

FROM PROMISES TO ACTION AT COP30

Ending forest destruction by 2030

The 30th Conference of the Parties (COP30) to the UNFCCC, to be held in Belém, Brazil, represents a critical juncture for global climate action. Convening in the heart of the Amazon, a biome teetering on the edge of an irreversible tipping point, the summit is imbued with a symbolic and material urgency that cannot be overstated. The context for this "Amazon COP" is one of profound crisis. In 2024 alone, the world witnessed an alarming acceleration in the destruction of its vital ecosystems, with tropical primary forest loss surging to 6.7 million hectares in 2024, with five times more forests burning than in the previous years. This catastrophic trend serves as an unequivocal indictment of the inadequacy of current international approaches and the persistent failure to translate political commitments into tangible results.

As we rapidly approach COP30, it's essential to explore the potential for the COP to deliver an impactful outcome on protecting high-integrity forests and ecosystems and make a meaningful contribution to achieving the target of halting and reversing deforestation and forest degradation by 2030. Leaders must prioritise and deliver on this target, as enshrined in multiple pledges and the first GST (Global Stocktake) outcome.³

Since June 2025, the ICJ (International Court of Justice) has delivered a groundbreaking Advisory Opinion which causes a shift away from addressing climate change as a mere 'political issue' to a 'legal issue'. This should pressure responsible leaders to ensure their NDCs (Nationally Determined Contributions) presented towards COP30 in Belém are aligned with the 1.5 ambition agreed in the Paris Agreement, including action on ending the destruction of forest and ecosystems and securing and rebuilding natural carbon cycles. It should also require future UNFCCC negotiations to deliver a more efficient, more sector specific and more adequate response to ambition gaps in NDCs.

Recent public polling by Greenpeace in 17 countries across five continents shows that more than 80% of people surveyed consider forests critical in the fight against climate change and want their governments to do more to tackle deforestation. The most supported actions to achieve this are securing international agreements (77%) and a new global action plan to end deforestation (75%).⁴ These results prove that public support in key geographies for multilateral outcomes is strong and that people expect COP30 to deliver.

 $^{^{1}\} https://www.carbonbrief.org/experts-which-climate-tipping-point-is-the-most-concerning/point-is$

² https://gfr.wri.org/latest-analysis-deforestation-trends

³ Almost 40 governments and over 55 of the world's biggest companies signed the New York Declaration on Forests in 2014, committing to eliminate deforestation from the production of agricultural commodities, as well as halving the rate of deforestation no later than 2020, and to end natural forest loss globally by 2030. In 2017, the UN agreed on the 2017 – 2030 Strategic Plan for Forests to support halting and reversing deforestation and forest degradation. The Forest Declaration was re-launched in 2021 ahead of COP26 in Glasgow, with governments reaffirming the goal to end the loss and degradation of natural forests by 2030. In 2023, the outcome of the Global Stocktake (GST) decision at COP28 formally incorporated the Forest Declaration's pledge - to halt and reverse deforestation and forest degradation by 2030 as part of the UNFCCC text itself, expanding the commitment to halt forest loss by 2030 to all parties of the Paris Agreement

⁴ https://drive.google.com/file/d/190ys9fu552d596IfoQrDTzpMw4rgDStU/view

This briefing argues that the international community must raise its ambition beyond voluntary initiatives to achieve the 2030 target of halting and reversing deforestation and forest degradation. It proposes a concrete roadmap for COP30 to deliver substantive, structural change through two interrelated key mechanisms: an enhanced mandate to ensure synergies across the Rio Conventions to tackle the global environmental crises and a mandated UNFCCC Forest Action Plan for a more efficient, just and equitable implementation of existing forest commitments.

The Legal Obligation to Protect and Restore Ecosystems

On 23 July 2025, the ICJ delivered a historic Advisory Opinion concerning the 'Obligations of States in respect of Climate Change'. It is necessary now to consider the 2030 target to halt and reverse deforestation and forest degradation in the context of this groundbreaking ICJ-AO.

The ICJ-AO lays out⁶ that the climate change treaties set forth legally binding obligations for State parties to adopt measures to mitigate and adapt to climate change; to act with enhanced due diligence; that Annex 1 countries should take the lead; and actions should be taken having regard to CBDR-RC (Common But Differentiated Responsibilities and Respective Capabilities).

It found that Customary International Law also sets forth⁷ legally binding obligations for all States, without exception, including a duty to prevent significant harm to the environment and to use all means at their disposal to prevent activities carried out within their jurisdiction from causing significant climate harm; and a duty to co-operate with each other in good faith to prevent significant harm to the climate. The Court also found that States have obligations under international human rights law to respect and ensure the effective enjoyment of human rights by taking necessary measures to protect the climate system and other parts of the environment.

