

Two of the world's largest subnational governmental networks – the Governors' Climate and Forests Task Force ([GCF Task Force](#), a project of the Emmett Institute on Climate Change and the Environment at UCLA School of Law), and [Regions4](#) – submitted a comment letter today providing input to the [Roadmap on Halting and Reversing Deforestation and Forest Degradation by 2030](#). This Roadmap, one of the key results of the 30th Conference of the Parties (COP30) to the United Nations Framework Convention on Climate Change (UNFCCC), serves as an important step forward for global agreement on protecting forests and the billions of people who depend on them. The comment letter was submitted through an [official request](#) for input from the UNFCCC.

The comment letter is included in relevant parts below:

The Governors' Climate and Forests Task Force (GCF Task Force) and Regions4 are pleased to submit inputs to the Roadmap for Halting and Reversing Deforestation and Forest Degradation by 2030 (the "Roadmap"), developed in implementation of paragraphs 33 and 34 of the First Global Stocktake. We welcome the Roadmap's action-oriented mandate and the opportunity to draw upon our decades of combined experience supporting subnational member governments, Indigenous Peoples and local communities (IPLCs), civil society, and private sector actors throughout the world, including in tropical forest regions.

The GCF Task Force is the world's largest subnational governmental network dedicated to protecting forests and reducing emissions, comprising 45 states and provinces from 11 countries that together encompass more than one-third of the world's tropical forests, including all of Brazil's Legal Amazon, more than 85% of the Peruvian Amazon, more than 75% of Bolivia's Amazon, 65% of Mexico's tropical forests, and over 60% of Indonesia's forests. The work of our member states and provinces and their constituent communities provides uniquely grounded evidence for this submission, as does the foundational vision established in our [2022 Manaus Action Plan for a New Forest Economy](#) (Manaus Action Plan).

Regions4 is a global network of subnational governments driving action in climate change, biodiversity, and sustainable development. At Regions4, we act, we connect, we transform. We act by staying close to the territories we serve, embodying transformative change on the ground. We connect regions to each other and to the United Nations, ensuring their voices are heard in global discussions. We

transform by driving real, localized progress in climate change, biodiversity, and sustainable development. We were born in 2002 to represent states, regions and provinces at UN negotiations, European Union initiatives and global discussions on biodiversity, climate change and sustainable development. Regions4 brings together 56 members across 24 countries, including 6 associations of regions, collectively representing 171 subnational governments reaching over 215 million people.

We respectfully offer the following inputs to the Roadmap for Halting and Reversing Deforestation and Forest Degradation by 2030.

I. Introduction

Forests are central to climate mitigation and adaptation, biodiversity conservation, and sustainable development. And yet, the world continues to lose significant areas of forest every year, the loss of which contributes 11% of annual greenhouse gas (GHG) emissions. Despite growing global commitments, significant barriers continue to hinder progress toward halting and reversing deforestation and forest degradation. Climate-induced extreme events are also escalating physical damage to forest ecosystems, increasing the severity of wildfires, droughts, and forest dieback.

Amid these challenges, bottom-up approaches to forest protection and GHG emissions reductions remain essential complements to traditional top-down strategies. This is acknowledged in the Paris Agreement, which underscores the growing recognition of subnational governments (e.g., states, regions, provinces, and departments) as key actors in delivering much of the global climate policy agenda. A central challenge lies in establishing institutional frameworks capable of incentivizing, supporting, coordinating, and scaling these subnational initiatives. At the same time, innovative policy tools, financial mechanisms, and governance approaches—particularly at the subnational level—are demonstrating scalable solutions now.

This submission draws on experiences from across our member jurisdictions to identify critical barriers, enabling levers, best practices, and guiding principles for inclusive and context-sensitive forest governance.

II. Critical Barriers to Halting and Reversing Deforestation

Our on-the-ground implementation experience across tropical and non-tropical forest jurisdictions reveals a consistent set of barriers to halting and reversing deforestation. The Roadmap must name and address these directly.

