

TREES 3.0: Indigenous Peoples and Local Communities Secure Key Wins in Revision of Leading Carbon Market Standard

Jurisdictional REDD+, under the carbon market standard The REDD+ Environmental Excellence Standard (TREES), is expanding quickly across tropical forest countries, carrying both promise and risk for Indigenous Peoples as well as local communities. At its best, jurisdictional REDD+ can help direct climate finance to the peoples and communities who have long protected forests, while strengthening territorial governance, land tenure, and community-led forest protection. At its worst, it can reproduce recurring inequalities: decisions made without rightsholders, benefits promised but not delivered, and safeguards treated as paperwork rather than real protections.

That is why the review of the TREES standard mattered.

The Architecture for REDD+ Transactions (ART) operates TREES—one of the leading standards for jurisdictional forest carbon credits. Since TREES 2.0 was adopted in 2021, experience with ART-certified credits raised important questions about whether communities were being meaningfully consulted, whether Free, Prior and Informed Consent (FPIC) was being respected and verified, and whether information transparency and grievance systems were strong enough to protect communities in practice.

These concerns were not new. Partners of Rainforest Foundation US (RFUS) and Rainforest Foundation Norway (RFN) have long voiced concerns about the level of community engagement in the design, governance, and oversight of these initiatives. At a meeting RFUS and RFN convened during New York Climate Week in 2024, partners identified that the TREES review created an important opportunity to bring those lessons into the standard-setting process.

Over the course of the review, Indigenous Peoples' and Local Community representative organizations, alongside allies, submitted two rounds of input to ART with the technical support of RFUS and RFN. [The first](#), submitted December 2024, provided early technical recommendations for improving TREES 2.0, signed by 14 partners plus RFUS and RFN. [The second](#) responded to the public draft of TREES 3.0 with detailed text proposals, signed by 22 partners, RFUS and RFN, and six additional allied organizations. Across both submissions, the coalition organized its recommendations around three priorities:

- I. Early, inclusive, informed, and meaningful consultation with Indigenous Peoples and Local Communities in the design of jurisdictional programs. From the very beginning of program planning, rightsholders must be proactively consulted in culturally appropriate ways about program choices that may affect their rights, lands, livelihoods, territories, and institutions.

- II. Full and effective participation in decision-making around program design and implementation, including governance structures, fair and equitable benefit-sharing arrangements, and transparent monitoring and reporting. Communities should have a seat at the table when programs are designed, managed, evaluated, and when benefits are allocated.
- III. Stronger quality controls in TREES to ensure Cancún Safeguards – a set of guardrails written into UN Climate Agreements – are rigorously assessed by the third party “Validation and Verification Bodies” that audit a jurisdiction’s reporting to ART. This includes evaluating whether country legal frameworks and on-the-ground actions meet the aims of the safeguards, which intend to protect land and resource rights, FPIC, access to information, participation, and grievance redress, among other issues.

The final TREES 3.0 standard does not include everything the coalition recommended, and important gaps remain. But the coalition’s efforts secured meaningful wins.

FPIC remains in the standard—and is strengthened

One of the most important outcomes in the new standard is that free, prior and informed consent (FPIC), a central tenet of Indigenous Peoples’ rights, remains in TREES 3.0 and is expanded. Across both submissions, partners called on ART to treat FPIC not as a vague reference or one-time procedural step, but as a clear, operational, and verifiable requirement for jurisdictional REDD+ programs. After the scope of FPIC was reduced in the draft of TREES 3.0 published for public comment, partners pushed ART to reinstate FPIC and go further by making it an explicit condition for any REDD+ decision or activity that may affect communities’ rights, lands, territories, resources, livelihoods, or culture.

The final standard now includes FPIC in two “Themes” of TREES—subtopics of the Cancún Safeguards that governments have to report on. Theme 2.3, on land and resource rights, where ART made clear that REDD+ activities must not only cause relocation – a carry over from TREES 2.0 – but also must not affect rights to lands, resources, and livelihoods without FPIC. Meanwhile, FPIC requirements were added to Theme 3.3 on the overall respect, protection, and fulfillment of the rights of Indigenous Peoples, Local Communities, Afro-descendant Peoples, or equivalent groups in ART programs. In this Theme, the requirement for FPIC was in reference to all REDD+ activities that could affect community rights to lands, resources and livelihoods.

