Scientific Certification Systems, d.b.a. SCS Global Services, is very pleased to be presenting comments about the ARB's white paper related to the potential inclusion of sector-based offset credits from REDD programs under the Cap and Trade Program. SCS is very supportive of regulatory amendments to allow for the use of sector-base offsets during the third compliance period of the Program.

Above all, SCS is fully supportive of the statutory criteria that credits have to be "real, permanent, quantifiable, verifiable, additional, and enforceable." With respect to the verification requirement, SCS would like to offer to the ARB, the GCF, and the Governor, its expertise and experience as you determines the appropriate system for the verification of sector-based REDD programs. SCS has served on working group for a multitude of forest carbon offset schemes and would be honored to assist in the development of the ARB's bespoke approach. Specifically, SCS would be able to participate in the additional work related to the "Verification of emissions statistics" described on page 42 of the white paper. In addition, SCS is available to provide feedback from the perspective of a verification body of both the ARB Cap-and-Trade Program and the voluntary forest carbon offset market.

SCS applauds California's continued interest to be a global leader and innovator in climate change action. SCS is confident that that high-quality offsets can be generated to meet the rigorous requirements of AB 32 and the mandate for low-cost carbon reductions.

SCS' Background
Since 2008, SCS has been a leading verification body for forest carbon offset credits under the voluntary market and more recently as the verification body of record for the first ARB forest compliance project in 2013. Having completed more than 150 project assessments, SCS has verified over 50 million offset credits around the global. This year, SCS was selected as the verification body to assess the State of Acre's Jurisdictional and Nested REDD Program under the Verified Carbon Standard.