A. The Finance Gap and Destructive Economic Status Quo

The most fundamental barriers to halting and reversing deforestation are (a) the persistent and severe shortfall in forest finance that is available to protect forests and (b) current economic drivers that continue to place a higher value on land conversion and extraction than on standing forests. The most recent [Forest Declaration Assessment](#) (2025) finds that public finance for forest protection and restoration was between 1.9% and 4.8% of the total estimated amount needed per year to halt deforestation, all while environmentally harmful public subsidies (\$409 billion) and private finance (\$8.9 trillion) continues to support “forest-risk” sectors. This current economic model continues to reward deforestation through agricultural subsidies, tax structures, and commodity supply chains that do not price in the multiple values of forests.

In addition, as the GCF Task Force’s 2024 [Blueprint for a New Forest Economy](#) states plainly:

“[Subnational] governments continue to struggle with budget and staffing cuts. The modest international commitments of funding for forests have generally failed to reach us. And our national governments are facing ongoing fiscal crises marked by massive debt burdens and net capital outflows to the Global North. Most fundamentally, many of the people living in our jurisdictions have yet to see any tangible benefits from the forests and climate agenda, which compounds the political challenges we face in trying to make this agenda politically attractive.”

This is why the GCF Task Force launched a [Call to Action](#) at COP28 to highlight the urgency of attracting funding partners to engage with our member jurisdictions and communities in order to build a New Forest Economy through a “sustained commitment to creating whole new industries” — a structural economic transformation analogous to the clean energy transition. Without redesigning fiscal

incentives and greatly improving access to finance at scale, short-term command-and-control measures will simply not deliver durable results.

B. Governance Gaps: Land Tenure, Continuity, and Coordination

Forest governance can only succeed when it focuses on the people and communities that our member states and provinces represent, when it has durability over time, and when it is done in coordination across government agencies and across sectors. As the [Manaus Action Plan](#) notes, “ongoing efforts to secure land tenure and rights for communities must be the foundation of these efforts.” Insecure land tenure remains a critical barrier to halting and reversing deforestation. Without tenure security, indigenous and local communities cannot defend their forests from encroachment, and outside investors are reluctant to commit capital at scale.

In addition, administrative and political turnover compounds this problem. Sustaining forest protection programs that continue across political cycles requires embedded institutional capacity and durable laws, not merely political declarations. Importantly, subnational networks like ours have mitigated risks around this turnover challenge by maintaining consistent support and capacity building for current and incoming Governors and their teams. These efforts have [shown success](#) but require further support to be maintained and accelerated over time.

Finally, coordination across sectors — agriculture, finance, trade, land use, and environment — remains inadequate at the subnational, national, and international levels. The [Manaus Action Plan](#) acknowledges that subnational governments have “a responsibility to create the enabling conditions and institutional structures that foster investment,” while also noting that many lack the capacity, budgets, and inter-ministerial coordination needed to do so. Addressing these key governance gaps is essential to the long-term protection of forests.

C. Institutional Barriers: Operationalizing Jurisdictional Approaches

Funding the long-term protection of forests through approaches such as jurisdictional REDD+, large-scale conservation initiatives, and other approaches requires significant institutional capacity within a subnational government and more flexible institutional frameworks within the funding organizations. In addition to ensuring adequate staffing and partner expertise (as mentioned above), this capacity includes the ability to connect approaches that are working with flexible

funding mechanisms that can truly support their implementation. While approaches such as REDD+ have been tested and operationalized in some places (including in GCF Task Force member states in Brazil and Mexico), the gap between promising subnational programs and the institutional frameworks needed to receive and account for international forest finance remains a critical and underappreciated barrier.

III. Levers for Accelerating Implementation

Experiences within the GCF Task Force and Regions4 demonstrate that effective levers exist — but they require coordinated international support to be deployed at the scale and speed required.

