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**Submission to the Subsidiary Body for Scientific and Technological Advice on:
Methodological guidance for activities relating to reducing emissions from deforestation and forest degradation and the role of conservation, sustainable management of forests and enhancement of forest carbon stocks in developing countries**

6 September 2011

Rapid development of national REDD+ frameworks has begun under several bilateral and multilateral initiatives. However, without strong methodological guidance from the UNFCCC, there is a danger that a patchwork of inconsistent, non-comparable national mechanisms will preclude the effectiveness of REDD+ as a global mitigation effort. It is therefore critical that the UNFCCC develop the necessary guidance in the very near term.

Below we provide input, according to the general guidance provided by SBSTA in FCCC/SBSTA/2011/L.14, to be considered in development of draft text for COP 17.

Guidance on systems for providing information on how safeguards are addressed and respected

a) Characteristics

- Information should be collected and reported in a transparent and comparable manner.
- Information provided should be consistent over time to enable tracking of ongoing application of safeguards. It should be complete and comprehensive, covering all actions undertaken to address both social and environmental safeguards.
- Accuracy of the information should be maximized through independent verification and stakeholder participation.
- The system should ensure full and effective participation of all relevant stakeholders, including indigenous peoples and local communities. It should also consider gender equity and engage non-governmental organisations and experts.

b) Design

- The information system should be harmonized with other related monitoring systems, including forest monitoring.
- The design of the system, including determination of the types of information to be collected and relevant indicators, should be undertaken with the full and effective participation of stakeholders, including indigenous peoples and local communities.
- The system should make use of national and sub-national institutions responsible for implementing REDD+; outputs of the information collection and review processes should be fed back into those institutions.
- The system should include incentives for continuously moving towards higher quality information, and a process for independent review and verification of the information should be provided.

c) Provision of information

Guidance is needed on both 1) what information should be published and 2) how information should be provided.

1) Published information should include:

- An assessment of how the safeguards are addressed and respected;
- Information on the action(s) undertaken to address and respect each safeguard;
- Information to track outcomes related to the safeguards;
- Information to assess the reliability of those data, such as:

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- the type of information;
 - the source of information (e.g., collected remotely, through field research, etc), at least in general terms;
 - steps taken to verify the information or ensure its accuracy; and
 - any additional underlying information that documents these steps that have been taken.
- Actions taken in response to the outcomes of information assessment.
- 2) With regard to *how* information should be provided:
- Information must be easily accessible and presented in a way that meets the needs of various stakeholders (in-country stakeholders, donors, etc).
 - Information must be provided at regular intervals, potentially in coordination with related forest monitoring systems; the frequency of reporting must support tracking of how safeguards are implemented over time.
 - A common template should be provided to allow easy assessment. Standardized information should be complemented with more detailed information not contained in the common template.
 - The information should be made publicly available.
- d) *Potential barriers, including barriers, if any, to providing information, on addressing and respecting safeguards*
- e) *Other relevant issues*

Guidance for modalities relating to forest reference levels and reference emissions levels

- a) *Scope and/or purpose*
- The **purpose** of modalities is to provide guidance on reference emissions levels (REs) and reference levels (RLs). These provide a benchmark for measuring and tracking progress towards the REDD+ goal to collectively aim to slow, halt, and reverse forest cover and carbon loss. Consistent and transparent REs/RLs provide a basis for environmental integrity, maintaining confidence in the REDD+ system.
 - The **scope** should include guidance on how to promote broad participation while ensuring environmental integrity and creating an effective, efficient, and equitable framework for assessing emission reductions.
 - While REs/RLs will have implications regarding eligibility for and levels of financial compensation, the relationship between REs/RLs and compensation is a policy discussion that should be addressed in the LCA.
- b) *Characteristics, including elements listed in paragraph 1 of appendix I to decision 1/CP.16*
- **Environmental integrity** – REs/RLs should aim to achieve the REDD+ outcomes from 1/CP.16¹; result in additional emissions reductions than would have occurred without the mechanism; and ensure that REDD+ is significantly contributing to global efforts to address climate change.
 - **Access** – REDD+ REs/RLs should encourage participation of all forested developing countries. Because REs/RLs are likely to have a relationship with incentives received at

¹ *Affirming* that, in the context of the provision of adequate and predictable support to developing country Parties, Parties should collectively aim to slow, halt and reverse forest cover and carbon loss, according to national circumstances, consistent with the ultimate objective of the Convention, as stated in Article 2.

the national level, ensuring that guidance is applicable to all forested developing countries will be critical to avoiding leakage and achieving REDD+ goals.

