<u>CORSIA Eligible Emissions Unit Programme Change Notification Form</u>

Version 2.0; Effective from 10 January 2022

PART A: ABOUT THIS FORM

Once an emissions unit programme is approved by the ICAO Council as eligible to supply CORSIA Eligible Emissions Units, the programme commits to notify the ICAO Secretariat of any "material changes" to its "Scope of Eligibility"*, including any unilateral decision to revoke or invalidate a class of CORSIA- eligible emission units within the programme's Scope of Eligibility,* for further review[1] by the Technical Advisory Body (TAB) that advises the ICAO Council on the eligibility of emissions units for use in CORSIA.

> *TAB Procedures*[2] defines a "Material Change" as an update to a programme's *Scope of Eligibility* that would alter the programme's response(s) to any questions in its application form and further inquiries from the TAB over the course of the programme's assessment, including programme-initiated unit invalidation and/or revocation. (paragraph 7.3.).
>
> *TAB Procedures* defines a CORSIA Eligible Emissions Unit Programme's *Scope of Eligibility* as "the extent and limits of a programme's eligibility, which is defined, assessed, and granted on the basis of the programme-level governance structures, measures or mechanisms, and procedures that programmes have in place at the time of their initial submission of application materials to the ICAO Secretariat; and any updates to these procedures that are communicated to TAB during the course of its assessment; and as defined in the general or programme-specific eligibility parameters set out in TAB's recommendations" (paragraph 4.5).

Annually, TAB will indicate deadlines for programmes to notify ICAO of any such material changes. These notifications should be submitted by the next deadline after the material change has occurred; the upcoming deadlines are indicated in the version of the *TAB Work Programme and Timeline* document that is currently effective. This document is available on the CORSIA website[3].

Material changes should be disclosed using this form. TAB will then consider the need for any further review, in line with *TAB Procedures*. If TAB identifies that the change is indeed material and should be further assessed, it will invite public comments on the consistency of the proposed revision with the Emissions Unit Criteria (EUC) and *Guidelines for Criteria Interpretation*. The ICAO Secretariat will inform the programme of TAB's decision to more deeply assess the programme's modification, or its confirmation that the modification is consistent with the CORSIA EUC. The programme will also be informed of the date by which the review will be completed. The length of the review should be determined by the severity and scale of the material change.

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[1] Any unilateral programme-initiated invalidation and/or revocation of a class of CORSIA-eligible emissions units is considered to be a "material change" to the CORSIA-eligible programme's *Scope of Eligibility*. Such units are regarded as immediately ineligible for use for CORSIA purposes in light of absence of assurance that it will administer the units consistent with its *Terms of Eligibility*. The units will be reflected as exclusions from the programme's *Scope of Eligibility* in the ICAO Document "CORSIA Eligible Emissions Units" upon Council's confirmation of the update. Once a programme notifies ICAO that it wishes to exclude a class of units from its eligibility scope, and in order to provide the most accurate and timely information available prior to Council's confirmation of the update, the ICAO Document "CORSIA Eligible Emissions Units" will identify in a footnote that the programme requested a change to its *Scope of Eligibility* to exclude certain units subject to a decision by the ICAO Council and, if possible, clearly specify the affected class of units. The programme's *Scope of Eligibility* that is deemed valid by the ICAO Council will be reflected in the ICAO Document titled "CORSIA Eligible Emissions Units" in a timely manner

[2] In *TAB Procedures*, paragraphs 4.5, 7.3 and 8.2 – 8.6 in particular pertain to the *Scope of Eligibility* and notification and assessment of material changes.

[3] The *TAB Work Programme and Timeline* and *TAB Procedures* documents are available here: https://www.icao.int/environmental-protection/CORSIA/Pages/TAB.aspx

PART B: PROGRAM CHANGE NOTIFICATION(S)

The Programme is requested to provide the following information regarding any modification(s) to the programme's *Scope of Eligibility* that could constitute a "material change" as described above. Report each change separately by duplicating (copying and pasting) the table below as needed.

Programme name: Architecture for REDD+ Transactions (ART)

CHANGE 1
a. Description of the change (e.g., the addition, modification, deletion undertaken):
ART published version 3.0 of The REDD+ Environmental Excellence Standard (TREES) on June 25, 2026. TREES 3.0 reflects four years of experience implementing the Standard across 27 participating programs, including the first IPLC-led jurisdictional REDD+ collaboration, in addition to ongoing input from forest countries, IPLC organizations and representatives, technical assistance providers like UN-REDD, and other stakeholders. The revised Standard ensures TREES continues to represent best practice, including streamlined reporting, improved readability and clearer requirements throughout.
b. Rationale for the change:
TREES requires ART to review the standard at a minimum of every three years in order to account for changing best practices, emerging science and technologies, market trends, and experience implementing the Standard. TREES 3.0 is the result of the most recent regularly scheduled review.
c. Where the change is reflected in the Programme's documentation or other resource(s)[4]:
All materials related to TREES 3.0 are available on the ART website: https://www.artredd.org/standards/trees-3-0/. This includes the full text of TREES 3.0, a Summary of Changes from version 2.0, and a Statement of Reasons explaining the Board's rationale for the most substantive decisions.
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:
Please see the specific changes below, which detail how the new text of TREES 3.0 alters the information previously assessed by TAB.
e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:
Unless otherwise required by ICAO, ART intends this document to reference the updates to our application for the 2027-2029 compliance phase, and thereby also our application for the 2024-2026 compliance phase, noting that the updates do not change the scope of eligibility in the current ICAO Eligible Emissions Units document. We would be happy to answer any additional questions ICAO may have.

[4] If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

CHANGE 2
a. Description of the change (e.g., the addition, modification, deletion undertaken):
The members of the ART and ERT Boards have changed.
b. Rationale for the change:
Both ART and ERT have procedures for regularly rotating Board members.
c. Where the change is reflected in the Programme's documentation or other resource(s)[5]:
The ART Board is documented on the ART website: https://www.artredd.org/about-us/. ART Board terms and procedures are detailed in the ART Board Charter. The ERT Board is documented on the ERT website: https://winrock.org/environmental-resources-trust/
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:
References to the ART and ERT Boards, as related to changes noted above, were included in the March 2025 Second Compliance Period (2027-2029) Phase Application, including: *Section III, Part D, Programme Senior Staff/ Leadership* **Board of Directors of Environmental Resources Trust (all also Winrock Board members)** Maqsoda Maqsodi, President and CEO, Winrock International William Bumpers, Winrock Honorary Director, (Retired) Baker Botts Law Firm Michaela Edwards, Partner at Capricorn Investment Group John Nees, Founding Partner of the Getty Land Company Stacy Swann, CEO and founding partner of Climate Finance Advisors **Architecture for REDD+ Transactions (ART) Board of Advisors** John Verdieck, ART Board Chair Roselyn Fosuah Adjei Carlos Nobre Lucia Ruiz Pasang Dolma Sherpa Peter Umunay Christina Voigt William Bumpers, Winrock Board representative
e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:
The information provided in "d." has been changed as follows: *Section III, Part D, Programme Senior Staff/ Leadership*

[5] If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

Board of Directors of Environmental Resources Trust (all also Winrock Board members) Maqsoda Maqsodi, President and CEO, Winrock International William Bumpers, Winrock Honorary Director, (Retired) Baker Botts Law Firm John Nees, Founding Partner of the Getty Land Company Stacy Swann, CEO and founding partner of Climate Finance Advisors **Architecture for REDD+ Transactions (ART) Board of Advisors** John Verdieck, ART Board Chair Roselyn Fosuah Adjei Lucia Ruiz Frances Seymour Pasang Dolma Sherpa Peter Umunay Christina Voigt William Bumpers, Winrock Board representative

CHANGE 3
a. Description of the change (e.g., the addition, modification, deletion undertaken):
The conflict of interest policies for the ART Board have been modified. The ART Board is now held to the Winrock Code of Conduct, including its Conflict of Interest policy, instead of separate ART Ethical Standards.
b. Rationale for the change:
ART determined that it was unnecessary to develop a separate and parallel system from that within ART's parent organization, Winrock International, just for the ART Board.
c. Where the change is reflected in the Programme's documentation or other resource(s)[6]:
This change has been codified in Section 1.3 (p. 16) of TREES 3.0.
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:
References to the conflict of interest policies for the ART Board, as related to changes noted above, were included in the March 2025 Second Compliance Period (2027-2029) Phase Application, including: *Part 1, Q6, Criteria: Multiple (re: Conflicts of Interest)* **Summary:** As detailed in TREES Section 1.3, to ensure all ART Board members and the ART Secretariat are held to the highest standards for ethics and professional conduct and for avoidance of conflicts of interest, Board members and Secretariat staff shall be subject to the ART Ethical Standards. The Secretariat is also subject to the Conflict of Interest policy as detailed in Winrock's Code of Conduct

[6] If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

(https://code.winrock.org/) which includes a strict and comprehensive policy against engaging in activities that present a conflict of interest. **Evidence:** Section 1.3 of TREES (pg 15) states: To ensure all ART Board members and the ART Secretariat are held to the highest standards for ethics and professional conduct and for avoidance of conflicts of interest, Board members and Secretariat staff shall be subject to the ART Ethical Standards. The Secretariat is also subject to the Conflict of Interest policy as detailed in Winrock's Code of Conduct, including disclosure, review, mitigation and approval by the Winrock Chief Risk and Compliance Officer, whose decision will be reviewed by the ART Ethics Committee. Each Board member and Secretariat staff member is required to regularly affirm in writing that they are in compliance with this policy, that they disclose, avoid and mitigate all Conflicts of Interest, and that they take reasonable action to avoid circumstances that create the appearance of a Conflict of Interest. Board members must disclose any conflicts to the ART Ethics Committee, with a proposed means to mitigate—or minimize—the conflict. The Ethics Committee will make a recommendation to the ART Board, which will review the proposed conflict management approach and have final approval authority. Winrock's Chief Risk and Compliance Officer will be available to consult with the ART Ethics Committee and Board in an Advisory Capacity.
e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:
The information provided in "d." has been changed to reflect the new conflict of interest policies as follows: *Part 1, Q6, Criteria: Multiple (re: Conflicts of Interest)* **Summary:** As detailed in TREES Section 1.3, to ensure all ART Board members and the ART Secretariat are held to the highest standards for ethics and professional conduct and for avoidance of conflicts of interest, Board members and Secretariat staff shall be subject to the Conflict of Interest policy as detailed in Winrock's Code of Conduct (https://code.winrock.org/), which includes a strict and comprehensive policy against engaging in activities that present a conflict of interest. **Evidence:** Section 1.3 of *TREES 3.0* (p.16) states: "To ensure all ART Board members and the ART Secretariat are held to the highest standards for ethics and professional conduct and for avoidance of conflicts of interest, Board members and Secretariat staff shall be subject to the Winrock Code of Conduct, including the Conflict of Interest Policy which outlines disclosure, review, mitigation and approval by the Winrock Chief Risk and Compliance Officer. Each Board member and Secretariat staff member is required to regularly affirm in writing that they are in compliance with this policy, that they disclose, avoid and mitigate all Conflicts of Interest, and that they take reasonable action to avoid circumstances that create the appearance of a Conflict of Interest. Board members must disclose any conflicts to Winrock Chief Risk and Compliance Officer, who will determine a conflict management approach to be disclosed to the ART Board."

CHANGE 4
a. Description of the change (e.g., the addition, modification, deletion undertaken):
The eligible period for subnational accounting has been modified. It has been extended through December 31, 2035, from December 31, 2030 in TREES 2.0.
b. Rationale for the change:
The extension of the period for subnational accounting addresses the need to continue to incentivize subnational JREDD programs, including those comprised of IPLC territories, as a critical step towards national accounting, which is now required by the end of 2035. More information about the Board's decision to extend the timeline is available in the [Statement of Reasons]().
c. Where the change is reflected in the Programme's documentation or other resource(s)[7]:
The change is reflected in Section 3.1.1 (p. 24) of [TREES 3.0](). Other Sections that reference the 2035 deadline are Section 2.3 (p. 20) on the crediting period and Section 6.2 (p. 54) on monitoring and reporting frequency.
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:
References to the timeline for subnational accounting, as related to changes noted above, were included in the March 2025 Second Compliance Period (2027-2029) Phase Application, including: *Part 2, Q1, Criterion: Are quantified, monitored, reported, and verified* **Evidence:** c) Section 6 (pg 40) in *TREES 2.0* addresses monitoring practices, requiring a Monitoring Plan (Section 6.1) and specifying the frequency of monitoring and reporting (Section 6.2): "… For Participants that wish to have credits deemed eligible for ICAO's Carbon Offsetting Scheme for International Aviation (CORSIA), TREES requires that the Participant agree to monitor, report and verify under TREES for a minimum of four five-year crediting periods (20 years). Subnational Participants who shift to be included in national level reporting at the end of 2030, do not need to report separately as long as the national government continues to report under TREES. If the national government chooses not to join ART by the end of 2030 or leaves ART at any time prior to the end of the Subnational Participant's 20-years, the Subnational Participant will be required to continue monitoring, reporting and verifying under TREES for the remainder of its 20-year period." *Part 3, Q3, Criterion: Scope considerations* Section 3.1 (pg 21-23) of *TREES 2.0* defines and publicly discloses eligible entities and the level(s) at which activities are allowed: "… 3.1.1 Subnational accounting During an interim period through December 31, 2030, subnational accounting areas may be registered under ART as a recognized step to national-level accounting. After the interim period,

[7] If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

accounting shall be at a national level. Participants registering subnational accounting areas may be a national government or a subnational government.

Where a subnational accounting area is registered by a national government:

- The boundaries of the subnational accounting area shall correspond with the entire area of one or several administrative jurisdictions no more than one administrative level down from national level and/or one or several recognized Indigenous territories; AND
- The included jurisdiction(s) and/or recognized Indigenous territory(ies) do not need to be contiguous; AND
- Aggregation of jurisdictions and/or recognized indigenous territories must be conducted in line with the safeguards in TREES Section 12; AND
- The total subnational accounting area must be comprised of a total forest area of at least 2.5 million hectares based on area at the beginning of the TREES Crediting Period AND
- The crediting period for subnational accounting shall end on December 31, 2030 regardless of how many years have passed in the crediting period.

Where a subnational accounting area is registered by a subnational government:

- The boundaries of the subnational accounting area shall correspond with the entire area of the single administrative jurisdiction; AND
- The jurisdiction must be comprised of a total forest area of at least 2.5 million hectares based on area at the beginning of the TREES Crediting Period; AND
- The crediting period for subnational accounting shall end on December 31, 2030 regardless of how many years have passed in the crediting period.

Subnational jurisdictions may not aggregate as direct subnational participants, however, they may aggregate as part of a national government submission of a subnational accounting area."

Part 3, Q4, Criterion: Scope considerations

Evidence:
Section 3.1 (pg 21-23) of *TREES 2.0* defines and publicly discloses eligible entities: [see quote in Part 3, Q3 above]

Part 3, Q5, Criterion: Offset credit issuance and retirement procedures

Evidence:
Section 2.3 (pg 18) of *TREES 2.0* defines the length of the crediting period and specifies whether crediting periods are renewable: "The crediting period under TREES shall be five calendar years. The initial crediting period may begin up to four calendar years prior to the year the Participant submits the TREES Concept Note but may not overlap with the historical reference period used to determine the initial crediting level. All subsequent crediting periods shall begin on the date following the end date of the previous crediting period. The crediting period may be less than 5 years only in cases where the Participant is subnational, and must therefore terminate its crediting period on December 31, 2030, per section 3.1.1 of this Standard."

Part 4, Q5, Criterion: Permanence

Evidence:
Section 6.2 of *TREES 2.0* (p 40): [see quote in Part 2, Q1 above]

Part 4, Q12, Criterion: Assess and mitigate against potential increase in emissions elsewhere **Summary:** ART only credits activities at the national level, or at the large subnational level on an interim basis through 2030. Subnational accounting areas must mitigate for leakage by taking a deduction from their quantified emissions reductions and removals. **Evidence:** Section 3.1.1 of *TREES 2.0* (p 21): "During an interim period through December 31, 2030, subnational accounting areas may be registered under ART as a recognized step to national-level accounting. After the interim period, accounting shall be at a national level."
e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:
The information provided in "d." has been changed to reflect the new timeline for subnational accounting as follows: *Part 2, Q1, Criterion: Are quantified, monitored, reported, and verified* **Evidence:** c) Section 6 (p. 54) in *TREES 3.0* addresses monitoring practices, requiring a Monitoring Plan (Section 6.1) and specifying the frequency of monitoring and reporting (Section 6.2): "… For Participants that wish to have credits deemed eligible for ICAO's Carbon Offsetting Scheme for International Aviation (CORSIA) or that wish to have their HFLD credits deemed eligible for an Integrity Council for the Voluntary Market (ICVCM) Core Carbon Principle (CCP) label, TREES requires that the Participant agree to monitor, report and verify under TREES for a minimum of four five-year crediting periods (20 years). Subnational Participants who shift to be included in national level reporting after 2035 do not need to report separately as long as the national government reports under TREES. If the national government chooses not to join ART by the end of 2035 or leaves ART at any time prior to the end of the Subnational Participant's 20-years, the Subnational Participant will be required to continue monitoring, reporting and verifying under TREES for the remainder of its 20-year period." *Part 3, Q3, Criterion: Scope considerations* Section 3.1 (p. 24-27) of *TREES 3.0* defines and publicly discloses eligible entities and the level(s) at which activities are allowed: "… 3.1.1 Subnational Accounting During an interim period through December 31, 2035, subnational accounting areas may be registered under ART as a recognized step to national-level accounting. Participants registering subnational accounting areas may be a national government or a subnational government. After the interim period, Participants shall be national governments and accounting shall be at a national level, though Participants can continue to credit at either the national or the subnational level. Where a subnational accounting area is registered by a national government:

- The boundaries of the subnational accounting area shall correspond with the entire area of one or several administrative jurisdictions no more than one administrative level down from national level and/or one or several recognized Indigenous territories; AND
- The included jurisdiction(s) and/or recognized Indigenous territory(ies) do not need to be contiguous; AND
- Aggregation of jurisdictions and/or recognized Indigenous territories must be conducted in line with the safeguards in TREES Section 12; AND
- The total subnational accounting area must be comprised of a total forest area of at least 2.5 million hectares based on the area at the beginning of the crediting period AND
- After December 31, 2035, the Participant shall report emissions at the national level. Crediting may continue at the subnational level if desired.