A. Jurisdictional Approaches as a Primary Vehicle

The most powerful lever available from our perspective is the jurisdictional approach. As the Manaus Action Plan states: “Our efforts to build a new forest economy are based on comprehensive, jurisdiction-wide approaches.” Jurisdictional strategies and investment plans, which most of our member jurisdictions have developed, provide overarching institutional and legal frameworks that link forest protection, biodiversity, livelihood generation, and governance in an integrated manner. The development of these jurisdictional approaches necessarily engages local stakeholders and increasingly seeks to integrate Indigenous knowledge systems that enhance both the effectiveness and equity of forest management. These bottom-up approaches help to derisk investment in our jurisdictions. They also complement top-down policies and are aligned with international climate frameworks such as the Paris Agreement. The Roadmap should explicitly affirm and strengthen support for subnational, jurisdictional approaches rather than defaulting solely to smaller-scale, project-by-project interventions or to national-level programs.

B. New Forest Economy Funding Mechanisms

The 2024 Blueprint identifies four building blocks for the driving investments into a New Forest Economy that the Roadmap should reference and amplify: (1) establishing a thriving bioeconomy; (2) sustaining natural infrastructure; (3) restoring degraded areas; and (4) intensifying current economic activities sustainably (e.g., increasing sustainably produced commodities without additional forest clearing). Each building block requires tailored funding mechanisms that are

levers the Roadmap could advance:

- Bioeconomy Innovation Hubs — linking governments, communities, academia, and the private sector to drive bioeconomy investments, supply chain development, and job creation (with pilots already underway in the Brazilian and Peruvian Amazon).
- Natural Infrastructure Finance Facilities — domestic public financing mechanisms, potentially housed within national development banks, to channel funding for payment-for-ecosystem-services schemes and protect forest infrastructure.
- Regional Forest Restoration Authorities — blending upfront private capital with longer-term repayment tied to restoration results, modelled in part on Forest Resilience Bonds.
- Sustainable Commodity Hubs — partnerships between producers, companies, research institutions, and communities to enhance productivity while reducing deforestation, as demonstrated by Mato Grosso's Produce, Conserve, Include (PCI) strategy.

C. Flexible, Agile, and Rapid Disbursement of Funding

As noted above, international climate finance is often slow, fragmented, and incredibly challenging to access (e.g., proposal-heavy and bureaucratic). Regions4 and the GCF Task Force continue to call for finance mechanisms that are nimble, agile, and capable of rapid disbursement. To that end, the Roadmap should champion design principles like those that are articulated in the Blueprint for a New Forest Economy, including context-specific solutions, learning and adaptation, agility, and rapid delivery. It should also affirm the importance of blended finance structures that combine philanthropy, public climate finance, development bank lending, carbon revenues, payment for ecosystem services schemes, and private investment.

One example of this type of context-specific solution is the Tropical Forest Forever Facility (TFFF) launched by the COP30 Presidency in Belem. The GCF Task Force endorsed the TFFF as a potential game-changer for tropical forests through a network-wide [Carta de Acre](#) that was presented to Brazil's Environment Minister in the leadup to COP30. This Carta notes that subnational action is critical to the success not only of the TFFF, but to the goals of halting and reversing deforestation.

D. Connecting Technology Innovation and Governance

Remote sensing and other innovative technologies are increasingly important tools in the toolkit for subnational jurisdictions. These tools can significantly enhance monitoring and enforcement capabilities. Satellite-based systems and near-real-time deforestation alerts have improved detection of illegal activities, while digitalization of environmental licensing processes has increased administrative efficiency and compliance. However, these tools are most effective when they support government needs and fit within jurisdictional strategies to reduce deforestation and forest degradation. The Roadmap should build on existing efforts to increase the effectiveness and uptake of remote sensing technologies by subnational jurisdictions by supporting capacity-building between providers and tool developers and data users from governments and community organizations who will be assessing how these tools can improve the technical work that supports their recommendations to decision-makers for forest governance decisions and outcomes on the ground.

IV. Best Practices & Lessons Learned

Member governments of the GCF Task Force and Regions4 networks provide some of the most robust on-the-ground evidence available for implementing best practices around forest governance. The following are just a few examples drawn from tropical jurisdictions within the GCF Task Force and other jurisdictions within Regions4.

