

Copenhagen, May 6, 2024



The Danish 92 Group
Forum for Sustainable Development

To the Ministry of Foreign Affairs

Attn: Lene Veierskov, Maja Elisabeth Svankjær Thagaard

Cc: Lærke Marie Lund Petersen, Iben Barslund Villumsen

Response to the: (draft) Strategic Framework For the Tropical Forests Initiative for Climate and Sustainable Development (TFI) 2024 – 2027

From: The Expert Group on Nature-based Solutions (NbS) under the MFA Green Partnership.¹

Submitted online to: <https://um.dk/en/danida/about-danida/danida-transparency/public-consultations/meeting-on-7-may-2024>

The expert group on NbS (hereafter NbS-EG) welcomes the Ministry of Foreign Affairs' Tropical Forest Initiative (TFI), with an emphasis on indigenous peoples' and local communities and support to actions to halt and reverse deforestation and forest degradation. NbS -EG appreciates the opportunity to contribute to the design of the draft strategic framework for the TFI and hereby wishes to point out some important topics of concern, for consideration.

The NbS-EG support the TFIs aim and strategy to apply Nature-based Solutions in forest ecosystems to deliver on climate, sustainable development, and biodiversity. By using NbS as a framework and strategy, TFI has the potential to ensure that both social, rights-related, and natural fundamental dimensions are integrated into the holistic approach that is necessary. However, it is crucial that NbS adheres to guidance and principles to ensure high integrity and quality implementation.

The Expert Group on NbS firstly wishes to highlight a series of positive aspects related to the draft TFI Strategic Framework.

1. The importance of formulating a Danish strategy and an initiative for tropical forests is crucial and timely, as this issue is gaining urgency by the hour.
2. The NbS-EG welcomes the ambition TFI at impact level to deliver simultaneously on (1) climate mitigation and adaptation (2) sustainable development and poverty alleviation and (3) protection of biodiversity.
3. The emphasis on human rights-based approaches together with strengthening the rule of law in natural resource management, underline the potential for enhancing sustainable development of the forest and land use sectors through the TFI.

Secondly, the NbS-EG wishes to present five issues of concern and areas for improvement:

1. **Implementation and planning must ensure high integrity and quality NbS.**
2. **Involvement of and support to civil society organisations must be prioritised as a strong supplement to the current focus on bilateral relation.**
3. **The TFI and the Strategy framework must be coherent with other national and international strategies and legislation initiatives.**
4. **Lack of clear or incorrect definitions of central aspects.**
5. **Inclusions and involvement of Indigenous Peoples must be developed as it is crucial in the context of Tropical Forests.**

We will elaborate on these issues and present recommendations on the following pages.

¹ The Green Partnership is an initiative by the Ministry of Foreign Affairs to involve civil society in the green development agenda. The NbS Expert Group works on the track defined as Nature, ecosystems and nature-based solutions (NbS). The expert group is coordinated by the Danish 92 Group and is currently constituted of WWF, Forests of the World and IWGIA.

1. Implementation and planning must ensure high integrity and quality NbS.

1.1 The TFI needs a clearer definition and approach to Nature-based Solutions (NbS)

This is essential to ensure their strength, effectiveness, scalability, and sustainability, while preventing misuse and ensuring the well-being of both people and the planet.

The NbS expert group recognises the potential of high-integrity NbS in tropical forest ecosystems to effectively address climate change, reduce carbon emissions, enhance climate adaptation, protect biodiversity, and promote sustainable development. However, the strategic framework lacks a clear definition of NbS, including references to widely accepted understanding and technical guidance from organisations such as IUCN and UNEA. Without a clear definition and approach to NbS, there is a risk of misuse and misunderstanding, potentially resulting in applications that harm biodiversity and communities, undermining trust in the approach. In the "How-to Note on Climate Adaptation, Nature, and Environment," it is stated that the MFA will utilise the IUCN Global Standard for NbS. This standard serves as a tool to assist governments, communities, businesses, and NGOs in implementing high-integrity NbS that can deliver effectively on the three impacts of the TFI.

1.2 Working with forest and NbS requires long term commitments, not a short timeframe

The Tropical Forest initiative is intended to run from 2024-2027 with some projects running until 2028. Preventing deforestation and protecting forests cannot be limited to such a short amount, especially not if the MFA wants to create and support local communities and community forest management programmes. Nature-based solutions in forest areas (protection, restoration, sustainable management, and sustainable value chains) takes time, local presence, and interaction with the right local and national stakeholders. Community engagement over many years is crucial. As an example, WWF DKs partnership with the *Velux Group* on tropical forest spans over 20 years. Similarly, Forests of the World's experience in Honduras highlights that the timeframe needed (15 years) to establish viable cooperative businesses and sustainable value chains.

