



California Air Resources Board
1001 I Street
Sacramento, CA 95814

May 13, 2016

Submitted via ARB comments webpage: www.arb.ca.gov/cc/capandtrade/meetings/meetings.htm

RE: Technical workshop series on International Sector-based Offsets from Tropical Forests

Thank you for the opportunity to submit comments to the California Air Resources Board regarding the potential inclusion of international sector-based offsets from tropical forests in its cap and trade program. This is a critical moment for California to move forward in leveraging a small part of its comprehensive climate program to directly promote the reduction of greenhouse gas emissions from the cutting and burning of tropical forests, and send a powerful signal to tropical forest jurisdictions around the world that robust, high-quality programs to reduce deforestation and forest degradation can and will be rewarded by carbon markets. The limited quantity of international offsets currently permitted would leverage gains in emissions reductions from tropical forests around the world that far exceed the offset quantity that would be credited in California's system. In this way, California's action would amplify the impact of its climate program globally.

Once again, we commend CARB for only considering programs that ensure environmental integrity and establish appropriate benchmarks for crediting reductions over time based on demonstrated performance in reducing forest sector emissions at the level of the entire jurisdiction of a host state or province. As we explain in further detail below, we believe that taking a whole-sector, jurisdictional-level approach to crediting emissions reductions from reducing tropical deforestation and degradation will result in real, additional reductions in partner jurisdictions that benefit the atmosphere and forest-dependent communities.

A jurisdictional approach recognizes aggregate reductions achieved below the level of a baseline across the entire region. A rigorously set baseline is thus analogous to an ambitiously set and enforced cap under a cap-and-trade program at the level of a whole state such as California or Quebec, which is implementing a whole suite of measures to limit aggregate emissions and transition the economy to a lower emissions growth model. We would once again like to emphasize, that this approach provides similar assurance of additionality, consideration of leakage, and ability to manage risks of non-permanence at the level of the entire jurisdictional system.

The jurisdictional approach to crediting emissions reductions across the entire forest sector of a state, province, or country, provides incentives for actions at the government as well as private actor level, thus engaging all the potential levers of change for reducing deforestation and transitioning economies at broad scale. Measurement of emissions --as well as monitoring, reporting, and verification (MRV) of emissions reductions against a historical baseline -- are far more accurate and robust at the jurisdictional level, and achieve a lower cost per unit over the scale of an entire region than at small-

scale, project level. Jurisdictional programs also ensure that any leakage (potential shifts in emissions from one actor to another) is accounted for at the level of the entire jurisdiction, just as any leakage from one actor to another is addressed within a cap-and-trade program.

The ARB staff white paper posted on March 18, 2016, as well as the staff presentations made during the three technical workshops conducted this spring, requested specific feedback on several areas on which EDF would like to weigh in.

Program Scope: EDF concurs with the recommendations of the REDD Offset Working Group (ROW), that California should credit emissions reductions from both reduced deforestation and degradation within jurisdictional programs that demonstrate comprehensive measurement and accounting of those sources of emissions across their forest sector. In addition, ARB should look to develop robust criteria for crediting carbon stock enhancement of natural forests, in jurisdictions that explicitly measure and monitor these activities within their programs, provided that they again, are able to demonstrate that both measurement and accounting for carbon enhancement meet appropriate standards of measurement.

Crediting Pathway: We agree with CARB's assessment that the partner jurisdiction which implements a program to reduce emissions from its forest sector must ultimately account for and determine the number of credits that can be issued and offered as offsets for compliance with California's cap and trade system.

Reference Levels: EDF heavily endorses the proposed approach outlined in CARB's March 18, 2016 white paper that reference levels should be set based on historical deforestation emissions across the entire forest sector in a given partner jurisdiction, thus eliminating hypothetical projections of deforestation trends in a given jurisdiction, and instead incentivizing programs that have adopted deforestation reduction targets that will reduce deforestation emissions against measurable historical levels and ensuring additionality. Further, we agree that a ten-year historical time period is adequate to capture year-to-year variability in deforestation rates, while reflecting the recent policy and economic context within which the program is being implemented.

Crediting Baselines: We recommend that the crediting baseline be set in relation to an ambitious deforestation reduction trajectory or "target" that is appropriate for each state and increases in ambition over time. The crediting baseline should lie below the reference level but above the targeted level of deforestation emissions in each host state so as to allow that state to receive crediting that will support and sustain its efforts to achieve and potentially even exceed this target. Establishing a crediting line in relation to a target trajectory allows flexibly to tailor the crediting requirements over time according to the capacities and other conditions in each host state. This approach is also analogous to evaluating another jurisdiction's cap for a linkage. However, also as the ROW recommendations suggest, if a partner jurisdiction can already demonstrate own efforts on reducing emissions, it may be possible to justify setting the crediting baseline equal to the reference level, keeping in mind that reductions attributable to the partner jurisdictions own efforts should still be measured and reported.

