



# **COP30 FOREST ACTION PLAN**

**A Proposal to Improve Efficiencies under  
the UNFCCC to Implement Action to Halt  
and Reverse Deforestation and Forest  
Degradation by 2030**

**GREENPEACE**

**Greenpeace Discussion Paper**

# **COP30 FOREST ACTION PLAN**

**A Proposal to Improve Efficiencies under the UNFCCC to implement action to halt and reverse deforestation and forest degradation by 2030**

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## Introduction

The Paris Climate Agreement has been hailed as a significant milestone in the international climate policy landscape. Now, as we approach its ten-year anniversary, the systems established in Paris may be in full swing, but the ambition and implementation remains seriously inadequate. The world continues on a path toward climate and biodiversity catastrophe. Earth's life support systems are faltering under ecosystem exploitation and destruction, fossil fuel emissions continue unabated, and key tipping points are becoming an increasingly unpredictable danger to the long-term survival of life on Earth. It has been ten years of negotiations on rules and procedures said to be designed for urgent climate action and implementation, many of which are dangerously flawed, and major polluting countries continue to do too little to deliver meaningful progress toward mitigation and adaptation. Besides urgently reducing fossil fuel emissions, the protection and restoration of ecosystems to increase CO<sub>2</sub> sink potential requires urgent attention as an implementation action that can drive multiple benefits and synergies to address other challenges related to planetary boundaries<sup>1</sup>.

The protection of forests and other ecosystems is a key feature of the Paris Agreement. The Preamble notes the importance of ensuring the integrity of all ecosystems, including oceans, and the protection of biodiversity, and 'climate justice'<sup>2</sup>. Article 5 requires that Parties take actions to conserve and enhance forests<sup>3</sup>; Additionally, the Global Stocktake (GST) applies across all sectors, including the land sector, to track progress and identify priority areas. A key GST milestone was achieved in 2023, at COP28, when the first Global Stocktake (GST1) secured an outcome<sup>4</sup> which recognises the importance of enhanced efforts towards halting and reversing deforestation and forest degradation by 2030<sup>5</sup>. If the Paris Agreement is to be considered credible, countries must now work together to operationalise this GST1 decision, building on other similar UN initiatives and pledges, including the United Nations Strategic Plan for Forests 2017 – 2030<sup>6</sup>, the 2014 New York Declaration on Forests<sup>7</sup> (NYDF) and the 2021 Glasgow Leaders' Declaration on Forests and Land Use<sup>8</sup> (GLD). Adding to these calls from the highest levels of Government, the incoming Brazilian COP30 Presidency, as a part of the Global *Mutirão*<sup>9</sup> against climate change, has now also called<sup>10</sup> on all public and private stakeholders to work together towards the full implementation of efforts towards halting and reversing deforestation and forest degradation by 2030.

This Greenpeace Discussion Paper is meant for government negotiators and non-state actor experts and advocates working on the critical task of halting and reversing deforestation and forest

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<sup>1</sup> van Vuuren, D.P., Doelman, J.C., Schmidt Tagomori, I. *et al.* Exploring pathways for world development within planetary boundaries. *Nature* 641, 910–916 (2025). <https://doi.org/10.1038/s41586-025-08928-w>

<sup>2</sup> See Preamble of the Paris Agreement here: [https://unfccc.int/sites/default/files/english\\_paris\\_agreement.pdf](https://unfccc.int/sites/default/files/english_paris_agreement.pdf)

<sup>3</sup> Article 5 of the Paris Agreement here: [https://unfccc.int/sites/default/files/english\\_paris\\_agreement.pdf](https://unfccc.int/sites/default/files/english_paris_agreement.pdf)

<sup>4</sup> Outcome of the First Global Stocktake here: [https://unfccc.int/sites/default/files/resource/cma2023\\_16a01E.pdf](https://unfccc.int/sites/default/files/resource/cma2023_16a01E.pdf)

<sup>5</sup> Paragraph 33 of the First Global Stocktake here: [https://unfccc.int/sites/default/files/resource/cma2023\\_16a01E.pdf](https://unfccc.int/sites/default/files/resource/cma2023_16a01E.pdf)

<sup>6</sup> See General Assembly resolution 71/285

<sup>7</sup> New York Declaration on Forests here: <https://forestdeclaration.org/about/new-york-declaration-on-forests/>

<sup>8</sup> Glasgow Leaders Declaration on Forests and Land Use:

<https://webarchive.nationalarchives.gov.uk/ukgwa/20230418175226/https://ukcop26.org/glasgow-leaders-declaration-on-forests-and-land-use/>

<sup>9</sup> *Mutirão* is a term derived from the Indigenous Tupi-Guarani language meaning a group coming together to work on a shared task, or a collective effort, and has been adopted by the COP30 Brazilian Presidency as an overarching theme of COP30. See here: <https://cop30.br/en/news-about-cop30-amazonia/burkinidi-minka-and-balu-wala-learn-about-the-many-versions-of-cop30s-global-mutirao>