A. The Norwegian Pledge: Subnational Jurisdictional REDD+ Plans at Scale

In 2015, the Norwegian Government pledged NOK 200 million (approximately USD 24 million) to the GCF Task Force, administered through the United Nations Development Program (UNDP). Between 2017 and 2020, 38 tropical forest member states and provinces developed or updated jurisdictional strategies and investment plans for REDD+ and low-emissions development. An additional USD 5.5 million under the Innovation Funding Window (Window B) supported bold, transformative approaches in Ecuador, Mexico, Brazil, and Indonesia.

The UNDP evaluation “[Subnational Success: Lessons from Tropical Forest Jurisdictions](#)” concluded that “with the right conditions in place, targeted funding for initiatives at a subnational level can have an outsized impact.” Key lessons include: (1) the value of state-NGO co-implementation partnerships; (2) the critical

importance of engaging incoming political administrations to sustain gains; and (3) the need for strong links to national REDD+ processes. This model should be replicated and scaled significantly under the Roadmap.

B. Brazil: Acre's Jurisdictional REDD+ and Benefit Sharing

Acre has one of the world's most robust jurisdictional REDD+ programs, stemming from years of policy development of its State System of Incentives for Environmental Services and community consultation processes. In August 2025, the state concluded its benefits sharing plan in consultation with Indigenous communities and local communities through an official [governmental decree](#) that allocates 72% of any financial benefits from its SISA program to communities for their environmental protection work (22% to Indigenous peoples, 26% to extractivist communities, and 24% for small and medium-scale agricultural producers). In addition, the state also [entered](#) into contract with Standard Chartered for the eventual sale of 40 million jurisdictional REDD+ credits. The results of this work will bring important funding to communities and the state government to continue reducing deforestation.

C. Brazil: Mato Grosso's Produce, Conserve, Include (PCI)

By promoting advanced agricultural practices, improving land-use efficiency, and establishing conservation targets, Mato Grosso's [PCI](#) strategy demonstrates how integrated jurisdictional governance can advance sustainable intensification and forest protections simultaneously. The program achieved soy productivity averaging over 3.5 tons per hectare — among the highest globally — while establishing frameworks to decouple agricultural growth from additional deforestation. The PCI's multi-sectoral architecture — engaging environment, agriculture, land tenure, and finance in an integrated manner — is directly replicable by other large agricultural frontier states.

D. Brazil: Conexão Mata Atlântica Project

The state of [Rio de Janeiro](#) uses payments for ecosystem services to incentivize 240 farming families to conserve and restore nearly 2,440 hectares of Atlantic Forest, covering forest conservation, ecological restoration, and conversion of degraded pastures into agroforestry systems. This program addresses the economic barrier to reforestation by directly compensating landowners for environmental actions while requiring reinvestment of payments into more sustainable production systems. The

integration of environmental and agricultural policy proved key to scaling adoption among rural producers.

E. Brazil: Shared Management of Metropolitan State Forest of Paraná

The Shared Management of the Metropolitan State Forest of Paraná is a [co-management agreement](#) between the state and an Indigenous Kaingang-led community that embeds reforestation with native species as a core activity, while Indigenous presence also deters poaching and illegal encroachment that threaten forest integrity. Traditional ecological knowledge is formally recognized as a pillar of conservation, combining ancestral land stewardship with state technical support. This model shows that within the Paraná context, granting Indigenous communities territorial rights within protected areas can directly strengthen forest protection outcomes.

F. Colombia: Cooperative Agreement to Reduce Deforestation

In late 2023, Colombia's Caquetá department — a GCF Task Force member — launched an [historic pact](#) together with the national government and local mayors to work together to protect biodiversity, reduce deforestation, improve production methods, and emphasize community farming efforts. This pact is an example of the type of intergovernmental coordination that subnational jurisdictions understand and are instrumental in facilitating. The Roadmap should document and promote such efforts as models for replication.

