



## Open Letter to the COP26 Presidency and Parties to the UNFCCC and CBD on Nature-based Solutions

“Nature-based Solutions” (NbS)<sup>1</sup> seem to offer a straightforward and popular means of tackling both the climate and biodiversity crises. They have garnered significant international attention and feature as one of the UK Presidency’s priorities for COP26. As a group of NGOs working at the intersection of human rights and the environment, we are concerned that the serious limitations and risks of NbS policies, finance and initiatives have not received appropriate attention and consideration. As currently configured, NbS risk delaying climate action in the global north and threatening the rights of indigenous peoples and of communities throughout the world.

There is no doubt that working more closely with nature and adapting and amending human activity to reduce impact on, or support the recovery of, the natural world is imperative. Investing in secure land tenure and rights-based conservation and restoration, are all examples of positive actions that could be classed as NbS. However, many NbS activities currently supported carry serious environmental and human rights risks, which are rarely discussed, understood, or responded to.

The following statement outlines these risks and sets forth recommendations to Her Majesty’s Government (HMG) and other parties to the United Nations Framework Convention on Climate Change (UNFCCC) and the Convention on Biological Diversity (CBD).

### 1. Overstated mitigation potential

Much of the support for NbS is based on the widely repeated claim that they can provide at least a third of global climate mitigation by 2030.<sup>2</sup> This claim primarily derives from a single paper written by The Nature Conservancy’s Bronson Griscom.<sup>3</sup> The simplistic top-line message conceals multiple assumptions, some highly implausible. For example, roughly half of the claimed mitigation potential comes from afforesting nearly 800 million hectares—an area roughly the size of Australia. The social, environmental, economic, political, human rights and logistical challenges of such a continental-scale change in land-use, principally located in the global south, are entirely ignored in the paper.

Another quarter of the claimed mitigation potential relies on the assumption that all deforestation can be stopped globally, and all forest products produced on a sustainable basis, almost instantaneously. However desirable such outcomes might be, decades of experience show that this is not feasible.<sup>4</sup> Implementation at the scale envisaged by these numbers is unlikely to begin before the end of the decade, by which time the chance to prevent catastrophic climate change may be gone.<sup>5</sup> Ecosystems are already losing their capacity to absorb carbon as climate change worsens.<sup>6</sup>

## **2. Carbon dioxide removals do not offset fossil fuel emissions**

Protecting biodiverse ecosystems is hugely important, but the carbon dioxide they sequester cannot compensate for fossil carbon that accumulates in the atmosphere over centuries.<sup>7</sup> We are alarmed by oil, gas and other polluting companies' increasing promotion of NbS to offset their future emissions and meet 'net-zero' pledges, rather than putting forth credible plans to reduce greenhouse gas emissions at the source.<sup>8</sup>

IPBES<sup>9</sup> and IPCC<sup>10</sup> have been very clear: governments should be cutting subsidies for such industries and passing laws to effect a full transition away from fossil fuels. Instead, a disconcerting trend is emerging of governments supporting new carbon markets and hedging the future of our planet on more unproven, voluntary corporate schemes. Mark Carney, the UN Special Envoy on Climate Action and Finance, is leading a Taskforce to create a 100 billion USD voluntary carbon market (TSVCM).<sup>11</sup> The 'Lowering Emissions by Accelerating Forest finance' (LEAF) coalition, which includes the governments of the United States, UK and Norway alongside some of the world's largest companies, will mobilise an initial one billion USD to purchase emission reduction credits from tropical countries.<sup>12</sup>

Natural carbon offsets are not an innovative solution; they have existed for the past 15 years under the label 'REDD+' and have proven to be largely ineffective in reducing emissions or protecting forests.<sup>13</sup> Even heavily structured and financed initiatives such as the Forest Carbon Partnership Facility (FCPF) have been unable to demonstrate actual climate benefits. The social, institutional and economic conditions for credible and equitable emission reduction offsets from tropical countries that can be considered both real and secure remain largely elusive.<sup>14</sup>

Badly designed or executed NbS projects used for offsets (of which there will be many) will deliver a double loss: a failure to reduce emissions effectively or sustainably while enabling continued emissions elsewhere.

