General Comments on the Report of the Ad hoc Technical Expert Group on Biodiversity and Climate Change

Argentina

With regards to the section on incentive measures:

Firstly, it is considered that articles 11 and 22.1 of the Convention on Biological Diversity provides a framework for addressing the issue of incentives, which appears in several sections of the document (Introduction, paragraph H, Section 4). In Article 11 Each Contracting Party shall, as far as possible and as appropriate, adopt economically and socially sound measures that act as incentives for the conservation and sustainable use of components of biological diversity... Meanwhile, Article 22.1 states that the provisions of this Convention shall not affect the rights and obligations of any Contracting Party deriving from any existing international agreement, except where the exercise of those rights and obligations would cause a serious damage or threat to biological diversity. Therefore, the principles contained in those provisions should be taken into account when considering the question of "incentives" related to adaptation to climate change.

In line with the position that our country maintained in the past, it must be ensure to mention any reference to incorporate the provisions of the multilateral trading system and avoid any words that can be used to justify trade barriers or measures with distorting effects. It should be noted that the draft report does not contain adequate reference to the obligations of the Contracting Parties to other international agreements, in particular the WTO. In particular, the reference to the ecosystem services that contribute to the conservation of the visual quality of the landscape is repeated several times in the document (Section D "Key messages", Section 2.2, Table 2), it should be ensure that, payments made for such services, will be in conformity with WTO provisions.

In summary, the document does not contain the views expressed by our country on this matter under the CBD. Therefore, it is considered that it should be revised to reflect that incentives, beyond the fact that should be voluntary, and should also conform to the provisions of the multilateral trading system. Furthermore, the draft report includes several economic instruments that could be used as "incentives" and whose effects in terms of trade could be significant. Therefore, the status of the draft report under the CBD and the UN Framework Convention on Climate Change should be carefully evaluated.

Austria

The report addresses an important topic. Due to this importance it is suggested to use this report as a basis for a more elaborated Special Report prepared by the IPCC. It is expected that such a Special Report would be less policy prescriptive but still be policy relevant, it would be possible to track all findings properly through the report with all references included, it would have to reflect IPCC language to address uncertainty (e.g. by following the most recent rules established for the AR4), it would include a

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glossary, addressing all those terms that have been included in the special report and the report would have even a much broader scientific basis and would also receive more attention under the UNFCCC.

The only issue is that it is unlikely that such Special Report would be available before 2012. However, given the long-term nature of climate policy and the time needed to start real implementation after the Copenhagen agreement, this seems not to be a significant issue at all. The IPCC Special report addressed above should be written for the climate change community as well as for the biodiversity community whereas the current document seems more to identify topics where the biodiversity community feels to be influenced by decision from the climate change community.

Some terms need to be defined (this list is not exhaustive): biodiversity values, components of biodiversity, ecosystem health, societal adaptation, ecosystem-based adaptation, natural adaptation, natural capital, surrogate conditions, ecosystems functions, ecosystem services, level of endemism, restoration of ecosystems, value of biodiversity, full life cycle, renewable energy, invasive species, protected area networks.

Germany

The three "introductory" sections (preface, introduction and key messages) should be streamlined, as they partly echo the same train of thoughts, leading to repetition.

One option to solve this could be to focus the preface on the more technical UNFCCC and CBD background to the work of the AHTEG, moving the content of paragraphs 1-5 (importance of biodiversity to the MDGs, challenges of climate change for development, and impacts of climate change on ecosystem services) to the introduction or later sections of the report, and adding a short reference to the main documents / discussions demonstrating areas of common interest in the work of the two conventions, e.g. mentions of REDD in the Bali Action Plan, discussions on future treatment of LULUCF, importance of biodiversity to National Adaptation Strategies, National Adaptation Programmes of Action, Disaster Risk Reduction Strategies etc., and CBD Decisions calling for integration of biodiversity concerns into mitigation and adaptation activities. (Maybe also some statement on increasing recognition of the role of biodiversity in UNFCCC as shown by the above references and current negotiations.)

