

# PROPOSED UPDATES TO REDD+ NESTING REQUIREMENTS

## 1 INTRODUCTION

For the reasons discussed in the *Consultation Overview*, Verra is working to develop requirements and guidance for REDD+<sup>1</sup> projects nesting into national (or in the interim, subnational) government REDD+ programs. This consultation document includes a high-level summary of concepts, options and key questions to help inform our eventual development of specific nesting requirements and guidance for REDD, IFM and ARR projects<sup>2</sup>. We aim to release the specific nesting requirements, along with any relevant associated tools or modules, in a second public consultation, anticipated in Q2 2020, as described in the *Consultation Overview*. Our aim is to provide nested pathways for projects to be able to support and align with government programs and reference levels in a way that is workable, practical and credible. This will provide projects with longer-term financing certainty and likely access to additional sources of demand and markets, while providing governments with a workable approach to attract private finance for mitigation and further the overall goals of their jurisdictional REDD+ programs.

VCS Program rules currently do not support the development of projects using jurisdictional reference levels unless they are developed under a national or subnational REDD+ program applying the *VCS Jurisdictional and Nested REDD+ (JNR) Requirements*. Many governments have now established forest-related Nationally Determined Contributions (NDCs) under the Paris Agreement and/or forest reference emission levels (FRELs) under their REDD+ programs that have been assessed by the UNFCCC Roster of Experts (in the case of a UNFCCC submission) or another independent body (e.g., related to a results-based payment scheme, such as the *Forest Carbon Partnership Facility's Carbon Fund*). In this context, Verra is considering whether and how VCS REDD+ projects within a jurisdiction with an existing reference level should align with it, and use an allocation approach<sup>3</sup> to determine the project baseline. We are also considering whether and how project nesting rules and guidance would change depending on whether a project is targeting voluntary markets, international markets under Article 6 of the Paris Agreement (i.e., where a corresponding adjustment would likely be needed), or both.

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<sup>1</sup> REDD+ includes reduced emissions from deforestation and degradation (REDD), improved forest management (IFM) and afforestation/reforestation/revegetation (ARR) activities, as defined under the VCS Program.

<sup>2</sup> These requirements will expand on and eventually replace the existing, high-level *Nesting Guidance for REDD+ Projects* issued in July 2019.

<sup>3</sup> An allocation approach could provide a means to spatially distribute the baseline deforestation and/or degradation, based on the fact that smaller areas (e.g., at a district or municipality level) may have different relative threats, thereby strengthening the viability of a REDD+ program and ensuring resources are delivered to forested areas under greatest threat.

Recognizing the above, forthcoming VCS Program nesting updates aim to provide rules and guidance for projects to align with a national (or in the interim, subnational) REDD+ program, where relevant, in particular with the data, parameters and methods of such a program's reference level and monitoring system, while maintaining the rigor and quality of VCUs. Beyond what is covered in the consultation document below, where relevant, REDD+ projects will likely need to address a number of other aspects related to nesting, such as with regards to monitoring, performance and uncertainty. Further details on additional nesting topics will be included in our second public consultation, as described above.

Note that in all cases projects remain subject to any and all national or subnational laws, regulations, agreements or other official government rules, including those relevant to nesting.

We encourage stakeholders to review and provide feedback on each of the key issues included below, including but not limited to responses to specific questions posed.

## 2 REDD PROJECT BASELINES

### 2.1 Developing and Using Jurisdictional Reference Levels

Where a relevant government reference level of sufficient quality exists or is developed, Verra proposes that all REDD projects should derive a "nested" baseline from such reference level. REDD projects are likely to be in one of two primary situations, and nesting options could be structured accordingly, including:

- a) **Where a qualified government-established reference level already exists, where it is likely to exist in the near term (e.g., in the next two years), or where it is possible for the project proponent(s) (or other relevant entity) to work with the government to develop such a reference level; or**
- b) **Where such reference level does not exist, is unlikely to exist in the near term (e.g., in the next two years), and where it is not possible for the project proponent(s) (or other relevant entity) to work with the government to develop such a reference level (e.g., where there is low government capacity and/or interest).**

**For case a) above, Verra is considering the following:**

- 1) It is important for projects to work closely with governments wherever possible in the development of a national (or subnational) reference level and its allocation rules (see allocation section below), in order to:
  - a) Ensure strong project alignment with government programs, goals and objectives;
  - b) Ensure project concerns and ideas are taken into account in the design of government REDD+ program elements; and

