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Rainforest Foundation Norway's input to the public consultation on the Draft Strategic Framework for the Tropical Forests Initiative for Climate and Sustainable Development 2024 – 2027

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Rainforest Foundation Norway (RFN) would like to thank the Ministry of Foreign Affairs of Denmark for the opportunity to provide comments to the Draft Strategic Framework for the Tropical Forests Initiative for Climate and Sustainable Development 2024 – 2027. RFN is an NGO that for 35 years has worked to protect rainforests through supporting Indigenous and environmental organisations in tropical forest countries, advocating for rights-based forest management nationally and globally and engaging with private companies to remove deforestation from their supply chains.

We welcome and support the new Danish commitment to contribute 1 billion DKK in financial support to the global effort to halt tropical deforestation and forest degradation by 2030. We also welcome and appreciate the well-founded draft strategic framework, which presents a clear rationale and direction for the new Danish tropical forest initiative. We in particular support that a Human Rights Based Approach and Indigenous peoples and local communities are identified as cross-cutting priorities, that promoting sustainable development among Indigenous Peoples and local communities is part of the overall objective, and that civil society is identified as a key implementing partner.

Considering the abovementioned, we want to make the following recommendations to strengthen the draft strategic framework further:

- 1) The strategic framework should establish a clear connection to the established global efforts and mechanisms to halt tropical deforestation and forest degradation under the Paris Agreement.
- 2) The focus on civil society organisations as a key implementing partner should be matched with a dedicated funding envelope for civil society, which prioritize organisations that have a record of working with a rights-based approach and that work in close collaboration with Indigenous and local community organisations
- 3) Denmark should extend the duration of the tropical forest initiative and the strategic framework to 2030 at a minimum, and gradually increase the financial contribution to match the needs and Denmark's commitment to halt biodiversity loss



The strategic framework should establish a clear connection to the established global efforts and mechanisms to halt tropical deforestation and forest degradation under the Paris Agreement.

The UN Framework Convention on Climate Change (UNFCCC) has established REDD+ as a mechanism where tropical forest countries develop and implement national or sub-national strategies to reduce deforestation and forest degradation, and where developed countries provide financial support primarily through results-based payments¹. This is also anchored in Article 5 of the Paris Agreement.

The TFI should establish a clear connection to REDD+ as a key global framework in the overall strategic framework. Following this, the TFI should also state that Denmark will provide part of the dedicated funding as results-based payments achieved through REDD+. This will ensure that the TFI is aligned with, and supportive of, the nationally anchored REDD+ strategies to halt deforestation and forest degradation and coordinated with other donors' contributions to support these strategies. It will also contribute to giving tropical forest countries a clear financial incentive to initiate policy and governance reforms that are needed to improve governance and management of forests, and achieve inclusive sustainable development, as outlined in the Theory of Change of the Draft Strategic Framework.

We welcome that the TFI recommends using the established mechanisms for REDD+ funding in Brazil and the Congo Basin, the Amazon Fund and CAFI, as funding channels. Similar choices should be made in other countries where national REDD+ funds are established or under establishment, such as in Peru (Profonampe) and Indonesia (BPDH). This ensures coordination with other donors and that the actions are promoting and anchored in national strategies to end deforestation and promote sustainable management of tropical forests in those regions. The Amazon Fund has in particular proven to be an important funding mechanism supporting a range of important projects and interventions implemented by a variety of actors in Brazil, with an inclusive, effective and well-anchored governance structure. However, if the TFI establishes a clear link to REDD+ as a results-based mechanism at the strategic level and dedicates results-based funding towards this, it will also provide a clearer rationale for providing support to CAFI and the Amazon Fund, as these funding mechanisms are primarily established as vehicles of results-based payments from REDD+.

When providing results-based REDD+ payments, Denmark should make sure to use the best available standards for MRV and safeguards at national- or subnational-level. One such standard is the *The REDD+ Environmental Excellency Standard (TREES)* by *The Architecture for*

¹ In REDD+, tropical forest countries are promised financial support as an ex-post payment for reduced emissions from deforestation and/or forest degradation. The results are counted as one metric tonne of CO₂, and verified according to established rules and systems under the UNFCCC for monitoring, reporting and verifying the results. All REDD+ strategies and results are reported in the UNFCCC REDD+ web platform <https://redd.unfccc.int/>



*REDD+ Transactions (ART)*², currently used by the members of the LEAF Coalition³, which consists of the US, UK, Korea, Norway and several major global companies.

