

CARBON
TRADE
WATCH



To the FCCC/SBSTA

From: Carbon Trade Watch and the World Rainforest Movement

Ref: Submission about implications of reforestation of lands with forests in exhaustion as afforestation and reforestation clean development mechanism project activities

26 March, 2011

Dear Sir/Madam,

Hereby we would like to submit our comments about the issue of ‘forests in exhaustion’, for which you opened until 28 March 2011 a period of consultation.

The **World Rainforest Movement** is an organization that, at a global level, defends forest and forest-dependent people in their struggles to secure their livelihoods against threats such as industrial monoculture tree plantations, dams, mining, roads and other similar projects. WRM has carried out many studies on the issue of the impacts of industrial tree monocultures in a close relationship with the directly affected communities. Attached to this document, you can find a series of references to these studies (See Annex below)

By centring its work on bottom-up community-led projects and campaigns, **Carbon Trade Watch** aims to provide a durable body of research which ensures that a holistic and justice-based analysis of climate change and environmental policies is not forgotten or compromised. As part of our solidarity work, CTW aims to accompany and support movements and communities in their local initiatives and struggles for environmental and social justice as well as works in solidarity with groups, social movements and communities defending their lands from tree plantations and deforestation.

We are extremely concerned about the Board’s definition of ‘forests in exhaustion’ and what would supposedly happen to these ‘forests’, according to Annex 1 of the document FCCC/KP/CMP/2009/16, as well as about the proposal to include as a possible CDM activity reforestation activities on lands that did not contain or contained ‘forests in exhaustion’ on 31 December 1989.

Hereby follow our main points of concern:

1. According to your description of ‘forests in exhaustion’ these supposed ‘forests’ can include industrial tree monocultures. In our supportive work to local communities that are affected by these monocultures, we learned that these tree monocultures have nothing to do with forests. While forests offer a huge range of nutritional, water, medicine, spiritual and other benefits to forest peoples, industrial tree plantations are being called “green deserts” by local communities for the fact they do not offer any benefit, and life is totally absent inside the identical rows of trees of these monocultures which have only one purpose: supplying wood to industry. The

fact that even the FAO still considers industrial tree plantations as forests, has had dramatic consequences for thousands of communities in the South and has favored Industry interests. However, over the past years, many academics, state officials, representatives of different social and environmental organizations, etc. have opposed the FAO definition. The fact that UNFCCC opts for maintaining the FAO definition will perpetuate and create new conflicts all over the world between expanding plantation companies and local communities.

2. This new proposal allows tree plantation companies to present a CDM project for any of their plantations, be these existing or new plantations. What we have learned from the practice is that the companies that built plantations long before 1989 always have counted with sufficient financial support and resources to maintain their activities until now. Especially in the global South where this activity is extremely profitable, and has led to a process that Northern tree plantation companies are in a process of transferring their activities to the Global South where they can make more profits. This is clearly not 'additional' and in fact quite the contrary. Studies have shown that only long-standing (more than 100 years) old growth forests 'capture' and sustain carbon. It is clear that what the industry is aiming at is another subsidy for an already very profitable sector.
3. Industrial tree monocultures of eucalyptus, pine, oil palm and rubber trees cause many negative impacts, in spite of a discourse of industry that it is a 'sustainable and renewable' sector. The links below show very clearly that these plantations have severe impacts on the land distribution, expelling people directly and indirectly from their land. Large scale plantations have huge impacts on water resources availability and quality and several scientific studies on the issue are also publicly available. Plantation companies need to apply pesticides that affect soil, biodiversity and the workers. This type of agricultural activity creates 10 to 15 times fewer jobs if compared with small-scale agricultural production and the majority of jobs are dangerous and relatively badly paid. Women are most impacted by industrial tree monocultures. And also, the expansion of these monocultures continues to be one of the important direct and indirect drivers of deforestation, which means in fact the emission of even more carbon to the atmosphere.
4. And finally, but of extreme importance: be it plantations or be it forests, neither is able to guarantee a structural and long-lasting contribution to mitigate global warming, because, among other reasons, the carbon emissions resulting from deforestation may be chemically identical to those coming from the burning of fossil fuels, but the two are climatologically different. Carbon released from deforestation does not increase the total amount of carbon being exchanged among the atmosphere, the oceans, soils, forests, and so on. Carbon released from fossil fuels, on the other hand, does increase this above-ground carbon pool

