**Comments on Draft California Tropical Forest Standard**

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I write in support of the proposed endorsement by the California Air Resources Board of the Draft California Tropical Forest Standard.

**The basis for comment:**

For more than a decade, I have focused my professional attention on the issue of tropical forests and climate change, and am lead author of the 2016 book, *Why Forests? Why Now? The Science, Economics, and Politics of Tropical Forests and Climate Change*. Positions that I have held include Director General of the Center for International Forestry Research (CIFOR), Senior Fellow at the Center for Global Development (CGD), and Distinguished Senior Fellow at the World Resources Institute (WRI). I have also served as a consultant to the David and Lucile Packard Foundation, the Government of Norway, and the World Bank. The following comments draw on the knowledge and experience that I have accumulated through those professional engagements but are not made on behalf of and should not be construed to represent the positions of those organizations.

**General endorsement of the Draft Standard:**

The Draft California Tropical Forest Standard represents an important milestone in global efforts to integrate land sector emissions and removals – and emissions from tropical forest loss in particular – into climate change mitigation efforts. The science behind these efforts, summarized in [*Why Forests? Why Now?*,](https://www.cgdev.org/publication/why-forests-why-now-science-economics-and-politics-tropical-forests-and-climate-change) has only become stronger since the book’s publication in 2016: [Griscom et al (2017)](http://www.pnas.org/content/114/44/11645) estimated that the land sector offers up to 37% of cost-effective mitigation efforts needed before 2030, while a number of recent articles (summarized in [Harris and Wolosin, 2018](https://www.wri.org/publication/ending-tropical-deforestation-tropical-forests-and-climate-change-latest-science)) have illuminated forests’ many contributions to climate stability above and beyond carbon capture and storage.

Yet in the meantime, tropical tree cover loss has accelerated, with 2016 and 2017 [shattering](https://www.wri.org/blog/2018/06/2017-was-second-worst-year-record-tropical-tree-cover-loss) previous records. And the recent report by the Intergovernmental Panel on Climate Change ([IPCC, 2018](http://www.ipcc.ch/report/sr15/)) makes clear that keeping global warming below 1.5 degrees Celsius will be impossible without conservation of the world’s remaining forests and further enhancement of forest carbon stocks. It has never been more urgent to provide a signal to tropical forest jurisdictions that their efforts to protect and restore forests are recognized and may become eligible for financial reward. Since establishment of the [Governors’ Climate and Forests Task Force](https://gcftf.org/) in 2008, leaders of tropical forest jurisdictions have looked to California for leadership in this area, as recently demonstrated through their Annual Meeting in conjunction with the Global Climate Action Summit in September 2018.

The objective of avoiding emissions from tropical deforestation was first incorporated into negotiations under the United Nationals Framework Convention on Climate Change in 2007. Since then, public officials, scientists, and representatives of indigenous peoples, the private sector, civil society and other stakeholder groups have all contributed to elaborating a framework for reducing emissions from deforestation and forest degradation and enhancing the role of conservation, sustainable management of forests and enhancement of forest carbon stocks in developing countries (REDD+) that was endorsed in the 2015 Paris Agreement.

The Draft California Tropical Forest Standard is the best available codification of the consensus on standards that has emerged from debates over REDD+ within the UNFCCC, financing mechanisms such as the Forest Carbon Partnership Facility’s Carbon Fund, and various voluntary standard-setting initiatives, as well as in the context of dozens of national and sub-national REDD+ initiatives around the world.

It is my judgement that the Standard’s criteria for assessing jurisdictional-scale programs that reduce emissions from tropical deforestation more than adequately address the risks that have been identified. Such risks are by far counterbalanced by the risks of no action, which include not only the exacerbation of climate instability caused by continued forest loss, but also the loss of forests’ significant contributions to achieving many of the other [Sustainable Development Goals](https://www.wri.org/blog/2017/09/forests-and-sdgs-taking-second-look) agreed by the United Nations.