- c) Avoid potentially significant modifications to project baselines if the government later establishes a reference level and allocation rules that result in lower project baselines and thus lower potential for emission reductions/removals and income.
- 2) A government reference level would need to first be determined to be “sufficiently robust” according to a set of quality parameters before it could be used for project nesting purposes. Note that these reference levels are likely to improve with each further iteration over time, and in the vast majority of cases a nested project baseline is likely to be more conservative than a baseline derived from an existing project methodology approach. These parameters would include things such as:
- a) The reference level is relevant to the project temporally, spatially and covers relevant activities and carbon pools.
  - b) If there is more than one qualified reference level, the project has checked with the government which reference level the government prefers to be used for project nesting.
  - c) Where the reference level to be used for nesting is not specified by the government and/or where there is no qualified national reference level, a subnational reference level may be used as an interim measure.
  - d) The reference level has been developed for market-based approaches, such as under Article 6 or the Carbon Offsetting Reduction Scheme for International Aviation (CORSA), and has been third-party assessed under JNR, UNFCCC and/or another major GHG program.
  - e) The reference level has been developed and assessed within the last [6-10] years.
  - f) The uncertainty associated with the reference level is under a maximum threshold<sup>4</sup>.
  - g) The reference level includes spatially explicit information and other data characteristics (to be established) that facilitate its use in a standardized allocation tool (see Section 2.2(3)).
  - h) The reference level is more accurate (or more conservative) than an equivalent reference level developed using the *JNR Requirements* (it is under consideration whether this should be historical average only, or should allow flexibility, including trend-based and/or adjustment options).
- 3) Per the high-level *Nesting Guidance for REDD+ Projects* issued in July 2019, where a project is approaching validation or baseline reassessment, and where the government is likely to

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<sup>4</sup> There is a need for a statistician with expertise in jurisdictional reference level development, REDD+ project baseline development and allocation/alignment between jurisdictional and project levels to assess how uncertainty calculations and deductions can be undertaken in a more consistent, transparent, robust and practical way. The objective is to develop a standardized approach to uncertainty in the standalone, nested and jurisdictional contexts, including the possibility of a standardized uncertainty tool. Verra intends to issue an RFP to hire a consultant and engage leading experts over the next few months to assess a range of uncertainty challenges and provide recommended solutions and proposed revisions to our requirements. The detailed set of updates around uncertainty would then be included after the conclusion of the consultant’s work, in the second public consultation described in the *Consultation Overview*.

approve a qualified reference level within two years, Verra has been working with project proponents on a case-by-case basis to permit extensions to the validation or project baseline reassessment deadlines, as appropriate. Any grace period established for project baselines by the jurisdictional government should generally be adhered to, noting that Verra is unlikely to allow an extension to a project baseline reassessment deadline beyond two years.

- 4) As projects increasingly adopt government data and reference levels (and these data and reference levels are updated over time), and noting that different governments will likely have different policies on nesting, it is important for the VCS Program to provide a high level of transparency to the market with regard to the specific nesting circumstances of a given project within a given monitoring period. To increase transparency, we propose creating a section on our public-facing project database which would lay out a set of nesting parameters for REDD+ projects (e.g., characteristics of the jurisdictional reference level used for nesting such as level of uncertainty, type of government approval acquired, status of corresponding adjustment (where relevant)). This section would clearly indicate how a given project aligns with each of these parameters for a given monitoring period. This approach may also facilitate the identification of projects and VCU that meet specific (emerging) domestic and international market requirements (e.g., Colombian domestic market, CORSIA).

#### Key Questions:

These questions represent some of the key issues that we are grappling with in the development of requirements for REDD project nesting. We welcome your inputs on these specific questions and in general, on the concepts presented above.