## **3. Endangering indigenous peoples' and community rights**

There are serious risks that NbS will exacerbate existing inequalities and injustices. The sheer scale of the land required to deliver on their claimed mitigation potential is likely to increase dispossession, impoverishment, and violation of land and resource rights, particularly in countries where these are not recognised.

Initiatives such as TSVCM and LEAF lack sufficient protections for indigenous peoples and local communities. They continue to rely on forest carbon offset 'standards' such as ART-TREES,<sup>15</sup> which lacks provisions for local participation and gives power to national and subnational governments to issue or sell carbon credits, often originating from lands that are managed, claimed and contested by indigenous peoples and local communities. Even if these shortcomings were addressed, evidence from over a decade of REDD+ projects demonstrates that the existence of standards or safeguard policies does not guarantee they will be respected, monitored, or enforced.<sup>16</sup>

A more effective approach to protecting natural resources would be to focus on rights-based solutions that secure community tenure, strengthen self-governance, and deliver direct support to traditional custodians.

## **4. High levels of risk**

The significant risks of NbS to land tenure, human rights and ecosystems include:

- Massive demand for land that could lead to the expropriation of indigenous peoples' territories, physical and economic displacement, and food insecurity – potentially affecting hundreds of millions of people;<sup>17</sup>
- High risk of sequestration reversals as climate change worsens (e.g. heat stress, changes in hydrological cycle, pests, shifting ecosystem dynamics and steady states, increased tree evapotranspiration and reduced photosynthesis, etc.);
- Likelihood of far-slower uptake and carbon sequestration than hoped-for;
- Strong likelihood that poorly designed and executed NbS will fail, undermining even any nominal carbon sequestration benefits;<sup>18</sup>
- High risk of damage to biodiversity, such as through planting large monocultures of fast-growing exotic tree species;
- Continued high risk of flawed or fraudulent carbon accounting (e.g., inflated baselines, double-counting, impermanence, offsetting against future 'potential' emission reductions);
- Diversion of efforts, resources, and attention away from fossil-fuel reductions and decarbonising economies

## **5. Recommendations**

With the lack of sound scientific underpinning and the history of REDD+ failures, NbS risk being unjust and ineffective unless present approaches are radically changed. We therefore recommend that HMG and other parties to the UNFCCC and the CBD:

- Ensure that NbS are subject to a thorough review by the IPCC, including setting the parameters of effective, acceptable, accountable and rights-based climate actions, before they enter the mainstream of UNFCCC dialogues or are considered for inclusion in the post-2020 Global Biodiversity Framework.
- Ensure NbS are not used as offsets for continued fossil fuel emissions or biodiversity loss.
- Parties to the UNFCCC should adopt a definition of a "conflict of interest" and a rigorous conflict of interest policy framework to protect international and national climate policy from commercial and other vested interests that exacerbate the climate crisis.
- Commission a thorough independent review as to the effectiveness of REDD+ and other natural offset or carbon credit schemes with a view to ensuring future climate funding is used to drive just, positive and equitable change, in particular with respect to the rights of indigenous peoples and local communities.
- Use climate funding to support just and effective pathways to 1.5°C such as scaling up recognition of land rights and community-led ecosystem restoration.
- Prioritise the conservation of 'natural carbon', such as in old-growth and natural forests and peatlands, including through regulatory means and removing subsidies that lead to harmful practices, particularly human rights abuses and deforestation.
- Ensure that all funding for nature and climate protection fully adheres to international human rights law, including full respect of customary tenure and other rights of indigenous peoples and local communities.

## **Signatories**

**AbibiNsroma Foundation**

**African Union of Conservationists (AUC)**

**Association For Promotion Sustainable Development**

**Biofuelwatch**

**Centre d'Actions pour le Développement (CAD)**

**Centre pour l'Environnement et le Développement**

**Climate Justice Programme**

**Ecosystème et Développement**

**Federation of Community Forestry Users Nepal**

**Fern**

**Fight Inequality Alliance, Asia**

**Forest Peoples Programme**

**Forum Ökologie & Papier**

**Global Witness**

**Greenpeace**

**Minority Rights Group International**

**Partnership for Policy Integrity**

**Rainforest Foundation UK**

**Rettet den Regenwald e.V. / Rainforest Rescue**

**Swedish Society for Nature Conservation (SSNC)**

**Water Justice and Gender**

## **References**

<sup>1</sup> Frequently interchanged with “Natural Climate Solutions”.