Leakage: Monitoring of emissions and crediting reductions relative to a baseline at a jurisdictional scale are the best approaches for accounting for any potential leakage (shifts) in deforestation within the jurisdiction. In other words, if forest protection efforts result in deforestation merely shifting to another part of the jurisdiction, the net impact on deforestation and associated emissions will be reflected in the jurisdictional level accounting. We also recommend that ARB establish simple yet effective approaches

to ensure that forest protection efforts within a jurisdiction are effectively addressing the root causes of deforestation, chiefly pressures to expand agriculture in an unsustainable manner, rather than merely shifting these pressures to other locations outside the jurisdiction. The best way to do this is to ensure that the jurisdiction is maintaining, rather than suppressing, agricultural and forestry output at the same time that encroachment on forest areas is being controlled. We have developed a simple approach for estimating the potential for leakage called the “effective area approach.” This tracks whether, for every hectare of forest land protected rather than deforested, the jurisdiction has added an “effective” hectare of commodity production elsewhere within its borders, either by extending production or improving productivity on existing production areas. Thus a hectare of agricultural production can effectively be added by adding one more hectare of agricultural production or doubling the productivity on an existing hectare of agriculture.

This approach is simpler than other approaches that rely on modeling and that require detailed information on what specific commodities would be grown on the areas of avoided deforestation/degradation. A version of this approach has been adopted by the Verified Carbon Standard (VCS) as one of its “global commodity leakage modules” under its Jurisdictional and Nested REDD+ (JNR) standard.¹ To the extent that the potential leakage is detected, some fraction of that potential leakage could be deducted from the jurisdictional performance, as per the VCS approach which considers likely leakage within the country in which the jurisdiction is located. Another approach would be to assume one-for-one or 100 percent potential for leakage from any amount of hectares of lost production not made up for in the jurisdiction either by more extensive or intensive production. This would be a simplified and conservative approach to address the uncertainties over demand and supply elasticities in global markets with the goal of encouraging mitigation of leakage within the jurisdiction.

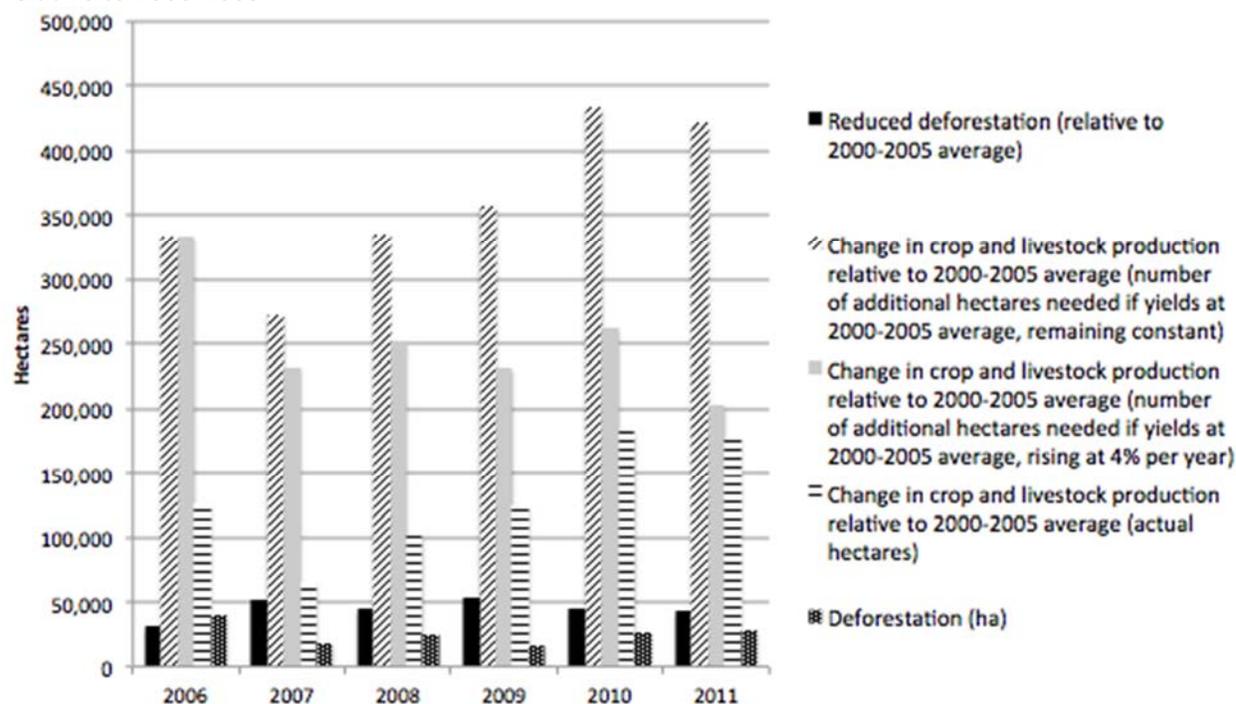
As part of the process of developing the leakage module described above, we conducted an illustrative assessment for the state of Acre, Brazil, over the period from 2006-2011. While this analysis has not yet been updated to 2015, it provides an illustration of the approach and a validation of Acre’s accomplishments. The Figure 1 and Table 1 below show an example of the calculations described above for the state of Acre, Brazil, based on official government deforestation and agricultural census data. For illustration, the period 2006-2011 was compared relative to a baseline period of 2000-2005. The black bars in Figure 1 show the reduction in deforestation in each year (average deforestation over 2000-2005 minus actual deforestation in each year from 2006 to 2011), while the black bar with white dots show the remaining hectares of deforestation in each year over 2006-2011.

