agricultural incentives and financing transition into the workplan of the IFCCT.

## Building Block 2: Scale-up finance and align fiscal policy and oversight with forest goals

Transforming the financial architecture underpinning global agricultural and forestry production is a prerequisite for achieving the 2030 goals. The Roadmap should elevate areas identified in the Forest and Climate Leaders Partnership's (FCLP) [Forest Finance Roadmap](#) and under the [2030 Forest Vision: Priority Actions for Deforestation- and Conversion-free Finance – Aligning private financial flows with global forest goals](#). Based on these actions, a [Plan for Accelerated Solutions](#) has been developed under the COP30 Action Agenda which could serve as a strong foundation for action under the Roadmap.

### 2.1. Scaling up public and blended finance

The Roadmap must include green finance mechanisms that can provide financial flows of sufficient scale and magnitude to incentivize a rapid transition to nature positive production as well as measures to expand direct finance access for smallholders and communities. International pledges – such as the expanded USD 1.8 billion [Forest Tenure Pledge 2.0](#) announced ahead of COP30<sup>32</sup> – help deliver finance for tenure rights and forest guardianship, yet investment still falls far short of needs<sup>33</sup>.

- The [Mesoamerican Territorial Fund](#), [Nusantara Fund \(Indonesia\)](#), and [Shandia Platform](#) are examples of IPLC-led funding mechanisms that channel finance directly to communities for territorial governance and forest stewardship.

Blended finance models, combining public concessional capital with private investment, must be scaled and there are many examples that the Roadmap can help catalyse.

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<sup>32</sup> Conservation International (2025). Conservation International Welcomes New Global Funding Commitments and Announces Initiative to Advance Indigenous and Local Leadership in Climate and Biodiversity <https://www.conservation.org/press/conservation-international-welcomes-new-global-funding-commitments-and-announces-initiative-to-advance-indigenous-and-local-leadership-in-climate-and-biodiversity>

<sup>33</sup> RRI (2024). State of Funding for Tenure Rights and Forest Guardianship <https://rightsandresources.org/publication/state-of-funding-for-tenure-rights-and-forest-guardianship/>

### Case studies:

- The **Tropical Forests Forever Facility (TFFF)**, if fully capitalized, could become the largest forest fund ever, and the largest source of direct finance for IPs and LCs. Raising sovereign investments to a minimum of \$10b is critical for success.
- **Jurisdictional REDD+** offers another important pathway but more readiness investment and technical assistance is required.<sup>34</sup>
- Blended finance models such as [RAIZ](#), the [Climate-Compatible Agriculture Transition](#) (CCAT) and the [Ecoinvest](#) facility provide patient capital that enables farmers to transition to DCF and resilient production models.
- [The Living Amazon Mechanism](#) and [Brazil's Sovereign Sustainable Bonds](#) demonstrate innovative approaches to mobilizing and channel blended finance to national forest priorities, including smallholder-inclusive restoration and sustainable production programmes

## 2.2 Aligning and scaling corporate finance in DCF production landscapes

The Roadmap must catalyse initiatives that drive corporate investment beyond individual supply chains and scale finance into their supply sheds through jurisdictional and landscape level approaches, helping address persistent barriers that governments and dominant supply chain actors have not yet resolved. There is critical [need for finance in high-risk regions](#), such as the Cerrado.

### Case studies:

- The [Rimba Collective](#) is a long term, US\$1 billion private sector mechanism that channels finance from major consumer goods companies – including Nestlé, PepsiCo, Procter & Gamble, and Unilever – into largescale forest conservation and restoration across **Southeast Asia**.
- Three UK food retailers, Sainsbury's, Tesco, and Waitrose [have directly in more sustainable soy production by incentivising farmers](#) to protect native vegetation in high-risk regions of the **Cerrado**, including Ipiranga do Norte **in Mato Grosso and Mineiros** in the State of Goiás in Brazil.
- [Forests Forward](#) mobilises private corporate funding from **26 companies across nine sectors** supporting forest landscape programmes worldwide that go beyond responsible sourcing and contribute to producer transitions.