<sup>10</sup> See the third letter of the incoming COP30 President, which states that all public and private stakeholders should work together towards the full implementation of the Paris Agreement by taking into account the findings of the GST. This includes the global calls for efforts towards halting and reversing deforestation and forest degradation by 2030 here: <https://cop30.br/en/brazilian-presidency/letters-from-the-presidency/third-letter-from-the-presidency>

degradation by 2030. It is intended to support a transformative COP30 forest outcome in Belém, Brazil, later this year. There is little time left for the UN Climate Convention and the mechanisms within the Paris Agreement to make a meaningful contribution to the achievement of this goal, which is particularly challenging given the fragmented and uncoordinated way forests and ecosystems are currently being approached both at the multilateral level throughout the UN, and within the UNFCCC. There are unconnected tracks of work throughout the UNFCCC technical Subsidiary Bodies (SBs), which raise specific issues concerning forests and ecosystems, including: Matters relating to the GST; the Mitigation Work Programme (MWP); the Just Transition Work Programme (JTWP); Matters relating to Adaptation; and Agriculture. There are also other unconnected relevant tracks under the Paris Agreement, including Further Guidance on Features of Nationally Determined Contributions (NDCs), finance mobilisation, and the definition of cooperative approaches under Article 6 (markets and non-markets). And 10 years on from its agreement in Paris, Article 5 has never been fully operationalised. And despite calls for many years<sup>11</sup>, there remains no clear pathway for the essential joint work across the three Rio Conventions.

If there is to be any hope of achieving the goal of halting and reversing deforestation and forest degradation by 2030 there is a need for a serious shift in the way things are being done and a far greater appreciation in the UNFCCC of the importance of protecting and restoring forest ecosystem integrity and the complex web of life (biodiversity) that underpins their stability. To do this, the UNFCCC, through its Conference of the Parties serving as the Meeting of the Parties under the Paris Agreement (CMA), needs to establish a new dedicated 5-year 'Action Plan for Implementation' to halt and reverse deforestation and forest degradation by 2030 (API4Forests), and foster synergistic climate and biodiversity outcomes in forests at COP30. A dedicated API4Forests would address the current fragmentation, promote coordination, alignment, and equitable ambition, inform the existing workstreams, and create a streamlined and efficient technical programme of work dedicated to implementation. It would promote efficiency, save limited time and resources, prevent overlap and conflicting outcomes, and allow full engagement of all relevant countries, whilst creating a discrete process tailored to addressing and accommodating the complexities unique to forests, other ecosystems, and Indigenous Peoples & Local Communities (IP&LCs).

The overarching objective of this proposal is to drive full and equitable implementation of the outcomes of GST1 on halting and reversing deforestation and forest degradation by 2030. The API4Forests should be mandated by the CMA and established through a COP30 decision request to the Subsidiary Body for Implementation (SBI) as the UN Climate Convention's permanent body to support implementation. Undertaking technical implementation-oriented work in this way through a dedicated track in the SBI should be well coordinated across other relevant existing work streams. The coordination of work should take place at the CMA level, and through the Chairs of the Subsidiary Bodies, ensuring relevant stakeholder engagement.

## An Action Plan for Implementation on Forests

This paper holds a proposal that the CMA requests the SBI to commence a 5-year work programme for implementation on *'Approaches for Halting and Reversing Deforestation and Forest Degradation by*

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<sup>11</sup> The importance of joint work across the Rio Conventions has been identified in UNFCCC COP decisions since COP25. See Rogers B.M., Mackey B., Shestakova T.A., Keith H., Young V., Kormos C.F., DellaSala D.A., Dean J., Birdsey R., Bush G., Houghton R.A. and Moomaw W.R. (2022) Using ecosystem integrity to maximise climate mitigation and minimise risk in international forest policy. *Front. For. Glob. Change*, Sec. Forest Management. <https://doi.org/10.3389/ffgc.2022.9292>. A Programme of Joint Work across the Rio Conventions is supported by General Assembly resolution 78/155 (December 2023), UNFCCC decisions 1/CP.25, 1/CMA.5, and 7/CMA.6 and CBD Decisions 16/22 on Biodiversity and Climate Change, and CBD/SBSTTA decision 23/3



2030'. It proposes 6 Action Items, intended to enhance efficiencies in approaching the complex subject of forests, and requests that the SBI should:

