

**Comments on
Elements for a possible draft decision on modalities for national forest
monitoring systems and measuring, reporting and verifying**

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This document explains our preferred text for REDD+ monitoring and MRV, and uses footnotes to describe why specific text was chosen. In some cases we provide new text where we felt existing text was inadequate, those suggestions are written in **red text**.

Recalling decisions 2/CP.13, 4/CP.15, 1/CP.16, 2/CP.17 and 12/CP.17,

[Modalities for national forest monitoring systems

1. *Decides* that the development of national forest monitoring systems for the monitoring and reporting of activities referred to in decision 1/CP.16, paragraph 70, with, if appropriate, subnational monitoring and reporting as an interim measure, [shall] [should] take into account the guidance provided in decision 4/CP.15 and be guided by the most recent Intergovernmental Panel on Climate Change guidance and guidelines, as adopted or encouraged by the Conference of the Parties, as appropriate, as a basis for estimating anthropogenic forest-related greenhouse gas emissions by sources, and removals by sinks, forest carbon stocks, and forest carbon stock and forest-area changes;
2. *Also decides* that robust national forest monitoring systems should provide data and information that are transparent, consistent over time, **and consistent with reference levels complete**¹ [and have undergone quality assurance and quality control];ⁱ
3. ~~[Affirms robust and transparent national forest monitoring system contributes to strengthen forest governance including law enforcement and to further consider counter measures to deforestation and forest degradation, and to promote effective implementation~~

¹Complete here **Consistent with reference levels** means the provision of data and information that allows the technical analysis of the results [and the establishment of forest reference emission levels and/or forest reference levels].
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ⁱ The term “complete” has a different meaning for the IPCC; therefore, it should be replaced with language that more adequately expresses the sentiment of being consistent with RL/RELS without creating a new meaning for this word; Quality assurance and quality control is suggested by the IPCC.

~~of the activities referred to in decision 1/CP.16, paragraph 70, further on, sustainable forest management including deploying multiple functions of forest;~~ ii

4. *Also decides* ~~that~~ in the context of the provision of adequate and predictable support, including financial resources and technical and technological support to developing country Parties, in accordance with national circumstances and respective capabilities, national forest monitoring systems ~~that~~, with, if appropriate, subnational monitoring and reporting as an interim measure as referred to in decision 1/CP.16, paragraph 71 ~~[(b) and] (c), and in decision 4/CP.15, paragraph 1(d)]~~ should: iii

- (a) Build upon existing systems, as appropriate;
- (b) Provide information on all forest ~~[areas] [land]~~ in the country; iv
- (c) Enable the ~~[assessment] [identification]~~ of changes incurred in ~~natural~~ forests; v
- (d) Be flexible and allow for improvement;
- (e) Reflect, as appropriate, the phased-approach as referred to in decision 1/CP.16, paragraphs 73 and 74;
- (f) Identify potential sources of uncertainties to the extent possible;

5. ~~[Also acknowledges that national forest monitoring systems may provide]~~, as appropriate, ~~relevant [data and] information~~ **and information management systems that are relevant** for ~~[national] systems for the provision of information on how safeguards are addressed and respected;~~ vi

6. ~~[Decides]~~ **Also acknowledges** that **countries, such as those** under the joint mitigation and adaptation approach for the integral and sustainable management of forests, **may wish to develop** a comprehensive and holistic monitoring system **which shall comply with the guidance provided here and in previous COP decisions** ~~be developed considering the multiple functions of forests in climate change;~~ vii

ii The content and purpose of this paragraph are unclear.

iii Edits to this paragraph were made to appropriately reflect past COP decisions.

iv Forest land is a more comprehensive term.

v Assessment is needed to evaluate performance of REDD+ activities, and should apply to all forested land.

vi The efficiency of REDD+ can be improved if monitoring systems are simultaneously used to provide information for both carbon results and safeguards.

vii It is important to acknowledge that some countries may want to develop more holistic monitoring systems. These must also comply with the monitoring guidelines provided by the UNFCCC. Because these approaches are optional they should be included as appropriate according to national circumstances, and additional guidance from SBSTA is not necessary.

