

Question for the Third Compliance Offset Protocol Task Force Meeting

1) Conflict of Interest (COI) concerns remain an important topic of the Third Compliance Offset Protocol Task Force meeting evidenced by many public comments and extensive discussion of COI during the Second Task Force meeting.

2) Letters of resignation* by Neil Tangri and Brian Nowicki cite serious COI concerns over the composition of the Task Force, as noted in the following excerpts:

"After the release of the draft report and the second meeting of the task force, it has become clear that the task force is riven with conflicts of interest and charged with contradictory aims. The draft recommendations are a roadmap for expanding and deregulating the offset program, reflecting the desires of the majority of task force members, who have financial interests in the program." (Neil Tangri)

"The current draft of the Task Force report--a compilation of recommendations developed separately by the different subgroups of the Task Force--is largely a wish list of ideas for expanding and deregulating the offset program, reflecting the desires of various Task Force members. In my perspective and experience, most of the members of the Task Force either represent organizations that have a vested interest in expanding the use of offsets or have ties to industries and organizations that stand to benefit financially from offsets." (Brian Nowicki)

3) In addition, statements by Gary Graham Hughes, California Policy Monitor – Biofuelwatch, also cite alarming COI concerns over the "Offset Task Force Beset By Scandal". **

4) Given the importance of transparency for the Task Force's work and final recommendations, at a minimum, a full COI check is warranted for each individual at the level of that required for a CARB Third Party Verifier.

5) CARB has published a COI process/form required for Third Party Verifiers as described*** and as attached for your reference. A comprehensive COI process is standard for organizations who set policy that affect financial outcomes.

6) Should the Compliance Offset Protocol Task Force not be exempt from a rigorous COI process?

* <https://ww2.arb.ca.gov/resources/documents/compliance-offsets-protocol-task-force-documents>

** <https://www.arb.ca.gov/lists/com-attach/56-ab398offsetreport-ws-B2gCYgdgVnYBYlcj.pdf>

*** <https://ww3.arb.ca.gov/cc/capandtrade/offsets/forms/coioffsets.doc>