1. Take a comprehensive approach to **guide the implementation of national plans to end forest destruction and drive forest protection and restoration** by informing the ongoing tracks of work concerning the Mitigation Work Programme (MWP) and Features of NDCs, and ensure that NDCs and National Adaptation Plans (NAPs) reflect progress toward these goals.
2. **Recognise the role of IP&LCs** by guiding support to secure land rights and tenure for IP&LCs as essential measures to halt and reverse deforestation and forest degradation by 2030, and engage with the Local Communities and Indigenous Peoples Platform (LCIPP) and the COP30 Presidencies' International Indigenous Commission.
3. Draw on the provisions of GST1, which recognise the need for reform of multilateral financial architecture<sup>12</sup> and provide guidance on reforming financial systems, providing debt relief, and **enhancing high-integrity forest finance solutions**, shifting focus from carbon market-based approaches to approaches that retain high ecosystem integrity, restore degraded forests, and integrate mitigation, adaptation, and rights, including direct access to finance for IP&LCs.
4. **Address the drivers of deforestation and forest degradation**, and in doing so enhance understanding of the nexus between trade in forest-risk commodities, and climate change, transitional minerals, and the necessary just transition required for land sector communities.
5. Improve monitoring and accountability systems for addressing deforestation and forest degradation in all forest biomes through **enhanced dialogue and reporting mechanisms**, through the annual GST dialogues, the UAE Dialogue, the Biennial Transparency Reports (BTRs), and the development of guidance for best practices in monitoring and reporting forest degradation, and technical work on ecosystem integrity; and
6. Establish a legacy of **ongoing high-level political engagement to halt and reverse deforestation and forest degradation by 2030**, as well as contribute to joint work across the Rio Conventions including on alignment of national plans - NDCs, NAPs, and National Biodiversity Strategies and Action Plans (NBSAPs) under the Convention on Biological Diversity (CBD) – as well as scaling up public finance, and addressing the needs of IP&LCs.

There is no doubt that COP30 should ensure a high-ambition outcome on protecting forests and people. There is no more time to waste and there is high-level political momentum to build on<sup>13</sup>. This proposal for a COP30 decision in Belem for an Action Plan for Implementation does exactly that.

The following proposed Action Items provide a useful plan for implementation within the UNFCCC, which would include work undertaken across the CMA, the SBI as well as the existing ongoing work through the SBs as mentioned above. We anticipate that this 'Implementation Plan' / API4Forests would require a request from the CMA to the SBI, with technical work taking place within the SBI, and coordination taking place at the CMA level. We do not propose new work under the Subsidiary Body for Scientific and Technical Advice (SBSTA) to ensure efficiencies and emphasis remains on implementation. Many decades of research and scientific work has provided us with the knowledge and tools we need to get the job done. Now, it is all about implementation. We propose that the work across each of the Action Items below commences in 2026, at SB64, arising from **a COP30 / CMA7 outcome**, which states:

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<sup>12</sup> Paragraph 6 Decision 1.CMA/6 - New collective quantified goal on climate finance

<sup>13</sup> Glasgow Leaders Declaration on Forests and Land Use:

<https://webarchive.nationalarchives.gov.uk/ukgwa/20230418175226/https://ukcop26.org/glasgow-leaders-declaration-on-forests-and-land-use/>

*“The CMA requests the Subsidiary Body for Implementation (SBI) to commence a 5-year Implementation Plan at its 64th meeting concerning approaches for halting and reversing deforestation and forest degradation by 2030, to enhance support and investment, including through financial resources, technology transfer, and capacity-building under the following Action Items for Implementation:*

- 1. Guidance on the implementation of national plans to halt and reverse deforestation and forest degradation by 2030;*
- 2. Measures concerning land rights and tenure of Indigenous Peoples and local communities as key elements to halting and reversing deforestation and forest degradation by 2030;*
- 3. Guidance on financial systems reform, debt relief, and scaling up high-integrity finance for forests to halt and reverse deforestation and forest degradation by 2030 and to maintain and restore forest ecosystem integrity;*
- 4. Addressing drivers of deforestation and forest degradation related to agriculture and commodities trade;*
- 5. Improving monitoring and reporting systems for deforestation and forest degradation through dialogue and accountability; and*
- 6. Enhancing ‘International Cooperation’ to maintain high-level political engagement and synergies across the Rio Conventions to halt and reverse deforestation and forest degradation by 2030 and to align climate action in the land sector with the Kunming-Montreal Global Biodiversity Framework”.*

#### **Action Item 1: Guidance on the implementation of national plans to halt and reverse deforestation and forest degradation by 2030**

- 1. The Guidance should inform the work on Further Guidance on Features of NDCs<sup>14</sup> to support countries in updating their NDCs and LULUCF sector targets.* Updates to NDCs should show progress on actions taken at the national level to halt and reverse deforestation and forest degradation by 2030 towards improved action to increase forest protection and restoration, and how countries’ preparation of their NDC has been informed by the outcomes of the GST<sup>15</sup>. Improved guidance should support the definition of ambitious national LULUCF goals, address flawed carbon accounting in defining the role of forests in climate target setting<sup>16</sup>, and provide guidance on how to improve LULUCF sector goal implementation through new funding programs, guidance on spatial planning<sup>17</sup>, shifting of subsidies, capacity building, and how to align national climate

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<sup>14</sup> A submissions process has been underway concerning future guidance for features of NDCs referred to in paragraph 26 of decision 1/CP.21. Several countries place emphasis on detailing how to take GST ‘calls forward’ and how their NDC supports the outcomes of paragraph 33 concerning halting and reversing deforestation and forest degradation by 2030, including AOSIS, Colombia, the EU, Panama and the UK. See here for submissions: <https://unfccc.int/documents/644017>

<sup>15</sup> As per decision 4/CMA.1, annex I, para. 4(c)