Yours sincerely,

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Annex

Carbon Trade Watch publications:

[Africa's pollution and land grab threat from UN carbon market](#)

Tuesday, 15 March 2011 | The Gaia Foundation, Carbon Trade Watch and Timberwatch



The United Nation's carbon offset mechanism is rewarding pollution, and could lead to a land grab for industrial biofuels, tree plantations, genetically modified crops and biochar projects in Africa. A new briefing, titled "The CDM in Africa: marketing a new land..." [Read More](#)

[International Women's Day actions](#)

Saturday, 05 March 2011 | Women for Climate Justice Network
Climate change, one of most serious problems facing the world today, will have disastrous consequences for everyone, and especially for women. What is most tragic is that women will also suffer especially from the false solutions for climate change that are being negotiated... [Read More](#)

[Outcomes of REDD+ in Cancun: a flawed plan for the world's remaining forests](#)

Thursday, 20 January 2011 | Tamra Gilbertson
Within the year between the UN Copenhagen climate negotiations in 2009 and the Cancun negotiations in 2010, the framework of the Reducing Emissions from Deforestation and Degradation (REDD) mechanism advanced from a bracketed text to a nearly established architecture depicting the... [Read More](#)

[Two Pluses Don't Make a Positive: REDD and agriculture](#)

Thursday, 20 January 2011 | Oscar Reyes
It is one of the first laws of diplomacy: when it is hard to agree on an answer, change the question. Reducing Emissions from Deforestation and Degradation (REDD) schemes are the product of two of these diplomatic back-flips. First, whereas the Kyoto Protocol included no forestry or land-use... [Read More](#)

[Turning farms into carbon sinks: Agriculture and the COP16 in Cancun](#)

Thursday, 20 January 2011 | Joanna Cabello
Emissions targets related to land use, land use change and forestry (known in the jargon as LULUCF) were not included in the Kyoto Protocol, the international climate change treaty signed in 1997, but played a central role in the latest round of UN climate negotiations in... [Read More](#)

[World Bank Partnership for Market Readiness: a critical introduction](#)

Thursday, 20 January 2011 | Oscar Reyes
When the World Bank gets busy, it usually spells bad news for people and the planet. The UN Climate Change Conference (COP16) in Cancun was no exception,

with the Bank launching a flurry of new climate-related initiatives. Chief amongst these was the Partnership for Market Readiness (PMR)... [Read More](#)

[Carbon markets after Cancun: Carbon Capture and Storage in the Clean Development Mechanism](#)

Thursday, 20 January 2011 | Oscar Reyes
The inclusion of Carbon Capture and Storage (CCS) in the UN's Clean Development Mechanism (CDM) is a boon for the Middle East and North Sea oil industries, which would use the scheme to subsidise the extraction of even more oil from the ground... [Read More](#)

[A look into Cancun climate justice protests](#)

Thursday, 20 January 2011 | Joanna Cabello
As delegates to the United Nations Climate Change Conference (COP16) gathered inside the exclusive installations of the Moon Palace resort in Cancun, social movements raised their voices in protest. In castellano The Cancun negotiations were... [Read More](#)

[No REDD, A Reader](#)

Monday, 06 December 2010 |



New publication exposes links between REDD and carbon trading, International Financial Institutions, extractive industries, GMO trees and biotech
No REDD, A Reader aspires to broaden the debate on the Reducing Emissions from Deforestation and Forest... [Read More](#)

[Fast Forest Cash: How REDD+ will be market-based](#)

Friday, 03 December 2010 | Tamra Gilbertson
The Early Years Since the earliest experiences of offsetting forest have been used as tradable carbon credits.¹ The initial practice of forest offsetting in Costa Rica and Papua New Guinea in the early 1990s established a precedent for inclusion of tradable carbon sequestration offsets... [Read More](#)

[Enclosure of Forests and Peoples: REDD and the Inter-Oceanic Highway in Peru](#)

Wednesday, 10 November 2010 | Joanna Cabello
The dominant voices within the UN climate negotiations, together with corporate lobbies, mainstream NGOs and multilateral financial institutions, are pushing for another false solution to climate change. Arguing that a standing tree must have more (monetary) value than a cut one, they privatise... [Read More](#)

