

Joint Submission-ART's Beyond Carbon Benefits (BCB) Certification Standard (Draft June 2025)

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Executive Summary

ART Secretariat 2451 Crystal Drive, Suite 700 Arlington, Virginia 22202

Dear ART Secretariat and Board,

We appreciate ART's initiative in developing the **Beyond Carbon Benefits (BCB) certification**, an innovative framework to recognize jurisdictional REDD+ programs for their positive social and environmental impacts beyond carbon. The draft BCB standard is comprehensive and ambitious, encompassing three modules (Social-Cultural, Biodiversity, and Forest Services). We especially appreciate the inclusive development process (e.g. co-design with Indigenous Peoples and Local Communities) and the standard's potential to incentivize holistic REDD+ outcomes.

Our submission presents a technical review of the draft BCB standard in the context of ART's draft TREES 3.0 safeguard requirements. The goal is to ensure **BCB complements rather than duplicates** the baseline TREES safeguard requirements The review involved a detailed mapping of all BCB indicators against the corresponding UNFCCC Cancun Safeguards (as operationalized in TREES 3.0). By identifying where each BCB indicator aligns with existing safeguard themes and where it extends beyond them, the analysis clarifies BCB's scope and distinct purpose. We view the crosswalk table mapping BCB indicators to TREES safeguards (included as Section II of our submission) as an initial step- we recommend ART convene stakeholders to refine this mapping for inclusion in the BCB. Ultimately, we propose a set of refinements to the BCB standard's text to eliminate redundancies, clarify intent, and highlight truly "beyond-compliance" co-benefits.

This submission is offered to support the prompt and the effective operationalization of this important addition to ART's toolkit for high-integrity jurisdictional REDD+ programs. Our aim is to bolster BCB's credibility as a mechanism to showcase additional social and environmental achievements, while avoiding any inadvertent undermining or duplication of the core safeguards that ART participants must already meet under TREES. It is critical BCB not shift any outcome compliance obligations away from TREES.

In the following sections, we outline our key findings and recommendations to refine the BCB standard for clarity and effectiveness.

Summary of Key Findings

1. Significant Overlap with TREES safeguards

Many BCB requirements closely mirror TREES 3.0 safeguard obligations, indicating substantial overlap. For example, the Social-Cultural module's indicators on equitable benefit-sharing with IPLCs, recognition of land and resource rights, and inclusive participation are already core requirements under TREES (reflecting Cancun Safeguards B, C, D, and E- safeguards intended not only to prevent harm but also to promote social and environmental outcomes). Similarly, the BCB Biodiversity module demands protecting natural forests and preventing biodiversity loss, directly aligning with TREES Safeguard E (which prohibits natural forest conversion and mandates avoiding harm to biodiversity). Even the new Forest Services module – focusing on co-benefits like water quality and soil retention – reinforces expectations implicit in TREES (jurisdictions must ensure no adverse impacts on critical ecosystem services such as watersheds). In short, a number of BCB indicators are not truly "optional extras" but rather reiterations of baseline safeguard requirements that any TREES-compliant REDD+ program must fulfil. If this duplication is left unclarified, it risks redundant reporting and confusion about BCB's added value, raising the potential for "safeguards fatigue" if jurisdictions perceive BCB as merely repackaging existing obligations. To avoid this, BCB needs to clearly

differentiate its value-add – verifying genuine beyond-compliance outcomes rather than simply reconfirming compliance. BCB must not serve as a second verifier of safeguard compliance. Where overlap with TREES 3.0 exists, those elements should be removed unless they are clearly reworked to demonstrate an additional beyond-carbon benefit.

2. Distinct Beyond-Carbon Benefits and Performance Outcomes

Crucially, our analysis finds that BCB does introduce clear extensions and added value beyond TREES safeguards. In several areas, BCB pushes beyond compliance by requiring measurable, performance-based outcomes that TREES does not explicitly quantify. For instance, TREES requires that benefit-sharing be designed transparently and participatorily, but BCB asks for concrete evidence of benefit delivery – such as the percentage of REDD+ revenues actually reaching IPLCs through culturally appropriate mechanisms. This shift from planning to verified outcomes raises the bar on accountability and equity. BCB also addresses important topics outside TREES's application—to date, including going beyond passive recognition and protection—of Indigenous knowledge systems and cultural heritage, and formally acknowledging—IPLC carbon rights. Likewise, the Forest Service's module introduces specific performance metrics for ecosystem services, requiring jurisdictions to maintain or improve forest cover in riparian zones for water quality and on erosion-prone slopes for soil stabilization, and to report on outcomes (e.g. hectares of habitat restored). By turning these co-benefits into tracked metrics, BCB ensures that outcomes like clean water and soil retention are treated as integral measures of program success. These features showcase BCB's distinct value: it goes beyond safeguard compliance by verifying quantifiable social, cultural, and environmental co-benefits that standard carbon accounting alone does not capture.

Summary of Key Recommendations

To fully realize BCB's potential as a high-integrity, beyond-carbon certification, we recommend the following refinements to the draft standard:

1. Clarify BCB's Relationship to TREES Safeguards

Explicitly acknowledge in BCB that it builds upon (and does not duplicate) the UNFCCC Cancun Safeguards already enforced through TREES. Clearly delineate where TREES requirements end and BCB begins. This can be achieved by including a simple cross-reference matrix (annexed to the standard) mapping each BCB indicator to the corresponding TREES 3.0 safeguard. Such a reference will make it clear that BCB's role is to add beyond-compliance outcomes and not to shift or re-verify any existing safeguard obligations away from the TREES framework. This clarification will prevent any implication that fundamental protections (e.g. land rights, participation, no-conversion of forests) are "extra" in BCB, and will reinforce that BCB is not a parallel safeguard compliance check but a recognition of *additional* positive results.

2. Remove or Revise Redundant Indicators

To streamline the standard and avoid duplication, remove any BCB indicator that simply reiterates a TREES safeguard requirement, unless it can be modified to demonstrate clear beyond-carbon value. If an indicator does not introduce a new performance criterion, outcome measurement, or expanded scope beyond what TREES already mandates, it dilutes BCB's purpose. Eliminating such overlap will tighten the focus on true cobenefit enhancements and reduce confusion for implementers and auditors.

3. Emphasize "Beyond Compliance" in Wording

Refine the language of individual BCB indicators to underscore that they expect performance above and beyond baseline requirements. Even small phrasing changes can help differentiate co-benefit achievements from minimum safeguards. For example, where the draft says, "strengthened the necessary enabling

conditions for participation" (Social Indicator 2-2), it could be revised to "strengthened enabling conditions beyond those already in place to satisfy TREES", signalling that a basic level of community participation is assumed under TREES safeguards, and BCB is rewarding improvements on top of that foundation. In general, any phrasing that reads like merely meeting a minimum requirement should be reworked to highlight improvement, enhancement, or expansion beyond the status quo. This will ensure BCB is perceived as rewarding additional progress rather than giving credit for obligations that are already expected. In cases where removing an overlapping indicator isn't feasible, an explanatory note could clarify that the requirement is a baseline precondition (due to TREES compliance) and that BCB credit is contingent on outcomes exceeding that baseline.

4. Strengthen Evidence Requirements for BCB Outcomes

Tighten the verification criteria so that BCB certification reflects delivered benefits, not just plans or intentions. BCB should serve as a mark of real performance on the ground rather than aspirational policy. We recommend requiring clear, time-bound evidence for each indicator to show that measurable outcomes have occurred by the time of verification. For instance, for benefit-sharing with communities (Social Indicator 1-1), the standard should require proof that funds have been disbursed or benefit-sharing mechanisms are operational by the verification date – not merely an agreement or policy promising future benefits. If a jurisdiction claims that communities "are going to receive" REDD+ benefits, BCB should insist on documentation that at least some benefits have already been delivered (or are in the process of delivery on a defined timeline). Applying this principle across the board will enhance credibility: e.g. requiring evidence of hectares of habitat actually restored, the number of community members trained or benefitting, or improvements in water quality metrics, rather than accepting only intent or plans. Additionally, ART could consider defining indicative benchmarks or minimum thresholds for key indicators (for example, a certain percentage of REDD+ revenue that should reach local communities, or a minimum area of riparian forest maintained) to guide both implementers and verifiers on what constitutes a meaningful co-benefit achievement. These steps would elevate BCB from a narrative reporting add-on to a robust performance certification for co-benefits.

5. Clarify the Mandatory vs. Optional Indicator Structure

Provide clear guidance on the role of mandatory and optional indicators within BCB. We applaud the requirement that jurisdictions meet criteria across all three modules (Social-Cultural, Biodiversity, and Forest Services), as this ensures balanced attention to diverse co-benefits and sets a high bar for certification. Within each module, however, participants can choose from a set of optional indicators. ART should explicitly explain the rationale for this optionality – for example, whether it is to accommodate differing national contexts, capacities, or baseline conditions. Clear instructions should be given on how jurisdictions should select optional indicators and how auditors will evaluate them. Moreover, clarify whether the number or ambition of optional indicators selected will influence the certification outcome. For instance, will there be any scoring system, weighting, or tiered recognition (e.g. bronze/silver/gold levels) based on optional indicators achieved, or will it simply be a pass/fail add-on certification? Providing this clarity will help participants plan their BCB efforts strategically and ensure the add-on process is streamlined and transparent. In short, jurisdictions need to know how much flexibility they have and whether choosing more or fewer optional indicators (or more ambitious ones) affects the level of recognition they receive.

6. Provide Targeted Auditor Training

In light of the potential for confusion between verifying TREES safeguard compliance and verifying BCB's additional indicators, ART should invest in additional training and guidance for approved verifiers (VVBs). This training should draw on a publicly available TREES-BCB mapping matrix (as noted in Recommendation 1) that clearly shows the alignment and differences between TREES requirements and BCB indicators. Training materials would ideally include concrete examples of activities or evidence that satisfy each BCB

indicator, highlighting the added value that BCB is looking for beyond TREES. By equipping auditors with a clear understanding of BCB's intent and its relationship to TREES, ART can ensure consistent, accurate assessments and prevent any misapplication of standards. This will help VVBs confidently distinguish what counts as baseline compliance (to be checked under TREES) versus what constitutes a beyond-carbon cobenefit (to be verified for BCB certification). Making the TREES-BCB mapping matrix public will ensure effective participation and manage expectations among ART participants and other relevant stakeholders.

7. Align BCB Finalization with TREES Updates

We recommend that ART finalize the BCB standard only after the pending TREES 3.0 revisions are fully approved and integrated. By sequencing BCB's completion to follow the TREES 3.0 update, ART can make any final adjustments needed to ensure perfect complementarity and avoid any duplication or misalignment between the two standards. In practice, this means also finalizing the BCB-TREES indicator crosswalk (and associated guidance) in step with the final TREES 3.0 safeguard text. This timing will help ensure that BCB truly reflects additional benefits on top of a stable TREES safeguard foundation, and that jurisdictions and auditors are not confronted with changing targets. Coordinating the rollout of BCB with the final TREES 3.0 will thus safeguard the integrity and clarity of both standards.

Conclusion

The draft BCB standard represents a valuable step toward integrating sustainable development co-benefits into carbon crediting. With the above refinements, we believe BCB can fully achieve its promise. Implementing these recommendations will allow ART to avoid redundancy, confusion, or misinterpretation that could undermine the integrity of TREES safeguards, thereby making BCB a more streamlined and powerful tool for showcasing beyond-carbon achievements. BCB certification would then truly highlight the additional social, cultural, and ecological outcomes of REDD+ programs, while simultaneously reinforcing (not duplicating) the Cancun Safeguards already embedded in TREES. In practical terms, clearly differentiating baseline safeguard compliance from co-benefit enhancements – through explicit language and the suggested indicator crosswalk – will ensure all stakeholders understand BCB's additive role.

Furthermore, any redundant indicators should be removed or reworded so that BCB never appears to give credit for merely meeting basic TREES obligations. Every BCB criterion should be refocused on genuine enhancements beyond the status quo, with wording that emphasizes improvement and a requirement for evidence of performance. By adopting these changes, BCB will stand as a credible, non-duplicative "beyond compliance" certification that jurisdictions pursue in order to demonstrate real extra value on top of TREES requirements. This sharpening of purpose is expected to boost confidence in BCB's integrity and usefulness, encouraging more REDD+ jurisdictions to seek BCB certification as a way to document and gain recognition for their co-benefit outcomes.

We appreciate the opportunity to provide feedback on the BCB standard. In our view, the above adjustments will strengthen the standard's credibility and usability, ensuring its application remains consistent across jurisdictions and over time. We commend ART for its commitment to upholding high social and environmental integrity, and we are confident that with these refinements, the BCB certification will become a robust tool to showcase and incentivize the beyond-carbon benefits of REDD+ programs, aligning climate action with broader social and environmental goals in a transparent and verifiable manner .

