

Questions posed to ARB Executive Officer Richard Corey, with responses

We'd like ARB's input on the proposed changes we've received from EDF.

The changes appear to be feasible. Some supporters may have questions about the additional stringency provided by the revisions, and we would need to conduct additional public process on our end, likely through an additional public comment period, on any revised language.

Is it possible to increase the buffer pool beyond 10% to account for new research that suggests higher leakage rates for forestry offsets than previously assumed?

The forest buffer approach is an important mechanism for helping to ensure permanence. I believe an increase in the buffer pool slightly beyond 10% would be feasible. We would need to discuss with staff on any specific percent increase as well as put it out for public comment, but believe that a modest increase, if technically justified, if could work.

Would it be possible to require jurisdictions that authorize these credits to do periodic, random audits?

The TFS already requires third-party, independent verifications of the tropical forest jurisdiction's program, including with site audits, on an ongoing basis. I believe including a specific mandate for audits by partner jurisdictions as part of a voluntary TFS is not feasible. However, I expect such audits could be a condition of any partner jurisdiction employing the TFS. With that said I could see the value of including language that further underscores the importance of such due diligence, including site visits, by the partner jurisdiction/program.

What would the process be if an authorizing jurisdiction realizes that a jurisdiction participating in TFS violated part of the standard? What recourse would the jurisdiction have?

The standard is designed to provide transparency and verifiability of a tropical forest jurisdiction which voluntarily seeks to meet the requirements in the standard. Meeting the standard would require implementation of legal and policy structures that meet the safeguards requirements, MRV requirements, and all other elements of the standard. If a partner jurisdiction/program recognizes the tropical forest jurisdiction as meeting the standard and chooses to work with that tropical forest jurisdiction, it has a strong recourse if the tropical forest jurisdiction later is found by the partner jurisdiction to no longer meet the standard. This could include ending the partnership, canceling any invalid instruments (if there were instruments involved), triggering the buffer pool if necessary to ensure environmental integrity, etc. And, local communities in the tropical forest jurisdiction would also have recourse under the legal/policy structure that was developed/enhanced in order to meet the standard.