

CARB Board Chair Mary Nichols

California Air Resources Board

1001 I Street, Sacramento, CA 95814

 August 29, 2019

Dear California Air Resource Board,

As a California-based foundation with a mission to protect and defend bio-cultural diversity, a longstanding Andes/Amazon regional program and commitments to grantee partners in tropical forest regions worldwide, we write to formally reject the Tropical Forest Standard, and not just the “revised” version but the very concept of it.

We implore California regulator ARB to NOT endorse its Tropical Forest Standard (TFS) at the forthcoming September 19-20th hearing. Sector-based REDD offsets lack environmental and social integrity and fail to address the root causes of deforestation.[[1]](#footnote-1)

In the face of the climate crisis, and as a state with one of the largest sources of dirty oil and worst air quality in the nation, signing off on a policy that provides offsets to polluters, and which does not mandate or respect Free Prior and Informed Consent of the Indigenous Peoples whose territories are directly affected by this policy, is a deceiving proposition.

Offsets are not reductions as the many PhD scholars standing firmly against the TFS have made clear through their extensive research.[[2]](#footnote-2) Rather, offsets offer extractive industries (oil, gas, mining, energy, aviation) and other polluters a cheap way to buy their way out, instead of reduce emissions at the source.[[3]](#footnote-3)

REDD is a globalist bandwagon idea that is resulting in human rights violations and land grabs.[[4]](#footnote-4) In addition to these abuses, and after being heavily promoted for over a decade, deforestation only continues to go up.[[5]](#footnote-5) The market-based strategy that panders to the interests of industry (i.e. buy offsets instead of cutting emissions) is not working. REDD is neither effective or ecologically prudent. We have come to see REDD as a grave distraction in this era of reckoning we are living in.

What is actually needed is to hold polluters accountable, protect Indigenous Peoples rights to their territories, divest from (the heavily subsidized) extractive industries (and/or stop subsidizing and regulate these extractive industries), and invest in an economy that fosters life, not waste and destruction. We speak from experience in encouraging divestment from the fossil fuel industry. Years ago, Swift Foundation divested from all oil and gas in our endowment. We have detailed NO BUY guidelines that articulate an even more comprehensive list of what we will not invest in to stay in integrity with our values. We are also proactive in making investments towards a Just Transition and the making of a regenerative economy.[[6]](#footnote-6)

For further background on our position on carbon markets, please read out formal Open Letter, [*What we mean when we say “Supporting Forests, Rights, and Lands for Climate*](https://swiftfoundation.org/open-letter-by-swift-foundation/)*.”[[7]](#footnote-7)*

To take true leadership, the State of California needs to dramatically reduce emissions at source, including both consumption and import of fossil fuels; anything short of this is careless. The recent Last Chance Alliance petition, of which we alongside hundreds of other CA-based organizations are signatories of, is a far more common sense and legitimate proposal to protect the air we breathe and take real action on the climate crisis. We call upon Governor Newsom and the State of California to take the following calls to action: 1) Stop new fossil fuel projects, 2) Drop existing production, 3) Roll out strict setback limits. And REJECT the TFS. Do not create more public infrastructure to let the extractive industries continue with business as usual at this pivotal moment in history.

If you have any questions please contact me at sonja@swiftfoundation.org. Thank you.

Respectfully,

Sonja Swift, Interim Executive Director on behalf of the Board of Directors.

1. For a thorough critique and analysis of the failure of environmental markets, see: <https://greenfinanceobservatory.org/2019/05/23/second-policy-report-50-shades-of-green-part-ii-the-fallacy-of-environmental-markets/> [↑](#footnote-ref-1)
2. https://redd-monitor.org/2018/11/20/california-postpones-decision-on-tropical-forest-standard-until-april-2019/ [↑](#footnote-ref-2)
3. https://www.biofuelwatch.org.uk/2019/california-letter/ [↑](#footnote-ref-3)
4. As one recent example, see: <https://news.mongabay.com/2018/03/report-finds-projects-in-drc-redd-laboratory-fall-short-of-development-conservation-goals/> [↑](#footnote-ref-4)
5. https://features.propublica.org/brazil-carbon-offsets/inconvenient-truth-carbon-credits-dont-work-deforestation-redd-acre-cambodia/ & “Wieckowski cited deforestation rates rising by 83% in the Brazilian state of Acre from 2017 to 2018, despite the jurisdiction having a large-scale forest offset programme in place” (https://redd-monitor.org/2019/08/22/letter-from-california-senator-bob-wieckowski-i-write-to-express-our-strong-opposition-to-the-air-resources-boards-tropical-forest-standard/) [↑](#footnote-ref-5)
6. https://swiftfoundation.org/investments/ [↑](#footnote-ref-6)
7. https://swiftfoundation.org/open-letter-by-swift-foundation/ [↑](#footnote-ref-7)