Where a subnational accounting area is registered by a subnational government:

- The boundaries of the subnational accounting area shall correspond with the entire area of the single administrative jurisdiction; AND
- The jurisdiction must be comprised of a total forest area of at least 2.5 million hectares based on area at the beginning of the crediting period; AND
- After December 31, 2035, the Participant must be a national government and shall report emissions at the national level. Crediting may continue at the subnational level if desired."

Part 3, Q4, Criterion: Scope considerations

Evidence:
Section 3.1 (p. 24-27) of *TREES 3.0* defines and publicly discloses eligible entities: [see quote in Part 3, Q3 above]

Part 3, Q5, Criterion: Offset credit issuance and retirement procedures

Evidence:
Section 2.3 (p. 20) of *TREES 3.0* defines the length of the crediting period and specifies whether crediting periods are renewable: "The crediting period under TREES shall be five calendar years. The initial crediting period may begin up to four calendar years prior to the year the Participant submits the TREES Concept but shall not overlap with the historical reference period used to determine the initial crediting level. All crediting periods shall begin on January 1 of the first year and end on December 31 of the fifth year in line with the calendar year reporting required in Section 2.5. All subsequent crediting periods shall begin on the date following the end date of the previous crediting period. The crediting period may be less than 5 years only in cases where the Participant is a subnational government, and must therefore terminate its crediting period on December 31, 2035, per section 3.1.1 of this Standard."

Part 4, Q5, Criterion: Permanence

Evidence:
Section 6.2 of *TREES 3.0* (p. 54): [see quote in Part 2, Q1 above]

Part 4, Q12, Criterion: Assess and mitigate against potential increase in emissions elsewhere

Summary:

ART only permits accounting at the national level, or at the large subnational level on an interim basis through 2035. Subnational accounting areas must mitigate for leakage by taking a deduction from their quantified emissions reductions and removals. **Evidence:** Section 3.1.1 of *TREES 3.0* (p. 24): "During an interim period through December 31, 2035, subnational accounting areas may be registered under ART as a recognized step to national-level accounting. Participants registering subnational accounting areas may be a national government or a subnational government. After the interim period, Participants shall be national governments and accounting shall be at a national level, though Participants can continue to credit at either the national or the subnational level."

CHANGE 5
a. Description of the change (e.g., the addition, modification, deletion undertaken):
Two new time-bound Transition Pathways have been added to TREES 3.0. These give country participants in the World Bank's Forest Carbon Partnership Facility (FCPF) Carbon Fund and the World Bank's Initiative for Sustainable Forest Landscapes (ISFL), as well as other eligible Participants, a time-bound opportunity to use alternative accounting area eligibility criteria to join ART. All other requirements of TREES must continue to be met. Any credits issued from accounting areas using a Transition Pathway will be labeled as such in the ART Registry.
b. Rationale for the change:
The Transition Pathways enable jurisdictions to build on work done to date under programs administered by the World Bank and others, and recognize the challenges faced by some key groups of jurisdictions in joining ART. More information around the Board's decision to add the transition pathway is available in the Statement of Reasons.
c. Where the change is reflected in the Programme's documentation or other resource(s)[8]:
The change is reflected in Section 3.1.3 (p. 26-27) and Section 3.1.4 (p. 27) of TREES 3.0.
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:
References to the eligibility requirements for accounting areas, as related to changes noted above, were included in the March 2025 Second Compliance Period (2027-2029) Phase Application, including: *Part 3, Q3, Criterion: Scope considerations* Section 3.1 (pg 21-23) of *TREES 2.0* defines and publicly discloses eligible entities and the level(s) at which activities are allowed: [No text on transition pathways] *Part 3, Q4, Criterion: Scope considerations*

[8] If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

Evidence: Section 3.1 (pg 21-23) of *TREES 2.0* defines and publicly discloses eligible entities: [No text on transition pathways]
e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:
The information provided in “d.” has been appended with the transition pathway eligibility requirements as follows: *Part 3, Q3, Criterion: Scope considerations* Section 3.1 (p. 24-27) of *TREES 3.0* defines and publicly discloses eligible entities and the level(s) at which activities are allowed: “… 3.1.3 Transition Pathway for Forest Carbon Partnership Facility (FCPF) Carbon Fund and Initiative for Sustainable Forest Landscapes (ISFL) Participants In order to facilitate the transition of FCPF Carbon Fund and ISFL Country Participants to ART to continue their jurisdictional programs, those governments who have not yet begun validation under ART may meet the eligibility requirements outlined in Section 3.1.1 or may use the following Transition Pathway eligibility requirements. FCPF Carbon Fund and ISFL Country Participants may use their FCPF or ISFL accounting area for one crediting period if they have a TREES Concept accepted by ART no later than December 31, 2028. After the first crediting period, the Participant can continue in ART using the Transition Pathway criteria for eligible Participants (Section 3.1.4) for the second crediting period, or by changing the accounting area to meet the eligibility criteria of TREES for the second (or any subsequent) crediting period. If the Transition Pathway criteria is used and the accounting area does not meet the TREES requirements for accounting areas described in Section 3.1.1, any credits issued during that crediting period will be labeled as “Transition Pathway” in the ART Registry. Participants using the accounting area Transition Pathway must continue to meet all other requirements of TREES. 3.1.4 Transition Pathway for Eligible Participants Eligible Participants (national or subnational) may join ART with special accounting area Transition Pathway criteria for up to two crediting periods if they have a TREES Concept accepted by ART no later than December 31, 2028, and if they can demonstrate one or more of the following: 1) the Participant previously participated in another REDD+ or readiness program, 2) the Participant’s country contains less than 2.5 million hectares of forest, 3) the Participant is considered a Small Island Developing State, or 4) the Participant’s accounting area is made up of one or more recognized Indigenous territories. Subnational accounting areas for these Participants shall meet the requirements in Section 3.1.1, except that the total subnational accounting area must be comprised of a total forest area of at least 1.25 million hectares based on the area at the beginning of the crediting period. If the accounting area does not meet the TREES requirements for accounting areas described in Section 3.1.1, any credits issued during that crediting period will be labeled as “Transition Pathway” in the ART Registry.

Participants using the accounting area Transition Pathway must continue to meet all other requirements of TREES. Participants may only use the Transition Pathway criteria until December 31, 2035; after this date, all Participants must meet the requirements for accounting areas described in Section 3.1.1." *Part 3, Q4, Criterion: Scope considerations* **Evidence:** Section 3.1 (p. 24-27) of *TREES 3.0* defines and publicly discloses eligible entities: [see quote in Part 3, Q3 above]

CHANGE 6
a. Description of the change (e.g., the addition, modification, deletion undertaken):
The requirements for the REDD+ Implementation Plan have been modified for greater clarity, including more explicitly requiring a description of the drivers of deforestation and degradation and how the REDD+ activities address them, distinction of new and changed activities from ongoing activities, and reporting on the implementation of activities in each TREES Monitoring Report. TREES 3.0 now also requires Participants using the HFLD Crediting Approach to report on activities to address the drivers of deforestation and degradation during the reference period.
b. Rationale for the change:
The changes address a common question about what information Participants are expected to provide around their REDD+ activities. The new requirement for jurisdictions using the HFLD Crediting Approach bolsters the assumption inherent to the HFLD Crediting Approach that emissions are lower than would be expected in the reference period in part because the jurisdiction has already been taking action to mitigate the drivers of deforestation and degradation.
c. Where the change is reflected in the Programme's documentation or other resource(s)[9]:
The change is reflected in Section 3.3 (p. 28) of TREES 3.0.
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:
References to the REDD+ Implementation Plan, as related to changes noted above, were included in the March 2025 Second Compliance Period (2027-2029) Phase Application, including: *Part 3, Q4, Criterion: Scope considerations* **Evidence:** Section 3.2 (pg 23) of *TREES 2.0* defines and publicly discloses which activities are eligible for crediting: "Activities that are eligible under TREES include all REDD+ activities except removals from forests remaining forest. Each TREES Participant shall submit a REDD+ implementation plan as part of the initial documentation and each subsequent TREES Monitoring Report which outlines the new and ongoing programs or activities including locations planned to achieve the ERRs. It is

[9] If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

expected that the implementation plan will be the National REDD+ Strategies/Action Plan developed in accordance with the Warsaw Framework. If a different implementation plan is submitted under TREES, the Participant must explain any differences between the two plans. In the case when a Participant is using a subnational accounting area, the Participant must specify which REDD+ interventions from its National REDD+ Strategies/Action Plan are relevant to the subnational accounting area." *Part 3, Q6, Criterion: Carbon offset programmes must generate units that represent emission reductions, avoidance, or removals that are additional* As outlined in *TREES 2.0* Section 3.2, Participants are required to provide a REDD+ Implementation Plan which outlines the REDD+ activities implemented as part of their program, including regulations and enforcement (p 23): "Each TREES Participant shall submit a REDD+ implementation plan as part of the initial documentation and each subsequent TREES Monitoring Report which outlines the new and ongoing programs or activities including locations planned to achieve the ERRs." *Part 3, Q7, Criterion: Carbon offset programmes must generate units that represent emission reductions, avoidance, or removals that are additional* **Summary:** ART requires all Participants to describe the drivers of deforestation and degradation within their accounting areas, as well as the new and ongoing activities they undertake to mitigate these drivers. The performance-based approach for additionality guarantees that credits will only be issued for reductions and removals beyond the crediting level, ensuring that the new and revised, or improved, REDD+ activities are driving climate mitigation performance and yielding TREES Credits. *Part 3, Q10, Criterion: Carbon offset programmes must generate units that represent emissions reductions, avoidance, or removals that are additional* **Summary:** Like all other ART Participants, TREES requires action from HFLD jurisdictions. Under TREES, all HFLD jurisdictions must have a REDD+ implementation strategy that establishes the new or revised actions they are taking to mitigate the drivers of deforestation and degradation in the crediting period. These actions contribute to low deforestation rates in their jurisdictions, and without financial incentives, it is unlikely that forests in HFLD areas will remain effectively protected.
e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:
The information provided in "d." has been changed to reflect the new REDD+ Implementation Plan requirements as follows: *Part 3, Q4, Criterion: Scope considerations* **Evidence:** Sections 3.2 and 3.3 (p. 28) of *TREES 3.0* define and publicly disclose which activities are eligible for crediting:

“3.2 ELIGIBLE ACTIVITIES
Activities that are eligible under TREES include all REDD+ activities that reduce emissions from deforestation and forest degradation and activities that result in removals from conversion of non-forest areas to forests. ART does not credit for forest carbon stock or removals from growth of intact forest or restoration of degraded forest.

3.3 REDD+ IMPLEMENTATION PLAN
Each ART Participant shall submit a REDD+ Implementation Plan as part of the TREES Registration Document and report on the implementation of activities in each TREES Monitoring Report. This plan must clearly outline the ongoing and new drivers of deforestation and degradation in the TREES accounting area along with the new and changed activities (e.g. policies, measures, actions, and plans), in addition to any ongoing activities, planned or being taken during the crediting period to mitigate these drivers and reduce emissions. Participants using the HFLD Crediting Approach must also describe the activities that have been undertaken to reduce emissions from deforestation and degradation during the reference period (i.e., the five years immediately preceding the crediting period). Participants crediting for removals must outline new and changed activities, in addition to any ongoing activities, to convert non-forest areas to forest during the crediting period. The REDD+ Implementation Plan must also describe where all activities are being conducted.

In the TREES Registration Document, Participants shall explain how the REDD+ Implementation Plan aligns with the National REDD+ Strategy/ Action Plan developed in accordance with the Warsaw Framework for REDD+ or explain any differences. In the case when a national government Participant is using a subnational accounting area, the Participant must specify which REDD+ interventions from its National REDD+ Strategy/ Action Plan are relevant to the subnational accounting area.

Subnational government Participants must explain how the REDD+ Implementation Plan aligns with their subnational REDD+ Strategy if one exists. If a National REDD+ Strategy/ Action Plan exists, the subnational government Participant must also explain how the REDD+ Implementation Plan aligns with the National REDD+ Strategy/ Action Plan.”

Part 3, Q6, Criterion: Carbon offset programmes must generate units that represent emission reductions, avoidance, or removals that are additional

As outlined in *TREES 3.0* Section 3.3, Participants are required to provide a REDD+ Implementation Plan which outlines the REDD+ activities implemented as part of their program, including regulations and enforcement (p 28):
“Each ART Participant shall submit a REDD+ Implementation Plan as part of the TREES Registration Document and report on the implementation of activities in each TREES Monitoring Report. This plan must clearly outline the ongoing and new drivers of deforestation and degradation in the TREES accounting area along with the new and changed activities (e.g. policies, measures, actions, and plans), in addition to any ongoing activities, planned or being taken during the crediting period to mitigate these drivers and reduce emissions. Participants using the HFLD Crediting Approach must also describe the activities that have been undertaken to reduce emissions from deforestation and degradation during the reference period (i.e., the five years immediately preceding the crediting period). Participants crediting for removals must outline new and changed activities, in addition to any ongoing activities, to convert non-forest areas to forest during the crediting period. The REDD+ Implementation Plan must also describe where all activities are being conducted.”

Part 3, Q7, Criterion: Carbon offset programmes must generate units that represent emission reductions, avoidance, or removals that are additional

Summary:
ART requires all Participants to describe the drivers of deforestation and degradation within their accounting areas, as well as the new and changed activities they undertake to mitigate these drivers, in addition to any ongoing activities. The performance-based approach for additionality guarantees that credits will only be issued for reductions and removals beyond the crediting level, ensuring that the new and revised REDD+ activities are driving climate mitigation performance and yielding TREES Credits.

Evidence:
Section 3.3 (p. 28): see response to Part 3, Q6 above.

Part 3, Q10, Criterion: Carbon offset programmes must generate units that represent emissions reductions, avoidance, or removals that are additional

Summary:
Like all other ART Participants, TREES requires action from HFLD jurisdictions. Under TREES, all HFLD jurisdictions must have a REDD+ implementation strategy that establishes the new or revised actions they are taking to mitigate the drivers of deforestation and degradation in the crediting period. These actions contribute to low deforestation rates in their jurisdictions, and without financial incentives, it is unlikely that forests in HFLD areas will remain effectively protected. Under TREES 3.0, all HFLD jurisdictions must also describe the REDD+ actions they took to mitigate deforestation and degradation during the reference period. This requirement further bolsters the case that emissions are low in HFLD jurisdictions in part because of past actions to address the drivers of deforestation and degradation.

Additional Evidence:
Section 3.3 (p. 28) of *TREES 3.0* includes this requirement: “Participants using the HFLD Crediting Approach must also describe the activities that have been undertaken to reduce emissions from deforestation and degradation during the reference period (i.e., the five years immediately preceding the crediting period).”

