OBSERVATIONS IN RELATION TO CATEGORY ASSESSMENT
JURISDICTIONAL REDD+ - REMOVALS CREDITING
APRIL 2026

1. Purpose of these observations

The Governing Board (the Board) of the Integrity Council for the Voluntary Carbon Market (ICVCM), when considering the assessment of methodologies related to activities that Reduce Emissions from Deforestation and Forest Degradation in developing countries (REDD+[1]) identified that it would be beneficial to make available their observations for the purpose of supporting the future development of methodologies in this Category.

These observations are non-binding and do not impact or form any part of the Assessment Framework, Assessment Procedure, or any Decision (as defined under the Assessment Framework) and are published by the ICVCM for the purpose of information only.

The ICVCM may, from time to time, publish other observations for other Categories where it considers this may be useful for CCP-Eligible Programs and other stakeholders, and may update and revise its observations from time to time based on further assessment processes or information. Observations are not an exhaustive set of views of the Governing Board, and not all aspects addressed in assessment processes are included. No reliance may be placed on observations, as they are for the purpose of information only, and observations published are without prejudice to other ongoing assessments.

The Governing Board would like to express its gratitude to the experts and other stakeholders engaged in the assessment process who provided input to the ICVCM regarding this Category.

2. Observations relating to REDD+ methodologies

The Governing Board's observations regarding the assessment of REDD+ methodologies against the ICVCM Assessment Framework and its Core Carbon Principles generally relate to robust quantification and additionality and permanence.

The methodology within this Category to which these observations relate is the REDD+ Environmental Excellence Standard (TREES) V2.0 – Removals Crediting Level only (referred to as TREES Removals v2.0 in this document).

2.1. Category Details

Removals Crediting Level

Removals is a crediting level within the TREES methodology that applies to jurisdictions (e.g., countries, regional states, provinces) that wish to claim removals from the activities they carry

[1] The international community established the 'REDD+' framework to protect forests as part of the Paris Agreement. 'REDD' stands for 'Reducing emissions from deforestation and forest degradation in developing countries. The '+' stands for additional forest-related activities that protect the climate, namely sustainable management of forests and the conservation and enhancement of forest carbon stocks.

out. In essence, it can be viewed as jurisdictional reforestation and revegetation approach. Areas that were not previously forest within a timeframe of five years prior to the start of activities are not eligible to credit under this methodology; this ensures that Participants[2] do not convert other ecosystems to forests to claim removals credits.

In order to be eligible for removals crediting in any given year, Participants must also demonstrate that emissions from deforestation and forest degradation were reduced below the 5 year historical average (known as the TREES Crediting Level) in that year. This means removals can only be credited alongside another REDD+ emissions reduction approach[3] in the methodology.

2.2. Additionality and baselines under TREES Removals v2.0

Unlike typical carbon projects, which are typically small in physical scale and managed by private entities, jurisdictional approaches cover large geographic areas such as entire countries or states and are government-led. The Assessment Framework therefore provides special consideration to determining additionality in respect of Jurisdictional REDD+ (JREDD+) mitigation activities, given these unique characteristics[4].

TREES Removals v2.0 was assessed as a jurisdictional REDD+ methodology and, in line with Criterion 8.9 (b), ART seeks to take an alternative but equivalent approach to demonstrate compliance with the detailed provisions listed in Criterion 8.9 (a) Additionality for Jurisdictional REDD+ Programs[5]. Under TREES Removals v2.0, additionality is demonstrated through a two-step, performance-based approach:

Emissions from deforestation and forest degradation within the accounting area must be reduced below the TREES Crediting Level in the same year that removals credits are sought. In practice, this means that removals can only be credited where emission reductions are achieved concurrently within the same jurisdiction and reporting period; and the calculated removals must exceed the TREES Removals Crediting Level (a historical reference period of the five years immediately preceding the start of implementation). This comparison assesses post-implementation removals against a pre-implementation historical baseline.

