

## UN Open Working Group on the Sustainable Development Goals 8 (OWG8)

### **Forests and Biodiversity** Joint position paper by members of the CBD Alliance<sup>1</sup> and the Global Forest Coalition<sup>2</sup>



*Atlantic forest, Brazil. Photo: S. Lovera*

Biodiversity, which includes ecosystems like forests and oceans, is vital for sustainable development. Despite the legally binding commitments to reduce biodiversity loss reflected in the Convention on Biodiversity and its Aichi targets, forests and other ecosystems continue to be lost at a devastating rate. It is widely acknowledged by scientists and policy-makers that this loss has to stop as soon as possible if sustainable development is to be achieved. Ambitious goals and targets as well as transformative policies are needed in this respect.

Forests and biodiversity, and policies to protect both must be discussed together, not separated into two different topics as has been done by issuing two separate Issue Briefs. Discussing forest policy as separate from wider policies aimed at conserving biodiversity risks favouring reductionist policies, which reduce forests to mere tree cover or carbon stocks (or even intended tree cover) – regardless of whether the trees are part of a diverse living ecosystem, a monoculture tree plantation, or even a clearcut forest which is to be converted to a tree plantation. Such a reductionist view forms the basis of the Food and Agriculture Organisation' and UNFCCC's definitions of 'forests'<sup>3</sup> and, as we argue below, has become a driver of forest and biodiversity

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<sup>2</sup> The Global Forest Coalition is a worldwide coalition of 56 NGOs and IPOs from 40 different countries promoting rights-based, socially just forest policy. For more information please contact [simone.lovera@globalforestcoalition.org](mailto:simone.lovera@globalforestcoalition.org)

<sup>3</sup> Note that UNFCCC, including for the purpose of the Clean Development Mechanism, uses an even wider definition of forests than FAO, one that includes oil palm, jatropha and other tree and shrub plantations used for 'agricultural purposes'.

destruction in many parts of the world. Therefore, we urge the need for a change in the definition of forests.

Both of the TST Issue Briefs on Biodiversity and on Forests rightly highlight the crucial role of biodiversity in general and forest ecosystems in particular for the livelihoods of communities, especially rural communities, forest-dependent peoples and fishing communities. They describe the vital and manifold roles of biodiversity, including forests, as planetary life-support systems and as crucial for human lives and well-being. Both Issue Briefs also correctly highlight the importance of addressing the drivers behind biodiversity and behind forest loss.

However, far from proposing credible ways of addressing those drivers of biodiversity and forest destruction – or even adequately identifying them – the Issue Briefs put forward policy proposals which are dangerously flawed: A focus on creating new market-based mechanisms, including through REDD+, on creating new financial values and accounting systems for biodiversity, including forests, and on leveraging more finance for ‘Sustainable Forest Management’, as well as implicit support for more industrial tree plantations, while disregarding traditional forest & biodiversity management practices that have thrown better results with less financial investment.

*The myths that forest destruction is mainly confined to the tropics and that it is declining*

Two dangerous errors are contained in a key assumption contained in the Issue Brief on Forests: “In the last few years, deforestation - mainly the conversion of tropical forests to agricultural land – has shown a decreasing trend.” On the one hand, there is no evidence of any recent decrease in tropical deforestation, unless all tree plantations and all clearcuts on which such plantations are to be established are classed as ‘forests’. For example, a recent study based on satellite images of global “forest cover” changes between 2000 and 2012<sup>4</sup> found that tropical forest loss increased by 2,101 km<sup>2</sup> per year during this period and that increased deforestation in Indonesia, Malaysia, Paraguay, Bolivia, Zambia, Angola and other countries more than offset reductions in forest loss in Brazil. Even those figures are over-optimistic because satellite image resolutions did not allow researchers to distinguish between tree plantations and forests – though clearcut areas were excluded. And although the rate of deforestation in the Brazilian Amazon decreased after a high in 2003/04 and then consistently between 2009 and 2011/2011, it rose again in 2012/13, confirming warnings that Brazil’s new Forest Code would trigger a marked rise in deforestation. The same study identifies significant losses of temperate and boreal forests, especially in Canada and eastern Russia and showed that industrial logging in the south-eastern US led to a ‘disturbance’ (i.e. logging) rate four times as high as that of South American rainforests during this period.

A previous study by the same lead author and based on a similar methodology, showed that between 2000 and 2005, Canada and the US each had a higher rate of forest loss in proportion to their forest cover than Brazil, that 30% of total global forest loss occurred in North America, and that the US had lost a higher percentage of its forests than Brazil, Indonesia, China or DR Congo. Although beetle infestations and fires were responsible for large forest losses in Alaska and western US, losses in

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<sup>4</sup> High-resolution global maps 21st-century forest cover change, M.C. Hansen et al, *Science*, Nov. 15, 2013, Vol 342 #6160

the southeast, the Midwest and along the western coast were ascribed to industrial logging<sup>5</sup>.