1.3 A geographical approach can strengthen the tropical forest initiative: Selecting the right geographic locations for biodiversity and forest conservation will allow for higher conservation value, MFA should take this into account when choosing target areas. Considering working on more Latin American countries should be explored as also suggested by the MFA.

1.4 Landscape-based approach is positive when done right:

A landscape-based approach that brings positive benefits in relation to landscape planning, conservation efforts and adaptation to climate change requires a stringent and conscious approach to local leadership, partnership, and forest governance. It is useful to adopt a thorough NbS approach, as outlined in the IUCN Standards, where design at scale is a criterion.

Recommendations:

- a. The TFI framework should include definition and description of the programmes' understanding and approach to Nature-based Solutions in line with the How-to-note on Climate Adaptation, Nature, and Environment
- b. Consider and plan for a long-term involvement.
- c. Use Standards for NbS initiatives that ensure a thorough and coherent design, including proper landscape approach, geographical considerations as well as local level involvement and political level engagement that support the initiatives.

2. Involvement of and support to civil society organisations must be prioritised as a strong supplement to the current focus on bilateral relations.

2.1 The Strategy in its current form represents a missed opportunity to create synergies and leverage on expertise from other MFA supported initiatives E.g. SPA partners and embassies. As the framework rightly emphasises: working across governments, civil society and the private sector can create long-term results in forest projects.

2.2 The TFI should prioritise the involvement and support of civil society organisations in the delivery mechanism as they play a crucial role in long-term and inclusive forest conservation. The engagement of CSOs is essential for enhancing local participation, strengthening advocacy efforts, promoting accountability, and empowering Indigenous Peoples and Local Communities ultimately contributing to the long-term conservation of tropical forest ecosystems. The TFI framework rightly concludes that political will and leadership provided at the country level are important for the success and failures of support to the forest sector and to address deforestation. However, political priorities and leadership fluctuates, as seen recently with Bolsonaro in the Amazon. In contrast, civil society organisations (CSOs), both international and national, dedicated to forest conservation, offer persistent and long-term commitment. Support to civil society is therefore critical as local CSOs can bridge between shifting political regimes, ensuring a continuous push from for sustainable forest management despite changing political landscapes.

The TFI recognises that "*supporting IPLCs, including acknowledging land tenure and governance rights for climate mitigation, will result in enhanced forest protection.*" In this context, IP & LC require counterparts and allies to bolster their capacity to interact with government authorities. However, the crucial role played by CSOs in fulfilling this function is not integrated into the delivery mechanism.

2.3 It is necessary to prioritise CSO engagement and re-direct involvement towards civil society and local communities throughout the TFI.

In projects where indigenous peoples and local communities play a significant role, civil society can and should play a significant role. This should include a focus on supporting local **leadership and ownership**, including youth involvement, which is crucial to the positive outcome of any initiative.

In relation to NbS, reviews of IUCN projects and lessons learned agree that a bottom-up approach is crucial for the successful impact of any initiative. It is useful here to share three essential points from studies of impact assessment in the IUCN:

1 - Local communities around the world, in cities and in rural areas, are on the frontlines of environmental challenges, providing inspiration as they undertake homegrown stewardship efforts to support sustainable local economies. Given the chance, local communities and resource user bodies can resolve environmental and livelihood challenges, in ways that make a positive difference locally, and may well provide inspiration globally.

2 - A two-way connection exists between the well-being and livelihoods of local communities, and the health of ecosystems. A healthy environment is crucial for communities. Conversely, strong and cohesive communities make conservation efforts more effective in maintaining healthy ecosystems.

3 - Successful stewardship initiatives require:

- Community empowerment and strong relationships, supporting both local involvement in environmental conservation activities (supporting local livelihoods and economies) and community engagement in larger-scale conservation;*
- Active and meaningful engagement of local communities and Indigenous rights-holders in environmental and natural resource decision-making and monitoring;*
- Adequate attention to ensuring sustainable livelihoods and local economies;*
- Supportive governments, in practice and policy, and recognition of community knowledge;*
- Reflecting the values of local people, and showing respect for Indigenous and local communities, and their traditional sustainable use and stewardship practices.*

2.4 NGOs have long term partnerships and relations to indigenous peoples' as well as traditional and local communities and their organisations and should be involved as long-term partners of indigenous peoples' organisations, with thorough knowledge of the context, well-established best practices based on lessons learned and important risks and opportunity assessments.

Recommendations:

- a. The TFI should seek opportunities to leverage and enhance Danish expertise in tropical forest conservation, encompassing ongoing MFA-supported initiatives like SPA and CISU partnerships, as well as environmental teams at embassies and Danish private companies investing in Nbs.
- b. The TFI should prioritize the involvement and support of civil society organizations, including INGOs and NGOs, in the delivery mechanism moving forward.
- c. Reconsider focus on necessary local leadership and ownership.
- d. Learn from impact assessments and consider the options for bottom-up engagement throughout the TFI.
- e. The MFA should develop some criteria for how to choose projects and in particular how to ensure that projects are implemented with local partners and communities as sub-partners to the projects.