- 1) Is it necessary to have in place certain minimum quality parameters to ensure sufficient robustness of government reference levels for nesting? If so, which of the above parameters make sense to require? Are there any that are missing?
- 2) Should minimum quality parameters be different for Annex I countries where there may not be a REDD reference level? In these cases could another FREL or NDC baseline (based on the national GHG inventory) be used?
- 3) Does it make sense to require a government reference level to be more accurate (or more conservative) than an equivalent reference level developed using the *JNR Requirements*? In such a comparison, should only the historical average<sup>5</sup> option be used for reference level development under the *JNR Requirements*, or should there be flexibility to include trend-based and/or adjustment options?
- 4) Would it make sense for a third-party to assess (e.g., Verra could facilitate review by a Validation/Verification Body) a government reference level against VCS established parameters in order for it to be used by all existing and future projects in a given jurisdiction (rather than

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<sup>5</sup> Except in cases where deforestation is declining, and trends and/or models suggest a reference level that is below the historical average.

having it assessed in the context of each potential project that may use it)? What are the potential challenges and benefits of such an approach?

- 5) What should projects do when they are in a jurisdiction where the government reference level cannot meet the quality parameters? Should they fall back to the approach described under case (b) below?
- 6) What grace period should be given for existing projects (and those in the pipeline/close to validation) to transition to a nested approach where a qualified government reference level is available? One option is to allow projects to finish using their project baselines through the end of their [10 year<sup>6</sup>] reassessment period, or for five more years, whichever is sooner. Does this proposal seem desirable and workable? Note that projects may voluntarily nest sooner.

**For case (b) above, Verra is considering the following:**

- 1) In order to improve consistency in the determination of project baselines among different REDD methodologies, a set of standardized reference region selection criteria were proposed in the [VCS Version 4 public consultation held in 2018](#). The feedback received during that consultation strongly indicated that we should be moving projects towards integration within government reference levels and programs, instead of moving toward a standardized approach for selecting a project reference region. We are therefore considering whether Verra should advance an alternate approach to develop and improve the credibility of standalone REDD project baselines (i.e., where there is no qualified government reference level to use for nesting), for example by requiring all REDD projects derive their baseline from a jurisdictional reference level (developed specifically for project nesting) and its subsequent allocation. This would likely:
  - a) Drive alignment with eventual government programs while providing realistic near-term options for standalone REDD projects;
  - b) Help reduce the potential for a significant change to a project baseline when it is (eventually) required to nest with a government program;
  - c) Better promote conservativeness of project baselines; and
  - d) Require the same or less effort to establish a jurisdictional reference area and reference level (especially where multiple projects may work together and cost-share) compared to a project reference region.
- 2) The above proposal encourages either a) a project or group of projects in a given jurisdiction, or b) a third-party (e.g., Verra, an approved JNR expert or other qualified entity) to develop a

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<sup>6</sup> Verra is considering whether to reduce the time period for which projects set their baselines from 10 years. See question 8, under the key questions section below.

jurisdictional reference level which could then be allocated to projects using a standardized tool (see next section). Such reference level could be developed applying the *JNR Requirements* (or possibly other methods that are more accurate or more conservative). Such reference level would also need to meet a similar set of quality parameters as described under case (a) above. Once developed and validated, the reference level should be registered in the VCS database to be available for use by all existing and future projects in the jurisdiction.

- 3) If we decide to advance this approach, it would take precedence over, and eventually replace the baseline emissions quantification sections (and possibly impact other sections) of approved REDD project methodologies. To inform whether this proposed change will be feasible, Verra will undertake an analysis of currently approved REDD methodologies to assess workability and ensure such edits will not affect the overall quantification procedures of each methodology. Additionally (and on a longer timeframe) we will determine whether it is possible and beneficial to consolidate existing REDD methodologies into a single framework that covers all eligible activities, in order to promote consistent accounting of emission reductions across geographies and activity types, and to help streamline methodology choice for project proponents<sup>7</sup>.

#### Key Questions:

These questions represent some of the key issues that we are grappling with in the development of requirements for REDD project nesting. We welcome your inputs on these specific questions and in general, on the concepts presented above.

- 1) Does this make sense as a proposal for increasing conservativeness and eventual alignment of REDD project baselines with government programs and/or reporting? Is this the right direction for addressing inconsistencies in REDD project baselines (in order to facilitate continued standalone projects)? What are other possible approaches?
- 2) Should the *JNR Requirements* be used for the development of the jurisdictional reference level by projects? Should only the historical average option<sup>8</sup> be used for such development, as this may best promote alignment with what is most likely to be the future government reference level (e.g. one likely to be accepted under most results-based payment programs and existing/emerging carbon markets)? Or, should there be flexibility to include trend-based and/or adjustment options? What other quality parameters would need to be in place?
- 3) Are there circumstances under which it is not possible for projects to develop a qualified jurisdictional reference level in a given jurisdiction, and if so, what should projects do?
- 4) Should such a reference level preferably be developed at national scale unless otherwise justified? How might a subnational jurisdictional area be defined and justified?