The Standard addresses risks to environmental integrity through measures to ensure robust crediting baselines, reference levels, and monitoring, and specific measures to assess and manage the risks of leakage and reversals. Many critics of REDD+ have not sufficiently recognized the degree to which implementation of REDD+ at the scale of entire jurisdictions (rather than individual projects) as negotiated under the UNFCCC itself guards against many of these risks. The advantages of the “jurisdictional approach” are described will in Chapter 2 of the draft Environmental Analysis of the Standard.

The Standard also includes strong social and environmental safeguard requirements, bolstered by procedures to ensure transparency and public accountability for their implementation. One of the most important objectives of any effort to conserve tropical forests must be the protection of the rights of indigenous peoples, and some have asserted that REDD+ poses unacceptable risks to that objective. Yet a number of indigenous groups have cautiously embraced REDD+ as an instrument to advance their rights and welfare, and a recent Working Paper published by the Center for Global Development ([Savedoff, 2018](https://www.cgdev.org/sites/default/files/competing-or-complementary-strategies-protecting-indigenous-rights-paying-conserve-forests.pdf)) suggests that the greatest threat to the interests of indigenous peoples is the failure to implement REDD+ in the face of rampant forest destruction.

Incorporation of tropical forests in the California’s Cap-and-Trade Program would provide political leaders in forest-rich tropical jurisdictions with incentives to accelerate their efforts to protect forests, providing both global and local benefits. But whether or not tropical forests are eventually incorporated into the State’s Cap-and-Trade Program, the Board’s endorsement of the Standard would have ramifications far beyond the State of California. Other jurisdictions around the world, and international organizations such as the International Civil Aviation Organization (ICAO) are developing carbon offsetting and emissions trading regimes, and it is essential that they adopt rigorous standards for the inclusion of forest carbon credits. Endorsement of the California Standard would increase the likelihood that reduced emissions from tropical forests will be included appropriately in these other systems.

Further, over the last five years, many corporations – including those affiliated with the [Consumer Goods Forum](https://www.theconsumergoodsforum.com/implementing-and-scaling-up-the-cgf-zero-net-deforestation-commitment/) – have made commitments to deforestation-free supply chains for commodities such as beef, soy, and palm oil. Many such companies have announced or are considering a jurisdictional approach to preferential sourcing of forest-risk commodities. As a result, rigorous standards for assessing jurisdictional-scale performance, and the complementary jurisdictional-scale REDD+ finance that such standards could release, have an even broader constituency, and could leverage additional private sector action to protect forests.

**Specific comments on the text of the Draft Standard:**

* The Draft Standard defines “native forest” as “forest occurring naturally in an area, as neither direct nor indirect consequences of recent human activity” (page 7). Significant areas of natural forests in the tropics have been affected by the management practices of indigenous and traditional communities, such as long-rotation swidden cultivation. In addition, “native forest” could be the result of human restoration efforts, such as the re-wetting of peatland forest to allow native vegetation to grow back. The remainder of the definition specifies the need for diversity of species and age classes, as well as the exclusion of monoculture and industrial plantations. As a result, I suggest that the phrase “as neither the director nor indirect consequences of recent human activity” be deleted from the definition as unnecessary and to avoid confusion.
* The Draft Standard specifies in several places that implementing jurisdictions are “subnational”, defined as “a political subdivision of a country, typically taking the form of a state or province” (page 8). The subnational scale is indeed appropriate for larger countries such as Brazil and Indonesia. Yet smaller countries such as [Ecuador](http://www.un-redd.org/single-post/2018/09/04/Ecuadors-Pioneering-Leadership-on-REDDA-Look-Back-at-UN-REDD-Support-Over-the-Last-10-Years) have been developing national-scale REDD+ initiatives in anticipation of gaining access to international climate finance. I suggest that the Draft Standard be revised so as to clarify that jurisdictional programs implemented at the national scale could also be eligible for linkage, so that the Standard can have the widest possible application.