



December 6, 2010

The Honorable Christiana Figueres
Executive Secretary
United Nations Framework Convention on Climate Change
P.O. Box 260124
D-53153 Bonn
Germany

The Honorable Patricia Espinosa
Secretary of Foreign Affairs for Mexico
President of Conference of the Parties
Secretaría de Relaciones Exteriores, Ave.
Juárez #20, Col. Centro, CP 06010, Cuauhtémoc

Delivered by E-Mail

Dear Ms. President and Madam Secretary:

I am writing on behalf of the Society for Conservation Biology, a global organization of conservation professionals. This letter continues the dialogue we began with the UNFCCC delegates and Secretariat before CoP15 in Copenhagen. We address you but we are also speaking to the delegations that you have convened for this meeting and ask your assistance in conveying our concerns to them as well.

Since SCB's President wrote one year ago to the hosts of the negotiations in Copenhagen, advancing science around the world has confirmed the essence of our message of 2009, which we again commend to you and your colleagues.ⁱ

Moreover, in the past year the policy landscape has changed significantly, but the problem of climate change has increased in severity. Scientists have also added significant new findings (including those noted below) that should affect your decisions in Cancun.

Many expect that progress can be made in Cancun on forest conservation and on a variety of greenhouse gases beyond carbon. We hope that you can do so in a manner that preserves and restores the biological integrity of earth's ecosystems.

In your negotiations in Cancun, we therefore urge you to consider the following:

- 1) Recent research shows that temperate and (to a lesser extent) boreal rain forests sequester carbon at higher rates than tropical rainforests and



- currently store more carbon per acre than any other ecosystem type on earth.ⁱⁱ These forests occur in ten locations around the world, yet most of this acreage is not in developing countries. These forests have not been recognized and supported accordingly in climate policy discussions, such as the REDD-plus programme of the United Nations.
- 2) Research continues to suggest that current climate policy mechanisms may unwisely and unnecessarily pit carbon storage against biodiversity conservation and restoration. Avoid replacing native forests with non-native fast growing trees or sacrificing biologically diverse forests if someone pays to spare carbon intense peat.ⁱⁱⁱ
 - 3) Human-caused emissions, particularly those from deforestation (which currently amount to about 17% of fossil fuel emissions globally) continue to increase with no agreement in place that is sufficient to sustain the biological diversity and ecosystem services that underpin our current *modi vivendi*.^{iv}
 - 4) Current levels of climate-driven heat and drought are harming most forests in several ways and are threatening to degrade and convert large areas, for example, of tropical forests, to savannahs. This process would emit large amounts of greenhouse gases and destroy our best protection against climate change.^v
 - 5) The Convention on Biological Diversity already requires its 190+ Parties to regulate any activity that is found to be harmful to biodiversity.^{vi} The CBD's Conference of the Parties has agreed for the time being to defer addressing climate mitigation to the UNFCCC negotiations, but has asked the UNFCCC to protect biodiversity in any land-based mitigation efforts.^{vii} It has also asked the CBD Secretariat to report back after UNFCCC CoP16 on steps that can be taken in cooperation with the Parties to the other Rio Conventions on climate and desertification.^{viii}

Therefore, we urge you to ensure in your deliberations in Cancun, that you:

- 1) Do not pit the health of ecosystems and biodiversity against what may appear to be carbon sequestration gains. Implement ecosystem-based measures and all other climate mitigation and adaptation steps in accordance with the CBD, the Convention to Combat Desertification and other relevant conservation treaties.
- 2) Do not fund forest conservation and restoration primarily through the sale or trading of offsets for the continued use of polluting technologies when better alternatives or controls are available. Support and require ecosystem conservation and restoration in addition to rapid reductions in industrial and other human-caused emissions.
- 3) Do not pit "developed" and "developing" countries against each other in a new agreement. Reward or discipline specific behaviors, technologies and practices wherever they appear.



- 4) Invoke the many legal duties and mechanisms that already exist to control climate change polluters while you work to develop new and additional measures that address climate change and protect the living systems that in turn protect us all.^{ix} For example, the French government is deferring carbon taxes only briefly in order to work with the EU to explore a unified carbon tariff. As we noted in 2009, such a tariff might be used to fund ecosystem restoration and transitions to cleaner production methods.
- 5) In REDD-plus and other relevant negotiations, include the significant contribution of biologically diverse, carbon-dense primary forests in temperate and boreal regions to climate stabilization. Include other carbon-dense systems such as mangroves, salt marshes, kelp forests and other carbon-dense marine life^x, as well as safeguards sufficient to ensure biological and operational integrity.^{xi}

We thank you for your attention and look forward to working with you.