The reduction in deforestation is compared with the effective hectares of new commodity production for cattle and the ten principal crop commodities for which data are reported. In addition to new production, productivity increased so that “effective hectares” of production rose by more than actual hectares. For illustration, we compare the “effective hectares” of new production using two methods, assuming a baseline of constant yields over 2000-2005 and assuming a baseline with yields rising at 4% per year in line with average population growth.

Even in the case of the rising baseline for yields, the jurisdiction added new production in excess of the lost potential area of production from reducing deforestation. This indicates that Acre’s program to reduce deforestation did not result in net leakage from the jurisdiction. This calculation is conservative in that it does not account for the likely lower productivity of land being deforested compared to land being used for agriculture.

¹ See here: <http://www.v-c-s.org/sites/v-c-s.org/files/Global%20Commodity%20Leakage%20Module%20-%20Effective%20Area%20Approach%20v1%200%2004%20FEB%202014.pdf>

Figure 1. Estimated Change in Effective Area of Commodity Production in Acre, Brazil, over 2006-2011 relative to 2000-2005



Source: EDF analysis based on PRODES, Agricultural Census (IBGE), and Acre em Numeros. (Acre, State government)

Note: the grey shaded bars correspond to the total “effective hectares” calculated in Table 1.

Table 1 shows how effective hectares increased for some commodities, chiefly livestock, cassava, and corn while declining for others (rice and beans). The net effect was an increase in effective hectares of production relative to the baseline period. Because Brazil’s 2012 agricultural census has not yet been released, making 2006 the most recent year of data currently available, yields of cattle were assumed constant from 2006-2011. This will underestimate the increase in effective hectares if productivity continued to rise after 2006 relative to the 2000-2005 average. To address the periodicity of data, leakage calculations could be estimated on a yearly basis but finalized every 5 years. In the interim, a temporary leakage factor might be applied to the reductions from the jurisdiction, with further reductions credited as the relevant data become available.

Table 1. Estimated Change in Effective Hectares of Commodity Production in Acre, Brazil over 2006-2011 (relative to 2000-2005 average production and yields, rising at 4%/year)

Commodity	2006	2007	2008	2009	2010	2011
Bovines (cattle)	332,521	226,808	244,611	248,613	241,722	184,557
Cassava	2,347	10,497	16,178	5,452	20,919	24,934
Corn	1,536	211	1,567	-2,462	11,566	10,339
Cane Sugar	562	599	1,028	603	2,573	4,635
Watermelon	151	32	389	291	908	789
Tobacco	40	-7	-53	-72	-41	-46
Groundnut	30	31	63	90	82	150
Pineapple	2	-13	64	74	325	335
Sweet Potato	1	1	10	8	21	33

Rice (paddy)	-1,102	-5,402	-6,107	-12,762	-10,400	-13,145
Beans (grain)	-1,980	-383	-5,432	-7,818	-5,255	-10,040
Total	334,108	232,374	252,318	232,016	262,422	202,541

Source: PRODES, Agricultural Census (IBGE), and Acre em Numeros (Acre State government).