This win helps close the gap between simple “consultation” and the deeper standard of consent required when programs affect rights and territories. Moreover, it expands FPIC beyond strictly participation-related concerns, to the full range of impacts of all program components. The new requirements also create a basis for communities to insist that FPIC is not a one-time box to check, but an ongoing process tied to information, deliberation, decision-making, documentation, and the right to withhold or condition consent.

“FPIC is so much more than a checkbox exercise at the start of a program,” said Pablo Mis, Executive Director of the Julian Cho Society of Belize, and active member of the coalition. “It is something we have worked to define with our own communities and with our government through an agreed protocol. Seeing TREES 3.0 strengthen FPIC is important because it gives communities in ART programs a clearer basis to say: consent is an ongoing relationship that must respect our procedures, our timelines, our authorities, and our understanding of what is at stake now or even as risks, benefits, and conditions change.”

Benefit-sharing is now a distinct requirement

Another important gain in TREES 3.0 is the inclusion of a distinct section on benefit-sharing, which TREES 2.0 lacked. Partners had argued that communities need fair compensation and a role in defining fair and equitable benefit distribution plans, including how revenues are allocated, managed, monitored, and reported.

TREES 3.0 now requires jurisdictions to describe the legal, policy, or program framework governing benefit-sharing, and the process for agreeing to arrangements before proceeds from TREES Credits are distributed or used. It also links benefit-sharing to the Cancún Safeguards, which has direct implications on participation, transparency, tenure, resource rights, gender equity, governance, and the rights of Indigenous Peoples and Local Communities. The new section additionally requires reporting on how “proceeds and non-monetary benefits” are distributed, and how arrangements are reviewed, defined, and adjusted over time.

The coalition had recommended stronger requirements for fair and equitable benefit-sharing, including stronger attention to the rights of communities whose territories generate emission reductions. TREES 3.0 does not prescribe a specific benefit-sharing formula, which will require continued vigilance, but the new section creates a stronger foothold for communities to demand transparent and participatory decision making on benefit sharing before carbon revenues are distributed or used.

Sergio Guzmán, a prominent leader of the coalition coming from the Asociación de Comunidades Forestales de la Petén (ACOFOP) of Guatemala, reflects that “updates to the standard on benefit distribution will create more space for communities to demand transparency before revenues are used, and accountability after benefits are distributed. Our community concessionaires in the Petén of Guatemala have shown that when communities can exercise their rights to shape programs and benefit distribution mechanisms, forest finance can support local governance, livelihoods, and long-term forest conservation. These updates to TREES hold promise to better sustain ART program outcomes over time. We will be closely monitoring the country’s jurisdictional program and the transition to the ART standard. Guatemala’s first experience with REDD+ payments for results has provided valuable lessons that have enriched our knowledge and strengthened our capacity to participate in governance and benefit-sharing, and exercise our territorial rights as they should be.”

Other victories for bolstering effective participation

Beyond FPIC and benefit-sharing, TREES 3.0 adopted several procedural improvements recommended by the coalition that can help communities access information and respond to jurisdictional programs.

1. TREES 3.0 now requires copies of key TREES documents – the TREES Concept, TREES Registration Document, and TREES Monitoring Report – to be submitted in any additional language used for the government’s operations in the accounting area. These copies must be posted on the ART Registry to support public comment. This is not the same as requiring translation into all Indigenous or local languages, as recommended by the coalition, but it is a great improvement on TREES 2.0, as these documents were generally only submitted in English before.
2. ART’s public comment period for participating jurisdiction’s documents has been extended from 30 days to 60, as recommended by the coalition. Notably, this period begins once the required translations are posted.
3. Importantly, jurisdictions must now notify stakeholders of the availability of documents and the opportunity to comment in line with their safeguard processes. This is important, as our coalition noted, because ART Registry posting alone is not enough. Many Indigenous leaders and community representatives face language, internet, distance, and capacity barriers that make passive online disclosure insufficient. Jurisdictions will need to show that stakeholders were actually notified through appropriate channels.
4. We also welcome the inclusion of previously under-recognized groups – such as Indigenous Peoples in Voluntary Isolation and Initial Contact, Afro-descendant Peoples, as well as women and youth – representing significant improvements across standard indicators.