The introduction should not contain overlap with the key messages, as these are likely to be read by most readers. If it is to remain, it could lay out in a general way the relevance of the biodiversity-climate link to sustainable development, building on what is now paragraphs 1-5 of the preface, and maybe name the aims and target group of the report. Details such as those concerning projections of biodiversity loss and ecosystem carbon flows should be moved to the main body of the report and reflected in the respective sections of the key messages, if relevant.

The order of sections D and E in the main messages should be reversed, as ecosystem-based adaptation is a special case of adaptation and its description should follow the more general statements.

Many examples related to ecosystem values for mitigation and/or adaptation are referred to repeatedly in different sections of the report and considered from different points of view (e.g. in the sections on impacts, adaptation and economic valuation as well as in the case studies sections). To avoid the false impression that there is a lack of good examples, please streamline the use of examples, making sure that the information and references provided are consistent. One way to do this might be to refer to the case studies instead of repeating detail, another to replace the most frequently cited examples (flood control, mangrove conservation etc.) with others (e.g. protective forest or city greenspace) where this is possible.

Also, several case studies appear twice or even three times in the report (section on ecosystem-based adaptation, section on valuation and section on conservation principles). This should be avoided by cross-referencing and merging all information into one case study in one of the sections.

In line with the mandate of the report, the statements on options to ensure that REDD activities support the objectives of the CBD should be as precisely formulated as possible given the current state of UNFCCC negotiations on this issue.

With regards to restructuring the document:

Introduction paragraph 8: Could be moved to beginning of section 1.1 of main report.

Introduction paragraph 9: Overlap with “Key messages B” and section 1.1 of main report. Could be deleted.

Introduction paragraph 10: Merge with second bullet of “Key messages B” and section 1.1 of main report (top of page 15 and page 17, on the latter the same study is apparently referred to using a different quotation).

Introduction paragraph 11: Merge with section 1.1 of main report (third and fourth paragraphs on page 15).

Introduction paragraph 12: Streamline with fourth bullet of “Key messages B” and merge with section 1.1 of main report (second paragraph on page 15).

Introduction paragraph 13: Merge with section 1.1 of main report (bottom of page 16).

Introduction paragraph 15: Streamline with third bullet of “Key messages F” and merge with section 3 of main report (top of page 42).

Introduction paragraph 16: Merge with section 3 (page 42).

Introduction paragraph 17: Streamline with Key messages F and section 3.

Introduction paragraph 18: Streamline with section 4.1 (page 54).

Introduction paragraph 19: Streamline with sections 1.1 (page 15) and 4.1 (page 54).

Introduction paragraph 20: Merge with third bullet of “Key Messages C” and streamline with section 2.1.

Introduction paragraph 21: Delete or merge with “Key messages D” and section 2.2 (page 32).

Introduction paragraph 23: Delete (overlap with “Key messages E”, second bullet).

Introduction paragraph 24: Streamline with paragraph 17 and Key messages F and G.

Key messages: The order of sections D and E should be reversed, as ecosystem-based adaptation is a special case of adaptation and its description should follow the more general statements.

Section 1.1, p. 13, fourth bullet: Streamline with Introduction, paragraph 9, if necessary

Section 1.1, p. 17, first three paragraphs: Move to and merge into section on “Ecosystem-based adaptation” to avoid repetition.

Section 1.2, p. 18, first paragraph: This could be merged with first paragraph on page 14.

Page 20, last paragraph: This paragraph should be merged with preceding section on research gaps.

Page 22: merge first and fourth bullet

Page 23, fourth paragraph: this paragraph does not fit the heading – please merge with text on research gaps on page 20 or with the preceding section on key areas that require scientific development.

Page 23, last paragraph: merge second sentence with subparagraph c), as there is a large repetition

Section 2, second to fourth paragraphs: move to section 1, as both uncertainty of projections and projected impacts of climate change (including the conversion of sinks to sources) are already addressed there.

Page 27, third paragraph: move to section 1 of the report (as this deals with impacts, not adaptation). Amend references to temperature rise (temperature rises will stay above 2°C, etc.).