Forest destruction is thus clearly not confined to the tropics, nor to low-income countries, one of many reasons why the emphasis in the Issue Briefs on mobilising large financial resources being key to protecting forests is misguided.

*The Issue Brief on Forests implicitly supports industrial tree plantations*

As highlighted above, separating discussions about biodiversity from those about forests favours the FAO's and UNFCCC's flawed definitions of forests, which include industrial tree and shrub plantations, and that could even include as "forests" the use of genetically modified trees in those plantations. This is reflected for example in the Issue Brief's claim that "*Afforestation and natural expansion of forests...have reduced the net loss of forest*". "Afforestation" means tree planting in areas which have not naturally supported forests, such as tropical and subtropical grasslands, and it almost invariably refers to industrial tree plantations. The concept of 'net forest loss' is based on the assumption that the destruction of **biodiverse** forest ecosystems can be offset by new industrial plantations of alien species –even if these plantations are of genetically modified trees - such as eucalyptus or possibly even oil palm monocultures – as well as allowing clearcuts to be ignored (provided there is an intention to subsequently plant trees on the same land). It is incompatible with aims to conserve biodiversity.

Following on from this flawed definition, the Issue Brief ignores the major role of industrial tree plantations in forest destruction. For example in Indonesia, eucalyptus and acacia monocultures for pulp and paper production have been one of the main causes of rainforest clearance – and the main cause of the destruction of most of Sumatra's forests<sup>6</sup>. And in the south-eastern US, home to some of the world's most biodiverse temperate forests, an estimated 5-6 million acres of forest ecosystems are being clearcut every year, mostly to make way for industrial tree plantations for pulp and paper and more recently wood pellet and woodchip production for bioenergy<sup>7</sup>. According to the US government's Southern Forests Futures Project, native pine forests in the region decreased from around 72 to just over 30 million hectares between 1950 and 2010 while pine plantations increased from just above zero to 39 million hectares during the same period<sup>8</sup>.

As well as causing forest destruction, industrial tree plantations are commonly associated with large-scale land-grabbing, destruction of livelihoods and food production and the displacement of communities, as well as with freshwater depletion and pollution, soil degradation and high levels of toxic agro-chemical use, and it destroys biodiversity in many different ecosystems, including grasslands. Indigenous Peoples, other forest-dependent peoples, small farmers and pastoralists are particularly affected by industrial tree plantations. Women are often affected most severely.

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<sup>5</sup> Quantification of global gross forest cover loss, M.C. Hansen et al, PNAS, May 2011 vol. 107, no. 19

<sup>6</sup> <http://rainforests.mongabay.com/0807a.htm>

<sup>7</sup> See for example <http://www.dogwoodalliance.org/wp-content/uploads/2012/08/SustainingOurDefense.pdf>

<sup>8</sup> Southern Forests Futures Project, Summary Report, USDA Forest Service Southern Research Station, October 2012, [http://www.srs.fs.fed.us/pubs/gtr/gtr\\_srs168.pdf](http://www.srs.fs.fed.us/pubs/gtr/gtr_srs168.pdf)

*Key drivers and all underlying causes of biodiversity, including forest destruction are ignored*

Both Issue Briefs highlight the need to address the underlying causes of biodiversity and forest destruction respectively, but both fail to adequately identify or address them. The biggest driver of biodiversity loss, including forest destruction is the current unsustainable use of natural resources. Therefore, fundamental changes in international resource use policies are urgently needed, which have at the same time the potential to tackle the emerging biodiversity challenges.

The Issue Brief on biodiversity acknowledges that the 2010 Biodiversity Target was missed partly because the underlying drivers of biodiversity were not addressed and it emphasises the need to address them in future. But it fails to identify any of them. According to the Global Biodiversity Outlook 2<sup>9</sup>, the five main pressures on biodiversity remain habitat loss and degradation, climate change, excessive nutrient load and other forms of pollution, over-exploitation and unsustainable use of ecosystems and invasive alien species. The CBD lists the main causes of each of those pressures, including land-conversion to agriculture (in practice industrial agriculture), exacerbated by the growing demand for biofuels, 'afforestation' (i.e. tree plantations) on previously non-forested land, urban sprawl, excessive water abstraction especially for irrigation, construction of dams and flood levees, shrimp farms in the tropics and bottom-trawling fisheries<sup>10</sup>.

Excessive demand for agricultural and wood products in industrial countries, not least by the industrial livestock industry, for biofuels production, paper and increasingly wood-based bioenergy production as well as policy and financial supports for industrial agricultural and tree monocultures, for industrial rather than small-scale fisheries, and for industrial logging are clearly amongst the main underlying causes of biodiversity loss. Failing to acknowledge any of the drivers and underlying causes of biodiversity loss contradicts and undermines the stated aim of reducing them.