I. Introduction and Context

The Architecture for REDD+ Transactions (ART) has released a draft "Beyond Carbon Benefits" (BCB) certification standard for public comment (June 2025). This optional certification is designed to document and reward the positive social, cultural, biodiversity, and ecosystem service outcomes of jurisdictional REDD+ programs, beyond the carbon emission reductions that ART's TREES standard certifies. BCB is organized into three modules – Social-Cultural, Biodiversity, and Forest Services – reflecting different categories of co-benefits. BCB is explicitly intended to complement TREES and "reinforce the Cancun Safeguards" by verifying positive outcomes that go beyond emissions reductions and address social, environmental and governance co-benefits.

This submission provides a technical analysis of the BCB standard, with particular focus on the Social-Cultural module, and a comparison of BCB's indicators against the safeguard requirements in TREES 3.0 (the draft July 2025 version of The REDD+ Environmental Excellence Standard). We identify areas where **BCB** indicators substantively overlap with **TREES (Cancun)** safeguard obligations, and where BCB pushes further to capture "additional benefits." We then propose textual clarifications to reduce redundancy and confusion, and present a brief commentary with recommendations for refining the BCB certification. The goal is to ensure BCB achieves its aim – highlighting beyond-carbon co-benefits – without inadvertently duplicating or muddying the baseline safeguards that ART Participants must already meet under TREES.

II. Mapping BCB Indicators to TREES 3.0 Safeguard Themes

The table below maps the **BCB draft indicators** (organized by module and theme) to the **relevant TREES 3.0 safeguard requirements** (drawn from the UNFCCC Cancun Safeguards A–G as operationalized in TREES 3.0 Section 12). This mapping highlights where BCB's requirements align with **existing safeguard themes** and whether they appear to **reiterate those safeguards and/or extend beyond them**.

BCB Module & Theme	Representative BCB Indicator(summary)	Corresponding TREES 3.0 Safeguard Theme(s)	Overlap or Extension
Social-Cultural – Theme 1: Sustainable Indigenous & Community Economy	Mandatory Indicator 1-1: IPLCs have directly received (or are going to receive according to the agreements reached between the Participant and the IPLCs) funds, carbon credits and/or other non-monetary benefits from the REDD+ Program's benefit sharing, e.g. investments in community infrastructure such as water, drainage, wastewater treatment, education, roads, protection of sacred or spiritually valuable sites, health benefits, etc. Mandatory Indicator 1-2: The REDD+ program contributes to establishing and operating mechanisms agreed with the IPLCs for channelling funds that are accessible, culturally appropriate, and without excessive requirements for the communities. Mandatory Indicator 1-3: The REDD+ program contributes to financing the actions planned, prioritized, and decided in the	Theme 2.2-Outcome Indicator: Public institutions have carried out REDD+ activities and the distribution of REDD+ benefits in a transparent and accountable manner, preventing corruption. Theme 5.3Outcome Indicator: Public institutions have designed and implemented the REDD+ activities and the distribution of REDD+ benefits to enhance social benefits and ensure that women, youth and vulnerable groups also benefit from the REDD+ actions and the distribution of REDD+ benefits. Theme 4.1Outcome Indicator: Public institutions have respected, protected and fulfilled the right of all relevant stakeholders, including women, youth and vulnerable groups, to participate fully and effectively in the design and implementation of REDD+ activities and	Overlap: BCB's mandatory Indicators 1-1, 1-2, and 1-3 require that IPLCs directly receive funds, carbon credits, or other benefits and that accessible, culturally appropriate mechanisms exist for benefit-sharing. This mirrors core safeguard obligations under TREES Safeguard B, C, D and Safeguard E. In TREES 3.0, jurisdictions must distribute REDD+ benefits in a "transparent and accountable manner, preventing corruption" and ensure that "women, youth and vulnerable groups also benefit" from those actions. TREES Safeguard D's outcome indicators further require that all stakeholders, including IPLCs, "participate fully and effectively" in the design of REDD+ activities and benefit-sharing decisions, and that IPLC participation occurs through their own decision-making structures using culturally appropriate processes. BCB's Theme 1 indicators reinforce these requirements by embedding equitable, direct benefit-sharing with IPLCs as a condition, essentially reiterating that REDD+ programs

territorial management instruments (life plans, strategic plans, territorial management plans, etc.) of IPLCs and ensures effective participation of community members, including women and youth, in these.

Optional Indicator 1-4: Revenues derived from REDD+ program strengthen pre-existing sustainable enterprises and/or promote new sustainable enterprises in local or Indigenous communities where the REDD+ Program is implemented.

decisions about the distribution of REDD+ benefits.

Theme 4.2- Outcome Indicator: Public institutions have guaranteed that the participation of Indigenous Peoples, Local Communities, Afro-descendant Peoples or equivalent in the design and implementation of REDD+ activities as well as in the decisions about the distribution of REDD+ benefits occurred through their respective decision-making structures and processes, ensuring adequate conditions for their participation and using culturally appropriate procedures.

must have inclusive benefit distribution in line with what TREES already mandates.

Extension: BCB goes beyond TREES by adding new performance dimensions to benefit-sharing. In addition to requiring the existence of benefitsharing mechanisms, BCB emphasizes quantitative outcomes and socio-economic impacts. BCB links benefit-sharing to IPLCdefined development priorities, such as life plans and territorial management instruments. This alignment with self-determined development frameworks is not required in TREES and represents a deeper commitment to rights-based development. Jurisdictions are expected to document the percentage of REDD+ revenue shared with IPLCs, per-capita benefit amounts, or evidence of community livelihood initiatives. BCB's optional indicator 1-4 encourages REDD+ to strengthen or incubate community enterprises, moving beyond distributive equity into productive and regenerative economic participation, which is not a focus of TREES safeguards. TREES focuses on qualitative compliance – confirming that benefit-sharing is fair and inclusive – but does not ask for detailed metrics on benefit distribution. BCB, in contrast, treats benefit delivery as a measurable co-benefit. By requiring jurisdictions to report concrete benefit outcomes (not just processes), BCB raises the bar beyond TREES' safeguards. It effectively turns benefit-sharing into a tracked performance indicator, adding rigor and accountability in demonstrating that REDD+ programs are actually

Social-Cultural –
Theme 2: Enabling
Conditions &
Capacity Building

Mandatory Indicator 2-1: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to strengthening the knowledge and capacities of IPLC and their representative institutions, including on:

- Rights and safeguards under REDD+
- REDD+, carbon market and options for participation of IPs and LCs in REDD+
- Ecosystem services
- Monitoring, Reporting, and Verification (MRV) Tools for REDD+
- Negotiation in REDD+ Jurisdictional Processes

Mandatory Indicator 2-2: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) generated or strengthened the necessary enabling conditions for the participation and Theme 4.1.- Outcome Indicator: Public institutions have respected, protected and fulfilled the right of all relevant stakeholders, including women, youth and vulnerable groups, to participate fully and effectively in the design and implementation of REDD+ activities and decisions about the distribution of REDD+ benefits.

Theme 4.2- Outcome Indicator: Public institutions have guaranteed that the participation of Indigenous Peoples, Local Communities, Afro-descendant Peoples or equivalent in the design and implementation of REDD+ activities as well as in the decisions about the distribution of REDD+ benefits occurred through their respective decision-making structures and processes, ensuring adequate conditions for their participation

improving local economies (not merely designed to do so). This is an extension of the safeguard: BCB ensures that how much and how benefits flow to IPLCs is verified, whereas TREES simply requires that benefits are shared in principle. Finally, while not explicitly stated, BCB's framing allows for the tracking of benefit-sharing by demographic group (e.g., women, youth), further enhancing social accountability and targeting equity outcomes, another layer not required under TREES.

Overlap: BCB's Theme 2 (Indicators 2-1, 2-2, plus optional 2-6) centres on building IPLCs' knowledge, skills, and institutional capacity to engage in REDD+. This aligns closely with TREES Safeguard B, D's and C's requirements for the "full and effective participation" of stakeholders. Under TREES, jurisdictions must ensure stakeholders have the opportunity and ability to participate in REDD+ decision-making. In fact, TREES outcome indicators explicitly mandate that IPLCs have "adequate conditions for their participation and using culturally appropriate procedures". TREES also requires transparent information-sharing – the public must have access to information and be able to exercise their right to know about REDD+ activities, benefit distribution, and how safeguards are addressed. BCB's capacitybuilding indicators echo these requirements: for instance, Indicator 2-1 calls for training IPLCs on REDD+ rights, carbon markets, MRV, etc., while Indicator 2-2 calls for creating the conditions

influence of IPLCs and their representative institutions in public decisions and policies, including the enabling conditions for participation of women and youths from Indigenous Peoples and Local Communities.

Optional Indicator 2-6: Optional Indicator 2-6: The REDD+ program provides concrete means for IPLCs to participate in monitoring and evaluation activities of REDD+ components, activities, and/or results

and using culturally appropriate procedures.

Theme 2.1: Outcome Indicator: Public institutions have provided access to information, and the public has been aware of and exercised the right to seek and receive official information on REDD+ activities and REDD+ benefit distribution as well as on how safeguards have been addressed and respected.

Theme 3.3: Outcome Indicator: Public institutions have respected, protected and fulfilled the rights of Indigenous Peoples, Local Communities and Afro-descendant Peoples, or equivalent, including uncontacted peoples and transhumant communities in the design and implementation of REDD+ activities and REDD+ benefit distribution.

(including for women and youth) to influence policies.

Extension: BCB converts what are qualitative safeguard expectations into explicit, measurable outcomes. TREES asks that stakeholders be able to participate in an informed manner, but it does not require proof of specific capacity-building efforts. BCB, on the other hand, requires jurisdictions to demonstrate that they have actually provided education, training, and resources to IPLCs and defines specific technical domains for capacity building. The number of workshops held, the curricula on rights and carbon literacy, the establishment of new participatory bodies, and budget allocated for community capacity are all examples of evidence BCB would capture. In short, BCB incentivizes jurisdictions to invest in and document capacitybuilding. Indicator 2-2 shifts the ambition from "participation in REDD+" to "influence in public policy" indicating a systemic role for IPLCs beyond REDD+ implementation. TREES Safeguard D ensures participation rights, but BCB rewards tangible steps like new community institutions or co-management arrangements that result from empowered participation. This is a clear extension: BCB moves from "provide opportunities to participate" to "show how participation and capacity have been strengthened and institutionalized."

Social-Cultural – Theme 3: Territorial Rights

Mandatory Indicator 3-1: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to consolidate the legal recognition of IPLC land ownership rights.

Mandatory Indicator 3-2: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to reducing existing barriers (i.e. legal, regulatory, cultural, economic) to progress towards gender equity in access to land and natural resources and to strengthening women's ownership, use and/or access rights to land and natural resources.

Mandatory Indicator 3-3: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to the jurisdiction developing or strengthening a legal framework and/or official policies that avoid retrogression and that recognize the rights of the IPLCs to the ownership of or benefits from CO2 emission reductions and removals associated with their lands and/or activities.

Mandatory Indicator 3-4: The REDD+ program has either directly (REDD+ planned Theme 2.3- Outcome Indicator: Public institutions have recognized, inventoried, mapped, and secured customary and statutory land and resource tenure rights relevant to the implementation of REDD+ activities and ensured that stakeholders had access to, use of, and control over land and resources throughout the implementation of REDD+ actions. REDD+ activities have not caused any involuntary relocation without the free, prior, and informed consent (FPIC) of any Indigenous Peoples, Local Communities, Afro-descendant Peoples or equivalent stakeholders.

Theme 3.2: Outcome Indicator: Public institutions have respected and protected the traditional knowledge and practices of Indigenous Peoples, Local Communities, Afro-descendant Peoples or equivalent, including those of uncontacted peoples and transhumant communities, in the design and implementation of REDD+ activities.

Theme 3.3- Outcome Indicator: Public institutions have respected, protected and fulfilled the rights of Indigenous Peoples, Local Communities and Afro-descendant Peoples, or equivalent, including uncontacted peoples and transhumant communities in the design and

Overlap: All of BCB's Theme 3 indicators (3-1 through 3-4, plus optional 3-5 to 3-8) focus on recognizing and strengthening IPLCs' land and resource rights, which is fundamentally aligned with Cancun Safeguards C (rights of Indigenous Peoples and local communities) and B (good governance). Under TREES 3.0, upholding land tenure rights is a non-negotiable baseline jurisdictions must demonstrate that REDD+ implementation does not undermine rights and in fact respects existing tenure. For example, TREES Safeguard requirements (operationalized in theme 2.3) require that public institutions have "recognized, inventoried, mapped, and secured customary and statutory land and resource tenure rights" relevant to REDD+, and that stakeholders have "access to, use of, and control over land and resources" during REDD+ implementation. Furthermore, TREES stipulates that no REDD+ activities cause involuntary resettlement of IPLCs without Free, Prior, Informed Consent (FPIC). Safeguard C outcome indicators also require that Indigenous peoples' rights are "respected, protected and fulfilled" in the design and execution of REDD+ actions. In essence, TREES demands that a jurisdiction already has appropriate legal frameworks and measures in place to respect and secure IPLC land rights before it can receive credits. BCB's Theme 3 overlaps with these requirements by making those same conditions explicit: e.g. Indicator 3-1 expects progress in legal recognition of IPLC land ownership, Indicator 3-4 expects guarantees for IPLC rights to manage and use forests, etc.

activities) or indirectly (funding or other impacts resulting from the REDD+ program) strengthened the regulatory framework and/or its implementation to guarantee the right of IPLCs to the sustainable management and use of the forests in their territories

Optional Indicators 3-5 to 3-8: Various additional measures to improve the regulatory framework for IPLC rights(e.g. policy development, enforcement against illegal activities, etc.).

implementation of REDD+ activities and REDD+ benefit distribution.