3. The TFI and the Strategy framework must be coherent with other national and international strategies and legislation initiatives.

3.1 The TFI should align stronger with the Global Biodiversity Framework and the Paris Agreement to support achievement of biodiversity and climate benefits in the programme.

The NbS-EG observes a weak alignment with the GBF. It's essential to emphasize the significance of the GBF, alongside National Biodiversity Strategies and Action Plans (NBSAPs) as fundamental tools for government ownership and strategic planning. While the TFI's political ambition predominantly focuses on climate issues, there is an urgent need to support the national political ambition regarding biodiversity conservation as well. Therefore, it's recommended that the TFI includes references to the GBF within its strategic priorities (section 4.2) and political ambitions and commitments (section 6.2) and could support implementation of the NBSAPs.

Depending on the timeframe, indicators could also consider political progress, e.g. inclusion of forest-specific targets and outcomes in the NBSAPs, NDCs or other relevant national strategies and regulations and related actions required (cross-sectoral meetings held, participation in xx processes, etc).

3.2 The TFI and the strategy framework must recognise the role of global value chains and initiatives and legislation against deforestation and degradation.

To halt deforestation and forest degradation, we must acknowledge the role of trade and global value chains in driving deforestation and include the entire supply chain into our solutions. A focus on the entire value chain is key but takes time to consolidate in line with local commitments. Developing EU Deforestation Regulation (EUDR) compliance and novel technical solutions for local cooperatives, holds multiple opportunities for halting deforestation and strengthening local communities and other stakeholders. The TFI should therefore reference and support the implementation of the EUDR. With a stronger focus on the supply chains linked to the EU market for risk commodities and cooperation with producer countries, the TFI will also support specifically EUDRs Article 30. Furthermore, the EUDR includes opportunities for strategic partnerships with other European countries i.e. the Team Europe Initiative and with producer countries. Denmark is also a valued member of the Amsterdam Declaration Partnership and Denmark should use this platform to promote experience from the TFI and place this into a larger context. Alignment and capitalization also with the Forest & Climate Leaders' Partnership's (FCLP) strategic priorities is necessary and crucial for the effectiveness of the Strategy.

3.3 Forest initiatives should be aligned with other strategies to ensure coherence: i.e. Projects on the African continent must be aligned with the MFA's Africa Strategy. Efforts and partnerships in Africa ensure opportunities for trade and support the regulation that takes place in Europe.

The NbS-EG wishes to refer to the previously submitted [Consultation Note to the Danish Africa Plan](#) (*Samtænkning af Natur- og Samfundskriser: Nøglepunkter for Danmarks engagement på det afrikanske kontinent*) with further recommendations on the importance of coherence in Danish policy development and implementation.

Recommendations:

- a. The TFI should make clear references to the GBF and include support to NBSAPs and NDCs to ensure forest specific targets and outcomes and enable forest restoration and conservation.
- b. Ensure alignment with EU regulation and initiatives, such as the EUDR and CSDDD
- c. Align the TFI with the Team Europe Initiative on forests.
- d. Ensure alignment with the Africa Strategy and other trade initiatives.
- e. Global value chains must be included as a part of the strategic framework.

4. Lack of clear or incorrect definitions of central aspects

4.1 Clarifying definitions of forest restoration versus plantation forests.

There needs to be a clear understanding of what is meant with **forest restoration versus plantation forests**, especially when forest restoration includes plantation forest and what this means for the forests. Plantation forest can benefit local communities and create local jobs as long as the plantations are community based and not commercial projects but does not preserve or restore forests for example the partners in the Uganda projects are mostly focusing on plantation forests. Typically, plantation forest initiatives will not benefit the poorest in the local communities, they normally benefit more from having stronger biodiversity and more natural forests. Furthermore, a focus on preventing forest fires is missing.

In both the Uganda and the Ethiopia project there seems to be a strong focus on plantations, we estimate that around 36 million out of the total 95 million budget provided for Ethiopia is allocated to commercial plantation establishment. If the MFA wants to improve biodiversity and carbon storage while benefiting the rural poor populations, commercial plantations projects are at best ineffective and at worst counterproductive.

With the aim of improving biodiversity and carbon storage while benefiting the rural poor populations, commercial plantations projects are inappropriate or counterproductive and must be reconsidered.

It should be clarified that the objective and focus of projects under the TFI shall be restoration and conservation of natural forests. Establishment of plantations for timber and other wood products to take the pressure of the natural forests at a landscape level, may be one project intervention with the aim of natural forest restoration and conservation, but establishment of plantations should not account as a restoration effort in itself.