We also recommend that Denmark joins the IPLC Forest Tenure Pledge⁴ made at COP26 in Glasgow. The pledge committed \$1.7 billion to support the land tenure rights and rights-based forest management for and by Indigenous peoples and local communities. As the TFI has a strong focus on IP and LC rights and wellbeing as overall objective and cross-cutting principle, Denmark would be a good addition to the group of 21 donors currently committed to this pledge. Denmark's participation will also strengthen the coordination with the other donors who are most active in supporting IP and LC rights in climate and biodiversity. If Denmark is unable to join the IPLC Forest Tenure Pledge now, it should still join the conversations with other donors about extending the pledge beyond 2025.

The focus on civil society organisations as a key implementing partner should be matched with a dedicated funding envelope for civil society, which prioritize organisations that have a record of working with a rights-based approach and that work in close collaboration with Indigenous and local community organisations

The strong focus on civil society as a key actor and the importance of civil space in addressing deforestation and the challenges that causes it, and highlighting civil society organisations as a key implementing partner of the TFI, are key strengths of the TFI. Civil society organisations do a lot of critically important work by implementing projects on the ground and advocating for policy and governance reform needed to advance a sustainable, rights-based forest management.

CSOs are also a key actor in providing funding and other forms of support and collaboration with Indigenous peoples and local communities. A major obstacle for donor's who are working to provide more funding to support forest management led by IP and LCs is to provide direct funding, with the latest report by the Forest Tenure Funders Group⁵ showing that only 2,1% of their combined funding went directly to an IP or LC organisation. RFNs own research has showed that CSOs, and in particular CSOs based in tropical forest countries and/or CSOs that have strong and long-lasting connections with Indigenous and local community organisations, are a key channel to provide funding to IP and LCs⁶. Emphasising this part of the strategy by dedicating a substantial amount of the funding to CSOs will therefore help Denmark to

² <https://www.artredd.org/>

³ <https://www.leafcoalition.org/>

⁴ <https://webarchive.nationalarchives.gov.uk/ukgwa/20230106145205/https://ukcop26.org/cop26-iplc-forest-tenure-joint-donor-statement/>

⁵ <https://landportal.org/library/resources/indigenous-peoples-and-local-communities-forest-tenure-pledge>

⁶ <https://www.regnskog.no/en/news/less-than-a-fifth-of-iplc-intended-funding-reach-communities>



achieve other objectives of the TFI, such as having Indigenous Peoples and local communities as a cross-cutting priority.

Maintaining and strengthening the role of CSOs in the TFI will also ensure a good complementarity of the Danish support with the primary donors that support REDD+ and halting tropical deforestation. Currently, of the major donors US, Germany, UK and Norway, Norway and to some extent the US are the only donors providing substantial support to CSOs as part of their funding to address tropical deforestation.

Denmark should extend the duration of the tropical forest initiative and the strategic framework to 2030 at a minimum, and gradually increase the financial contribution to match the needs and Denmark's commitment to halt biodiversity loss

While ending deforestation is an urgent global concern and priority, achieving this will require long-term commitments from developed countries and donor countries alike. Denmark should therefore extend the time frame of the TFI and the financial commitment to 2030 at a minimum, to align with the global effort halt and reverse forest loss and land degradation by 2030, and preferably beyond this to 2035. This will send a clear signal to tropical forest country governments and to potential implementing partners that Denmark is a reliable partner committed to supporting this effort long term.

Along with extending the duration of the TFI, we also highly recommend that Denmark commit to gradually increasing the financial commitment from the current level of 1 bn DEK from 2024-2027. According to the *Forest Declaration Assessment*⁷ the global annual finance need to halt and reverse deforestation by 2030 is \$460 billion, while the annual commitment from international donors only amounts to \$4 billion annually from 2021-2025. Further, as part of the Kunming-Montreal Global Biodiversity Framework, developed countries have committed to provide a combined \$30 billion annually from 2025 to support the framework's objective to halt and reverse biodiversity loss by 2030.

RFN recommends that all developed countries, and others in the position to do so, mobilize at least 0,1 percent of Gross National Income as support to international biodiversity protection from 2025 and onwards to meet this commitment of \$30 billion under the Global Biodiversity Framework. In the case of Denmark, this means that Denmark should increase their support for biodiversity and nature to 475 million USD annually. In 2022, the share of Danish Official Development Aid (ODA) going to Environmental protection was \$64,62 million. This provides a clear rationale for increasing the financial commitment of the TFI beyond the current DKK 1 billion as part of a global resource mobilisation to halt and reverse biodiversity loss.

⁷ <https://forestdeclaration.org/resources/forest-declaration-assessment-2023/>