



**Amigos de  
la Tierra  
América Latina  
y el Caribe**

28 April, 2013

The Honorable Jerry Brown  
Governor of California  
c/o State Capitol, Suite 1173  
Sacramento, CA 95814  
Via fax: (916) 558-3160

Mary Nichols  
Chairman, California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814  
Via fax: (916) 327-5748

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

Dear Governor Brown and Chairman Nichols,

As an organization with wide representation in Latin America, including in Brazil and Mexico, we are writing to register our opposition to California's inclusion of international forest offsets in the state's cap and trade program, as recommended by the REDD Offsets Working Group's document "Recommendations to Conserve Tropical Rainforests, Protect Local Communities and Reduce State-Wide Greenhouse Gas Emissions."

It goes without saying that, as member groups of Friends of the Earth International, the world's largest federation of grassroots environmental rights organizations, we strongly support the need to reduce climate emissions, protect the world's forests, and forge a just transition to a low emissions development path. In this regard, we applaud California's leadership and the important contribution that your AB32 law makes in addressing these concerns. As one of the largest economies in the world, your state's efforts make a great deal of difference.

It is in that light, however, that we are compelled to register our concern that using REDD offset credits to meet California's emissions reduction targets will weaken your state's efforts to truly reduce CO2 emissions, will fail to protect tropical forests in ways that meet current best practices, and will lead to serious abuses of human rights and the rights of indigenous peoples.

Numerous experiences of existing REDD mechanisms and processes show that REDD initiatives, both project-based and national, are inefficient, ineffective, and lead to perverse outcomes. Given the volatile nature of carbon markets and the widespread potential for gaming, corruption, fraud, and perverse incentives that exist in these markets, REDD programs financed primarily or wholly through offsets, such as that proposed for California, will magnify all the problems we have already experienced with REDD.

Since the start of the Bali Action Plan, defined at UN COP 13 in December 2007, coming up with an international mechanism to deal with the Reducing Emissions from Deforestation and Degradation (REDD) program took a disproportional centralism in the UNFCCC, drawing the discussions away from the root causes of the climate crisis. At the global level, the REDD agenda is a concrete result of the illegitimate agreement at COP15 in Copenhagen, and the subsequent illegitimate agreement at COP16, Cancun..

In the view of Friends of the Earth Latin America and the Caribbean (ATALC), taking into account that deforestation represents between 12% and 20% of total emissions, using REDD programs to address industrial emissions in the global North means:

- dangerously shifting industrialized countries away from the commitment to reduce emissions generated by burning fossil fuels, thereby not dealing with the structural and historic causes of the climate crisis;
- shifting responsibility for the climate crisis to the countries of the South, which do not have historical responsibility for the crisis, and are also the most vulnerable to the impacts of global warming;
- using the deforestation problem, which, while very real, is not the primary cause of the crisis, as a distraction from the root cause of the crisis;
- denying the structural causes of deforestation – the over-consumption of resources by industrialized nations and a world trade regime that favors the North's access to natural goods;
- creating the foundations for a new cycle of market speculation based on speculative and compensatory carbon markets; these markets have a strongly negative impact on our countries and our communities by creating new privatization regimes, and increasing the access of markets to goods such as land, water and biodiversity, all of which threatens the protection and defense of our public and natural commons and the collective management of territories and resources by indigenous and traditional communities;
- increasing large-scale monoculture plantations (for cellulose, agrofuels and other energy means) under the guise of enhancing carbon stocks.

The architecture to legitimize and consolidate the REDD mechanism is already reflected in our territories, through efforts such as the Law of Ecosystem Services (SISA) in Acre, Brazil, and the early and severely problematic implementation of a quasi-REDD program in Chiapas, Mexico. Such initiatives have revealed themselves to encourage deeply troubling initiatives and dynamics, such as:

- mapping and defining the control of deeds to land and the respective carbon stocks;
- speculation of land prices that undermines the implementation of agrarian reform and food sovereignty programs;
- the siege and co-opting of communities with collective deeds to the land and the lack of respect to indigenous rights and peoples' rights in general;
- measures to "regularize land property" to transfer public lands to private hands;

- strong pressure to change environmental laws to transfer protection duties from the State to the markets under the guise of paying for environmental services, forest concessions, creation of protected areas, etc.;
- favoring and strengthening the large international conservationist NGO's and corporations as legitimate political actors and protagonists of the new environmental discourse defined by pragmatism and by the environmentalism of (business) results or of markets, which leads to the weakening of development policies to community management of forests and the biodiversity by native communities;
- transfer of land to foreigners;

Due to the aforementioned, and due to the extensively documented and criticized knowledge of the experiences of carbon markets created under the clean development mechanism (CDM), whose impact in projects such as hydroelectric dams and plantations, are being felt in the South while they compensate for the emissions *not being reduced* in countries with historic responsibility, and do not create a real change in patterns of production and consumption, **we oppose any implementation of the REDD mechanism** in our nations and territories.

We believe that California can play the most effective and productive role in the global effort to protect forests by addressing the state's own consumption patterns, investments, and trade and procurement policies as they may impact tropical deforestation. However, a step towards the inclusion of sub-national REDD offsets in its cap-and-trade system would be a step in the wrong direction for forests, climate, and people.

We appreciate California's interest in helping to protect tropical forests, but implementing a REDD program as part of AB32 is absolutely the wrong approach. We urge you, do not allow REDD credits into AB32's cap and trade program.

Thank you,

Friends of the Earth Latin America and the Caribbean