Theme 4.1.- Outcome Indicator: Public institutions have respected, protected and fulfilled the right of all relevant stakeholders, including women, youth and vulnerable groups, to participate fully and effectively in the design and implementation of REDD+ activities and decisions about the distribution of REDD+ benefits.

Theme 4.2.- Outcome Indicator: Public institutions have guaranteed that the participation of Indigenous
Peoples, Local Communities, Afrodescendant Peoples or equivalent in the design and implementation of REDD+ activities as well as in the decisions about the distribution of REDD+ benefits occurred through their respective decisionmaking structures and processes, ensuring adequate conditions for their participation and using culturally appropriate procedures.

Theme 5.3- Outcome Indicator: Public institutions have designed and implemented the REDD+ activities and the distribution of REDD+ benefits to enhance social benefits and ensure that women, youth and vulnerable groups also

These are not optional co-benefits but prerequisites to comply with Safeguard C. BCB is thus reiterating the safeguard principle that REDD+ programs must not proceed at the expense of indigenous land tenure – halting land grabs, formalizing customary lands, and ensuring community forest management rights are all inherently required for TREES compliance.

Extension: BCB pushes the frontier by requiring proactive advancement of IPLC rights. Indicator 3-2 prompts removal of barriers and legal reforms to improve women's equitable access to land contributing to the resolution of territorial conflicts, addressing a key implementation gap.

Optional indicators go beyond legal recognition by requiring support for community-led land use planning and natural resource governance, expanding the scope from land tenure to territorial sovereignty and self-determination. TREES does not reference Indigenous life plans, territorial management instruments, or equivalent community-led planning frameworks. BCB explicitly includes them, reinforcing self-governance and local development priorities.

Social-Cultural - Theme 4: Recognition and Recovery of Ancestral Knowledge and Cultural Identity Mandatory Indicator 4-1: The REDD+ program has incorporated the knowledge and communities about biodiversity (genes, species, and ecosystems) as well as about its use, management, and conservation. Mandatory Indicator 4-2: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) strengthened biodiverse and sustainable ancestral or traditional land use systems (agricultural, agroforestry, forestry, etc.) of IPLCs. Optional Indicator 4-4: The REDD+ program implements measures to protect, respect, recover, strengthen, and adapt according to community decisions the cultural identity and knowledge systems of IPLCs. Optional Indicator 4-5: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to the transmission of cultural identity and ancestral knowledge to the youth and children of the IPLCs through mechanisms led by IPLCs themselves.	protected the traditional knowledge and practices of Indigenous Peoples, Local Communities, Afro-descendant Peoples or equivalent, including those of uncontacted peoples and transhumant communities, in the design and implementation of REDD+ activities. THEME 3.3: Outcome Indicator: Public institutions have respected, protected and fulfilled the rights of Indigenous Peoples, Local Communities and Afro-descendant Peoples, or equivalent, including uncontacted peoples and transhumant communities in the design and implementation of REDD+ activities and REDD+ benefit distribution.	Overlap: BCB's Theme 4 (Indicators 4-1, 4-2, and optional 4-4, 4-5) addresses the integration of traditional knowledge and the protection of cultural heritage of IPLCs. This directly corresponds to Cancun Safeguard C's stipulation that REDD+ actions respect and protect indigenous and community knowledge. TREES 3.0 includes an outcome indicator (Safeguard C, theme 3.2) requiring that "public institutions have respected and protected the traditional knowledge and practices of Indigenous Peoples and Local Communities in the design and implementation of REDD+ activities.". In other words, a TREES-compliant program must ensure that it does not undermine or ignore the knowledge systems of IPLCs – it must acknowledge and safeguard them during planning and execution. BCB's indicators overlap by requiring, for example, that REDD+ programs incorporate IPLC biodiversity knowledge (Indicator 4-1) and strengthen sustainable traditional land-use systems (Indicator 4-2). Ensuring that ancestral knowledge is respected in practice is thus an area of clear overlap: BCB is reiterating an existing safeguard obligation to not erode or disrespect cultural knowledge and practices in the course of REDD+ implementation. Extension: BCB extends beyond TREES by encouraging active revitalization and use of
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ancestral knowledge, rather than just recognition and protection. Indicator 4-3 promotes youth involvement in knowledge transmission, expanding beyond typical REDD+ inclusion practices to encompass cultural continuity and future resilience which are topics absent in TREES. BCB's optional indicators (e.g. 4-4 and 4-5) explicitly incentivize positive cultural outcomes and treats cultural heritage as a cobenefit: supporting community-led efforts to recover and strengthen cultural identity, adapt traditional practices to contemporary needs, and transmit knowledge to the next generation. For example, a jurisdiction might earn BCB credit for helping establish cultural education programs, or for using traditional forest management techniques in its REDD+ strategy. These go well beyond what TREES explicitly demands. As noted in the mapping, TREES doesn't explicitly require a REDD+ program to "revive cultural practices" or invest in cultural continuity. BCB treats such actions as valuable co-benefits that should be achieved and verified. This is a nuanced but important extension: where TREES says, "respect indigenous knowledge," BCB adds "and wherever possible, uplift and integrate that knowledge." It shifts the focus from passive protection to active promotion of cultural heritage as part of climate action. In doing so, BCB introduces a paradigm shift in how REDD+ programs engage with culture: from minimizing harm to actively revitalizing, promoting and embedding Indigenous knowledge systems within REDD+ strategies. It also establishes cultural

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Mandatory Indicator 5-1: The REDD+
program has either directly (REDD+ planned
activities) or indirectly (funding or other
impacts resulting from the REDD+ program)
contributed to generating strategic agreements
for territorial governance (including on
territorial policies, joint actions, destination
and use of REDD+ or other resources in the
territory, social investments, co-management
of Natural Protected Areas, protection of sites
and natural resources, etc.) between IPLCs,
governments, and other stakeholders through
effective participation processes.

Mandatory Indicator 5-2: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to the implementation of measures to facilitate and increase the participation of women and youths in decision-making spaces related to forests and territories (at the community, local and national level).

Mandatory Indicator 5-3: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) Theme 3.3: Outcome Indicator: Public institutions have respected, protected and fulfilled the rights of Indigenous Peoples, Local Communities and Afro-descendant Peoples, or equivalent, including uncontacted peoples and transhumant communities in the design and implementation of REDD+ activities and REDD+ benefit distribution.

Theme 4.2: Outcome Indicator: Public institutions have guaranteed that the participation of Indigenous Peoples, Local Communities, Afro-descendant Peoples or equivalent in the design and implementation of REDD+ activities as well as in the decisions about the distribution of REDD+ benefits occurred through their respective decision-making structures and processes, ensuring adequate conditions for their participation and using culturally appropriate procedures.

Theme 2.4: Outcome Indicator: Public institutions have resolved disputes and competing claims and provided effective recourse and remedies through non-cost

identity as a measurable program outcome adding a new performance metric (cultural vitality) to the safeguards framework, whereas TREES leaves cultural considerations at the level of qualitative respect.

Overlap: BCB's Theme 5 (Indicators 5-1, 5-2, 5-3 and optional 5-7, 5-8) emphasizes collaborative governance of territories and the safety of participants. This includes creating joint IPLCgovernment agreements on territorial management, increasing women's and youth's participation in decision-making, strengthening dialogue platforms, and protecting environmental defenders. While Cancun Safeguards do not explicitly mention "environmental defenders," these BCB requirements largely reinforce Safeguards C, D, and even B. For example, Safeguard D requires full and effective participation of stakeholders, which implicitly means that stakeholders must be able to participate free from coercion or fear. Indeed, TREES includes an indicator (theme 2.4) that any grievances or disputes related to REDD+ are resolved with effective recourse and remedy – a REDD+ program tolerating threats or violence against community members would plainly violate the requirement that rights (i.e. rights to life, physical integrity, free speech) are respected and grievances addressed. In the same vein, if IPLC representatives or activists are being threatened, then full, genuine participation (Safeguard D) is not being achieved, since participation cannot occur if people face violence or intimidation; a safe enabling environment is a precondition.

contributed to strengthening and/or creating platforms for dialogue and territorial governance between IPLCs and governments.

Optional Indicator 5-7: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to implement strategies and effective measures to protect IPLC environmental defenders.

Optional Indicator 5-8: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to strengthen and implement the schemes, mechanisms, principles, or proposals that IPLCs have previously built related to REDD+ (such as REDD+ Indígena Amazónico or others) prohibitive and non-discriminatory mechanisms when there was a violation of rights, grievance, dispute or claim related to the implementation of REDD+ activities.

Additionally, Safeguard B (transparent and effective governance) calls for rule of law and accountability in how REDD+ is implemented. Ensuring that community leaders and participants are protected from violence and that decisions are reached through consensus, not fear, aligns with strong governance principles of transparency and rule of law. Thus, many of the measures in BCB Theme 5 – such as safeguarding IPLC leaders (defenders) or formalizing equitable decisionmaking platforms – overlap with underlying TREES safeguards. They spell out conditions that are implicitly necessary to meet TREES: a program cannot claim to respect rights (Safeguard C) or ensure effective participation (Safeguard D) if community members are being repressed or excluded. In summary, BCB's territorial governance requirements reinforce what TREES already expects (even if TREES doesn't state it explicitly): that REDD+ programs operate in an environment of trust, safety, and inclusion.

Extension: The BCB standard adds new specific obligations. Mandatory Indicator 5-2 recognizes the role of community-based enforcement such as forest patrols or customary sanctions in protecting territories. TREES do not require such operational mechanisms, even though they are key to territorial integrity. Notably, BCB references international agreements like the Escazú Agreement and requires jurisdictions to implement "concrete measures to safeguard environmental defenders". TREES 3.0 does not

Biodiversity – Outcome 1: Identify key biodiversity areas (KBA) and other areas of global and regional biodiversity significance	Indicator 1-1: KBAs and other areas significant for global and/or regional biodiversity conservation within the TREES accounting area are defined and identified	Theme 5.1: Structure and Process Indicator: Participants have in place a legal framework, policies or programs as well as the necessary procedures and resources to define the term natural forests and other natural ecosystems, distinguishing them from plantations, map the spatial distribution of natural forests and other natural ecosystems, and prevent REDD+ activities from resulting in the conversion of natural forests and other natural ecosystems. Outcome Indicator: Public institutions have designed and implemented REDD+ activities without the conversion of natural	explicitly mention environmental defenders or require adherence to Escazú – it remains at the level of general principles. By introducing explicit defender protections and tying them to certification, BCB adds a new layer of accountability for human rights protection in climate action. For example, under BCB a jurisdiction might need to show it has enacted policies or emergency protocols to protect community members who speak up, or that it legally recognizes the rights of IPLCs to manage resources without outside intimidation (optional Indicator 5-8 on supporting IPLC-led proposals hints at this empowerment). These are value-add elements of BCB – they go beyond TREES by explicitly incentivizing the protection of civic space and community leadership within REDD+. Overlap: BCB's Biodiversity Outcome 1 (Indicator 1-1) requires the jurisdiction to define and identify all Key Biodiversity Areas and other globally or regionally important biodiversity sites within the TREES accounting area. This step is essentially foundational to Safeguard E (the Cancun safeguard on natural forests and biodiversity). TREES 3.0 Safeguard E, as operationalized in theme 5.1, explicitly requires that Participants have the capacity to "define the term natural forests and other natural ecosystems, distinguish them from plantations, map their spatial distribution, and prevent REDD+ activities from converting them." In practice, a jurisdiction cannot meet the requirement of "no conversion of natural forests" without first knowing where those natural forests and high-
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forests and other natural ecosystems to plantations or other land uses.

Theme 1.1: Outcome Indicator: Public institutions have designed and implemented REDD+ activities consistent with or complementary to the objectives of the national and if applicable, subnational, forest policies/programs.

Theme 1.2: Outcome Indicator: Public institutions have designed and implemented REDD+ activities consistent with or complementary to the objectives of identified, ratified and relevant international conventions and agreements.

value ecosystems are. Identifying important biodiversity areas is therefore an implicit prerequisite of complying with Safeguard E – you can't protect what you haven't identified. Many national REDD+ readiness strategies recognized this by including maps of high conservation value forests. In addition, Safeguard A (consistency with national forest programs and international conventions) often entails countries mapping and prioritizing critical biodiversity areas to meet their conservation commitments. Thus, BCB's requirement to catalogue KBAs and critical habitats overlaps with existing TREES safeguard duties: it's effectively detailing a task (biodiversity mapping) that TREES expects to be done as part of ensuring no harm to forests and biodiversity.