<sup>16</sup> See Greenpeace publication, Europe’s [Green] Recovery. As if the Planet Mattered, on the subject of carbon accounting here: [chrome-extension://efaidnbmninnkpcjpcglclefindmkaj/https://www.greenpeace.de/publikationen/20201022\\_greenrecovery\\_f\\_es.pdf](chrome-extension://efaidnbmninnkpcjpcglclefindmkaj/https://www.greenpeace.de/publikationen/20201022_greenrecovery_f_es.pdf)

<sup>17</sup> See Target 1 of the 2030 Kunming Montreal Global Biodiversity Framework: Plan and Manage all Areas To Reduce Biodiversity Loss, which states: Ensure that all areas are under participatory, integrated and biodiversity inclusive spatial planning and/or effective management processes addressing land- and sea-use change, to bring the loss of areas of high biodiversity importance, including ecosystems of high

legislation LULUCF goals with other relevant laws. Further guidance should also address the role of land conflicts under increasing climate impacts driven by land-intensive industries like meat, dairy, biomass production and transitional minerals.

2. *The Guidance should also inform the ongoing work under the Mitigation Work Programme (MWP).* The MWP should take a broad approach to underpin the API4Forests, and include work concerning ecosystems integrity, climate-biodiversity synergies, and scaling up support for tenure for IP&LCs. The Guidance should also inform the MWP on the exclusion of land sector-related 'dangerous distractions' and 'false solutions', which may create a barrier to achieving the 2030 target of halting and reversing deforestation and forest degradation, such as industrial logging in primary old-growth forests, large-scale afforestation, commercial plantations, large-scale woody biomass use and other approaches to carbon dioxide removal (CDR), forest-related credits for carbon markets, including under Article 6.4, and bioenergy with carbon capture and storage (BECCS)<sup>18</sup>, and promote equitable ambition and alignment across all forest biomes.
3. *The Guidance should inform how National Adaptation Plans & the Global Goal on Adaptation can support the goal of halting and reversing deforestation and forest degradation by 2030.* The importance of ecosystem-based adaptation should not be overlooked. The Glasgow–Sharm el-Sheikh work programme on the Global Goal on Adaptation<sup>19</sup> (GGA), also a 2030 target, includes a dedicated target to reduce climate impacts on ecosystems and biodiversity and towards accelerating the use of ecosystem-based adaptation and nature-based solutions<sup>20</sup>. This provision and the overlap between mitigation and adaptation actions further supports the need for holistic and synergistic approaches, addressed in parts under Article 6.8 Non-Market Mechanisms<sup>21</sup>. The Guidance should inform how National Adaptation Plans (NAPS) should be updated and revised to show progress towards achieving this target.
4. *Guidance on alignment of NDCs, NAPs and NBSAPs to support joint work across the Rio Conventions.* Alignment of these national plans would support consistency in reporting through the Conventions, and demonstrate progress and needs (including financial, technological and capacity needs) across the conventions through synergistic approaches and actions to halt and reverse deforestation and forest degradation by 2030. To be effective, aligned national plans should be submitted in 2026, and show progress towards achieving the targets to halt and reverse deforestation and forest degradation by 2030.

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ecological integrity, close to zero by 2030, while respecting the rights of indigenous peoples and local communities. See here: <https://www.cbd.int/gbf/targets>

<sup>18</sup> Dooley, K. et al. (2018) Missing Pathways to 1.5°C: The role of the land sector in ambitious climate action. Climate Land Ambition and Rights Alliance. [www.climateandambitionrightsalliance.org/report](http://www.climateandambitionrightsalliance.org/report)

<sup>19</sup> Decision 2/CMA.5

<sup>20</sup> UN Environment Assembly 5 (UNEA 5.2) Resolution 5 defines the concept of nature-based solutions as actions to protect, conserve, restore, sustainably use and manage natural or modified terrestrial, freshwater, coastal and marine ecosystems and calls for more collaboration and resources. See here: <https://www.unep.org/resources/resolutions-treaties-and-decisions/UN-Environment-Assembly-5-2>

<sup>21</sup> See Greenpeace Discussion Paper: Match-Making Community-Led Climate Action: Kick-Starting a Course Correct: A Vision for International Cooperation under the Paris Agreement beyond Carbon Markets. Here: [chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.greenpeace.org/static/planet4-international-stateless/2023/12/c610d444-20231130\\_match-makingcommunity-ledclimateaction\\_ds\\_small.pdf](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.greenpeace.org/static/planet4-international-stateless/2023/12/c610d444-20231130_match-makingcommunity-ledclimateaction_ds_small.pdf)

## Action Item 2: Measures concerning land rights and tenure of Indigenous Peoples and local communities as a key measure to halting and reversing deforestation and forest degradation by 2030