The ICJ further finds⁸ that a breach by a State of any of these obligations constitutes an internationally wrongful act, which may entail: (a) cessation of the wrongful actions or omissions; (b) providing assurances and guarantees of non-repetition; and (c) full reparation to injured States, including through compensation for climate-related losses in the form of restitution, compensation and satisfaction.

The ICJ-AO also underlines that nature has the right to maintain its essential ecological processes, and as such, States have an obligation to protect, restore and regenerate ecosystems, in line with the best available science and recognizing traditional knowledge.⁹

Whilst it may be argued that the ICJ-AO does not go so far as to impose a legally binding obligation on States to achieve the 2030 target simply arising from pledges made, it may be arguable that, as this target is based on science, as a necessary action to be taken to remain below 1.5 degrees and to prevent significant harm to the climate system and other parts of the environment (e.g. biodiversity, primary ecosystems), legally binding obligations do arise.



⁵ https://www.icj-cij.org/case/187

⁶ https://www.icj-cij.org/sites/default/files/case-related/187/187-20250723-pre-01-00-en.pdf

⁷ https://www.icj-cij.org/sites/default/files/case-related/187/187-20250723-pre-01-00-en.pdf

⁸ https://www.icj-cij.org/sites/default/files/case-related/187/187-20250723-pre-01-00-en.pdf

⁹ https://www.icj-cij.org/sites/default/files/case-related/187/187-20250723-pre-01-00-en.pdf (§283)

Elevating Synergies between the Conventions

The climate crisis, the biodiversity crisis and the land degradation crisis are three facets of a single, interconnected planetary emergency. Forests stand in the middle of them. Yet, they are governed by multiple multilateral agreements and three separate Rio Conventions - the UNFCCC, the CBD and the UNCCD, each with its own set of national implementation plans (NDCs, NBSAPs (National Biodiversity Strategies and Action Plans) and NAPs (National Action Plans), respectively). This siloed approach is a fundamental flaw in the architecture of global environmental governance, leading to conflicting policies, duplicated efforts and missed opportunities for synergistic action. However, recently the issue of reshaping the collaboration and coordination between the Rio Conventions, which were also born in Brazil, gained momentum. After The CBD and UNCCD and upon the UNFCCC to respond to their offer to enhance collaboration, it is now up to COP30 to respond constructively with a clear vision on how synergies could be maximised to attain more effective implementation of the obligations under the Rio Conventions. Parties agreed in Bonn to discuss this issue further in Belém, and a decision text on this matter is expected.

A JWP (Joint Work Programme) between the three Rio Conventions would be desirable, an AHTEG (Ad-hoc Technical Expert Group) could help to develop the details, and a stronger mandate for the JLG (Joint Liaison Group) could become the institutional center.¹⁶

To boost synergies for more ambitious implementation, COP30 should adopt a decision to provide the JLG with a new, enhanced mandate, transforming it from a liaison body into an active facilitator of synergistic implementation. It could be the place to turn for advice on how to effectively implement synergies and how to address those drivers that hinder them.

Voluntary initiatives: the role of the COP30 Action Agenda and the TFFF

In June 2025, during the Subsidiary Bodies meetings in Bonn, the incoming Brazilian COP30 Presidency launched the COP30 Action Agenda, which is intended to build on the Non-State Actor Platform launched at COP20 (the NAZCA Platform) and the Marrakesh Partnership launched at COP22. Through this Action Agenda, the COP30 Presidency, in close collaboration with the UNFCCC Secretariat, is seeking to formulate an implementation oriented approach to the GST1, including related to the 2030 target of halting and reversing deforestation and forest degradation.



¹⁰https://www.greenpeace.org/static/planet4-international-stateless/2025/06/fe19dc40-maximizing-synergies-legal-briefi

¹¹ https://www.unccd.int/convention/partners/rio-conventions

 $^{^{\}rm 12}$ https://unfccc.int/event/let-s-build-synergies-between-the-three-rio-conventions

¹³ https://www.cbd.int/doc/decisions/cop-16/cop-16-dec-22-en.pdf

¹⁴ https://www.unccd.int/sites/default/files/2025-03/8-cop16.pdf

 $^{^{\}rm 15}$ https://unfccc.int/sites/default/files/resource/dt_sb62_cooperation.pdf

 $^{^{16}} https://www.greenpeace.org/static/planet4-international-stateless/2025/06/fe19dc40-maximizing-synergies-legal-briefing.pdf$

