

The international civil society network Climate Land Ambition Rights Alliance (CLARA) thanks the Co-facilitators for the opportunity to provide input into the next Forum of the UNFCCC's Standing Committee on Finance, on the subject of Financing for Nature Based Solutions (NBS). This Submission is made on behalf of the members of CLARA, listed at www.climatelandambitionrightsalliance.org/members. CLARA and its members appreciate and take note of the 'Co-facilitators Note' that focuses on the use of nature-based and ecosystem-based solutions for climate change adaptation and mitigation.

For context, submissions by CLARA members comprised more than 25% of the total civil society submissions into the 'Nature Based Solutions' workstream of the 2019 UN Global Climate Action Summit. Our submissions can be viewed at <https://www.climatelandambitionrightsalliance.org/impact>. CLARA member submissions put local and indigenous knowledge systems at the core of climate actions for mitigation and adaptation, and so we agree with the Co-facilitator's note that such systems are also 'integral' to NBS.

We further appreciate that the Opening Ceremony for the Forum proposes an examination of "what the NBS is [*sic*] and why it is important." CLARA and its members suggest that this question could itself become the basis for the Forum. Simply put, there is no consensus regarding the scope of proposed 'nature based solutions'.

CLARA notes and appreciates the various efforts from civil society and academia to define NBS and to develop appropriate standards for NBS.¹ A few general principles can be gleaned from these efforts, and therefore we suggest that the Forum should start with a focus on the specific requirements for NBS as they pertain to climate ambition and achieving 2030 Goals. Among the key findings from these efforts:

- ✓ Nature based solutions are not a substitute for rapid phase-out of fossil fuels.
- ✓ Nature based solutions combine biodiversity and climate mitigation/adaptation outcomes.
- ✓ Nature based solutions require the full engagement and consent of indigenous peoples and local communities and a gender responsible approach following the Gender Action Plan (Decision 3/CP.25).
- ✓ Nature based solutions must help prevent ongoing loss and damage to natural ecosystems, particularly primary, carbon dense ecosystems, and encourage agroecological practices.
- ✓ No shifting or 'netting out' responsibility for emissions using Nature Based Solutions.

Civil society and academia are not the only entities seeking to define and deploy Nature Based Solutions. The fossil fuel company Shell defines nature based solutions as "projects which protect, transform or restore land."² In 2019 the oil and gas company Total also launched an NBS initiative, "Total Nature Based Solutions", that intends to fund, develop and manage projects "in carbon sequestration and

¹ See "We Stand Together With Nature", <https://medium.com/@naturebasedsolutions32/and-also-not-either-or-the-need-to-restore-nature-and-cut-emissions-9ef7cfda17e6>; "Nature-based Solutions to Climate Change—Key Messages for Decision Makers", University of Oxford, <https://nbsguidelines.info/>; and the recently-launched NBS Global Standard, <https://www.iucn.org/theme/nature-based-solutions/iucn-global-standard-nbs>.

² See <https://www.shell.com/energy-and-innovation/new-energies/nature-based-solutions>

greenhouse gas emissions reduction,” projects that could apparently extend to proposed geoengineering solutions like BECCS or DAC. None of the core principles we list above as critical to NBS are included in Total’s announcement.³ Finally, the Oil and Gas Climate Initiative, with twelve member companies from the oil and gas industry, sees a role for Nature Based Solutions as an adjunct to the OGCI’s “aspiration to kickstart a commercial carbon capture, usage and storage (CCUS) industry.”⁴

We draw attention to these very different definitional approaches to ‘Nature Based Solutions’ to indicate to the Co-facilitators that it would be a grave mistake to assume existing consensus on the scope of Nature Based Solutions that should as such be available for financing. We strongly agree with the statement from IUCN, at the launch of its NBS Global Standard, that “weak or mis-labeled Nature-based Solutions projects can water down the case for the Nature-based Solutions approach – de-incentivising its use, eroding donor confidence and misdirecting efforts.” CLARA joins others in drawing attention to the *a priori* need for ‘conceptual and operational clarity’ pertaining to NBS.

The Co-facilitators’ note does an excellent job of laying out a set of possible sub-themes for the Forum, with a focus on indigenous knowledge, biodiversity protection, land restoration, and the use of NBS in the service of ambitious ‘nationally determined contributions’ (NDCs) and National Adaptation Plans. We request that the Co-facilitators go even further in developing these sub-themes, and to do so in such a way that makes clear what types of land-use projects fall outside the definition of a ‘nature-based solution’.