1. *The SBI should be informed by the COP30 International Indigenous Commission and support the scaling up of support for securing land rights of Indigenous Peoples and local communities.* The incoming Brazilian COP30 Presidency has launched an International Indigenous Commission<sup>22</sup>, as a function of its Indigenous Peoples Circle, intended to recognise the contributions of Indigenous Peoples to addressing climate change. It is important that this initiative is not disconnected from the negotiations on relevant matters, especially concerning halting and reversing deforestation and forest degradation by 2030 and the importance of security of land rights and tenure for IP&LCs.
2. *The SBI should engage with the Local Communities and Indigenous Peoples Platform (LCIPP) of the UNFCCC about halting and reversing deforestation and forest degradation.* The LCIPP has been instrumental in advancing meaningful engagement of IP&LCs in the UNFCCC. Whilst the new Work Programme agreed at COP29 in Baku for the period 2025 – 2027<sup>23</sup> (Baku Work Programme) makes no direct reference to the GST or the importance of halting and reversing deforestation and forest degradation by 2030, there are many provisions where the role of IP&LCs can be highlighted through case studies, reports and recommendations. Coordination between the SBI and the LCIPP to recognise the important role of IP&LCs will be an important part of achieving this goal.
3. *Ensure programmes for capacity building dedicated to supporting IP&LC led organisations.* Paragraph 34 of the GST 1 decision notes the need for enhanced support and investment, including through capacity-building, including through south-south exchanges, to support the goal of halting and reversing deforestation and forest degradation by 2030. Such capacity-building programmes should support institutional strengthening of IP&LC organisations for direct access and scaled-up resourcing, and technical support for project development and implementation, including related to independent monitoring.

## Action Item 3: Guidance on financial systems reform, debt relief, and scaling up high-integrity finance for forests to halt and reverse deforestation and forest degradation by 2030 and to maintain and restore forest ecosystem integrity

1. *Climate finance, and the financial mechanisms under the UNFCCC should prioritise the mobilisation of finance to halt and reverse deforestation and forest degradation by 2030.* The COP29 decision on the New Collective Quantified Goal (NCQG) on Climate Finance reaffirms the outcome of GST1<sup>24</sup>, and recognises the need for reform of the multilateral financial architecture, including unsustainable debt levels<sup>25</sup>. Research shows that debt is a major driver of extractivism in developing countries, including deforestation and forest degradation<sup>26</sup>. Ongoing efforts to mobilise climate finance should ensure nature and rights

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<sup>22</sup> See here: <https://cop30.br/en/news-about-cop30-amazonia/cop30-will-showcase-indigenous-territories-as-part-of-the-fight-against-the-climate-crisis>

<sup>23</sup> See the Baku Work Programme 2025 – 2027 here: <https://lcipp.unfccc.int/about-lcipp/workplan-activities>

<sup>24</sup> Paragraph 2 of Decision 1.CMA/6 - New collective quantified goal on climate finance

<sup>25</sup> Paragraph 6 Decision 1.CMA/6 - New collective quantified goal on climate finance

<sup>26</sup> Jessica Dempsey, Audrey Irvine-Broque, Tova Gaster, Lorah Steichen, Patrick Bigger, Azul Carolina Duque, Amelia Linett, George Porto Ferreira, and Nicole Kaechele, “Exporting Extinction: How the International Financial System Constrains Biodiverse Futures,” 2024, The Centre for Climate Justice, Climate and Community Project, and Third World Network. See here: <https://climatejustice.ubc.ca/news/exporting-extinction-how-the-international-financial-system-constrains-biodiverse-futures/>



priorities are at the heart of financial systems reform, and through initiatives supported by the UNFCCC Financial Mechanisms, especially the Green Climate Fund (GCF). The UNFCCC Standing Committee on Finance (SCF) should prioritise enhanced understanding as to finance related to halting and reversing deforestation and forest degradation through future, and ongoing work concerning finance for forests, and an SCF Forum should be held on the matter in 2027 to inform the first Biennial Report of the SCF concerning the NCQG in 2028.

2. *Shift emphasis away from carbon market-based approaches to non-carbon-market-based financial mechanisms and synergistic approaches.* For too long, resources and political capital have been placed on building a forest carbon market to reduce deforestation and forest degradation. Yet, after decades, and billions of dollars invested, little progress has been made. Forest carbon markets are increasingly being identified as a dangerous false solution<sup>27</sup>, and efforts to continuously promote existing flawed systems<sup>28</sup>, including through Articles 6.2 and 6.4 will likely prove to be too little too late for a 2030 target. The SBI should increase emphasis and investment in non-carbon-market approaches and non-carbon benefits through holistic and synergistic approaches, which incorporate mitigation, adaptation, and rights, such as those being developed under Article 6.8 and potentially through initiatives such as the Tropical Forests Forever Facility (TFFF), with broad engagement of stakeholders, including IP&LCs, including through improved access for non-party stakeholders.
3. *Support direct access to finance for Indigenous Peoples and local communities to the financial mechanisms of the UNFCCC.* For many years, IP&LCs have made consistent calls for direct access to the UNFCCC financial mechanisms, in particular the Green Climate Fund (GCF). This has not yet occurred, and the GCF and other financial mechanisms of the UNFCCC should take steps urgently to ensure direct access for scaling up of funds for IP&LCs aligned with the Principles & Guidelines for Direct Access Funding for Indigenous Peoples' Climate Action, Biodiversity, Conservation, and Fighting Desertification for a Sustainable Planet<sup>29</sup>. Direct access and management of funding will ensure that resources effectively support the self-determined needs and solutions of IP&LCs<sup>30</sup>.
4. *The SBI should recommend that the UAE Dialogue include a dedicated track of discussions concerning finance for halting and reversing deforestation and forest degradation by 2030.* It is recognised that there is a need for enhanced support and investment, including through financial resources<sup>31</sup>, and the UAE Dialogue has been established to address exactly this. A dedicated track of work within the UEA Dialogue should consider a broad range of approaches to funding halting and reversing deforestation and forest degradation by 2030, both State and Non-State, including debt cancellation, and reform and repurposing of harmful subsidies that are driving deforestation and forest degradation.