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<sup>7</sup> If we determine that a consolidation of existing VCS REDD methodologies is possible and would be beneficial, we will additionally consider the financial impact of this consolidation on existing REDD methodology developers (e.g., related to the compensation paid to developers approved VCS methodologies as set out in Section 6.2 of the [VCS Program Guide](#), v4.0).

<sup>8</sup> Except in cases where deforestation is declining, and trends and/or models suggest a reference level that is below the historical average.

- 5) In the case where there is an existing government reference level, but where it is not qualified for nesting use, there may be continued accounting mismatches between project and jurisdictional levels. How could this be addressed?
- 6) Does the entire jurisdictional area need to be monitored (by projects) or is the monitoring of project areas sufficient? If only project areas are monitored, how could the jurisdictional reference level be updated over time?
- 7) As mentioned above, one alternative to having projects develop and register such a reference level is to have a third-party undertake this, which may reduce costs and potential duplicative or conflicting efforts by project proponents in the same jurisdiction. What are the pros and cons of this approach and are there other credible and workable approaches that should be considered?
- 8) Should Verra consider reducing the baseline reassessment period for projects from 10 years (e.g., to 5, 6 or 7 years) to ensure that projects are both evaluating the possibility to align with a government reference level (and its update frequency) and capturing changing drivers of deforestation and degradation more frequently?

## 2.2 REDD Project Standardized Allocation Approach

Once a reference level is selected or developed, per the above, Verra proposes that REDD project baselines would be determined by ‘allocating’ the reference level across the jurisdiction. Allocation options for REDD projects would be based on two primary scenarios:

- a) **Where a qualified government allocation approach already exists or where it is possible for the relevant project proponent(s) to work with the government to develop such an allocation approach; or**
- b) **Where such allocation approach does not exist and where it is not possible for the relevant project proponent(s) to work with the government to develop such an approach (e.g., where there is low government capacity and/or interest).**

**For the above cases, Verra is considering the following:**

- 1) An important limitation of a single reference level set for REDD across an entire jurisdiction is that it will not recognize the different dynamics and deforestation and/or forest degradation pressures at smaller scales. Therefore, if projects are required to apply an average jurisdictional deforestation rate, projects will choose the least risky lands as accounting areas (where expected deforestation or degradation is lower than the overall jurisdictional rate), effectively undermining incentives to address high-threat areas. Consequently, REDD project proponents will need to construct their project baselines by, for example, allocating the reference level to project areas according to the assessed level of deforestation or degradation risk.

We are proposing the jurisdictional reference level (i.e., emissions) should be allocated and not the results (i.e., emission reductions achieved) in order to ensure projects can be rewarded for real reductions achieved against this allocated reference level, even in the case where the jurisdiction as a whole underperforms or does not achieve net results (e.g., where the jurisdiction produces emission reductions that are less than the aggregate monitoring results at the project level, including any site-specific activities that may be part of a benefit sharing scheme). This is because site-specific achievement of emission reductions are still real, and driving finance to results will help ensure continued protection of forests.

- 2) We propose that projects should first check whether an allocation of the jurisdictional reference level to projects has been undertaken and approved by an appropriate entity (e.g., national or subnational government agency). Otherwise, projects are encouraged to work with the government to develop an allocation of the jurisdictional reference level (to project areas).

Where a government has established an allocation approach applicable to a project, the project should check whether the approach meets a set of high-level principles (to be) established by Verra (e.g., the allocation approach was developed in a transparent and equitable way; it ensures project baselines (and other site-specific activity baselines) cannot exceed the jurisdictional reference level; etc.). Where it does meet such principles, VCS projects may apply the government allocation approach. Where the government allocation approach does not meet such principles, projects may be required to apply a VCS standardized allocation tool and VCU issuances would capped per the output of such tool (described below).