CHANGE 7
a. Description of the change (e.g., the addition, modification, deletion undertaken):
The eligibility requirements to claim removals have been modified. Participants with deforestation rates below 0.25% may claim removals even if emissions have increased in the same year, as long as the removals are greater than the increase in emissions, and the emissions are no more than 15% above the TREES Crediting Level.
b. Rationale for the change:
This change acknowledges that jurisdictions with sustained, low emissions may be unable to continuously decrease emissions.
c. Where the change is reflected in the Programme’s documentation or other resource(s)[10]:

[10] If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

The change is reflected in Section 4.3 (p. 37) and Section 5.4 (p. 51) of TREES 3.0.
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:
References to eligibility to claim removals, as related to changes noted above, were included in the March 2025 Second Compliance Period (2027-2029) Phase Application, including: *Part 3, Q4, Criterion: Scope considerations* **Evidence:** Section 5.3 (pg 37-38) of *TREES 2.0* defines and publicly discloses the eligibility criteria for jurisdictions that wish to use the Removals crediting approach: "In order to be eligible for crediting from removals, for any year that Participants wish to claim crediting from removals, they must also demonstrate that emissions from deforestation and degradation have been reduced below the TREES Crediting Level during the same year." *Part 3, Q7, Criterion: Carbon offset programmes must generate units that represent emission reductions, avoidance, or removals that are additional* **Summary:** Removals generated using the TREES Removals Crediting Level demonstrate additionality through a two-step process: a. The Participant's emissions from deforestation and degradation have been reduced below the conservative historical TREES Crediting Level during the same year removals credits are sought; in other words, removal activities can only be credited if emission reductions were also achieved in the same accounting area during the same period; and b. … [see Change 8] **Evidence:** Section 5.3 of *TREES 2.0* (p 37-38) on calculating a TREES Crediting Level for removals: "In order to be eligible for crediting from removals, for any year that Participants wish to claim crediting from removals, they must also demonstrate that emissions from deforestation and degradation have been reduced below the TREES Crediting Level during the same year."
e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:
The information provided in "d." has been changed to reflect the modified requirements for eligibility to claim removals as follows: *Part 3, Q4, Criterion: Scope considerations* **Evidence:** Section 4.3 (p. 37) of *TREES 3.0* defines and publicly discloses the eligibility criteria for jurisdictions that wish to use the Removals crediting approach: "In order to be eligible for crediting from removals for any calendar year, Participants must demonstrate that emissions have been reduced below the TREES Crediting Level during that year unless the Participant had a deforestation rate of less than 0.25% in every year of the reference period. In that case, the Participant may claim removals if 1) the removals (Equation 21 or 25) are

greater than any increase in emissions above the TREES Crediting Level and 2) the emissions in the same year are no more than 15% above their TREES Crediting Level." *Part 3, Q7, Criterion: Carbon offset programmes must generate units that represent emission reductions, avoidance, or removals that are additional* **Summary:** Removals generated using the TREES Removals Crediting Level demonstrate additionality through a two-step process: a. The Participant's emissions have been reduced below the conservative historical TREES Crediting Level during the same year removals credits are sought, or, for Participants with very low deforestation rates, have remained within a conservative band; in other words, removal activities can only be credited if emission reductions were also achieved in the same accounting area during the same period, or, for Participants that already have low emissions, if emissions decreased or held steady; and b. …[see Change 8] **Evidence:** Section 4.3 (p. 37) of *TREES 3.0* on calculating a TREES Crediting Level for removals: "In order to be eligible for crediting from removals for any calendar year, Participants must demonstrate that emissions have been reduced below the TREES Crediting Level during that year unless the Participant had a deforestation rate of less than 0.25% in every year of the reference period. In that case, the Participant may claim removals if 1) the removals (Equation 21 or 25) are greater than any increase in emissions above the TREES Crediting Level and 2) the emissions in the same year are no more than 15% above their TREES Crediting Level."

CHANGE 8
a. Description of the change (e.g., the addition, modification, deletion undertaken):
TREES 3.0 clarifies the requirements for removals approach described in TREES 2.0 (the "spatially explicit approach"), and adds an alternative crediting approach for jurisdictions wishing to use sample-based data (the "sample-based approach"). Participants using the spatially explicit approach must provide an explicit link between each polygon of removals and the REDD+ activities. As in TREES 2.0, Participants crediting for commercial forest using the spatially explicit approach use a 5-year historical average of new removals areas as the crediting level, while Participants crediting natural forest restoration using the spatially explicit approach use a zero crediting level for new removals areas. New in TREES 3.0, to use the zero crediting level Participants must also demonstrate that the REDD+ activities would not have occurred in the absence of the program. Participants using the new sample-based approach use a 5-year historical average of new removals areas as the crediting level. The two approaches also have different requirements for activity data.
b. Rationale for the change:
In discussions with supply jurisdictions, it has become clear that many jurisdictions do not have data on conversion of non-forest to forest in the format required under TREES 2.0. Instead, many jurisdictions have removals data in the form of sample-based area estimates or wall-to-wall maps, similar to how they account for emissions. The change recognizes that collecting removals polygons requires significant effort and provides an alternative for jurisdictions to use the data they already have. More information around the Board's decision to add a second removals approach is available in the Statement of Reasons.

c. Where the change is reflected in the Programme's documentation or other resource(s)[11]:
The two removals crediting approaches are described in Section 4.3 (p. 37-41) of TREES 3.0. The requirements for activity data for the two approaches are described in Section 5.2.1 (p. 47-49). The equations presented in Section 10.3 (p. 62-68) have also been modified to reflect the two approaches.
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:
References to the removals crediting approach, as related to changes noted above, were included in the March 2025 Second Compliance Period (2027-2029) Phase Application, including: *Part 3, Q7, Criterion: Carbon offset programmes must generate units that represent emission reductions, avoidance, or removals that are additional* **Summary:** Removals generated using the TREES Removals Crediting Level demonstrate additionality through a two-step process: a. … [see Change 7] b. The Participant's monitored and reported removals are verifiably above the TREES Removals Crediting Level based on a historical 5-year reference period. **Evidence:** Section 5.3 of *TREES 2.0* (p 37-38) on calculating a TREES Crediting Level for removals: "The crediting level for removals consists of an average annual area of conversion from non-forest to forest during the 5 calendar-year reference period. Annual areas converted from non-forest to forest during the crediting period that exceed the 5-year historical average are eligible for crediting. … If stratification clearly distinguishes the areas of natural forest restoration, they can be treated separately from commercial forests. All new areas of natural forest restoration reported under ART are eligible for crediting16; and, upon entering ART the incremental growth that occurs during the crediting period, on all areas of natural forest restored up to ten (10) years prior to the start of the crediting period start date is eligible for removals crediting. If unable to stratify between commercial forest and natural forest restoration (or for commercial forest only), the crediting level shall be established using an average of the annual area of conversion of non-forest to forest during the 5 calendar-year historical period preceding the crediting period. This annual average area of non-forest to forest conversion shall serve as the crediting level for removals crediting." *Part 3, Q11, Criterion: Are based on a realistic and credible baseline* **TREES removals approach** **Summary:** The Removals approach under TREES likewise uses a baseline based on historical data, using the average area in hectares of commercial planting and natural restoration during the five-year historical reference period. Participants track any new removals areas that are planted during each year of the crediting period. If the areas of natural forest restoration and commercial planting can be tracked separately (stratified), they are treated differently, allowing all areas of natural

[11] If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

restoration as eligible for removals crediting versus only new areas that exceed the crediting level area for commercial planting. In both cases, the area is then multiplied by the appropriate removal factor, which should take into account forest type, age, mortality rates and any other parameters that influence biomass accumulation. In addition, ART offers a lookback period for removals from natural restoration. Areas of natural forest restoration and planting that were planted up to 10 years prior to the TREES crediting period start date (up to four years prior to joining ART) and otherwise meet all TREES MRV and safeguards requirements are eligible for removals crediting, but only for the incremental growth of these areas that occurs during the crediting period. As with the TREES Crediting Level, Participants must use the 5-year period immediately preceding the crediting period to set the baseline ("reference period"), demonstrate that all carbon estimation and quantification approaches conform with best practices. **Evidence:** Section 4 of *TREES 2.0* (p 25-32) describes the requirements for carbon accounting under TREES. Section 5.3 of *TREES 2.0* (p 38-39) describes the conditions for setting the Removals crediting level: "The crediting level for removals consists of an average annual area of conversion from non-forest to forest during the 5 calendar-year reference period. Annual areas converted from non-forest to forest during the crediting period that exceed the 5-year historical average are eligible for crediting. Annual areas of conversion of non-forest to forest can be derived from remote sensing and/or verifiable recorded statistics, and the source of activity data must be consistent between the reference period and the crediting period to ensure consistent monitoring of the ongoing removals stratum. Annual areas of non-forest converted to forest shall either be recorded or interpolated… If stratification clearly distinguishes the areas of natural forest restoration, they can be treated separately from commercial forests. All new areas of natural forest restoration reported under ART are eligible for crediting16; and, upon entering ART the incremental growth that occurs during the crediting period, on all areas of natural forest restored up to ten (10) years prior to the start of the crediting period start date is eligible for removals crediting. If unable to stratify between commercial forest and natural forest restoration (or for commercial forest only), the crediting level shall be established using an average of the annual area of conversion of non-forest to forest during the 5 calendar-year historical period preceding the crediting period. This annual average area of non-forest to forest conversion shall serve as the crediting level for removals crediting." Sections 7 (p 41-44) and 8 (p 45-46) of *TREES 2.0* describe the deductions that Participants must take for uncertainty, permanence, and leakage.
e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:
The information provided in "d." has been changed to reflect the two removals crediting approaches as follows: *Part 3, Q7, Criterion: Carbon offset programmes must generate units that represent emission reductions, avoidance, or removals that are additional* **Summary:** Removals generated using the TREES Removals Crediting Level demonstrate additionality through a two- or three- step process: a. … [see Change 7]

b. The Participant's monitored and reported removals are verifiably above the TREES Removals Crediting Level. For Participants using the sample based approach or crediting for commercial forests under the spatially explicit approach, the Crediting Level is based on the area of new removals planted or restored during the historical 5-year reference period. Participants using the spatially explicit approach for natural forest restoration may use a zero crediting level
c. Participants using the spatially explicit approach for natural forest restoration must demonstrate that the program's REDD+ activities, to which each removals area has an explicit and documented link, would not have occurred in the absence of the program.

Evidence:
Section 4.3 of *TREES 3.0* (p 37-41) on calculating a TREES Crediting Level for removals:

"Removals from the conversion of non-forest to forest are eligible under TREES. TREES provides two approaches for establishing a crediting level for removals, as described in Section 4.3.1 and Section 4.3.2.
…
4.3.1 Spatially Explicit Removals Crediting Approach
The spatially explicit removals crediting approach may be used for crediting removals from natural forest restoration and commercial forest. Commercial forest is eligible for removals crediting only under this approach. To use the spatially explicit approach, the Participant shall demonstrate that each area used for removals crediting:

- is defined using georeferenced data following the requirements of Section 5.2.1.1;
- has been converted from non-forest to forest and was forest prior to becoming non-forest;
- was non-forest for a minimum of five (5) years prior to the start of planting or restoration;
- has an explicit, documented link6 to the Participant's REDD+ activities from Section 3.3;
- is assigned to an applicable removals stratum, including whether the area is commercial forest or natural forest restoration; and
- is monitored over time in accordance with Section 5.2.1.1.

4.3.1.1 REQUIREMENTS FOR NATURAL FOREST RESTORATION
…
Removals from natural forest restoration under the spatially explicit approach shall use a zero-crediting level. Under this approach, all new areas of natural forest restoration during the crediting period that meet the above requirements are eligible for crediting. In addition, Participants may also claim the incremental growth that occurs during each crediting period on eligible areas of natural forest restoration established up to ten (10) years prior to the start of the Participant's initial crediting period.
…
In order to ensure that crediting is consistent with having a crediting level above business-asusual7 , the Participant shall demonstrate that the program's REDD+ activities, to which the removals areas have an explicit and documented link, would not have occurred in the absence of the program. Participants must also deduct 1% of the removals quantified in each year prior to taking leakage or buffer pool deductions (see Equation 16 in Section 10.3.1.1).

4.3.1.2 REQUIREMENTS FOR COMMERCIAL FOREST
…
The crediting level for removals from commercial forests shall be the average of the annual eligible area of conversion of non-forest to commercial forest during the reference period (Equation 6).
…
The Participant shall then determine the eligible area for crediting in each year of the crediting period by comparing the eligible area of conversion of non-forest to commercial forest in each year of the crediting period against this crediting level. Annual area in excess of the crediting level shall be eligible for crediting.

…

4.3.2 Sample-Based Removals Crediting Approach

The sample-based approach may be used only for natural forest restoration; conversion from non-forest to commercial forest must be excluded from removals crediting under this approach.

To use the sample-based approach, the Participant shall demonstrate that the removals accounting: meets the requirements of Section 5.2.1.2;

- estimates areas of conversion from non-forest to forest that were forest prior to becoming non-forest;
- includes only lands that were non-forest for a period of five (5) years prior to the start of planting or restoration;
- excludes conversion of non-forest to commercial forest; and
- monitors previously restored areas over time in accordance with Section 5.2.1.2.

Under the sample-based approach, the Participant shall include REDD+ activities related to removals in their REDD+ Implementation Plan (Section 3.3) but need not link such activities to specific areas of removals.

For removals from natural forest restoration under the sample-based approach, the crediting level shall be the average of the annual area of conversion of non-forest to forest during the reference period (Equation 7).
…"

Part 3, Q11, Criterion: Are based on a realistic and credible baseline

TREES removals approach

Summary:
The Removals approach under TREES likewise uses a baseline based on historical data for the sample-based approach and for commercial forest under the spatially explicit approach, using the average area in hectares of planting and restoration during the five-year historical reference period. Participants track any new removals areas that are planted/ restored during each year of the crediting period, and are eligible to credit for new areas that exceed the crediting level area.

Natural forest restoration using the spatially explicit approach is treated differently. The approach requires polygons of removals areas, a documented link between each removal area and the REDD+ activities, and a demonstration that the REDD+ activities would not have occurred in the absence of the program. As appropriate for the high level of documentation required to demonstrate additionality, Participants using this approach will be eligible to use a zero baseline for removals from natural forest restoration. In addition, areas of natural forest restoration that were planted/ restored up to 10 years prior to the TREES crediting period start date (up to four years prior to joining ART) and otherwise meet all TREES MRV and safeguards requirements are eligible for removals crediting, but only for the incremental growth of these areas that occurs during the crediting period.

In all cases, the area eligible for crediting is then multiplied by the appropriate removal factor, which should take into account forest type, age, mortality rates and any other parameters that influence biomass accumulation.

As with the TREES Crediting Level, Participants must use the 5-year period immediately preceding the crediting period to set the baseline ("reference period") and demonstrate that all carbon estimation and quantification approaches conform with best practices. **Evidence:** Section 5 of *TREES 3.0* (p 42-53) describes the requirements for carbon accounting under TREES. Section 4.3 of *TREES 3.0* (p 37-41) describes the conditions for setting the Removals crediting level: [see text provided for Part 3, Q7] Sections 7 (p 55-57) and 8 (p 58-59) of *TREES 3.0* describe the deductions that Participants must take for uncertainty, permanence, and leakage.

CHANGE 9
a. Description of the change (e.g., the addition, modification, deletion undertaken):
TREES 3.0 includes new requirements to ensure that baselines for all three crediting approaches are quantifiably demonstrated to be below business-as-usual (or above business-as-usual, in the case of removals). The requirements generally require Participants to quantitatively demonstrate that the baseline is already below/ above business-as-usual, or take a 1% deduction.
b. Rationale for the change:
This change was made in recognition of the updated interpretation of CORSIA guidelines related to below business-as-usual baselines and the increasing emphasis on below business-as-usual baselines in the market. A 1% deduction represents a real, but not overly punitive, decrease in the baseline. This aligns with the 1% materiality threshold for TREES as specified in the TREES Validation and Verification Standard. More information about the Board's decision on below business-as-usual baseline is available in the Statement of Reasons.
c. Where the change is reflected in the Programme's documentation or other resource(s)[12]:
The provisions for ensuring baselines are set below (or above, in the case of removals) business-as-usual are included in Sections 4.1 (p. 33-34), 4.2 (p. 34-37), and 4.3 (p. 37-41) of TREES 3.0.
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:
References to setting baselines below/above business-as-usual, as related to changes noted above, were included in the March 2025 Second Compliance Period (2027-2029) Phase Application, including: *Part 3, Q11, Criterion: Are based on a realistic and credible baseline* The information provided in the previous application remains applicable (except the changes to removals crediting described in Change 8). However, the new requirements provide additional evidence for the response for question 11b, as described in section "e".

[12] If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

Part 3, Q10, Criterion: Carbon offset programmes must generate units that represent emissions reductions, avoidance, or removals that are additional

Summary:
Therefore, recognizing the growing threats to all tropical forests, a conservative approach to HFLD crediting that considers the unique circumstances of this category of forests is crucial. To qualify for HFLD Crediting, Participants must meet the HFLD Score threshold (publicly explained in Section 5.2.1 of *TREES 2.0*, p 34-35). The HFLD Score is a composite of the Participant's Deforestation Rate Score and Forest Cover Score. This "positive list" additionality approach for HFLD is different than the performance-standard approach for non-HFLD emission reductions and removals credits. Under TREES, only jurisdictions that meet the rigorous HFLD threshold values for high forest carbon stocks and low deforestation rates are eligible to utilize the optional HFLD crediting approach.

The TREES HFLD methodology sets a reference level based on average emissions from deforestation and forest degradation in the recent past, plus a percentage of the remaining forests' carbon stock, which is used as a conservative proxy of forest loss across the entire jurisdiction's accounting area if no REDD+ conservation actions are undertaken. TREES only calculates emission reductions based on a fraction (less than 0.05%) of a jurisdiction's carbon stock — meaning that credits are conservatively-issued and meet the additionality criterion for carbon market financing. The total percentage is actually less than 0.05% because it is multiplied by the HFLD Score, which by definition will always be less than one. This means that to set the HFLD Crediting Level, the TREES Crediting Level is adjusted by less than 0.05% of the standing forest carbon stock in the HFLD jurisdiction, and this small fraction represents a conservative proxy (Teo et al. 2024) of the actual risk of deforestation or forest degradation in HFLD jurisdictions.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

The information provided in "d." has been changed to reflect the new requirements as follows:

Part 3, Q11, Criterion: Are based on a realistic and credible baseline

TREES emission reduction approach

Summary:
In addition, to ensure the baseline represents below business-as-usual, Participants must either take a 1% deduction to the crediting level or provide quantitative evidence that the TREES Crediting Level already represents a below business-as-usual scenario.

Evidence:
From Section 4.1 (p. 33) of *TREES 3.0*, Calculating a TREES Crediting Level for Emissions: "To ensure the crediting level is below business-as-usual, the Participant shall decrease the crediting level by 1% in each crediting period. As an alternative to decreasing the crediting level, the Participant may instead provide quantitative evidence that the TREES Crediting Level is conservative compared to the threat of emissions during the crediting period from the drivers of deforestation and degradation outlined in the REDD+ Implementation Plan."