The Issue Brief on Forests identifies commercial timber extraction, livestock production, agriculture (ignoring tree plantations as discussed above) and charcoal production as being amongst the main drivers of forest destruction. However, it fails to identify any of the underlying causes, such as excessive demand for and global trade in agricultural and wood-based products, perverse incentives for agrofuels, bioenergy and tree plantations, fast-growing demand for meat and dairy, forest destruction for urbanisation, mining and infrastructure<sup>11</sup>.

*Valuation of and accounting for biodiversity as 'natural capital' are proposed as the key and a false solution for biodiversity loss and forest destruction*

The key response to biodiversity loss promoted in the Issue Brief on biodiversity involves the valuation of and accounting for biodiversity as 'natural capital', i.e. the financialisation of biodiversity. Similarly, the Issue Brief on Forests supports 'innovative financial mechanisms', including for REDD+ - i.e. the creation of new

<sup>9</sup> <http://www.cbd.int/gbo2/>, Fig. 4.1

<sup>10</sup> <http://www.cbd.int/gbo3/?pub=6667&section=6711>

<sup>11</sup> See for example Getting to the Roots – Underlying Causes of Deforestation and Forest Degradation and Drivers of Forest Restoration, Global Forest Coalition, 2010, <http://www.globalforestcoalition.org/wp-content/uploads/2010/11/Report-Getting-to-the-roots1.pdf>

markets and trading in forests. We strongly reject this financialisation of biodiversity and ecosystems.

The idea that putting a price of nature will protect biodiversity and ecosystems is deeply flawed. -It gives rise to trading in nature – such as biodiversity offsets which legitimise and facilitate the destruction of biodiversity in one place by promising to replace them with biodiversity protected elsewhere. The idea of biodiversity valuation and markets is broadly modelled on that of carbon markets. Yet carbon trading mechanisms have failed to stem the continuing increases in global greenhouse gas emissions and carbon markets have collapsed in recent years. Valuing biodiversity as ‘natural capital’ means linking the conservation of biodiversity to such a failed model. Financialisation of and trading in biodiversity could further increase biodiversity losses: For example Brazil’s new Forest Code allows landowners to destroy forest if they buy ‘certificates of environmental reserve’ which are traded on a ‘green stock’ market. Its introduction has coincided with a recent increase in deforestation in Brazil – just as social movements and environmental organisations had warned. Financialisation of biodiversity threatens communities because it conflicts with and undermines environmental regulation and protection against destructive investments/developments, because it turns nature and lands into financial, tradeable assets and because it favours institutions and wealthy landowners best able to manoeuvre and exploit complex financial markets<sup>12</sup>.

*The Issue Brief on forests falsely presents “Sustainable Forest Management” as a key solution:*

“Sustainable Forest Management” (SFM) is the main solution proposed in the Issue Brief on forests, with private finance, including ‘innovative mechanisms’ and REDD+ proposed as ways to achieve it. The Issue Brief claims: “*SFM is now widely regarded as one of the most effective tools to combat deforestation and forest degradation and their underlying causes within and outside the forest sector.*” Clearly, different management of forests cannot possibly address underlying causes of deforestation and forest degradation, which lie ‘*outside the forest sector*’, nor any of those listed further above in our comments. Forest destruction cannot be reduced or halted without reducing the wider pressures of forests, not least the excessive and rising demand for wood and agricultural products.

SFM is not defined in the Issue Brief and there are no universally agreed definition and standards for it. The Issue Brief approvingly refers to voluntary certification schemes such as the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC). Both the FSC and the PEFC certify industrial tree plantations and industrial logging as SFM<sup>13</sup>, including practices which few people would consider sustainable, such as evictions and community displacement for tree plantations, killing of wildlife and destruction of forests for industrial tree plantations<sup>14</sup>. Investors, institutions and governments widely class industrial tree plantations and industrial logging, including clearcutting as SFM. As

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<sup>12</sup> For more discussion of the dangers of trading in biodiversity, see <http://wrm.org.uy/all-campaigns/statement-is-open-for-signatures-no-to-biodiversity-offsetting/> .

<sup>13</sup> See for example ‘IKEA’s logging of old-growth forests in Russia’ <http://globalforestcoalition.org/2235-media-release-international-environmental-organizations-condemn-ikeas-logging-of-old-growth-forests-in-russia>

<sup>14</sup> See for example [http://www.fsc-watch.org/archives/2011/10/20/Oxfam\\_report\\_22\\_500](http://www.fsc-watch.org/archives/2011/10/20/Oxfam_report_22_500) and <http://www.mo.be/node/150516>

such, SFM has arguably turned into a driver of forest destruction<sup>15</sup> rather than a solution to it.