- 3) Verra intends to hire a consultant to develop a VCS standardized allocation tool according to a set of high-level principles (to be released for the second public consultation in early 2020). Requiring use of such a standardized tool to spatially allocate deforestation and/or degradation may be a consistent and transparent way to undertake the allocation of a jurisdictional REDD reference level to projects. It could ensure environmental integrity is maintained at the jurisdictional level, and strengthen the viability of an existing (or eventual) REDD+ program by ensuring resources are delivered to forested areas under greatest threat.

In the context of the proposed allocation tool, Verra is also exploring whether and how jurisdictional and project level monitoring would need to align and be periodically reconciled, including in the context of jurisdictional underperformance<sup>9</sup>. Further details on monitoring and performance will be included in the second consultation, as described in the *Consultation Overview*.

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<sup>9</sup> Jurisdictional underperformance refers to the situation where a jurisdiction produces emission reductions/removals that are less than the aggregate monitoring results at the project level, including any site-specific activities that may be part of a benefit sharing scheme.

**Key Questions:**

These questions represent some of the key issues that we are grappling with in the allocation of a jurisdictional reference level for REDD project nesting. We welcome your inputs on these specific questions and in general, on the concepts presented above.

- 1) Current thinking is that a deforestation and/or degradation risk-based approach to allocating jurisdictional reference levels to projects is likely to be most appropriate, but we welcome other ideas. Are there other workable and credible approaches to nesting a REDD project baseline?
- 2) Should such a tool cap the maximum proportion of the jurisdictional reference level that could be allocated to any individual project, in order to further promote the conservativeness of project baselines?
- 3) Would it make sense for a third-party to assess (e.g., Verra could facilitate review by a Validation and Verification Body) the government allocation approach against VCS established high-level principles in order for it to be used by all existing and future projects in a given jurisdiction (rather than having it assessed in the context of each potential project that may use it)? What are the potential challenges and benefits of such an approach?
- 4) One alternative to developing and releasing a specific tool is to release only a set of principles, which would allow projects more flexibility in putting forward their own approaches (e.g., by developing a new tool, to be assessed under the VCS methodology process, or adding allocation methods to and revising an existing REDD methodology). Would this flexibility make more practical sense? How could robustness be ensured? Are there any drawbacks to this approach?
- 5) Once an allocation approach is in place, is leakage a necessary project-level consideration (i.e., jurisdictions should determine, and set out clear policies and procedures for how leakage from nested project activities is addressed to avoid the over issuance of project credits)? Or should leakage cease to be a concern with a qualified allocation approach and when jurisdictional monitoring is in place?

### 3 IFM PROJECT NESTING AND POTENTIAL DIVISION OF THE IFM CATEGORY

The IFM category as defined under the VCS Program includes activities that increase carbon sequestration and/or reduce GHG emissions in forests that are managed for wood products<sup>10</sup>. IFM activities that are associated with reduced degradation (e.g., logged to protected forest) will likely be included in government FRELS, and projects that include these types of activities would therefore be required to nest following the same requirements and guidance that are under consideration for REDD projects, as described above. IFM activities that are only associated with increased carbon

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<sup>10</sup> See Section A1.3, Appendix 1, *VCS Methodology Requirements*, v4.0.

sequestration (e.g., low-productive to high-productive forest) will likely not be required to fully nest at this time (see ARR Project Nesting section below for further details).

In order to ensure that projects with activities that are included in government FRELs nest appropriately, Verra is considering separating the existing IFM category into activities that primarily reduce emissions associated with degradation and activities that primarily increase carbon sequestration (if possible). Verra will be undertaking further analysis with respect to whether it is feasible to separate the IFM category in this way with respect to the existing VCS Program rules and requirements for IFM projects and methodologies, and all approved IFM methodologies. We plan to include the results of this analysis in the second consultation, as described in the *Consultation Overview*.

## 4 ARR PROJECT NESTING

Similar to sequestration-based IFM activities, many jurisdictional reference levels that have been developed or that are under development do not include ARR activities. Additionally, where such activities are included within government reference levels, we expect nesting to be simpler for ARR projects (compared to REDD projects) because, in most cases, the project baseline will be the same or similar to the jurisdictional reference level (e.g., non-forested land remaining non-forested land).