Note: Yields of cattle were assumed constant from 2006-2011. This will underestimate the increase in effective hectares if productivity has been rising.

Permanence: CARB’s approach to international sectoral offsets has important implications for permanence, that is, the guarantee that a credited emissions reduction will not be released to the atmosphere at a later date. The IPCC discussion of permanence makes it clear that for emissions reductions (carbon flows) a permanent reduction is one that allows a given output (of energy or goods) to be produced with less emissions than previously. “. . . Suppose that a homeowner replaces an incandescent bulb with a compact fluorescent, avoiding one ton of emissions over the life of the compact fluorescent. The benefit is not reversed even if an incandescent bulb is installed at the end of the compact fluorescent’s useful life.”²

This is consistent with the understanding that a robust emissions reduction strategy must break the historical link between energy output and economic growth and increased emissions. A jurisdictional approach to reducing deforestation that reduces emissions while maintaining or increasing production of the drivers of deforestation (in the Amazon, agriculture and cattle ranching), as Acre and other Amazon states have done, breaks the historical link between production and emissions and thus results in permanent emissions reductions. Crediting increase in carbon stocks, or sequestration, however, requires mechanisms to ensure the preservation of particular carbon stocks, such as credit buffers or carbon insurance.

To evaluate whether a jurisdiction has implemented an approach to reducing deforestation that reduces emissions while maintaining or increasing production of the drivers of deforestation, we recommend using the leakage metric described above as the central approach to identify risk of non-permanence. To the extent that there is a potential risk that some reductions achieved might be reversed later, it is important that ARB establish rules for ensuring that reversal risk is effectively managed and mitigated by participating host-state programs, per the suggestions outlined below.

First, California should require that reversals are made up at the level of the entire jurisdiction, rather than at the level of individual projects. This jurisdiction-wide accounting is itself the best insurance mechanism as it will pool the risk of reversals due to fires and other risks across the entire jurisdiction. This will be particularly effective against uncorrelated risks that can be quantified and anticipated as part of the crediting protocols.

Second, the risk of reversals at the level of the entire jurisdiction should be insured against through a jurisdiction-wide reversal buffer fund to which projects and other actors contribute via a share of their credits or of their revenues, through private insurance, and/or another insurance mechanism to account for reversal risks at the jurisdiction level (see Cortez et al. 2010 for more discussion of how such systems can be structured)³. A buffer reserve of credits is an attractive alternative but is not the only viable mechanism. A buffer may also need to be supplemented with escrow accounts or other mechanisms, especially in the early years of the program when insufficient credits may have been generated to stock

² http://www.ipcc.ch/ipccreports/sres/land_use/index.php?idp=73

³ Cortez, R., R. Saines, B. Griscom, M. Martin, D. De Deo, G. Fishbein, J. Kerkering, D. Marsh. 2010. A Nested Approach to REDD+ Structuring effective and transparent incentive mechanisms for REDD+ implementation at multiple scales. The Nature Conservancy and Baker & McKenzie. Arlington, VA.

a reversal buffer reserve (though this issue could be ameliorated, at least in part, through the use of early action credits as already suggested above).

Third, if the jurisdiction-wide buffer reserve or other insurance mechanism proves insufficient, California should consider provisions by which a host state/province can true up any credits reversed through reductions earned in subsequent commitment periods (plus an interest penalty). This true-up would need to occur before issuing any additional credits for reductions in that period.

Finally, private insurance mechanisms may develop through which market participants can cover any residual risks not effectively managed internally by the host states. A price premium should accrue to host states that can produce credits with lower expected risks. Allowing prices to reflect such different risks is appropriate to provide market incentives that reward superior performance.

Social Safeguards: The establishment of rigorous social and environmental safeguards are a critical component of any jurisdictional program for reducing emissions from deforestation and degradation, both to amplify the co-benefits of those programs, as well as to ensure those programs' ultimate success. Forest communities must be included in, and benefit from, the development and implementation of forest policies and programs. Forest communities are valuable partners in the effort to mitigate deforestation emissions and develop sustainable approaches to the conservation and use of forests that ensure their current and future well-being.

A transparent demonstration of equitable benefit sharing and implementation of the principles of Free Prior and Informed Consent (FPIC) are paramount to determining the adequacy of any jurisdiction's approach to implementing social safeguards. EDF endorses the principles set forward the REDD+ safeguards found in Annex 1 of the UNFCCC Cancun Agreement, the guidance on safeguard information systems in UNFCCC 12/CP.17 and best-practice standards such as the REDD+ Social & Environmental Standards (SES). In examining a potential linkage for international sector-based offsets from forests, CARB should carefully examine the individual facets of a jurisdiction's safeguards standards and practices, including specifying how potential partner jurisdictions will satisfy and operationalize safeguards, as well as monitor and report on their implementation.

