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Introduction

- This section should clearly define what Land degradation means.

LDN standard 1

- This section needs clear definitions of the different types of management that projects can undertake (e.g. restoration, afforestation etc.)
- There should be some recognition of the time required for restoration projects to have an impact on ecosystem services and biodiversity.
- Under the Convention on Biological Diversity ecosystems are considered a part of biodiversity. Therefore, there is no need for the phrase ‘biodiversity ecosystems and ecosystem services’ which can instead be phrased as ‘biodiversity and ecosystem services.’
- There should be some reference to what kind of biodiversity projects will aim to restore/manage. For example, there have previously been concerns that REDD+ may consider oil palm plantations as forests that can be used to claim carbon credits, despite the fact that these plantations are non-native and seriously endanger biodiversity in SE Asia. Equally, invasive species can provide many ecosystem services but are not necessarily very good for native biodiversity. As such, the clarity of this section needs to be improved. Does the fund aim to increase biodiversity of all kinds, or just native biodiversity?
- This paragraph recognizes that biodiversity underpins ecosystem services. However, this does not always mean that more species = more ecosystem services. For provisioning services in particular the majority of an ecosystem service may be supplied by a single species. Though biodiversity and ecosystem services are linked, projects should not assume that improvement of one will necessarily result in improvement of the other.
- I am not sure if this is relevant here, but if the aim of projects is to improve biodiversity and ecosystem services, what baseline will be used to measure this? In heavily degraded ecosystems almost any conservation management will improve the status of biodiversity. Projects should have explicit targets which they set for biodiversity and ecosystem services.

LDN standard 2

- This section should make a mention of language, which is surely a feature of cultural heritage.
- The section should also define clearly what cultural heritage means.

LDN standard 6

- Part of this section states that: ‘...For these reasons, involuntary settlement should be avoided. Where involuntary settlement is unavoidable, however, it should be minimized...’ To me this suggests that projects should try to avoid involuntary settlement, unless this is unfeasible. However, what this means from project to project will be very different. This lack of clarity could

easily allow projects to carry out widespread involuntary resettlement on the basis that it was 'unavoidable.' This statement need to suggest that involuntary settlement is only acceptable in a predefined set of circumstances.