



To the Climate Change Secretariat
PO Box 260124, Bonn
email: secretariat@unfccc.int

Asunción, 28 March 2011

Dear Madam, Sir,

Referring to your call for Submissions from Parties and accredited observer organizations on matters relating to the Implications of the inclusion of reforestation of lands with forest in exhaustion as afforestation and reforestation clean development mechanism project activities (SBSTA), I would hereby like to submit the views of the Global Forest Coalition, a worldwide coalition of over 50 NGOs and Indigenous Peoples' Organizations striving for rights-based, socially just forest conservation.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Simone Lovera-Bilderbeek".

Simone Lovera-Bilderbeek
Executive director and UNFCCC focal point
Global Forest Coalition



**Submission by the Global Forest Coalition on the
Implications of the inclusion of reforestation of lands with forest in
exhaustion as afforestation and reforestation clean development
mechanism project activities**

In response to the call for views on the implications of the inclusion of reforestation of lands with forest in exhaustion as afforestation and reforestation clean development mechanism project activities I hereby submit a joint declaration supported by 64 national and international NGOs and Indigenous Peoples' Organizations calling for the exclusion of monoculture tree plantations from financial support to forest and climate change-related programs.

The Global Forest Coalition shares the concerns expressed by the World Rainforest Movement (see annex 1), Timberwatch Coalition and others about the negative social and environmental impacts of monoculture tree plantations and the risk that, in the absence of a proper definition of "forests", the inclusion of "lands with forest in exhaustion as afforestation and reforestation" activities under the CDM will provide a significant financial incentive for the establishment of such plantations.

In this respect, the joint declaration calls upon all actors involved in the negotiations under the Framework Convention on Climate Change, to explicitly exclude financial support to monoculture tree plantations from any mechanisms, funds, investment programs, financial facilities or other funding flows that may be established to address deforestation and forest degradation, and conserve and restore forests as measures to mitigate climate change.

We also support the call for an urgent revision of the definition of "forests" that is used under the Framework Convention on Climate Change and the Kyoto Protocol, so that a clear distinction can be made between environmentally and socially beneficial forest restoration activities and environmentally and socially harmful large-scale monoculture tree plantations establishment

Exclude Monoculture Tree Plantations from Financial Support to Forest and Climate Change-related Programs

The undersigned organizations call upon Governments, international financial institutions, and other multi-lateral and bi-lateral agencies to explicitly exclude all support to monoculture tree plantations from financial mechanisms established to promote forest conservation, including financial mechanisms to reduce deforestation and forest degradation and to restore forests as a climate change mitigation measure.

We also call upon these agencies to specifically exclude support for the planting of genetically engineered trees, as well as potentially invasive exotic trees, from these funding mechanisms.

Large-scale monoculture tree plantations have proven to cause a broad range of negative environmental and social impacts¹:

- They have been and continue to be a major direct cause of the destruction of native forests in countries as varied as Australia, Brazil, Indonesia, and Chile.
- They also are a major cause of the destruction of or damage to ecosystems such as grasslands (including pampas and savannahs), and wetlands, and thus a major cause of biodiversity loss.
- Due to the massive use of agrochemicals in these plantations, they are a major cause of the contamination and deterioration of soils and watersheds. This also has serious negative impacts on human health in rural communities.²
- Many plantations have a severe negative impact on water tables, leading to water stress in neighboring communities and ecosystems.
- Many plantation companies have violated the land rights of Indigenous Peoples. In several cases, this has lead to violent conflicts and even murder.³
- The employment conditions of contract workers by many tree plantation companies are notoriously bad⁴.
- By replacing small-scale mixed agriculture, large-scale monoculture tree plantations undermine food sovereignty, food security and land reform processes, and thus contribute to increased food prices, hunger and malnutrition.
- Monoculture tree plantations provide very little employment per hectare of land. In Brazil it has been calculated that Eucalypt plantations provide up to 245 times less employment per hectare of land than small-scale agriculture, scoring even lower than soy cultivations⁵. For that reason, these plantations are a major cause of rural unemployment and depopulation, causing migration of rural populations to cities and to the agricultural frontier, thus contributing to further deforestation.

Indigenous Peoples, women and children are most affected by many of these impacts.

From a climate change mitigation perspective, many of these impacts imply that the expansion of tree plantations will increase rather than reduce greenhouse gas emissions, especially if their

impacts on forests and other ecosystems and the negative impacts of the pulp and biomass industry are taken into account. It is estimated that plantations store, on average, 20% of the carbon stored in old growth forests.⁶

By providing very little employment per hectare of land and thus increasing the pressure upon remaining available land, monoculture tree plantations are increasing the pressure upon natural forests rather than reducing it. We denounce the actions of the same organizations that are falsely defending the expansion of tree plantations as a measure to reduce the pressure on natural forests while promoting an increase in demand for wood products, agrofuels and bio-energy produced from cellulose⁷. Only effective demand-side measures that lead to a sharp reduction in the demand for timber, pulp and other forest products will decrease pressure upon forest ecosystems by the forestry industry.

In submissions to the FCCC, a broad range of Indigenous Peoples' Organizations, NGOs, women's networks, youth movements, peasant movements⁸ and other rightsholders and stakeholders have expressed similar concerns about tree plantations and demanded the exclusion of such plantations from, especially, policies to reduce emissions from deforestation and forest degradation in developing countries.