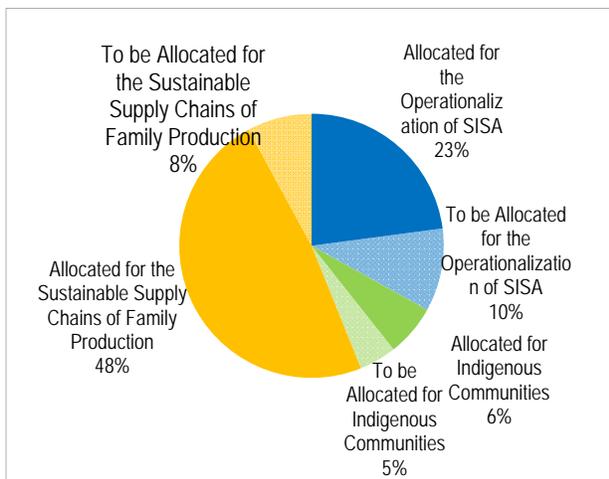
Acre's state Incentive System for Environmental Services (SISA) program (see further description below) has established a system of social and environmental safeguards that is exemplary and carries certifications from both REDD+ SES and the Climate, Community, and Biodiversity Alliance (CCBA). While Acre's model and the standards set by these certification bodies provide excellent guidelines, individual jurisdictions may be able to demonstrate rigorous standards that do not necessarily carry these certifications. In the future, CARB may want to discuss with potential partner jurisdictions the relative costs and benefits associated with specific certifications, provided that the jurisdiction can demonstrate the establishment and implementation of an equivalently rigorous mechanism for implementing and monitoring social and environmental safeguards.

The Acre Program: EDF further commends CARB for its selection of Acre as a partner in evaluating the possibility of using international sectoral offsets from reduced deforestation in AB-32. Acre has since 1999 pioneered in developing policies and programs in support of environmentally sustainable, socially equitable development. Broadly participatory process and particular focus on minority and disadvantaged communities have been hallmarks of the last five state governments. Acre's state Incentive System for Environmental Services (SISA) was adopted in 2010 by unanimous vote in the State Legislature, and has been certified by both the Climate, Community and Biodiversity Alliance (CCBA), leading developer and certifier of social and environmental standards for emissions reductions projects

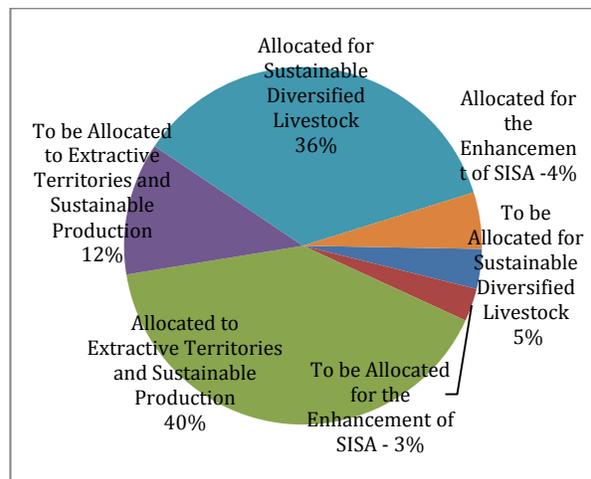
and programs, and the REDD+ Social and Environmental Standards (SES), widely regarded as the most comprehensive and stringent set of social and environmental standards for deforestation reduction projects and programs. Acre was the first jurisdiction to complete all ten steps of the REDD+ SES, including the REDD+ SES International Review⁴, evaluating the quality of the process flowed to implement the standards.

Acre has further demonstrated in practice the very significant advantages of a jurisdictional approach to reducing deforestation for equitable and effective benefit distribution. In a stand-alone project approach, where “additionality” must be demonstrated at the individual project scale, project proponents with high historical deforestation, or high immediate risk of deforestation, will inevitably generate more credit than proponents with low deforestation and low risk. Indigenous and forest communities that have historically protected their territories have low deforestation and may be far from active frontiers are at a disadvantage under a localized, project-based approach to setting reference levels. In Acre’s SISA, however, emissions reductions are tallied at the state level, and allocated to programs designed and negotiated with all stakeholders responsible for providing the service of reducing deforestation and ensuring that Acre meets its deforestation reduction targets. Figures 2-3, detailing the distribution of Acre’s first two international transactions of emissions reductions credits with REDD+ Early Movers program of the German development bank, KfW, demonstrates how proceeds were divided among indigenous peoples, family farmers, ranchers and the government, in practice.