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<sup>34</sup> Winrock: *Scaling Forest Finance: Jurisdictional REDD+ Technical Assistance and Capacity Strengthening*

## 2.3 Regulate Financial Institutions & Embed Deforestation Risk

Potentially the most powerful near-term measure to shift private capital away from deforestation is regulatory. The [Forest 500 Finance Assessment](#) identifies only a small minority of global financial institutions as having robust safeguards against financing global deforestation. Financial supervisors must mandate that financial institutions assess, manage, and disclose the deforestation and conversion risks in their portfolios<sup>35</sup> and integrate DCF criteria into their lending and investment considerations. Central banks and regulators should integrate deforestation risk into stress testing, risk management frameworks, and governance requirements. Specifically, central banks should assess and manage deforestation related risk in their monetary and non-monetary policy portfolios. The Roadmap should expand on and strengthen initiatives such as the [Network for Greening the Financial System \(NGFS\)](#) and the [Taskforce on Nature-related Financial Disclosures \(TNFD\)](#)

### Case studies:

- [Banco Central do Brasil](#) (BCB) established a rural credit policy through which subsidized rural credit is linked to compliance with environmental regulations and land tenure laws.
- [WWF's Greening Financial Regulation Initiative](#) targets central banks, supervisors, and regulators, making the case that deforestation and ecosystem conversion pose material macro financial and price stability risks, while offering policy guidance and practical tools to embed deforestation risk into monetary policy, prudential supervision, and financial regulation.
- The [Superintendencia Financiera de Colombia](#) has issued new instructions for supervised financial institutions to assess and manage environmental risks, including risks arising from practices associated with deforestation

## 2.3 Repurpose Harmful Agricultural Subsidies

Shifting just 10% of the most harmful agricultural subsidies toward climate-smart approaches could generate USD 2.4 trillion in benefits by 2040, cut emissions by 40%, and restore 105 million hectares of natural habitat<sup>36</sup>. The Roadmap offers a critical opportunity to catalyse global action on identifying, reforming, and repurposing subsidies that drive forest loss, fully aligned with obligations under Target 18 of the Kunming–Montreal Global Biodiversity Framework. Building on ongoing work under the CBD, including initiatives such as [BIOFIN](#) /

35 Saphira, P. et al. (2024). Addressing the Giants: Integrating Nature in Regulations for Systemically Important Banks. WWF & CDP. WWF's DCF guide for central banks and financial supervisors: <https://wwf.panda.org/?11656966/Central-banks-regulators-and-supervisors-urged-to-intervene-in-main-drivers-of-nature-loss-and-climate-change-alongside-governments><https://wwf.es.awsassets.panda.org/downloads/wwf-addressing-the-giants-reportv4.pdf>

36 World Bank. (2025). Repurposing Agricultural Support: 2025 Policy Compendium; original modeling by World Bank/IFPRI.

[GEF](#), [IISD](#), the [Just Rural Transition Group](#), this agenda must be elevated to the highest political level, with a dedicated **coalition of Champions** mobilized to drive ambitious, coordinated reforms.

### Building Block 3: Governance, Land Rights and Law Enforcement

No supply chain intervention will deliver lasting results on land where rights are contested, absent, or unenforced. The [COP30 Intergovernmental Land Tenure Commitment](#) (ILTC) represents a critical opportunity that the Roadmap must operationalize. Strengthened tenure security combats land grabbing, conflict and policy failure, and is a cost-effective mechanism for blocking commodity-driven conversion<sup>37</sup>. Legally titling Indigenous lands leads to approximately 66% lower deforestation at territorial borders<sup>38</sup>.

