

Dear Members of the California Air Resources Board,

As Members of the European Parliament, we are addressing this letter to you regarding the **proposed California Tropical Forest Standard (TFS)**, which you have been elaborating and are proposing to endorse. Having noted the serious concerns about the impacts of the TFS on local communities and global climate action, in this letter, we describe our own concerns with the proposed standard, and we urge you to reject it.

We share your sentiment regarding the state of forests, particularly primary tropical forests, and believe that curbing deforestation is a crucial element in fighting the global climate crisis. However, the most effective way of doing this is to address the underlying factors driving deforestation, including through supply chain regulations. In the case of tropical forests, these drivers include large-scale crop agriculture and cattle ranching. **The European Union has taken steps to promote the conservation of forests through non-market approaches**, including through its [Forest Law Enforcement, Governance and Trade program](#), and the proposed [EU Action Plan on Deforestation and Forest Degradation](#).

Moreover, **the EU has never allowed the use of forestry credits under its Emissions Trading System due to concerns about their environmental integrity**. Starting in 2021, the use of all international carbon offset credits towards Europe's climate targets will be banned, as the EU strives to meet its Paris Agreement's objectives through domestic emission reductions.

We have the following **concerns about the TFS**:

- (1) **It could open the door for (more) forestry offsets in the global aviation offsetting scheme (CORSA)**: As a standard for forest-based crediting mechanisms, the TFS could contribute to legitimizing the use of forestry credits under the Carbon Offsetting and Reduction Scheme for International Aviation (CORSA). This is a great source of concern to us, EU policymakers, as it would open the door for one of the most controversial types of international carbon credits for use by European airlines, despite the EU having taken steps to consistently ban such credits from use towards our own climate targets.
- (2) **It doesn't do enough to prevent double counting of emission reductions**: the TFS only requires a description of how to avoid that emission reductions are counted towards multiple objectives, leaving the whole matter open for interpretation. This is a major climate loophole given the lack of clarity and the absence of an international agreement to define double counting, let alone identify provisions to avoid it.

- (3) **It does not adequately prevent a situation where** avoiding deforestation in one area leads to increased deforestation in another. This displacement of emissions from forest-conservation programs is extremely difficult to measure, let alone prevent or remedy.
- (4) **It cannot guarantee permanent emission reductions:** the measures proposed under the TFS' permanence criteria require a relatively stable and predictable political and economic context over an entire century in order to be effective. We are concerned that this is not a realistic expectation, as shown for example by recent political developments in Brazil, including the rollback of conservation policies aimed at reducing deforestation in the Amazon forest.
- (5) **It could lead to human rights violations of local communities:** This has been the case in the past for certain forestry projects, which led to the displacement of indigenous communities. Representatives of indigenous people have already voiced strong concerns about the TFS, and adopting it in spite of these warnings would go against the precautionary principle.

We believe that adopting the TFS would water down climate ambition in California, the EU, and globally, as it would constitute a further step towards allowing regulated entities, such as companies or airlines, to replace real emission reductions with the purchase of credits that at best do little to address climate change and at worst lead to increased emissions and human rights violations on the ground. We therefore urge you to reject the TFS and consider instead other measures to curb deforestation rates, especially by directly addressing the drivers of deforestation.

Sincerely,

Jakop Dalunde, Member of the European Parliament, Greens-European Free Alliance Group, Sweden

Bas Eickhout, Member of the European Parliament, Greens-European Free Alliance Group, Netherlands

Gerben-Jan Gerbrandy, Member of the European Parliament, Alliance of Liberals and Democrats for Europe (ALDE) Group, Netherlands

Julie Girling, Member of the European Parliament, European People's Party (EPP), United-Kingdom

Sirpa Pietikäinen, Member of the European Parliament, European People's Party, Finland

Marc Tarabella, Member of the European Parliament, Progressive Alliance of Socialists and Democrats (S&D) group, Belgium