{Modalities for measuring, reporting and verifying

[Reaffirms that in accordance with decision 1/CP.16, paragraph 73, the outcomes of results-based actions should be fully measured, reported and verified;] ^{viii}

~~*[Agrees that the actions which preserve and enhance the multiple benefits of forests, are also those that contribute to the sustainability and permanence of emission reductions;]*~~

ix

1. *Decides* that measuring, reporting and verifying anthropogenic forest-related emissions by sources and removals by sinks~~}, and, as necessary,~~ forest carbon stocks, and forest carbon stock and forest-area changes resulting from the implementation of the activities referred to in decision 1/CP.16, paragraph 70 ~~[and paragraph 71(b)]~~, should be consistent with the ~~{most recent Intergovernmental Panel on Climate Change guidelines and }~~methodological guidance provided in decision 4/CP.15, and any guidance on measuring, reporting and verification of nationally appropriate mitigation actions by developing country Parties as agreed by the Conference of the Parties, ~~{and in accordance with any future relevant decisions of the Conference of the Parties;}~~ ^x
2. ~~{Decides that adequate and predictable support, including financial, technical and technological support will be provided to developing countries, consistent with decision 1/CP.16;}~~
3. *Decides* that developing country Parties aiming to undertake activities in accordance with decision 1/CP.16, paragraph 70 ~~{, taking into account paragraph 71 (b)}~~, should provide data and information on anthropogenic forest-related emissions by sources and removals by sinks ~~{, and, as necessary,}~~ forest carbon stocks, and forest carbon stock and forest-area changes ~~that are transparent, complete², that is consistent with the guidance, methodologies, and elements established for forest reference emission level[s]/forest reference level[s] in decision 12/CP.17 and over time, {and} accurate to the extent possible {and comparable};~~ ^{xi}
4. ~~{Agrees that {, subject to adequate and predictable financial support in all phases} a stepwise approach to {acquire more and/or} {measuring, reporting and verifying may be useful, enable}e countries to incorporate} better data for the relevant pools and /or gases and to improve methodologies {may be useful}, {and where appropriate, incorporate additional pools and gases,} as appropriate, recognizing that conservative³ {treatment of}~~

^{viii} While the results of REDD+ actions should be fully measured, reported, and verified, the MRV of each specific action would be overly onerous.

^{ix} This paragraph does not apply to an MRV decision and therefore is not needed in this text.

^x Although the sentiment of applying MRV to RL/REs by referring to paragraph 71(b) of 1/CP.16 is important, it is not needed in this paragraph. Finally, MRV systems will likely be iterative and therefore should be subject to future guidance by the COP.

² ~~{footnote to be elaborated}~~

³ [placeholder for a footnote]

^{xi} This paragraph is critical for the effectiveness and efficiency of REDD+ by ensuring that results will be compared with reference levels/reference emissions levels. We think our proposed language more clearly makes that link. Measuring, reporting, and verifying outcomes as performance against the RL/REL is efficient, effective, and necessary for determining results.

estimates for some of these pools may be necessary to account for financial, technical, and/or technological constraints, while maintaining consistency with the established forest reference emission level[s]/forest reference level[s]; ~~[noting the importance of adequate and predictable support as referenced by decision 1/CP.16, paragraph 71];~~ xii

5. *Further decides* that, **taking into account** ~~consistent with~~ Decisions 1/CP.16 and with Annex III to Decision 2/CP.17, the data and information referred to in paragraph 3 above should be provided through **national communications and** biennial update reports, taking into consideration additional flexibility given to least developed countries and small island developing countries; xiii

6. ~~*Further decides* to request the Subsidiary Body on Implementation to appoint a technical expert committee to create a common reporting format and technical assessment for information provided in accordance with paragraph 3 above; that, on a temporary basis before the international consultation and analysis process is fully operational, Parties providing information in accordance with paragraph 3 above may, on a voluntary basis, request that this information be technically assessed;~~ xiv

7. ~~*Requests the secretariat*, subject to the availability of resources, to respond to the requests made by Parties in relation to paragraph 6 above by mandating technical experts to undertake a technical assessment of the implementation of actions related to decision 1/CP.16, paragraph 70 [and taking into account paragraph 71(b)], and to prepare a report on this assessment;~~

8. ~~*Further decides* that measuring, reporting and verification of the support provided by Parties included in Annex I to the Convention to Parties not included in Annex I for activities referred to in paragraph [xx above] should be carried out by a UNFCCC team of technical experts equitably balanced between members of developed and developing countries and supported by the secretariat in consultation with relevant national authorities in accordance with countries national circumstances, capacity and capabilities;~~

xv

9. ~~*Decides* [Encourages] that [developed country] Parties [according to the principles of,] [to] the Convention should establish and support, technologically, technically and financially, programs for specific capacity development in developing country Parties implementing activities as referred to in decision 1/CP.16, paragraph 70 [taking into account paragraph 71(b)], with the aim to: xvi~~

(a) Develop robust and transparent forest monitoring systems;

xii A stepwise approach to MRV can be very useful for improving systems over time, so long as the limitations are acknowledged.

xiii Taking into consideration other reporting formats allows for flexibility in REDD+ reporting for its unique nature.

xiv The SBI should create a process specific to REDD+ MRV in accordance with this decision, which could be used immediately but could also, in the future, be incorporated into ICA when that process is finalized.

xv Support should also be monitored, reported, and verified.

xvi All Parties should participate in supporting development of capacity for MRV systems. The details for biennial reports and ICA are not complete; therefore although forest sector information for these reporting formats can be useful MRV of REDD+ should continue forward while these are being developed.

