

United Service Workers West



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8/29/19

Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Ms. Nichols and members of the California Air Resources Board, I write to urge the California Air Resources Board to reject consideration of the Tropical Forest Standard (TFS). This policy proposal would lay the groundwork for accepting tropical forest offset credits into California's carbon trading system, and other GHG emissions mitigation programs such as the International Civil Aviation Organization's (ICAO) Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA).

SEIU United Service Workers West represents 45,000 workers in California's low wage service economy, including nearly 8,000 airline service workers. Our membership includes a great number of workers who have immigrated from the Philippines, Mexico, Central and South America, and East and West Africa.

We are strongly in favor of reducing emissions from fossil fuels and for the preservation of tropical forests. But the TFS proposed by the California Air Resources Board is deeply misguided and would undermine the integrity of California's climate policies, and send the wrong signal to agencies beyond California.

We have a number of concerns directly with the TFS standard, as indicated by our joint submission with a like-minded environmental, environmental justice, and indigenous peoples' organizations, submitted under separate cover. But with this letter we want to register our rejection of the TFS specifically due to the potential for endorsing the ICAO CORSIA approach.

As CARB has demonstrated¹ aviation is one of the sectors with the fastest aviation growth. As an organization that supports the long-term health, safety, and dignity of California's airport workers, including in the face an increasingly unstable climate, it is in our interest to ensure that the aviation industry adopts real emissions reduction approaches, with co-benefits for reducing toxic emissions. As low-income workers, many of our members live in the communities most directly impacted by fossil fuel emissions and co-pollutants; as immigrants from tropical nations such as Mexico, the Philippines, West Africa, and Central and South America, many of our members have direct experience of dispossession and displacement due to unjust economic policies and authoritarian regimes.

ARB is doing people working in the aviation industry a great disservice by not being forthcoming in describing and analyzing a global aviation climate plan for which the agencies are offering an offset protocol. CORSIA is designed to achieve "carbon neutral emissions growth" – a concept that is scientifically and technically dubious. ICAO is an opaque and non-transparent entity that denies access of civil society organizations to their proceedings. CORSIA figures for calculating emissions bear no resemblance to accepted science and are subject to no peer review. This opaque and anti-democratic nature of ICAO is therefore a real concern for workers in the aviation industry.

By explicitly preparing to endorse an offset protocol for use in the CORSIA emissions trading system without assessing or providing public information on the CORSIA scheme itself, ARB perpetuates the injustice of the non-transparent nature of ICAO, a pro-industry organization which itself has no credible mechanisms to facilitate civil society engagement. Further, by endorsing an offset standard for use in CORSIA, the ARB is essentially endorsing CORSIA itself. As airport workers, we cannot permit this endorsement in the absence of robust public engagement.

For the reasons stated above, we strongly urge the ARB to reject any attempts to accept

Reduced Emissions from Deforestation and Degradation (REDD) credits into California's carbon trading system, or to endorse or support the ICAO CORSIA scheme. Instead, we encourage California to take true climate leadership by piloting alternatives to offsets, such as ending public procurement of tropical deforestation-linked commodities, reducing imports of those commodities into our market, and reducing fossil fuel emissions at the source.

Sincerely,

A handwritten signature in black ink, appearing to be 'SG' with a large loop and a horizontal line extending to the right.

Sanjay Garla
Vice President