G. Ecuador: Indigenous and Provincial Protected Areas

GCF Task Force member provinces in Ecuador are working with Indigenous Nationalities to create over 14 million hectares of protected areas through an initiative called the [Plataforma Amazonica](#). These areas, co-designed and co-managed with Indigenous governments, demonstrate the power of formalizing IPLC territorial rights as a forest conservation strategy with measurable outcomes. The provinces and Indigenous nationalities, together with Nature and Culture International, are currently finalizing a joint funding mechanism to ensure long-term resources and governance.

H. Indonesia: West Kalimantan - Land-based Mitigation and Adaptation

West Kalimantan received [funding approval](#) through the Green Climate Fund (GCF)

for a project titled “Land-based Mitigation and Adaptation through a Jurisdictional Approach in West Kalimantan.” Developed in 2020, in collaboration with GIZ and supported by the Fiscal Policy Agency – Ministry of Finance, the program aims to empower local communities through sustainable forest management and climate-resilient agricultural practices. It also aims to implement various institutional, technical, and financial interventions that enhance land use governance, increase community participation, and create sustainable economic opportunities. This includes dedicated financing mechanisms for Indigenous Peoples and local communities. This USD 68 million GCF grant is an important recognition of the jurisdictional planning West Kalimantan has undertaken.

I. Mexico: Jalisco’s Zero-Deforestation Agave Certification Program

The production of agave is a main deforestation driver in Jalisco, while also supporting Jalisco’s tequila sector—responsible for 73% of Mexico’s national output. To tackle the environmental impacts of this production while preserving jobs and economic opportunities, the State Government partnered with the Tequila Regulatory Council to design the “[Environmentally Responsible Agave \(ARA\)](#)” certification, committing to halt associated deforestation by 2027. By aligning industry actors, state ministries, and municipal authorities around shared economic and environmental goals, the initiative sits within a broader State Strategy targeting a 50% deforestation reduction by 2024 and 100% by 2030—a compelling model of multi-level governance and policy mainstreaming for subnational climate action.

J. Scotland: Restoring Scotland’s Rainforest

The [Alliance for Scotland’s Rainforest](#) program brings together 24 organizations in a landscape-scale effort to restore 30,000 hectares of fragmented temperate rainforest by 2045, primarily by removing invasive species, managing deer populations, and restoring plantations on ancient woodland sites. The project establishes that restoration must operate at geographical scale to be ecologically effective, as isolated interventions are quickly re-invaded by invasive species. Securing early political commitment, including government pledges at COP26, proved a critical lever for channeling public funding and legitimizing the broader restoration agenda.

K. Additional Lessons Learned

In addition to the programs outlined above, experiences from diverse regions

highlight effective approaches to forest conservation and restoration.

- Policy innovations such as Scotland’s presumption against woodland removal and a shared forest governance model in Québec demonstrate the value of **strong legal frameworks** combined with **inclusive governance**.
- **Technological advancements**, including satellite-based monitoring systems, have **improved enforcement** outcomes by increasing the detection and sanctioning of illegal deforestation.
- **Climate adaptation** strategies are also evolving. In wildfire-prone regions such as California, proactive approaches—including prescribed burns and fuel management—are replacing reactive fire suppression models.
- **Market-based solutions** are increasingly influential. Certification schemes for deforestation-free commodities illustrate how supply chain interventions can address underlying economic drivers of deforestation. Carbon market approaches that include a role for forest projects and jurisdictional REDD+ programs are driving additional finance into forest protection efforts in California, Brazil, Mexico, Peru, Bolivia, and other jurisdictions.
- Integrated programs combining PES, agroforestry, and multi-state coordination in Brazil have shown strong potential for **scaling sustainable land-use practices**.

These are just a few of the best practices and lessons from across our member jurisdictions. More information on jurisdictions in Africa, the Americas, Asia, and Europe is available at www.gcftf.org and <https://regions4.org/knowledge-hub/>.