Page 30, second paragraph (“Depending on…”): integrate into section 3.

Page 30, section 3: combine with text on eco-engineering from section 1 to new section 3 on “Pro-active manipulative interventions”.

Sections 2.2 and 2.3: A restructuring of this part of the report is suggested in order to make the relationship between the different aspects of adaptation stand out more clearly. As the text stands, the transition from considerations on conservation-specific adaptation back to observations concerning societal adaptation is not explained at all and may escape some readers, leading to misinterpretation of what is meant by ecosystem-based adaptation. If the suggested restructuring is not taken up, a short introduction should be included to avoid this.

Page 32, fifth paragraph: delete or merge with text on co-benefits on page 33 as well as text from page 17 to avoid repetition.

Page 35, second paragraph: please streamline mangrove case studies with quotations on page 17 to avoid repetition.

Page 35, second paragraph: please streamline with page 55.

Page 35, Kimbe Bay example: please streamline with pages 55 and 62.

Page 40, second paragraph on freshwater management: delete or integrate into case studies on pp.36-37 to avoid repetition.

Page 40, second paragraph on forestry: delete third to sixth sentence or streamline with case study on page 37 to avoid contradiction.

Norway

In a number of cases the *actual* climate change could be referred to (climate warming, higher/lower precipitation etc) rather than "CC" in general

Could have been some mentioning of

- possible irreversibility
- the importance of the precautionary principle
- the need for good monitoring systems as a requisition for adaptive management
- genetic diversity as a requisition for species themselves to adapt to climate change through natural selection
- the possible increasing problem of eutrofication in freshwater systems in some areas with higher precipitation and higher runoff

Could be a bit more focus on biodiversity being more than number of species/species-richness (cf. we expect higher species richness in the North, but this will not automatically mean higher biodiversity (e.g. if we loose some special (species-poor) habitat types)

In section 3 where possible effects of the use of renewable resources are discussed: effects of wind plantations on biodiversity could be expanded on.

We would appreciate some elaborations regarding:

- Biofuel: The report could be more specific with regard to the possible differences between first and second generation
- Biogas: we miss some considerations regarding biogas from agrowaste
- Biochar: should be addressed.
- Ecological farming and climate change

UNFCCC Secretariat

Overview: a table of contents should be added

Wording: Some of the wording is unclear, repetitive or does not use qualifiers. This may be related to the fact that the text is unedited (corresponding text has been highlighted and can be further discussed in Capetown)

Flow: In some sections the text reads a bit bumpy, bolded headers sometimes do not seem to link up sufficiently with the following text, which, sometimes, ends rather openly.

Gender: One of the aspects that have not been reflected in the adaptation section is the gender dimension. Recognizing the different adaptive capacity of men and women and different roles that they have in implementing ecosystem-based adaptation approaches, it could be relevant to indicate gender mainstreaming as one of the issues for consideration.

List of authors: Although the UNFCCC secretariat gladly contributes to the work of the AHTEG, we should, in our function as Observer, not figure as an author.

Collaborative Partnership on Forests

Based on AHTEG recommendation regarding further support of SFM as a tool to address the implementation of REDD-plus and other challenges, the Partnership must clarify that conservation is the SFM management objective of choice for all remaining primary forests. Otherwise the CBD can not

further promote the use of the term in relation to all aspects of REDD-plus, as it is ambiguous at this stage whether SFM could also be used to promote the opening of primary forests for logging.

IUCN

We are already living an extinction crisis, with species disappearing at an alarming rate. This means that we will have less plants for future medicine or animals that could inspire our engineers through bio-mimicry, it means that the natural resilience achieved after millions of years is now either diminished or in the process of being lost. (According to latest research by IUCN's Species Survival Commission, 52% of amphibians, 35% of birds and 71% of warm-water reef-building corals are susceptible to climate change.)

