



8<sup>th</sup> December 2009

Dear Head of State,

***Please act on your treaty obligation to preserve reservoirs of greenhouse gases by protecting forests from deforestation and forest degradation in both developing and developed countries. The integrity and success of a global deal to avoid dangerous climate change depends on it.***

As the United Nations Framework Convention on Climate Change negotiations open in Copenhagen, the Ecosystems Climate Alliance<sup>1</sup> respectfully requests that you are mindful of the obligation established under Articles 3 and 4(d) of the Framework Convention on Climate Change to *'promote and cooperate in the conservation and enhancement ... of reservoirs of greenhouse gases, ... including forests...'* This obligation must underpin your country's commitment to negotiate strong outcomes for reducing deforestation and forest degradation in both developing countries (REDD) and in developed countries.

Deep cuts in fossil fuel emissions are a necessary but insufficient pre-condition to solving the current climate change problem. Protecting intact forests and peatlands from deforestation and forest degradation is no longer optional if we are to have any hope of stabilizing atmospheric greenhouse gas emissions at a level that avoids dangerous climate change. Effectively protecting forests means, in turn, prioritizing forest governance and robust monitoring, establishing strong safeguards for indigenous peoples' and local communities' rights, addressing land tenure, protecting biodiversity, and enacting policies and measures in *all* countries to reduce the underlying causes of forest loss.

A deal to reduce emissions from deforestation and forest degradation in developing countries (REDD) appears likely to be one of the few concrete outcomes from Copenhagen. But this deal must be part of a broad and binding commitment: Annex I Parties must not use REDD as an opportunity to avoid making deep and real cuts to domestic emissions from other sources. Deep cuts in domestic emissions in developed countries, consistent with the recommendations from current scientific projections, are necessary to prevent drying and loss of forests projected as a result of climate change. They are also part of developed countries 'historical responsibility' for climate change, a responsibility that REDD should not transfer to poor countries.

<sup>1</sup> ECA is an alliance of registered observer organisations currently comprising the Australian Orangutan Project, Environmental Investigation Agency, Global Witness, Humane Society International, Nepenthes, Rainforest Action Network, Rainforest Foundation Norway, The Rainforest Foundation U.K., Wetlands International and The Wilderness Society.

The potential for developed countries to contribute to emissions reduction through forest and wetland protection at home is essentially being ignored in many Annex I countries. It is a common responsibility of all countries to protect the carbon stores in their ecosystems.

In addition, developed countries should also set an example of good forest management and transparent and robust accounting for carbon stores and fluxes at home. Accounting in developed countries should reflect real changes in stores and fluxes from natural ecosystems, so that credible comparisons with historical levels can be made. Yet instead, Annex I countries are currently formulating changes to their own accounting rules for land use, land use change and forestry (LULUCF) that will further contribute to understating emissions and overstating removals.

This inappropriate accounting undermines the credibility of developed country targets. It is important that developing countries insist that LULUCF rules be changed so that they have environmental integrity. Furthermore, developing countries should establish an appropriate and consistent approach to accounting for their own carbon stores and fluxes that ensures REDD cannot be subject to the same perversities. This will require a major investment in building the monitoring and measuring capacity of REDD countries.

The stakes are high. Improperly designed forest mechanisms in the Copenhagen agreement will lack credibility, harm poor people, and will fail to reduce greenhouse gas emissions from deforestation and forest degradation. We ask you to take the issues articulated in this letter and the attached Annex into account within your country's negotiating position on REDD and LULUCF, in order to come away from Copenhagen with an agreement that will truly meet the needs of current and future generations.

Respectfully,

ECA

## **ANNEX: CRITICAL ISSUES FOR A ROBUST REDD AND LULUCF OUTCOME**

**1. The Scope and Objectives for REDD must explicitly prioritise protecting forests from both deforestation and forest degradation.** Basic though it may seem, there is no such explicit mention in the negotiating text. Copenhagen provides an opportunity to introduce specific language on protecting intact natural forests. Without such an unequivocal commitment to protect forests, together with safeguards to ensure protection of biodiversity and avoid conversion of natural forests to plantations, REDD could fund emissive activities such as the introduction of logging and other degrading activities to intact natural forests – precisely the opposite outcome from what parties intend.

**2. REDD should ensure respect for the rights of indigenous peoples and forest dependent communities.** A REDD agreement that does otherwise could lead to alienation of communities from their lands and forced evictions. As highlighted in the Stern and Eliasch Reviews, REDD cannot be effectively implemented without clarification of land tenure and the full and effective participation of indigenous peoples, including their rights to free, prior and informed consent, and local communities. Respecting forest-dependent peoples' rights is instrumental to gaining local credibility for REDD.

**3. REDD must address the global patterns of demand for commodities that cause deforestation and forest degradation, including demand for illegally sourced timber and forest products.** Measures taken in developing countries alone are not enough to stop the destruction of forest reservoirs. In order to effectively conserve greenhouse gas reservoirs, it will also be important to establish obligations on *all* Parties to address the underlying drivers of deforestation.

**4. Governance must lie at the heart of any REDD mechanism with effective monitoring to ensure compliance.** The current text is grossly inadequate in its approach to the monitoring of performance and governance. REDD implementation needs to be monitored closely throughout all phases. This must involve monitoring performance in implementing REDD, including necessary governance reforms, as well as the effective monitoring and independent review of the application of principles and adherence to safeguards.

**5. Significantly increased transparency and comprehensiveness is required for land use and forestry accounting.** The LULUCF negotiations under the Kyoto Protocol track have ignored the obligation to conserve reservoirs. Instead, the focus has been on designing accounting rules to, in effect, hide emissions, especially those from so-called sustainable forest management - an approach that undermines the integrity of developed country targets and overstates the reductions actually being achieved. Developed country parties urgently need to adopt transparent, comprehensive accounting and to report on the achievement of goals and verifiable measures to protect reservoirs of greenhouse gases in natural forests, wetlands and grasslands from all forms of degradation. Further, it is vital that the current opaque and incomplete LULUCF rules are not replicated in REDD. Accounting in both developed and developing countries should reflect real changes in emissions from forests compared to historical levels.