V. Reflecting Diverse Country Realities, Indigenous Rights, and Varying Forest Cover

As subnational networks, the GCF Task Force and Regions4 have consistently argued that there is no single approach or pan-tropical model for forest conservation. Key reflections based on our experience include:

- **Multi-level governance systems** that integrate national policy direction with subnational innovation, implementation, and community participation are critical for achieving sustainable and equitable outcomes.
- The Roadmap must adopt a **context-specific framework** that allows countries and subnational jurisdictions to select from a menu of policy approaches calibrated to their development stage, institutional capacity, fiscal space, and forest cover trends. What is appropriate for a middle-income

country with a mature national REDD+ architecture may not be appropriate for a lower-income country with fragile institutions and high deforestation pressure.

- **Subnational governments are on the front lines of forest protection efforts.** The Roadmap should explicitly recognize subnational governments as key actors and ensure that financing and capacity-building mechanisms are designed to reach them.
- **Land tenure and rights for IPLCs are foundational.** The Roadmap should emphasize this point, and support subnational governments who are often key partners in the land titling process.
- The Roadmap should **ensure that climate finance reaches IPLC organizations and communities** directly and in a manner that is aligned with their customary rights and traditional knowledge are formally recognized in forest governance frameworks.
- The Roadmap must be explicit that forest conservation cannot be treated as a free service provided by forest jurisdictions in exchange for vague international pledges. As the Manaus Action Plan states, the new forest economy agenda “will never succeed if it does not reduce poverty, enhance livelihoods, and bring meaningful economic opportunities to our people.” The Roadmap should affirm that: (1) **international forest finance must be scaled dramatically and delivered rapidly**; (2) **developing jurisdictions require support** to engage in complex market processes; and (3) the **design of finance mechanisms must include subnational governments and communities** and not simply reflect the needs of donors or market actors.

VI. Additional Recommendations

A. Monitoring, Reporting, and Verification (MRV)

Transparent accounting and remote sensing-based verification are essential for tracking progress and impact. The Roadmap should endorse open-access satellite monitoring platforms (such as Global Forest Watch), best-in-class MRV frameworks for jurisdictional programs, and standardized reporting that enables comparability without creating disproportionate burdens on low-capacity jurisdictions.

B. Addressing Organized Crime and Illegal Clearing

The Roadmap should acknowledge the growing role of organized crime in driving deforestation — including illegal logging, land-grabbing, mining, and illicit

commodity supply chains — and call for strengthened judicial and law enforcement frameworks, cross-border cooperation, and financial investigation capacity. These efforts should be developed in direct collaboration with subnational governments.

C. Sustainable Value Chains and Trade Rules

Developing new market regulations, certification and traceability requirements, and creative local-based solutions are necessary to improve value chains and ensure market access for new products. The Roadmap should address the international trade dimension and reinforce the need for emerging due diligence regulations (such as the EU Deforestation Regulation) to be designed and implemented in a manner that does not inadvertently penalize smallholders and community producers in developing countries but instead recognize the derisking value resulting from the hard work of developing and implementing jurisdictional approaches.

VII. Conclusion

The 2030 deadline for halting and reversing deforestation is within reach — but only if the international community moves from pledge to practice. Subnational networks such as the GCF Task Force and Regions4 provide clear, evidence-based, implementation-ready actions for what a successful New Forest Economy requires. The UNFCCC Roadmap for Halting Deforestation and Forest Degradation should rely on this body of experience and ensure effective inclusion and participation of subnational governments, community groups, and IPLCs in the design and implementation of the Roadmap.

What is needed now is not more study but faster, more flexible, and more equitable finance — delivered through mechanisms designed by and for the forest jurisdictions and communities that are doing the work. The status quo is not working and the world is running out of time.

The GCF Task Force and Regions4 – together with our member governments – stand ready to engage further with the UNFCCC Secretariat, COP30 Presidency, and all relevant stakeholders to advance this agenda. We thank the UNFCCC Secretariat for this opportunity to contribute.