



Response to Commission Consultation on the 2015 International Climate Change Agreement: Shaping international climate policy beyond 2020

Respondent

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1. How can the 2015 Agreement be designed to ensure that countries can pursue sustainable economic development while encouraging them to do their equitable and fair share in reducing global GHG emissions so that global emissions are put on a pathway that allows us to meet the below 2°C objective? How can we avoid a repeat of the current situation where there is a gap between voluntary pledges and the reductions that are required to keep global temperature increase below 2° C?

The agreement has to be extensive and cover the vast majority of global emissions and all major emitters. All parties have to contribute to reduction target in a fair and accountable manner. At the same time the agreement has to be flexible with regard to various tools to achieve the main target i.e. emission reduction. This means that the varying national circumstances - like weather and soil conditions and production sectors including different agricultural crops and forest types - are taken into account and respected thus enabling countries to define the most suitable mitigation and adaptation tools at national level.

2. How can the 2015 Agreement best ensure the contribution of all major economies and sectors and minimise the potential risk of carbon leakage between highly competitive economies?

Please see the answer to Q1. The agreement has to be extensive and equitable in order to build trust among parties and avoid free riders. In addition to being equitable for countries it also has to be equitable for all sectors. For example, the net sinks of forest and agricultural sectors should not be used as a tool to lower the emission reductions within emitting sectors. The main purpose of global agreement has to be the reduction of emissions.

Implementation should ensure a mix between reduction targets and support to individual sectors. Additional science and knowledge is needed before targets are set for the agriculture sector.

In the EU -where both the forest area and the carbon stocks in the forest increases - forest growth can be increased by applying active sustainable forest management. Due to extensive forest resources and low harvesting rates - only two thirds of annual growth is harvested - this can be done without risking environmental values. Therefore strategies including carbon sequestration by forests, storage in wood products, and substitution of fossil fuels and energy-intensive materials should be further developed and

combined, bearing in mind that unattended forest will reach a balance where the volume of carbon released from the ecosystem is equal or larger than the volume taken from the atmosphere.

3. How can the 2015 Agreement most effectively encourage the mainstreaming of climate change in all relevant policy areas? How can it encourage complementary processes and initiatives, including those carried out by non-state actors?

By creating tools/methods which incentivize the inclusion of climate aspects in all relevant policies, for example by having the climate aspects included in the development policy as a prerequisite for project support and incentives.

Mainstreaming should not include one size fits all -solutions meaning that the characteristics of different sectors have to be respected. Mainstreaming should thus not mean universal requirements, rules and implementation in all sectors but rather the allocation of different measures in those sectors where they can be implemented in most reasonable and cost-effective way.

Including relevant stakeholders from all sectors in the negotiation and implementation of global agreement is another key factor for successful mainstreaming.

4. What criteria and principles should guide the determination of an equitable distribution of mitigation commitments of Parties to the 2015 Agreement along a spectrum of commitments that reflect national circumstances, are widely perceived as equitable and fair and that are collectively sufficient avoiding any shortfall in ambition? How can the 2015 Agreement capture particular opportunities with respect to specific sectors?

The commitments have to be extensive (no free riders making rules for others), fair and flexible in order to secure national implementation. The achievement of commitments should be enhanced by various incentives which make their achievement tempting and rewarding. For example the calculation methods for LULUCF sector sinks should be revised in order to make it possible to take into account the circumstances and characteristics of forested countries. The calculation methods should be based on biological realism and it should not be possible to turn a biological sink into theoretical emission as is now the case in some forested countries. The sinks should have a limited role in the new agreement but the calculation methods should encourage to the increase of sinks for example by allowing the use of a certain share of the total sink in country's carbon balance. This share should be proportionate to the total sink and not to historical industrial emissions as is now the case in Kyoto 2.

These principles should also apply to agricultural sector in case the sector will be covered by the new agreement. In that case the agreement should recognize the principles of climate intelligent agriculture where secure food production and climate change mitigation go hand in hand. Additionally, the crucial role of soil characters should be taken into account and base emission figures on non-natural data, like used tons of nitrogen fertilizations.

5. What should be the role of the 2015 Agreement in addressing the adaptation challenge and how should this build on ongoing work under the Convention? How can the 2015 Agreement further incentivise the mainstreaming of adaptation into all relevant policy areas?

No comments.

6. What should be the future role of the Convention and specifically the 2015 Agreement in the decade up to 2030 with respect to finance, market-based mechanisms and technology? How can existing experience be built upon and frameworks further improved?

Market-based mechanisms - such as carbon trade and other offsetting schemes - should be further developed and broadened both internationally and nationally in order to enable most reasonable and cost-efficient mitigation measures and their allocation among sectors and countries. Climate change cannot be solved by EU itself and therefore EU's priority should be the broadening of emission trading scheme to a truly global system.

7. How could the 2015 Agreement further improve transparency and accountability of countries internationally? To what extent will an accounting system have to be standardised globally? How should countries be held accountable when they fail to meet their commitments?

Equitable and accountable contribution of countries is a prerequisite for global agreement. Regardless of varying account capacities of countries adequately extensive and harmonized accounting systems are needed to secure parties' trust and willingness to strive towards national commitments. A priority should be given to the rapid development of accounting systems especially in the developing countries.

8. How could the UN climate negotiating process be improved to better support reaching an inclusive, ambitious, effective and fair 2015 Agreement and ensuring its implementation?

No comment.

9. How can the EU best invest in and support processes and initiatives outside the Convention to pave the way for an ambitious and effective 2015 agreement?

No comment.