TREES removals approach

Summary:

In addition, TREES 3.0 has explicit requirements to ensure the baselines are above business-as-usual. For the sample-based approach and for commercial forest under the spatially explicit approach, both of which use a five-year historical average as the baseline, Participants must either take a 1% increase to the crediting level or provide quantitative evidence that the Removals Crediting Level already represents an above business-as-usual scenario. For natural forest restoration under the spatially explicit approach, Participants must demonstrate that the REDD+ activities, to which each removals area has an explicit link, would not have occurred in the absence of the program (demonstrating that the zero crediting level represents business-as-usual) and take a 1% deduction on the quantified removals (to ensure consistency with crediting above business-as-usual).

Evidence:
From Section 4.3.1.1 (p. 38) of *TREES 3.0*, Requirements for Natural Forest Restoration under the Spatially Explicit Removals Crediting Approach: "In order to ensure that crediting is consistent with having a crediting level above business-as usual, the Participant shall demonstrate that the program's REDD+ activities, to which the removals areas have an explicit and documented link, would not have occurred in the absence of the program. Participants must also deduct 1% of the removals quantified in each year prior to taking leakage or buffer pool deductions (see Equation 16 in Section 10.3.1.1)."

From Section 4.3.1.2 (p. 38) of *TREES 3.0*, Requirements for Commercial Forest under the Spatially Explicit Removals Crediting Approach: "To ensure the crediting level is above business-as-usual, the Participant must then increase the crediting level by 1%. As an alternative to increasing the crediting level, the Participant may instead describe the country-specific circumstances that demonstrate that the 5-year historical average is higher than would occur without the REDD+ activities, and estimate/ quantify the expected area of removals in the absence of program activities."

From Section 4.3.2 (p. 40) of *TREES 3.0*, Sample-Based Removals Crediting Approach: "To ensure the crediting level is above business-as-usual, the Participant must then increase the crediting level by 1%. As an alternative to increasing the crediting level, the Participant may instead describe the country-specific circumstances that demonstrate that the 5-year historical average is higher than would occur without the REDD+ activities, and estimate/ quantify the expected area of removals in the absence of program activities."

<u>HFLD emission reduction approach</u>

Summary:
In addition, Participants must provide quantitative evidence that the HFLD Crediting Level represents a below business-as-usual scenario.

Evidence:
From Section 4.2.2 (p. 36) of TREES 3.0, on HFLD Crediting Approach: "To ensure the crediting level is below business-as-usual, at the start of each crediting period, the Participant shall provide quantitative evidence that the HFLD Crediting Level is conservative compared to the threat of emissions during the crediting period from the drivers of deforestation and degradation outlined in the REDD+ Implementation Plan."

Part 3, Q10, Criterion: Carbon offset programmes must generate units that represent emissions reductions, avoidance, or removals that are additional

Summary:
Therefore, recognizing the growing threats to all tropical forests, a conservative approach to HFLD crediting that considers the unique circumstances of this category of forests is crucial. To qualify for HFLD Crediting, Participants must meet the HFLD Score threshold (publicly explained in Section 5.2.1 of *TREES 2.0*, p 34-35). The HFLD Score is a composite of the Participant's Deforestation Rate Score and Forest Cover Score. This "positive list" additionality approach for HFLD is different than the performance-standard approach for non-HFLD emission reductions and removals credits. Under TREES, only jurisdictions that meet the rigorous HFLD threshold values for high forest carbon stocks and low deforestation rates are eligible to utilize the optional HFLD crediting approach. Under TREES 3.0, Participants must also provide quantitative evidence that the HFLD Crediting Level is conservative compared to the threat of emissions during the crediting period, providing another "positive list" criteria that jurisdictions must meet.

The TREES HFLD methodology sets a reference level based on average emissions from deforestation and forest degradation in the recent past, plus a percentage of the remaining forests' carbon stock, which is used as a conservative proxy of forest loss across the entire jurisdiction's accounting area if no REDD+ conservation actions are undertaken. TREES only calculates emission reductions based on a fraction (less than 0.05%) of a jurisdiction's carbon stock — meaning that credits are conservatively-issued and meet the additionality criterion for carbon market financing. The total percentage is actually less than 0.05% because it is multiplied by the HFLD Score, which by definition will always be less than one. This means that to set the HFLD Crediting Level, the TREES Crediting Level is adjusted by less than 0.05% of the standing forest carbon stock in the HFLD jurisdiction, and this small fraction represents a conservative proxy (Teo et al. 2024) of the actual risk of deforestation or forest degradation in HFLD jurisdictions. Under TREES 3.0, Participants must provide quantitative evidence that the proxy is conservative for that particular jurisdiction and crediting period.

Additional Evidence:
From Section 4.2.2 (p. 36) of TREES 3.0, on HFLD Crediting Approach: "To ensure the crediting level is below business-as-usual, at the start of each crediting period, the Participant shall provide quantitative evidence that the HFLD Crediting Level is conservative compared to the threat of emissions during the crediting period from the drivers of deforestation and degradation outlined in the REDD+ Implementation Plan."

CHANGE 10
a. Description of the change (e.g., the addition, modification, deletion undertaken):
TREES 3.0 introduces a new TREES Reversal Risk Rating Tool, which takes elements of the TREES 2.0 risk assessment but puts them into a tabular form with additional ratings categories. The new tool starts with a minimum value of 5% and then adds to it based on the jurisdiction-specific level of risk in each category rather than starting with a maximum and subtracting from it. Participants must assess their risk over three categories: Governance Risk, Program Continuity Risk, and Vulnerability to Disturbances Risk. Specific indicators are included for each category.
b. Rationale for the change:
The new TREES Reversal Risk Rating Tool is more similar to that used by other standards, and provides more distinct ratings to accurately reflect local contexts and to obtain unique risk ratings for each Participant. Across the market, there has also been a general movement towards more country-specific, objective parameters, such as those included in the new TREES Reversal Risk Rating Tool. Using risk-category headings also serves to make the included risks more transparent to stakeholders and to more clearly articulate the risks being evaluated. More information about the Board's decision to introduce a new risk tool is available in the Statement of Reasons.

c. Where the change is reflected in the Programme's documentation or other resource(s)[13]:
Participants are instructed to use the TREES Reversal Risk Rating Tool as the basis for their buffer pool contribution in Section 7.1 (p. 55-56) of TREES 3.0. The TREES Reversal Risk Rating Tool is available as a stand-alone document on the ART website.
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:
References to reversal risk assessment, as related to changes noted above, were included in the March 2025 Second Compliance Period (2027-2029) Phase Application, including: *Part 4, Q2, Criterion: Permanence* **Summary:** Section 7.1.1 of *TREES 2.0* outlines the Reversal Risk Assessment that all Participants must complete. The risk assessment has been designed to be appropriate for a jurisdictional scale and encompasses factors such as political risk, enforcement of laws, natural disasters, and the reversal mitigation plan to decrease the likelihood and/or impact of potential reversals. For contributions to the buffer pool, TREES sets the reversal risk deduction at a starting point of 25% for all Participants. This standard reversal risk deduction was informed by a review of risk contributions by projects and programs in existing GHG programs and standards, as well as a review of actual annual deforestation rates in several large forest countries. This standard deduction can be reduced if Participants can demonstrate that mitigating factors are in place to lessen the risk of reversals, as listed in the evidence section. **Evidence:** Section 7.1.1 of *TREES 2.0* (p 41-42): "TREES establishes a starting level of reversal risk for Participants of 25%. The starting risk level may be lowered if Participants can demonstrate that mitigating factors exist. The risk level is associated with a buffer deduction taken from the final verified TREES ERR quantity prior to each issuance. Participants must determine the number of TREES credits that will be contributed to the buffer at each issuance. Each monitoring report must identify the buffer contribution and all justifications for the contribution for each year reported. TREES considers three risk mitigating factors (below) that affect the success of the Participant. Each factor shall be assessed and verified for each calendar year reported. They are applied to the buffer pool contribution of a given year only when demonstrated that the mitigating factor was in place, or applicable, for the entire year. **MITIGATING FACTOR 1 (-5%):** Legislation or executive decrees actively implemented and demonstrably supporting REDD+, issued by a relevant government agency, or with leadership from the Presidential or Prime Ministerial Office. **MITIGATING FACTOR 2 (-10%):** Demonstrated interannual variability of less than 15% in annual forest emissions over the prior 5 years used in TREES Reporting. HFLD Participants automatically qualify for this mitigating factor. **MITIGATING FACTOR 3 (-5%):** Demonstrated national reversal mitigation actions, plan or strategy developed in alignment with Cancun Safeguard F."

[13] If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

The information provided in "d." has been changed to reflect the new TREES Reversal Risk Rating Tool as follows:

Part 4, Q2, Criterion: Permanence

Summary:
Section 7.1.1 of *TREES 3.0* requires all Participants to use the TREES Reversal Risk Rating Tool as the basis for their buffer pool contribution. The TREES Reversal Risk Rating Tool has been designed to be appropriate for a jurisdictional scale and encompasses reversal risks related to governance, program continuity, and vulnerability to disturbances. All Participants begin with a 5% assumed level of risk, to which is added the jurisdiction-specific risk in each category, up to a maximum of 25%. This range of risk values were informed by a review of risk contributions by projects and programs in existing GHG programs and standards, as well as a review of actual annual deforestation rates in several large forest countries.

Evidence:
Section 7.1.1 of *TREES 3.0* (p 55):
"Participants shall assess their jurisdiction-specific level of reversal risk in accordance with the TREES Reversal Risk Rating Tool. The Participant shall use the latest approved TREES Reversal Risk Rating Tool available on the ART website. The total risk rating is calculated for each reporting year and is the result of the analysis, unless the Participant has reported a reversal in either the Initial TREES Monitoring Report or within the last five years of reporting. In these instances, the total risk rating is as outlined in Section 7.1.3."

TREES Reversal Risk Rating Tool:

Per Section 7.1.1 of The REDD+ Environmental Excellence Standard (TREES), version 3.0, Participants must use this tool to assess their jurisdiction-specific level of reversal risk. The risk rating shall be calculated for each reporting year using this tool, and the result is used to define the Participant's contribution to the buffer pool.

Each Participant shall begin with a 5% assumed level of risk. Participants shall then assess their jurisdiction-specific level of risk in each category. The total risk rating is the sum of the assumed level of risk plus the Participant Risk values across all categories.

Risk Category		Level of Risk	Risk rating
Governance Risk			
	REDD+ Program Governance: Is the REDD+ program or its activities/underlying framework mandated by law, policy or other legally binding instrument?	High: No Low: Yes	2% 0%
	Country Governance: What is the average Worldwide Governance Indicator (WGI) score across all six indicators for the past five years?	High: < 45 Medium: 45 - <55	3% 1%

		Low: >/= 55	0%
Program Continuity Risk			
	Experience/Capacity: Has the REDD+ program or the framework being used for the program operated and/or received multiple results-based payments for decoupling deforestation and degradation from economic development or participated in a climate finance program prior to ART?	High: No Medium: Yes, continuous participation and/or multiple payments for <10 years Low: Yes, continuous participation and/or multiple payments for >/= 10 years	3% 1% 0%
	Inclusivity: Is there a formal multi-stakeholder committee (including IPLCs, other Government agencies, private sector, and others) or other group that demonstrably provides ongoing inputs and support for the REDD+ program?	High: No Low: Yes	2% 0%
Vulnerability to Disturbances			
	Disturbance Impact: Has forest in the accounting area been impacted by natural disturbances in the last 5 years (including but not limited to fires (natural or manmade), extreme weather, flood, or pests)? If yes, determine the % of forest in the accounting area impacted cumulatively over the last five years.	High: >1% Medium: 0.5 – 1% Low: <0.5%	8% 5% 0%
	Mitigation Plans: Does the program have a robust system for preventing or minimizing the impact of disturbances, such as a fire detection and response program or flood prevention measures?	High: No Low: Yes	2% 0%

CHANGE 11
a. Description of the change (e.g., the addition, modification, deletion undertaken):
TREES 3.0 modified safeguards requirements by combining the Structure and Process indicators into a single Structure and Process indicator, clarifying the reporting requirements and timeline for all indicators, and revising language throughout for greater clarity. Some of the text for individual safeguard indicators has changed slightly, but these changes do not impact the answers previously provided to ICAO.
b. Rationale for the change:

The changes improve the clarity of the requirements and address common questions. Combining the Structure and Process indicators streamlines reporting requirements to ease the burden on jurisdictions and improving accessibility for stakeholders without changing the requirements.
c. Where the change is reflected in the Programme's documentation or other resource(s)[14]:
Safeguards requirements are described in Section 12 (p. 74-82) of TREES 3.0. Validation and verification requirements are described in Section 3.5 (p. 22), Section 3.6 (p. 24) and Section 3.8.3.4 (p. 27) of the TVVS 3.0.
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:
References to safeguards, as related to changes noted above, were included in the March 2025 Second Compliance Period (2027-2029) Phase Application, including: *Part 1, Q12, Criteria: Safeguards system and Do no net harm* **Summary:** There are three types of indicators: Structure—demonstrate the relevant governance arrangements (e.g., policies, laws, and institutional arrangements) that are in place in the country and applicable jurisdiction for the case of subnational Participants under TREES and guarantee the implementation of REDD+ actions is done in consistency with Cancun Safeguards; Process—demonstrate that relevant institutional mandates, as well as processes, procedures, and/or mechanisms that are in place and enforced in the country for the implementation of REDD+ actions in consistency with the Cancun Safeguards; and Outcome—demonstrate implementation outcomes against the themes under which Cancun Safeguards have been unpacked, in consistency with the respect of rights and fulfillment of duties in accordance with international and national legislation and applicable jurisdictional legislation for the case of subnational Participants under TREES. At the start of the first crediting period, Participants must demonstrate conformance with Cancun Safeguards by reporting against all structure and process indicators. In addition, at the beginning of the first crediting period, Participants must either demonstrate conformance with the outcome indicators or present a plan for defining and implementing context-specific monitoring parameters within five years of joining ART. Within five years of joining ART, Participants must demonstrate conformance with all structure, process and outcome indicators under all themes under each of the Cancun Safeguards. **Evidence:** Section 12 of *TREES 2.0* (p 55-64) describes the safeguards under TREES. The safeguards themselves (Section 12.5, p 57-64) are copied below. More information is also available in the *TREES Environmental, Social, and Governance Safeguards Guidance Document* (https://www.artredd.org/wp-content/uploads/2021/12/TREES-ESG-Safeguards-Guidance-Document-Oct-2023-eng.pdf).   ***Cancún Safeguard A*** *Actions are complementary or consistent with the objectives of national forest programs and relevant international conventions and agreements*

[14] If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

THEME 1.1 *Consistency with the objectives of national forest programs*
<u>Structural Indicator:</u> Domestic legal framework or policy (or national REDD+ strategy or action plan) for REDD+ actions is clearly defined and designed in consistency with national and if applicable, subnational, forest policies/programs.
<u>Process Indicator:</u> Public institutions have made use of mandates, procedures and resources to ensure REDD+ actions are designed and implemented in consistency with the broader legal or policy framework of the forest sector, and inconsistencies are identified and resolved.
<u>Outcome Indicator:</u> Design and implementation of REDD+ actions have been consistent with or complemented the objectives of the national and if applicable, subnational, forest policies/programs.

THEME 1.2 *Consistency with the objectives of relevant international conventions and agreements*
<u>Structural Indicator:</u> Domestic and if applicable, subnational, legal framework or policy (or national REDD+ strategy or action plan) for REDD+ actions recognize and promote the application of ratified relevant international conventions and agreements in the context of design and implementation of REDD+ actions.
<u>Process Indicator:</u> Public institutions have made use of mandates, procedures, and resources to design and implement REDD+ actions that recognize and promote the application of ratified relevant international conventions and agreements.
<u>Outcome Indicator:</u> Design and implementation of REDD+ actions have been consistent with or has complemented the objectives of identified, ratified and relevant international conventions and agreements.

Cancún Safeguard B
Transparent and effective national forest governance structures, taking into account national legislation and sovereignty

THEME 2.1 *Respect, protect, and fulfill the right of access to information.*
<u>Structural Indicator:</u> Participants have in place a legal framework, policies and/or programs for accessing information related to REDD+ actions in accordance with international human rights standards, and these are anchored in relevant ratified international conventions/agreements and/or domestic and if applicable, subnational, legal framework.
<u>Process Indicator:</u> Public institutions have made use of mandates, procedures, and resources for accessing information related to REDD+ actions in line with relevant ratified international conventions and agreements and/or domestic and if applicable, subnational, legal framework, policies, and programs for accessing information.
<u>Outcome Indicator:</u> The public has been aware of and exercised the right to seek and receive official information on REDD+ actions, as well as on how safeguards have been addressed and respected.

THEME 2.2 *Promote transparency and prevent corruption, including through the promotion of anti-corruption measures.*
<u>Structural Indicator:</u> Participants have in place anti-corruption measures and measures to promote transparency reflecting the principles of rule of law, proper management of public affairs and public property, integrity, transparency, and accountability, and these are anchored in relevant ratified international conventions/agreements and/or domestic and if applicable, subnational, legal framework.
<u>Process Indicator:</u> Public institutions have made use of mandates, procedures, and resources to apply anti-corruption measures and measures to promote transparency in the implementation of REDD+ actions and the distribution of REDD+ benefits, according to relevant ratified international conventions, agreements, and/or domestic and if applicable, subnational, legal frameworks; the measures should reflect principles of the rule of law, proper management of public affairs and public property, integrity, transparency, and accountability.