4.2 Avoiding the term IPLC, as encouraged by Indigenous Peoples' groups.

The term **IPLC** is encouraged by Indigenous Peoples' groups to not be used, instead it should be clear that Indigenous Peoples and local communities are two distinct terms.

An important debate in UN and indigenous peoples' fora suggests ending the use of the "IPLC", thereby using the term local communities next to the term indigenous peoples as it conflates the rights specific to IP. Here is reference to the three UN bodies speaking against using the term. The Permanent Forum on Indigenous Issues, an advisory body to the Economic and Social Council; the Special Rapporteur on the Rights of Indigenous Peoples, who promotes Indigenous rights and analyses rights violations; and the Expert Mechanism on the Rights of Indigenous Peoples, a subsidiary to the Human Rights Council that conducts studies to help state governments meet the goals of the Indigenous rights declaration stated that:

"We, the U.N. mechanisms of Indigenous peoples, urge all U.N. entities in their methods of work to refrain from conflating, associating, combining, or equating Indigenous peoples with non-Indigenous entities, such as minorities, vulnerable groups, or 'local communities,'" they wrote.

"We further request that all U.N. member-state parties to treaties related to the environment, biodiversity, and climate cease using the term 'local communities' alongside 'Indigenous peoples,' so that the term 'Indigenous peoples and local communities' is no longer used."

Recommendations:

- a. Clear understanding of scope and definitions are crucial: The Tropical Forest Initiative must be clear about what is meant with forest restoration, not foster plantation forests where natural forests are needed.
- b. This distinction needs to be understood on an overall level for the Tropical Forest Initiative and it must be clear on project level what is meant by the terms forest and forest restoration.
- c. Commercial plantations should not be supported: supporting commercial plantation projects will not provide additional benefit to the poor local communities nor any biodiversity value.
- d. If the MFA is to finance commercial plantation establishment, we highly recommend considering what is the purpose of this and whom will it benefit.
- e. Use the appropriate term for Indigenous Peoples alongside Local Communities. It should be clear that Indigenous Peoples and local communities are two distinct terms. We encourage the MFA to consider this in the final version and use this distinction going forward.
- f. Include focus on preventing forest fires.

5. Inclusions and involvement of Indigenous Peoples must be developed as it is crucial in the context of Tropical Forests.

Based on experience from previous initiatives, it is clear that working with indigenous peoples and their territories is the only effective governance mechanism to withstand deforestation and thus should be an essential part of the Tropical Forest Initiative.

In addition, any proposed strategy on tropical forests that may be situated on or impact on indigenous peoples' lands and territories must proceed in full recognition of their rights and with their free, prior and informed consent. Ambitions for biodiversity conservation and sustainable use should include and prioritise a clear target for increasing the extent of legal recognition of indigenous peoples' territories, and other community lands. The principles outlined in Section C of the *Kunming-Montreal Global Biodiversity Framework* (hereafter KMGBF) emphasises the need for tools and solutions for implementation and mainstreaming.

We wish to recall that point 7 of Section C of the KMGBF requests parties to:

7. The Kunming-Montreal Global Biodiversity Framework, including its Vision, Mission, Goals and Targets, is to be understood, acted upon, implemented, reported and evaluated, consistent with the contribution and rights of indigenous peoples and local communities.

In particular bullets 7a, 7c, 7g and 7h:

(a) The Framework acknowledges the important roles and contributions of indigenous peoples and local communities as custodians of biodiversity and as partners in its conservation, restoration and sustainable use. The Framework's implementation must ensure that the rights, knowledge, including traditional knowledge associated with biodiversity, innovations, worldviews, values and practices of indigenous peoples and local communities are respected, and documented and preserved with their free, prior and informed consent,[4] including through their full and effective participation in decision-making, in accordance with relevant national legislation, international instruments, including the United Nations Declaration on the Rights of Indigenous Peoples,[5] and human rights law. In this regard, nothing in this framework may be construed as diminishing or extinguishing the rights that indigenous peoples currently have or may acquire in the future;

Different value systems

(c) This is a framework for all - for the whole of government and the whole of society. Its success requires political will and recognition at the highest level of government and relies on action and cooperation by all levels of government and by all actors of society;

National circumstances, priorities and capabilities

(g) The implementation of the Framework should follow a human rights-based approach, respecting, protecting, promoting and fulfilling human rights. The Framework acknowledges the human right to a clean, healthy and sustainable environment;

(h) Successful implementation of the Framework will depend on ensuring gender equality and empowerment of women and girls, and on reducing inequalities.

Recommendations:

The MFA must reconsider and define a strategy for proper inclusion and involvement of indigenous peoples, as according to the KMGBF and other international agreements.