

March 20, 2024

The Honorable John Podesta
Senior Advisor to the President for International Climate Policy
White House
1600 Pennsylvania Ave
Washington, D.C.

Re: Alliance Against Carbon Offsets Pursuant to Article 6 of the Paris Agreement
and in Support of Effective Alternatives for U.S. Climate Legislation & Treaties

Dear Mr. Podesta,

We urge you, as the Senior Advisor to the President on International Climate Policy, to oppose the development of a global carbon market pursuant to Article 6 of the Paris Agreement, for the reasons listed below, and to call for policies that will effectively address the climate crisis. We now have several decades of experience that demonstrate how **carbon market schemes do not reduce fossil fuel extraction and combustion or deforestation**. Rather, carbon markets [and offsets](#) allow polluting industries to [increase greenhouse gas](#) emissions, while falsely claiming they have reduced emissions, as well as embrace technologies [and practices](#) that can also increase greenhouse emissions.

We urge you to oppose carbon markets and carbon offsets because they are inherently flawed:

- **Lack of additionality:** Carbon offsets are rarely additional, meaning they often are based on emissions reductions that would have happened in the absence of the carbon offset schemes. This diverts resources to activities that would have happened in the absence of carbon offset schemes and allows for double counting of any potential benefits.
- **Dangerous for Indigenous Peoples:** Carbon offset projects have divided Indigenous communities and threaten their rights and sovereignty.
- **Harm Frontline and Environmental Justice Communities:** Carbon offsets erroneously justify continuing greenhouse gas emissions, which in turn can increase harmful air pollution that disproportionately impacts disadvantaged communities.
- **Impermanent:** Carbon offset schemes incentivize practices that have the potential to temporarily reduce greenhouse emissions, while justifying practices that will permanently release emissions into the atmosphere and result in net increase in greenhouse gas emissions.
- **Unverifiable:** Carbon offsets rely on third party verifiers who have financial incentives to game the system by verifying offsets that are also impermanent.
- **Undermine Global Climate Goals:** Carbon offsets will create a strong perverse incentive, allowing parties to the Paris Agreement to avoid real and meaningful reductions in greenhouse gasses by opting into ineffective international carbon offset schemes.

Time is running out. The International Institute for Sustainable Development and the International Energy Agency [agree](#) that new oil and gas developments are “incompatible” with the [1.5 C target](#) called for in the Paris Agreement. Allowing specious offsets to justify continuing emissions would be a grave mistake for our planet. We are already seeing the impacts of climate change with ever increasing extreme weather events resulting in flooding, droughts, wildfires and extreme temperatures, which are impacting food production, access to drinking water and leading to unprecedented death and destruction. With [U.S. oil and gas production](#) and [atmospheric CO₂](#) at their highest levels ever, we cannot afford national and international climate policy based on a known climate scam to further delay the need to rapidly phase out fossil fuels.

As negotiations on Article 6 of the Paris Agreement continue and loopholes for so-called abated fossil fuels are enshrined, it is critical that you highlight the serious consequences of continuing down the path of implementing global carbon markets, and resist efforts to move them forward. Banking on greenhouse gas offsets to save our planet is neither sensible nor possible. Since the Paris Agreement was adopted in 2015, the parties have spent nine years debating how to structure Article 6 in order to facilitate a UN sponsored global carbon offset market. Despite the extensive evidence of offsets flaws and failures, parties are currently working on methodologies to quantify and verify flawed carbon dioxide removal (CDR) projects as tradeable carbon offsets.

Biological CDR in a carbon market such as carbon sequestration through trees, coral, and biomass, have not functioned as a solution to climate change and cannot be guaranteed in perpetuity. [Studies](#) continue to [demonstrate](#) that [biological carbon offset](#) projects lack [scientific justification](#), are difficult or impossible to [verify](#), and [increase serious conflicts](#) which threaten the rights and sovereignty of [Indigenous Peoples](#). Likewise, despite decades in development, CDR technologies such as carbon capture and storage, remain costly, energy intensive, and impermanent ‘solutions’ to a planet in crisis. In most cases, they are primarily used to prolong fossil fuels production. What is worse, these [illusory carbon trading schemes](#) create additional risks to communities and our climate. Storing carbon underground [can cause earthquakes](#), contaminate drinking water, increase air pollution, and [leak greenhouse gasses through pipelines and storage infrastructure](#).