World Rainforest Movement publications on Monoculture tree plantations

WRM has been researching on the issue of impact of monoculture tree plantations since 1996 when it published "Pulping the South: industrial tree plantations and the world paper economy". Ricardo Carrere & Larry Lohmann. 1996. Also in Spanish <http://www.wrm.org.uy/plantations/material/pulping.html>

In 1999 WRM publishes:

- "Tree Plantations: Impacts and Struggles" a selection of articles published in the World Rainforest Movement's (WRM) Bulletin. Also in Spanish <http://www.wrm.org.uy/plantations/material/impacts.html>

- A summary of the book "Pulping the South" was published: "Pulpwood Plantations: a growing problem. Available also in Spanish <http://www.wrm.org.uy/plantations/material/problem.html>

- "Ten replies to ten lies" A reply to the ten most common misleading statements being disseminated about large-scale monoculture tree plantations:.. Available also in Spanish, French and Portuguese <http://www.wrm.org.uy/plantations/material/lies.html>

In 2000, "The carbon shop: planting new problems" by Larry Lohmann. A thorough study of the false assumption that a specified fragment of wooded land can "offset" a specified amount of industrial carbon-dioxide emissions. Demonstration on how large-scale "offset" plantations, instead of mitigating global warming, could even make it worse. Available also in Spanish, French and Portuguese <http://www.wrm.org.uy/plantations/material/carbon.html>

In 2002, "The Pulp Invasion: The international pulp and paper industry in the Mekong Region" by Chris Lang. <http://www.wrm.org.uy/countries/Asia/mekong.html>

In 2003:

- "Plantations are not forests". The second selection of articles published in the monthly electronic bulletin of the World Rainforest Movement, addressing the issue of the impacts of large scale monoculture tree plantations. Also available in Portuguese and Spanish <http://www.wrm.org.uy/plantations/material/book.html>

- "Certifying the Uncertifiable. FSC Certification of Tree Plantations in Thailand and Brazil" A contribution to the debate over the certification of large-scale tree monocultures. Also available in Portuguese and Spanish <http://www.wrm.org.uy/actors/FSC/uncertifiable.html>

In 2005:

- "Pulp Mills: From monocultures to Industrial Pollution" Third selection of stories of environmental degradation and social dispossession related to pulp and paper production. Also available in Spanish and Portuguese http://www.wrm.org.uy/plantations/pulp_mills_book.htm

- "Carbon Sink Plantations in the Ecuadorian Andes". Impacts of the Dutch FACE-PROFAFOR monoculture tree plantations' project on indigenous and peasant communities. Also available in Spanish <http://www.wrm.org.uy/countries/Ecuador/face.html>

- "Promises of Jobs and Destruction of Work. The case of Aracruz Celulose in Brazil" By: Alacir De'Nadai, Winfridus Overbeek, Luiz Alberto Soares. Also available in Spanish and Portuguese <http://www.wrm.org.uy/countries/Brazil/fase.html>

- "Women, forests and plantations. The gender Dimension" Selection of articles published in the monthly electronic bulletin of the World Rainforest Movement, addressing the gender dimension of the impacts in the forests of plantations. Also available in French and Spanish <http://www.wrm.org.uy/subjects/women/text.html>

- "The Economic and Social Context of Monoculture Tree Plantations in Chile: the Case of the Commune of Lumaco, Araucania region" By means of testimonials, documents and figures, the report sets out the problems faced by that commune of 11,405 inhabitants, where monoculture tree plantations have expanded violently, imposed by a forestry development model instituted during the military dictatorship and still currently in force.- Also available in Spanish <http://www.wrm.org.uy/countries/Chile/BookLumaco.html>

- "A Study of the Social and Economic Impacts of Industrial Tree Plantations in the KwaZulu - Natal Province of South Africa" By John Blessing Karumbidza <http://www.wrm.org.uy/countries/SouthAfrica/book.html>

In 2006:

- "The death of the Forest: A Report on Wuzhishan's and Green Rich's Plantation activities in Cambodia" Proponents of industrial tree plantations argue that the plantations are "reforestation", increasing the area of forest, providing jobs for local people, or reducing pressure on natural forests. This report examines these companies' operations in Cambodia,

the impacts observed to date on the local populations and the environment, and the associated human rights violations. <http://www.wrm.org.uy/countries/Cambodia/BookCambodia.html>

