

Date: 25 February 2022

To: The Subsidiary Body for Scientific and Technological Advice, UNFCCC

Mandate: FCCC/PA/CMA/2021/L.20 Para. 6(a) – (d)

Re: **Calls for submissions arising from the work in Glasgow:**  
Work programme under the framework for non-market approaches referred to in Article 6, paragraph 8, of the Paris Agreement

To Whom It May Concern:

In response to the invitation by the UNFCCC Secretariat, dated 25 January, 2022, re., submission of views, particularly on matters related to the *Work programme under the framework for non-market approaches referred to in Article 6, paragraph 8, of the Paris Agreement*, we hereby submit to your attention our views on the said matter in the form of the attached position paper, *Nature-based Solutions to Climate Change: A Rocha Worldwide Family Position*.

A Rocha is a Christian faith-based nature conservation organisation seeking to live out a faith by undertaking scientific research on biodiversity, environmental education and community-based conservation projects, with locally-driven programmes in over 20 countries. A Rocha International, the umbrella body of our global family of projects, is an accredited Observer Organisation at UNFCCC. We are also a long time member of the International Union for Conservation of Nature (IUCN), and a participating organization at the Convention on Biological Diversity (CBD).

We believe the subject matter of our position paper represents an important yet insufficiently addressed aspect, namely, nature-based solutions to climate change, in the framework for non-market approaches as laid out in the Work Programme document ([https://unfccc.int/sites/default/files/resource/cma2021\\_L20E.pdf](https://unfccc.int/sites/default/files/resource/cma2021_L20E.pdf)), particularly 6(a) and 6(b), and chapter II of the annex.

As stated in the opening paragraphs, the attached position paper

“sets out the general position on Nature-based Solutions to climate change (NbS) of the A Rocha worldwide family. The paper is primarily intended as a contribution to national and international policy development and decision-making by A Rocha organizations engaging with their national representatives in advance of and during the 26th Conference of Parties (COP26) to the United Nations Framework Convention on Climate Change (UNFCCC).

In addition, we hope it will be useful for informing other groups within civil society, including churches and para-church organizations, about the subject of NbS and how they can deploy them appropriately.

The paper is based on our understanding of the relevant science, our practical experience of nature conservation in a context of climate change, and our understanding of the broad political and economic context in late 2021.” [page. 4]

In the paper we propose six principles for implementing nature-based solutions to climate change, including:

- We support and encourage the use of NbS as defined by the IUCN to address climate change and habitat and species loss.
- Governments must be consistently clear that NbS are not a substitute for the rapid phase out of fossil fuels.
- NbS should be implemented with the free, prior and informed consent of Indigenous Peoples and local communities in a way that respects their cultural and ecological rights through ensuring transparency, inclusion and equity.
- NbS for climate action must also deliver for nature and not just be delivered by nature to ensure NbS are not detrimental to nature and people.
- NbS, therefore, should be designed and implemented to achieve measurable positive outcomes to the climate and nature as well as providing health, wellbeing and economic opportunities for people.
- NbS for the specific purposes of combating climate change, are themselves no substitute for a comprehensive international drive to protect the Earth’s remaining intact ecosystems

Furthermore, we suggest a five-part proposal to governments and policy-makers for their consideration:

- All governments should ensure that NbS, as defined by IUCN, are included in their Nationally Determined Contributions (NDCs).
- Enact Article 6 of the Paris Agreement to support tightly regulated offset markets.
- Harmonize goals and mechanisms of the climate and biodiversity conventions [i.e. UNFCCC and CBD] for NbS.
- Ensure free, prior and informed consent by Indigenous communities and local communities for NbS.
- Promote the potential of NbS to create good quality and sustainable livelihoods.

Please refer to the paper for our detailed rationale and explanation.

The paper, as attached, can also be found here: <https://www.arochoa.org/wp-content/uploads/2021/10/Nature-based-Solutions-to-climate-change-A-Rocha-worldwide-family-position-October-2021.pdf>

In case there is any question, please kindly contact Mr. Samuel Chiu (samuel.chiu@arochoa.org), our liaison and Designated Contact Point at UNFCCC.

Thank you very much!

A Rocha International