<u>Outcome Indicator:</u> The distribution of REDD+ benefits related to the implementation of the REDD+ results-based actions have been carried out in a fair, transparent, and accountable manner, as per relevant ratified international conventions, agreements, and/or domestic and if applicable, subnational, legal framework.

THEME 2.3 *Respect, protect, and fulfill land tenure rights.*
<u>Structural Indicator:</u> Participants have in place a legal framework, policies or programs for the recognition, inventorying, mapping, and security of customary and statutory land and resource tenure rights where REDD+ actions are implemented, and these are anchored in relevant ratified international conventions/agreements and/or domestic and if applicable, subnational, legal framework.
<u>Process Indicator:</u> Public institutions have made use of mandates, procedures, and resources to recognize, inventory, map, and secure statutory and customary rights to lands and resources relevant to the implementation of REDD+ actions in line with relevant ratified international conventions, agreements, and/or domestic and if applicable, subnational, legal framework.
<u>Outcome Indicator:</u> Stakeholders had access to, use of, and control over land and resources in line with relevant ratified international conventions, agreements, and/or domestic and if applicable, subnational, legal framework, and no involuntary relocation took place without the free, prior, and informed consent (FPIC) of any indigenous peoples and local communities (or equivalent) concerned.

THEME 2.4 *Respect, protect, and fulfill access to justice.*
<u>Structural Indicator:</u> Participants have in place procedures for guaranteeing non-discriminatory and non-cost prohibitive access to dispute resolution mechanisms at all relevant levels, and these are anchored in relevant ratified international conventions/agreements and/or domestic and if applicable, subnational, legal framework.
<u>Process Indicator:</u> Public institutions have made use of mandates, procedures, and resources to facilitate access to dispute resolution mechanisms for stakeholders involved in the implementation of REDD+ actions including judicial and/or administrative procedures for legal redress, which, inter alia, provide access for indigenous peoples, local communities, or equivalent stakeholders with a recognized legal interest.
<u>Outcome Indicator:</u> Resolved disputes, competing claims, and effective recourse and remedies have been provided when there was a violation of rights, grievance, dispute or claim related to the implementation of REDD+ actions.

Cancún Safeguard C
Respect for the knowledge and rights of indigenous peoples and members of local communities by taking into account relevant international obligations, national circumstances and laws, and noting that the United Nations General Assembly has adopted the United Nations Declaration on the Rights of Indigenous Peoples

THEME 3.1 *Identify indigenous peoples and local communities, or equivalent.*
<u>Structural Indicator:</u> Participants have in place a legal framework, policies or procedures for the identification or self-identification of indigenous peoples, and local communities, or equivalent, and for the respect of their rights, and these are anchored in relevant ratified international conventions/agreements and/or domestic and if applicable, subnational, legal framework.
<u>Process Indicator:</u> Public institutions have made use of mandates, procedures, and resources to respect the rights of the indigenous peoples and local communities, or equivalent in the design and implementation of REDD+ actions, according to relevant ratified international conventions, agreements, and/or domestic and if applicable, subnational, legal framework.
<u>Outcome Indicator:</u> Indigenous peoples and local communities, or equivalent, have been identified and their respective rights have been respected in the design and implementation of REDD+ actions.

THEME 3.2 *Respect and protect traditional knowledge.*

<u>Structural Indicator:</u> Relevant ratified international conventions/agreements, and/or domestic and if applicable, subnational, legal framework define, and provide guidance for respecting and protecting indigenous people's knowledge and/or local communities' knowledge.
<u>Process Indicator:</u> Public institutions have made use of mandates, procedures, and resources to respect and protect indigenous peoples and/or local communities' traditional knowledge in the implementation of REDD+ actions, in line with relevant ratified international conventions, agreements, and/or domestic and if applicable, subnational, legal framework.
<u>Outcome Indicator:</u> Traditional knowledge of indigenous peoples and/or local communities, or equivalent, has been respected and protected in the design and implementation of REDD+ actions where permission for its use has been granted.

***THEME 3.3** Respect, protect, and fulfill rights of indigenous peoples and/or local communities, or equivalent.*
<u>Structural Indicator:</u> Participants have in place legal framework, policies or programs to respect, protect and fulfill human rights of indigenous peoples and local communities, or equivalent, in conformity with customary law, institutions, and practices as applicable and these are anchored in relevant ratified international conventions/agreements and/or domestic and if applicable, subnational, legal framework.
<u>Process Indicator:</u> Public institutions have made use of mandates, procedures, and resources to respect, protect and fulfil rights of indigenous peoples local communities, or equivalent throughout the implementation of the REDD+ actions, according to relevant ratified international conventions, agreements, and/or domestic and if applicable, subnational, legal framework.
<u>Outcome Indicator:</u> Rights of indigenous peoples and local communities, or equivalent, have been identified and respected, protected and fulfilled in the design and implementation of REDD+ actions.

Cancún Safeguard D
The full and effective participation of relevant stakeholders—in particular indigenous peoples and local communities—in actions referred to in paragraphs 70 and 72 of decision 1/CP16

***THEME 4.1.** Respect, protect, and fulfill the right of all relevant stakeholders to participate fully and effectively in the design and implementation of REDD+ actions.*
<u>Structural Indicator:</u> Participants have in place legal frameworks, policies or programs to respect, protect and fulfill the right of all relevant stakeholders to participate fully and effectively, including timely access and culturally appropriate information prior to consultations, and these are anchored in relevant ratified international conventions/agreements and/or domestic and if applicable, subnational, legal framework; access is established to recourse mechanisms to ensure the participation process is respected.
<u>Process Indicator:</u> Public institutions have made use of mandates, procedures, and resources to respect, protect and fulfill the right to full, effective and timely participation in the design and implementation of REDD+ actions, as indicated in relevant ratified international conventions, agreements, and/or domestic and if applicable, subnational, legal framework.
<u>Outcome Indicator:</u> Relevant stakeholders have participated fully, effectively and timely in the design and implementation of REDD+ actions.

***THEME 4.2.** Promote adequate participatory procedures for the meaningful participation of indigenous peoples and local communities, or equivalent.*
<u>Structural Indicator:</u> Relevant ratified international conventions, agreements, and/or domestic legal framework recognizes, respects, and protects the respective rights to participation of indigenous peoples, local communities, or equivalent, through their respective decision-making structures and processes, which requires appropriate procedures take place in a climate of mutual trust.
<u>Process Indicator:</u> Public institutions have made use of mandates, procedures, and resources to promote the meaningful participation of indigenous peoples and local communities, or equivalent in the design, implementation and periodic assessments of REDD+ actions, according to their

respective rights and decision-making structures and processes and to the relevant ratified international conventions, agreements, and/or domestic and if applicable, subnational, legal framework.
Outcome Indicator: *Design, implementation, and periodic assessments of REDD+ actions were, where relevant, undertaken with the participation of indigenous peoples and/or local communities, or equivalent, including if applicable through FPIC, in accordance with relevant international and/or domestic and if applicable, subnational, legal framework, and in accordance with their respective rights and decision-making structures and processes.*

Cancún Safeguard E
That actions are consistent with the conservation of natural forests and biological diversity, ensuring that the actions referred to in paragraph 70 of decision 1/CP16 are not used for the conversion of natural forests, but are instead used to incentivize the protection and conservation of natural forests and their ecosystem services, and to enhance other social and environmental benefits

THEME 5.1 *Non-conversion of natural forests and other natural ecosystems.*
Structural Indicator: *Relevant domestic legal framework, policies and programs consistently define the term natural forests and other natural ecosystems, distinguishing them from plantations, describe the process for mapping the spatial distribution of natural forests and other natural ecosystems, and policies or procedures are in place prohibiting the conversion of natural forests and other natural ecosystems as part of REDD+ actions.*
Process Indicator: *Public institutions have made use of mandates, procedures, and resources to ensure the design and implementation of REDD+ actions considers information of spatial distribution of natural forests and other natural ecosystems and avoids the conversion of these forests and other natural ecosystems, in line with relevant ratified international conventions, agreements, and/or domestic and if applicable, subnational, legal framework, policies and programs.*
Outcome Indicator: *REDD+ actions were designed and implemented avoiding the conversion of natural forests and other natural ecosystems to plantations or other land uses.*

THEME 5.2 *Protect natural forests and other natural ecosystems, biological diversity, and ecosystem services.*
Structural Indicator: *Relevant ratified international conventions, agreements, and/or domestic legal framework or policies identify priorities for the protection and conservation of natural forest areas and natural ecosystems, biodiversity, and ecosystem services, to which REDD+ actions could contribute.*
Process Indicator: *Public institutions have made use of mandates, procedures, and resources to protect and avoid adverse impacts on natural forest areas and natural ecosystems, biodiversity, and ecosystem services in the design and implementation of REDD+ actions, according to relevant ratified international conventions, agreements, and/or domestic legal frameworks, policies and programs.*
Outcome Indicator: *REDD+ actions have promoted the protection of natural forest and other natural ecosystem areas, biodiversity and ecosystem services.*

THEME 5.3 *Enhancement of social and environmental benefits.*
Structural Indicator: *Relevant ratified international conventions, agreements, and/or domestic legal framework, policies and programs regulate the assessment of potential social and environmental benefits of REDD+ actions.*
Process Indicator: *Public institutions have made use of mandates, procedures, and resources to assess social and environmental benefits of REDD+ actions and to promote the enhancement of these benefits in the implementation of these actions, according to relevant ratified international conventions, agreements, and/or domestic and if applicable, subnational, legal frameworks, policies and programs.*

Outcome Indicator: *REDD+ actions have contributed to enhancing social and environmental benefits.*

Cancún Safeguard F
Actions to address the risks of reversals

THEME 6.1 *The risk of reversals is integrated in the design, prioritization, implementation, and periodic assessments of REDD+ polices and measures.*
Process Indicator: *Public institutions have identified and integrated measures to address the risk of reversals in the design, prioritization, implementation, and periodic assessments of REDD+ actions.*
No structure or outcome indicators have been developed for Safeguard F as these issues are broadly addressed by requirements in other sections of the Standard.

Cancún Safeguard G
Actions to reduce displacement of emissions

THEME 7.1 *The risk of displacement of emissions is integrated in the design, prioritization, implementation, and periodic assessments of REDD+ policies and measures.*
Process Indicator: *Public institutions have identified and integrated measures to address the risk of displacement of emissions in the design, prioritization, implementation, and periodic assessments of REDD+ actions.*
No structure or outcome indicators have been developed for Safeguard G as these issues are broadly addressed by requirements in other sections of the Standard.

Part 1, Q13, Criteria: Safeguards system and Do no net harm

Evidence:
Section 3.3 of the *TREES Validation and Verification Standard* specifies the scope of the validation in regard to safeguards (p 13-14):
"Environmental, Social and Governance Safeguards – The VVB evaluates the indicators as follows:

- Structure indicators – The VVB evaluates the description provided in the TREES Registration Document, of the relevant governance arrangements (e.g., policies, laws, and institutional arrangements) that are in place and evaluates whether these can ensure that the implementation of REDD+ actions will be in conformance with the indicator
- Process indicators – The VVB evaluates the description provided TREES Registration Document, of relevant institutional mandates, processes, procedures, and/or mechanisms that are in place and enforced and evaluates whether these can ensure that the implementation of REDD+ actions will be in conformance with the indicator.
- Outcome indicators – For the first five years after the participant joins ART, the VVB evaluates the description provided in the TREES Registration Document to ensure the ART Participant:
- defines the desired context-specific outcome(s); and
- presents an initial plan for collecting monitoring information that can demonstrate outcomes starting within five years of the Participant joining ART or sooner

For all subsequent years, the VVB validates the description provided in the TREES Registration Document to ensure the ART Participant:

- defines the Participant-defined context-specific outcome(s), including any justified adjustments since previous crediting periods; and
- presents a plan, including any justified adjustments since previous crediting periods, for ongoing collection of monitoring information that will demonstrate stepwise improvements in achieving Participant-defined context-specific outcomes"

Section 3.4 of the *TREES Validation and Verification Standard* specifies the scope of the verification in regard to safeguards (p 15-16):
"Environmental, Social and Governance Safeguards – The VVB evaluates the indicators as follows:

- Structure indicators – The VVB evaluates whether the evidence provided by a Participant demonstrates that the relevant governance arrangements (e.g., policies, laws, and institutional arrangements) were in place, ensuring that the implementation of REDD+ actions was in conformance with the indicator.
- Process indicators – The VVB evaluates whether the evidence provided by a Participant demonstrates that the relevant institutional mandates, processes, procedures, and/or mechanisms were in place and enforced, ensuring that the implementation of REDD+ actions was in conformance with the indicator. .
- Outcome indicators –

For the first five years after joining ART, the VVB evaluates whether the evidence provided by a Participant

- demonstrates that the initial plan for monitoring the Participant-defined context-specific outcome(s) outlined in the TREES Registration Document has been implemented, fully or in part; or
- demonstrates that the ART Participant has concluded development of its outcome monitoring plan by the end of five years after joining ART and is ready to implement the plan.

For all subsequent years, the VVB evaluates whether the evidence provided by a Participant

- demonstrates that the outcome monitoring plan defined by the ART Participant is being implemented, together with any identified and justified changes to the monitoring plan originally outlined in the TREES Registration Document; and
- demonstrates that ongoing collection of monitoring information shows stepwise improvements in Participant-defined context-specific outcomes in summarized results reporting."

Section 3.6.3.4 of the *TREES Validation and Verification Standard* (p 17-18, emphasis added):
"Major Nonconformance – A nonconformance that:

1. Has a material impact on the ERRs claimed by the ART Participant,
2. Is a systems issue that could result in a material impact on the ERRs in the future, or
3. Is a systemic issue that affects the ART Participant's ability to conform with the requirements of TREES, including eligibility **and safeguards requirements**.

A major nonconformance **must be resolved prior to a positive verification opinion** being issued by the VVB. All major nonconformances and resolutions must be listed in the validation or verification report."

Part 1, Q18, Criterion: Sustainable development criteria

Evidence:
Section 12.3 of *TREES 2.0* (p 56): "Participants must always report on conformance with all Cancún Safeguards and, in accordance to the step-wise nature of REDD+ implementation, will report in a progressive manner through indicators established for each theme. At the start of the first crediting period, Participants must demonstrate conformance with Cancún Safeguards by reporting against all structure and process indicators. In addition, at the beginning of the first crediting period, Participants must either demonstrate conformance with the outcome indicators or present a plan for achieving conformance with the outcome indicators by the end of five years from the time the Participant joined ART.
Within five years of joining ART, Participants must demonstrate conformance with all structure, process and outcome indicators under all themes under each of the Cancún Safeguards."

Section 3.6.3.4 of the *TREES Validation and Verification Standard* (p 17-18, emphasis added): "Major Nonconformance – A nonconformance that: 1. Has a material impact on the ERRs claimed by the ART Participant, 2. Is a systems issue that could result in a material impact on the ERRs in the future, or 3. Is a systemic issue that affects the ART Participant's ability to conform with the requirements of TREES, including eligibility **and safeguards requirements**. A major nonconformance **must be resolved prior to a positive verification opinion** being issued by the VVB. All major nonconformances and resolutions must be listed in the validation or verification report."
e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:
The information provided in "d." has been changed to reflect the updated safeguards requirements as follows: **Summary:** From Section 12.2 (p. 74-75) of *TREES 3.0*: "There are three types of indicators: Structure— demonstrate the relevant governance arrangements (e.g., policies, laws, and institutional arrangements) are in place in the country and applicable jurisdiction for the case of subnational Participants that align the implementation of REDD+ activities with the Cancún Safeguards; Process— demonstrate that relevant institutional mandates, as well as processes, procedures, resources and/or mechanisms that are in place and enforced in the country for the implementation of REDD+ activities are consistent with the Cancún Safeguards; and Outcome— demonstrate the context-specific desired results that have been achieved throughout the REDD+ activities and safeguard actions. Due to the highly related nature of the Structure and Process indicators, Section 12.4 combines the Structure and Process indicators into one indicator, so Participants shall report on these together." From Section 12.3 (p. 75-76) of *TREES 3.0*: "Participants shall report on conformance with all Cancún Safeguards and, in accordance with the stepwise nature of REDD+ implementation, will report in a progressive manner through indicators established for each theme. In their TREES Registration Document, Participants shall report and demonstrate conformance with all structure and process indicators. In addition, for the outcome indicators, Participants shall: • Demonstrate how any REDD+ activities that occurred prior to the start of the crediting period but are relevant to the reporting period such as consultations, agreements, REDD+ plan design, etc. were developed and implemented in conformance with the outcome indicator and describe how the information was collected. • Describe the context-specific desired results for any REDD+ activities that will occur during the crediting period to demonstrate conformance with the outcome indicator and how this information will be collected and reviewed. If some activities such as consultations, agreements, etc. occurring after the crediting period are needed or relevant to demonstrate conformance with TREES requirements during the crediting period, these shall be listed too and their expected results described. In their TREES Monitoring Report, Participants shall report any changes to the information in the TREES Registration Document regarding the structure and process indicators that occurred during

the reporting period. If no changes have occurred, the Participant shall note this. For the outcome indicators, Participants shall:

- Provide a brief summary of how conformance has been demonstrated previously. The Participant shall note and explain if no new activities were required during the reporting period to maintain conformance with the indicator.
- Describe how the context-specific desired results outlined in the TRD that were expected for the reporting period were achieved, providing a summary of the information and data that was collected through the Participant's monitoring system and the means of verification. The Participant shall note any changes to the monitoring that occurred. The Participant shall also note any changes to either REDD+ activities or the outcome monitoring that are planned for the future as a result of the review of this information.
- Describe other context-specific results achieved, monitoring approaches used, and information collected for any REDD+ activities that were new or changed during the reporting period and were not included in the TREES Registration Document."

