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METHODOLOGY

Consultation Digest - Executive Summary

Table of *Contents*

Executive *Summary*

INTRODUCTION

ERS is pleased to share this summary of feedback received during the Public Consultation on the inclusion of Secondary Forest Growth in the Ecosystem Restoration Standard (ERS). Held from February 7 to March 8, 2025, this consultation focused on proposed revisions to Methodology M001 to clarify the definition of degraded lands and formally recognise secondary forest growth resulting from restoration efforts.

The proposed updates introduce clearer definitions, expand eligible project activities, and refine greenhouse gas (GHG) quantification to credit only net carbon removals through a conservative dynamic baseline approach. By distinguishing between active restoration and passive conservation interventions, the revised methodology aims to more accurately reflect the full range of ecosystem recovery pathways while maintaining methodological integrity and minimising the risk of over-crediting.

We would like to thank all participants who contributed their time and insights. Your feedback is essential in helping us ensure that the Standard remains practical, transparent, and scientifically robust.

This digest aims to provide a clear and concise overview of the feedback received and to inform stakeholders of the main themes and considerations that emerged.

How clear is the definition of secondary forest growth in the revised M001 methodology? What additional clarification or guidance would help in understanding secondary forest growth?

Questions 1 and 2

Stakeholders highlighted several areas where further clarification would be beneficial. Some requested a clearer explanation of what is meant by "vegetation has been diminished," noting that this sentence could be open to interpretation. Others suggested that the term “canopy” might not fully capture relevant forest characteristics and recommended using “structure” instead, which could better account for ecological complexity.

There were also suggestions to revise phrasing to avoid ambiguity about the onset of regrowth. Additionally, stakeholders questioned the focus on “biomass” regrowth, suggesting that referring more broadly to “vegetation” could be more accurate, as increases in biomass are a result rather than the process itself. Finally, some feedback pointed out that practical restoration measures, such as the removal of weeds and climbers, should be acknowledged, as these can influence both forest recovery and remote sensing interpretations (e.g., misleading canopy cover from satellite imagery).

ERS response

We welcome the feedback on the clarity and terminology used in describing secondary forest growth. As part of our ongoing commitment to precision and clarity, we will refine key definitions, including a clearer articulation of what is meant by “diminished vegetation.”

Suggestions around phrasing and terminology have sparked valuable internal discussions that will inform upcoming revisions to ensure both technical accuracy and practical relevance.

Finally, while not part of the definition itself, we acknowledge the importance of common restoration practices—such as managing weeds and climbers—in influencing forest recovery and interpretation via remote sensing. These will be integrated more clearly into our carbon accounting methodologies.

To what extent do you believe that crediting secondary forest growth as such aligns with the principles of additionality and permanence as defined in the ERS Programme and M001 methodology?

Question 3

The stakeholders expressed strong support for ERS's approach to crediting secondary growth under the principles of additionality and permanence as defined in the ERS Programme and M001 methodology. They noted that their own experience with restoration aligns with ERS's concept of a dynamic baseline, and considered the definition of additionality in this context to be fair. They also acknowledge that permanence is inherently subjective but agree that consistent outcomes over 30 years are a reasonable benchmark.

However, the stakeholders also highlighted two potential challenges:

- **Additionality:** Secondary growth interventions may occur at relatively low cost, raising questions about the perception of additionality when significant expenditures are not involved.

- **Permanence:** The absence of alternative value chains beyond carbon revenues could impact long-term permanence, as there may be limited economic incentives for communities previously engaged in activities causing degradation.

ERS response

ERS thanks the stakeholders for their thoughtful and constructive feedback regarding their alignment with ERS principles of additionality and permanence.

Regarding additionality, the M001 methodology emphasises not only financial investment but also the active interventions and changes in land management practices that enable forest regeneration. Financial barriers must still be assessed as part of the barrier analysis conducted during the Project Design Phase.

Regarding permanence, Projects that include secondary forest growth remain fully integrated into the ERS Programme and M001 methodology and must comply with all requirements concerning the promotion of sustainable livelihoods and the development of alternative income streams. These measures are essential to reinforcing the long-term permanence of restoration efforts and ensuring that local communities are supported beyond carbon revenue streams.

How effective is the ERS dynamic baseline approach in accurately capturing secondary forest growth trends?

Question 4

Similarly, the stakeholders expressed strong support for ERS's dynamic baseline approach, recognising it as an essential effort to include secondary degraded young forests in carbon credit mechanisms. They praised the approach for accounting for fluctuations in carbon removal rates through robust mathematical equations, with appropriately selected parameters that make it easier to estimate carbon removal over the project crediting period.

While the stakeholders generally supported the use of control plots based on relevant indicators, they raised a potential concern for Projects that are already well-established. In such cases, the control plots might not reflect the initial conditions prior to project implementation and could be located in areas with less environmental pressure. This could result in overly conservative estimates of carbon sequestration, potentially underestimating the actual carbon removals generated by these Projects.

