



**Commission proposal for
a decision on LULUCF:
a CAN Europe response**

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Overview

- The environmental groups did not like the Durban decision on LULUCF.
- It has some good bits but they are few and far between.
- Overall, we think that the Commission's proposal improves on the Durban decision but it could go further.
- First, I shall outline a little of what we dislike about the Durban decision. (I only have 10 minutes)
- I shall then go on to discuss the Commission's proposal, and how to improve it



Pick and choose

- The original Kyoto rules for LULUCF allow governments to choose whether they account for particular activities or not.
- This is just plain wrong and would be considered completely unacceptable in any other emission sector, such as transport or electricity generation.
- Whilst it is sometimes difficult to estimate LULUCF emissions, countries will never do so if they do not try. It was hard to estimate emissions in some other sectors too.
- In Durban it was agreed that accounting for forest management should be mandatory but not for all other (3.4) activities.



Forest management

- Whilst countries now have to account for forest management, they can do so however they like – pick and choose again.
- EU countries have chosen to use ‘reference levels’.
- This sounds good but, in fact, reference levels are generally business-as-usual projections that allow emissions to be hidden beneath them.
- All other emission sectors have to account for emissions from a historical base year, usually 1990 (net-net).
- Forest management does not, and neither do afforestation, reforestation and deforestation.
- This is wrong. I could go on ...



Some good things about the Commission proposal

- Member states will be required to draw up national action plans for LULUCF showing how they will increase removals and decrease emissions.
- This good, LULUCF should be part of the solution to climate change rather than a problem for it.
- Accounting for all activities will be mandatory, except for the new activity of 'wetland drainage and rewetting'.
- This also good. Drainage and rewetting should be added.
- Cropland and grazing land management are accounted for properly (net-net). Everything else should be too, but against the Durban decision.
- All gases to be accounted for, good.



Some less good things

- The Commission was obviously constrained in that it could not contradict the Durban decision.
- We are thus baffled that it seems to have changed some of the definitions agreed in Durban and before. Whilst this may be a good idea in some cases, MS will be unnecessarily upset.
- The Commission has tried to address the many concerns around accounting for emissions from burning biomass and biofuels.
- We do not think that these have all been addressed, for example, regarding imports.



Conclusion

- **The Commission proposal improves upon the Durban LULUCF decision in a number of significant ways.**
- **It could, however, be further improved.**