Evidence:
Section 12 of *TREES 3.0* (p. 74-82) describes the safeguards under TREES. The safeguards themselves (Section 12.4, p 76-82) are copied below.

Cancun Safeguard A
THEME 1.1 Consistency with the objectives of national forest programs.
Structure and Process Indicator: Participants have a clearly defined domestic legal framework, policies, or programs (or national REDD+ strategy or action plan) as well as the necessary procedures, resources and mechanisms for REDD+ activities to be designed in consistency with national and if applicable, subnational, forest policies/programs.
Outcome Indicator: Public institutions have designed and implemented REDD+ activities consistent with or complementary to the objectives of the national and if applicable, subnational, forest policies/programs.

Theme 1.2 Consistency with the objectives of relevant international conventions and agreements.
Structure and Process Indicator: Participants have a domestic and if applicable, subnational, legal framework, policies, or programs (or national REDD+ strategy or action plan) as well as the necessary procedures, resources and mechanisms to recognize and promote the application of ratified relevant international conventions and agreements in the design and implementation of REDD+ activities.
Outcome Indicator: Public institutions have designed and implemented REDD+ activities consistent with or complementary to the objectives of identified, ratified and relevant international conventions and agreements.

Cancun Safeguard B
Theme 2.1 Respect, protect, and fulfill the right of access to information.
Structure and Process Indicator: Participants have in place a legal framework, policies and/or programs as well as the necessary procedures, resources and mechanisms for providing access to information related to REDD+ activities, REDD+ benefit distribution, and how safeguards have been addressed and respected.
Outcome Indicator: Public institutions have provided access to information, and the public has been aware of and exercised the right to seek and receive official information on REDD+ activities and REDD+ benefit distribution as well as on how safeguards have been addressed and respected.

Theme 2.2 Promote transparency and prevent corruption, including through the promotion of anti-corruption measures.
Structure and Process Indicator: Participants have in place a legal framework, policies and/or programs as well as the necessary procedures, resources and mechanisms to prevent corruption,

promote anti-corruption measures, and promote transparency in the REDD+ activities and the distribution of REDD+ benefits. These reflect the principles of rule of law, proper management of public affairs and public property, and integrity.
Outcome Indicator: Public institutions have carried out REDD+ activities and the distribution of REDD+ benefits in a transparent and accountable manner, preventing corruption.

Theme 2.3 Respect, protect, and fulfill land tenure rights.
Structure and Process Indicator: Participants have in place a legal framework, policies, or programs as well as the necessary procedures, resources and mechanisms for the recognition, inventorying, mapping, and security of customary and statutory land and resource tenure rights relevant to the implementation of the REDD+ activities.
Outcome Indicator: Public institutions have recognized, inventoried, mapped, and secured customary and statutory land and resource tenure rights relevant to the implementation of REDD+ activities and respected stakeholders' rights of access to, use of, and control over land and resources throughout the implementation of REDD+ activities. REDD+ activities have not caused any relocation without the Free, Prior, and Informed Consent (FPIC) of any Indigenous Peoples, Local Communities, Afro-descendant Peoples or equivalent stakeholders. REDD+ activities have not affected the rights to lands, resources and livelihoods without the Free, Prior, and Informed Consent (FPIC) of any Indigenous Peoples, Local Communities, Afro-descendant Peoples or equivalent stakeholders, as applicable.

Theme 2.4 Respect, protect, and fulfill access to justice.
Structure and Process Indicator: Participants have in place a legal framework, policies or programs and the necessary procedures, resources and mechanisms for guaranteeing non-discriminatory and non-cost prohibitive dispute resolution mechanisms at all relevant levels for stakeholders involved in the implementation of and/or with a recognized legal interest in the REDD+ activities, including judicial and/or administrative procedures for legal redress, which, among other things, provide access for Indigenous Peoples, Local Communities, Afro-descendant Peoples or equivalent stakeholders.
Outcome Indicator: Public institutions have resolved disputes and competing claims and provided effective recourse and remedies through non-cost prohibitive and non-discriminatory mechanisms when there was a violation of rights, grievance, dispute or claim related to the implementation of REDD+ activities. All REDD+ related dispute resolution mechanisms have been transparently and proactively communicated to stakeholders, and the disputes resolution progress is being monitored to inform evaluation and improvement processes.

Cancun Safeguard C
Theme 3.1 Identify indigenous peoples and local communities, or equivalent.
Structure and Process Indicator: Participants have in place a legal framework, policies, or programs as well as the necessary procedures, resources and mechanisms for the identification or self-identification of Indigenous Peoples, Local Communities, Af-descendant Peoples or equivalent, including Indigenous Peoples in Voluntary Isolation and Initial Contact and transhumant communities.
Outcome Indicator: Public institutions have identified Indigenous Peoples, Local Communities, and Afro-descendant Peoples, or equivalent, including Indigenous Peoples in Voluntary Isolation and Initial Contact and transhumant communities, living and/or using forest resources in the REDD+ accounting area.

Theme 3.2 Respect and protect traditional knowledge and practices.
Structure and Process Indicator: Participants have in place a legal framework, policies, programs as well as the necessary procedures, resources and mechanisms to respect and protect the traditional knowledge and practices of Indigenous Peoples, Local Communities, Afro-descendant Peoples or equivalent (including those of Indigenous Peoples in Voluntary Isolation and Initial Contact and transhumant communities) in the implementation of REDD+ activities.

Outcome Indicator: Public institutions have respected and protected the traditional knowledge and practices of Indigenous Peoples, Local Communities, Afro-descendant Peoples or equivalent, including those of Indigenous Peoples in Voluntary Isolation and Initial Contact and transhumant communities, in the design and implementation of REDD+ activities.

Theme 3.3 Respect, protect, and fulfill rights of Indigenous Peoples, Local Communities, and Afro-descendant Peoples, or equivalent.
Structure and Process Indicator: Participants have in place a legal framework, policies or programs as well as the necessary procedures, resources and mechanisms to respect, protect and fulfill the human rights of Indigenous Peoples, Local Communities and Afro-descendant Peoples, or equivalent (including Indigenous Peoples in Voluntary Isolation and Initial Contact and transhumant communities), in conformity with customary law, institutions, and practices, throughout the design and implementation of REDD+ activities and REDD+ benefit distribution.
Outcome Indicator: Public institutions have respected, protected and fulfilled the rights of Indigenous Peoples, Local Communities and Afro-descendant Peoples, or equivalent (including Indigenous Peoples in Voluntary Isolation and Initial Contact and transhumant communities) in the design and implementation of REDD+ activities and REDD+ benefit distribution, including applicable rights to Free, Prior, and Informed Consent (FPIC) for any REDD+ activity that could affect their rights to lands, resources and livelihoods.

Cancun Safeguard D
Theme 4.1. Respect, protect, and fulfill the right of all relevant stakeholders to participate fully and effectively in the design and implementation of REDD+ activities.
Structure and Process Indicator: Participants have in place a legal framework, policies or programs as well as the necessary procedures, resources and mechanisms to respect, protect and fulfill the right of all relevant stakeholders, including women, youth and vulnerable groups, to participate fully and effectively (including timely access to information prior to consultations and access to recourse mechanisms to ensure the participation process is respected) in the design and implementation of REDD+ activities as well as in the decisions about the distribution of REDD+ benefits.
Outcome Indicator: Public institutions have respected, protected and fulfilled the right of all relevant stakeholders, including women, youth and vulnerable groups, to participate fully and effectively in the design and implementation of REDD+ activities and decisions about the distribution of REDD+ benefits.

Theme 4.2. Develop adequate participatory procedures for the effective participation of Indigenous Peoples, Local Communities and Afro-descendant Peoples, or equivalent.
Structure and Process Indicator: Participants have in place a legal framework, policies or programs as well as the necessary procedures, resources and mechanisms to guarantee that the participation of Indigenous Peoples, Local Communities, Afro-descendant Peoples or equivalent in the design and implementation of REDD+ activities as well as in the decisions about the distribution of REDD+ benefits occurs through their respective decision-making structures and processes[23], ensuring adequate conditions for their participation and using culturally appropriate procedures.
Outcome Indicator: Public institutions have guaranteed that the participation of Indigenous Peoples, Local Communities, Afro-descendant Peoples or equivalent in the design and implementation of REDD+ activities as well as in the decisions about the distribution of REDD+ benefits occurred through their respective decision-making structures and processes, ensuring adequate conditions for their participation and using culturally appropriate procedures.

Cancun Safeguard E
Theme 5.1 Non-conversion of natural forests and other natural ecosystems.
Structure and Process Indicator: Participants have in place a legal framework, policies or programs as well as the necessary procedures, resources and mechanisms to define the term natural forests and other natural ecosystems, distinguishing them from plantations, map the spatial distribution of

natural forests and other natural ecosystems, and prevent REDD+ activities from resulting in the conversion of natural forests and other natural ecosystems.
Outcome Indicator: Public institutions have designed and implemented REDD+ activities without the conversion of natural forests and other natural ecosystems to plantations or other land uses.

Theme 5.2 Protect natural forests and other natural ecosystems, biological diversity, and ecosystem services and enhance environmental benefits.
Structure and Process Indicator: Participants have in place a legal framework, policies or programs as well as the necessary procedures, resources and mechanisms to ensure that REDD+ activities are designed and implemented to protect and conserve natural forests and other natural ecosystems, biodiversity, and ecosystem services, enhance their environmental benefits, and avoid adverse effects on them.
Outcome Indicator: Public institutions have designed and implemented the REDD+ activities to protect and conserve natural forests and other natural ecosystems, biodiversity, and ecosystem services, enhance their environmental benefits, and avoid adverse effects on them.

Theme 5.3 Enhancement of social benefits.
Structure and Process Indicator: Participants have in place a legal framework, policies or programs as well as the necessary procedures, resources and mechanisms to enhance the social benefits of REDD+ activities and the distribution of REDD+ benefits and ensure that women, youth and vulnerable groups can also benefit from the REDD+ activities and the distribution of REDD+ benefits.
Outcome Indicator: Public institutions have designed and implemented the REDD+ activities and the distribution of REDD+ benefits to enhance social benefits and ensure that women, youth and vulnerable groups also benefit from the REDD+ activities and the distribution of REDD+ benefits.

Cancun Safeguard F
Theme 6.1 The risk of reversals is integrated in the design, prioritization, implementation, and periodic assessments of REDD+ policies and measures.[24]
Process Indicator: Public institutions have identified and integrated measures to address the risk of reversals in the design, prioritization, implementation, and periodic assessments of REDD+ activities.

No structure or outcome indicators have been developed for Safeguard F as these issues are broadly addressed by requirements in other sections of the Standard.

Cancun Safeguard G
Theme 7.1 The risk of displacement of emissions is integrated in the design, prioritization, implementation, and periodic assessments of REDD+ policies and measures.
Process Indicator: Public institutions have identified and integrated measures to address the risk of displacement of emissions in the design, prioritization, implementation, and periodic assessments of REDD+ activities.

No structure or outcome indicators have been developed for Safeguard G as these issues are broadly addressed by requirements in other sections of the Standard.

Part 1, Q13, Criteria: Safeguards system and Do no net harm

Evidence:
Section 3.5 of the *TREES Validation and Verification Standard, Version 3.0* specifies the scope of the validation in regard to safeguards in *TREES 3.0* (p 22):

- "Environmental, Social and Governance Safeguards – The VVB evaluates the indicators as follows:

- Structure and Process indicators – The VVB evaluates whether the relevant governance arrangements (e.g., policies, laws, and institutional arrangements), procedures, resources and/or mechanisms described in the TREES Registration Document are in place and operationalized and evaluates whether these can ensure that the implementation of REDD+ activities will be in conformance with the outcome indicator.
- Outcome indicators: The VVB evaluates whether the information provided in the TREES Registration Document is complete and demonstrates how the Participant meets the relevant requirements of TREES 3.0 Section 12.3 for all REDD+ activities"

Section 3.6 of the *TREES Validation and Verification Standard, Version 3.0* specifies the scope of the verification in regard to safeguards for *TREES 3.0* (p 24):

- "Environmental, Social and Governance Safeguards – The VVB evaluates the indicators as follows:
  - Structure and Process Indicators: The VVB evaluates if the Participant has accurately reported any changes to the information in the TREES Registration Document regarding the structure and process indicators that occurred during the reporting period and whether the changes affect conformance with the indicators. The VVB also verifies if all the elements listed in the TRD and in the TMR were in place and operationalized during the reporting period.
  - Outcome Indicators: The VVB evaluates if the information in the TMR is complete and demonstrates how the Participant meets the relevant requirements of TREES 3.0 Section 12.3 for all REDD+ activities. The VVB also verifies that the achieved context-specific results demonstrate conformance with the requirement of the outcome indicator."

Section 3.8.3.4 of the *TREES Validation and Verification Standard, Version 3.0* (p 27, emphasis added):
"Major Nonconformance – A nonconformance that:
1. Has a material impact on the ERRs claimed by the ART Participant,
2. Is a systems issue that could result in a material impact on the ERRs in the future, or
3. Is a systemic issue that affects the ART Participant's ability to conform with the eligibility requirements of TREES, or
4. Is a widespread or repeated system failure representing the absence or complete ineffectiveness of a required safeguard structure or process, or where the actual or potential impacts materially compromise the achievement of a TREES Safeguards outcome indicator, or
5. Represents a significant documentation issue regarding safeguards and as a result, conformance with a safeguard indicator is not sufficiently demonstrated in the TRD or TMR.

A major nonconformance **must be resolved prior to a positive verification opinion being issued** by the VVB. All major nonconformances and resolutions must be listed in the validation or verification report."

Part 1, Q18, Criterion: Sustainable development criteria

Evidence:
From Section 12.3 (p. 75-76) of *TREES 3.0*:

"Participants shall report on conformance with all Cancún Safeguards and, in accordance with the stepwise nature of REDD+ implementation, will report in a progressive manner through indicators established for each theme.

In their TREES Registration Document, Participants shall report and demonstrate conformance with all structure and process indicators. In addition, for the outcome indicators, Participants shall:

- Demonstrate how any REDD+ activities that occurred prior to the start of the crediting period but are relevant to the reporting period such as consultations, agreements, REDD+ plan design, etc. were developed and implemented in conformance with the outcome indicator and describe how the information was collected.
- Describe the context-specific desired results for any REDD+ activities that will occur during the crediting period to demonstrate conformance with the outcome indicator and how this information will be collected and reviewed. If some activities such as consultations, agreements, etc. occurring after the crediting period are needed or relevant to demonstrate conformance with TREES requirements during the crediting period, these shall be listed too and their expected results described.

In their TREES Monitoring Report, Participants shall report any changes to the information in the TREES Registration Document regarding the structure and process indicators that occurred during the reporting period. If no changes have occurred, the Participant shall note this. For the outcome indicators, Participants shall:

- Provide a brief summary of how conformance has been demonstrated previously. The Participant shall note and explain if no new activities were required during the reporting period to maintain conformance with the indicator.
- Describe how the context-specific desired results outlined in the TRD that were expected for the reporting period were achieved, providing a summary of the information and data that was collected through the Participant's monitoring system and the means of verification. The Participant shall note any changes to the monitoring that occurred. The Participant shall also note any changes to either REDD+ activities or the outcome monitoring that are planned for the future as a result of the review of this information.
- Describe other context-specific results achieved, monitoring approaches used, and information collected for any REDD+ activities that were new or changed during the reporting period and were not included in the TREES Registration Document."

Section 3.8.3.4 of the *TREES Validation and Verification Standard, Version 3.0* (p 27, emphasis added):

"<u>Major Nonconformance</u> – A nonconformance that:

1. Has a material impact on the ERRs claimed by the ART Participant,
2. Is a systems issue that could result in a material impact on the ERRs in the future, or
3. Is a systemic issue that affects the ART Participant's ability to conform with the eligibility requirements of TREES, or
4. Is a widespread or repeated system failure representing the absence or complete ineffectiveness of a required safeguard structure or process, or where the actual or potential impacts materially compromise the achievement of a TREES Safeguards outcome indicator, or
5. Represents a significant documentation issue regarding safeguards and as a result, conformance with a safeguard indicator is not sufficiently demonstrated in the TRD or TMR.

A major nonconformance **must be resolved prior to a positive verification opinion being issued** by the VVB. All major nonconformances and resolutions must be listed in the validation or verification report."