This approach is shaped through action groups, including: Stewarding Forests, Oceans and Biodiversity, Transforming Agriculture and Food Systems; and Cross Cutting Enablers and Accelerators, including Climate and Trade.¹⁷

Whilst the Action Agenda is a good example of international cooperation across State and Non-State Actors, bringing together a range of different initiatives to support an implementation-oriented process, it does exist outside of the formal UNFCCC process of negotiations and is based on voluntary engagement. The lack of linkage to the UNFCCC process does raise concerns, including - but not limited to - the risk of weak implementation, lack of transparency and the inability to enforce decisions via negotiated agreements. Therefore, country-driven multilateral processes should remain the core business of COP30 instead of voluntary pledges and collaboration.

We recognize the Brazilian presidency's efforts to connect the Action Agenda with the GST1 outcomes, with indications that the solutions identified will be uploaded to a website and produced in a publication or 'Yearbook'. However, the impact and likely outcome or output of the Action Agenda remains unclear, with no guarantees that it will lead to concrete, timebound agreements, or that it will remain on the agenda of future COP presidencies. Whilst information sharing is always useful, the Action Agenda in its current state is not the right framework for putting in place a robust and meaningful Action Plan to achieve the 2030 goal of halting and reversing deforestation and forest degradation.

The incoming COP30 presidency has also placed a significant amount of emphasis on the delivery of a new financial mechanism to support tropical forests called the TFFF (Tropical Forests Finance / Forever Facility). As a matter of strategy, the TFFF has been deliberately detached from the finance discussions within the UNFCCC negotiation process, in order to avoid becoming 'bogged down' in the ongoing disagreements currently slowing progress on climate finance.

First presented at COP28, the TFFF is an ambitious proposal designed to mobilize large-scale, long-term finance for tropical forest countries that successfully maintain and potentially expand their forest cover. ¹⁸ Conceptually, it's an important move away from volatile and often ineffective carbon market mechanisms towards a performance-based, hectare-based payment system for standing forests. If done right, it could represent a welcome initiative, especially as a Global South led solution that acknowledges the role and needs of IPs&LCs (Indigenous Peoples and local communities). ¹⁹ It signals a much-needed recognition that forests have greater value standing than destroyed. ²⁰

A revised concept note has been released, and many of the recommendations provided by Greenpeace and other organisations have been taken up. For example, significant progress has been made on the rights and benefits for IPs&LCs, the frontline stewards of the world's forests. Despite the welcome improvements, the TFFF's foundational design continues to contain relevant weaknesses in environmental integrity, social safeguards, and financial stability that threaten to undermine its long-term effectiveness.²¹



 $^{^{17}} https://cop30.br/en/news-about-cop30/cop30-action-agenda-calls-for-accelerating-the-implementation-of-the-global-stocktake$

¹⁸ https://fundacionsolon.org/wp-content/uploads/2025/03/2025-02-24-tfff-version-2.pdf

¹⁹https://cop30.br/en/news-about-cop30/tropical-forests-forever-fund-boosts-international-support-and-positions-itself-a s-a-new-global-model-for-climate-finance

²⁰https://www.greenpeace.org/international/press-release/74545/tropical-forests-forever-facility-breakthrough-forest-pro tection-greenpeace-position-paper/

²¹ A more detailed summary of Greenpeace's views on the TFFF is available here:

While the TFFF reflects an important evolution in the forest finance debate, it also remains a voluntary initiative, hostage to a perverse international finance architecture that is incompatible with a sustainable future and limited environmental safeguards. On its own, it cannot meet the scale and urgency of the planetary crisis and much more is needed. The expected high-profile launch of the TFFF should be a catalyst for countries to agree meaningful formal outcomes at the COP. While being an initiative with potential to deliver much-needed finance to standing forests, the TFFF alone will not be able to respond to the lack of ambition in the formal negotiations. COP30 needs to deliver what science and justice demand: binding, negotiated and legally robust decisions under the UNFCCC.

A Substantial COP30 Negotiation Outcome for Forests

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'. Article 5 requires that Parties take actions to conserve and enhance forests. Additionally, the GST applies across all sectors, including the land sector, to track progress and identify priority areas.

However, the current governance of forests and related land-use matters under the UNFCCC is fragmented, with relevant actions scattered across disparate workstreams such as international cooperation measures organised by Article 6, the MWP (Mitigation Work Programme) and the GGA (Global Goal on Adaptation). This fragmentation leads to inefficiency, policy incoherence and a lack of a central, driving force for implementation.