#### 3.1. Advance Land Tenure Recognition at Scale

By aligning political commitments (ILTC) with dedicated finance (e.g. Land Tenure Pledge 2.0), the Roadmap should bundle efforts to secure land rights. Areas of operationalization should include the acceleration of tenure security by supporting rapid demarcation, cadaster completion, legal titling, while directing pledge of finance to community-led mapping, monitoring, and rights enforcement. The implementation needs to be accompanied by setting specific, time-bound national targets for recognizing collective land rights; providing transparent data on progress and gaps; and integrating tenure commitments into national implementation of the Rio Conventions (NDCs, NBSAPs).

#### 3.2. Strengthen Governance, Law Enforcement & Anti-Corruption and Environmental Defenders

To counter the majority of commercial commodity-driven deforestation which stems from illegal activities, the Roadmap should promote and operationalize targeted actions in law enforcement in the land use sector and channel funding to judicial, investigatory, and anti-corruption bodies. Special attention should be dedicated to conflict-affected or remote landscapes where organized crime actively exploits governance vacuums<sup>39</sup> as well as cross-border law enforcement cooperation and intelligence-sharing to disrupt transnational criminal networks who profit from illegal clearing and trade in timber, wildlife, and other associated products. In this context, the Roadmap should strengthen cooperation through existing enforcement networks including the [International Consortium for Combating Wildlife Crime and regional Wildlife Enforcement Networks](#). The Roadmap should also help ensure that local and national duty bearers protect civic space and uphold the human rights of environmental defenders, recognizing their essential role in safeguarding forests.

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<sup>37</sup> Baragwanath & Bayi, (2020).

<sup>38</sup> Baragwanath & Bayi, (2020). The Proceedings of the National Academy of Sciences (PNAS): Collective property rights reduce deforestation in the Brazilian Amazon. <https://www.pnas.org/doi/full/10.1073/pnas.1917874117>

<sup>39</sup> WRI (2025). Nature Crime Fuels Deforestation in the Amazon. <https://www.wri.org/insights/nature-crime-amazon-deforestation>

## Case studies:

- Coordinated policy action – including moratoria on new palm oil concessions improved fire management, and enhanced law enforcement – drove a sharp decline in **Indonesia**'s deforestation rate from 2017-21<sup>40</sup>.
- The [Amazon Soy Moratorium, a voluntary initiative](#), played a crucial role in driving deforestation down by up to 70% in monitored areas but is now at risk as Brazil's major soy traders have announced their withdrawal, threatening to unravel one of the most effective forest protection measures ever established.
- The [collaboration between WWF, INTERPOL, and Germany's Federal Environment Ministry](#) strengthens cross border enforcement against illegal logging, land clearing, and other environmental crimes.
- The [Escazú Agreement](#) - Latin America and the Caribbean's first legally binding treaty on environmental rights - strengthens access to information, public participation, justice, and protection for environmental defenders, helping curb illegal deforestation and improve accountability across high-risk landscapes.

## Building Block 4: Support Smallholder Livelihoods and enable a just Transition in the Forest Sector

### 4.1. Empower Smallholders in Commodity Supply Chains

Because smallholders steward vast landscapes, face the highest compliance burdens, and are most vulnerable to exclusion, placing equity and a just transition at the centre of the Roadmap is essential to prevent leakage, ensure legality and traceability, protect livelihoods, and make deforestation free- supply chains both effective and enduring<sup>41</sup>. Inclusive DCF supply chains must address both structural barriers to smallholder participation (e.g. tenure insecurity, lack of working capital, poor infrastructure, limited connectivity and lack of technical support) and compliance requirements that impose costs directly onto producers. Key activities that should be promoted include technical assistance to support the uptake of a digital public infrastructure that make traceability and data systems accessible at scale<sup>42</sup>, national assurance schemes that reduce duplication and costs and enhance market access.