**Figure 2. Distribution of Benefits
REM Program I (R\$ 2012-2015)**



**Figure 3. Distribution of Benefits
REM Program II (R\$ 2013-2015).**



Source: Acre Climate Change Institute (IMC).

Further to EDF’s own technical comments and views on the value on including sector-based international offsets from tropical forests in its program, we would also like to draw CARB’s attention to broad-based support for moving forward in this process from civil society groups, including many of Brazil’s leading environmental organizations and business leaders on sustainability and climate action. Attached are a letter from Brazil’s Climate Observatory, a civil society coalition of some forty of Brazil’s most accomplished groups working on climate change (See Appendix I and I.1). Also find

⁴ <http://www.redd-standards.org/what-is-new/150-state-of-acre-brazil-first-country-to-have-completed-the-full-ten-step-process>

attached a letter from the Brazilian Coalition on Climate, Forests and Agriculture, a coalition of 110 leading NGOs and companies addressing climate change and land use change (Appendix II and Appendix II.1), both strongly supporting the inclusion of international sectoral offsets from reducing tropical deforestation in AB32.

By moving forward to recognized sector-based offsets from reducing deforestation in rigorous and high-quality programs in tropical forest jurisdictions, California can continue to lead the way on climate change in partnership with other states, provinces, and nations who are taking action. Initiatives for reducing emissions from deforestation and forest degradation – the source of more emissions globally than all the cars and trucks in the world -- are a critical part of addressing global climate change, including climate change in California.

We hope that you will consider these comments in creating a pathway to strengthen California's program at home and dramatically increase the global impact of California's climate action.

Sincerely,

Steve Schwartzman
Senior Director, Tropical Forest Policy
Global Climate Program

Appendices

Appendix I

Brazilian Climate Observatory's Letter of support for the inclusion of forest sector offsets from programs of “Reducing Emissions from Deforestation and Land Degradation (REDD+)” in California’s AB 32 program

Appendix I.1

Climate Observatory - Clarification on OC letter

Appendix II

Support letter from Brazilian Coalition on Climate, Forests and Agriculture

Appendix II.1

Members of Brazilian Coalition on Climate Forests and Agriculture



Sao Paulo, Brazil, April 27, 2016

The Honorable Governor Jerry Brown
c/o State Capitol, Suite 1173
Sacramento, CA 95814

Dear Governor Brown,

We, at Climate Observatory¹, a coalition comprising up to 40 Brazilian civil society organizations with the objective to promote the advance of climate change agenda in Brazil, are following the proposal for inclusion of forest sector offsets from programs of “Reducing Emissions from Deforestation and Land Degradation (REDD+)” in California’s AB 32 program, which will soon be voted on by the Air Resources Board.

As climate change is a universal problem, we commend California’s efforts to design and drive innovative solutions aimed at tackling climate change not only within its borders but elsewhere in the world.

International Sector Based Offset Credits is one of many programs under consideration as part of the Law for Solutions for Global Warming (AB32) and is an important mechanism for reducing emissions from deforestation and protecting tropical forests, upon which many communities’ lives and livelihoods depend, especially traditional and indigenous communities living in the Brazilian Amazon.

Thus, we write to express the support of the Brazilian Climate Observatory to the State of California for its significant efforts to reduce their greenhouse gas emissions domestically, and also for considering the importance of tropical forest conservation and the involvement of local communities in these efforts.

¹ www.observatoriodoclima.eco.br



The possibility of compensation for emissions offsets included in the cap-and-trade program of California represents a positive signal for the consolidation of an international mechanism for REDD+ which promises to create real benefits for climate, communities, and forest conservation in Brazil as well as in other developing countries. We believe that California should continue leading the inclusion of REDD+ within its system since this approach allows a significant, permanent and long-term funding pathway that is complementary to consistent with the mechanisms currently under discussion in the UN Convention on Climate Change (UNFCCC).

With our deepest expressions of esteem and appreciation,

Carlos Rittl, PhD

Executive Secretary

Climate Observatory

Sao Paulo, Brazil, May 06, 2016

To whom it may concern.

The Brazilian Climate Observatory (OC) is a network comprising a broad spectrum of Brazilian civil society organizations. OC's positions and recommendations on any issue are developed after consultation processes among its members aiming to reach consensus.