CHANGE 12
a. Description of the change (e.g., the addition, modification, deletion undertaken):
TREES 3.0 has a revised complaints and appeals process. The updated process clarifies the processes to properly address different types of complaints, requires reviewers and investigators to be independent of ART and Winrock, revises eligibility and the submission process, and updates the steps and timelines for review.
b. Rationale for the change:
The process was modified in response to stakeholder feedback.
c. Where the change is reflected in the Programme's documentation or other resource(s)[15]:
The revised Complaints and Appeals process is detailed in Section 16 (p. 89-91) of [TREES 3.0].
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:
References to complaints and appeals, as related to changes noted above, were included in the March 2025 Second Compliance Period (2027-2029) Phase Application, including: *Part 1, Q2, Criterion: Programme governance* **Summary:** Complaints and appeals are handled in line with the process outlined in TREES and in the guidance document. **Evidence:** The complaint and appeal process is outlined in *TREES 2.0* Section 16 (pgs 70-71): "16.1 COMPLAINTS All complaints relating to validation and verification should be directed to and resolved through the Validation and Verification Body's complaints and appeals procedure. When a Participant or stakeholder objects to a decision made by ART representatives or the application of the ART program requirements, the following confidential complaint procedure shall be followed: [redacted] 16.2 APPEALS If a complaint remains unresolved after the conclusion of the complaint procedure, a Participant or stakeholder may appeal any such decision or outcome reached. The following confidential appeals procedure shall be followed: [redacted]

[15] If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

[redacted] Additional guidance on the complaint and appeal process is located publicly on the ART website at https://www.artredd.org/wp-content/uploads/2023/05/ART-Complaints-Guidance-May-2023-Final.pdf
e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:
The information provided in "d." has been changed to reflect the revised TREES Complaints and Appeals process as follows: *Part 1, Q2, Criterion: Programme governance* **Summary:** Complaints and appeals are handled in line with the process outlined in TREES. **Evidence:** The complaint and appeal process is outlined in *TREES 3.0* Section 16 (pgs 89-91): "16. COMPLAINTS AND APPEALS 16.1 SCOPE The TREES Complaints and Appeals procedure is for reporting instances in which the processes required by ART have not been followed, resulting in harm to stakeholders living and/or using forest resources in the REDD+ accounting area. Other types of complaints or grievances including grievances related to the design and/or implementation of a Participating jurisdiction's REDD+ Program or complaints regarding the conduct or decisions of the Validation and Verification Body should be directed to the appropriate process to ensure proper investigation and resolution as outlined below. Complaints regarding a Participant's REDD+ program, including participatory processes, distribution of benefits, activities or communities included in the program, access to information, FPIC or any topic related to the design and implementation of the REDD+ program should be directed to the appropriate dispute resolution mechanism in the jurisdiction. As required by Section 12, non-discriminatory and non-cost prohibitive dispute resolution mechanisms must be in place, and these mechanisms must provide effective recourse and remedies in the case of a violation of rights, grievance, dispute or claim related to the implementation of REDD+ activities. Stakeholders may also submit comments on any aspect of a jurisdiction's program as part of the public comment process as described in Section 2.6.2.

If the Complainant does not feel the jurisdiction's dispute resolution mechanisms are effective, they should report this concern to the Validation and Verification Body during the validation and verification process or to ART as part of the public comment process as described in Section 2.6.2. Validation and Verification Bodies will use the information provided in their audit planning and as evidence in their assessment of the Participant's conformance with the requirements of TREES. Complaints on the conduct or decisions of the Validation and Verification Body can be reported to ART or to the Validation and Verification Body through its complaint process. If reported to ART, ART will forward the complaint to the VVB and, if appropriate, to the appropriate IAF accreditation member to be addressed through their process. ART will also take the complaint into account as part of the Validation and Verification Body oversight process as described in Section 2.5 of the TREES Validation and Verification Standard, but this will not be addressed through the TREES Complaint and Appeal process.

16.2 COMPLAINTS

Complaints must meet the following requirements to be considered eligible:

- Complainants must be either a) one or more individuals or communities who live and/or use forest resources in the REDD+ accounting area, or that have been relocated from the accounting area, or b) an ART Participant.
- Complainant must document harm or imminent pending harm from ART's failure to follow its processes.
- If a Complainant is a representative organization, it must include the names of the individual or individuals being harmed and their consent to be represented by the organization in this matter.
- The complaint must represent a new issue not associated with a previous complaint.

To submit a complaint, the Complainant sends a written complaint in any language via email to ARTComplaints@winrock.org. The complaint must detail the following:

1. Description of the eligible complaint with specific reference to TREES requirements that were not followed;
2. Complainant name, contact details, and organization;
3. Description of the harm or imminent harm to the Complainant; and
4. Supporting documentation provided for consideration by the reviewer in the complaint resolution process, if appropriate.

In instances where a Complainant wishes to remain anonymous from the ART Participant or other external stakeholders, ART shall make appropriate accommodation providing that the identity of the Complainant must be made known to ART and to the reviewer.

The ART Secretariat will maintain a list of qualified individuals not employed by ART or Winrock who may be called upon to review any complaint received. ART will select a reviewer based on availability and the nature of the complaint.

If a complaint is received, the ART Secretariat will acknowledge receipt to the Complainant and then appoint an external reviewer to evaluate whether the complaint meets the eligibility criteria. The reviewer will notify the complainant of the eligibility decision within 20 business days of being appointed.

If the complaint is eligible, a qualified reviewer will investigate the complaint. The investigation may include interviews with relevant stakeholders, a review of documents and information, and/or consultation with external experts as needed. All involved stakeholders, including ART, the VVB, the reviewer, and the Complainant and named individuals, will be required to sign Non-Disclosure Agreements limited to the term of the complaint review process to ensure the review process remains objective and uninfluenced by outside parties. The reviewer will submit a report

summarizing the investigation and their conclusion to the ERT Board. Following the ERT Board review, the reviewer will share a copy of the report with the ART Secretariat and the Complainant. If appropriate, the ART Secretariat will develop corrective and preventive actions to address the findings of the reviewer. All eligible complaints and the outcome of the complaint review process will be published on the ART website once the review process is complete, subject to appropriate redacting of information requested to remain anonymous. 16.3 APPEALS If within 30 days of the receipt of the reviewer's Complaint Report, the Complainant obtains evidence not previously considered during the Complaint process that would reasonably be expected to have impacted the decision, the Complainant may file an appeal including the evidence that was not considered. An appeal may not be filed only to dispute the outcome and must be filed by the same organization and affected individuals that filed the Complaint. To file an appeal, the Complainant sends a written appeal via email to ARTComplaints@winrock.org. The appeal must provide a detailed description of the appeal with specific reference to evidence that was not considered during the complaint review process. In instances where a Complainant wishes to remain anonymous from the ART Participant or other external stakeholders, ART shall make appropriate accommodation providing that the identity of the Complainant must be made known to ART and to the reviewer. If an appeal is received, the ART Secretariat will acknowledge receipt to the Complainant and then appoint an external reviewer based on availability and the nature of the appeal. The reviewer will evaluate whether the appeal meets the eligibility criteria and will notify the complainant of the eligibility decision within 20 business days of being appointed. The reviewer for the appeal will be a different individual than reviewed the complaint. If the appeal is eligible, a qualified reviewer will investigate the appeal. The investigation may include interviews with relevant stakeholders, a review of documents and information, and/or consultation with external experts as needed. All involved stakeholders, including ART, the VVB, the reviewer, and the Complainant and named individuals, will be required to sign Non-Disclosure Agreements limited to the term of the appeal review process to ensure the review process remains objective and uninfluenced by outside parties. The reviewer will submit a report summarizing the investigation and their conclusion to the ERT Board. Following the ERT Board review, the reviewer will share a copy of the report with the ART Secretariat and the Complainant. If appropriate, the ART Secretariat will develop corrective and preventive actions to address the findings of the reviewer. The conclusion of the appeal reviewer will be considered final and subsequent appeals will not be accepted. All eligible appeals and the outcome of the appeal review process will be published on the ART website once the review process is complete, subject to appropriate redacting of information requested to remain anonymous."

CHANGE 13
a. Description of the change (e.g., the addition, modification, deletion undertaken):

TREES 3.0 has updated elements of Annex A: Requirements for Avoiding Double Counting with ICAO's CORSIA (previously Annex B of TREES 2.0) and Section 13: Avoiding Double Counting.
b. Rationale for the change:
These updates were made to more closely align with relevant decisions by The Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA), including direct reference to the required elements of a Letter of Authorization, and to explicitly reference the checklist in the ICAO Guidelines Section III.2 Table 3.
c. Where the change is reflected in the Programme's documentation or other resource(s)[16]:
The Requirements for Avoiding Double Counting with ICAO's CORSIA are located in Annex A (pg. 100-107) of TREES 3.0. The provisions for Avoiding Double Counting are located in Section 13 (pg 83-85) of TREES 3.0.
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:
References to avoiding double counting, as related to changes noted above, were included in the March 2025 Second Compliance Period (2027-2029) Phase Application, including: *Part 5, Q1, Criteria: Avoidance of Double Counting, Issuance and Claiming* and *Are only counted once towards a mitigation obligation* **Evidence:** a) and b) Section 13.1 (pg 65) of TREES 2.0 states: "Double issuance occurs when more than one unique unit is issued for a single ERR, within the same program/registry or when more than one program/registry issues unique units for a single ERR. To mitigate the risk of double issuance, TREES requires the disclosure of any verified or issued emission reductions in the same accounting area, including credits from projects, which will be deducted from TREES issuance volume, checks of duplicate registration under other programs (including offset programs) and requirements for disclosure of other registrations, as well as for cancellation of the units on one registry prior to re-issuance on another." … c) and d) … Section 13.3 (pg 66) of TREES 2.0 states: "Double claiming occurs when the same ERR is used by two or more entities (e.g. Parties to the Paris Agreement, aeroplane operators under CORSIA, corporate voluntary buyers) to meet climate change mitigation obligations, targets, pledges, commitments or efforts, including international transfers under the Paris Agreement towards achievement of Nationally Determined Contributions (NDCs) and transfers for use by aeroplane operators under the ICAO CORSIA, or when voluntary market transfers are counted toward both corporate buyer pledges and supplier country NDCs. ART Participants may authorize transfers of TREES Credits for compliance purposes to buyers outside of the Participant's country by submitting a Host Country Letter of Authorization to ART and subsequently applying an accounting adjustment in biennial transparency reports to the UNFCCC. At present, voluntary market transactions do not require corresponding adjustments…" *Part 5, Q2, Criteria: Avoidance of Double Counting, Issuance and Claiming* and *Are only counted once towards a mitigation obligation* **Evidence**: [see response to Part 5, Q1, c) and d) above]

[16] If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

and
"Annex B (pg 85-91) of TREES 2.0 provides further details regarding requirements for avoiding double counting with ICAO's CORSIA. Notably, section B.2 (pg 87) of Annex B details the functionality features of the ART Registry that enable the avoidance of double counting in all its forms…"
and
"Section B.3 (pg 88-91) of Annex B explicitly lists ART's requirements for avoiding double counting in CORSIA: "To avoid double claiming with progress towards mitigation targets pledged by countries in their Paris Agreement Nationally Determined Contributions (NDCs) and emission reduction and removal units used for the CORSIA, TREES requires in 13.3 II that countries authorize the use of offset credits by aeroplane operators under the CORSIA and provide a letter of assurance and authorization that they will report the use to the UNFCCC in the structured summary of its biennial transparency reports and make corresponding accounting adjustments."

Part 5, Q4, Criteria: Avoidance of Double Counting, Issuance and Claiming and *Are only counted once towards a mitigation obligation*

Evidence:
The sample host country letter of assurance and authorization provided as Exhibit 1 in Annex B (pg 91) of TREES 2.0 guides the content in host-country attestations. The letter includes identification of:

i) national point of contact = "UNFCCC Focal Point, Government of Country X"

ii) authorized unit vintages = "We authorize only the use of the program's emission reductions / removals, for which ART has issued or will issue offset credits, that occur in the period from [DATE] to [DATE]; and We authorize only the use of a maximum of [#] tCO2e of the program's emission reductions / removals, issued as offset credits by ART, for each calendar year."

iii) authorized activity types = "With regard to REDD+ program X, as described in the documentation attached to this letter, we hereby acknowledge that the program may reduce greenhouse gas emissions and enhance removals in country Y and that the Architecture for REDD+ Transactions (ART) has issues, or intends to issue, offset credits for these emission reductions / removals."

iv) the CORSIA compliance period for which the units are authorized = ART does not specifically require that the authorization letter state the CORSIA compliance period for which the units are authorized. This is because TREES 2.0 was published in mid-2021, and at that time (and currently), the authorization requirements were only applicable in practice to the 2024-2026 compliance period (given that there was an ample supply of pre-2020 vintage credits for the 2021-2023 compliance period). However, any restrictions on use could be included by the host country.

v) expected timing and processes for applying and reporting adjustments = ART does not specifically require this as part of the template because of the date of the template's design as noted previously. However, in practice ART does require this. The expected timing and process for applying the adjustments will be informed by the definition of first transfer. For example, in the case of first transfer on authorization, the timing for applying the adjustments is immediately upon authorization (as reported to the UNFCCC in an initial report, as published on the CARP) and for reporting the adjustments is in the next annual report (as published on the CARP) and Bienniel Transparency Report (BTR) submitted to the UNFCCC.
For example, please see Guyana's RP3 Host Country Letter of Authorization publicly posted on the ART Registry.
https://art.apx.com/mymodule/reg/TabDocuments.asp?r=111&ad=Prpt&act=update&type=PRO&aProj=pub&tablename=doc&id1=102

vi) country's chosen accounting method = While ART does not specifically require the host country authorization letter to state its chosen accounting method for the Application of Corresponding Adjustments consistent with 2/CMA.3 Annex I, this information is included in the Article 6, Paragraph 2 Initial Report (AIR) Referred to in Decision 2/CMA.3, Annex, Chapter IV.A (Initial Report) in Respect of Authorisation of ITMOs. The AIR Section 4 includes information on ITMO metrics, method for applying corresponding adjustments and method for quantification of the NDC (para. 18(c–f)). See example AIR from Guyana, which was reviewed by ART as one requirement to labelling TREES Credits as CORSIA Eligible:
https://www4.unfccc.int/sites/SubmissionsStaging/Documents/202402221554---Guyana_Initial%20Report_Feb%202024%20Final.pdf?_gl=1*ynib4v*_ga*MTAzODE1MTAyMC4xNzM5MjE3MDU5*_ga_7ZZWT14N79*MTc0MjM0NjM4MS4xNy4xLjE3NDIzNDY2MjUuMC4wLjA.#page=7

This is a sample letter, and countries may submit their own versions, provided the letters explicitly provide the following, which is stated in Section B.3 of Annex B (pg 88-89) of TREES 2.0:
"The Host Country Letter of Assurance and Authorization. The letter will be obtained from the country's UNFCCC National Focal Point or designee to qualify post 2020 TREES Credits for CORSIA. ART will make all Letters of Assurance and Authorization publicly available by posting on the registry. A sample Letter of Assurance and Authorization is included as Exhibit 1 to this Annex B.
The Letter of Assurance and Authorization should explicitly:
• Identify the specific REDD+ activity to reduce emissions or enhance removals in the country;
• Acknowledge that ART has issued, or intends to issue, offset credits for [a stated volume in CO2-e] emission reductions or removals that occur within the country;
• Authorize the use of the REDD+ emission reductions or removals, issued as TREES Credits, by aeroplane operators in order to meet offsetting requirements under CORSIA, including providing a limit for the maximum number of emission reductions or removals that the country authorizes for use, including any limits on the time period over which the country provides such authorization;
• Declare that the country will not use the associated REDD+ emission reductions or removals to track progress towards, or for demonstrating achievement of, its NDC and will account for their use by aeroplane operators under CORSIA by applying relevant adjustments in the structured summary of the country's biennial transparency reports, as referred to in paragraph 77, sub-paragraph (d), of the Annex to decision 18/CMA.1, and consistent with relevant future decisions by The Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA); and
• Declare that the country will report on the authorization and use of the REDD+ emission reductions for the CORSIA [or by other countries] in a transparent manner in the country's biennial transparency report submitted under Article 13 of the Paris Agreement."

Part 5, Q7, Criteria: Avoidance of Double Counting, Issuance and Claiming and *Are only counted once towards a mitigation obligation*

Evidence: [see response to Part 5, Q1, c) and d); to Part 5, Q2; and to Part 5, Q4 above]
and
"Exhibit 1 of Annex B (pg 91) of TREES 2.0 provides a sample authorization letter, which includes the following guidance as suggested text: "We hereby request ART to submit annual reports to us, no later than by 31 March of each year, on the use of the offset credit's associated emission reductions / removals by other countries or entities, including volumes canceled for use by each country and entity.