This report and the work of the AHTEG present an opportunity to highlight the urgency of acting rapidly and efficiently in the face of current challenges. We are running out of time to reverse a series of dangerous trends. For too long, we have been taking much more than the Earth can produce and it should be recognized that we have overdrawn our account of natural assets and the natural environment upon which we depend is compromised as a result. It can recuperate, but the treatment has to be real, on a massive scale, and immediate.

It is important to note, in general, progress made in advancing synergies and cooperation between CBD and UNFCCC through the work of the AHTEG. The subject of adaptation is particularly relevant in this respect.

It is important to compile useful information about tools, methodologies and case studies on the impacts of climate change on biodiversity. Nevertheless, the scientific verification or review of its reach is not referred to.

Throughout the key messages in the report, examples are very much taken from the terrestrial field, especially when the carbon cycle is mentioned. A note on the potential importance of oceans and coastal waters in the preface might be useful.

Invasive species may be "symptomatic" to climate change, and may be important to maintain ecosystems functioning and producing ecosystem services in a rapidly changing environment. They are not only to be discarded or seen as a problem. In fact, the issue of alien invasive species should be seen in a holistic and comprehensive way.

All non-dynamic ecosystems that require a long period to establish themselves are vulnerable to climate change. This applies to most climax forests vegetations, but also some wetlands. Ecosystems like floodplains and coastal zones on the contrary are characterized by a high number of "opportunistic species" that readily adapt to changing situations colonizing every corner that comes available and is in its range of ecological requirements. In this respect mangroves should not only be considered as vulnerable to climate change, but their ability to colonize continuously emerging mud-banks wherever they appear in the tropical zone must also be mentioned; this characterizes them as very dynamic ecosystems.

Adaptation may also lead to the creation of new ecosystems, which is different from restoration. (An example may be the Grevelingen lake in The Netherlands, a non-tidal salt water lake with a high biodiversity level).

Ecosystem based Adaptation should be flexible and keep all options open to provide alternatives for changes in the future that were not foreseen. Large infrastructural works might be seen by some as a special and extreme case of EbA but these works generally eliminate all other options and are therefore to be avoided where possible.

Talking about cost-effectiveness, we have to indicate the period we mean. Economists talk about a different cost-effectiveness than ecologists do, because they consider a much shorter time-frame. Pavan Sukdev for instance, alludes to a negative discount percentage to bridge this gap between the economists and the ecologists.

The importance of EbA for local communities is mentioned very often, but it is also important to highlight its impact on urban communities and more widely.

Cultural aspects are also important non-economic incentives to be mentioned explicitly.

It seems important to articulate the common ground between the Ecosystem Approach and Ecosystem based Adaptation under the CBD. The principles of the EA should be considered within EbA examples and implementation.

Wetlands International

Annex 3 table is very difficult to read

Nepenthes

Overall, we find it very positive that the CBD has established the AHTEG to provide input to the many UNFCCC discussions that will affect and be affected by biodiversity. We agree with many of the group's findings, such as the crucial importance of protecting primary and intact forests and the concern that indigenous and local communities may not benefit from REDD if their rights are not fully recognized and respected.

However, we do have concerns about some elements the text, which we hope you will address. Below, I will outline our main points, which are centered on the section on REDD; following this you will find detailed comments.

Our first concern is that the section addressing REDD uses the wording "LULUCF activities including REDD." This is problematic because LULUCF usually refers specifically to accounting for the forest and land use sector under the Kyoto Protocol, and it would not be desirable to transfer the LULUCF accounting rules to REDD, which is negotiated under the Convention on Climate Change. Although the LULUCF accounting rules are at the moment under negotiation under the Protocol and can therefore change, such a transfer would, for example, most likely entail net accounting rather than gross, contrary to the recommendation on page 45 of the draft findings on the specific design of a REDD mechanism.

In addition, the use of the term LULUCF can be interpreted as an endorsement of expanding the REDD mechanism to other sectors, which appears both undesirable and unrealistic in the short term, only adding uncertainty to the negotiation process and opening the door to watering down accounting rules. It would thus be preferable to use more neutral wording, such as land use or land management.

