

Green Climate Fund Call for Public Inputs REDD+ Results Based Payments

Submission on Behalf of the Asia Pacific Rainforest Partnership Private Sector Roundtable

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About the APRP PSR: The Asia-Pacific Rainforest Partnership promotes global action and provides a platform to progress activities that reduce emissions from deforestation and forest degradation in the Asia-Pacific region. The Partnership builds on the momentum of the [Paris Agreement](#), which highlights the important contribution sustainable forest and landscape management will make in achieving global emissions reduction and adaptation goals. Alongside the [United Nations Sustainable Development Goals](#), the Paris Agreement reinforces the value of regional multi-sector partnerships between governments, the private sector and civil society in reducing emissions. The Asia-Pacific Rainforest Partnership leverages these existing commitments to deliver practical forest conservation. The Private Sector Roundtable was launched at the Global Landscapes Forum during COP21 in Paris in December 2015, to provide input on public policy based on private sector experience and perspectives, and support the realization of the overall goals of the partnership. More information is available at <https://www.asiapacificrainforestpartnership.org/private-sector-roundtable/>

Technical element 1: Scale of implementation

1.1: What scale of implementation (national, subnational, nested) should be considered for the RFP?

Given the challenges that REDD+ implementation has faced to date due to the lack of a global carbon market, it's important not to limit potential implementation and progress further by restricting implementation to the national level. The APRP PSR supports a nested approach which would allow for all three levels of implementation - national, subnational, and community/project based- in order to accommodate the diversity of initiatives which are already underway while achieving the principles of environmental integrity called for in the Paris Agreement. This is by far the most inclusive approach which would allow for participation by subnational governments, indigenous peoples, communities, and the private sector. It is frequently stated that public finance for REDD+ activities will not be enough to achieve the targets set in Paris, so all options to encourage finance and engagement from other sectors should be encouraged, not hampered. In many countries the private sector is leading the way in the implementation of REDD+ projects and every effort should be made to bring these existing approaches into national and sub-national approaches to build on the significant experience already developed and to serve as a signal for other private sector institutions interested in engaging on REDD+ that there is not a risk of stranded assets.

1.2 Should the GCF provide detailed guidance for defining the scale of eligible proposals?

We would recommend building on already existing initiatives and efforts underway that provide guidance on the scale of eligible proposals such as:

- [Global Forest Observation Initiative REDD Compass](#)
- [The Verified Carbon Standard \(VCS\) Jurisdictional and Nested REDD Initiative](#)

If detailed guidance is provided by the GCF it should be in line with these other initiatives and not create something new and additional. Since most countries to date have been taking a gradual or step-wise approach beginning with the sub-national level it would be wise to build on the experience developed at sub-national levels in developing further guidance and feeding into the development of national level FREL.

Technical element 2: Forest reference emissions levels (FREL/forest reference levels (FRL)

2.1 How should the GCF take into account the different approaches used for defining FREL/FRL and translated into verified REDD+ results?

First and foremost the GCF should allow for the diversity of approaches being used to account for the very diverse national circumstances. To date, only one country has submitted a FREL under the UNFCCC, illustrating the fact that this is still very much an emerging area. However, there is also a need to ensure that approaches are using robust data and peer reviewed for quality. For example, in order to predict future trends in forest related emissions, robust data is required, which is often lacking in most developing countries, so any future projections in these cases would be tenuous. At this stage, for many developing countries using a historical average is the most feasible near term option.

2.2: Is there a need for additional GCF-specific criteria for FREL/FRL and MRV? What type?

The GCF should not create additional criteria for an already complicated space and should base criteria on existing approaches including assessing the availability of information on:

- Deforestation rate of the last 10 years
- Population density and growth
- Forest area
- Economic growth
- Commodity prices
- Governance variables, including roles and collaboration among various stakeholders

2.3 How should the GCF take into account the results of the analysis of the REDD+ technical annex? What process and review criteria, if any, in order to make funding decisions?

The GCF should use the areas outlined in the Annex of 14/CP.19 as a checklist in reviewing funding proposals to ensure that the information outlined therein and the methodologies used to produce the results will provide the means for monitoring and verifying emissions reductions. Given the data challenges outlined above, the GCF should not penalize countries/projects that have not yet included degradation or enhancement of carbon stocks in the scope of activities under the FREL/FRL. However, the GCF should take note of where degradation is the main source of emissions, that it is included in the FREL/FRL so as not to unfairly favor these countries/projects in the reverse direction. Along this line, the GCF should include in their review criteria the review of deforestation, degradation, and enhancement of carbon stocks across the full landscape related to the request for funding from the GCF in order to adequately assess trade-offs.

2.4: Should a description of how alignment of subnational FREL/REL to national-scale FREL/REL be required?

Yes, this will help to facilitate a nested approach, enhance cohesion, and reduce double counting.

Technical element 3: Operationalization of the 'Cancun safeguards'

3.1 How should the GCF assess the implementation of the Cancun Safeguards in addition to the IFC performance standards (interim GCF ESS)? 3.2 Should the GCF develop additional guidance for the reporting on how the Cancun Safeguards are being respected?

The GCF should first assess areas of convergence among the Cancun Safeguards and the IFC performance standards (e.g. respect for human rights and indigenous peoples), and then identify any additional areas covered by the Cancun Safeguards which are not addressed by the IFC performance standards (interim GCF ESS) - most notably the Sections 2e), f) and g). Through conducting this 'mapping' exercise the GCF will also be able to determine which areas lack guidance and indicators

for how to comply. For example, where the areas of the Cancun Safeguards are aligned with the IFC Performance Standards, there is already significant guidance from which the GCF can draw from in communicating how countries/projects should be illustrating compliance and thus reporting. For the areas not covered by the IFC Performance Standards, the GCF should develop guidance outlining the type of information that countries/project proponents need to provide in order to show compliance, the types of indicators that GCF will use in measuring compliance, and how information will be reported. For the eventual GCF ESS, the information could then be combined into a REDD+ specific ESS guidance. All guidance and criteria should be formulated to allow for context and country specific interpretation and implementation.