ERS response

ERS appreciates the stakeholders' feedback regarding the use of control plots in the dynamic baseline approach. We value the importance of selecting appropriate control plots to ensure accurate carbon sequestration estimates.

The methodology for selecting control plots has already been refined as part of the upcoming version 1.2 of our M001 methodology, which employs a range of ecological and environmental indicators to ensure comparability between the restoration area and the control plots.

While we understand the concern regarding the potential for control plots in advanced projects to reflect areas with less degradation, it is important to note that

control plots represent what the restoration area might have looked like in the absence of prior disturbance. ERS will continue to monitor and refine the approach as necessary to ensure its effectiveness in capturing the true benefits of restoration.

Do you find the exclusion of avoided emissions from secondary forest growth crediting adequate to address concerns about over-crediting? Why or why not?

Question 5

The stakeholders' feedback acknowledged that ERS's decision to exclude avoided emissions from secondary growth crediting addresses concerns around potential over-crediting and aligns with the goal of generating removal-based credits. Stakeholders stated that this approach may help prevent some controversies linked to unverifiable counterfactuals.

However, concerns were raised that by excluding avoided emissions, ERS may overlook the significant past and ongoing efforts of conservation initiatives aimed at preventing deforestation and protecting biodiversity. Some stakeholders noted that while the focus on removals is appropriate given the large-scale need for restoration financing, it is important to recognise that threats to forests are dynamic and not linear — meaning that forest regrowth could face increasing threats over time. As a result, the exclusion of avoided emissions might prevent the full quantification of genuine carbon gains in some cases, especially in landscapes with fluctuating land-use pressures.

Overall, while the exclusion was largely seen as a prudent measure to ensure environmental integrity and avoid over-crediting, it was noted that this approach may also limit the recognition of certain real-world conservation benefits.

ERS response

ERS thanks stakeholders for their thoughtful feedback on the exclusion of avoided emissions from secondary forest growth crediting. We appreciate the recognition that focusing on removals helps to reduce the risk of over-crediting and maintains the environmental integrity of the ERS Programme.

At this stage, ERS considers it preferable to adopt a conservative approach by excluding avoided emissions from secondary forest growth. This decision helps to maintain transparency and ensures that credited outcomes are based on directly measurable carbon removals, reducing reliance on unverifiable counterfactual scenarios.

We acknowledge that avoided emissions play an important role in forest conservation and biodiversity protection. ERS intends to address these efforts through the development of a separate methodology more specifically focused on conservation outcomes. Such a methodology would include appropriate safeguards, additionality assessments, and permanence requirements tailored to the specific risks and characteristics of avoided deforestation activities.

ERS remains committed to evolving its standards and methodologies to support both restoration and conservation efforts while maintaining the highest levels of credibility and impact.

Do you believe excluding avoided emissions credits adequately addresses leakage risks for secondary forest growth projects? If not, what alternative approaches would you recommend?

Question 6

Stakeholders generally agreed that the exclusion of avoided emissions credits is a simple and effective way to reduce the complexity and controversy associated with leakage risks in secondary forest growth projects. One stakeholder noted that this approach avoids long-standing debates that have slowed progress in forest carbon initiatives.

However, some stakeholders highlighted that the exclusion of avoided emissions does not, in itself, directly address leakage risks, which occur outside project boundaries and must be monitored separately. Others pointed out that leakage risks depend heavily on project-specific factors, such as the types of threats present, the number and placement of control plots, and their geographical distribution. It was suggested that projects should be required to demonstrate how they intend to manage or mitigate potential leakage linked to their activities, recognising that leakage can occur far from the project site and is not easily captured through control plots alone.

ERS response

We confirm that leakage is calculated, monitored, and mitigated for secondary growth activities under the M001 methodology, which includes specific requirements for the identification of leakage risks, quantification of leakage, where applicable, and the implementation of mitigation measures.

It is important to clarify that the exclusion of avoided emissions credits addresses concerns related to *market leakage,* which is particularly relevant when crediting avoided emissions. All other leakage risks, including activity-shifting leakage, are managed according to the established requirements in M001.

Are there additional measures or safeguards you think are needed to ensure permanence in secondary forest growth crediting?

Question 7

Stakeholders provided several suggestions to strengthen the permanence of secondary forest growth Projects. It was emphasised that promoting sustainable livelihoods is critical — for example, by providing improved cookstoves and sustainable fuel alternatives to communities that rely on forests for energy. In addition, encouraging the planting and use of fast-growing species, coupled with developing bio-economies around these resources, was highlighted as a way to reduce pressures such as illegal logging.

Stakeholders also pointed to the importance of enhancing biodiversity as a safeguard for long-term ecosystem resilience. Lastly, it was recommended that ERS clarify the required duration for permanence commitments (if not already specified) and require the development of a sustainable finance strategy for projects, to ensure long-term viability beyond carbon revenues alone.

ERS response

ERS thanks stakeholders for their valuable suggestions regarding measures to enhance the permanence of secondary forest growth projects.

