

To:

- The Honourable Jerry Brown, Governor of California
- The California REDD Offset Working Group (*Via website stateredd.org*)

CC: Mary Nichols (Chair, California Air Resources Board), Ashley Conrad-Saydah (Assistant Secretary for Climate Policy, California Environmental Protection Agency), Arsenio Mataka (Assistant Secretary for Environmental Justice and Tribal Affairs, California Environmental Protection Agency), La Ronda Bowen (Ombudsman, California Air Resources Board), Jason A. Gray (Staff Counsel, California Air Resources Board)

06 May 2013

Re: Forest Offsets in California's Cap and Trade Program

Dear Governor Brown,

We write to urge you to stop the inclusion of international REDD+ offsets (Reducing Emissions from Deforestation and Forest Degradation) into California's Cap and Trade program. Emissions trading systems have failed to decrease emissions while offset projects have continually disregarded the rights of local communities and are inherently flawed. The undersigned organizations send this letter to warn against including international REDD+ credits which will inevitably worsen environmental and social conflicts.

Early attempts to include forests credits in UN-backed carbon markets led to uncertain technical debates. International REDD+ forest credits have been until now rejected in the UN climate talks and kept out of the European Union's Emissions Trading Scheme (EU ETS) for good reasons. Unresolved technical problems include additionality (proving that the forest area would not have been protected anyway), leakage (forest destroyers moving to another area), permanence (trees do not store carbon permanently), measurement (highly complex and uncertain since it relies on biological variables), and temporality (emissions and removals may still occur many years after a project happens). Besides these technical uncertainties however, the underlying causes of deforestation remain largely untouched while the responsibility to reduce emissions at source is watered down.

Due to these issues, the inclusion of international forest offsets in California's Cap and Trade program would likely *increase* rather than decrease greenhouse gas (GHG) emissions relative to AB 32's objectives as polluting industries buy rights to further emissions. This would continue to expose low-income communities that live nearby industrial installations in California to greater health and environmental problems. While many Indigenous Peoples and forest-based communities living in the South have few and insecure formal titles to their land, REDD+ will fuel property speculation, increase pressure over land rights, and dispossess local populations. These risks are exacerbated by the inclusion of monoculture plantations in the current UN standard definition of what constitutes a forest.

Biodiverse forests have unique significance to those who live in and depend on them for their livelihood and cultural survival. Serious concerns related to environmental and human rights violations with REDD+ projects have led to opposition from Indigenous Peoples and local communities in Chiapas, Mexico and Acre, Brazil (the two jurisdictions where California's polluters would buy from its initial international credits). There are many overwhelming dangers of reducing forests to carbon sinks. Land struggles intensify as rights to lands become separated from rights to access and use of other elements of nature.

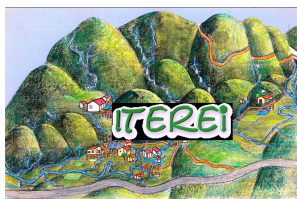
The government of Chiapas, Mexico, for example, is promoting a REDD+ pilot project in the Lacandon rainforest over seven Natural Reserves. In order to be 'Ready for REDD+' the government must prove that the areas from which carbon certificates would be generated are under environmental protection. For this purpose, the National Commission has already 're-located' several local communities using forced evictions and economic pressures in spite of strong resistance.

In addition, the expansion of monocultures for agrofuels is another of Chiapas government's rush. A state program, 'Productive Reconversion of Agriculture', provides local communities from the Lacandon jungle with payments to grow African palm and jatropha for agrofuels which are invasive, destroy local forests and create economic dependencies which crush local autonomy. Chiapas is the state in Mexico with the largest plantation area for palm trees, located at the edges of Protected Natural Areas, these monocultures use vast quantities of pesticides which pollute soils and water and seriously harm the health of local populations. Once again: Plantations are not forests!

California should enforce policies that address the root drivers of deforestation and climate change at source in order to start the transition away from fossil fuels. Policies based on social and environmental justice should guarantee that polluters will be forced to take responsibility for their GHG emissions and environmental destruction while benefiting vulnerable and low-income communities. We urge you to keep international REDD+ credits out of the California Cap and Trade program. Further, we respectfully recommend that you look carefully at how the EU ETS has failed as a foreshadowing of what will be to come in the California Cap and Trade system. Trading emissions is NOT a solution to climate change.

Sincerely,





Organizations:

- Aliança RECOs – Redes de Cooperação Comunitária Sem Fronteiras (Brazil)
- Movimento Mulheres pela P@Z! (Brazil)
- ITEREI (Refúgio particular de animais nativos - Portaria IBDF163/78 - DOU 20/04/1978, Membro oficial da sociedade planetária UNESCO PROJETO BRA022/1998)
- Friends of the Earth International
- Centro de referência do movimento da cidadania pelas águas florestas e montanhas Iguassu ITEREI
- Plataforma Interamericana de Derechos Humanos, Democracia y Desarrollo (PIDHDD)
- Terrae Organização da Sociedade Civil (Brazil)
- Carbon Trade Watch
- FERN
- Re:Common
- Attac France
- The Corner House
- Centre for Civil Society Environmental Justice Project (Durban, South Africa)
- Earth Peoples

Further Reading:

- *EU ETS Myth Busting: Why it can't be reformed and shouldn't be replicated* (<http://scrap-the-euets.makenoise.org/press-release-15apr2013/>). Co-published by over 40 organizations signatories to the “[Time to Scrap the ETS](#)” campaign.
- *Protecting Carbon to Destroy Forests: Land Enclosures and REDD+* (www.carbontradewatch.org/articles/protecting-carbon-to-destroy-forests-land-enclosures-and-redd.html). Carbon Trade Watch