OC's position about any given issue represents the average views of its members, and does not necessarily correspond to any individual organizations' views or positions on the same specific subject.

OC has recently submitted a letter to the Honorable Governor of California, Mr. Jerry Brown, expressing its support for the inclusion of REDD+ activities on the States' AB32 program. That letter was a network-led initiative that contains its single signature.

It has come to our attention that third parties have shared that letter with stakeholders from different groups in the United States alongside a list of OC members, without previous consent of any or all network members. Unfortunately, that could have been mistakenly understood as a list of associated signatures to the letter from each individual OC member. That was not the case. The referred members list does not represent a list of additional signatures to the letter.

Greenpeace Brazil is one of OC members. Its well-known public positions, as well as the positions Greenpeace International, Greenpeace US or any other Greenpeace national organization, have not changed and do not endorse the inclusion of REDD+ activities in any offset mechanism or legislation worldwide. However, during the Climate Observatory internal consultation process, Greenpeace Brazil has kindly not expressed its opposition to the OC letter to the Governor of California as a matter of respect to the views of some other members.

In last few days, external stakeholders have approached Greenpeace USA about the issue with questions related to its positions on the subject of the letter. Therefore, I hereby certify what has been already stated above. The letter to Governor of California expresses the average views of OC members for its own position on the issue only. It was not signed by OC individual members and do not necessarily expresses the position of each network's member organizations.



Carlos Rittl Ph.D.

Executive Secretary
Climate Observatory



April 27, 2016

The Honorable Governor Jerry Brown
c/o State Capitol, Suite 1173
Sacramento, CA 95814

Dear Governor Brown,

We are following the proposal for inclusion of forest sector offsets from programs and projects of “Reducing Emissions from Deforestation and Land Degradation (REDD+)” in California’s AB 32 program, which will soon be voted on by the Air Resources Board. As climate change is a universal problem, we commend California’s efforts to design and drive innovative solutions aimed at tackling climate change not only within its borders but elsewhere in the world.

International Sector Based Offset Credits is one of many programs under consideration as part of the Law for Solutions for Global Warming (AB32) and is an important mechanism for reducing emissions from deforestation and protecting tropical forests, upon which many communities’ lives and livelihoods depend, especially traditional and indigenous communities living in the Brazilian Amazon.

Thus, we write to express the support of the Brazilian Coalition for Climate, Forest and Agriculture to the State of California for its significant efforts to reduce their greenhouse gas emissions domestically, and also for considering the importance of tropical forest conservation and the involvement of local communities in these efforts.

The possibility of compensation for emissions offsets included in the cap-and-trade program of California represents a positive signal for the consolidation of an international mechanism for REDD+ which promises to create real benefits for climate, communities, and forest conservation in Brazil as well as in other developing countries. We believe that California should continue leading the inclusion of REDD+ within its system since this approach allows a significant, permanent and long-term funding pathway that is complementary to the mechanisms currently under discussion in the UN Convention on Climate Change (UNFCCC).



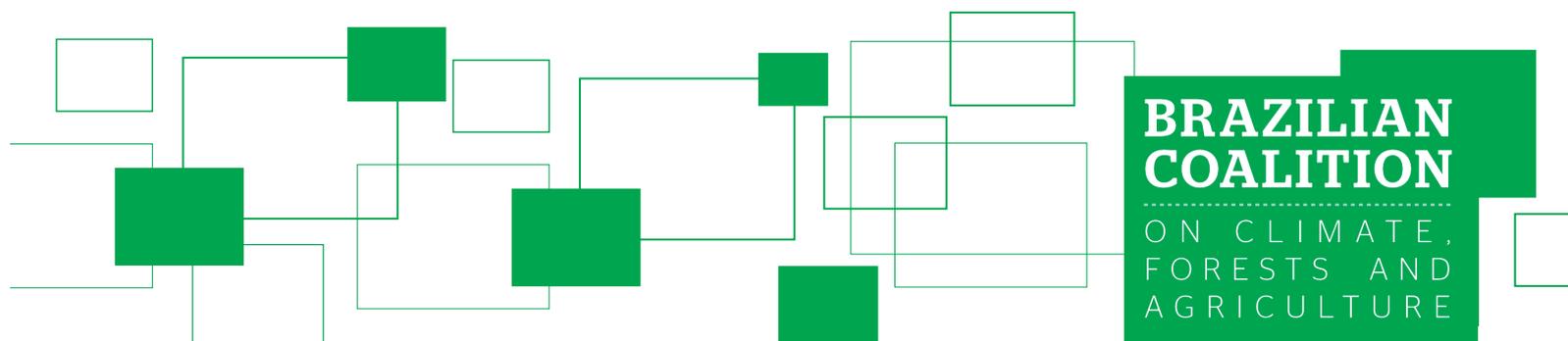
The Brazilian Coalition is composed of more than 110 Brazilian companies, research centers and civil society organizations¹ with the objective of debate climate change, and has a strong presence in the formulation, monitoring and monitoring of public policies for climate in Brazil.