We hereby declare that country X will not use the programs's emission reductions to track progress towards, or for demonstrating achievement of, its NDC and that country X will account for the use of the program's GHG emission reductions by aeroplane operators under CORSIA or by other countries through adjustments in the structured summary of country X's biennial transparency

reports, as referred to in paragraph 77, sub-paragraph (d), of the Annex to decision 18/CMA.1, and consistent with relevant future decisions by the CMA. We hereby also declare that country Y will report on the authorization and use of the program's emission reductions / removals by other countries or entities in a transparent manner in the country's biennial transparency report submitted under Article 13 of the Paris Agreement."' *Part 5, Q8(b)(i), Criteria: Avoidance of Double Counting, Issuance and Claiming* and *Are only counted once towards a mitigation obligation* **Evidence**: … "(b)(i) While ART's procedures do not specifically cite review of the relevant accounting information for the Application of Corresponding Adjustments consistent with 2/CMA.3 Annex I, ART would review this information as part of the ongoing confirmation of reporting to the UNFCCC. Any authorizations of ITMOs or for OIMP, including for CORSIA, would be reported in an Initial Report (AIR), published on the CARP. The AIR Section 4 includes information on ITMO metrics, method for applying corresponding adjustments and method for quantification of the NDC (para. 18(c–f)). ART would also review Annual Reports submitted to the UNFCCC no later than 15 April of the following year and posted on the CARP. Reports include the annual information on the authorization of ITMOs for use towards NDCs and OIMP (including CORSIA), which specify the for each cooperative approach the first transferring participating Party, the using participating Party or authorized entity or entities, as soon as known, the year in which the mitigation occurred, the sector(s) and activity type(s), and the unique identifiers. This information will be used to confirm that corresponding adjustments have been made." *Part 5, Q10, Criteria: Avoidance of Double Counting, Issuance and Claiming* and *Are only counted once towards a mitigation obligation* The information originally provided in ART's application would not be altered, but would be further amended, as specified below in section e.
e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:
Please note that the updates specified below do not change the scope of eligibility in the current ICAO Eligible Emissions Units document. We would be happy to answer any additional questions ICAO may have. The information provided in "d." has been changed to reflect further clarity of avoiding double counting and LOA provisions as follows: *Part 5, Q1, Criteria: Avoidance of Double Counting, Issuance and Claiming* and *Are only counted once towards a mitigation obligation* **Evidence:** a) and b) Section 13.1 (pg 83) of TREES 3.0 states: "Double issuance occurs when more than one unique unit is issued for a single ERR within the same program/registry or when more than one program/registry issues unique units for a single ERR. To mitigate the risk of double issuance, TREES requires the disclosure of any verified emission reductions and/or removals in the same accounting area, checks of duplicate registration under other programs (including offset programs) and requirements for disclosure of other registrations, as well as for cancellation of the units on one registry prior to re-issuance on another.

Verified ERRs from other initiatives (projects or programs) in the accounting area for the same calendar year, either led by the Participant or by other stakeholders, shall be deducted from the TREES issuance volume (Equations 28 and 33). This includes projects and/or REDD+ programs participating in other CO2e-based GHG crediting programs or initiatives such as multilateral and bilateral agreements and results-based payments and includes any results that are captured by TREES accounting. Note that Participants must also account for ERRs to which they do not have the rights (see Section 3.4.1), which may include project areas that do not yet have verified credits.

The deduction for each calendar year shall be based on the verified number of ERRs from the other GHG program or the CO2e ERR results receiving payment. It shall include any ERRs which could ever be issued from the project for a given calendar year. For some GHG programs, this may include the uncertainty or reversal buffer pool credits if these credits can eventually be returned and transacted by the project or Participant.

The deduction shall be made on a like-for-like basis, deducting emission reduction credits from the TREES emission reductions and removal credits from the TREES removals. If no credit type distinction is made by the other GHG program or results-based payments, then the deduction shall be applied to TREES emission reductions. If a Participant uses the spatially explicit approach for removals crediting (Section 4.3.1), removals credits must only be deducted from the TREES volume if they correspond to the same location as the areas of removals presented by the Participant."

…

c) and d) … Section 13.3 (pg 84) of TREES 3.0 states: "Double claiming occurs when the same ERR is used by two or more entities (e.g. Parties to the Paris Agreement, aeroplane operators under CORSIA, corporate voluntary buyers) to meet climate change mitigation obligations, targets, pledges, commitments or efforts, including international transfers under the Paris Agreement towards achievement of Nationally Determined Contributions (NDCs) and transfers for use by aeroplane operators under the ICAO CORSIA, or when voluntary market transfers are counted toward both corporate buyer pledges and supplier country NDCs. ART Participants may authorize transfers of TREES Credits for compliance purposes to buyers outside of the Participant's country by submitting a Host Country Letter of Authorization to ART[17], which must include required elements of an authorization[18], and providing an initial report or updated initial report[19] to the UNFCCC and subsequently reporting an accounting adjustment in the submission of annual information[20] and biennial transparency reports to the UNFCCC[21]. At present, voluntary market transactions do not always require corresponding adjustments, although some Participants and/or buyers may choose to require them."

Part 5, Q2, Criteria: Avoidance of Double Counting, Issuance and Claiming and *Are only counted once towards a mitigation obligation*

Evidence: [see changed response to Part 5, Q1, c) and d) above]
and

[17] See Host Country Authorization template on the UNFCCC website: https://unfccc.int/documents/646071
[18] As referred to in decision 2/CMA.3 and -/CMA.6, Matters relating to cooperative approaches referred to in Article 6, paragraph 2, of the Paris Agreement, Section I Authorization B, paragraph 5 Content of Authorization.
[19] As referred to in decision 2/CMA.3, annex, paragraphs 18–19 and -/CMA.6, Annex I Table of supplementary elements of information in initial report and any updated initial reports.
[20] Requested in the Agreed Electronic Format referred to in decision 2/CMA.3, annex, chapter IV.B, as contained in -/CMA.6, Annex II
[21] As referred to in paragraph 77, subparagraph (d) of the Annex to decision 18/CMA.1.

"Annex A (pg 100-107) of TREES 3.0 provides further details regarding requirements for avoiding double counting with ICAO's CORSIA. Notably, section A.2 (pg 102) of Annex B details the functionality features of the ART Registry that enable the avoidance of double counting in all its forms including items on the checklist in the Guidelines Section III.2 Table 3…"
and
"Section A.3 (pg 103-107) of Annex A explicitly lists ART's requirements for avoiding double counting in CORSIA: "To avoid double claiming with progress towards mitigation targets pledged by countries in their Paris Agreement Nationally Determined Contributions (NDCs) and emission reduction and removal units used for the CORSIA, TREES requires that countries authorize the use of offset credits by aeroplane operators under the CORSIA and provide a letter of authorization that they will report the use and corresponding adjustments to the UNFCCC in annual information reports and the structured summary of its biennial transparency reports."

Part 5, Q4, Criteria: Avoidance of Double Counting, Issuance and Claiming and *Are only counted once towards a mitigation obligation*

Evidence:
…"1. The Host Country Letter of Authorization[22]. The letter will be obtained from the country's UNFCCC National Focal Point or host country designee to qualify post 2020 vintage TREES Credits for CORSIA. ART will make all Letters of Authorization publicly available by posting on the registry.
The Letter of Authorization shall explicitly:

- Identify the national point of contact for the authorization;
- Identify the specific REDD+ activity to reduce emissions or enhance removals in the country;
- Acknowledge that ART has issued, or intends to issue, offset credits for [a stated volume in CO2-e] of [vintage year] emission reductions or removals that occur within the country;
- Authorize the use of the REDD+ emission reductions or removals, issued as TREES Credits, by aeroplane operators in order to meet offsetting requirements under CORSIA, including specifying the CORSIA compliance period(s) for which the units are authorized, providing a limit for the maximum number of emission reductions or removals that the country authorizes for use, including any limits on the time period over which the country provides such authorization;
- Specify the country's definition of "first transfer" and define the expected timing and processes for applying and reporting adjustments;
- Report the country's chosen accounting method consistent with the relevant provision of 2/CMA.3 Annex I "Guidance on cooperative approaches referred to in Article 6, paragraph 2, of the Paris Agreement; and
- Declare that the country will not use the authorized REDD+ emission reductions or removals to track progress towards, or for demonstrating achievement of, its NDC and will account for their use by aeroplane operators under CORSIA by applying relevant adjustments in the structured summary of the country's biennial transparency reports, submitted under Article 13 of the Paris Agreement, as referred to in paragraph 77, sub-paragraph (d), of the Annex to decision 18/CMA.1, and consistent with relevant future decisions by The Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA).

[22] A template authorization letter is available on the UNFCCC website: https://unfccc.int/documents/646071

In addition to the above, the Letter of Authorization shall include the following elements[23]:
"(a) A unique identifier for the cooperative approach, obtained from the centralized accounting and reporting platform, where available;
(b) The name(s) of the participating Party(ies) and/or entities, if known, covered by the authorization;
(c) The date and duration of the authorization, including the final date for mitigation outcomes to be issued, or to be used or cancelled, in connection with the first transfer specified by the Party as per decision 2/CMA.3, annex, paragraph 2(b), as applicable;
(d) The specification of the first transfer of the mitigation outcome, as specified by participating Parties, as per decision 2/CMA.3, annex, paragraph 2;
(e) The uses covered by the authorization, consistent with decision 2/CMA.3, annex, paragraph 1(d) and (f);
(f) The identification of or cross-reference to underlying regulations, frameworks, standards or procedures, including any specific methodologies underpinning the cooperative approach;
(g) Where changes to the authorization occur, information on the circumstances in which such changes may occur and a description of the process for effecting such changes in a way that avoids double counting;
(h) The quantity of internationally transferred mitigation outcomes, if applicable;
(i) Identification of the registry the participating Party has, or has access to, for the purpose of tracking and recording internationally transferred mitigation outcomes;
(j) Identification of the relevant registry(ies) in the underlying regulations, frameworks, standards or procedures that (1) contain mitigation outcomes or inform their calculation by the participating Party(ies) and (2) transparently track the status of underlying mitigation activities and outcomes as well as participation and transactions by entities, as applicable;
(k) The vintage(s) covered by the authorization;
(l) The metrics and units of measurement or conversion and the greenhouse gases covered by the authorization[24];
(m) The sector(s) covered, if applicable;
(n) The activity type(s) and/or activity(ies) covered, if applicable."

Part 5, Q7, Criteria: Avoidance of Double Counting, Issuance and Claiming and *Are only counted once towards a mitigation obligation*

Evidence: [see changed responses to Part 5, Q1, c) and d); to Part 5, Q2; and to Part 5, Q4 above]

and
Section 13.3.1 (pg 85) of TREES 3.0 covers Changes to Authorization and states the following: "In the event of a change to an ITMO authorization[25], ART would assess the changes to the authorization to ensure they are aligned with Article 6 requirements and any circumstances specified in the original authorization and that they have been reported to the UNFCCC. All updated authorizations will be posted on the ART registry.

[23] As referred to in decision 2/CMA.3 and -/CMA.6, Matters relating to cooperative approaches referred to in Article 6, paragraph 2, of the Paris Agreement, Section I Authorization B, paragraph 5 Content of Authorization.
[24] To ensure consistency in UNFCCC reporting and assurance of adjustments for CORSIA units issued, Participants must report the volume of units to be adjusted using the Global Warming Potential (GWP) value used by a country in its NDC reporting (in particular in its first NDC report) even in cases where it is different than the value used by ART to calculate the volume of offset credits issued. The volume that should be adjusted using the same GWP values the country uses in its NDC reporting will be provided to the country.
[25] For changes to OIMP authorization for CORSIA, see Annex A.

In the event an ITMO authorization is narrowed / rescinded, ART will remove the authorization label for the volume of issued units that have not already been first transferred, as defined in the Letter of Authorization. In the event that the Parties have specified in the authorization that the authorization can be revoked for first transferred units, and authorization for first transferred units is revoked, ART will require that the process specified to avoid double counting is followed. ART will not remove the authorization label from any units. In the event the authorization is broadened, ART will update unit labelling accordingly."

and
"Section A.3 (pg 106) of TREES 3.0 covers Changes to Authorization for CORSIA: In the event the host country makes changes to the scope of authorization for CORSIA, ART will assess such changes to ensure they are aligned with Article 6 requirements and any circumstances specified in the original authorization and that they have been reported to the UNFCCC. All updated authorizations will be posted on the registry.

In the event an authorization for CORSIA is narrowed / rescinded, ART will require compensation via the double claiming compensation mechanism for the volume of issued units that have not already been first transferred, as defined in the Letter of Authorization. In the event that the Parties have specified in the authorization that the authorization can be revoked also for first transferred units, and first transferred units are unauthorized, ART will require compensation for this volume as well via the double claiming compensation mechanism. ART will not remove the CORSIA Eligible label from any units.

In the event the CORSIA authorization is broadened, ART will update unit labelling accordingly.

In the event that ART receives a new or revised Letter of Authorization for CORSIA from a host country that, in the past, has not applied corresponding adjustments or reported on these as committed, ART's response would depend on the status of the outstanding commitment to report the adjustment to the UNFCCC.

Assuming that the outstanding commitment is still being discussed/investigated for validity (and not just a misunderstanding), ART would wait to accept the new authorization and label associated units as CORSIA Eligible until this instance is resolved – either by proof of reporting of the corresponding adjustment to the UNFCCC or compensation through the double claiming compensation mechanism.

In the event that the outstanding commitment has been resolved, including by reporting to the UNFCCC or via the double claiming compensation mechanism, ART would accept the new authorization."

Part 5, Q8(b)(i), Criteria: Avoidance of Double Counting, Issuance and Claiming and *Are only counted once towards a mitigation obligation*
Evidence: [see changed responses to Part 5, Q1, c) and d); to Part 5, Q2; to Part 5, Q4; and to Part 5, Q7 above]

Part 5, Q10, Criteria: Avoidance of Double Counting, Issuance and Claiming and *Are only counted once towards a mitigation obligation*
This response would not be changed, but would include the addition of the response given to Part 5, Q7 above regarding clarification to Changes in Authorization in Section 13.3.1 (pg 85) and Section A.3 (pg 106) of TREES 3.0.

CHANGE 14

a. Description of the change (e.g., the addition, modification, deletion undertaken):

The ART Registry transitioned to a new platform provider, ICE GreenTrace in June 2026. As a result of this process, all previous registry functionality remains the same, while links to the previous platform provider and the ART Registry Terms of Use have been updated. This registry transition was signaled in the March 2025 Second Compliance Period (2027-2029) Phase Application.

b. Rationale for the change:

To meet the goals of the Paris Climate Agreement, carbon markets must grow dramatically. To support that market growth, ERT – including ACR and ART – is bringing our nearly 30 years of carbon market experience to a partnership with the Intercontinental Exchange (ICE) to deliver a transformational registry platform. The ICE GreenTraceTM registry technology platform will be rolled out in phases, and when fully deployed will be a quantum leap forward in infrastructure to enable the scaling and integration of global carbon markets. The key pillars that underpin the design, development and operation of the ICE registry platform are: agile, customer driven, scalable, state-of-the-art market infrastructure, secure, user-friendly, and 24-hour support.

c. Where the change is reflected in the Programme's documentation or other resource(s)[26]:

All elements related to the ART Registry are documented on the ART website: https://artredd.org/art-registry/

The new ART Registry Terms of Use can be found here: https://artredd.org/wp-content/uploads/2026/03/art-registry-terms-of-use-v3.pdf

All public and downloadable reports can be found using the top navigation links on this page: https://greentrace.ice.com/art/

The CORSIA cancelation public report is available here: https://greentrace.ice.com/art/disclosures/corsia-cancellation-report

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

References to the new ART Registry provider were included throughout the entire March 2025 Second Compliance Period (2027-2029) Phase Application, including:

Part 2, Q6, Criterion: Offset credit issuance and retirement procedures
All originally provided registry functionality and listed procedures remain the same. A step-by-step guide explaining how procedures are done on the new platform are forthcoming.

Part 2, Q7, Criterion: Identification and Tracking, Clear and transparent chain of custody
[Only links listed in part c above have changed as the upcoming transition to new registry platform provider was signaled in original application: "All current ART Registry functionalities as described herein related to the carbon credit lifecycle will be supported by the new platform from program listing, validation/verification, and registration to credit issuance, transfer, retirement and cancelation.]

Part 2, Q8, Criterion: Identification and Tracking, Clear and transparent chain of custody

[26] If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

[Only links listed in part c above have changed as the upcoming transition to new registry platform provider was signaled in original application: “All current ART Registry functionality as described herein related to the carbon credit lifecycle will be supported by the new platform from program listing, verification, registration to credit issuance, transfer, retirement and cancelation. This includes the identification of ICAO Eligible emissions units; the identification of credit ownership/holdings; the identification, facilitation of tracking and transfer of credit ownership/holding from issuance to cancelation/retirement; the identification of unit status including issued, retired, canceled; the assignment of unique serial numbers to credits, which includes the designation of the country of origin and vintage and public documentation of sector of origin and REDD+ program documentation.”]

Part 2, Q9, Criterion: Identification and Tracking, Clear and transparent chain of custody
[Only links listed in part c above have changed as the upcoming transition to new registry platform provider was signaled in original application: “All current ART Registry account screening provisions and restrictions as described herein will remain in place when ART transitions to the ICE platform.”]

Part 2, Q10, Criterion: Identification and Tracking, Clear and transparent chain of custody
[Only links listed in part c above have changed as the upcoming transition to new registry platform provider was signaled in original application: “All current ART Registry functionality and contractual obligations as described herein related to Registry security and periodic audits for compliance with security provisions will be supported by the ICE platform and agreed by ICE for the provision of Registry services.”]

Part 2, Q13, Criterion: Identification and Tracking, Clear and transparent chain of custody
[Only links listed in part c above have changed as the upcoming transition to new registry platform provider was signaled in original application: “All current ART Registry functionality as described herein related to information in the ART “Canceled Credits” report will be supported by the ICE platform.”]

Part 2, Q14, Criterion: Identification and Tracking, Clear and transparent chain of custody
[Only links listed in part c above have changed as the upcoming transition to new registry platform provider was signaled in original application: “All current ART Registry functionality as described herein related to information in the ART “Canceled Credits” report will be supported by the ICE platform.”]

e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:

Please note that the updates specified in part c refer to updated document links reflecting a new registry platform provider only; they do not change registry functionality or the scope of eligibility in the current ICAO Eligible Emissions Units document. We would be happy to answer any additional questions ICAO may have.