Extension: Under TREES, as long as no natural forests are converted and biodiversity isn't harmed, the exact process of identification isn't closely scrutinized. BCB, however, standardizes this process: jurisdictions must periodically (annually, per BCB guidance) update their inventory of KBAs and important biodiversity areas, and they are encouraged to use globally recognized criteria (e.g. KBA standards) and involve IPLCs in this work. The outcome is also of a higher rigor: jurisdictions are not just avoiding destroying biodiversity, they are expected to know exactly where the biodiversity is and publicly document it. By aligning with global KBA methodologies and requiring community engagement in identifying conservation priorities, BCB ensures that biodiversity

			protection under REDD+ is more systematic and participatory. It creates a foundation for future enhancement or restoration, not just protection. In summary, TREES Safeguard E asks countries to protect biodiversity; BCB ensures they proactively map and prioritize biodiversity – a significant extension that improves clarity and accountability in how the safeguard is implemented.
Biodiversity - Outcome 2: Protect and/or enhance the biodiversity value of the areas identified in Indicator 1-1	Indicator 2-1: The REDD+ program directly or indirectly leads to ecological restoration or improved management that conserves, and if possible, improves, the important biodiversity values of the TREES accounting area. Indicator 2-2: The REDD+ program directly or indirectly establishes and/or protects sites that are large enough and/or ecologically connected enough to conserve the biodiversity values in the long term. Indicator 2-3: The REDD+ program directly includes or incentivizes sustainable forest management (SFM) practices which are biodiversity friendly. (This is a mandatory parameter only if sustainable forest management is part of the REDD+ Program)	Theme 5.1: Outcome Indicator: Public institutions have designed and implemented REDD+ activities without the conversion of natural forests and other natural ecosystems to plantations or other land uses. Theme 5.2: Outcome Indicator: Public institutions have designed and implemented the REDD+ activities without adverse impacts on natural forest areas and natural ecosystems, biodiversity, and ecosystem services and enhancing their environmental benefits.	Overlap: BCB's Outcome 2 indicators (2-1, 2-2, 2-3) require that the REDD+ program lead to tangible conservation actions: ecological restoration or improved management that conserves/improves biodiversity (2-1), establishment or protection of sufficiently large/connected sites (2-2), and adoption of biodiversity-friendly sustainable forest management (2-3, mandatory if SFM is part of the program). These requirements overlap with the core intent of Safeguard E, which is to ensure that REDD+ activities conserve natural forests and biodiversity. Under TREES, no credits can be issued for activities that harm natural forests or biological diversity. In fact, the Cancun Safeguard E language (which TREES adheres to) explicitly states that REDD+ actions should "not be used for the conversion of natural forests, but instead to incentivize the protection and conservation of natural forestsand to enhanceenvironmental benefits.". This means a TREES jurisdiction is already obliged to protect existing forests and ideally improve environmental benefits as part of its REDD+ strategy. BCB's indicators 2-1 and 2-2 essentially

			restate this obligation: ensure that the program is conserving (and if possible, improving) the key biodiversity values in the area – in other words, prevent deforestation/degradation in those high-value areas and work to strengthen their integrity. Likewise, practicing sustainable forest management (BCB 2-3) is not introducing a new concept; any credible REDD+ program under TREES would be expected to manage forests sustainably (avoiding overharvesting, destructive logging, etc.) as part of "do no harm." In summary, BCB Outcome 2 overlaps with Safeguard E by pursuing the same fundamental goal: conserve natural forests and biodiversity. It frames that goal as a co-benefit to report, whereas TREES frames it as a condition of issuance – but substantively, they overlap. The jurisdiction must show it is not converting natural forests and is maintaining/enhancing environmental benefits, which is exactly what Safeguard E requires. Extension: BCB Outcome 2 incentivizes jurisdictions to achieve measurable positive outcomes for biodiversity. In practical terms, this means BCB turns Safeguard E into a performance metric: it's not enough that no biodiversity was lost – there should be evidence of net positive
			conservation outcomes.
Biodiversity – Outcome 3: Incentivize activities or conditions that	Indicator 3-1: The REDD+ program directly or indirectly includes activities or programs to prevent over-exploitation of biodiversity resources.	Theme 5.1: Outcome Indicator: Public institutions have designed and implemented REDD+ activities without the conversion of natural forests and other	Overlap: BCB's Outcome 3 (Indicators 3-1, 3-2, 3-3) addresses specific risk-mitigation measures: preventing over-exploitation of biodiversity resources and managing the use or spread of invasive alien species. These indicators correspond closely to the "do no harm" aspects of

minimize the risk of harming biodiversity value of the areas identified in Indicator 1-1 **Indicator 3-2:** The REDD+ program directly or indirectly includes a management plan or program to:

- Prevent the use of invasive alien species in REDD+ program activities
- Aim to minimize the use of any alien species in REDD+ program activities. This should be limited to specific circumstances and include a risk analysis of the use of any non-native species following IUCN invasive species standards.

Indicator 3-3: The REDD+ program directly or indirectly includes a management plan or program to mitigate the impact of invasive alien species found in areas identified in Indicator 1-1.

natural ecosystems to plantations or other land uses.

Theme 5.2: Outcome Indicator: Public institutions have designed and implemented the REDD+ activities without adverse impacts on natural forest areas and natural ecosystems, biodiversity, and ecosystem services and enhancing their environmental benefits.

TREES Safeguard E. TREES requires that REDD+ activities be implemented "without adverse impacts on... biodiversity, and ecosystem services" – a broad mandate that certainly includes avoiding practices that would overharvest wildlife or timber and avoiding introducing invasive species that could damage ecosystems. In many countries, national-level forestry or biodiversity policies (aligned with Safeguard E) already prohibit the use of known invasive species in reforestation or enrichment planting, and promote sustainable harvest levels for forest products. Thus, what BCB Outcome 3 demands – e.g. having a plan to not use invasives and to mitigate any existing invasive species, and ensuring sustainable use of biodiversity – is essentially standard good practice under the environmental safeguards. Any REDD+ program following Safeguard E should already be doing this. If a jurisdiction were, say, introducing fastgrowing exotic species without risk controls, or allowing unsustainable hunting/logging in REDD+ areas, it would likely be non-compliant with TREES' environmental integrity requirements. In short, BCB's antioverexploitation and anti-invasive measures overlap entirely with basic TREES criteria: they directly correspond to the "avoid adverse impacts" rule under Safeguard E. These are not new requirements so much as a more detailed restatement of what "no adverse impacts on biodiversity" entails.

			Extension: BCB's addition here is to incentivize jurisdictions to achieve measurable positive outcomes, which nonetheless overlaps with the requirements of Safeguard E implementation. It requires evidence (such as enforcement records, plans, or monitoring outcomes) that these issues are being managed. While this doesn't introduce a brand-new concept (since TREES already forbids harming biodiversity), it reinforces how jurisdictions must prove and quantify how they are doing meeting this safeguard. Therefore, while Outcome 3 mostly reiterates TREES obligations (overlap), it extends them in the sense of demanding stronger documentation and active management.
Biodiversity - Outcome 4: Incentivize creation and maintenance of a biodiversity governance mechanism(s)	Indicator 4-1: The REDD+ program has directly or indirectly resulted in a biodiversity governance mechanism that results in the long-term conservation of the identified key biodiversity areas from Parameter 1-1. Indicator 4-2: The REDD+ program has resulted in or supports a biodiversity governance mechanism(s) that is designed, implemented, and monitored in a participatory process, inclusive of Indigenous Peoples and Local Communities.	Theme 1.1: Outcome Indicator: Public institutions have designed and implemented REDD+ activities consistent with or complementary to the objectives of the national and if applicable, subnational, forest policies/programs. Theme 1.2: Outcome Indicator: Public institutions have designed and implemented REDD+ activities consistent with or complementary to the objectives of identified, ratified and relevant international conventions and agreements. Theme 4.2: Outcome Indicator: Public institutions have guaranteed that the participation of Indigenous Peoples, Local	Overlap: BCB's Outcome 4 (Indicators 4-1 and 4-2) is about establishing or supporting biodiversity governance mechanisms – for example, multi-stakeholder committees, trusts, or other institutions that ensure long-term conservation of the identified biodiversity areas, with participation of IPLCs. Cancun Safeguards do not explicitly demand the creation of new governance bodies for biodiversity, so there isn't a one-to-one requirement in TREES for this. However, this outcome draws on general safeguard principles. Safeguard A calls for consistency with national policy frameworks and international agreements – implicitly, having appropriate institutions and arrangements in place to manage REDD+ and its co-benefits is part of that alignment. Safeguard D emphasizes inclusive stakeholder participation in REDD+

Communities, Afro-descendant Peoples or equivalent in the design and implementation of REDD+ activities as well as in the decisions about the distribution of REDD+ benefits occurred through their respective decision-making structures and processes, ensuring adequate conditions for their participation and using culturally appropriate procedures.

implementation; a participatory biodiversity governance mechanism (like a committee involving indigenous representatives) is essentially an embodiment of that principle. In TREES, a jurisdiction isn't required to form a new committee, but it is required to involve stakeholders in implementation and benefitsharing decisions (as evidenced by outcome indicator 4.2 on IPLC participation structures). Therefore, we can say BCB's emphasis on biodiversity-focused governance reinforces the idea that REDD+ programs should have robust, inclusive institutions. A strong institutional setup for managing biodiversity outcomes is in line with the spirit of Safeguard B (effective governance) and Safeguard D (participation), even if not spelled out in Cancun's and TREES text. In other words, BCB Outcome 4 overlaps with TREES by promoting governance quality and stakeholder engagement, which TREES already expects generally. It's just applying those expectations specifically to the realm of biodiversity cobenefits (e.g. encouraging that there be a dedicated forum or mechanism to oversee biodiversity conservation efforts).

Extension: BCB's addition here is to incentivize jurisdictions to achieve measurable positive outcomes, which nonetheless overlaps with the requirements of Safeguards implementation. BCB leverages Safeguard D (participation) by channelling it into a concrete outcome (a governance body) and leverages Safeguard A (policy alignment) by potentially linking to

			international biodiversity commitments – but the idea of formalizing co-benefit governance is unique to BCB. As a result, jurisdictions aiming for BCB will be induced to set up legacy structures (e.g. committees, funds, policies) that embed biodiversity co-benefits into their governance.
Forest Services	Indicator 1-1: Percentage of riparian areas	Theme 1.1: Outcome Indicator: Public	Overlap: Maintaining water quality is an inherent
Outcome 1: Maintain or Improve Water Quality	in each watershed covered by native forests is maintained or improved. Indicator 1-2: The REDD+ program has resulted directly or indirectly in programs or activities maintaining or improving water quality in watersheds.	institutions have designed and implemented REDD+ activities consistent with or complementary to the objectives of the national and if applicable, subnational, forest policies/programs. Theme 1.2: Outcome Indicator: Public institutions have designed and implemented REDD+ activities consistent with or complementary to the objectives of identified, ratified and relevant international conventions and agreements. Theme 5.2: Outcome Indicator: Public institutions have designed and implemented the REDD+ activities without adverse impacts on natural forest areas and natural ecosystems, biodiversity, and ecosystem services and	co-benefit of forest conservation – one that TREES 3.0 safeguards already implicitly address. Under TREES Safeguard E (Theme 5.2), jurisdictions must implement REDD+ activities "without adverse impacts onecosystem services", which encompasses services like water regulation. In other words, if a REDD+ program were to degrade water quality (e.g. increased sedimentation or pollution due to project activities), it would conflict with the environmental safeguards in TREES. Safeguard A (alignment with national forest program objectives and relevant international agreements) further reinforces this by requiring consistency with policies that often include water resource protection goals. Many national REDD+ strategies emphasize watershed security and clean water as co-benefits, so ensuring REDD+ actions do not harm – and ideally enhance – water quality aligns with these baseline safeguard expectations.
		enhancing their environmental benefits.	Extension: BCB's addition here is to incentivize jurisdictions to achieve measurable positive outcomes, which nonetheless overlaps with the requirements of Safeguards implementation. The BCB Forest Services module makes water quality

Outcome 2 : Maintain or	Indicator 2-1: Percentage of areas with	Theme 1.1: Outcome Indicator: Public institutions have designed and	an explicit performance metric. Indicator 1-1 requires jurisdictions to monitor and maintain (or increase) the percentage of native forest cover along riparian areas in each watershed. Likewise, Indicator 1-2 demands evidence that the REDD+ program has directly or indirectly led to programs improving water quality in those watersheds. These obligations go beyond TREES reporting requirements – TREES does not mandate detailed reporting on water outcomes. Jurisdictions must map watershed forests, track changes in riparian vegetation, and report on water protection initiatives. In doing so, BCB explicitly incentivizes improvements in watershed protection (e.g. reducing runoff and erosion, protecting stream buffers) as part of what it means to excel in REDD+. Overlap: Soil retention – preventing erosion and landslide risk – is another ecosystem service
Improve Soil Retention	greater than 12% slope covered by native forests is maintained or improved. Indicator 2-2: The REDD+ program has resulted directly or indirectly in programs or activities maintaining or improving soil retention.	institutions have designed and implemented REDD+ activities consistent with or complementary to the objectives of the national and if applicable, subnational, forest policies/programs. Theme 1.2: Outcome Indicator: Public institutions have designed and implemented REDD+ activities consistent with or complementary to the objectives of identified, ratified and relevant international conventions and agreements.	naturally supported by intact forests. TREES safeguards already expect that REDD+ activities will not undermine this service. Theme 5.2 of Safeguard E stipulates that REDD+ programs be designed and implemented with no adverse impacts on natural ecosystems or their services. Thus, a REDD+ initiative causing significant soil erosion or degradation would breach the intent of the TREES environmental safeguards. Maintaining soil stability is implicitly required to "enhanceenvironmental benefits" under Safeguard E. Safeguard A similarly plays a role: alignment with national policies and international commitments means countries' REDD+

Theme 5.2: Outcome Indicator: Public
institutions have designed and
implemented the REDD+ activities
without adverse impacts on natural forest
areas and natural ecosystems,
biodiversity, and ecosystem services and
enhancing their environmental benefits.

programs should reflect goals like land degradation neutrality and watershed protection (e.g. many nations have soil conservation targets in forestry or climate plans). In short, the principle of not harming soils is ingrained in the existing safeguards framework, even if TREES doesn't single it out by name.