For these reasons, we anticipate nesting options for ARR projects to fall into two categories:

- 1) Where a relevant and qualified government reference level does exist, ARR (and sequestration-based IFM) projects will need to align their data (e.g., baseline carbon stock estimates and growth rates) and measurement methods to the extent feasible, to those that were used in the development of the jurisdictional reference level<sup>11</sup>. Alternatively, where a relevant and qualified allocation approach has been established by the government, ARR (and sequestration-based IFM) projects will need to apply such approach.
- 2) Where a relevant and qualified government reference level does not exist, ARR (and sequestration-based IFM) projects will not be required to develop a jurisdictional reference level, and may continue to use VCS project methodologies without needing to nest or align under a jurisdictional reference level.

### Key Questions:

- 1) Does the above approach generally make sense?
- 2) Are there any key considerations with respect to ARR project nesting that are not included above?

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<sup>11</sup> This may require collaboration with the jurisdiction to integrate project-level data (i.e., growth rates for specific species) into the jurisdictional measurement and monitoring system in order to promote consistency, or a mechanism to manage any data mismatches between scales.

## 5 GOVERNMENT CONSULTATION AND/OR APPROVALS

Since project nesting requires alignment with jurisdictional approaches, all REDD+ projects will need to engage with an appropriate government agency with regard to the development and/or use of a reference level (e.g., methods, sources of data and scope), its allocation (where relevant), associated monitoring system, and any other elements relevant to project nesting.

Experience in regulated and voluntary carbon markets has shown that obtaining specific approvals from governments is sometimes challenging, particularly where governments don't yet have the legal basis to grant approvals, and drafting, negotiating and passing the required legal instruments can take a long time. Governments may also be reluctant to issue approvals for political reasons, and requiring approvals can sometimes pose governance challenges. Therefore, a flexible approach seems warranted, where the government is at a minimum informed and has an opportunity to comment and engage to the extent it chooses to.

Where the relevant government has a legal framework in place to approve (or provide no-objection to) carbon project development, it must be followed. Where there is not a legal framework specifically for carbon projects, but for project development more broadly, it must be followed. Any government approval (or no-objection) should clarify specifically which reference level, allocation approach, monitoring system (and any other elements relevant to project nesting) should be used by projects, and over which time period, wherever possible.

Where no such legal frameworks are in place, rather than specifically requiring an approval or no-objection letter, direct notification and engagement of government through a public comment period, stakeholder consultation and/or other relevant approaches may be adequate alternatives.

Note that there may be additional approval requirements for accessing specific markets. For example, Article 6 may have additional approval requirements for accessing international markets regulated by the Paris Agreement.

### **Key questions:**

- 1) Does this seem an appropriate approach to government approvals? Are there other possible approaches or considerations not captured here?
- 2) In the case of 2.1 (b) and 2.2 (b), above (i.e., where projects are developing and applying a jurisdictional reference level and allocation tool in the absence of government action), is any form of government approval actually necessary? (Is this any different from what we would require of an existing VCS standalone project?)

## 6 NON-PERMANENCE RISK

Verra intends to make several updates to the AFOLU and JNR pooled buffer accounts and non-permanence risk tools to update project and program risk profiles (e.g., by requiring natural risk ratings to consider climate change impacts) and to address the transition of projects from standalone to nested. We expect that over time most REDD+ projects will transition to jurisdictional accounting (e.g., by nesting within a national or subnational reference level, or transitioning to a jurisdictional program). Verra intends to make updates to the requirements and procedures related to the AFOLU pooled buffer account, to reflect this transition. The second consultation will include proposed changes to the AFOLU and JNR pooled buffer accounts (and their associated rules and tools), as described in the Consultation Overview.

## 7 REDD+ SAFEGUARDS FOR NESTING

It is important to ensure that nested REDD+ projects align with the National Safeguards Information Systems under the UNFCCC and other safeguards requirements at the national level. Nested projects should assess what is required for their country's National Safeguards Information Systems given the national interpretation of the UNFCCC decisions on REDD+ safeguards. Projects should provide all such information, and must comply with all national and subnational policies, laws and regulations on safeguards.

Note that many of the social safeguards from the *Climate, Community & Biodiversity (CCB) Standards* (which align closely with the UNFCCC safeguard decisions) have been incorporated into the VCS Standard, v4.0, for all AFOLU projects under the VCS Program. Further, as many VCS REDD+ projects also apply the *CCB Standards*, they may find them useful to support such reporting on alignment with safeguards.

### Key questions:

- 1) Does this approach for reporting on safeguards make sense?
- 2) Are there other safeguards considerations for nested REDD+ projects that are not captured here?