The use of a historical average to define the baseline is intended to reflect the combined influence of laws, regulations, fiscal policies, commodity prices, and other factors that naturally vary over time, including natural forest regeneration, fires, and droughts. In contrast to project-level activities, these interrelated drivers are, in principle, within the policy and regulatory control of a jurisdiction. As such, the historical average represents the jurisdiction's typical pre-implementation performance. Where post-implementation GHG removals exceed this long-term historical average, the difference is attributable to the jurisdiction's mitigation actions and therefore considered additional. A similar approach for Jurisdictional REDD+ emission reduction approach, has previously received CCP-Approval for the non-HFLD crediting level of TREES v2.0 methodology[6].

[2] The term Participant means the Sovereign Developer of the ART jurisdictional REDD carbon credit program and is used for this purpose for the remainder of this document. Where the term jurisdiction is used, this refers to countries, regional states, provinces that are not involved in the ART carbon credit program.
[3] The two approaches are TREES Crediting Level (non-HFLD) and TREES HFLD Crediting Level
[4] Please refer to ICVCM Assessment Framework Section 8.9
[5] Please refer to ICVCM Assessment Framework Section 8.9 (a)
[6] Please refer to the TREES Decision and REDD+ Part I Board Observations

TREES Removals v2.0 requires that "Participants must demonstrate that all carbon estimation and quantification approaches conform with best practices for all matters''; It is to be noted that the methodology does not specify the carbon quantification approach or sampling method or methods to be used. Participants are required to provide the details of each method, including an explanation of why the method was selected for use. VVBs are required to assess whether quantification methodologies and associated measurements or monitoring are of acceptable accuracy and reliability, conservative and whether they have been appropriately applied. The techniques a VVB uses to audit a mitigation activity (e.g., cross checking, tracing, analytical testing, etc.) are case specific and, therefore, left to their professional judgment.

The ICVCM observes that cross-checking measured removal factors and stratification or sampling approaches against independent and credible sources is recognised as an effective auditing technique. Accordingly, the Governing Board determined that, for TREES Removals v2.0, VVBs must perform such cross-checks and make the results publicly available to enhance transparency and ensure compliance with the Assessment Framework requirements related to robust quantification. To address this remedial action, ART will need to resubmit TREES Removals v2.0 to the ICVCM for consideration and the revisions made will be reviewed in line with the Assessment Procedure[7].

During the assessment, ICVCM noted that natural regeneration and commercial forestry activities could present additionality risks if they are not clearly linked to the jurisdictional REDD+ crediting program. To address this risk, ART updated its mandatory Guidance[8] to clarify that such a link must be demonstrated. The updated Guidance requires evidence of prior intent for all forms of natural regeneration and the existence of a government plan or program, linked to the REDD+ framework, that incentivises commercial forestry activities. ICVCM considers that this clarification adequately addresses the identified risks and notes that the Guidance entered into immediate effect when it was published.

2.3. Observations on Program oversight

Finally, the Governing Board notes that the ART project cycle[9] refers to ART's close oversight of VVB processes and production of documentation. ICVCM notes that the line between oversight and influence is nuanced and overly close oversight may lead to a lack, or perceived lack, of independence of VVBs. ICVCM notes that observing the audit process is generally a beneficial process but recommends that where ART rectify auditing and mistakes in documentation, information on such rectification by ART should be made publicly available, for the benefit of other users of its standard.

2.4. Leakage

Leakage refers to GHG emissions that are caused by the implementation of a mitigation activity but occur outside its boundary. TREES HFLD v2.0 fully accounts for leakage when operating at the national level. At the sub-national level, TREES HFLD v2.0 applies a leakage deduction rate based on the percentage of total national area within the project boundary. Subnational accounting areas are only permitted as an interim measure until Dec 31, 2030, regardless of the number of years left in the crediting period[10].