Extension: BCB's addition here is to incentivize jurisdictions to achieve measurable positive outcomes, which nonetheless overlaps with the requirements of Safeguards implementation. BCB's Soil Retention establishes concrete indicators and targets for soil conservation. Indicator 2-1 requires measuring the proportion of steep lands (>12% slope) under native forest cover and ensuring this percentage is maintained or improved. This means the program must identify all erosion-prone areas in the TREES accounting area and actively track forest cover on them – a level of granular monitoring not demanded by TREES. Indicator 2-2 further calls for evidence of programs or activities that directly address soil retention (e.g. reforestation on steep slopes, anti-erosion measures, sustainable agriculture to reduce soil loss). TREES 3.0 does not require reporting such specific interventions or quantitative outcomes for soil stability. BCB, by contrast, makes prevention of soil erosion a verifiable performance outcome. Jurisdictions are incentivized to invest in erosion control and then document the results (area of vulnerable land kept forested, new soil conservation projects, etc.).

Outcome 2.	Ladicator 2 1. The health of the former	Thomas 1.1. Outcome Indicate - D. I.E.	Overlan. The elimeter regulation function of
Outcome 3: Maintain or	Indicator 3-1: The health of the forests included in the TREFS accounting area is	Theme 1.1: Outcome Indicator: Public institutions have designed and	Overlap: The climate regulation function of forests is at the core of REDD+'s purpose –
Maintain or Improve Climate Regulation	included in the TREES accounting area is maintained or improved	institutions have designed and implemented REDD+ activities consistent with or complementary to the objectives of the national and if applicable, subnational, forest policies/programs. Theme 1.2: Outcome Indicator: Public institutions have designed and implemented REDD+ activities consistent with or complementary to the objectives of identified, ratified and relevant international conventions and agreements. Theme 5.2: Outcome Indicator: Public institutions have designed and implemented the REDD+ activities without adverse impacts on natural forest areas and natural ecosystems, biodiversity, and ecosystem services and enhancing their environmental benefits.	forests is at the core of REDD+'s purpose – primarily through carbon storage, but also via forests' influence on local climate (rainfall, temperature moderation). TREES 3.0 already embodies this outcome in its carbon-centric goals and safeguards. By design, a TREES crediting program must preserve forest carbon stocks (and thus forest health), which inherently means maintaining the forests' capacity to regulate climate. Additionally, Safeguard E (Theme 5.2) covers ecosystem service protection, so REDD+ activities are expected not to diminish climate-regulating services (e.g. they should not worsen local climate extremes or reduce forest cover in a way that affects regional rainfall patterns). If a REDD+ program were to degrade forest cover to the point of impairing these services, it would violate the no-harm mandate for environmental safeguards. Safeguard A bolsters this overlap as well: alignment with national climate change strategies and international agreements (like the Paris Agreement under the UNFCCC) implies that REDD+ programs contribute to broader climate regulation objectives. In sum, keeping forests healthy for climate regulation is an intrinsic expectation under TREES, reflected both in its carbon accounting focus and its safeguard requirements to protect ecosystem benefits. Extension: BCB's addition here is to incentivize
			jurisdictions to achieve measurable positive outcomes, which nonetheless overlaps with the

requirements of Safeguards implementation.
BCB's climate regulation module adds a new layer
of rigor by requiring jurisdictions to explicitly
monitor the health of forest ecosystems beyond
just carbon metrics. Under Indicator 3-1,
Participants must demonstrate that the health of
the forests in the TREES area is maintained or
improved over time. This goes beyond ensuring X
tons of CO ₂ are saved – it calls for defining what a
"healthy forest" means and tracking indicators of
ecosystem vitality. For example, jurisdictions are
encouraged to use metrics like Normalized
Difference Vegetation Index (NDVI), leaf area
index, net primary productivity, or habitat
diversity as measures of forest health. Such
ecological monitoring is not required by TREES
for credit issuance. TREES focuses on carbon
emissions and removals, without an obligation to
report on vegetation index trends or biological
productivity. BCB therefore extends the
performance monitoring to qualitative climate
benefits: it incentivizes maintaining robust,
resilient forests that continue to provide climate
regulation (e.g. cooling, moisture cycling) at
optimum levels.
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III. Safeguard Compliance vs. "Additional Benefits": Analysis of Overlaps and Gaps

By design, ART's BCB certification is voluntary and meant to complement the TREES standard. BCB is not a standalone socio-environmental standard, but rather an optional "add-on" for jurisdictions that are already meeting all TREES requirements. In principle, this means TREES sets the foundation (robust carbon accounting integrity plus adherence to Cancun safeguards), ensuring no harm and basic good practice, while BCB rewards jurisdictions for achieving positive outcomes beyond that baseline. In practice, however, our review finds that some BCB indicators blur the line between baseline safeguard compliance and additional cobenefits.

Our key findings are:

1. Overlap with existing TREES obligations

Many BCB criteria reiterate what TREES 3.0 already obliges participants to do under the Cancun Safeguards. For example, providing benefits to local communities is presented in BCB as an outcome indicator (Social 1-1), but it is also essentially a safeguard requirement – TREES Safeguard C/D/E explicitly include equitable benefit-sharing and meaningful and effective stakeholder participation. Similarly, protecting biodiversity and natural forests (addressed in BCB's Biodiversity module) is not optional at all; it's a condition for issuing any TREES credits. BCB labels these activities as "co-benefits," which could be confusing – they might be seen as additional achievements, whereas failing to do them would actually violate core TREES criteria. In other words, certain BCB indicators amount to additional verification of TREES safeguard compliance rather than showcasing extra benefits. Some examples of potential duplication include:

- <u>Biodiversity "no harm" measures:</u> BCB Biodiversity Outcome 3 (Indicators 3-1, 3-2, 3-3) requires the prevention of over-exploitation of natural resources and control of invasive species. These are essentially "do no harm" measures that any TREES-compliant REDD+ program should already have in place. A jurisdictional program that over-harvests wildlife or introduces invasive species would breach environmental safeguards (Cancun Safeguard E requires protecting natural forests and biodiversity). Here, BCB is essentially double-checking that the program is not causing harm to biodiversity which, while important for integrity, is not a "new" benefit generated by the program but rather the avoidance of a negative outcome.
- Land tenure rights: BCB's social indicators on land and resource tenure (Social Theme 3) ensure that IPLCs have their land claims legally recognized. This overlaps with TREES Safeguard B and C's requirement to respect and secure land tenure rights. If a country hasn't recognized IPLC land rights at all, it's questionable whether they could meet TREES safeguards in the first place in fact, TREES will not issue credits unless ownership or rights to emission reductions are resolved. BCB pushes for measurable progress on tenure (e.g. land titles issued, policies enacted), which is excellent but it's essentially driving home a point that could be seen as a precondition to any ethical REDD+ implementation rather than an "extra" benefit. This is especially emphasized by ART's own TREES guidance (see here) which requires jurisdictions to not only respect and protect, but also "fulfil" IPLC rights, requiring the participant to "demonstrate that stakeholders had access to, use of and control over land and resources in line with their rights."
- <u>Community participation and FPIC</u>: Free, prior, and informed consent (FPIC) and effective
 participation of communities are fundamental safeguard requirements under TREES (Safeguards, B,
 C and D). In fact TREES already mandates inclusive, culturally appropriate decision-making

processes. Thus, a BCB indicator on FPIC or participation would largely be re-affirming an existing TREES obligation.

"No harm" vs. "Positive benefit"

The Cancun Safeguards in TREES may prioritise preventing harm, but they are also about doing good and ensuring minimum good practices – e.g., do not convert natural forests, respect rights, involve stakeholders, prevent corruption, etc. They encourage the enhancement of benefits where appropriate (Safeguard E), and ensure at least a floor of minimum standards. BCB calls on proponents to do much more. It aspires to encourage additional positive outcomes – for example, increases in community well-being, improved ecosystem services, or strengthening of IPLC governance mechanisms. **Our analysis finds that while most BCB indicators align with the goal of capturing net positive outcomes, many nonetheless overlap with existing safeguard implementation requirements.** For instance:

- Community benefits distribution: If a jurisdiction implements a REDD+ program and no communities receive any type of benefits, they will likely fail TREES safeguard requirements (which demand equitable distribution of REDD+ benefits). Therefore, BCB's Social Indicator 1-1, which expects IPLCs to receive benefits from the program, is not really "above and beyond" it's an expectation of any acceptable program and certainly a requirement of TREES.
- Capacity building for IPLCs: BCB Indicator 2-1 rewards programs for strengthening the knowledge and capacities of IPLCs (through training on rights, carbon, monitoring, etc.). TREES doesn't explicitly require holding workshops or training, but it does require effective participation of IPLCs at all stages. In practice, providing capacity building is a means to achieve that safeguard outcome of informed, meaningful participation. Here, BCB is essentially making an implicit safeguard activity explicit by counting training and capacity efforts as deliverables. This is valuable in showcasing effort, but one could argue it's not a wholly new "co-benefit" so much as documentation of what should be happening anyway to meet participation safeguards under TREES.

3. Risk of confusion

Without clear differentiation, jurisdictions may be uncertain whether certain BCB actions are voluntary enhancements or effectively required practices under TREES. They may also question whether an obligation presented in BCB is, in fact, a TREES requirement—or mistakenly assume that compliance is optional unless they choose to pursue BCB certification. For example, BCB asks for a benefit-sharing mechanism that is culturally appropriate and accessible (Social Indicator 1-2). A reasonable question from a participant might be: "Would ART/TREES issue any credits if my benefit-sharing mechanism were inappropriate or non-existent?" (Likely not, since TREES safeguards participatory and transparent benefit-sharing processes). The current BCB standard text doesn't always clarify this context. This could lead to redundant reporting (jurisdictions providing the same information in their TREES Monitoring Reports and in BCB reports) and uncertainty over what is required under TREES first as a condition to then pursue a BCB certification, or truly "additional" under BCB? It blurs the line between compliance and additional achievements, potentially diminishing the perceived value of BCB if participants feel they are being rewarded for things that are already mandatory. It also blurs the line between a jurisdiction's obligations under TREES to demonstrate not just structural and process indicators, but true "outcomes" (i.e. not just respect and protection of rights, but fulfilment of rights of IPLCs). The last thing drafters of the BCB wanted was for the pursuit and reporting of beyond carbon benefits to be confused with the TREES requirement to evidence "outcomes".

4. On the other hand, we identified many areas where BCB clearly goes beyond TREES requirements and drives new benefits:

- Quantitative benefit-sharing outcomes: TREES requires that benefits be shared fairly and equitably, but BCB incentivizes going further by measuring and verifying how much benefits reach communities and vulnerable groups. For instance, BCB might require reporting what percentage of REDD+ revenues go to IPLCs, or evidence of community projects funded, while TREES might require evidence that a benefit sharing arrangement was reached through a transparent, fair, and inclusive process. This pushes jurisdictions toward more transparent and equitable benefit distribution (and provides recognition for those that deliver a larger share of benefits to local stakeholders).
- <u>Biodiversity enhancement:</u> Under TREES, REDD+ programs must avoid harming biodiversity (no loss of natural forest or ecological values), but BCB goes a step further by rewarding actual improvements in ecosystems. For example, a jurisdiction could earn BCB credit for restoration of degraded areas, or recovery of endangered species populations as a result of program activities. This shifts the focus from just "no net loss" to net positive gains for nature. It realizes the co-benefit ambition of REDD+ by turning general goals of biodiversity conservation into specific, measured outcomes (e.g. hectares of habitat restored, wildlife monitoring data showing population increases).
- <u>Cultural heritage and traditional knowledge</u>: TREES is essentially silent on proactively promoting cultural heritage, beyond the requirement to respect indigenous and local knowledge. BCB, however, actively encourages jurisdictions to support cultural resurgence for instance, by integrating traditional knowledge into forest management or funding cultural education programs. These actions broaden the scope of "benefits" to include promoting cultural well-being, something not captured in TREES compliance checklists. It acknowledges and rewards the preservation and strengthening of IPLCs' cultural identity as an outcome of climate action.