We thus call upon all the above-mentioned agencies, and other actors involved in the negotiations under the Framework Convention on Climate Change, to explicitly exclude financial support to monoculture tree plantations from any mechanisms, funds, investment programs, financial facilities or other funding flows that may be established to address deforestation and forest degradation, and conserve and restore forests as measures to mitigate climate change.

1 See for a comprehensive documentation of these impacts <http://www.wrm.org.uy>. See also <http://www.globalforestcoalition.org/img/userpics/File/LifeAsCommerce/LIFEASCOMMERCE-CERTIFICATION.pdf>
<http://www.foei.org/en/publications/pdfs/cellulose-industry/view>
<http://www.globalforestcoalition.org/img/userpics/File/publications/EmptyLand.pdf>
<http://www.mst.org.br/mst/pagina.php?cd=6008>
<http://www.censat.org/ambientalistas/66/NoticiasCensat1.html>
[http://www.deudaecologica.org/publicaciones/Chapter4\(81-124\).pdf](http://www.deudaecologica.org/publicaciones/Chapter4(81-124).pdf)
<http://www.amigos.org.ar/bosques.html>

2 See for example: <http://www.wrm.org.uy/subjects/women/pesticide.html>

3 See for example <http://www.wrm.org.uy/bulletin/131/Indonesia.html>

4 See for example: <http://www.wrm.org.uy/countries/Brazil/fase.html>

5 http://www.natbrasil.org.br/Docs/biocombustiveis/biocomb_ing.pdf

6 <http://www.asb.cgiar.org/pdfwebdocs/Climate%20Change%20WG%20reports>

7 See for example: <http://www.fao.org/forestry/media/16639/1/>

8 See amongst others:

<http://itsgettinghotinhere.org/2008/12/14/statement-form-the-climate-justice-now-alliance-on-the-poznan-climate-talks/>, http://www.viacampesina.org/main_en/index.php?option=com_content&task=view&id=656&Itemid=1, http://cdm.unfccc.int/public_inputs/EB31_ARWG_Land_eligibility/cfi/J9KDMW9XZQQPSA829SLXL00T4BXYCI, http://www.gendercc.net/fileadmin/inhalte/Dokumente/UNFCCC_conferences/COP14/Gendercc_submission_REDDE.pdf, <http://www.ecosystemsclimate.org/WatchRead/tabid/1602/mod/6294/articleType/ArticleView/articleId/273/Summary-ECA-position-paper-Bonn-March-2009.aspx>, <http://towardfreedom.com/home/content/view/1480/1/>, http://www.tebtbeba.org/index.php?option=com_docman&task=doc_download&gid=72&Itemid=27, <http://www.redd-monitor.org/2009/04/16/rainforest-foundation-uk-and-greenpeace-comment-on-forest-investment-program-draft/>

Signed:

Sobrevivencia/Amigos de la Tierra- Paraguay
World Rainforest Movement
Global Forest Coalition
Latin American Network Against Monoculture Tree Plantations

Greenpeace International
Friends of the Earth International
International Alliance of Indigenous and Tribal Peoples of the Tropical Forests
Jeunes Volontaires Pour l'Environnement, Togo
Genenet - focal point Gender, Environment, Sustainability
ProNatura/ Friends of the Earth- Switzerland
CENSAT/Amigos de la Tierra, Colombia
Frente por la Vida y contra el Desierto Verde, Colombia
Friends of the Earth-Finland
Rettet den Regenwald, Alemania
Asociación ANDES, Perú
WALHI/Friends of the Earth-Indonesia
Genderfocus, Sweden
Ecological Society of the Philippines
Miljöförbundet Jordens Vänner/Friends of the Earth-Sweden
Global Exchange
CarbonTrade Watch
Transnational Institute
Pacific Indigenous Peoples Environment Coalition
NOAH/ Friends of the Earth-Denmark
Biofuelwatch
Society for Wetland Biodiversity Conservation, Nepal
North East Peoples Alliance on Trade, Finance and Development, India
Elephant Conservation Network, Thailand
Friends of the Earth England, Wales and Northern Ireland
Society for Threatened Peoples International
Earth Peoples
Maudesco/Friends of the Earth- Mauritius
Friends of the Earth-Norway
African Centre for Biosafety
South Durban Community Environmental Alliance, South Africa
Arbeitsgemeinschaft Regenwald und Artenschutz, Germany
O Le Siosiomaga Society, Samoa
Aliansi untuk kemanusiaan dan lingkungan, Indonesia
PENAGMANNAKI, Philippines
The Timberwatch Coalition
Justica Ambiental, Mozambique
Suni-ridge Environmental Centre, South Africa
Friends of the Siberian Forests, Russia
GenderCC
ICTI, Indonesia
ILSA, Colombia
Friends of the Earth-Australia
CAPPA, Indonesia
Robin Wood, Germany
Otros Mundos/ Amigos de la Tierra- Mexico
Asociacion Indigena Ambiental de Panama
Fundacion para la Promocion del Conocimiento Indigena, Panama
Regenwald Institut, Germany
ProRegenwald, Germany
Netzwerk Afrika Deutschland, Germany
Amigos de la Tierra España
Amigos de la Tierra Argentina
Friends of the Earth-Melbourne

Mangrove Action Project
Kobra-Germany
Madre Tierra/Amigos de la Tierra- Honduras
Global Justice Ecology Project, USA
Equations, India
Amigransa, Venezuela