To remedy this, COP30 should adopt a decision to establish a dedicated 5-year 'Action Plan for Implementation' to halt and reverse deforestation and forest degradation by 2030 (API4Forests)²⁴ as proposed by Greenpeace in the lead up to the Bonn SB62 meetings in June 2025. It places emphasis on securing outcomes across a range of forest-related negotiation tracks in the UNFCCC, with a mandate provided to the SBI (Subsidiary Body for Implementation), to support a streamlining and efficient approach for consolidating existing work concerning forests within the UNFCCC. The API4Forests seeks to build on the high-level political momentum and provides a clear pathway for the UNFCCC to embrace the pre 2030 urgency and, without creating new tracks of negotiations, establish a dedicated 5-year Action Plan for Implementation. This is proposed to be done by more streamlined negotiations and concrete areas of action:

- 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 IPs&LCs;
- 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;



https://www.greenpeace.org/international/story/78771/forests-brink-world-leaders-protect-cop30/

²² Preamble of the Paris Agreement: https://unfccc.int/sites/default/files/english_paris_agreement.pdf

²³ Article 5 of the Paris Agreement: https://unfccc.int/sites/default/files/english_paris_agreement.pdf

 $^{{}^{24}}https://www.greenpeace.org/static/planet4-international-stateless/2025/06/4a3f1b85-cop30-forest-action-plan-proposal.pdf$

- 5. Improving monitoring systems of deforestation and forest degradation through dialogue, reporting, and accountability; and
- 6. Enhancing International Cooperation and establishing a legacy of ongoing high-level political engagement to halt and reverse deforestation and forest degradation by 2030 and to align climate action in the land sector with the KM-GBF (Kunming-Montreal Global Biodiversity Framework).²⁵

This Action Plan would not create a new set of commitments or technical burdens but would instead enhance efficiency by integrating and informing existing mandates, aligning overlapping agendas and avoiding redundant efforts.

It would enable more effective use of limited time and resources, while ensuring that implementation efforts are mutually reinforcing, creating synergies across climate mitigation, adaptation and biodiversity goals. It would establish a formal, cyclical process under the UNFCCC to track progress, identify implementation gaps and match identified needs with financial, technological and capacity-building support. By creating a dedicated space to address the unique complexities of the land sector and the rights of IPs& LCs, the API4Forests would move the international community beyond ad-hoc pledges to a structured, accountable and legally grounded plan of action under the Paris Agreement.

Conclusion

However valuable, the TFFF launch and the voluntary Action Agenda commitments in Belém must complement, but not replace the need for significant ambition in the formal negotiations, where binding, accountable decisions must be made. The expectations of citizens across the globe to keep 1.5°C within sight cannot rest on Brazil's shoulders alone, and it is urgent for other governments to step forward. The convergence of international law, as clarified by the ICJ, and planetary science has created an unmistakable mandate for a paradigm shift. Protecting forests and stabilizing the climate is not a choice but a legal obligation, not a gradual challenge but an existential emergency defined by imminent, non-linear tipping points. The response must be commensurate in its scale, its speed and its legal force. COP30 cannot be another conference of pledges. It should be a conference of clear mandates and sectoral plans to boost implementation and synergy outcomes that respond adequately to the gaping ambition gap.

Recommendations

 Champion a COP30 Forest Action Plan: A formal COP30 decision on a mandated, 5-year 'Action Plan for Implementation' (API4Forests) will create the accountable, legally-grounded pathway required to meet the 2030 target to halt and reverse deforestation;

²⁵ A Program 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

- Mandate institutional synergies: A COP30 decision to enhance the mandate of the
 JLG of the Rio Conventions will build the essential institutional architecture to
 support the synchronized implementation of the Paris Agreement, the KM-GBF, and
 the UNCCD Land Degradation Targets, ensuring a holistic and effective response to
 the interconnected climate-biodiversity crisis;
- 3. **Ensure a high-integrity TFFF:** Governments should continue to engage constructively with the TFFF to ensure its credibility and environmental and social integrity;
- 4. **Invoke the rule of law:** Policy makers should consistently reference the 2025 ICJ-AO. They should frame ambitious action to halt deforestation and phase out fossil fuels not as a political preference but as a fundamental obligation under international law, thereby increasing the political cost of inaction;
- 5. **Ground NDCs in science and traditional knowledge:** All actors must insist that the NDCs due in 2025 be explicitly aligned with science and traditional knowledge, including on planetary boundaries and tipping points. This requires clear, time-bound and legally enforceable national targets for ending deforestation and forest degradation, alongside a rapid, just and equitable phase-out of all fossil fuels.