Sincerely,

John M. Fitzgerald, J.D.
Policy Director

Cc: Delegates, Interested Parties

ⁱIn our cover letter to the Host Ministers at Copenhagen we wrote:

In recent months our peer-reviewed journal, *Conservation Biology*, and our magazine, *Conservation*, have carried articles about the rapid melting of the glaciers that supply the rivers on which twenty percent of the world's population rely for water, and what may be the first episode in a series of droughts that could turn the entire Amazon rainforest into a savannah. If that happens, the best of commitments you have discussed to date, even if met, will have been wiped away, for by growing normally that single forest sequesters roughly half the carbon dioxide that all of Europe and Japan emit each year. In 2005, one drought caused that rain forest to reverse its role for the year and emit nearly as much CO₂ as it usually stores. The net impact on the atmosphere was equal to that of all the CO₂ pollution of Europe and Japan combined. The sequestration rates of other tropical rainforests from Malaysia to Costa Rica are also declining in the face of increasing ambient heat. The ramifications of that decline and the potential loss of such forests are profound.

SCB's eleven climate policy recommendations (November 2009) include, among others:



1. Setting a target for greenhouse gas pollutants well below today's levels, rather than above it, and getting there as soon as possible given the damage already being done;
2. Using, and not waiving, all existing laws and policy tools, such as caps, tax, aid and trade measures to reach that goal;
3. Not depending on less reliable offsets, but offering direct assistance and controls to conserve forests and other ecosystems;
4. Protecting the world's primary and older forests for their irreplaceable capacity to capture and store large quantities of carbon for centuries; and
5. Preparing to adapt to climate change by fully funding and guiding ecosystem and wildlife restoration.

The full document is available at <http://www.conbio.org/activities/policy/ClimateChange.cfm>

ⁱⁱ “Temperate and Boreal Rainforests of the World: Ecology and Conservation”, ed. Dominick DellaSala, et al., Island Press, 2011, pp. 30-31 (forest policy recommendations -- Chapter 11.)

ⁱⁱⁱ Biodiversity Conservation in the REDD, Gary D. Paoli et al., *Carbon Balance and Management* 2010, **5**:7doi:10.1186/1750-0680-5-7

Abstract (provisional)

Deforestation and forest degradation in the tropics is a major source of global greenhouse gas (GHG) emissions. The tropics also harbour more than half the world's threatened species, raising the possibility that reducing GHG emissions by curtailing tropical deforestation could provide substantial co-benefits for biodiversity conservation. Here we explore the potential for such co-benefits in Indonesia, a leading source of GHG emissions from land cover and land use change, and among the most species-rich countries in the world. We show that focal ecosystems for interventions to reduce emissions from forest degradation and deforestation in Indonesia do not coincide with areas supporting the most species-rich communities or highest concentration of threatened species. We argue that inherent trade-offs among ecosystems in emission reduction potential, opportunity cost of foregone development and biodiversity values will require a regulatory framework to balance emission reduction interventions with biodiversity co-benefit targets. We discuss how such a regulatory framework might function, and caution that pursuing emission reduction strategies without such a framework may undermine, not enhance, long-term prospects for biodiversity conservation in the tropics.

^{iv} E&E News November 29, 2010 reports: “On November 23, the United Nations Environment Program released a report showing that if all greenhouse gas reduction pledges made at the UN climate summit last year in Copenhagen were achieved, it would only amount to 60 percent of the reductions needed to keep the global warming to 2°C. Instead, the corresponding temperature rise would be approximately 2.5°C. UN Secretary-General Ban Ki Moon said that the emissions gap needed to be discussed at the climate negotiations in Cancun scheduled to begin November 29. Christiana Figueres, executive secretary of the United Nations Framework Convention on Climate Change said, “governments meeting at the U.N. Climate Conference in Cancun will need to both anchor the pledges they made in Copenhagen in the U.N. context and to work swiftly to agree on ways to reduce emissions so that the world has a chance of staying below a 2 degree Celsius temperature rise.””-- “The Emissions Gap Report Are the Copenhagen Accord pledges



sufficient to limit global warming to 2°C or 1.5°C?”, UNEP, 2010,
http://www.unep.org/publications/contents/pub_details_search.asp?ID=4160

^vPhilips O.L. et al. *Drought Sensitivity of the Amazon Rainforest*. *Science* 323, 1344-1347. (2009). SCB’s Conservation Magazine, Vol. 10, No. 3, p.7 (2009) summarized the findings of Philips et al. in “The Forest Giveth and the Forest Taketh Away.” That summary in Journal Watch also included an article in *Nature* in 2009 (Lewis S.L., et al., 457, 1003-6) revealing that all of the world’s tropical rainforests combined sequester 4.8 billion tons a year, which is less than net loss in the Amazon alone in the drought year of 2005 –

A study in *Science* finds that increasing droughts could stunt tropical forests’ growth. In that case, greenhouse-gas concentrations could shoot up even faster than they are now.