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<sup>27</sup> Jones, P.G. and Lewis, S.L. 2023. Forest carbon offsets are failing: Analysis reveals emission reductions from forest conservation have been overestimated. *Science*, 24 Aug 2023, Vol 381, Issue 6660. pp. 830-831 DOI: [10.1126/science.adj6951](https://doi.org/10.1126/science.adj6951)

<sup>28</sup> Haya, B. K., Alford-Jones, K., Anderegg, W. R. L., Beymer-Farris, B., Blanchard, L., Bomfim, B., Chin, D., Evans, S., Hogan, M., Holm, J. A., McAfee, K., So, I. S., West, T. A. P., & Withey, L. (2023, September 15). Quality assessment of REDD+ carbon credit projects. Berkeley Carbon Trading Project. <https://gspp.berkeley.edu/research-and-impact/centers/cepp/projects/berkeley-carbontrading-project/REDD+>

<sup>29</sup> Principles & Guidelines for Direct Access Funding for Indigenous Peoples' Climate Action, Biodiversity Conservation and Fighting Desertification for a Sustainable Planet.

<sup>30</sup> Ibid

<sup>31</sup> Paragraph 34 of the First Global Stocktake here: [https://unfccc.int/sites/default/files/resource/cma2023\\_16a01E.pdf](https://unfccc.int/sites/default/files/resource/cma2023_16a01E.pdf)

#### Action Item 4: Addressing drivers of deforestation and forest degradation related to agriculture and commodities trade

1. *Support UNFCCC discussions on trade and climate change, related to demand and supply side drivers of deforestation and forest degradation.* The Government of Brazil, together with China, India, and South Africa (BASIC) has proposed a new agenda item related to trade measures, and identifying the ways to promote international cooperation in line with the first GST outcome. This agenda item has been addressed within the context of the GST under the section on International Cooperation<sup>32</sup>. A roundtable on trade and climate change was considered in the final draft decision from COP29. Such a roundtable and dialogue on trade and climate change should be supported by the API4Forests, and to ensure inclusion of discussions related to drivers of deforestation and forest degradation; deforestation, and forest degradation-free value chains; and sharing lessons related to laws and regulations to address illegal logging, deforestation, and degradation.
2. *The Just Transition Work Programme (JTWP) should place emphasis on ensuring a just transition away from ongoing deforestation and forest degradation.* To achieve the 2030 target of halting and reversing deforestation and forest degradation will involve a major transition in a short period of time, impacting significantly on IP&LCs, including smallholder farmers critical to deforestation-free value chains. Rural communities working in the land sector, and reliant on forests and ecosystems, are highly vulnerable to climate change and often lack security of tenure for their land. There are major and increasing pressures on communities already, including land ownership conflicts, livelihoods, and lack of recognition of rights, also in the context of transitional minerals extraction. The work of the SBI should inform the ongoing work on the JTWP on a range of issues, including those related to changes in regulations at the international level and support capacity building<sup>33</sup> including through south-south exchanges, for smallholder farmers, including Indigenous smallholders, to meet obligations under new regulations for deforestation-free commodities, and support the need for a living income and security of land tenure.
3. *The API4Forests should inform the Sharm el-Sheikh Joint Work on Implementation of Climate Action on Agriculture and Food Security.* In doing so, the work under the SBI should address agroecological transitions, land use change drivers, and their interface with forests, and build common ground with food system transformation goals under COP30 and the UN Food Systems Summit follow-up.

#### Action Item 5: Improving monitoring and reporting systems for deforestation and forest degradation through dialogue and increased accountability

1. *GST1 implementation should enhance emphasis on accountability through dialogue and reporting.* Without imposing additional burdens on countries, an SBI track of work on halting and reversing deforestation and forest degradation by 2030 could support the annual GST dialogue<sup>34</sup> and the UAE Dialogue, to facilitate the sharing of knowledge and

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<sup>32</sup> Paragraph 154 of GST1 outcome Recognises that Parties should cooperate on promoting a supportive and open international economic system aimed at achieving sustainable economic growth and development in all countries and thus enabling them to better to address the problems of climate change, noting that measures taken to combat climate change, including unilateral ones, should not constitute a means of arbitrary or unjustifiable discrimination or a disguised restriction on international trade. See here: [https://unfccc.int/sites/default/files/resource/cma2023\\_16a01E.pdf](https://unfccc.int/sites/default/files/resource/cma2023_16a01E.pdf)

<sup>33</sup> Paragraph 34 of GST1 notes the need for enhanced support and investment, including through capacity-building. See here: [https://unfccc.int/sites/default/files/resource/cma2023\\_16a01E.pdf](https://unfccc.int/sites/default/files/resource/cma2023_16a01E.pdf)

<sup>34</sup> Paragraph 187, decision 1/CMA.5

good practices. The first annual GST Dialogue was held in June 2024, and the second one is expected to take place in June 2025. These annual events can provide important moments for updates from Parties and Non-State Actors on progress toward halting and reversing deforestation and forest degradation by 2030. Whilst the GST Dialogue focuses mostly on NDC implementation, additional open and participatory dialogue processes should be established through the SBI to support the sharing of lessons and exchange of information that support implementation and foster alignment across all forest biomes.