In summary, there is a **conceptual tension in BCB between acting as an additional verifier of safeguard performance and as a recognition of additional achievements**. Ideally, BCB should only focus on the latter, since the former should already be ensured by TREES. In the following section, we offer a way forward to reinforce BCB's aim to recognize the beyond carbon co-benefits.

IV. Proposed Amendments and Clarifications to BCB Text

To address the overlaps and potential confusion noted above, we propose a set of **textual amendments or annotations** to the BCB standard. These suggestions aim to **clarify the intent** (distinguishing safeguard basics from true co-benefits), eliminate or modify language to ensure against duplication of TREES requirements, and strengthen the focus on *additionality of benefits*. All proposed amendments to the BCB standard explicitly refocus each indicator on enhancement outcomes that go above and beyond TREES safeguard obligations. Any wording that previously implied re-checking a safeguard compliance item under TREES has been revised or removed.

Each suggestion is presented below as a comparison of the current draft wording and a proposed edit or addition.

Note 1: In the interest of brevity and clarity, our proposed edits to BCB indicator language do not repeat the standard phrasing: "The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program)..." This omission is purely stylistic and does not reflect a recommendation to remove or revise this language in the final standard. We fully acknowledge its relevance for maintaining flexibility in how jurisdictions demonstrate results. Where this framing is critical for interpretation or scope, we assume it will remain as part of the final indicator language.

Note 2: The proposed edits are examples to illustrate the changes needed. We focused on areas flagged as redundant or ambiguous in our analysis. The suggested edits aim to maintain all substantive requirements of BCB while making the distinction between baseline safeguard compliance and additional achievement more explicit.

Current BCB Text (Excerpt)	Proposed Edit / Rationale
BCB Introduction (pg. 3): "This Certification	Add clarification: "BCB builds upon and reinforces
also reinforces the Cancun Safeguards by	the Cancun safeguard requirements as operationalized
recognizing and verifying social, cultural, and	in the TREES Standard. It focuses on documenting
environmental outcomes that go beyond	additional positive outcomes beyond those obligations
emission reductions and removals."	required by TREES. Participants should note that BCB indicators complement (and do not replace) the need to
	comply with all TREES safeguards."
	Rationale: This added language explicitly distinguishes BCB's scope as beginning where TREES requirements end. It guides users that BCB is not rechecking TREES safeguard compliance, but intending to showcase positive outcomes that go beyond mandatory baseline safeguard duties remaining under TREES. This clarification will reduce confusion by clearly positioning BCB as an add-on for extra achievements.
Socio-Cultural Module-Theme 1. Sustainable	Revised wording: "The REDD+ program
Indigenous and Community Economy	demonstrates that IPLCs have directly received
	monetary and/or non-monetary benefits and benefited
	through the REDD+ benefit-sharing mechanisms, in

Mandatory Indicator 1-1: IPLCs have directly received (or are going to receive according to the agreements reached between the Participant and the IPLCs) funds, carbon credits and/or other non-monetary benefits from the REDD+ Program's benefit sharing, e.g. investments in community infrastructure such as water, drainage, wastewater treatment, education, roads, protection of sacred or spiritually valuable sites, health benefits, etc.

accordance with agreements reached between the Participant and IPLCs. These benefits must be culturally appropriate, documented with transparent, disaggregated data showing how benefits flow to women, youth, and vulnerable groups and should reflect actual disbursement or delivery by the time of BCB verification. The indicator documents the scale, diversity, and impact of benefits beyond those required for TREES safeguard compliance. Where benefits are ongoing or phased, jurisdictions must provide evidence of delivery timelines, mechanisms in operation, and implementation progress."

Rationale: This indicator no longer re-verifies that a benefit-sharing mechanism exists (already required under TREES Safeguards B, C, D, and E). It instead verifies quantified benefit delivery outcomes and enhanced targeting of benefits. It clarifies that agreements alone are not sufficient, there must be proof of delivery or functioning systems.

Revised wording: "The REDD+ program has contributed to the establishment and active operation of benefit-sharing mechanisms that are agreed with IPLCs and demonstrably functional. These IPLC-designed or co-developed funding channels must improve accessibility, cultural appropriateness, and transparency of REDD+ benefit delivery. These mechanisms demonstrate enhancements beyond the safeguards minimum, such as digital tools for tracking transfers or adaptations of traditional governance for financial management."

Rationale: TREES already requires inclusive and appropriate mechanisms, and TREES 3.0 requires a description of the arrangement and its conformance with the Cancun Safeguards. This BCB indicator now captures jurisdictional innovations or enhancements (e.g. platform design, accessibility, disaggregation) that go beyond that baseline. It requires evidence of actual function, not just process or intent.

Revised wording: "The REDD+ program provides demonstrable allocation of financial and/or in-kind resources to support the implementation of actions identified in IPLC territorial management instruments (e.g. life plans, REDD+ Indígena Amazónico frameworks), which have been developed and prioritized through inclusive community processes. Jurisdictions must provide evidence of alignment between REDD+ investments and IPLC-defined priorities, demonstrating not just consultation but effective participation of community members and inclusive planning structures."

Socio-Cultural Module-Theme 1. Sustainable Indigenous and Community Economy

Mandatory Indicator 1-2: The REDD+ program contributes to establishing and operating mechanisms agreed with the IPLCs for channelling funds that are accessible, culturally appropriate, and without excessive requirements for the communities

Socio-Cultural Module- Theme 1. Sustainable Indigenous and Community Economy

Mandatory Indicator 1-3: "The REDD+ program contributes to financing the actions planned, prioritized, and decided in the territorial management instruments (life plans, strategic plans, territorial management plans, etc.) of IPLCs and ensures effective participation of community members, including women and youth, in these"

Socio-Cultural Module-Theme 1. Sustainable Indigenous and Community Economy

Optional Indicator 1-4: Revenues derived from REDD+ program strengthen pre-existing sustainable enterprises and/or promote new sustainable enterprises in local or Indigenous communities where the REDD+ Program is implemented

Theme 2. Enabling Conditions and Capacity Building

Mandatory Indicator 2-1: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to strengthening the knowledge and capacities of IPLC and their representative institutions, including on:

- Rights and safeguards under REDD+
- REDD+, carbon market and options for participation of IPs and LCs in REDD+
- Ecosystem services
- Monitoring, Reporting, and Verification (MRV) Tools for REDD+

Rationale: Participation and recognition of IPLC plans are required under TREES Safeguards D and C. What is additional here is financing those plans and tracking outcomes tied to community development priorities. It ensures this indicator goes beyond TREES safeguards, which require consultation but not necessarily the funding of indigenous life plans.

Revised wording: "The REDD+ program channels revenues toward the growth of IPLC-led or community-based sustainable enterprises – either by scaling existing initiatives or incubating new ventures that generate local livelihoods or ecosystem service cobenefits. Verification includes economic indicators (e.g. jobs created, income generated) and links to IPLC governance structures.

The REDD+ program supports the development or strengthening of sustainable enterprises that are locally owned or co-managed by IPLCs, including through direct investment of REDD+ revenues, technical assistance, or market-based mechanisms. These enterprises may include pre-existing initiatives or new ventures aligned with community priorities. Jurisdictions must provide evidence of benefit-sharing arrangements, and how IPLC participation (including women and youth) is embedded in enterprise governance or employment."

Rationale: There is no TREES safeguard that mandates the promotion of enterprise development. This indicator is entirely value-added and clearly distinguished as a co-benefit beyond carbon and safeguards. Introduces ownership and governance dimensions and recognizes non-financial forms of support.

Revised wording: "The REDD+ program has implemented targeted capacity-building programs that went beyond ensuring informed participation of IPLC, but also has demonstrably strengthen the ability of IPLCs and their representative institutions to engage in all facets and stages of REDD+ – with verifiable outcomes (e.g. number of trained IPLC members, community-led trainings delivered, topics covered)."

Rationale: Under TREES Safeguard C and D, jurisdictions must ensure meaningful and effective participation, which means jurisdictions must take steps to ensure stakeholders are *informed*. However, BCB 2-1 now raises the bar, requiring – evidence that IPLC capacity has been tangibly improved as a result of program support.

• Negotiation in REDD+ Jurisdictional Processes

Theme 2. Enabling Conditions and Capacity Building

Mandatory Indicator 2-2: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) generated or strengthened the necessary enabling conditions for the participation and influence of IPLCs and their representative institutions in public decisions and policies, including the enabling conditions for participation of women and youths from Indigenous Peoples and Local Communities

Theme 2. Enabling Conditions and Capacity Building

Optional Indicator 2-6: Optional Indicator 2-6: The REDD+ program provides concrete means for IPLCs to participate in monitoring and evaluation activities of REDD+ components, activities, and/or results

Theme 3. Territorial Rights

Mandatory Indicator 3-1: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to consolidate the legal recognition of IPLC land ownership rights.

Revised wording: "The REDD+ program has created or enhanced long-term enabling conditions - beyond those required under TREES - for IPLC institutions to meaningfully participate in and influence in REDD+ and forest governance decision-making – including mechanisms that further improve representation, empower IPLC institutions, and expand the participation of women and youth (e.g. creation of new leadership structures, legal reforms, gender/youth quotas). Jurisdictions must provide evidence of inclusive participation mechanisms in practice, including measures to ensure the leadership and decision-making roles within IPLC governance structures and broader policy processes."

Rationale: TREES requires inclusive and culturally appropriate participation (Safeguard D), but does not require programs to show institutional transformation or support to IPLC decision-making bodies. BCB 2-2 now goes beyond by focusing on systemic empowerment and leadership development.

Revised wording: "The REDD+ program provides IPLCs with structured, sustained, and culturally appropriate opportunities to participate in the design, implementation, and interpretation of monitoring and evaluation systems for REDD+ components, activities and outcomes. This includes support for community-based monitoring activities, capacity building for data collection and analysis, participatory audits and feedback mechanisms that influence program decisions."

Rationale: TREES expects stakeholder meaningful engagement in REDD+ implementation. BCB 2-6 now explicitly recognizes and rewards this level of IPLC co-governance and technical engagement – a clear step beyond baseline participation safeguards.

Revised wording: "The REDD+ program demonstrates that it has contributed to new or expanded legal recognition of IPLC land rights – for example, through the issuance of new land titles, formal demarcation of customary territories, or amendment of laws/policies to secure tenure. Jurisdictions must show evidence of net improvement in legal protection or formal recognition of IPLC land ownership."

Rationale: Under TREES Safeguard B and C legal recognition of tenure is a prerequisite. BCB goes beyond by requiring documentation of enhancements in tenure security during program implementation.

Theme 3. Territorial Rights

Mandatory Indicator 3-2: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to reducing existing barriers (i.e. legal, regulatory, cultural, economic) to progress towards gender equity in access to land and natural resources and to strengthening women's ownership, use and/or access rights to land and natural resources.

Theme 3. Territorial Rights

Mandatory Indicator 3-3: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to the jurisdiction developing or strengthening a legal framework and/or official policies that avoid retrogression and that recognize the rights of the IPLCs to the ownership of or benefits from CO2 emission reductions and removals associated with their lands and/or activities.

Revised wording: "The REDD+ program has taken specific actions to reduce gender-based barriers to land and natural resource access (legal, customary, or institutional), resulting in measurable improvements in women's land use, ownership, or decision-making authority – e.g. changes to land law, registration systems, or representation in land governance bodies."

Rationale: TREES requires equitable treatment of women and vulnerable groups, but does not require programs to demonstrate active improvement in gender equity. This BCB indicator shifts focus to progressive outcomes on gender and tenure.

Revised wording: "The REDD+ program has contributed to the adoption or operationalization of legal, policy, or institutional measures that provide IPLCs with legally recognized entitlements to a defined share of carbon benefits or credits from REDD+ activities on their lands—beyond existing tenure recognition—while also establishing safeguards against retrogression. These measures should include enforceable rights to participate in benefit-sharing decisions, transparent mechanisms for allocation or transfer of benefits, and evidence of integration into national or subnational REDD+ governance frameworks."

Rationale: This amended indicator:

- Goes beyond TREES Safeguard C
 applications to date. While this may change in
 the future, current interpretations require
 recognition of existing land rights, but not
 recognition of carbon-related entitlements
 (i.e., IPLC claims to benefit from
 ERs/removals)
- Adds a focus on legal operationalization, not just policy statements—i.e., requiring implemented, enforceable mechanisms for IPLC inclusion in REDD+ benefit frameworks.
- Emphasizes integration into REDD+ governance rather than general legal improvements—elevating it to a systemic change, not just a localized effort.
- Calls for safeguards against retrogression to be tied specifically to carbon-related rights, not just land tenure.
- Requires evidence of implementation (e.g. laws passed, benefit-sharing frameworks operational, formal recognition granted),

Theme 3. Territorial Rights

Mandatory Indicator 3-4: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) strengthened the regulatory framework and/or its implementation to guarantee the right of IPLCs to the sustainable management and use of the forests in their territories

Theme 4: Recognition and Recovery of Ancestral Knowledge and Cultural Identity

Mandatory Indicator 4-1: The REDD+ program has incorporated the knowledge and wisdom of Indigenous Peoples and Local Communities about biodiversity (genes, species, and ecosystems) as well as about its use, management, and conservation

Social-Cultural – Theme 4: Recognition and Recovery of Ancestral Knowledge and Cultural Identity

Mandatory Indicator 4-2: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) strengthened biodiverse and sustainable ancestral or traditional land use systems (agricultural, agroforestry, forestry, etc.) of IPLCs.

pushing the indicator from an enabling condition to a verified co-benefit outcome.

