From the Director of the Climate, Community & Biodiversity Alliance

To the California Air Resources Board

January 14, 2016

The CARB staff white paper on *Scoping Next Steps for Evaluating the Potential Role of Sector-based Offset Credits under the California Cap-and-Trade Program, including from Jurisdictional 'Reducing Emissions from Deforestation and Forest Degradation' (REDD) Programs*, October 19 2015, is very welcome.

I am submitting these late comments to provide information on new advances in reporting on social and environmental safeguards in jurisdictional REDD programs that I hope will be helpful to CARB in reviewing options to move forward with this important issue.

As noted in the white paper, there is great potential for REDD+ activities to deliver significant benefits to local communities, for biodiversity and to make an important contribution to support a transition to low-emissions sustainable development in developing countries. There is also legitimate concern from many groups that REDD+ initiatives could undermine the rights of indigenous peoples and reduce the livelihood security of vulnerable and marginalized groups, or cause other social and environmental harm. Strong safeguards that meet international best practice standards must be applied in the partner jurisdictions under consideration for provision of REDD offsets to the California cap-and-trade program, and California will need good information to ensure that these safeguards are being adhered to.

The REDD Offset Working (ROW) Group recommended that California should only accept REDD credits from partner jurisdictions which have demonstrated safeguards consistent with United Nations standards and other standards, such as the REDD+ Social & Environmental Standards (SES). Additionally, California should ensure the safeguards are monitored and the reporting mechanisms are transparent to all stakeholders. Partner jurisdictions should define their own performance indicators by applying the REDD+ SES. This includes robust consultation and inclusion of local communities in the design of a REDD Program before the implementation of the REDD Program. Partner jurisdictions should submit third-party verified reports about the safeguards and grievances before any credits are issued (p.28 or white paper).

The REDD+ SES Initiative provides guidance and tools to jurisdictions to enable them to meet these requirements on strong, comprehensive safeguards, implemented and monitored in a participatory and transparent manner. The Initiative was started in 2009 by the Climate, Community & Biodiversity Alliance (CCBA), a partnership of NGOs (CARE, Conservation International, Rainforest Alliance, The Nature Conservancy and Wildlife Conservation Society). The Initiative is managed by the CCBA secretariat based at Conservation International. The Initiative is overseen by an International Steering Committee of representatives from governments, multilateral organizations, Indigenous and Community organizations, social and environmental NGOs and private sector mostly from countries where REDD+ is implemented. For more information see www.redd-standards.org

Significant progress has been made in several jurisdictions on the definition and reporting of safeguards since the development of the ROW recommendations. Most notably, the State of Acre in Brazil has completed the full ten-step process defined in the REDD+ SES Guidelines and has produced a detailed monitoring report of compliance with social and environmental safeguards in the SISA and ISA Carbon

programs of the State of Acre. The REDD+ SES Initiative conducted an International Review of the process followed by Acre to develop the monitoring report. The review confirmed that the State of Acre in Brazil developed a comprehensive set of country-specific indicators and a self-assessment report of the social and environmental performance of the State System for Incentives for Environmental Services (SISA) REDD+ program through a process that had strong stakeholder participation and transparency following the ten steps of the Guidelines for the use of the REDD+ Social & Environmental Standards at Country Level (Version 2 November 2012) with some variations described in the report.

For detailed information on the progress achieved in Acre please find attached:

- REDD+ Social & Environmental Safeguards Monitoring Manual in the System of Incentives for Environmental Services (August 2013)
- Self-evaluation report of compliance with the social and environmental safeguards in the SISA and ISA Carbon Program of the State of Acre (November 4, 2014)
- REDD+ SES International Review State of Acre, Brazil (November 2015)
- REDD+ SES International Review State of Acre, Brazil – Executive Summary (November 2015)

These reports documenting the progress on safeguards in Acre provide information and assurances that will be very important for consideration of the inclusion of REDD credits in the California cap-and-trade program. The Acre case provides a first experience. The State of Mato Grosso in Brazil and the States of the Yucatan Peninsula in Mexico intend to follow a similar process. I would be pleased to receive feedback about the potential safeguards information needs for California, with a view to further development of the REDD+ SES guidance and tools for jurisdictions and of the assurance processes. Please do not hesitate to contact me with any questions or for further information.

Dr Joanna Durbin
Director, Climate, Community & Biodiversity Alliance
jdurbin@climate-standards.org