2. *Biennial Transparency Reports should include information on progress towards halting and reversing deforestation and forest degradation by 2030.* Reporting under the Paris Agreement Enhanced Transparency Framework (ETF) through Biennial Transparency Reports (BTRs) will take place every two years, creating useful opportunities for countries to inform on progress towards achieving the goal to halt and reverse deforestation by 2030, as well as on finance needed and provided. Building on experiences concerning REDD+, the SBI should provide guidance through the API4Forests and support capacities of Parties concerning future BTRs, and this information can inform progress concerning implementation of GST1, inform GST2, and enable opportunities for financial, and other implementation support for countries, where needed. Based on the first BTRs submitted in 2024 / 2025, improvements are needed in relation to the quality of input data; adopting more advanced estimation methods and uncertainty analysis; improving inventory completeness across time series, and emission categories and gases<sup>35</sup>. The SBI could focus its work around these areas, providing guidance specifically on BTR reporting on halting and reversing deforestation and forest degradation by 2030.
3. *The SBI should provide guidance on best practice for monitoring forest degradation.* Globally, the area of forests where ecological integrity was degraded is 10 times greater than the area that was deforested, at over 60 million hectares<sup>36</sup>. Hence, guidance for Parties on monitoring forest degradation to equitably and fully achieve the GST goal is crucial and should also be reported through BTRs. Such Guidance should relate to mapping forest road development, reduction in canopy cover and vegetation density, and the loss of big trees<sup>37</sup>.
4. *Work should be undertaken by the SBI as a part of the operationalisation of Article 5 and establish a Technical Expert Group on Ecosystems Integrity (TEG-EI) to support mitigation actions, which prioritise nature protection and the preservation of ecosystem integrity<sup>38</sup>.* The TEG-EI should follow other similar processes undertaken through the UNFCCC and meet intercessionally throughout the year, engage with State and Non-State Actors, experts, and IP&LCs, including through inputs concerning traditional, Indigenous and customary knowledge. It should develop methodologies, identify indicators and tools, and provide guidance to Parties to support the assessment and monitoring of the ecosystem integrity of carbon sinks and stocks and report on progress to contribute to halt and reverse deforestation and forest degradation by 2030 annually at each COP between now and 2030.

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<sup>35</sup> Martius, C.; Pingault, N. (2025) Are countries delivering on transparency? Key takeaways from the first Biennial Transparency Reports to the UNFCCC. See here <https://www.cifor-icraf.org/knowledge/publication/9366/>

<sup>36</sup> Forest Declaration Assessment Partners. (2024). Forests under fire: Tracking progress on 2030 forest goals. Climate Focus (coordinator and editor). Accessible at [www.forestdeclaration.org](http://www.forestdeclaration.org)

<sup>37</sup> See, for example, Global Forest Watch <https://data.globalforestwatch.org/documents/ff304784a9f04ac4a45a40f60bae5b26/about>; Forest Declaration Assessment <https://forestdeclaration.org/about/assessment/>; and Map Biomas <https://brasil.mapbiomas.org/en/>

<sup>38</sup> Article 5 of the Paris Agreement here: [https://unfccc.int/sites/default/files/english\\_paris\\_agreement.pdf](https://unfccc.int/sites/default/files/english_paris_agreement.pdf)

5. *The SBI should provide guidance on the alignment of traceability and transparency systems required for deforestation-free trade with other systems for monitoring forests and carbon.* Major advances have been made in forest monitoring systems in recent years. Emphasis through REDD+ has largely been on monitoring deforestation, with less emphasis on the more complex systems required for monitoring forest degradation and ecosystems integrity. GST1 notes the need for enhanced support and investment, including through technology transfer<sup>39</sup> in support of the goal to halt and reverse deforestation and degradation by 2030. These provisions should be operationalised through the API4Forests to build capacity and alignment across forest monitoring and systems of traceability and transparency, for all forest biomes, to foster more holistic, efficient, and accurate systems required for accountability, provision of finance, and access to deforestation and forest-degradation-free supply chains.