According to Jamer Lopez, leader of the Organización Regional AIDSESEP Ucayali (ORAU) of Peru who brought multiple key inputs to the coalition’s submissions, “the participation gains in TREES 3.0 give communities more tools and access to get informed so that Indigenous Peoples can effectively influence the design and implementation of programs, based on our own territorial perspectives, our institutions, and our priorities.”

What communities should remain vigilant about

These gains matter, but TREES 3.0 still defers significant responsibility to jurisdictions, meaning that Indigenous Peoples and Local Communities will need to remain vigilant in every ART program.

1. TREES does not require a formal, dedicated REDD+ multistakeholder governance mechanism—a key demand of the coalition. Instead, it relies on jurisdictions to establish their own participatory processes for the design, implementation, and monitoring of REDD+ activities. Communities should ask early who sits on established governance mechanisms, how representatives are selected, what decisions they can influence, what

the methods of receiving and reporting information are, and whether women, youth, elders, and remote communities are included.

2. TREES appears to assume that stakeholder participation in the design, implementation, and monitoring of the Safeguard Information System (SIS) and grievance redress mechanisms (GRM) can be covered through the broader concept of “REDD+ Activities” adopted by TREES 3.0 (as opposed to the measures reflected within “REDD+ Actions” in TREES 2.0). But TREES 3.0 does not clearly establish a stand-alone requirement that Indigenous Peoples and Local Communities participate in the design or governance of the SIS or GRM. These are critical tools through which safeguard information is disclosed, concerns are raised, and accountability is pursued. Communities should insist that these systems be designed with their participation, in culturally appropriate and accessible formats.
3. Accountability for ongoing FPIC will depend heavily on how communities define it for themselves. TREES now provides stronger FPIC hooks, but lacks a detailed FPIC protocol. Indigenous Peoples and Local Communities should therefore identify, in their own terms, what information they need disclosed, how and when it should be shared, who has authority to speak or decide, how much time is needed for internal deliberation, how consent is documented, and what procedures are required to maintain, modify, suspend, or withdraw consent over time.

The power of jurisdictional REDD+ to strengthen forest governance

Our final read-out of this engagement demonstrates that our advocacy had a positive and far-reaching impact. Through coordinated input, rightsholders and allies helped strengthen one of the most important jurisdictional REDD+ standards in the voluntary carbon market.

As the final standard still leaves significant discretion to jurisdictions in determining how safeguards are implemented and documented in practice, forthcoming safeguards guidance will be essential to ensure consistent expectations across jurisdictions and to help translate broad rights-based commitments into concrete, participatory, and verifiable actions on the ground. Additionally, many of our recommendations touched on TREES reporting templates and the TREES Validation and Verification Standard, due to be updated in the coming months. Considering our recommendations within these will be essential to ensure the standard meets its commitments to rights in practice.

The wins achieved—on FPIC, benefit-sharing, benefit monitoring, language access, comment periods, and stakeholder notice—create new windows for communities to demand accountability.

The original goal of the coalition’s input was to ensure that jurisdictional REDD+ does not merely issue credits, but strengthens traditional territorial governance systems that have long protected forests. If designed and implemented with Indigenous Peoples and Local

Communities as true partners, jurisdictional REDD+ can support sustained emission reductions and removals from the territories where forests remain standing because communities continue to defend them.

“Social integrity cannot be assumed,” asserts Maryka Paquette, Senior Policy Manager at RFUS. “It must be backed by requirements that protect, strengthen, and answer to the communities whose territories make jurisdictional REDD+ possible. The coalition’s contributions to the TREES review helped make those expectations clearer, giving communities stronger language to point to when demanding that FPIC, participation, and benefit-sharing are respected in practice.”