Our second concern is that the findings do not discuss which mitigation options should be prioritized when REDD is implemented although mitigation options in different landscapes with different levels of deforestation are clearly differentiated. We highlight that in order to achieve maximum benefit for climate and biodiversity with a limited amount of funds, the REDD mechanism should be directed towards reducing emissions, i.e., preserving existing forests. We are therefore concerned about the emphasis placed on reforestation in the context of mitigation, though it clearly can play an important role in adaptation. This emphasis on reforestation also seems to run counter to the recommendation of gross accounting.

Our third concern is the emphasis on sustainable forest management (SFM) throughout the REDD text as well as the mention of SFM as the most important adaptation tool for forestry. Sustainable forest management may clearly be useful as a tool that is part of an adaptation or mitigation strategy but it should not be considered the only or even the primary tool, and it should certainly not become and aim of its own. In addition, the endorsement of SFM without a very clear definition of what it is and is not could give countries a free claim to REDD funding simply by maintaining that their current forest management practices are sustainable.

In our view, there are many more options for reducing emissions in forest landscapes currently undergoing deforestation and degradation than the two (SFM and reforestation) mentioned in the current text. In such landscapes, the fundamental problem is to address the underlying drivers of deforestation, as documented by e.g. Chomitz et al, 2007. Thus most of the tools which are recommended for implementing ecosystem based adaptation in section 4.3 (page 56) could be recommended for REDD also. The references to SFM and reforestation should be eliminated or reduced to a mention of two policy options among many others that could be pursued in order to achieve a reduction in emissions.

Finally, it is mentioned in the findings that the potential for mitigation from REDD will be affected by the price of carbon. However, other factors influencing this mitigation potential are not mentioned. These include funding available through non-market sources, availability of capacity building and technology transfer, the scale of the mitigation targets adopted by Parties and the possibility of evaluating not only the carbon sequestration value but also the value of other ecosystem services protected through REDD. Thus the current text a) appears to take a market mechanism for granted and b) ignores e.g. the possibility that funding for carbon could be combined with funding for adaptation or other ecosystem services.

CEPF

CEPF supports the background and the main findings of the report. However, in general we recommend to enhance the role of SFM in climate change mitigation and adaptation as well as in preserving biodiversity. SFM have an important role to play in developing countries with problem with deforestation and forest degradation. CEPF promotes SFM and global efforts toward the UN Millennium Development Goals through International Family Forest Alliance (IFFA), the Forest Dialogue (TFD) and Growing Forest Partnership (GFP). These initiatives has been carried out in a partnership with IUCN (the International Union for Conservation of Nature), IIED (The International Institute for Environment and Development) and FAO and is supported by The World Bank. The aim of GFP is to support multi-stakeholder forest processes in developing countries.

The Wilderness Society

1. Use of the term LULUCF

Use of the acronym LULUCF in the section addressing REDD ie "LULUCF activities including REDD", is problematic. This term is generally used to designate Land Use, Land Use Change and Forestry activities under the Kyoto Protocol (KP) and the system of rules applied to Annex 1 Parties. REDD (Reducing Emissions from Deforestation and Forest Degradation) is being developed under the Framework Convention, not the KP, for application in developing countries and is not conceived as falling under LULUCF. In fact there are concerns that perverse rules and outcomes being experienced in LULUCF are not carried into REDD, and that they are rectified for future commitment periods of the KP. A key issue in this regard is that LULUCF accounting is net and not gross, so an implication of support for net accounting through use of the term LULUCF would be contrary to the recommendation on page 45 of the draft findings on the specific design of a REDD mechanism that would account gross deforestation.