Revised wording: "The REDD+ program has contributed to improved legal or policy conditions for IPLCs' sustainable forest management – such as legal reforms, tenure-related investments, community forestry authorizations, or strengthened enforcement of rights. Verification focuses on improvements beyond pre-existing rights – not their recognition alone."

Rationale: TREES requires respect for IPLC rights to manage land and forests, but does not require programs to improve or expand those rights. BCB thus now clearly incentivizes enhanced governance capacity or legal guarantees tied to REDD+ implementation.

Revised wording: "The REDD+ program demonstrates how it has incorporated IPLC biodiversity knowledge (including genes, species, ecosystems, and their use, management, and conservation) into specific program design and management activities (e.g. conservation planning, restoration design, land-use zoning) - including documentation of co-developed practices or protocols in ways agreed upon by the knowledge holders. The emphasis is on practical application and value creation from ancestral knowledge. Jurisdictions must demonstrate how this knowledge was applied, what safeguards were used to ensure intellectual property rights and cultural integrity, and how IPLC consent and leadership were integrated into the knowledgesharing process."

Rationale: TREES Safeguard C requires that traditional knowledge be protected and not misused. This BCB indicator now goes beyond by recognizing programs that actively and meaningfully apply IPLC knowledge in REDD+ implementation.

Revised wording: "The REDD+ program strengthens sustainable traditional land-use systems through technical, financial, or institutional support – including ancestral agroforestry, rotational systems, or forest management practices that maintain biodiversity based on priorities set by IPLC communities themselves. Programs must show enhancement of such practices beyond their baseline existence through the documentation with evidence of community leadership, free, prior, and informed consent, and gender and intergenerational inclusion in planning and implementation."

Social-Cultural – Theme 4: Recognition and Recovery of Ancestral Knowledge and Cultural Identity

Optional Indicator 4-4: The REDD+ program implements measures to protect, respect, recover, strengthen, and adapt according to community decisions the cultural identity and knowledge systems of IPLCs

Social-Cultural – Theme 4: Recognition and Recovery of Ancestral Knowledge and Cultural Identity

Optional Indicator 4-5: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to the transmission of cultural identity and ancestral knowledge to the youth and children of the IPLCs through mechanisms led by IPLCs themselves.

Social-Cultural – Theme 5: Territorial Governance

Mandatory Indicator 5-1: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to generating strategic agreements for territorial governance (including on territorial policies, joint actions, destination and use of REDD+ or other resources in the territory, social investments, comanagement of Natural Protected Areas, protection of sites and natural resources, etc.) between IPLCs, governments, and other stakeholders through effective participation processes.

Rationale: TREES Safeguard C requires protection of traditional systems, but not their revitalization. This BCB indicator now captures efforts to improve and scale ancestral land-use systems as active conservation strategies.

Revised wording: "The REDD+ program supports IPLC-led initiatives to revitalize and adapt cultural identity and knowledge systems – including recovery of language, cultural governance, rituals linked to land stewardship, and place-based memory, in ways defined by the communities themselves. Programs must document specific mechanisms (e.g. cultural councils, educational content, community archives)."

Rationale: This indicator now promotes a cultural cobenefit that goes beyond TREES, which only mandates recognition and protection of culture, not its recovery or adaptation. BCB creates space for cultural innovation, not just preservation.

Revised wording: "The REDD+ program supports intergenerational knowledge transmission through IPLC-led mechanisms – such as youth forest schools, language and cultural heritage camps, or mentorship-based transmission of traditional ecological knowledge. Verification includes community-defined indicators of youth engagement."

Rationale: This indicator introduces a distinct cobenefit dimension of cultural continuity and generational stewardship. TREES does not require support for knowledge transmission; BCB now adds this as a new outcome metric.

Revised wording: "The REDD+ program has supported the development, implementation or formal recognition of strategic territorial governance agreements between IPLCs, government entities, and other stakeholders – such as memoranda, joint policy frameworks, or co-management protocols. – that go beyond TREES-required consultation and demonstrate sustained collaboration between IPLCs and state authorities on REDD+ or forest governance issues. Jurisdictions must provide evidence that IPLCs (including women and youth) have effectively participated in the negotiation and oversight of these agreements, and that such agreements align with IPLC-defined governance systems."

Rationale: TREES Safeguards D and C require consultation, participation (including free, prior and informed consent, where applicable); BCB now emphasizes the outcome: durable, joint governance arrangements, co-created with IPLCs, implementation

Social-Cultural – Theme 5: Territorial Governance

Mandatory Indicator 5-2: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to the implementation of measures to facilitate and increase the participation of women and youths in decision-making spaces related to forests and territories (at the community, local and national level)

Social-Cultural – Theme 5: Territorial Governance

Mandatory Indicator 5-3: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to strengthening and/or creating platforms for dialogue and territorial governance between IPLCs and governments.

Social-Cultural – Theme 5: Territorial Governance

Optional Indicator 5-7: The REDD+ program has either directly (REDD+ planned activities) or

and recognition, not just planning. Shifts from indirect "contributions" to verifiable governance outcomes.

Revised wording: "The REDD+ program has demonstrably supported the implementation of culturally appropriate and community-led measures that increase the representation and leadership of women and youth in forest-related governance – such as quotas, leadership programs, or targeted support for women/youth-led forest initiatives. Jurisdictions must provide evidence that these measures have resulted in meaningful roles, such as elected positions, voting power, or formal influence on policy, and that barriers to participation have been identified and addressed"

Rationale: TREES mandates inclusive participation but does not require programs to track improvements in influence or leadership roles for women/youth. BCB now goes beyond by measuring progressive change in power dynamics. Emphasizes effective participation, not just presence and adds expectation of evidence (e.g., seats held, decisions influenced). Addresses structural barriers to participation, not just invitations to join.

Revised wording: "The REDD+ program has supported the establishment, strengthening or institutionalization of permanent formal and inclusive dialogue platforms or governance bodies that enable sustained interaction and decision-making between IPLCs and government entities. These platforms must be co-design with IPLCs to be culturally appropriate and to ensure equitable representation, especially of women and youth. Jurisdictions must provide evidence that these platforms are actively functioning, that can influence forest and territorial governance, and are aligned with IPLC governance rights, systems and priorities."

Rationale: TREES requires participatory planning in REDD+ (Safeguard D), but does not require institutional dialogue bodies. This BCB indicator now explicitly rewards jurisdictions that build sustained governance infrastructure for IPLC engagement and management over forests and territories. Addresses sustainability and institutionalization, critical for long-term impact. Aligns the indicator with BCB's aim to verify real and transformative outcomes.

Revised wording: "The REDD+ program has supported the development and implementation of community-led strategies to protect environmental defenders – including IPLC community monitors, land guardians, or local REDD+ critics – from physical,

indirectly (funding or other impacts resulting from the REDD+ program) contributed to implement strategies and effective measures to protect IPLC environmental defenders. legal, and reputational threats related to their role in forest and territorial protection through risk assessments, innovative protection protocols, or alignment with regional agreements (e.g. Escazú). Verification includes evidence of formal protective measures beyond those that would ordinarily be required for the jurisdiction to ensure respect for the life and physical integrity of IPLC environmental defenders, as required by the Cancun Safeguards."

Rationale: Cancun Safeguards C, D, and even B will already require governments to ensure that environmental defenders do not have their life or physical integrity interfered with (harassment, violence, intimidation, etc). BCB now adds a new, rights-based co-benefit by recognizing jurisdictions that take added steps to create a safe enabling environment for IPLC leadership and activism.

Revised wording: "The REDD+ program demonstrates how it has supported the operationalization, institutional recognition or implementation of IPLC-developed REDD+ frameworks and projects, schemes, mechanisms, principles, or proposals (e.g. REDD+ Indígena Amazónico, local forest protocols). Support must be provided in ways defined by IPLCs and may include direct funding, legal or policy alignment, technical collaboration, or inclusion of IPLC governance structures in program design. Evidence includes use in policy or program design, financial support to IPLC governance institutions and documentation of outcomes."

Rationale: While TREES requires IPLC participation, it does not require that REDD+ contribute to the strengthening of, or incorporate IPLC-led frameworks. BCB now creates space to reward jurisdictions that elevate Indigenous-designed mechanisms and projects as a co-benefit outcome. Adds clarity about what kind of support qualifies (e.g., legal, financial, technical). Requires documented results, not just intent.

Revised wording: "The jurisdiction has identified and mapped a spatial inventory of Key Biodiversity Areas (KBAs) and other nationally, regionally, or globally important biodiversity areas within the TREES accounting area, using internationally recognized criteria (e.g. IUCN KBA Standard) and involving Indigenous Peoples and Local Communities (IPLCs) in the identification process. Jurisdictions must demonstrate that the identification process is documented, scientifically robust. Updates to this

Social-Cultural – Theme 5: Territorial Governance

Optional Indicator 5-8: The REDD+ program has either directly (REDD+ planned activities) or indirectly (funding or other impacts resulting from the REDD+ program) contributed to strengthen and implement the schemes, mechanisms, principles, or proposals that IPLCs have previously built related to REDD+ (such as REDD+ Indigena Amazónico or others)

Biodiversity – Outcome 1: Identify key biodiversity areas (KBA) and other areas of global and regional biodiversity significance

Indicator 1-1: KBAs and other areas significant for global and/or regional biodiversity conservation within the TREES accounting area are defined and identified Biodiversity – Outcome 2: Protect and/or enhance the biodiversity value of the areas identified in Indicator 1-1

Indicator 2-1: The REDD+ program directly or indirectly leads to ecological restoration or improved management that conserves, and if possible, improves, the important biodiversity values of the TREES accounting area.

Biodiversity - Outcome 2: Protect and/or enhance the biodiversity value of the areas identified in Indicator 1-1

Indicator 2-2: The REDD+ program directly or indirectly establishes and/or protects sites that are large enough and/or ecologically connected enough to conserve the biodiversity values in the long term.

inventory occur at regular intervals (e.g. annually), and are integrated into REDD+ planning and monitoring."

Rationale: TREES Safeguard E requires jurisdictions to identify and map natural forests and ecosystems as part of ensuring no conversion. However, it does not require a KBA-focused, participatory biodiversity inventory using international conservation criteria or publicly reporting it. This BCB indicator now builds on the TREES baseline by turning implicit mapping duties into an auditable performance metric with transparency and global alignment. Adds reference to recognized standards and frameworks.

Revised wording: "The REDD+ program has implemented demonstrable ecological restoration or enhanced management practices in the areas identified under Indicator 1-1 that result in measurable improvement of key biodiversity values. (e.g. forest regeneration, habitat quality, species richness). These practices must be intentional, documented and aligned with recognized biodiversity conservation approaches. Jurisdictions must provide evidence of ecological outcomes and results must exceed minimum environmental safeguards and demonstrate active restoration or recovery of degraded biodiversity areas."

Rationale: TREES Safeguard E requires REDD+ activities to avoid adverse impacts and *incentivize* environmental benefits. BCB now goes beyond by *requiring* positive biodiversity outcomes that can be documented and verified as co-benefits (not just avoiding harm). Requires evidence of outcomes.

Revised wording: "The REDD+ program contributes to the protection, restoration, or designation of sites identified in Indicator 1-1 that are of sufficient size and/or ecological connectivity to support the long-term conservation of key biodiversity values. These areas should be part of a broader landscape-level strategy aligned with national or international spatial planning frameworks. Jurisdictions must provide spatial and ecological justification for the adequacy of site size or connectivity and describe long-term governance arrangements."

Rationale: TREES requires natural forest conservation, but it does not require jurisdictions to establish new protected areas or ensure connectivity. BCB now incentivizes jurisdictions to build or reinforce conservation infrastructure beyond maintaining existing conditions. Requires a landscape

Biodiversity - Outcome 2: Protect and/or enhance the biodiversity value of the areas identified in Indicator 1-1

Indicator 2-3: The REDD+ program directly includes or incentivizes sustainable forest management (SFM) practices which are biodiversity friendly. (This is a mandatory parameter only if sustainable forest management is part of the REDD+ Program)

Biodiversity – Outcome 3: Incentivize activities or conditions that minimize the risk of harming biodiversity value of the areas identified in Indicator 1-1

Indicator 3-1: The REDD+ program directly or indirectly includes activities or programs to prevent over-exploitation of biodiversity resources.

Biodiversity – Outcome 3: Incentivize activities or conditions that minimize the risk of harming biodiversity value of the areas identified in Indicator 1-1

Indicator 3-2: The REDD+ program directly or indirectly includes a management plan or program to:

approach, supporting ecological resilience and sets an expectation for justification and documentation.

