



Mill Valley, CA
August 27th 2019

Dear California Air Resources Board,

As the Founder and President of Wildlife Works, a California based forest and wildlife conservation company, I would like to submit the following comments in relation to the September 19th 2019 California Air Resources Board meeting regarding the approval of the Tropical Forest Standard (TFS). We have been working with rural forest communities in Africa, Southeast Asia and Latin America for over 20 years, to bring sustainable development to them, financed through pay-for-performance REDD+. In this work, we have seen how important both financial and non-financial international support is for both forest communities and tropical country governments. Included in our work are indigenous peoples, who we know must endure many challenges to their forests and who appreciate very well the value of a well-designed and managed REDD+ project or program to provide them with the resources they require to protect their land.

1. Wildlife Works strongly supports implementation of the Tropical Forest Standard, beginning with approval by the CARB.
2. We applaud the State of California for remaining committed to its long-standing policy directives and commitments towards the eventual inclusion of jurisdictional and national REDD+ emission reductions in the California offset market. We urge the CARB and its counterpart state entities to proceed vigorously with the policy process required to adopt the TFS as a critically-important first step. This will send a significant signal to tropical forest governments that the right mix of REDD+ policy and market incentives in their own economies, supported by rigorous safeguards to ensure positive community participation, could lead to TFS accreditation for their country or jurisdiction. This would in turn provide them with significant credibility for other international programs well beyond California.
3. Wildlife Works would also like to stress the critically important co-benefits to communities and biodiversity generated by each successful tropical forest REDD+ program that qualifies under the TFS. Setting a global standard for jurisdictional and national REDD+ programs for California market consideration in the future encourages additional, positive international development benefits that will in turn foster international goodwill towards California.
4. In addition to Wildlife Works, California is home to some of the most innovative private sector companies operating in the international REDD+ sector. CARB's support for REDD+ via the TFS will create more jobs in California and further

reinforce California's leadership in this sector.

5. We do have a detailed comment about the TFS as it stands today. Chapter 7 detailing the requirements on leakage states that the "implementing jurisdiction" must detect and account for activity-shifting and market based leakage outside of their borders. If the "implementing jurisdiction" is a national government we take this to mean that leakage occurring internationally would have to be monitored, measured and accounted for. This is a major departure from the existing structure of REDD+ accounting, and raises many questions of national sovereignty and methods for emissions accounting under the UNFCCC Paris Agreement.
6. There is also one clarification we will seek under the TFS once it is approved, before wholeheartedly recommending it to the tropical forest country governments with which we work. The language in Chapter 4 and Chapter 6 which separately refers to the jurisdictional baseline (Chapter 4) and the "crediting baseline" (Chapter 6) could be interpreted to indicate that the State of California is attempting to influence tropical forest governments to produce a national (or jurisdictional) baseline for their REDD+ program under the Paris Agreement that is based on a strict 10-year average of historical emissions. This approach is only one option for reference level submissions under the UNFCCC Paris Agreement, and not the option most commonly taken by High Forest Low Deforestation (HFLD) countries. Many of these countries have seen high emissions growth in recent years, due to the end of armed conflict or increased political stability, amongst other reasons. We do believe that this is not what the State of California intends, but rather the TFS means that both the reference level from Chapter 4, and the crediting baseline - set at 10% below the reference level - from Chapter 6 would be specific to participation in the TFS. We further assume that the State of California has no intention of precluding tropical forest governments from using their existing UNFCCC Paris Agreement reference level developed using other methods allowed under the UNFCCC for other international and domestic programs, outside of TFS. If this is the case, we suggest a simpler approach would be to combine the two points and clarify the TFS' intention by requiring that the "crediting baseline" which is eligible for TFS must be set at 10% below the 10-year historical average annual emissions, while using the term "reference level" to refer to the country's submitted reference level to the UNFCCC, using any method allowed under that agreement. This would reduce confusion about whether the TFS is suggesting that its crediting baseline is the sole baseline that could be used by Paris Agreement countries, should they wish to participate in the TFS, which again we assume was not your intention.

Thank you for your consideration



Mike Korchinsky
President
Wildlife Works