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Chair Mary Nichols California Air Resources Board 1001 I Street Sacramento,
Re: Draft California Tropical Forest Standard

Dear California Air Resource Board:

Grassroots Global Justice (GGJ) is formally submitting our opposition to the Draft California Tropical Forest Standard (Draft Standard) and the specific criteria California Air Resources Board (CARB) has set forth for linking a jurisdictional sector-based crediting program to reduce emissions from tropical deforestation with an emissions trading scheme.

Grassroots Global Justice is a national alliance of more than 60 local grassroots organizations, many of which are based in environmental justice communities. Our members live on the frontlines of the devastating health impacts of dirty energy as family whose air, water and land are directly impacted by oil refineries, fracking wells, waste incinerators, pipelines, coal mines, and power plants. As a global alliance, GGJ also works in partnership and solidarity with frontline communities globally, including Indigenous peoples movements and forest dependent communities throughout the global south. Collectively, we are deeply committed to the urgency of real emissions reductions at the source here in California and across the global north at the point where the emissions are directly created.

We urge CARB to abandon the Draft Standard and finally halt development of any elements of a future international, sector-based forestry offset program, especially for linkage with California's cap and trade program. Instead attention should be devoted to urgently and dramatically reduce emissions at the source and transition California to a clean energy economy.

Offsets achieve nothing to reduce the emissions that are poisoning California communities.

Offset schemes like the Tropical Forest Standard do not result in a reduction of emissions. Conversely, cap and trade programs allow big polluters such as refineries, waste incinerators, and power plants to release more greenhouse gasses legally. As frontline communities, who have historically suffered from carbon co-pollutants, our lives we cannot continue to endure as sacrifice zones in the global economy. Offset mechanism like the Tropical Forest Standard and California Cap and Trade distract from the only strategy that can work: ending emissions at their source.

Tropical forest offset programs pose serious risks to human and indigenous rights.

The market linkages proposed by CARB subject Indigenous Peoples to grossly disproportionate economic power, intimidation, and coercion and typically fail to obtain meaningful Free, Prior, Informed Consent (FPIC). Programs such as REDD+ (project or jurisdictional) are not new, and globally have resulted in land grabbing, and put Indigenous Peoples at risk of displacement and/or loss of control of their forests, their way of life, cultures, food security, and

sovereignty. The vague requirement for consultation in the Draft Standard is nowhere near the fundamental and internationally recognized right that Indigenous People and local communities have to Free Prior and Informed Consent. Briefing local people about the project, setting up a website and getting input on design is not the same thing as formally requiring that local people are not only informed, but are done so free of coercion and that they can give or withhold their consent to changes on their land. All of the criteria outlined in the Draft Standard are well intentioned, but are fundamentally flawed without the paramount status of consent.

Tropical forest offsetting has been discredited as an environmental strategy.

Offsets do not work: they allow *certain, permanent* harm (more GHGs) in exchange for the fallacy of hoped-for *uncertain, temporary* carbon sequestration. Offset programs (REDD+ etc.) fail to address the drivers of deforestation. Because of such flaws, no compliance market in the world accepts REDD+ credits.

CARB fails to consider the scientific evidence against tropical forest offsetting.

It is ignoring the extensive, peer-reviewed literature by independent researchers documenting the environmental and social failures of REDD+. It has relied too much on organizations and consultants with careers and personal stakes in offsetting projects and policies. The proposed TFS, fails to provide a plan consistent with California's legal requirement that emissions reductions be "real, additional, quantifiable, permanent, verifiable and enforceable".

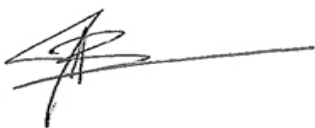
The IPCC Special Report on Global Warming of 1.5°C, released on October 8, 2018, establishes that urgent, dramatic and unprecedented changes to all aspects of our society is needed now, if the planet has any hope of avoiding the catastrophic impacts of climate change.¹ This level of urgency is fundamentally noncompliant with the concept of carbon emission offsets of any kind, but especially to jurisdictional international forest offsets.

In California under cap-and-trade, crude oil production, throughput, and real emissions have increased in the refinery sector. In 2017, California set a new record for foreign crude oil imports, sourcing crude extracted from endangered landscapes like Arctic Alaska. Last year, 1 in 6 barrels of oil refined in California came from the Western Amazon. We cannot afford to continue to burn the planet and pretend that we are making progress. Too much is at stake.

As a leader in the struggle against global warming, California must end its relationship with oil and cap-and-trade. Real and immediate emissions reductions are required to ameliorate an already catastrophic future. California must, in keeping with prevailing science, take immediate steps to keep oil in the ground if saving and restoring tropical forests is really the aim.

For all of these reasons, we urge CARB to abandon the Draft Standard and once and for all halt development of any elements of a future international, sector-based forestry offset program, especially for linkage with California's cap and trade program or any other emissions trading system. CARB should immediately shift attention to urgently and dramatically reduce carbon emissions at the source and transition California to a clean energy economy.

Respectfully,



Jaron Browne
National Organizer, Global Wellbeing Program