Further, carbon markets also impact food and agriculture. Carbon credit schemes on farmland have been associated [with land grabs](#), often benefiting polluters more than farmers, and are easily reversible. Providing carbon credits for methane digesters incentivizes an increase in herd size resulting in more manure, thereby creating additional emissions along with water and air pollution. Digesters are expensive and mostly used on large-scale factory farms, where [digesters are already receiving various state and federal subsidies](#), and therefore not “additional” to what otherwise would occur. Digesters also further [entrench the natural gas industry](#), using fossil fuel infrastructure and energy systems that are dangerous for the planet. It is time to change course.

We know how to curtail greenhouse gas emissions – a rapid, strategic phaseout of fossil fuels including regulation, public investment and international treaties. Carbon offsets and associated markets are the opposite of an effective tool for this rapid, strategic phaseout. They obscure transparent accounting of our progress toward meeting the targets necessary to stabilize our climate. As the new climate envoy for the United States, we call on you to lead us on a path that will oppose the use of climate scams inherent in carbon trading schemes so that we can phase out fossil fuels at the source and build healthy communities.

Original Signatories

Indigenous Environmental Network
Food & Water Watch

Institute for Agriculture and Trade Policy
National Family Farm Coalition

Additional Signatories

ADOS Mississippi/ADOS Empowerment
Project

Alaska Community Action on Toxics

Animals Are Sentient Beings, Inc.

Better Path Coalition

Between the Waters

Beyond Extreme Energy

Biofuelwatch

Boone County Farmers & Neighbors

Bucks Environmental Action

CASE Citizens Alliance for a

Sustainable Englewood

Catskill Mountainkeeper

Center for Biological Diversity

Center for Common Ground

Citizens Caring for the Future

Clean Energy Action

Climate Communications Coalition

Climate Communications Coalition

Climate Reality San Diego

Colectivo Voces Ecológicas COVEC

Collective Abundance

COMMUNITY ACTION FOR HEALTH &
DEVELOPMENT (CAHED)-Director

Cooperation Jackson

Corporate Accountability

DivestNJ

Don't Gas the Meadowlands Coalition

Earth Action, Inc.

Edmund Rice International

Elders Climate Action

Environmental Communion NJ

Association UCC

Ephram Mwangi Foundation

Extinction Rebellion Seattle

Extinction Rebellion Western Mass

Family Farm Defenders

Farm Forward

Fat Cat Farm

Fellowship of Scientists and Engineers

Fox Valley Citizens for Peace & Justice

For Love of Water (FLOW)

Fossil Free Tompkins

Fresh Approach

Friends of the Earth, International

Friends Of the Forestville Dam, Inc.

Grassroots Environmental Education

Grassroots Global Justice Alliance
Great Plains Action Society
Greater New Orleans Growers Alliance
Green Finance Observatory
Green Foster Action Uganda
GreenLatinos
HobokenRESIST
IBON Africa
Institute for Policy Studies Climate
Policy Program
Intheshadowofthewolf
Iowa Citizens for Community
Improvement
Just Transition Alliance
Kapchanga
Kewaunee CARES
Lombard Art allery
Long Island Progressive Coalition
MARBE S.A., Costa Rica
McDonough NY Concerned Citizens
Methane Action
Milwaukee Riverkeeper
Movement Rights
Network for Ecofarming in Africa
New Mexico Climate Justice
North American Climate, Conservation
and Environment(NACCE)
Northeast Organic Farming Association
of New York (NOFA-NY)
NYCLASS (New Yorkers for Clean,
Livable, and Safe Streets
Peace Action WI
Physicians for Social Responsibility
Physicians for Social Responsibility
Pennsylvania
Plant Based Treaty
Public Employees for Environmental
Responsibility
Public Goods Institute
Pueblo Action Alliance

RerootD Futures Initiative
Rise Up WV
River Queen Greens
Rural Vermont
Rural-VT
SPROUT
Sprout NOLA
St. Croix County Defending Our Water
Stop the Algonquin Pipeline Expansion
The Enviro Show
The Oakland Institute
The Phoenix Group
Too Tall Farm & Nursery
Unitarian Universalists for a Just
Economic Community
United Native Americans
Vibrant Littleton
Waterspirit