The *Science* paper chronicles how, when one of the worst droughts of the last century hit the Amazon in 2005, scientists took advantage of the natural experiment. In a normal year, the Amazon forest absorbs about 2 billion metric tons of CO₂. In the drought year, dying trees caused the forest to release 3 billion metric tons into the air. That 5-billion-ton net carbon belch is greater than the combined annual emissions of Europe and Japan.

Granted, this is only a one-year example. But models foretell more future dry spells for tropical rain belts. University of Leeds ecologist Simon Lewis, an author on both papers, states that no one knows how well rainforests will bounce back from a bout of drier times. And right now, he says, scientists can’t agree on how long the current tropical forest carbon sink will last—or when it will plateau or even reverse itself.

^{vi} Article 8(l).

^{vii} Such as Reducing Emissions in Deforestation and Degradation (REDD+) – COP 10 Decision 5.6 on Biodiversity and Climate Change.

^{viii} Statement on Climate Change and Biodiversity and 2010-2020 Strategic Plan, both approved in Nagoya, 2010.

^{ix} Trade law allows importers who provide fair notice to tariff or ban products produced with methods that are banned in the importing country in the interest of saving public health and exhaustible natural resources, especially when those resources are protected by international agreements (See, *Shrimp and Sea Turtle Appellate Decision of the WTO*, and the WTO-UNEP joint paper on border taxes and other policy responses to climate change, *Trade and Climate Change, A WTO – UNEP Report*, WTO, 2009 -- http://www.wto.org/english/res_e/booksp_e/trade_climate_change_e.pdf --). Article 3 of the CBD requires parties not to harm the environment of other parties and to control actions that degrade biodiversity and to restore degraded ecosystems. CITES requires parties to halt trade in appendix two and three species, including numerous tree species, that are not produced in full compliance with CITES or domestic law. The US also has in the Clean Air Act, the Antiquities Act and numerous other laws very substantial authority to reduce its GHG emissions and to conserve its high-sequestration forests and other ecosystems, particularly those on public lands.

^x An open letter to Cancun delegates on “Blue Carbon Solutions for Climate Change” cites the following reports in support of broadening forest conservation efforts to include coastal and marine systems -- Nellemann, C., Corcoran, E., Duarte, C. M., Valdés, L., De Young, C., Fonseca, L., Grimsditch, G.(Eds). 2009. *Blue Carbon: The Role of Healthy Oceans in Binding Carbon. A Rapid Response Assessment*. United Nations Environment Programme, GRID-Arendal. Norway, 79 pp.

Available at: <http://www.grida.no/publications/rr/blue-carbon/>;

Laffoley, D., Grimsditch, G. (Eds). 2009. *The management of natural coastal carbon sinks*. International Union for Conservation of Nature, Gland, Switzerland, 53 pp. Available at:



http://cmsdata.iucn.org/downloads/carbon_management_report_final_printed_version_1.pdf;

Pershing AJ, Christensen LB, Record NR, Sherwood GD, Stetson PB (2010). The Impact of Whaling on the Ocean Carbon Cycle: Why Bigger Was Better. PLoS ONE 5(8): e12444.

available at: <http://www.plosone.org/article/info%3Adoi%2F10.1371%2Fjournal.pone.0012444>

^{xi} For example, Indonesia has experienced several setbacks and challenges in its forest management that must be controlled for any REDD plus agreement, such as its recent contract with Norway, to be successful. Such controls are essential for any general program as well -- Cautious Optimism over Norway-Indonesia REDD Pact; Gopalasamy Reuben Clements¹, et al., Conservation Biology, Volume 24, Issue 6, pages 1437–1438, December 2010 (<http://onlinelibrary.wiley.com/doi/10.1111/j.1523-1739.2010.01584.x/full>) The efficient allocation of payments also requires an understanding of what works for different landowners and contexts and there are new findings that can help. For example,

CHEN, X., LUPI, F., VIÑA, A., HE, G. and LIU, J. (2010), Using Cost-Effective Targeting to Enhance the Efficiency of Conservation Investments in Payments for Ecosystem Services.

Conservation Biology, 24: 1469–1478. doi: 10.1111/j.1523-1739.2010.01551.x Abstract:

Ecosystem services are being protected and restored worldwide through payments for ecosystem services in which participants are paid to alter their land-management approaches to benefit the environment. The efficiency of such investments depends on the design of the payment scheme...