The intention in this report appears to be to refer generally to land-based land use categories and management, and the term LULUCF has been utilized with this aim. A more appropriate term may be AFOLU (Agriculture, Forestry and Other Land Uses). It is utilized to refer more generally to the sector and is not hampered by the specificity of LULUCF to the KP. AFOLU is the term utilized in the most recent version of the IPCC Guidelines (2006) whereas LULUCF is the term utilized in the earlier (1996) version. That said, it needs to be pointed out that this most recent version of the IPCC Guidelines has not yet been adopted by Parties although it may soon be, and that it is difficult to be definitive about the 'correct' term without pre-empting negotiations. Reservations also exist about the use of the term AFOLU if it is used to imply expansion of REDD across the landscape at this early stage. Use of either the term LULUCF or AFOLU can be interpreted as an endorsement of expanding the REDD mechanism to other sectors, which appears both undesirable and unrealistic in the short term, only adding uncertainty to the negotiation process and opening the door to watering down accounting rules.

It would thus be preferable to use more neutral wording, such as land use or land management.

2. Prioritisation of Mitigation Options

The findings do not sufficiently outline which mitigation options should be prioritized when REDD is implemented, although mitigation options in different landscapes with different levels of deforestation are clearly differentiated. We highlight that in order to achieve maximum benefit for climate and biodiversity with a limited amount of funds, the REDD mechanism should be directed towards reducing emissions, i.e., preserving existing forests. We are therefore concerned about the emphasis placed on reforestation in the context of mitigation, and confusion between the two differing activities of forest restoration and reforestation. This emphasis on reforestation also seems to run counter to the recommendation of gross accounting.

The Wilderness Society along with other National and International ENGOs have identified a clear set of policy priorities for maximizing emissions reductions and the mitigation potential from the LULUCF sector and any future REDD mechanism. These priorities reflect mitigation potential embodied in the 'forest transition curve'.

The Wilderness Society has articulated these priorities below. This hierarchy goes from the highest priority to the lowest and represents an approach that will also maximize biodiversity conservation[1].

[1] J. Barlow, T. A. Gardner, I. S. Araujo, T. C. A vila-Pires, A. B. Bonaldo, J. E. Costa, M. C. Esposito, L. V. Ferreira,J. Hawes*, M. I. M. Hernandez, M. S. Hoogmoed, R. N. Leite¶, N. F. Lo-Man-Hung, J. R. Malcolm, M. B.

(i) The protection of carbon stocks in primary forest and other primary ecosystems (including peat lands) from logging, conversion to plantation or agriculture and other forms of degradation including deforestation.

(ii) The recovery or restoration of natural forest and other natural ecosystems (including peat lands).

(iii) The development of ecologically sustainable forest management systems in logged areas that are currently the subject of industrial logging practices.

(iv) Afforestation and reforestation in areas of degraded land incapable of natural recovery.

In addition, a clear policy outcome has to be that the conversion of natural forests and other natural ecosystems to plantations is not an acceptable mitigation strategy. This is because the intrinsically emissive nature of the practice and the devastating impact on biodiversity undermines the environmental integrity of the convention. The current emphasis of the report on reforestation could imply support for plantation conversion of degraded forests in preference to forest restoration.

3. Inappropriate Emphasis on Sustainable Forest Management (SFM)

The emphasis on sustainable forest management (SFM) throughout the REDD text as well as the mention of SFM as the most important adaptation tool for forestry is concerning. SFM should certainly not become an aim of its own.

The Bali Action Plan refers to 'sustainable management of forests' as one of several activities comprising the 'plus' addition to REDD, which activities were deliberately designated as subservient to reducing emissions from deforestation and forest degradation via the use of a much argued semi-colon[2].

Where the AHTEG report intends to refer to this REDD construction, 'sustainable management of forests', it should utilize precisely this terminology and not substitute 'sustainable forest management' (SFM) which has accumulated its own set of contested interpretations.

It can be argued that sustainable management of forests (or more accurately, ecologically sustainable management of forests) may be useful as a tool that is part of an adaptation or mitigation strategy but it should not be considered the only or even the primary tool.

