

October 29, 2018

Mary Nichols  
Chair, California Air Resources Board  
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We, the undersigned organizations, urge the California Air Resources Board to reject consideration of the Tropical Forest Standard (TFS), which would lay the groundwork for accepting Reduced Emissions from Deforestation and Degradation (REDD) offset credits into California's carbon trading system.

Preservation of tropical forests is critical for conserving biodiversity; providing homes, cultural resources, and livelihoods for millions of people; and for protecting our global climate. But the TFS proposed by the California Air Resources Board is deeply misguided, would undermine the integrity of California's climate policies, and cause or perpetuate human rights abuses.

### **Carbon offsets perpetuate pollution**

Opening the floodgates to tropical forest offsets encourages polluters to avoid reducing their emissions. At best, offsets create *zero* emissions reductions. Under California's carbon trading system, it actually enables an increase in industrial emissions by a far greater amount than otherwise allowed by AB32, California's landmark climate change law. This has significant health impacts for fence-line communities in California – the majority of whom are people of color -- who live near major greenhouse gas (GHG) emitters. When refineries and other facilities are allowed to continue emitting greenhouse gases, they also emit noxious co-pollutants, like particulate matter, nitrogen oxide, and other carcinogens. Thus, carbon offsets perpetuate pollution hotspots and environmental racism, which should be of grave concern to the ARB as an air pollution regulator.

### **Tropical forest carbon offsets pose risks to Indigenous Peoples and human rights**

The Tropical Forest Standard has been created as a preliminary step to allowing REDD carbon offset credits into California's carbon trading system. REDD projects have a well-known and recorded history of contributing to illegal actions, violence, forced decision-making, land grabs, and other human rights abuses for many Indigenous groups and forest-dwelling people around the globe. Notably, these negative impacts tend to be associated with jurisdictions with weak governance, unclear land tenure laws, and political instability – characteristics common among many of California's potential partner jurisdictions, including in Brazil, Nigeria, and Indonesia. Although the TFS tries to address these concerns, ultimately REDD projects sow division amongst Indigenous Peoples in a context of intimidation, coercion, and grossly disproportionate economic power exerted by governments and corporations. It is practically impossible for ARB to monitor international forest offset programs in foreign jurisdictions to prevent these abuses and ensure compliance with the TFS's human rights standards.

### **Tropical forest conservation projects are not suited for carbon offset credits**

While many problems exist with offsets in general, there are significant issues unique to REDD projects that make them broadly unfit to offset industrial emissions. Many of these problems are outlined, although not adequately addressed, in the TFS's environmental impact assessment, including the problems of permanence and non-additionality. Simply put, tropical forest carbon offsets allow *certain, permanent* harm (the emission of more GHGs from industrial sources) in exchange for hoped-for, *uncertain, temporary* carbon sequestration. Because these problems are so intractable, no

jurisdiction in the world accepts REDD credits into its compliance market. Accepting REDD carbon offset credits would not only undermine the integrity of California's climate policy, but it would violate AB32's requirement that all emissions reductions be "real, additional, quantifiable, permanent, verifiable and enforceable."

Because of the reasons stated above, we strongly urge the ARB to reject consideration of the Tropical Forest Standard (TFS), and any attempts to accept REDD credits into California's carbon trading system.

If you have any questions, please contact Michelle Chan at [mchan@foe.org](mailto:mchan@foe.org).

Sincerely,

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ARA, Germany  
Asia Pacific Forum on Women, Law and Development, Thailand  
Associação 11 de Junho, Brazil  
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Biofuelwatch, International  
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Center for Environment/Friends of the Earth Bosnia and Herzegovina  
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Friends of the Earth Canada  
Friends of the Earth England, Wales and Northern Ireland, United Kingdom  
Friends of the Earth Finland  
Friends of the Earth Ghana  
Friends of the Earth International  
Friends of the Earth Spain  
Friends of the Earth U.S.  
Global Forest Coalition, International  
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groundWork, South Africa  
Heinrich Boell Stiftung North America  
Indian Social Action Forum – INSAF, India  
Institute for Agriculture and Trade Policy, United States  
Justiça Ambiental/Friends of the Earth Mozambique  
Les Amis de la Terre - Togo  
Local Clean Energy Alliance, United States  
Milieudefensie- Friends of the Earth Netherlands  
New York Climate Action Group, United States  
NGO Forum on ADB, Philippines

No REDD in Africa Network (NRAN), Africa-wide  
NOAH/Friends of the Earth Denmark  
Otros Mundos A.C., Mexico  
Passionist Center for Justice Peace and Integrity of Creation (PC-JPIC), Philippines  
Pastoral de la Tierra del Vicariato Apostólico de Yurimaguas, Perú  
Rainforest Action Network, United States  
Rainforest Resource and Development Centre (RRDC), Nigeria  
Re:Common, Italy  
Seventh Generation Fund for Indigenous Peoples, United States  
Social Development Integrated Centre (Social Action), Nigeria  
Texas Drought Project, United States  
The Corner House, United Kingdom  
Third World Network, Malaysia  
TierrActiva, Peru  
WRM - World Rainforest Movement, Uruguay  
Youths and Environmental Advocacy Centre (YEAC), Nigeria

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