(b) [Fulfill the required forest [sector] reporting requirements within national communications and biennial update reports;]

(c) [Support the process of international consultation and analysis of [national communications and] biennial update reports;]

10. ~~[[In addition, [in accordance with relevant articles of the Convention,] the] [Encourages] [developed country] Parties [in a position to do so] [should] [to] [establish] [[and/or] facilitate] [a free] access [to] [resource for] the [most accurate] [necessary] existing and future satellite imaging data available globally, given that the accuracy of the national forest monitoring system may improve depending on the financial and technical support received in order to build the required national capacity to access and process available satellite information and data;]~~ ^{xvii}

11. ~~[Also decides that the [reported] reduced emissions [from sustainable management of forests] [or increased removals [or stabilized forest carbon stocks]] [from results-based actions] in the activities referred to in decision 1/CP.16, paragraph 70 [taking into account paragraph 71(b), [will] [may] be [subject to] [an international] [and] [national] [verification process, carried out by an independent] [third party] [[team of experts] under the auspices of the UNFCCC], [international consultation and analysis process] in accordance with [further guidelines to be developed under the Convention;] [any guidance on measurement, reporting and verification of nationally appropriate mitigation actions by developing country Parties as agreed by the Conference of the Parties]]]~~ ^{xviii}

12. ~~[Agrees that, consistent with the forest reference emission level[s]/forest reference level[s], measurement should be done in terms of CO₂eq [and the other co-benefits, including local community, livelihood, poverty eradication, and biodiversity conservation] [to the same pools and gases, and activities listed in decision 1/CP.16, paragraph 70, which have been used in the construction of forest reference emission level[s] or forest reference level[s] according to decision 12/CP.17]]]~~ ^{xix}

13. ~~[Invites the Intergovernmental Panel on Climate Change to elaborate methods and provide good practice guidance on measuring, reporting and verifying anthropogenic forest-related emissions by sources and removals by sinks, forest carbon stocks, and forest carbon stock and forest-area changes resulting from the implementation of the activities referred to in decision 1/CP.16, paragraph 70 [and taking into account paragraph 71(b)], to be submitted for consideration and possible adoption by the Conference of the Parties at a future session;]~~

14. ~~[Requests the Subsidiary Body for Scientific and Technological Advice to continue its consideration of modalities for [measuring,]reporting and [verification of results-based~~

^{xvii} The ability to access information that supports and improves MRV is critical for REDD+; therefore, the UNFCCC should support actions to make data more freely available.

^{xviii} This paragraph is useful for implementation of our suggested paragraph 6. The flow of REDD+ financing is dependent on the UNFCCC providing an international verification process. Without such verification donors will be forced to create their own MRV processes, increasing the burden on REDD+ countries.

^{xix} Measurements in CO₂eq allow for outcomes to be compared with RL/RELS and therefore provides the basis of results-based actions. The choice to MRV co-benefits should be up to each country's discretion. Note that safeguard information systems already allow for the monitoring of safeguards and associated co-benefits.

actions [~~which preserve and enhance the multiple benefits of forests including adaptation, poverty alleviation, biodiversity and secure livelihoods~~] [~~verifying anthropogenic forest-related emissions by sources and removals by sinks, forest carbon stocks, and forest carbon stock and forest area changes resulting from the implementation of the activities~~] referred to in decision 1/CP.16, paragraph [70] [73] [~~taking into account paragraph 71(b)~~], with the aim of completing its work on this matter at its [~~thirty-seventh~~] [~~thirty-ninth~~] session and reporting to the Conference of the Parties at its [~~eighteenth~~][~~nineteenth~~] session on progress made, including any recommendation for a draft decision on this matter;]^{xx}

15. [~~Also encourages Parties to develop a system for measuring, reporting and verifying under the joint mitigation and adaptation approach for the integral and sustainable management of forests.~~]]^{xxi}

^{xx} Measurements and reporting for the multiple benefits of forests could be integrated into ongoing REDD+ efforts. Because this is optional they should be included as appropriate according to national circumstances, and additional guidance from SBSTA is not necessary.

^{xxi} Although the MRV system for the joint mitigation and adaptation approach for the integral and sustainable management of forests may include *more* than REDD+ approaches, it should *at least* comply with the guidelines in this decision and does not need to be singled-out in this document.