

Comments to Integrity Council for the Voluntary Carbon Market Core Carbon Principles
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Dear ICVCM,

I am writing in response for your call for public consultation on your CCPs and Assessment Framework as a Gates Scholar with a PhD in climate policy from the University of Cambridge. As the ICVCM has stated, “the purpose of the CCPs and Assessment Framework is ultimately to provide a credible, rigorous, and readily accessible means of identifying high-quality carbon credits that create real, additional and verifiable climate impact with high environmental and social integrity,” and to accelerate a “just transition to 1.5 C.” Drawing from the best science and disinterested expertise available, I am writing to suggest that JREDD+ not be considered to meet the CCP criteria. There is no significant evidence that JREDD+ will result in real, additional and verifiable climate impact, nor can CCP assessments of JREDD+ standards adequately ensure high environmental and social integrity. Allowing JREDD+ to be considered for the CCP stamp would harm the integrity of the ICVCM, the CCPs and the Assessment Framework and pose a considerable risk for the ICVCM program as a whole.

REDD+ offset credits have not created real climate impact in terms of GHG emissions reductions, regardless of their design or scale. This is because economic models in REDD+ target countries have not changed to effectively address the drivers of deforestation and forest degradation (Loft et al 2017; Duchelle et al 2019)—namely the global and domestic commodity chains of beef, palm oil, coca, soya, timber, pulp and paper (Duchelle et al 2019). To this end, the International Union of Forest Research Organization’s 2022 report “Forests, Climate, Biodiversity and People: Assessing a Decade of REDD+” states as its first lesson for policymakers: “Addressing drivers of deforestation and forest degradation at multiple levels of governance remains a fundamental component of REDD+ that is not yet effectively tackled.”

We also do not have confidence in REDD+ offset credits in creating real climate impact in terms of GHG emissions reductions due to fundamental problems of permanence and leakage, which remain problems regardless of REDD governance scale. Reversals are a major criticism of all REDD+ projects (see van Oosterzee et al 2012). Research has been done to try to quantify the impacts of REDD+ project implementation has found that rates of forest loss have increased after projects’ end (e.g. Roopsind et al 2019 and Demarchi et al 2021). They have also found evidence of international leakage.

Second, REDD+ projects have also not been proven to create additionality, due to significant uncertainty around whether REDD+ results would have happened in the absence of REDD+ activities. In addition to the numerous studies calling into question the additionality of REDD+ credits, in the first studies of their kind—attempting to model the counterfactual of REDD+ —Ellis et al 2020 undertook a synthetic control analysis of villages engaging in REDD+ in Mexico and found limited evidence of reduction in forest loss due to REDD+ activities, with at least half of the villages showing no impact of REDD+ activities on forest loss. Bos et al (2017) using Before-After-Control-Intervention found minimal impact of

REDD+ interventions on tree cover loss rates in subnational projects in six countries.

Finally, REDD+ and JREDD+ projects have not been proven to have verifiable positive climate impacts, nor have they adequately ensured positive environmental and social integrity impacts, despite the inclusion of safeguards. While there have been significant advances in the use of remote sensing for assessing forest area change, there is still a problem of establishing credible baselines for all types of REDD+ projects. A fundamental problem with this is that forest degradation is harder to detect and measure and monitor than deforestation (yet is estimated to generate between 25% and 65% of total forest-related emissions) by releasing CO₂ and other GHGs (Pörtner et al 2021). In addition, baseline dates for comparing deforestation rates before and after REDD projects can and are at risk of being chosen in ways to ensure positive results for interested parties (West et al 2020).

Furthermore, there is limited direct evidence of desired social and non-carbon environmental outcomes being achieved through REDD+ projects. While safeguards can help, they cannot ensure that harm will not be avoided. Some REDD+ and other PES projects have provided short-term material benefits to forest communities, often in the form of small payments for tree planting or forest-guard duties or community benefits such as fuel-efficient stoves technical support, or school or health clinic buildings. Still, most have failed to generate lasting improvements in living standards, and many have failed to reach those most affected by the losses that result from REDD+ restrictions on their use of land and forest resources (e.g. Sills; Simonet et al; Larson et al.), namely Indigenous Peoples and local communities (IPLC) (Dehm, 2016). Core safeguards lack specificity and legal authority, and often fail to avoid harm due to the inherent subjectivity and conflicts of interest of project managers and consultants hired to determine whether safeguard requirements have been met. Many studies have showed REDD+ projects have indeed caused harm—from fomenting community tensions, to restricting communities from their traditional use of forests, to violent displacement of villages or response to community protest against REDD+ projects.

Despite this, “country progress over the past 10+ years has often been slow in meet the Cancun safeguard requirements, with little guidance from UNFCCC on what safeguards mean in practice and how they should be reported on” (IUFRO 2022). Given the limited legal recognition of IPLC rights to carbon, as well as limited defined benefit-sharing arrangements, more work needs to be done to ensure that the conditions for fair, effective and transparent transactions or REDD+ are in place to ensure equitable outcomes (RRI, 2021). REDD+ implementation currently requires improvements in monitoring for ecological and social non-carbon benefits and adherence to safeguards. However, there is “limited evidence of current progress in ensuring the rights of communities are respected and improved” (IUFRO).

This evidence shows that the fundamental problems of REDD+ (permanence, leakage, additionality, and risk of harm) cannot be ‘designed out’ at any governance scale to ensure high quality carbon offsets. There is no significant evidence that JREDD+ will result in real, additional and verifiable climate impact. Therefore, they cannot be considered high quality. The ICVCM should not recognize them as such, and they should not be considered as an

offset means to contribute to a “just transition to 1.5 C.” Doing so would significantly harm the integrity of the voluntary carbon market as a whole. Instead, the ICVCM’s stamp of approval should be reserved for credits that are conservatively not over-credited and confidently not associated with harm.