

January 31, 2008

To Whom It May Concern:

The Canadian Parks and Wilderness Society (CPAWS) is writing to provide response to the Western Climate Initiative on the papers presented by the Scope and Offsets subcommittees.

CPAWS is Canada's pre-eminent, community-based voice for public wilderness protection. We have played a lead role in establishing over two-thirds of Canada's protected areas since 1963. CPAWS has expertise and interest in the design of international, regional and domestic climate change frameworks that have environmental integrity and benefits to the atmosphere and biodiversity.

WCI Scope Subcommittee Paper

The Canadian Parks and Wilderness Society supports the view of WeCAN that the cap should cover all sectors that the Scope Sub-committee has identified as feasible to cover in the near-term.

We would additionally like to point out that the subcommittee observes on page 40 of the options paper that a less than fully comprehensive approach to covering forestry and land-use change within a cap-and-trade program could be possible.... "For example, the cap-and-trade program could focus solely on land conversion, from forest cover to other uses, and from other uses to forest cover." A cap-and-trade program that included all sectors identified as feasible in the near-term by the sub-committee would include land-use change, whether or not the inclusion of forestry is deemed feasible.

There is precedence for treating forestry and land-use change differently: under the current rules for Land Use, Land Use Change, and Forestry under the Kyoto Protocol, it is mandatory to account for carbon emissions and removals from land use change (afforestation, reforestation and deforestation), but optional to account for carbon emissions and removals resulting from forest management.

Recommendation 1: Include land-use change within the cap-and-trade program in the near-term, whether or not forestry can be feasibly included at the same time.

CPAWS also joins WeCAN in urging WCI to explore measurement, reporting and cap design elements so that the forest sector can be included within the cap-and-trade program as soon as possible. Further, we believe that inclusion may be possible in the near-term. Including the forestry sector within the cap-and-trade program is important because emissions from forest carbon-stock depletion are significant and there is a need to address the forest carbon debits as well as credits that might result through forest offsets.

Recommendation 2: Explore the possibility of including aspects of forestry under the cap in the near-term. The inclusion of forest carbon stock changes would be a priority for inclusion.

Finally, we urge WCI to consider whether biological carbon credits should be fungible with fossil carbon credits, recognizing a possible difference in permanence between the two credits types.

WCI Offsets Subcommittee Paper

CPAWS supports the submission on offsets made by WeCAN. Additionally, CPAWS urges WCI to embrace positive co-benefits to biodiversity as a required filter for determining the eligibility of project types if forest offsets are included within system.

Finally, we also recommend that WCI consider the issuing of temporary offsets as an alternative or complementary tool to discounting where appropriate.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Henschel", is placed over a light pink rectangular background.

Chris Henschel
National Manager, Domestic and International Policy
Conservation and Climate Change