<sup>2</sup> (2019). Nature-Based Solutions to Address Climate Change. United Nations Global Compact. <https://www.unglobalcompact.org/take-action/events/climate-action-summit-2019/nature-based-solutions>

<sup>3</sup> Griscom, B. et al. (2017). Natural climate solutions. PNAS. vol. 114. no. 44. 11645–11650. <https://www.pnas.org/content/114/44/11645>

<sup>4</sup> Deforestation rates have accelerated since the 2014 New York Declaration on Forests that pledged to halve deforestation rates by 2020 and end it completely by 2030.

<sup>5</sup> (2021). Summary for Policymakers. Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change. Cambridge University Press.

<sup>6</sup> Hubau, W., Lewis, S.L., Phillips, O.L. et al. (2020). Asynchronous carbon sink saturation in African and Amazonian tropical forests. Nature 579, 80–87. <https://www.nature.com/articles/s41586-020-2035-0>

<sup>7</sup> Prentice, I.C., Farquhar, G.D., Fasham, M.J.R., et al. (2001). The Carbon Cycle and Atmospheric Carbon Dioxide. TAR Climate Change 2001: The Scientific Basis. Intergovernmental Panel on Climate Change. <https://www.ipcc.ch/site/assets/uploads/2018/02/TAR-03.pdf>

<sup>8</sup> For example, Shell plans to partially offset a 20 percent expansion of its gas business with NbS, which includes the option of planting trees over an as yet unidentified area the size of Spain.

<sup>9</sup> Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services

<sup>10</sup> Intergovernmental Panel on Climate Change

<sup>11</sup> See, for example, Greenpeace and the Wildlife Trusts raise concerns about Mark Carney’s carbon offsets plan: “A giant get-out-of-jail-free card for polluting companies” | REDD-Monitor (redd-monitor.org)

<sup>12</sup> (2021). LEAF Coalition launched to mobilize more than \$1 billion to protect tropical forests and enhance global climate action. The Sustainable Trade Initiative. <https://www.idhsustainabletrade.com/news/leaf-coalition-launched-to-mobilize-more-than-1-billion-to-protect-tropical-forests-and-enhance-global-climate-action/>.

<sup>13</sup> Clouse, Carol. (2020). The U.N.’s grand plan to save forests hasn’t worked, but some still believe it can. Mongabay.

<https://news.mongabay.com/2020/07/u-n-s-grand-plan-to-save-forests-hasnt-worked-but-some-still-believe-it-can/>.

<sup>14</sup> Kengoum, F. et al. (2020). A decade of REDD+ in a changing political environment in the Democratic Republic of Congo. Center for International Forestry Research. <https://doi.org/10.17528/cifor/007893>.

<sup>15</sup> The Architecture for REDD+ Transactions (ART) Environmental Excellence Standard (TREES)

<sup>16</sup> See, for example, “Are we at fault because our wealth ends up in the hands of those wiracuchas, that they take what is ours and give it to others without us even knowing it?” The Kichwa people oppose exclusionary conservation in the Cordillera Azul National Park in Peru. I FPP (forestpeoples.org)

<sup>17</sup> See, for example, [https://www.forestpeoples.org/sites/default/files/documents/Re-thinking%20nature-based%20solutions\\_Seeking%20transformative%20change%20through%20culture%20and%20rights.pdf](https://www.forestpeoples.org/sites/default/files/documents/Re-thinking%20nature-based%20solutions_Seeking%20transformative%20change%20through%20culture%20and%20rights.pdf)

<sup>18</sup> Seddon, Natalie. (2021). Getting the message right on nature-based solutions to climate change. Global Change Biology. <https://doi.org/10.1111/gcb.15513>