Revised wording: "Where applicable, the REDD+ program demonstrates that it has implemented biodiversity-positive SFM practices, such as retention of habitat trees, minimal impact harvesting, or conservation set-asides – that are explicitly designed to maintain or enhance biodiversity. These practices must be documented, ecologically designed, and go beyond regulatory minimums or standard SFM protocols to explicitly safeguard biodiversity in managed forest areas. Jurisdictions must provide evidence that SFM activities avoid key biodiversity risks (e.g., habitat fragmentation, overharvesting, degradation of high conservation value forest)."

Rationale: While TREES prohibits SFM practices that harm biodiversity, BCB now requires that such practices are positively aligned with biodiversity enhancement objectives, not merely neutral or compliant. This indicator turns SFM into a measurable co-benefit, not just a compliance category. Defines "biodiversity friendly" using concrete risk-avoidance and enhancement principles.

Revised wording: "The REDD+ program demonstrates that it has implemented activities, programs, or governance measures to prevent overexploitation of biodiversity resources (e.g. regulated harvesting, traditional conservation zones, wildlife management plans) within the areas identified in Indicator 1-1, beyond national regulatory requirements. Verification should include monitoring of extraction levels, compliance measures, or IPLC-led enforcement systems."

Rationale: While TREES Safeguard E prohibits adverse biodiversity impacts, it does not require active demonstration of how over-exploitation is being prevented. This BCB indicator now formalizes that expectation, requiring jurisdictions to show concrete efforts and data. Requires monitoring and verification, increasing credibility and strengthening the indicator by focusing on demonstrable actions and outcomes.

Revised wording: "The REDD+ program has implemented a documented management plan or program to prevent the introduction or spread of invasive alien species in REDD+ activities, and to strictly limit the use of any non-native species aligned with IUCN guidance and relevant national guidelines. The plan includes preventive measures to avoid introduction of alien species, detailed risk assessments for any planned introductions, and adaptive

- Prevent the use of invasive alien species in REDD+ program activities
- Aim to minimize the use of any alien species in REDD+ program activities. This should be limited to specific circumstances and include a risk analysis of the use of any non-native species following IUCN invasive species standards.

Biodiversity - Outcome 3: Incentivize activities or conditions that minimize the risk of harming biodiversity value of the areas identified in Indicator 1-1

Indicator 3-3: The REDD+ program directly or indirectly includes a management plan or program to mitigate the impact of invasive alien species found in areas identified in Indicator 1-1.

Biodiversity – Outcome 4: Incentivize creation and maintenance of a biodiversity governance mechanism(s)

Indicator 4-1: The REDD+ program has directly or indirectly resulted in a biodiversity governance mechanism that results in the long-term conservation of the identified key biodiversity areas from Parameter 1-1.

management protocols. Verification must include policy or technical documentation and results from risk screenings."

Rationale: TREES requires that REDD+ not harm ecosystems, but it does not mandate invasive species plans. This BCB indicator now adds clarity, structure, and verification requirements – turning an implied safeguard into an auditable co-benefit performance area.

Revised wording: "The REDD+ program has implemented a management plan or control strategy to mitigate the impact of invasive alien species (IAS) in key biodiversity areas (identified in Indicator 1-1). The plan must include species control programs, specific risk assessments, removal campaigns, community-based management, or restoration of native species in alignment with IUCN guidance and national IAS strategies. Verification includes plans, actions taken, and outcomes."

Rationale: BCB builds upon the safeguard requirements of TREES safeguard E, by requiring management response and tracking, turning this into a documented enhancement outcome. Supports alignment with science-based and community-grounded management.

Revised wording: "The REDD+ program has led to the creation or institutionalization of a biodiversity governance mechanism (e.g. multi-stakeholder committee, biodiversity trust fund, or dedicated agency unit) that ensures long-term conservation of identified Key Biodiversity Areas (KBAs) in Indicator 1-1. The mechanism must be formally recognized, have an operational mandate, include clearly defined roles, responsibilities, decision-making processes and demonstrate continuity beyond the program implementation period. Jurisdictions must demonstrate that the mechanism is operational, appropriately resourced, and aligned with national biodiversity strategies."

Rationale: TREES does not require the formation of biodiversity-specific governance structures under Safeguard C and D, although they call for stakeholder participation in REDD+ implementation; and a participatory biodiversity governance mechanism is essentially an embodiment of that principle. This BCB indicator now clearly recognizes new institutional innovations designed for long-term biodiversity stewardship – a co-benefit outcome beyond the

Biodiversity – Outcome 4: Incentivize creation and maintenance of a biodiversity governance mechanism(s)

Indicator 4-2: The REDD+ program has resulted in or supports a biodiversity governance mechanism(s) that is designed, implemented, and monitored in a participatory process, inclusive of Indigenous Peoples and Local Communities. baseline safeguards. Specifies that the mechanism must be intentional, functional, and verifiable.

Revised wording: "The REDD+ program has supported the development of a biodiversity governance mechanism that is explicitly co-designed, governed, and reviewed with IPLC participation – through decision-making roles, consultation protocols, or dedicated IPLC seats on governance bodies. Jurisdictions must provide evidence of how IPLC participation has shaped governance decisions, and there must be documentation of community engagement throughout the process."

Rationale: TREES Safeguard D requires IPLC participation in REDD+ planning and benefit-sharing but does not mandate co-governance or participation in biodiversity-specific structures. This BCB indicator now clearly introduces a higher standard of shared governance and inclusive biodiversity management. Moves from vague "support" to clear responsibility and action.

Forest Services Outcome 1: Maintain or Improve Water Quality

Indicator 1-1: Percentage of riparian areas in each watershed covered by native forests is maintained or improved.

Revised wording: "The REDD+ program contributes to the maintenance or increase of native forest cover in riparian zones within each watershed in the TREES accounting area. Jurisdictions must define riparian areas using ecologically justified criteria (e.g., buffer width, proximity to streams/rivers) and report baseline and monitoring data to show positive or stable trends. Reporting includes geospatial analysis of riparian buffer integrity and identifies any restoration or protection interventions undertaken to support water quality functions."

Rationale: TREES Safeguard E (Theme 5.2) requires that REDD+ activities avoid harm to ecosystem services, which implicitly includes water quality. However, it does not require specific tracking of riparian forest cover. This BCB indicator turns that implicit expectation into an explicit performance metric, incentivizing programs to prioritize riparian health as a quantifiable co-benefit.

Forest Services Outcome 1: Maintain or Improve Water Quality

Indicator 1-2: The REDD+ program has resulted directly or indirectly in programs or activities maintaining or improving water quality in watersheds.

Revised wording: "The REDD+ program has implemented activities or governance measures that maintain or improve water quality in one or more watersheds within the TREES accounting area (e.g. reforestation, erosion control, pollution reduction, wetland restoration). Jurisdictions must provide evidence of water quality benefits and describe how these activities were implemented.

Rationale: While TREES expects that REDD+ activities will not harm water-related ecosystem

	services, it does not require programs to actively improve or report on water quality. This BCB indicator creates an additional performance obligation, requiring jurisdictions to show how REDD+ has positively impacted watershed conditions. Focus on demonstrable outcomes, not just indirect or assumed effects.
Outcome 2 : Maintain or Improve Soil	Revised wording: "The REDD+ program has
Retention Indicator 2-1: Percentage of areas with greater than 12% slope covered by native forests is maintained or improved.	maintained or increased native forest cover on slopes greater than 12% slope) within the TREES accounting area, with reporting based on geospatial mapping and trend analysis. Jurisdictions must provide geospatial evidence (e.g., satellite imagery, slope analysis, participatory mapping) of baseline and current forest cover and demonstrate how REDD+ activities contribute to positive trends."
	Rationale: TREES Safeguard E requires programs not to degrade ecosystem services, which includes soil retention. However, TREES does not require slope-specific monitoring or coverage targets. BCB 2-1 turns this implicit safeguard into an explicit quantitative standard with reporting obligations for forest cover in erosion-sensitive zones. Adds verification and baseline logic.
Outcome 2 : Maintain or Improve Soil	Revised wording: "The REDD+ program has
Retention Indicator 2-2: The REDD+ program has resulted directly or indirectly in programs or activities maintaining or improving soil retention	implemented or supported specific interventions that improve soil retention (e.g. contour planting, reforestation of degraded slopes, agroforestry systems, terracing, or erosion control structures) within the TREES accounting area. Jurisdictions must provide evidence of soil retention benefits (e.g., reduced erosion, improved ground cover, sediment load reduction)."
	Rationale: TREES does not require jurisdictions to
	implement or report on soil retention activities per se – only to avoid harm. This BCB indicator now clearly introduces a new performance obligation: documented enhancement of soil stability and erosion mitigation through targeted land management. Introduces clear expectations for evidence of effectiveness.
Outcome 3: Maintain or Improve Climate	Revised wording: "The REDD+ program
Regulation	demonstrates that it has monitored and maintained or improved forest ecosystem health in the TREES
Indicator 3-1: The health of the forests included	accounting area over time, using indicators such as
in the TREES accounting area is maintained or improved	canopy density, biomass, species diversity, or signs of degradation. " Jurisdictions must provide baseline and monitoring data to assess trends in forest health and describe how REDD+ activities (e.g., avoided

deforestation, sustainable forest management) have contributed to positive outcomes."

Rationale: TREES safeguards require that REDD+ actions do not cause degradation of ecosystem services but do not require jurisdictions to monitor or report forest health indicators beyond carbon. BCB makes this a standalone co-benefit outcome, incentivizing programs to demonstrate long-term ecosystem integrity that supports climate regulation beyond CO₂ storage. Makes "forest health" operational and measurable, not aspirational.

V. Conclusion

This technical review has assessed the draft BCB standard in relation to ART-TREES 3.0, with a particular focus on safeguard alignment, outcome differentiation, and the integrity of co-benefit certification. Through detailed indicator-level mapping and thematic analysis across the Social-Cultural, Biodiversity, and Forest Services modules, the review concludes that the BCB standard introduces important performance-oriented enhancements, but also contains significant areas of conceptual and operational overlap with existing TREES safeguard requirements. BCB indicators reveal substantial potential for advancing beyond safeguards and delivering measurable co-benefits aligned with climate, biodiversity, and social justice goals. BCB's core value lies in incentivizing actions that go beyond harm avoidance to generate documented gains in equity, ecosystem function, and local empowerment.

A key finding is that while BCB offers clear added value in areas such as benefit delivery quantification, biodiversity restoration, community-led governance, and the protection of ecosystem services, it also reiterates safeguard elements that are already required under TREES—particularly in relation to land tenure, participation, biodiversity protection, and avoidance of harm. In such cases, unless a BCB indicator is demonstrably restructured to reflect a beyond-compliance outcome, its inclusion risks confusing the role of BCB as a co-benefit certification and instead may be interpreted as duplicative, diluting TREES requirements. In such cases, duplication can confuse implementers and auditors, leading to inefficiencies, blurred accountability, and certification fatigue. Worse, it could unintentionally weaken safeguard enforcement by framing core obligations as optional co-benefits.

It is essential to reinforce that TREES remains the primary standard and sole authority for verifying compliance with Cancun Safeguards. BCB must not act as a second verifier of safeguard adherence, nor should it be used to compensate for perceived shortcomings in TREES. If fundamental gaps exist in TREES, they should be addressed directly through its formal revision process—not via the BCB framework.

Similarly, BCB should not be interpreted as shifting TREES' outcome-oriented requirements onto an optional certification layer. Rather, BCB should build upon the firm foundation of TREES safeguards and serve as a mechanism to recognize and reward jurisdictions for delivering verifiable, beyond-carbon social and environmental performance. Central to this role is the need to elevate Indigenous Peoples and Local Communities not only as participants, but as rights-holders with governance authority and decision-making power, particularly regarding benefit-sharing, territorial governance, and biodiversity stewardship.

The review offers a series of textual amendments, clarifications, and framing suggestions aimed at improving the clarity, structure, and intent of BCB indicators. It recommends eliminating or revising overlapping indicators that do not demonstrate added value, refining language to emphasize enhancement and measurable outcomes, and inserting cross-references to clarify the relationship between safeguard duties and co-benefit recognition. It also highlights the importance of repositioning BCB as a forward-looking, performance-based standard that verifies improvement over and above baseline compliance.

To support transparency and implementation, this review provides a preliminary crosswalk between TREES safeguard outcome indicators and BCB requirements. However, this matrix should be treated as a starting point. We recommend that ART convene a participatory process involving jurisdictions, IPLC representatives, civil society actors, and technical experts to finalize this crosswalk, and to incorporate it into BCB's implementation guidance, auditor training materials, and future revisions. This work should be reconciled with final amendments to TREES 3.0, ensuring consistency and usability across the two standards.

With these adjustments, BCB can serve as a technically sound and credible certification framework—one that elevates REDD+ ambition by promoting verifiable social, cultural, and environmental co-benefits, without duplicating or undermining safeguard compliance under TREES. Through clearer delineation of purpose, enhanced outcome orientation, and stakeholder-led refinement, BCB has the potential to support high-integrity jurisdictional climate action while advancing broader sustainable development goals.