The endorsement of SFM without a very clear definition of what it is and is not could give Parties a free claim to REDD funding simply by maintaining that their current forest management practices comprise SFM. Rice et al (2001)[3] document the diversity of interpretation of what SFM comprises, highlighting that the emphasis in practice has been more on maintaining sustainable

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Martins,L. A. M. Mestre, R. Miranda-Santos, A. L. Nunes-Gutjahr, W. L. Overal, L. Parry*, S. L. Peters, M. A. Ribeiro-Junior,M. N. F. da Silva, C. da Silva Motta, and C. A. Peres, 2007. Quantifying the biodiversity value of tropical primary, secondary, and plantation forests,
PNAS The National Academy of Science.

[2] The Bali Action Plan, in its paragraph 1(b)(iii), calls for the consideration of enhanced national/international action on mitigation of climate change, including, inter alia, policy approaches and positive incentives on issues relating to reducing emissions from deforestation and forest degradation in developing countries; and the role of conservation, sustainable management of forests and enhancement of forest carbon stocks in developing countries.

wood supply rather than on ecological sustainability of forestry practices. It is not necessarily effective in enhancing or maintaining biodiversity. In practice SFM covers anything that is not illegal, and includes industrial scale logging[4].

In our view, there are many more options for reducing emissions in forest landscapes currently undergoing deforestation and degradation than the two (SFM and reforestation) mentioned in the current text. See our recommended hierarchy of options under point 2, above. In such landscapes, a fundamental problem is also to address the underlying drivers of deforestation, documented by Chomitz et al, 2007[5]. Most of the tools which are recommended for implementing ecosystem based adaptation in section 4.3 (page 56) could be recommended for REDD also.

The references to SFM and reforestation should be eliminated or reduced to a mention of *ecologically* sustainable management of forests and reforestation as two policy options among many others that could be pursued in order to achieve a reduction in emissions. Construction of a hierarchy of effective actions is recommended.

4. Definitions and Classification of Forests

Also problematic in dealing with biodiversity in forests is the UNFCCC definition of 'forest', and that the UNFCCC does not use the FAO classification of forest types, or even the simplified version of the FAO classification utilized in this report.

The current definition used for reporting and accounting purposes under the Kyoto Protocol, which may be carried into REDD, is structurally based comprising:

- A minimum area of land of 0.05 hectares with tree crown cover (or equivalent stocking level) of more than 10 per cent with trees with the potential to reach a minimum height of 2 metres at maturity *in situ*.
- It includes (i) young stands of natural regeneration; (ii) all plantations which have yet to reach a crown density of 10-30 per cent or tree height of 2-5 metres; (iii) areas normally forming part of the forest area which are temporarily unstocked as a result of human intervention such as harvesting or natural causes but which are expected to revert to forest.

No distinction is made between natural forest and plantations. Conversion of natural forest to plantation is not explicitly identified nor accounted. No change (and no deforestation) has occurred, by definition.

The limitation of the forest definition and associated rules does not allow an appreciation of the ecological differences between different forest types and is likely to hinder understanding and application of biodiversity considerations, if not yield perverse results.

We urge the CBD AHTEG to explicitly address the need for classification of forest types and to recommend that the FAO classification (being a UN classification), or some version of this, is adopted.

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[3] Rice, RE; Sugal CA; Rattray, MR; da Fonesca, GAB; 2001. Sustainable Forest Management – A Review of Conventional Wisdom. Advances in Applied Biodiversity Science No 3, Center for Applied Biodiversity Science, Conservation International.

[4] Vested Interests – industrial logging and carbon in tropical forests, 2009. A Report by Global Witness. Global Witness Publishing Inc.

[5] Chomitz, K. M. et al, 2007: At loggerheads? Agricultural Expansion, Poverty Reduction and Environment in the Tropical Forests, World Bank.

5. External Factors Influencing Mitigation Potential

The findings mention that the potential for mitigation from REDD will be affected by the price of carbon, but other factors influencing this mitigation potential are not mentioned. These include funding available through non-market sources, availability of capacity building and technology transfer, the scale of the mitigation targets adopted by Parties and the possibility of evaluating not only the carbon sequestration value but also the value of other ecosystem services protected through REDD.

Thus the current text appears unduly focused on a market mechanism, ignoring other possibilities such as that funding for carbon could be combined with funding for adaptation or other ecosystem services.