With our deepest expressions of esteem and appreciation,

Coalizão Brasil Clima, Florestas e Agricultura

Website: coalizaobr.com.br

¹ <http://coalizaobr.com.br/en/index.php/members>



Organizations that joined the Brazilian Coalition on Climate, Forests and Agriculture

- Abag — Associação Brasileira do Agronegócio
- ABBI — Associação Brasileira de Biotecnologia Industrial
- Agrícola Conduru
- Agrosatélite Geotecnologia Aplicada
- AMA Brasil — Associação dos Misturadores de Adubos do Brasil
- Amaggi
- Amata
- Brookfield
- Cargill
- Apremavi
- Arapar
- AsBoasNovas.com
- ABCZ — Associação Brasileira de Criadores de Zebu
- ATA Consultoria
- Avina
- Biofílica
- Brookfield
- BvRio — Bolsa de Valores Ambientais
- Cargill
- Carrefour
- Cause
- Cebds — Conselho Empresarial Brasileiro para o Desenv. Sustentável
- Cenibra
- Centro de Estudos em Sustentabilidade da FGV-EAESP
- CI — Conservação Internacional
- Copersucar
- Corredor das Onças ARIE Matão de Cosmópolis/ ICMBio
- Corredor Ecológico do Vale do Paraíba
- Crível Comunicação
- Diálogo Florestal
- Duratex
- Ecofuturo
- Editora Horizonte
- Eldorado Brasil Celulose
- Envolverde
- Eucatex
- FBDS — Fórum Brasileiro de Desenvolvimento Sustentável
- Fibria
- Fórum Clima
- Fundação Grupo Boticário de Proteção à Natureza
- GCN Advogados
- Geoflorestas Soluções Ambientais
- Gerdau
- Grupo Boticário
- Grupo Libra
- Grupo Pau Campeche
- Grupo Plantar
- GTA — Grupo de Trabalho Amazônico
- Ibá — Indústria Brasileira de Árvores
- IBIO — Instituto Bioatlântica
- ICLEI — SAMS
- ICOON — Instituto Corredor das Onças
- ICV — Instituto Centro de Vida
- IDESAM — Instituto de Conserv. e Desenv. Sustentável do Amazonas
- IDS — Instituto Democracia e Sustentabilidade
- Imafloa
- Imazon
- Iniciativa Verde
- Inpacto — Instituto Nacional Para Erradicação do Trabalho Escravo
- Instituto Akatu
- Instituto Arapyaú
- Instituto Ecológica Palmas
- Instituto Ethos
- Instituto Inhotim
- Instituto Internacional para Sustentabilidade
- Instituto Terra
- IPAM — Instituto de Pesquisa Ambiental da Amazônia
- IPE — Instituto de Pesquisas Ecológicas
- ISA — Instituto Socioambiental
- Klabin
- Laboratório de Ecologia de Paisagens e Conservação IB-USP
- Maker Brands
- Melhoramentos CMPC
- MOV Investimentos
- MWV Rigesa
- Natura
- NELM Advogados
- Observatório do Clima
- Observatório do Código Florestal
- Oela
- Pacto pela Restauração da Mata Atlântica
- Partner Desenvolvimento
- Piza
- Proforest Brasil
- Rainforest Business School — Programa Amazônia em Transformação — IEA/USP
- RAPS — Rede de Ação Política pela Sustentabilidade
- Rede Social
- Seiva Consultoria em Meio Ambiente & Sustentabilidade
- Social Carbon
- Solidaridad Network
- SOS Mata Atlântica
- SRB — Sociedade Rural Brasileira
- Suzano Papel e Celulose SA
- Thymus Branding
- TNC — The Nature Conservancy
- Toledo Piza Consultoria Ambiental
- UICN — União Internacional para a Conservação da Natureza
- UNICA — União da Indústria de Cana-de-Açúcar
- VCS
- Veracel
- WRI — World Resources Institute
- WWF — World Wildlife Fund

By 21/08/2015. See the complete list at WWW.COALIZA0BR.COM.BR