[7] Please refer to the Assessment Procedure 3.20
[8] Guidance for Meeting the Requirements of TREES 2.0 for Removals Crediting, Feb 2025
[9] Please refer to Section 2.1 of ART TREES version 2.0
[10] https://www.art-redd.org/wp-content/uploads/2020/02/TREES-v1-Statement-of-Reasons-February-2020.pdf

The ICVCM notes that improved leakage estimates at a subnational level are important for scaling up the market and recommends that this issue is included in the ICVCM's CIWP on jurisdictional crediting approaches and its results considered in the context of evolutions to the Assessment Framework.

2.5. Permanence

TREES v2.0 does not require monitoring of reversals that may occur after the Participant has ceased to participate under TREES. Instead, the TREES methodology provides that if a Participant leaves, all the carbon credits they contributed to the buffer are cancelled (and not returned or otherwise used), an approach recognised in the Assessment Framework[11]. A consideration raised, including by some experts in the Expert Panel, was whether it is possible to know (in advance) whether the percentage placed in a buffer pool will be adequate and provide at least an equivalent level of protection as compared to the 40-year minimum requirement of monitoring and compensation for project-based methodologies[12].

This issue was previously examined during the assessment of the non-HFLD crediting level under the TREES v2.0 methodology[13], which concluded that, under plausible and practical scenarios, the accumulation of buffer credits would be sufficient to cover potential reversals. Further, should the buffer pool ever not be sufficient to cover a reversal, ART's rules and Terms of Use[14] require that the deficit must be replenished by the participant jurisdiction, including by purchasing other credits.

The ICVCM recognises that permanence remains a complex and evolving challenge across carbon markets, with scope for increased ambition over time. Following the conclusion of its first Continuous Improvement Work Program (CIWP) on permanence[15], ICVCM will consider whether future evolutions of the Assessment Framework should require carbon-crediting programs to: (i) commit to post-crediting monitoring for the permanence period required under the Assessment Framework, (ii) undertake periodic reassessments of buffer pool contributions to ensure these remain proportionate to the evolving risk profile of the project or jurisdiction and (iii) have provisions for increased transparency and reporting on buffer pool status.

2.6. Environmental and Social Safeguards

The Governing Board underlines the critical importance of robust environmental and social safeguards in REDD+ mitigation activities. Effective oversight mechanisms are essential to ensure that mitigation activities do not compromise ecological integrity or community well-being. The Assessment Framework requires environmental and social safeguards to be assessed by mitigation activity proponents[16]. Where risks of negative environmental and/or social impacts are identified, commensurate measures must be implemented to minimize and address these risks.

In the context of TREES Removals v2.0, ICVCM notes that certain reforestation activities may involve monocultures, which can pose risks to biodiversity. The magnitude of such risks depends on several factors, including the species planted (with native species generally presenting lower

[11] See Criterion 9.5 a) 2) and Criterion 9.5 a) 4 of the Assessment Framework
[12] See Criterion 9.3 a) 1) of the Assessment Framework
[13] Please refer to the TREES Decision and REDD+ Part I Board Observations
[14] https://www.artredd.org/wp-content/uploads/2024/05/ART-Registry-Terms-of-Use-May-2024.pdf
[15] https://icvcm.org/continuous-improvement-work-programs/standardised-approaches#permanencereport
[16] Please refer to Section 7 of the Assessment Framework.

biodiversity risks), the spatial extent of the monoculture (larger, contiguous areas increasing potential impacts), and the number and distribution of planted areas. While small and diverse monoculture plots may not present significant risks at the ecosystem or landscape scale, multiple similarly planted plots could, in aggregate, have adverse biodiversity impacts.

The ICVCM observes that both TREES v2.0 and the ICVCM Assessment Framework include specific safeguard provisions related to biodiversity that are intended to mitigate these risks. In particular, TREES v2.0 safeguards are aligned with the Cancún Safeguards established under the UNFCCC REDD+ Framework, which provide an overarching structure to ensure that REDD+ activities avoid harm and deliver environmental and social co-benefits.