- **Rigorous and efficient** – RELs/RLs should be rigorous, but the process of setting them should be efficient and cost effective, and should minimize potential for perverse incentives. The range of national circumstances that can be considered in the calculation of RELs/RLs should be defined by the COP, and the modalities for making adjustments on the basis of these circumstances should be prescribed by the COP.
- **Objectivity** – Development of RELs/RLs should be based on reviewed, accepted, and publicly available² data and should limit opportunities for perverse incentives.

c) *Guidance for the construction*

- **Empirical basis** – RELs/RLs should be based on average historical emissions, adjusting for narrowly pre-defined national circumstances that still ensure the environmental integrity of the RELs/RLs (4/CP.15).³
- **Transparency** – Methodologies, data, calculations, models and assumptions for developing RELs/RLs should be transparent and made publicly available (4/CP.15)⁴.
- **Independence** – Methodologies, data, calculations, models and assumptions should be reviewed independently against COP guidelines to ensure data and methodological quality.
- **Comparability** – Modalities for setting RELs/RLs should be comparable among all countries. While flexibility may be important to address narrowly pre-defined national circumstances, it must be balanced with robust methodological guidance to ensure environmental integrity and comparability.
- **Quantify impact of adjustments** – Given that Parties are considering adjusting for national circumstances, countries should be required to: quantify the impact of these adjustments⁵ compared to a historical REL/RL, quantify the impact on achieving the REDD+ goal, and justify such adjustments.

d) *Process for communication*

- The UNFCCC must encourage consistency and comparability in communication of RELs/RLs and require disclosure and transparency of the reference level approach for the benefit of all stakeholders. Methodologies, data, calculations, models, and assumptions used in developing reference levels should be should be freely and openly posted online.
- These methodologies, data, calculations, models and assumptions should be independently reviewed against agreed upon guidelines for methodological and data quality before they are accepted by the COP.
- The COP should be able to periodically request technical adjustments and/or updates to reference levels based on agreed upon criteria.

e) *Other relevant issues*

² If previously public, reviewed, and accepted data aren't available, new data should first be subject to public review and acceptance.

³ Recognizes that developing country Parties in establishing forest reference emission levels and forest reference levels should do so transparently taking into account historic data, and adjust for national circumstances, in accordance with relevant decisions of the Conference of the Parties.

⁴ *Ibid.*

⁵ Adjustments must be based on narrowly pre-defined national circumstances.

Guidance on modalities for measuring, reporting and verifying, as referred to in appendix II to decision 1/CP.16

- a) *Characteristics, including elements listed in paragraph 1 of appendix I to decision 1/CP.16*
- The most recent IPCC guidelines and good practice guidance should be the basis of forest carbon monitoring and MRV.
 - Emerging and proven technological and methodological developments that increase accuracy and efficiency should be taken into account.
 - Monitoring and MRV systems should be transparent and promote participatory processes.
 - The output from MRV systems should enable assessment of progress towards the REDD+ outcome agreed in 1/CP.16 and to national-level goals/targets.⁶
 - The temporal and spatial resolution of monitoring and MRV should be sufficient to capture the relevant anthropogenic impacts on forests.
- b) *Elements*
- Monitoring and MRV for REDD+ should integrate and coordinate field-based forest carbon inventories and remotely-sensed land cover change analyses and other datasets.
 - Forest monitoring systems should augment field-based carbon inventories, and should ultimately be accomplished using wall-to-wall mapping at the national scale.
 - Frameworks should be able to track changes to and from forest land in a spatially-explicit manner (IPCC Approach 3).⁷
 - Inputs from participatory forest monitoring should be incorporated systematically into monitoring and MRV systems.
 - Guidance on how to measure, monitor, and report on the displacement of emissions within countries' national boundaries for countries utilizing interim sub-national systems should be provided.
 - REDD+ monitoring and MRV should be compatible with potential future efforts to measure and monitor the impacts of anthropogenic activities on other land uses. All countries should aim to ultimately conduct measuring and monitoring at the scale/s consistent with the range of REDD+-relevant anthropogenic processes (e.g., different scales may be needed to accurately monitor and MRV emissions from clear cutting versus from selective logging).
- c) *Process for reporting*
- **IPCC good practice guidance and guidelines** – Reporting of MRV outputs should follow, at minimum, the most recent IPCC good practice guidance.
 - **Transparency** – Frameworks, methodologies, and data must be transparent and conducive to verification by external reviewers.
 - **Submission and review** – Data should be submitted regularly and be available to the public
- d) *Other relevant issues*
- **Coordination with other aspects of REDD+** – The design of MRV systems should be coordinated with RELs/RLs, information systems for safeguards, and any existing forest and/or land-based measuring and monitoring initiatives.

⁶ See footnote 1 above

⁷ Approach 3 requires spatially explicit observations of land use and land-use change. The data may be obtained either by a sampling of geographically located points, a complete tally (wall-to-wall mapping), or a combination of the two (IPCC Good Practice Guidance for LULUCF).

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- **Uncertainty** – More explicit guidance is needed on assessing overall uncertainty in emissions estimates. Existing guidance focuses on quantifying uncertainty associated with individual datasets. There is insufficient guidance available on assessing overall uncertainty.

Please refer to the attached **Recommendations for forest carbon measuring, monitoring, reporting, and verifying guidance for REDD+** from May 2011, for additional content on forest carbon monitoring and MRV.

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