**Action Item 6. Enhancing International Cooperation to maintain high-level political engagement and synergies across the Rio Conventions to halt and reverse deforestation and forest degradation by 2030 and to align climate action in the land sector with the Kunming-Montreal Global Biodiversity Framework**

1. *The API4Forests should support joint work across the three Rio Conventions*<sup>40</sup>. A joint work programme<sup>41</sup> (JWP) should be established at the COP level across the three Conventions and the SBI could support the implementation of the JWP through the provision of workshops, roundtables, and dialogue on matters including the alignment of national plans (NDCs, NAPs, and NBSAPs); scaling up of finance, including public finance; alignment of approaches related to IP&LCs: and alignment on approaches concerning ecosystem integrity<sup>42</sup> and monitoring<sup>43</sup>.
2. *The ongoing work of the API4Forests should take into consideration and engage with relevant high-level political initiatives.* The incoming COP30 Presidency has already announced an intention to establish a 'Circle of Presidencies'<sup>44</sup> to honor and synthesize the legacies of previous COPs. COP30 should provide a dedicated High-Level Segment on halting and reversing deforestation and forest degradation by 2030 within the Circle of Presidencies and build on and complement other relevant high-level initiatives such as the GLD and the Forests & Climate Leaders' Partnership. Momentum that has been built through these initiatives launched by the UK COP26 and subsequent Presidencies and should be further enhanced, to coordinate and collaborate with the SBI to bring Ministers and Heads of State together at each COP to build and maintain momentum.

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<sup>39</sup> Paragraph 34 of GST1 here: [https://unfccc.int/sites/default/files/resource/cma2023\\_16a01E.pdf](https://unfccc.int/sites/default/files/resource/cma2023_16a01E.pdf)

<sup>40</sup> The importance of joint work across the Rio Conventions has been identified in UNFCCC COP decisions since COP25. See Rogers B.M., Mackey B., Shestakova T.A., Keith H., Young V., Kormos C.F., DellaSala D.A., Dean J., Birdsey R., Bush G., Houghton R.A. and Moomaw W.R. (2022) Using ecosystem integrity to maximise climate mitigation and minimise risk in international forest policy. *Front. For. Glob. Change*, Sec. Forest Management. <https://doi.org/10.3389/ffgc.2022.9292>

<sup>41</sup> A Programme of Joint Work across the Rio Conventions is supported by General Assembly resolution 78/155 (December 2023), UNFCCC decisions 1/CP.25, 1/CMA.5, and 7/CMA.6 and CBD Decisions 16/22 on Biodiversity and Climate Change, and CBD/SBSTTA decision 23/3

<sup>42</sup> See the Preamble of the Paris Agreement, which states *Noting the importance of ensuring the integrity of all ecosystems, including oceans, and the protection of biodiversity, recognised by some cultures as Mother Earth, and noting the importance for some of the concept of "climate justice", when taking action to address climate change.* Here: [https://unfccc.int/sites/default/files/english\\_paris\\_agreement.pdf](https://unfccc.int/sites/default/files/english_paris_agreement.pdf)

<sup>43</sup> Including through the Global Goal on Adaptation (GGA) Framework, the Kunming Montreal-Global Biodiversity Framework (KMGBP) Monitoring Framework, the UN Statistical Commission System of Environmental Economic Accounting (SEEA), the FAO Global Forest Resource Assessments (FRA) as well as human rights monitoring frameworks

<sup>44</sup> First Letter from the President of COP 30, Ambassador Andre Correa do Lago, here: <https://cop30.br/en/brazilian-presidency/letters-from-the-presidency/letter-from-the-brazilian-presidency>

## Conclusion

As the 2030 deadline to halt and reverse deforestation and forest degradation rapidly approaches, the need for a more efficient and coordinated response under the UNFCCC is urgent. Current approaches remain fragmented across multiple workstreams, resulting in duplication, inefficiencies, and missed opportunities for synergy. This proposal for an Action Plan for Implementation for Forests (API4Forests) at COP30 directly addresses these inefficiencies by offering a streamlined, purpose-built framework focused on implementation.

The API4Forests is designed to consolidate currently disparate forest-related discussions into a coherent five-year work programme under the Subsidiary Body for Implementation (SBI), which is coordinated with other ongoing work across the Paris Agreement and UNFCCC. Rather than creating new technical burdens, it enhances efficiency by integrating and informing existing mandates, aligning overlapping agendas, and avoiding redundant efforts. It will enable more effective use of limited time and resources, while ensuring that implementation efforts are mutually reinforcing across climate mitigation, adaptation, and biodiversity goals.

The six proposed action items for implementation focus on removing systemic barriers to implementation, such as fragmented finance, disconnected policy frameworks, and misaligned monitoring systems. By establishing clear technical guidance, promoting policy coherence (especially across NDCs, NAPs, and NBSAPs), and facilitating high-level political coordination, the API4Forests would ensure that Parties work smarter, not harder, toward the 2030 goal.

Critically, the plan avoids unnecessary expansion of technical processes—such as through SBSTA—and centers the work within existing structures to maximise impact. It prioritizes action over additional analysis and mobilises knowledge and capacity already available, including from Indigenous Peoples, local communities, and non-state actors.

In short, this proposal offers a practical and cost-effective approach to operationalise forest-related commitments under the Paris Agreement and its first GST outcome. It delivers what the UNFCCC now most urgently needs: an efficient, coordinated, and implementation-focused pathway to achieve the goal of halting and reversing deforestation and forest degradation by 2030. COP30 must seize this opportunity.