



Honorable Members of the California Air Resources Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

August 28, 2019

**Comments from Conservation International on the California Tropical Forest Standard: Criteria for Assessing Jurisdictional-Scale Programs that Reduce Emissions from Tropical Deforestation**

Dear Chair Nichols and Members of the Board,

Conservation International appreciates the opportunity to submit comments to the California Air Resources Board (CARB) in response to the updated California Tropical Forest Standard: Criteria for Assessing Jurisdictional-Scale Programs that Reduce Emissions from Tropical Deforestation hereinafter the "Standard"). Conservation International is convinced of the importance of nature-based solutions to climate change and urges CARB to endorse the Standard as an important step towards increasing their implementation.

Natural climate solutions are proven ways of storing and reducing carbon emissions in the world's forests, grasslands and wetlands. Better stewardship of the land also has been shown to provide many other critical environmental, social and economic benefits. These solutions are available immediately, are scalable and can transform key sectors of the global economy, such as forestry and agriculture. The Intergovernmental Panel on Climate Change (IPCC)'s [Special Report on Climate Change, Desertification, Land Degradation, Sustainable Land Management, Food Security, and Greenhouse Gas Fluxes in Terrestrial Ecosystems](#) released August 8, 2019, concludes that "reducing deforestation and forest degradation rates represents one of the most effective and robust options for climate change mitigation" with potential to reduce up to one-third of total global emissions. The report also notes that preserving and restoring forests and peatlands and other options that do not require land use change provide almost exclusively positive impacts on sustainable development, such as reducing poverty and hunger and enhancing health, clean water and sanitation.

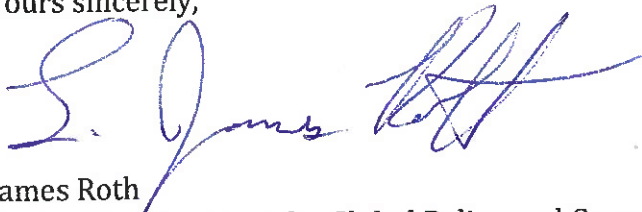
Global estimates suggest that only 2% of public climate finance supports activities reducing emissions from agriculture, forestry, and other land use. It is estimated that up to USD 33 billion in investment will be needed to make the step change towards a deforestation-free global economy by 2030; this finance will need to come from public and private sources, including from market measures, such as the California Cap-and-Trade program. All actors--both public and private--must go much further in reducing

emissions and increasing sinks from the land sector if the world is to narrow the ambition gap for tackling climate change.

We recognize that public participation and respect for the rights of forest-dependent and other local communities and other social and environmental safeguards are critical for effective and equitable design and implementation of forest sector programs. To provide assurances that these safeguards have been respected, we strongly support the requirements, clarified and strengthened in the updated version of the Standard, for partner jurisdictions to provide annual independently verified reports on safeguards using principles, criteria and indicators that conform to REDD+ SES Version 2 ([www.redd-standards.org](http://www.redd-standards.org)). These requirements demonstrate that the free, prior and informed consent of indigenous peoples has been obtained for any activities affecting them, effective participation of women and vulnerable and marginalized groups, equitable benefit sharing, and enhancing biodiversity and ecosystem service priorities. REDD+ SES was developed through an inclusive participatory process and provides a comprehensive framework covering best practices on a full range of risks and opportunities of tropical forest sector programs. Experience from use of REDD+ SES in seventeen jurisdictions including in Brazil, Indonesia, Peru, Mexico and Democratic Republic of Congo shows that it has supported transparent, participatory and comprehensive assessment of safeguards for forest sector programs.

We commend CARB for its ongoing leadership in addressing climate change and recognition of the vital role reducing deforestation must play in any climate change solution. We urge the Board to endorse this Standard and look forward to working with you in support of this effort.

Yours sincerely,



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Conservation International