



CAN briefing for the LULUCF negotiations, Cancún 2010

Summary

It is essential that emissions from land use, land-use change and forestry are accounted for in a way that reflects what the atmosphere sees. CAN remains extremely concerned that parties are determining LULUCF rules in a way that encourages hiding emissions rather than taking responsibility for emissions in this sector. Mitigation efforts undertaken in the LULUCF sector must be additional to the significant reductions in fossil fuel emissions required from other sectors. Parties are also responsible for ensuring that land use, land-use change and forestry contribute to the attainment of their commitments under the Kyoto Protocol.

Core LULUCF issues to ensure genuine environmental integrity

This briefing is arranged to correspond with the order in the latest Chair's LULUCF text:
<http://unfccc.int/resource/docs/2010/awg14/eng/crp03.pdf> (LULUCF rules start on p21)

DEFINITIONS

The current definition of 'forest' sets the bar for forest area, canopy closure and tree height so low that existing forests can be severely degraded, nearly deforested and even converted to plantations while still being deemed forests. This means that any emissions from such activities are not captured by the accounting requirement to include emissions from deforestation. Therefore this definition combined with the current rules that allow countries to select whether or not to include emissions from "forest management" – which would capture the emissions from these activities – means that significant carbon stock changes from land use are not being captured.

The problems associated with this definition could be overcome by using a narrower definition of forests such as those suggested by the FAO, requiring that countries account for conversion between categories, or through mandatory accounting of forest management → **support 6. bis. with removal of brackets from forest management**

A definition of wetland management is necessary to facilitate the addition of this new activity (see below) → **support 1.(i)**

The proposed planted production forest and equivalent forest definitions could be used to promote the conversion of natural forest to plantations without incurring any penalty → **oppose 1. (j) and 1. (k)**

ARTICLE 3.3

Allowing deforestation of production forest to be accounted as harvesting under Article 3.4 instead of 3.3 will allow emissions from harvesting to be ignored where Parties select a projected reference level that hides their proposed emissions from harvesting → **delete 3. bis**

ARTICLE 3.4

Inclusion of voluntary activities

A new activity of "wetland management" should be added and all existing 3.4 activities should be made mandatory as soon as data quality issues can be resolved. A "hotspot approach" should be used to address progressive resolution of data quality issues. → **Support a revision of the proposed SBSTA work programme to support and facilitate all countries in expanding their reporting requirements and estimating their emissions from land uses activities under Article 3.4 in the most accurate and practicable way given the available resources.** → **Delete 6. support bracketed text in 6. bis; delete 7**

Accounting for forest management - 11

CAN believes that all Parties should adopt an approach that accounts for changes in emissions that the atmosphere sees. To avoid the perversities of measuring against a single base year, a historical base period should be used based on data from 1990-2008. This represents the position with the greatest environmental integrity: a reference level based on a historical average best accounts for changes in net emissions experienced by the atmosphere in the commitment period. None of the options in the current text conform with this proposal. → **Introduce new text requiring Annex I Parties to account for changes in emissions and removals relative to the average emissions/removals in the period from 1990-2008.**

Option 1 falls short of our proposed approach because it is based on emissions/removals in the commitment period only, and not a comparison to historical levels. It also fails to adequately capture the impacts of anthropogenic activity in the LULUCF sector.

Option 2 falls short of our proposed approach because it allows Parties to propose their own reference levels based on a flexible menu of criteria contained in footnote 10. On aggregate, the reference levels proposed by developed country Parties under this option allow a significant increase in net emissions from forest management relative to the 1990-2008 average without accounting for them, thereby undermining national pledges by around 450 Mt CO₂ per year.

Option 3 falls short of our proposed approach because the baseline would change over time by incorporating emissions and removals from future commitment periods. This would mean the effects of mitigation activities become incorporated in the baseline over time thereby penalizing early actors and rewarding late movers.

ARTICLE 12

CAN does not support any expansion of the list of LULUCF activities eligible under the CDM. → **Support 12 (delete second sentence); support 13 & 14.**

GENERAL

Account for emissions from bioenergy

Emissions from burning biomass for energy is not accounted for under the energy sector because it is assumed that this accounting takes place in the LULUCF sector. This creates a troubling accounting gap if bioenergy emissions are not adequately captured by LULUCF accounting rules.

→ **Support new text (suggested para 20): If a Party has not elected to account for forest management or if the area of forest management is smaller than the area of forest land, the Party shall account for displaced emissions. Displaced emissions are the anthropogenic greenhouse gas emissions by sources that occur on forest land as a consequence of a reduction in emissions reported under an accounted category, as in the case of biomass fuel combustion in the energy sector**

Force majeure

In principle, CAN accepts that parties should only account for emissions over which they have current and/or historical control. However, factoring out natural disturbance is open to abuse unless reporting and accounting issues are resolved. Only compliance risks from extraordinary natural disturbances should be factored out – extraordinary being defined as statistically rare. In addition, high quality spatially explicit data is essential i.e. Tier 3, Approach 3 → **Supporting monitoring of greenhouse gas emissions needs to be carried out in accordance with methodological guidance developed by the SBSTA including the use of the 2006 IPCC guidelines, or any subsequently revised IPCC Guidelines once approved by the IPCC.**

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Key safeguards in the draft text must be included/preserved:

- There should be consistency with reference levels – natural disturbance must be included in reference levels agreed in Cancun → **support 19 quinquies (a) and remove brackets;**
- Emissions from land use change must not be excluded → **support 19 quinquies (c)**
- Emissions from salvage logging, future harvesting and future harvesting must not be excluded → **support 19 ter and 19 quinquies (h)**
- Parties should be demonstrating efforts to control and rehabilitate affected areas → **support 19 quinquies (e)**

Harvested wood products

If the forest management accounting framework adopted has low accounting integrity (e.g., specifically in regards to the selection of the reference level), it is important to assume that emissions from harvested wood products (HWPs) go straight into the atmosphere (allowing no credit for carbon storage). This means that the default of instantaneous oxidation should be supported → **support 21 bis Option 1**

In addition it is essential that Parties account for emissions, not just from harvested wood product pools that are sources but also from those that are declining sinks. At the end of the last sentence of paragraph 21. → **delete “not a source” and replace with “neither a source nor a declining sink”**

In the context of Parties adopting an accounting system with integrity, accounting for emissions from HWPs can be supported providing safeguards in the draft text are preserved:

- It is essential that consistency with reference levels is maintained and that HWPs are included in reference levels agreed in Cancun. → **Support 21. sexies**
- Account HWPs as instant emissions in solid waste disposal sites → **support 21 quater**
- There must be transparent, verifiable data for all product categories and countries of export → **support 21 ter footnotes 15 and 16; these footnotes should be incorporated into 21 ter.**
- Emissions from the existing product pool must be included. (**support 1st two sentences 21. quinquies.** The third sentence in this paragraph allows Parties who select projected reference levels to ignore this pool which negates the incentive to reduce emissions from this pool, **Delete 21 quinquies third sentence**)

A new requirement to demonstrate the protection of carbon reservoirs

There should be a requirement for Parties to demonstrate that their proposed management is consistent with the previous commitments in the Convention and the Kyoto Protocol for the protection and enhancement of sinks and reservoirs → **insert under Section E. General as a new paragraph: “Parties included in Annex 1 will report on goals and verifiable measures to protect reservoirs of greenhouse gases in natural forests, wetlands and grasslands, for example through the creation of protected areas, as provided for in paragraph 3.4 of the Kyoto Protocol to estimate changes in carbon stocks comparative to levels of carbon stocks in 1990.”**