We recognise the critical importance of promoting sustainable livelihoods to support long-term project success. M001 already requires strong engagement with local communities. Projects must identify and implement interventions that meet the needs and aspirations of local stakeholders.

Biodiversity is also a key component of the ERS Programme. Our safeguards framework, as well as the "Ecological Recovery" pillar of M001, includes specific

requirements to ensure that Project activities promote biodiversity and ecosystem integrity alongside carbon sequestration goals at all levels.

Finally, regarding permanence, secondary growth Projects are subject to the same permanence requirements as other activities under M001, including a minimum crediting period of 40 years. In addition, ERS is introducing, through the v1.2 of M001, a requirement to monitor projects for loss events for a total of 100 years after the start of the crediting period.

Do you believe that secondary forest growth effectively complements restoration activities in achieving ecosystem recovery?

Question 8

Stakeholders broadly agreed that secondary forest growth can play a vital role in achieving ecosystem recovery. Feedback highlighted that, based on long-term field experience and data, secondary forests have a strong capacity to regenerate and support ecosystem balance when threats are removed and conservation is ensured. Additionally, they mentioned that while removing threats is often a prerequisite for successful restoration, the distinction between "restoration" and "secondary growth" could be clearer. They suggested that both fall under a broader restoration continuum—from passive regeneration to active intervention—and that framing restoration in terms of threat removal followed by a range of restorative activities may provide greater clarity.

ERS response

ERS appreciates the thoughtful feedback on the role of secondary forest growth within broader restoration efforts. ERS always recognised the importance of framing restoration as a continuum that includes both passive and active approaches. Secondary forest growth activities, once integrated within the M001 methodology, are a form of ecological recovery that begins with halting harmful activities and may progress toward more structured interventions as needed. We will continue to ensure that the framing of restoration activities within the ERS Programme reflects this continuum clearly.

Beyond carbon sequestration, what other co-benefits (e.g., biodiversity, water regulation) do you see as key to secondary forest growth efforts?

Question 9

Stakeholders highlighted a range of important co-benefits associated with secondary growth beyond carbon sequestration. Biodiversity conservation emerged as a central theme, with specific references to species recovery, habitat connectivity, and increases in local wildlife diversity. Respondents also noted positive impacts on water availability and community engagement, underscoring the broader ecological and social value of restoration when threats are effectively managed and regeneration is supported through appropriate measures.

ERS response

ERS welcomes the recognition of the diverse benefits delivered through secondary forest growth. These outcomes align closely with our mission to empower individuals and organisations to restore the natural world through a high-integrity certification framework.

Our three-pillar approach ensures that ecosystem recovery, and community well-being are embedded as priorities at the same level as carbon sequestration. Through ERS robust safeguards, and the ecological recovery requirements set out in the M001 methodology, ERS-certified Projects are designed to deliver measurable improvements in both ecological recovery as well as sustainable livelihoods. These benefits are essential to the long-term success and integrity of restoration initiatives, and we remain committed to strengthening them through our evolving Standard.

Do you see any challenges in implementing secondary forest growth crediting in the field? Is there any feedback or concerns you'd like to share about the integration of secondary forest growth into the M001 methodology?

Questions 10 and 11

Stakeholders highlighted several implementation challenges and areas for clarification regarding the integration of secondary growth into the M001 methodology. One common concern was the capacity of implementing partners to carry out restoration activities effectively, particularly in degraded secondary forests where scientific planning and sustained field presence are required. Building local capacity and developing a strong network of trained restoration practitioners was seen as essential to scaling up efforts.

Specific suggestions included recognising field-based interventions such as the removal of weeds and climbers as legitimate restoration activities that support secondary forest recovery. Feedback also raised the need for clear distinctions between carbon pools within projects, and for greater attention to compensating for the opportunity costs associated with halting degrading practices. Additionally, respondents stressed the importance of securing long-term permanence through mechanisms beyond carbon revenues, such as livelihood diversification, and reiterated earlier concerns around clearly articulating the conceptual boundaries between restoration activities and secondary forest growth within the methodology.

ERS's response and improvements

We appreciate the practical insights shared regarding implementation challenges. The ERS Programme and M001 methodology are designed to allow scopes that can accommodate a wide range of field conditions and intervention types. Developers should always define context-appropriate measures, including the removal of weeds

and climbers, as part of their strategy to reduce degradation and support secondary growth.

Furthermore, ERS reiterates its strong emphasis on the Ecological Recovery and Livelihood pillars. Requirements related to sustainable livelihoods, local participation, and long-term benefit-sharing are embedded within the ERS safeguards and the M001 to ensure that Projects reflect the needs and aspirations of the communities and go beyond carbon revenues.

With regard to carbon pools, ERS does not distinguish removals arising from restoration activities versus those from secondary forest growth. All removals are treated as part of a unified restoration effort to maintain methodological simplicity and integrity, and to avoid unnecessary complexity that could hinder implementation or verification.

We continue to welcome feedback that strengthens clarity and field effectiveness, and we remain committed to supporting practical, scalable restoration solutions.

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