- “Greenwash: Critical analysis of FSC certification of industrial tree monocultures in Uruguay” by Ricardo Carrere. This report provides documented information and analysis to all those who are currently struggling against large-scale monoculture tree plantations and must face the additional problem posed by the fact that these same plantations are being certified by the FSC. Also available in Spanish <http://www.wrm.org.uy/countries/Uruguay/book.html>

- “Monoculture tree plantations in Ecuador” By Patricia Granda
Through three case studies and an overview of the history of plantation activity in the country, this publication seeks to present a comprehensive and up-to-date picture of the serious threat posed by tree plantations in Ecuador, of which most of the population has been largely unaware until now. Also available in Spanish. <http://www.wrm.org.uy/countries/Ecuador/book2.pdf>

- Social conflict and environmental disaster: A report on Asia Pulp and Paper’s operations in Sumatra, Indonesia. By Rivani Noor and Rully Syumanda <http://www.wrm.org.uy/countries/Indonesia/book8.html>

-“A funny place to store carbon”: UWA-FACE Foundation’s tree planting project in Mount Elgon National Park, Uganda. By Chris Lang and Timothy Byakola <http://www.wrm.org.uy/countries/Uganda/book.html>

In 2007, Swaziland: The myth of sustainable timber plantations. By Wally Menne and Ricardo Carrere. Although Swaziland is not a very well known country, many foresters not only know about its existence but are even able to use it as an example of “sustainable plantation forestry”. The person responsible for this is Professor Julian Evans – an English forester – who has for years been promoting the view that the Sappi Usutu Pulp Company’s pine plantations in that country are “sustainable”. This research demonstrates that the impacts of plantations in Swaziland were as negative as elsewhere. <http://www.wrm.org.uy/countries/Swaziland/book.html>

In 2008:

- “Women and Eucalyptus Stories of Life and Resistance” Impacts of Eucalyptus Monocultures on Indigenous and AfroBrazilian Women in the State of Espírito Santo. Brasil, By Gilsa Barcellos and Simone

Ferreira. Also available in Portuguese and Spanish. http://www.wrm.org.uy/countries/Brazil/Book_Women.html

- “FSC certification of tree plantations needs to be stopped”. Plantations are monocultures, created from seemingly endless rows of identical trees. They suck the water out of nearby streams and ponds and lower the water table, leaving little or no water for people living near the plantations. They deplete soils, pollute the environment with agrotoxics and eradicate biodiverse local ecosystems. But what’s almost as bad as the plantations themselves is that this sort of plantation is given a green seal of approval by the Forest Stewardship Council. Also available in Spanish and Portuguese. http://www.wrm.org.uy/actors/FSC/WRM_Briefing.pdf

- “Plantations, poverty and power: Europe’s role in the expansion of the pulp industry in the South”, By Chris Lang http://www.wrm.org.uy/publications/Plantations_Poverty_Power.pdf

-Working conditions and health impacts of industrial tree monocultures. Also available in Spanish http://www.wrm.org.uy/plantations/Working_conditions_and_health.pdf

- “Tree plantations in the Mekong region” Eucalyptus, oil palm, rubber and jatropha monoculture plantations are expanding onto local communities’ lands and forests in the Mekong region’s countries. This research shows how although promoted under the guise of development, poverty alleviation and even climate change mitigation, such plantations are resulting in severe social and environmental impacts. Also available in Cambodian , Thai and Lao <http://www.wrm.org.uy/publications/briefings/Mekong.pdf>

- Timber Plantations in Southern Africa. An Overview of the opposition to large scale timber plantations (mainly in South Africa, Zimbabwe, Swaziland and Mozambique). <http://www.wrm.org.uy/publications/briefings/SouthernAfrica.pdf>

In 2010, “The Expansion of Tree Monocultures in Mozambique. Impacts on local peasants communities in the Province of Niassa” by Winfridus Overbeek Also available in Portuguese. <http://www.wrm.org.uy/countries/Mozambique/book.pdf>

WRM has also published many other articles showing the different impacts of monoculture tree plantations in many parts of the world. They are all available at: <http://www.wrm.org.uy/plantations/index.html>