### **Recommendations:**

1. We propose an integrated Sustainable Development Goal on “the conservation and sustainable use of ecosystems and natural resources”
2. We also propose a separate SDG on sustainable consumption and production patterns and the limitation of natural resource use, considering fair access to these resources as well as sufficiency worldwide in order to tackle the underlying causes behind biodiversity loss. This goal should include the following specific targets:
  - Putting a cap primarily on energy primarily on fossil energy and a doubling of the worldwide energy efficiency and portion of renewable energies and putting a cap on other natural resource use through proper reduction policies, while ensuring sufficient access for vulnerable people by 2030. As a prerequisite, renewable energy projects with negative effects on the ecological and social conditions regionally or globally should not be supported. This includes large hydropower plants, dams, and large-scale, industrial bioenergy production.
  - From 2015 onwards, the establishment of a key indicator to calculate every country’s natural resource consumption (i.e. Raw Material Consumption (RCM) or ecological footprint<sup>16</sup> along with a national water, land, and CO2 footprint).
  - By 2020, the abolition of environmentally harmful subsidies, and promotion of positive incentives, in accordance with Aichi Target 3 expressed in the CBD Strategic Plan.
  - By 2030, a worldwide implementation of permanent resource recycling, in which the design and manufacture of products follows principles that ensure thriftiness, efficiency, longevity, reusability and recycling; a landfill ban on organic, plastic, and recyclable matter; raising awareness of waste as a resource; as well as a global national agreement on waste for the comprehensive collection of secondary raw materials, financed by producers and distributors..
  - By 2030, the reduction of paper consumption to a sustainable level in all countries with an annual per capita consumption of more than 55 kg, and a maximum annual per capita paper consumption of 60 kg through effective restrictions in consumer behavior, regulation at the production level; an increase of recycling rates; and mandatory use of recycled resources for specific products.
3. The ecosystems and natural resources SDG should include the following specific targets:
  - Zero deforestation and forest degradation by 2030
  - By 2020 effective measures are taken to prevent the further extinction of known species and implement the Strategic Plan of the Convention on Biodiversity and by 2030 measures are taken that will no longer threaten the majority of species still endangered in 2015 with extinction.

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<sup>15</sup> See for example [http://www.globalwitness.org/sites/default/files/pdfs/trick\\_or\\_treat.pdf](http://www.globalwitness.org/sites/default/files/pdfs/trick_or_treat.pdf)

<sup>16</sup> WWF (2012). Living Planet Report 2012. [http://www.wwf.de/fileadmin/fm-wwf/Publikationen-PDF/Living\\_Planet\\_Report\\_2012.pdf](http://www.wwf.de/fileadmin/fm-wwf/Publikationen-PDF/Living_Planet_Report_2012.pdf)

- By 2020, all fisheries should respect ecological limits through “maximum sustainable yield” regulations that take into account the precautionary principle, the ecosystem approach as well as the rights and needs of artisanal fisherfolk
  - Full recognition of all Indigenous territories and marine and terrestrial areas conserved by local communities by 2020
  - By 2020, all countries have established effective policies to recognize and support biocultural conservation approaches by Indigenous Peoples and local communities, in line with the UN Declaration on the Rights of Indigenous Peoples, the Convention on Biodiversity and the Nagoya Protocol
4. Indicators under this goal should include gender-sensitive indicators, and indicators regarding the total area of Indigenous territories and community conserved areas (ICCAs) that are legally recognized.
  5. Biodiversity and forest targets should also be integrated under other SDGs as biodiversity is an essential life-support system for all human sectors.
  6. We strongly oppose a separate Sustainable Development Goal on Forests. Forests are an ecosystem, and should be recognized as such.
  7. We also oppose any “net” goals or targets for forests, land degradation or other ecosystems. The assumption that you would be able to compensate ecosystem or soil loss at one location with ecosystem or soil restoration in another location is deeply flawed from a moral, scientific, and social justice perspective.
  8. We strongly oppose the economic valorization of Nature in any given way, as pricing something –rather than protecting it- gives it a mercantile value, and opens the door to commercializing
  9. We demand that monoculture plantations, or plantations with non-native species, can in no case account as biodiversity rich areas.
  10. We demand that the use of genetically modified trees is banned.
  11. We demand that by 2030, all products produced on industrial scale must contain labelling information regarding:
    - Their origin and impact on Biodiversity
    - For food and other products of organic origin: the kind of soils where they were produced, production processes, etc
    - For industrial products: impact of the industry on the local and global environment
    - For products containing minerals: information on mining processes
    - Ecological footprint of the product
  12. All economic development, including urban development, must take into account the planetary limits regarding biodiversity loss, land use change, and climate change, taking into account that offsetting doesn't solve the problem, as the planetary boundaries are one, and that we have already passed several boundaries.