



August 29, 2019

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Resilient nations.*

California Air Resources Board
1001 I Street
Sacramento, CA 95814
USA

Dear Board Members,

The United Nations Development Programme commends California for its continued leadership in recognizing the critical climate change mitigation role played by tropical forests. Adoption of the updated California Tropical Forest Standard (CFTS) by the California Air Resources Board at the upcoming September 19, 2019 hearing, would send a strong signal calling for enhanced climate action in tropical forests, at both the subnational and national scales. Given the urgency, as indicated in the IPCC special report on the impacts of global warming of 1.5 °C, and the important role to be played by the land use and forestry sector, as seen in the IPCC special report on Climate Change and Land, this could not be more timely.

UNDP affirmed, in its public comments supporting the 2018 version of the Standard, that the main features and characteristics of the Standard provided a solid foundation for a robust system to ensure that there are real, additional emission reductions, environmental integrity is maintained, and social and environmental safeguards are fully addressed. These overall views apply to the updated Standard as well.

UNDP now also welcomes the further enhancements made to the Standard, which build upon that strong foundation.

In particular, UNDP welcomes the additional clarity provided by the new references - throughout the Standard - to both the Social and Environmental Safeguards outlined in Chapter 10 and the Governors' Climate and Forest Task Force Guiding Principles for Collaboration and Partnership Between Subnational Governments Indigenous Peoples and Local Communities (GCF 2018).

The chosen benchmark standard provides a detailed framework for reporting on safeguards implementation, with clear indicators to measure progress related to many of the key issues that are foundational to a successful jurisdictional plan, including protection of indigenous peoples' rights, a gender-sensitive approach and equitable benefit sharing.

In other areas of the updated Standard, the clarity has been enhanced, such as the case of reference level crediting baseline, as well as buffer pool establishment. The provisions on other issues have also been strengthened, such as requirements around transparency as well as leakage.

In general, the updates that have been made strengthen provisions of the Standard and ensure responsiveness to comments made by Stakeholders during this process.

We very much appreciate the opportunity to provide these inputs on the proposed CTFS and again, commend California's leadership in this area.

A handwritten signature in black ink, appearing to read 'Tim Clairs', is centered on the page.

Tim Clairs

Principal Policy & Technical Advisor

Climate and Forests, UNDP