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40 Angelsen, Dermawan & Ladewig (2024). Explaining the recent reduction of Indonesia's deforestation. Norwegian University of Life Sciences. [https://main-bvxea6i-kdsvgmpf4iwws.eu-5.platformsh.site/sites/default/files/2025-02/CLTS\\_Report\\_01\\_25\\_full\\_pg.pdf](https://main-bvxea6i-kdsvgmpf4iwws.eu-5.platformsh.site/sites/default/files/2025-02/CLTS_Report_01_25_full_pg.pdf)

41 Unlocking opportunities for smallholders through the EU deforestation regulation (EUDR), WWF 2025

42 World Bank Group (2025). Digital Public Infrastructure and Development.

### Case studies:

- [National initiatives](#) including the **Indonesian National Dashboard for Commodities** (INDC) and [Malaysia's Sawit Intelligent Management System](#) (SIMS) and e-MSPO are exploring national traceability and monitoring systems to ensure EUDR compliance does not exclude smallholders from supply chains.
- WWF **Indonesia** developed the [Hamurni platform](#) designed to improve the integration of smallholders into the value chain.

## 4.2. Invest in Alternative Livelihoods & Address the Drivers of Subsistence Smallholders

To make DCF production viable for smallholders, the Roadmap should target and identify and scale up incentive programs with accessible finance and diversified livelihood options<sup>43</sup> including agroforestry, ecotourism, timber and nontimber forest -products, and strengthened value chains.

The Roadmap process should closely coordinate and align with relevant activities under the **Global Food Systems Change Agenda**, to connect agendas and initiatives that empower smallholders, reward forest positive practices, and catalyse a shift toward sustainable, and regenerative agriculture.

### Case studies:

- **Costa Rica's Payment for Ecosystem Services** scheme demonstrates how country level incentive programs can drive forest positive cocoa production by -identifying- priority conservation areas and engaging farmers through voluntary agreements that reward ecosystem protection<sup>44</sup>.
- In **southern Cameroon**, strengthened cooperative governance and technical assistance under [WWF's CANOPE](#) initiative are helping cocoa farmers improve management, boost productivity, and transition toward more sustainable, forest friendly cocoa production.
- Through the [MoMo4C programme](#), WWF is supporting cocoa cooperatives in **Cameroon's TRIDOM landscape** by strengthening business capacity and brokering offtake agreements with premium buyers.

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<sup>43</sup> See also Ding et al, Repurposing agricultural subsidies to restore degraded farmland and grow rural prosperity, WRI 2021.  
<sup>44</sup> From Past to Future: How Business-as-Usual Cocoa Drives Forest Loss and What We Can Do, WWF 2026

### 3. Tracking Progress of the COP30 Roadmap: National Implementation and Enhanced Climate Ambition

The Roadmap should function as an implementation engine for forests, translating the COP28 GST Decision into concrete, forest- and agriculture-sector-specific commitments at the national level. The current baseline is stark: **only one updated NDC explicitly commits to zero deforestation by 2030, and 85% of submitted BTRs do not report on deforestation at all**<sup>45</sup>. The levers identified in the Roadmap must ultimately be reflected in national implementation plans, sectoral strategies, and NDC targets that are specific, time-bound, and transparently reported. The Roadmap should therefore be understood not as a parallel process to national climate and biodiversity planning, but as a mechanism that closes the gap between global forest commitments and domestic action – with the next NDCs as the deadline for correction of this glaring gap.

By aligning forest targets in NDCs with the Roadmap, the NDCs and BTRs can be used as a common mechanism to monitor progress and report on climate-related forest action in a unified manner. Existing tools like the Food Forward [NDCs & NBSAPs toolkit](#) provide comprehensive guidance on such policy measures in agriculture and food systems and indicators to monitor progress that can support the implementation and monitoring progress of the Roadmap.

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<sup>45</sup> Bakhtary et al. (2025). Closing The Forest Ambition Gap: A Review of Nationally Determined Contributions and Biennial Transparency Reports. <https://climatefocus.com/publications/closing-the-forest-ambition-gap/>

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