For CLARA, the ‘red-lines’ associated with NBS are relatively clear and simple:

- ✓ NBS approaches *must* reinforce the importance of ecological integrity and conservation of biological diversity. Approaches that are based solely on carbon sequestration, without consideration of other ecosystem values, cannot be deemed ‘nature based solutions’. A high-integrity approach to NBS would reflect the conclusion in both the Convention on Biological Diversity, and the UNFCCC, that climate and biodiversity challenges must be addressed in an integrative fashion. (The CBD has already defined this as ‘Ecosystem-based Approaches.’) The Forum could help clarify pathways for implementing Para 14 of COP decision 1.CP/25.
- ✓ The requirement of ecological integrity indicates that reforestation using exotic- or single-species planting approaches cannot be considered a ‘nature based solution’. We are deeply concerned about the potential for the violation of land rights of indigenous peoples, local communities, and women that can result when such projects are proposed.⁵
- ✓ Most concerning of all however is the risk that ‘NBS’ is used as cover to continue ‘business as usual’, based on the completely mistaken belief that ‘nature based solutions’ can somehow offset the climate damage associated with fossil fuel use. CLARA takes the position that land-based credits should never, under any circumstances, be used to offset continued fossil fuel use.
- ✓ NBS must not include geoengineering technologies, including BECCS, large-scale biochar, Enhanced Weathering and other technologies that fall within the CBD’s working definition of geoengineering (CBD decision X/33).

³ See <https://www.total.com/commitment/climate-change/carbon-neutrality>

⁴ See <https://www.bp.com/en/global/corporate/news-and-insights/press-releases/oil-and-gas-climate-initiative-announces-progress-towards-methane-target-and-new-ccus-initiative.html>

⁵ See for example “Large-scale forest plantations for climate change mitigation? New frontiers of deforestation and land grabbing in Cambodia”, https://www.eur.nl/sites/corporate/files/11-ICAS_CP_Scheidel_and_Work.pdf, in which the authors note that the “justification of large-scale forestry plantations for climate change mitigation may be merely rhetorical”.

Expanding carbon sinks for land, and enhancing agricultural resilience by rebuilding soil carbon levels, are urgent and necessary tasks in their own right. Deep reductions in non-CO₂ emissions from changes in agricultural practices, and transforming forests from their current global status as a 'net source' of emissions to a 'net sink' for CO₂ requires an end to forest destruction or conversion. These actions should not be viewed as part of the 'solution' to inadequate ambition in another economic sector. Using credits or financial transfers to 'offset' continued GHG emissions *de facto* lowers the level of ambition associated with an NBS action and should not be countenanced. CLARA has maintained this position since well before the term 'NBS' came into common use; indeed, it informs our approach to the ongoing UNFCCC negotiations pertaining to Paris Agreement Article 6.

Outputs from the Forum should help the Standing Committee on Finance provide appropriate guidance to the financial mechanisms of the convention, in order to maximize adaptation and mitigation impact. Using 'NBS' outputs in ways (credits, offsets) that allow for continued fossil fuel use risks negating any mitigation impact. CLARA therefore requests the Co-facilitators to clarify whether and to what extent this Forum considers *the use of land-based credits to offset emissions in other sectors* as within the scope of 'NBS'.

CLARA's position is grounded both in science, and in Paris Agreement Article 2. In terms of science, the IPCC has already made clear the risk of reversals/non-permanence in AFOLU mitigation,⁶ while the AR6 Special Report on the 1.5 Degree Goal Summary for Policy Makers, at C.2.3, lists a range of 'technically proven options' to limit warming that do not include offsetting.⁷ CLARA notes that Paris Agreement Article 2.1(c) requires that finance be "consistent with a pathway towards low greenhouse gas emissions and climate-resilient development." The use of nature-based offsets to allow for continued fossil fuel use is inconsistent with this agreed goal.

Another possible way that the Forum could sharpen its guidance to the financial mechanisms of the convention would be to focus on developing a hierarchy of 'NBS' uses, arranged according to the provision of *co-benefits* associated with Nature Based Solutions. Prioritization should again be based on mitigation and adaptation impact.

Developing such a hierarchy would allow for better articulation of the gains associated with: improving land tenure and indigenous rights to land; managing for ecosystem integrity and resilience; recovering the carbon carrying capacity of natural forests; and shifts away from high-carbon (usually livestock-dominated) agricultural pathways. Further, development of a hierarchy could help clarify operational linkages to NDCs, NAPS, and medium-term national development plans, consistent with Paris Agreement Article 2.

CLARA members again thank the Co-Facilitators for the opportunity to comment on the content and conduct of the proposed SCF Forum on Finance for Nature Based Solutions. We look forward to our members participating in the Forum and providing inputs consistent with the approaches we articulated last year during the UN Climate Action Summit.

Respectfully submitted,

⁶ See https://www.ipcc.ch/site/assets/uploads/2018/02/ipcc_wg3_ar5_chapter11.pdf, at 11.3.2.

⁷ <https://www.ipcc.ch/report/sr15/summary-for-policymakers/>