



**Members of the Ecosystems Climate Alliance**  
**[www.ecosystemsclimate.org](http://www.ecosystemsclimate.org)**

4 November 2010

Achim Steiner  
Executive Director  
UN Environment Programme

cc: Peter Holmgren, Director, Climate, Energy and Tenure Division  
Food and Agriculture Organization of the UN

cc: Veerle Vandeweerd, Director, Energy and Environment Group, UNDP

cc: Ibrahim Thiaw, Director, Division of Environmental Policy Implementation, UNEP

cc: Yemi Katerere, Head of the UN-REDD Programme Secretariat

Dear Mr Steiner,

We are writing to you in our capacity as members of the Ecosystems Climate Alliance<sup>1</sup> in response to the UN-REDD Programme Strategy 2010-2015, to be discussed at the UN-REDD Programme 5th policy board meeting.

Overall, we are encouraged by several positive aspects of the Programme, including: the work area on national REDD+ governance and its emphasis on transparency, inclusiveness and effectiveness; the focus on developing national REDD strategies with strong stakeholder participation; ensuring full and effective engagement of Indigenous Peoples, consistent with UN conventions and declarations on rights and participation; and support for monitoring systems for safeguards.

However, there are other elements concerning "multiple benefits" for which UNEP is the lead agency, which threaten to undermine these positive aspects, and which we wish to alert you to.

We believe that section 5.4 on "ensuring multiple benefits" on environmental benefits should be fortified by providing stronger direction to the intended work. For example, "key activities" should repeat the identified need to focus on protection of natural forests in national REDD strategies, and the need to restore degraded forests, which is not mentioned anywhere at the moment.

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<sup>1</sup> ECA is an alliance of registered UNFCCC observer organisations currently comprising the Australian Orangutan Project, Environmental Investigation Agency, Global Witness, Humane Society International, Nepenthes, Rainforest Action Network, Rainforest Foundation Norway, The Rainforest Foundation U.K., Wetlands International and The Wilderness Society.

Even more problematic is the inclusion of support for “reduced impact logging” in section 5.6, an activity that, when introduced into intact natural forests, is clearly incompatible with the objective of reducing emissions. Scientific literature, as surveyed by UN-REDD’s recent report “*A Safer Bet for REDD Resilience*”, clearly indicates the climate benefits of maintaining intact natural forests. As concluded by “*A Safer Bet*”, “there is good evidence that tropical forest intactness will aid resilience of its carbon stocks to climate change”<sup>2</sup>, clearly indicating that preventing the expansion of logging into intact natural forest offers the best opportunity for achieving reductions. Any logging which opens up intact forests – regardless of whether it is “reduced impact”, certified, or other – is carbon emissive and leaves the remaining forest more vulnerable to further degradation and conversion to other uses. This is particularly true where forest governance is weak. Intact natural forests also have the greatest resilience to climate change, an important consideration in relation to permanence and adaptation. Scientific literature as well as reports by UNEP-WCMC and the Convention on Biological Diversity, has found that there is a strong relationship of biodiversity with carbon storage – protecting intact natural forests high in biodiversity delivers concurrent carbon and biodiversity benefits. With less than a quarter of the world’s forests remaining in an intact state, we do not think that it is appropriate to support logging in these areas using a fund designed to reduce emissions from deforestation and forest degradation.

In order to make the most effective use REDD funds, activities should be prioritised according to a **hierarchy of actions**, with those which are most clearly associated with reducing emissions at the top<sup>3</sup>. Logically, protecting natural forests precludes the introduction of emissive activity and maintains biodiversity, restoration activities seek to halt emissions and increase sequestration whilst restoring biodiversity, and sustainable management is applied to emissive activities to restrain ongoing emissions and biodiversity impacts in some measure. Listing activities in this hierarchy and in particular protecting intact natural ecosystems as the top priority is recommended. Support for reducing the impact of logging must be restricted to areas of forest which have already been subjected to logging and designated for ongoing management as logging zones. We suggest that this hierarchy be reflected in the objectives and activities of the proposed work plan.

We are also concerned by the inclusion of the term “sustainable forest management” within the UN-REDD 2010-2015 programme objective. This term remains poorly defined and requires clarification.

We look forward to working with you to resolve these concerns while building upon the positive gains achieved to date.

Yours sincerely,

**Global Witness**

**The Wilderness Society**

**Rainforest Foundation Norway**

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<sup>2</sup> Available at: <http://www.unep-wcmc.org/climate/pdf/Resilience%20review%20101018.pdf>

<sup>3</sup> This proposed hierarchy of actions under REDD+ is supported by all members of ECA.

## **About the Ecosystems Climate Alliance**

The Ecosystems Climate Alliance is an alliance of NGOs committed to keeping natural terrestrial ecosystems intact and their carbon out of the atmosphere.

We work to ensure this is done in a way which is equitable, transparent, consistent with the rights of indigenous peoples and local communities, and which takes place alongside deep and urgent cuts in fossil fuel emissions. We advocate a range of policies which will avoid degrading terrestrial carbon stores, protect ecosystems and biodiversity, and restore their carbon carrying capacity and ecological function, as essential components of greenhouse gas mitigation and adaptation to climate change. This must be supported by robust monitoring, fair and effective governance, proper enforcement and action to curb the demand for forest and agricultural products.

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