

29 August 2019

Chairwoman Mary Nichols and Board
California Air Resources Board (ARB)
1001 "I" Street
Sacramento, CA 95814

Dear Chairwoman Nichols and California Air Resources Board Members,

As the premier verification body engaged in provision of offset verification services under the Cap and Trade Program and voluntary carbon standards around the world, SCS Global Services (SCS) appreciates the opportunity to provide strong support for the California Tropical Forest Standard. SCS has provided forest carbon offset validation and verification services in both temperate and tropical regions and is confident that offsets from the tropical sector would be able to meet the stringent requirements of an Emissions Trading System (ETS) such as California's Cap and Trade Program.

Since 2008, SCS has verified over 220 million tonnes of CO₂e, becoming the fastest verification entity to reach this accomplishment. During this time, SCS has reached this milestone by applying the rigorous standards for carbon offset verification required for accreditation under ISO 14065 for GHG Validation and Verification by the American National Standards Institute. This international standard is the gold standard for carbon offset validation and verification and is necessary to evaluate projects and sector-level assessments under the Verified Carbon Standard (VCS), Climate Action Reserve (CAR), and the American Carbon Registry (ACR). To date, SCS has verified forest offset projects on five continents ranging from projects in Reforestation, Improved Forest Management, and Reduced Emissions from Deforestation and Degradation (REDD+) as well as sector-level REDD+ programs.

For all of these assessments, SCS offers high-quality evaluation, utilizing the principles of verification to ensure a fair representation and a credible and balanced account of GHG emissions reductions. These principles are relevance, completeness, consistency, accuracy, transparency, and conservativeness. From our experience in interdisciplinary projects from Colombia to Cambodia, SCS has seen first-hand that their cadre of highly trained staff in the fields of biometrics, forestry, remote sensing, social ecology, and governance have been able to competently evaluate the GHG emissions reductions with the assistance of local experts trained in the laws, culture, and language in these diverse tropical areas. It is certain that qualified verification bodies would be able to ensure that tropical sector offsets are able to meet the ARB requirements that they are real, additional, quantifiable, permanent, verifiable, and enforceable.

Moreover, SCS has found that REDD+ projects and programs in tropical areas contribute enormous co-benefits to local and regional communities and ecosystems. The robust requirements to confirm these net positive benefits to communities and biodiversity are ensured by the verification requirement to meet ISEAL Social and Environmental Safeguards as well as the REDD+SES principles and criteria for the sector programs.

Above all, SCS would like to strongly support the inclusion of tropical sector offsets to the CA Cap and Trade Program because it demonstrates leadership to the international economy about both the importance of tropical forests to reduce climate change impacts as well as the ability to competently evaluate these offsets. The UNFCCC has provided the framework for this work and the ARB inclusion of tropical forests in their ETS would innovative for a temperate jurisdiction, sending a clear signal of California's unparalleled leadership and connection to the global community.

In summary, SCS appreciates the opportunity to provide strong support for the California Tropical Forest Standard. I encourage your staff to follow up with me directly regarding any of our comments mentioned herein.

Sincerely,



Christie Pollet-Young
Director, Greenhouse Gas Verification Program